CALIFORNIA COASTAL COMMISSION
SAN DIEGO AREA
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Th17b

Addendum

January 12, 2016

To: Commissioners and Interested Persons

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item Th17b**, Coastal Commission Permit Application **#6-15-0986 (Oceanside OBFP)**, for the Commission Meeting of January 14, 2016

Staff recommends the following changes be made to the above-referenced staff report. The recommended changes are generally proposed for clarification and to correct minor factual errors and to address concerns raised in a letter received from the Surfrider Foundation. Additions are shown in underline text and deletions are shown in ~~strike-out~~.

The comment letter from the Surfrider Foundation is included in this addendum as exhibit #7. Surfrider has requested that that language in the staff report related to post nourishment surfing at Fletcher Cove in Solana Beach and language in the staff report related to expected impacts to surfing conditions at the subject site be modified to further acknowledge the uncertainty of beach replenishment projects impact to surfing at the subject site. The City is in agreement with these two concerns and the concerns have been included in the addendum as numbers 8 and 9. Surfrider has also requested that the on-site project notification sign be a minimum of 4 ft. by 4 ft. The City has proposed to require a minimum sign size of 2 ft. by 3 ft. to match their existing notice sign requirements, which is incorporated as addendum item numbers 7 and 11. Lastly, Surfrider has requested that surf monitoring be required for a minimum time period of two months prior to construction and two months post construction. The City has agreed to extend the pre and post construction surf monitoring time periods and the modifications are incorporated in addendum numbers 10 and 12.

1. On Page 2 of the staff report, the third complete paragraph shall be revised as follows:

   First, the City proposes to reduce the length of the previous receiver site (southern receiver site) and to add a second receiver site (northern receiver site). The new proposed northern receiver site is located between Seagaze Drive and Pine Street and is approximately 1,500 ft. long. The new receiver northern receiver site has not

been previously used for beach replenishment, although it has been used as a replacement site in the past for the USACE Harbor Dredging Project…

2. On Page 5 of the staff report, the following shall be added to the list of exhibits:

   Exhibit 7 – Public Comment Letter

3. On Page 10 of the staff report, the third complete paragraph shall be revised as follows:

   Beach sand is proposed to be placed in three ways: 1) as a beach berm; or 2) directly into the intertidal area; or 3) piped onto the beach from a dredge. Exhibit 4 illustrates the beach berm and intertidal placement options for the receiver sites. The intertidal zone is approximately the area between -2 ft. Mean Lower Low Water (MLLW) to 7 ft. MLLW. As shown in the site plans for the southern and northern receiver sites (Exhibits 2-3), intertidal placement would occur between approximately ~~-1~~ 0 ft. MLLW and ~~6~~ +5 ft. MLLW at the northern site, and between approximately ~~2~~ 0 ft. MLLW and +5 ft. MLLW at the southern site…

4. On Page 11 of the staff report, the third complete paragraph shall be revised as follows:

   At the northern receiver site, the intertidal method would include mounds of sand that would be placed ~~at~~ approximately 0 ft. MLLW to +5 ft. MLLW ~~approximately the 0 ft. MLLW contour~~ depending on the site conditions at the time. These mounds of sand ~~would~~ could extend along the length of the project site or be focused to a smaller area within the placement site…

5. On Page 11 of the staff report, the last incomplete paragraph shall be revised as follows:

   At southern receiver site, the intertidal method would also include mounds of sand that would be placed ~~at~~ approximately 0 ft. MLLW to +5 ft. MLLW ~~approximately +5 to +10 MLLW~~ and could extend along the length of the project site or be focused to a smaller area within the placement site…

6. On Page 14 of the staff report, the fourth complete paragraph shall be revised as follows:

   A sand source must first meet the criteria required by the Project Notification Report, as identified in the preceding paragraphs. Then, more stringent testing would be conducted through development of a Sampling & Analysis Plan (SAP) prepared for and approved by the USACE. Sand must be free of contaminants and chemical hazards based on ~~Tier I~~ testing protocol as specified by the USACE and EPA…

7. On Page 15 of the staff report, the second complete paragraph shall be revised as follows:

   …In addition, the City will place a large sign or signs (minimum size 2 ft. by 3ft.) on the beach at the receiver site beginning two weeks prior to start of a replenishment project with a description of the project and contact information for any questions or comments. The sign(s) will be maintained in place during all placement activities.

