



September 13, 2022

Delivered via email

To: Mayor and City Council

Re: Support for the South Carlsbad Coastline Project and the South Carlsbad Boulevard Climate Adaptation Project

Honorable Mayor and City Council,

Surfrider Foundation's San Diego County Chapter (Surfrider) appreciates the opportunity to provide comments on *Item #12 - Updates on the South Carlsbad Coastline Project and the South Carlsbad Boulevard Climate Adaptation Project*. We also appreciate City Staff for including our chapter as a stakeholder in the initial stages of this important climate adaptation project.

Surfrider Foundation is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect our world's ocean, waves, and beaches. Surfrider San Diego represents thousands of ocean recreation users — from dedicated surfers to occasional beachgoers — as well as the coastal communities and economies that rely on them throughout the region.

Surfrider San Diego supports both the *South Carlsbad Coastline Project* and the *South Carlsbad Boulevard Climate Adaptation Project*.

We are especially enthusiastic about the latter, which involves finalizing a 30% preferred project plan for realigning an extremely threatened one-mile stretch of South Carlsbad Blvd. away from the coast. As the Staff Report points out, this stretch of South Carlsbad Blvd. is *already* subject to coastal flooding from storm surge and large swell events. Damage has occurred on numerous occasions, requiring partial road closures and emergency repair work. Worst of all, large riprap barricades have been placed along the beach to protect the road, stealing valuable beach space from the public along a narrow - and continually *narrowing* - stretch of beach.



The present threat to South Carlsbad Blvd between Island Way and Manzano Drive will only worsen in the years to come. Employing the latest science in their 2022 Sea Level Rise Technical Report¹, NOAA projects an average of 10-12 inches of sea level rise (SLR) for the U.S. coastline in the next 30 years. Two feet or more of SLR is projected by 2100. Among the key near-term takeaways from this report:

- By 2050, ‘moderate’ (typically damaging) flooding is expected to occur, on average, more than 10 times as often as it does today, and can be intensified by local factors.
- “Major” (often destructive) flooding is expected to occur five times as often in 2050 (0.2 events/year) as it does today (0.04 events/year).

Clearly, the time to act is now. Doing nothing will inevitably result in a *lose-lose scenario*; the beach will be lost, and so will the road. Moving a one-mile stretch of road is no small task, and we understand that this project is still in its early planning stages. That said, once the plans are finalized and funding is identified, Surfrider views this realignment as a relatively straightforward beach preservation project because the project area is unencumbered by private property.

Surfrider’s top priority at this time is to ensure both the City Council and the greater Carlsbad community understands the necessity of realignment in order to save the beach.

Sea level rise poses an existential threat to many of North County’s most beloved beaches and surf spots. Therefore, it’s in everybody’s best interest to work together to *save as many beaches as we can, for as long as we can*. While the preservation of beaches for all puts a substantial burden on coastal communities like the City of Carlsbad, the actions we take today will be the deciding factor as to whether our children and grandchildren can enjoy the same coastal amenities that we enjoy today. They need us to act.

¹ <https://oceanservice.noaa.gov/hazards/sealevelrise/sealevelrise-tech-report.html>



We do have some concerns regarding future land uses within the project area, mainly that potential new development would interfere with existing public uses that are dependent on coastal resources.

Generally speaking, Surfrider supports the guiding principles laid out in Section 2-P.53 of Carlsbad's General Plan for any development of South Carlsbad Boulevard. We also generally support the additional design elements that apply to "coastal streets" in the General Plan's Mobility Element. These principles are summarized in the Staff Report for this Item under the subheading *Decisions Already Made*.²

The Carlsbad General Plan provides a clear vision of Carlsbad Blvd as a corridor that emphasizes both the preservation of the area's coastal resources (beaches, lagoons, views, etc.) and the public's access to them - this includes "traffic-calming" multimodal transport, as well as parking intended to facilitate coastal access. Lastly, the General Plan envisions "economic vitality through a combination of visitor and local-serving commercial, civic, and recreational uses and services."

All in all, the General Plan's vision for Carlsbad Blvd aligns well with an important stated goal in Chapter One of the California Coastal Act, to "*maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners*".³

However, Surfrider would like to remind the City Council that any development in the newly created beach/park space would be subject to the same SLR hazards that necessitate road realignment in the first place. **While Surfrider is not against public-serving amenities along the coast, our position is that these public amenities - regardless of what they are - are secondary in importance to the preservation of the beach, the public's access to the beach, and the existing public recreation uses that the beach currently provides.** Our position on this matter is supported by the Coastal Act, which states that when conflicts arise between its own

² [City Council Agenda Packet for 9.13.22](#), Item #12 pages 3-5

³ California Coastal Act of 1976, Chapter 1, Section 30001.5 "Legislative findings and declarations; goals"



various goals and policies, that *“such conflicts be resolved in a manner which on balance is the most protective of significant coastal resources⁴.”*

To spell it out clearly, Surfrider and the beachgoing public we represent would oppose any development considered in the newly created beach/park space that would ultimately rely upon shoreline protective devices - i.e. riprap revetment, seawalls, etc. - for its protection at the expense of public beach space. This is true not just of commercial development, but also of public amenities like parking lots and/or the bike lanes currently slated to replace South Carlsbad Blvd’s existing location once the road realignment project is complete. Any such proposal would be counterproductive to the entire spirit of this important climate adaptation project and appealable to the Coastal Commission.

Surfrider fully understands that at this time, the project team is focused solely on the changes to the roadway and not how the newly acquired coastal land would be used. However, as the Staff Report claims the aforementioned General Plan summary as “decisions already made,” we believe these final comments are justified.

In conclusion, Surfrider is extremely supportive of the general aspects laid out thus far for the *South Carlsbad Coastline Project* and the *South Carlsbad Boulevard Climate Adaptation Project*. We applaud City Staff for acknowledging the necessity of moving critical infrastructure away from the coast as sea levels rise, and for identifying the opportunity to begin with this low-lying stretch of South Carlsbad Blvd. that is already threatened at current sea levels. We humbly ask for the City Council’s continued support of this important climate adaptation project as it will save critical infrastructure and save a popular stretch of beach. Thank you for the opportunity to provide public comment on this matter.

⁴ California Coastal Act of 1976, Chapter 1, Section 30007.5 “Legislative findings and declarations; resolution of policy conflicts”



Sincerely,

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