8. On Page 19, the of the staff report, the third complete paragraph shall be revised as follows:

   …However, due to the relatively small amount of sand material expected to be associated with individual projects, coupled with the restrictions established to ensure that the grain size from any replenishment project is similar to existing beach sand profiles, it is ~~unlikely that long term impacts would occur or that the slope of the receiver beaches will be significantly altered~~ possible that long term impacts will not occur or that the slope of the receiver beaches will not be significantly altered.

9. On Page 20 of the staff report, the second complete paragraph shall be revised as follows:

   …At Fletcher Cove, in Solana Beach, there was also minimal change pre- and post-nourishment. However, anecdotal evidence, in the form of conversations with lifeguards and local surfers, indicated that surfing outside the camera observation area at Fletcher Cove may have actually improved following the beach replenishment. Fletcher Cove has different characteristics than the Oceanside surf spots in the vicinity of the subject replenishment program and is not necessarily indicative of how surfing will be impacted in Oceanside.

10. On Page 21-22 of the staff report, the pre and post construction surf monitoring requirements shall be revised as follows:

    - Pre-Construction
      - Quantitative monitoring
        - Duration: ~~14 days~~ 2 months…
      - Qualitative monitoring
        - Duration: ~~14 days~~ 2 months…
    - Post-Construction
      - Quantitative monitoring
        - Duration: ~~14 days to~~ 2 months ~~depending on scale of project and persistence of impacts~~…
      - Qualitative monitoring

- Duration: ~~14 days to~~ 2 months ~~depending on scale of project and persistence of impacts~~…

11. On Page 36 of the staff report, the third complete paragraph within the Public Notification Process shall be revised as follows:

    In addition, the City will place a large sign or signs (minimum size 2 ft. by 3 ft.) on the beach at the receiver site beginning two weeks prior to start of a replenishment project with a description of the project and contact information for any questions or comments. The sign(s) will be maintained in place during all placement activities.

12. On Page 38 of the staff report, the Surf Monitoring section within the Public Notification Process shall be revised as follows:

    Pre-construction Baseline Monitoring: ~~½~~ 2 months prior, 3 times per week over ~~14 days~~ 2 months…
    Post-construction Monitoring: ~~½ month to~~ 2 months post-construction monitoring 3 times per week~~, depending on scale of project and persistent impacts~~…

Surfrider Foundation, San Diego County Chapter
9883 Pacific Heights Blvd, Suite D
San Diego, CA 92121
Phone (858) 622-9661 Fax (858) 622-9961

EXHIBIT NO. 7
APPLICATION NO.
6-15-0986
Comment Letter
California Coastal Commission

January 8, 2016

Delivered via email

To: Eric Stevens
California Coastal Commission
7575 Metropolitan Drive Ste 103
San Diego, CA 92108-4402

Re: Item Th17b, Application No. 6-15-0986 City of Oceanside sand replenishment program

Dear Mr. Stevens,

The Surfrider Foundation San Diego County Chapter recognizes beaches as a public resource held in the public trust. Surfrider Foundation is an organization representing 250,000 surfers and beach-goers worldwide that value the protection and enjoyment of oceans, waves and beaches. For the past decade, San Diego Chapter has reviewed and commented on sand replenishment projects and policy in San Diego County. We appreciate the opportunity to provide comments to the California Coastal Commission about these important issues.

We have already been in contact with the city of Oceanside regarding the sand replenishment program to allow for the processing of multiple beach replenishments projects over a 5 year period and they have been a very cooperative partner. We support the City Oceanside's decision to split the replenishment into two receiver sites instead of one. Placing smaller volumes of sand in multiple sites should help to minimize negative impacts to surfing. In addition to these productive conversations, we have a few additions and requests for this project.

1. Surf Monitoring

We are happy to see that surf monitoring will be an integral part of these beach replenishment projects going forward. Pages 20-22 of the staff report describe the duration and description of pre-construction, during-construction, and post-construction quantitative monitoring. We request that the duration of the monitoring in both the pre-construction and post-construction phases be increased from 14 days to at least 2 months. 14 days is not sufficient time to accurately measure the pre-construction baseline waves and the impact replenishment would have on the post-construction waves.

2. Public Notification

On page 36, Public Notification Process, we believe that the sign size should be specified. 'Large signs' is too subjective - the signs should be at least 4 feet by 4 feet to ensure people notice them.

3. Impacts to Surfing

The previous regional sand replenishment projects had very negative impacts on surfing in Oceanside. However, on page 19-20, the staff report states the following:

Surfrider Foundation, San Diego County Chapter
9883 Pacific Heights Blvd, Suite D
San Diego, CA 92121
Phone (858) 622-9661 Fax (858) 622-9961

> "At Fletcher Cove, in Solana Beach, there was also minimal change pre- and post-nourishment. However, anecdotal evidence, in the form of conversations with lifeguards and local surfers, indicated that surfing outside the camera observation area at Fletcher Cove may have actually improved following the beach replenishment."

Conditions at Fletcher Cove do not reflect the reality experienced in Oceanside so it would be more accurate if the record reflected this. Given the severe negative impacts from previous replenishment projects, we don't believe the City of Oceanside should assume the following (page 19):

> "...due to the relatively small amount of sand material expected to be associated with individual projects, coupled with the restrictions established to ensure that the grain size from any replenishment project is similar to existing beach sand profiles, it is **unlikely** that long term impacts **would** occur or that the slope of the receiver beaches **will be** significantly altered." (emphasis added)

We appreciate that the restrictions on grain size and reduced volumes will likely better protect surfing resources, but it would be more accurate to state as follows:

> "...it is **possible** that long term impacts **will not** occur or that the slope of the receiver beaches **will not be** significantly altered."

Thank you for the opportunity to provide comment on this important issue.

Sincerely,

Michael Pinnick
Resident of Oceanside

Julia Chunn-Heer
Policy Manager
San Diego County Chapter of the Surfrider Foundation

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Th17b

Filed:	9/18/2015
180th Day:	3/16/2016
Staff:	E. Stevens-SD
Staff Report:	12/17/2015
Hearing Date:	1/14/2015

STAFF REPORT: REGULAR CALENDAR

Application No.:	**6-15-0986**
Applicant:	**City of Oceanside** **Attn: Richard Greenbauer**
Agent:	Brian Leslie
Location:	On the sandy beach between Seagaze Drive and Pine Street and between Oceanside Boulevard and Loma Alta Creek, Oceanside, San Diego County.
Project Description:	Implementation of a sand replenishment program to allow for the processing of multiple beach replenishment projects over a 5 year period. The proposed project would allow the placement of up to 150,000 cubic yards (cy) of opportunistic sand per year on the beach.
Staff Recommendation:	Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending approval of the proposed development with conditions. The primary coastal issues involved with the proposal are potential impacts to public beach access and surfing

resources, potential impacts to biological resources located both nearshore and on the sandy beach, and increased turbidity.

In 2008, the City of Oceanside obtained coastal development permit (CDP) #6-07-027 from the Commission to implement an opportunistic beach fill program (OBFP). The beach replenishment program allowed for placement of 150,000 cubic yards (cy) of sand annually for a five year period along the Oceanside shoreline south of Forster Street for a distance of up to 5,000 ft. The maximum annual sand replenishment volume was established by the 2009 Coastal Regional Sediment Management Plan for the San Diego Region. The program was designed to capitalize on opportunities to obtain surplus sand from upland construction, development, or dredging projects, as they arose, and to place the sand along the shoreline instead of losing the material to an inland disposal site. As approved, projects that fell within the program parameters, which included maximum amounts of sand, deposition methods, seasonal placement restrictions, and grain size criteria, could be found by the Executive Director to be consistent with the subject permit and allowed to proceed without additional approval from the Commission. Projects which did not meet the standards of the program or projects that raised any additional potential for impacts to coastal resources would have required further review and approval by the Commission through a separate CDP or amendment. During the five year period of the beach replenishment program (November 2008 through November 2013) the City did not undertake any opportunistic replenishment projects and the five year authorization term of the CDP has expired. Exhibit 6 includes the special conditions of the City's 2008 opportunistic sand program CDP.

The City of Oceanside is now proposing that the Commission authorize a new CDP for the beach replenishment program for an additional five year period. As proposed, a maximum of 150,000 cubic yards (cy) of sand would be allowed to be placed annually, which is consistent with the previously approved OBFP for the City of Oceanside. The maximum volume of sand that could be placed during the five-year permit term is 750,000 cy. However, near shore resources are scarce offshore of the proposed receiver site and adverse impacts are not expected.

The City is proposing multiple modifications to their initial beach replenishment program CDP:

First, the City proposes to reduce the length of the previous receiver site (southern receiver site) and to add a second receiver site (northern receiver site). The new proposed northern receiver site is located between Seagaze Drive and Pine Street and is approximately 1,500 ft. long. The new receiver northern receiver site has not been previously used for beach replenishment. The modified southern receiver site is located between Forster Boulevard and the outlet of the Loma Alta River and is approximately 2,000 ft. long. The proposed southern receiver site is located entirely within the receiver site approved for Regional Beach Sand Project 1 (RBSP 1) in 2001 and for Regional Beach Sand Project 2 (RBSP 2) in 2012 (Exhibits 1-3). The total linear foot length of RBSP 1, RBSP 2, the previous OBFP and the proposed OBFP are 5,000 ft., 4,400 ft., 5,000 ft., and 3,500 ft., respectively.

Second, the City proposes to shorten the window of time each year that sand will be placed at the receiver sites from the previous year-round condition to a restricted 5.5-month placement period, in order to avoid prime summer beach use time, to avoid nesting/spawning of grunion and shore

birds, and to replicate the natural process of sediment delivery to the coast during the fall and winter.

Third, the City has proposed to reduce the maximum percent fine-grained particles (fines) from a previous maximum of 25-40 percent, to a proposed maximum of 20 percent, that does not exceed the existing grain size envelope by greater than 10 percent. The City has also proposed that the maximum grain size will be restricted as follows: a maximum of 10 percent of placement material may exceed a grain size greater than 2 millimeters (mm) in diameter, a maximum of 5 percent greater than 4.76 mm in diameter, and a maximum of 1 percent greater than 19 mm in diameter. Restricting sand to lower percentages of fine and coarse grain sizes will help to reduce turbidity impacts and more closely mimic the existing sand profiles on the City's beaches.

As conditioned, the City will implement all projects constructed under this beach replenishment program consistent with the parameters as detailed in the preliminary Project Notification Report (Appendix B). The Project Notification Report includes a framework that will be submitted for review by the Executive Director of the Commission prior to implementation of each beach replenishment project. The Project Notification Report includes parameters for maximum sand placement volumes during the five year permit term, types of approved sand placement methods, seasonal restrictions on sand placement, physical and chemical sand parameters, trash and debris management, transport and traffic management, water quality best management practices, and public notification. Also, included in the Project Notification Report is a summary of past and foreseeable beach replenishment projects in the City (at this time the City does not expect any other replenishment projects to occur during the five year permit term), identification of the report submittal requirements, and an assumption of risk statement for each beach replenishment project. The Project Notification Report further details the pre-, during, and post-construction monitoring requirements for each beach replenishment project. Additionally, monitoring is required for surfing, turbidity, sand grain size and sand contaminants, traffic, and trash and debris.

Other conditions of this permit authorize the beach replenishment program for a period of five years (January 2016 through January 2021); and notify the City that this permit is only for the placement of sand on the designated receiver beaches and that if the sand is sourced from within the Coastal Zone, a separate CDP or amendment will be required.

This CDP also provides a methodology for the City and the Commission to track and monitor all of the various beach replenishment projects that occur in the City over the next five years. In addition, the maximum placement limits that have been proposed for the City's beaches over the five year permit term will further lower the potential for impacts from beach replenishment projects. As conditioned, if monitoring shows adverse impacts or if maximum placement limits are proposed to be exceeded, an amendment to this permit will be required that may include more intensive monitoring requirements.

The proposed beach nourishment program is consistent with and implements many of the recommendations of the Commission's recently approved Sea Level Rise Policy Guidance document (SLR Guidelines). Sea level rise will result in changes to sediment availability on California beaches. Higher water levels and changing precipitation patterns could change erosion

and deposition patterns. Loss of sediment could worsen beach erosion and possibly increase the need for beach nourishment and decrease the effectiveness of beach nourishment if sand is quickly washed away after being placed. Beach nourishment is a “soft” armoring solution which can help to protect a coastline from coastal hazards without the need for a permanent shoreline protective device. The Commission’s SLR Guidelines recommend that local jurisdictions establish beach nourishment programs and protocols. The subject beach nourishment program includes many of the suggested protocols, including criteria for design, construction and management of the nourishment area, sand compatibility specifications, seasonal restrictions, and identification of environmentally preferred locations for deposits. The SLR Guidance suggests that the Commission produce additional guidance documents related to beach nourishment. The monitoring results of the proposed program will further the Commission’s understanding of beach nourishment projects and be useful in refining future beach nourishment programs throughout the state.

The project has been designed and conditioned to avoid impacts to sensitive habitat, public access and recreation, and as conditioned, no adverse impacts to coastal resources are anticipated.

Commission staff recommends **approval** of coastal development permit 6-15-0986 as conditioned.

TABLE OF CONTENTS

APPENDICES

EXHIBITS

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 6-15-0986 subject to the conditions set forth in the staff recommendation.*

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves coastal development permit 6-15-0986 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment**. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Final Project Notification Report Template.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the City shall submit for review and written approval by the Executive Director, a final Project Notification Report Template in substantial conformance with the preliminary Project Notification Report Template (attached as Appendix B).

The City shall comply with the procedures and submittal requirements outlined in the approved Project Notification Report. Any proposed changes to the approved Project Notification Report shall be reported to the Executive Director. No change to the Project Notification Report shall occur without a Commission-approved amendment to the permit unless the Executive Director determines that no such amendment is legally required.

2. **Approval of Excavation/Dredging Site.** The subject permit is only for sand replenishment projects. All other development proposals that may be involved in obtaining the sand source, including but not limited to non-exempt grading, new construction or dredging, if located within the Coastal Zone, shall require the approval of the Coastal Commission or the applicable local government through a coastal development permit or an amendment to this permit, unless such development is exempt from permit requirements under the Coastal Act and its implementing regulations.

3. **Scope and Term of Permit Approval.** The development authorized by this CDP amendment is limited to beach nourishment that is consistent with the project limits identified in the preliminary Project Notification Report including, but not limited to, the placement sites, maximum quantities of beach nourishment, seasonal limitations on placement, and methods of delivery. The authorization for continuing development pursuant to this permit amendment shall expire five years from the date of Commission approval of CDP No. 6-15-0986.

4. **Five Year Maximum Sand Placement.** The maximum sand placement volume during the five year permit term is 750,000 cubic yards, with an annual maximum placement volume not too exceed 150,000 cubic yards. Sand placed on the City's beaches which is not a part of the beach replenishment program is also subject to the identified annual and five year maximum sand placement volumes for each site (excluding ongoing Army Corps of Engineers (USACE) Harbor Dredging Project). The City shall prepare a database to track the beach nourishment volumes being placed within the City and at the two receiver sites. If the City and/or any other party propose cumulative sand placement volumes that exceed these identified maximum amounts within either of the receiver sites (or elsewhere on the City's beaches), an amendment or a new CDP will be required by the responsible agency.

IV. FINDINGS AND DECLARATIONS

A. PROJECT HISTORY / DESCRIPTION

The City of Oceanside is proposing to extend their previously approved, but now expired, beach replenishment program to allow for the processing of multiple beach replenishment projects for a five-year period. The proposed beach replenishment program would extend from January 2016 through January 2021 (Special Condition 3). The City must submit a Project Notification Report (Appendix B) for each proposed opportunistic sand project during the five year period to the Executive Director, for review and written approval, before the City will be authorized to commence construction of an individual project. The program is designed to capitalize on opportunities to obtain surplus sand from upland construction, development, or dredging projects, as they arise, and to place the sand along the shoreline through a streamlined process, instead of losing the material to an inland disposal site due to the sometimes lengthy processing time for necessary permits from the various agencies.

The purpose of the project is to provide enhanced public recreational opportunities and public access at the City's beaches, and to increase protection of public property and infrastructure at risk from shoreline erosion. In 1993, SANDAG prepared the *Shoreline Preservation Strategy for the San Diego Region* (Strategy), which identified regional coastal areas with critical shoreline problems and recommended a strategy to address the issue. The strategy involved various components including beach replenishment, sand retention structures, property protection structures, and policies regarding the use of the shoreline and bluff tops. In March 2009, SANDAG prepared the *Coastal Regional Sediment Management Plan* (Plan) for the San Diego Region. The Plan uses the Strategy as a baseline to guide the level of comprehensive nourishment needed for the San Diego region over the next 50 years. Recently, the Coastal Sediment Management Workgroup prepared the *2010 California Beach Erosion Assessment Survey*. The survey provides a listing of Beach Erosion Concern Areas (BECA) throughout California which identifies beach erosion problem areas. Both of the receiver beaches for the current project are identified as BECA in the *2010 Beach Erosion Assessment Survey*.

The Commission has approved a number of beach replenishment projects within the City of Oceanside during the past approximately 25+ years. As further detailed in the Project Notification Report, Appendix B, notable replenishment projects include: RBSP 1 which placed 421,000 cy of sand at one Oceanside receiver beach in 2001; RBSP 2 which placed 292,000 cy of sand at one Oceanside receiver beach in 2012. In addition, the Commission has approved annual bypass dredging of the Oceanside Harbor (USACE Harbor Dredging Project) for the past 20+ years. The USACE Harbor Dredging Project has resulted in placement of between 80,000 and 438,000 cy of sand per year on Oceanside's beaches and in the nearshore area (water depths of 15 to 25 ft.). Most recently, in 2012, the Commission concurred with the USACE negative determination for a seven year project duration which allows dredging and placement of up to 500,000 cy of sand annually on the beach and nearshore area to the south of the Oceanside harbor (ND-013-12/USACE).

The subject permit is intended to expedite the implementation of beach sand replenishment projects over the next five years by establishing a set of detailed and rigorous criteria and parameters under which future potential sand sources could be evaluated. If a particular sand source meets the criteria, placement of that sand will be able to be approved by the Executive Director under the subject permit. If any particular sand source falls outside the criteria outlined herein, or any other potential risks to coastal resources not identified and discussed in this report were identified by Commission staff, a separate CDP or amendment would be required. The proposed permit amendment is based on very similar opportunistic sand replenishment permits approved by the Commission for the Cities of San Clemente (CDP #5-02-142 and #5-02-142-A1), Carlsbad (CDP #6-06-48 and #6-06-048-A1), Oceanside (CDP #6-07-27) Solana Beach (CDP #6-08-38 and #6-08-038-A1), and Encinitas (CDP #6-08-110) and contains similar limitations and monitoring requirements. More recently in August 2014, the Commission approved an amendment to the Encinitas OBFP (6-08-110-A2) that included an expanded focus on additional identified areas of concern including grain size, timing of beach placement, and coordination between large scale beach nourishments projects. The subject permit mirrors the structure and restrictions placed on this most recent Encinitas permit.

The City proposes the following significant changes to the previously approved beach replenishment program:

First, the City proposes to reduce the length of the previous receiver site and to add a second receiver site. The receiver site previously included in the City's beach replenishment program was approximately 5,000 ft. long and located between Forster Street and Kelly Street. This southern site will be reduced to approximately 2,000 ft. in length and will be located within the previous site, between Oceanside Boulevard and the outlet of the Loma Alta River. The proposed southern site is located entirely within the receiver sites approved in RBSP 1 and RBSP 2. The new proposed northern receiver site is approximately 1,500 ft. long and is located between Seagaze Drive and Pine Street. The proposed northern site is located approximately 3,000 ft. and 1,500 ft. north of the receiver sites approved for RBSP 1 and RBSP 2, respectively. There are no Marine Protected Areas (MPAs) near the proposed receiver sites. The Batiquitos Lagoon State Marine Conservation Area is the nearest MPA and is located approximately 6.5 miles to the south.

Second, the City proposes to restrict the time each year that sand could be placed on the receiver sites. Under the previous beach replenishment program approval, sand could be placed on the beaches year-round. Instead of placing sand year-round, the subject permit amendment proposes that sand would only be deposited on the beach between September 15th and February 28th of each year (a period of 5.5 months) in order to avoid potential impacts to biological and recreational resources. This schedule also more closely mimics natural sediment delivery to the coast that typically peaks during the wet season (fall and winter).

Third, the City has proposed to reduce the maximum percent fines from a previous maximum of 25-40 percent, to a proposed maximum of 20 percent that does not exceed the existing grain size envelope by greater than 10 percent. The City has also proposed that the maximum grain size will be restricted as follows: a maximum of 10 percent of placement material can exceed a grain size greater than 2 mm in diameter, a maximum of 5 percent greater than 4.76 mm in diameter,

and a maximum of 1 percent greater than 19 mm in diameter. Restricting sand to lower percentages of fine and coarse grain sizes will help to reduce turbidity impacts and more closely mimic the existing sand profiles on the City's beaches.

Furthermore, as proposed in the Project Notification Report, the City would create a database and accounting system to track the sand volumes being placed within the City's two receiver sites and elsewhere in the City during the five year permit term. This database would track both sand placed pursuant to the beach replenishment program and any other sand placement that occurs within the City throughout the five year permit term. Special Condition 4 requires that if the City and/or any other party propose cumulative sand placement volumes, excluding the USACE Harbor Dredging Project, that exceed 750,000 cy within any of the receiver sites (or elsewhere on the City's beaches), an amendment or a new CDP will be required that may include more intensive nearshore monitoring, lagoon inlet monitoring, and other applicable mitigation elements. The maximum placement volume of 750,000 cy is consistent the 150,000 cy maximum annual placement volume established by the 2009 Coastal Regional Sediment Management Plan for the San Diego Region. The USACE Harbor Dredging Project is excluded from the total volume allowance because it has been occurring for 25+ years and no adverse impacts have been identified as a result of the project or are anticipated. In addition, the sand placed through the bypass project is located to the north of the Oceanside Pier, even further from any sensitive resources than the two proposed opportunistic placement sites.

The City proposes to provide the Commission updated reports as a part of each Project Notification Report and an additional post-project report within the year following the implementation of a subject project. These updates will document the volume and location of all sand placed within the City.

Sand Placement Methodology

Beach sand is proposed to be placed in three ways: 1) as a beach berm; or 2) directly into the intertidal area; or 3) piped onto the beach from a dredge. Exhibit 4 illustrates the beach berm and intertidal placement options for the receiver sites. The intertidal zone is approximately the area between -2 ft. Mean Lower Low Water (MLLW) to 7 ft. MLLW. As shown in the site plans for the southern and northern receiver sites (Exhibits 2-3), intertidal placement would occur between approximately -1 ft. MLLW and 6 ft. MLLW at the northern site, and between approximately 2 ft. MLLW and 5 ft. MLLW at the southern site. As proposed, intertidal placement will only occur above -2 ft. MLLW. Placing sand above -2 ft. MLLW reduces potential impacts on Pismo clams, which primarily reside in the sand at depths deeper than -2 ft. MLLW. While the Pismo clam (*Tivela stultorum*) is common in sandy areas, it was not found in the Oceanside area under either of the preceding Regional Beach Sand Projects (RBSP and RBSP II, SANDAG, 2005 and 2011, respectively).

The July 2015 Mitigated Negative Declaration (2015 MND) for the addition of the new receiver describes beach berm placement as follows:

> *"Beach berm placement has been the typical fill design used for beach nourishment in which sand is placed as a layer over the existing beach to build out (i.e., widen) the*

existing berm. The berm would be a level surface extending a certain distance from the back beach toward the ocean, then sloping gradually into the water. The elevation, width, length, and slope of the berm would vary for each project, depending upon the quantity of material to be placed and its grain size, as well as the condition of the beach at the time of material placement. This option is ideal for good quality material (i.e., less than 15% fines) with a color consistent with the native beach material."

The 2014 MND describes intertidal placement as follows:

"Intertidal placement would entail deposition of material below the mean high tide line (MHTL), which would be approximated in the field by the wrack line (i.e., line of deposited kelp or seaweed on the beach) or highest wetted line on the beach. This placement method would primarily be used for upland sources being trucked to the site. The method is ideal for material that is finer or different in color than the existing beach sand. Typically, material would be rear dumped by trucks at the receiving beach (below the MHTL) to create a linear series of mounds approximately 3 to 4 feet in height. The series of mounds parallel to the coast would be reworked by waves during the following rising tide. The same result can be achieved with tandem bottom-dump trucks depositing sand below the MHTL in a windrow.

Under this method, at high tide, sand may require that it be pushed into the surf for further dispersion. Spreading may also be required should volume of material being delivered to the beach exceed that which can be quickly reworked by waves. Further, if conditions at the beach during the time of placement do not allow trucks to access either placement area (below MHTL), the material would be deposited above the MHTL and spread in the seaward direction by a loader or bulldozer. The intertidal placement method mirrors construction methods used during the manual opening of lagoon mouths…"

At the northern receiver site, the intertidal method would include mounds of sand that would be placed at approximately the 0 ft. MLLW contour depending on the site conditions at the time. These mounds of sand would extend along the length of the project site. The berm option at the northern receiver site would generally involve placing sand as a layer over the existing beach with a finished surface elevation of +12 ft. MLLW along the length of the project site. The proposed haul routes for the northern site would be via Coast Highway, North Pacific Street, Seagaze Drive, The Strand, and Wisconsin Avenue, with ingress/egress at the intersection of Seagaze Drive and the Strand North and at the Tyson Street public access point (Exhibit 2). The staging area for northern placement site will be determined by the City and reviewed by the Executive Director as a part of a future Project Notification Report, prior to the start of any nourishment project.

At southern receiver site, the intertidal method would also include mounds of sand that would be placed at approximately +5 to +10 MLLW and would extend along the length of the project site. The berm option at southern site would generally involve placing fill as a layer over the existing beach with a finished surface elevation of +12 ft. MLLW and would create a berm for the length

of the site. The proposed haul routes for the southern site would be via Oceanside Boulevard, Pacific Street, Cassidy Street, Coast Highway, and Vista Way, with ingress/egress at the existing concrete ramp at the terminus of Oceanside Boulevard (Exhibit 3). The staging area for southern placement site will be determined by the City and reviewed by the Executive Director as a part of a future Project Notification Report, prior to the start of any nourishment project.

The maximum number of 14 cubic yard capacity truck trips that could be incorporated into the project for either of the receiver sites is calculated to be 179 trips per day (approximately 22 trucks per hour). Based on a total volume of 150,000 cubic yards, optimized project duration would be approximately 10 weeks. Construction activity would be restricted to occur between 8:00 AM and 4:00 PM, Monday through Saturday; no work would occur on holidays or during the summer. In addition, truck operations per nourishment project would be limited to a maximum of 10 weeks.

Sand may also be piped onto each of the receiver sites from a hopper dredge or a cutterhead dredge. A hopper dredge was used for RBSP I and for RBSP II and involved sand placement from an offshore borrow site. Due to its size, draft, and space requirements, hopper dredges are generally not suited to working in shallow water areas such as lagoons.

If a hopper dredge is used, sand will be sucked up into the hopper dredge from the borrow site. The hopper dredge then travels to a stationary mono buoy (floating platform) which is anchored to the seafloor, where a floating or submerged approximately 30 in. diameter pipe (perpendicular to the shoreline) transports a mixture of the dredged sand and sea water to the beach; or the hopper dredge can bypass the mono buoy and connect directly to the pipe. Sections are then added to the original pipe (parallel to the shoreline on the upper beach) as the sand is pumped and spread further down the receiver site, making the pipe into an “L” shape. The sand is discharged within training dikes (berms of sand) that allow the water to drain out, increasing the amount of sand that stays on the receiver site and decreasing turbidity. The sand is redistributed on the beach with scrapers and bulldozers. The hopper dredge may need to make numerous trips between the source site and the mono buoy for each receiver site, as it can only hold 2,000-5,000 cubic yards of sand at a time.

Unlike the hopper dredge, a cutterhead dredge typically remains at the dredge site for the entire operation and uses long pipes to transport a mix of sand and seawater to the receiver sites. For sites that are located greater distances from the borrow site, the cutterhead dredge would need to transit to the receiver site to unload. Floating/submerged piping associated with the cutterhead dredge would be subject to wave action and high tides and may need to be disassembled 2-3 days prior to predicted large waves or extreme tides.

If a dredge is used, the offloading pipeline would not impact any sensitive nearshore habitat, as the area seaward of the receiver sites is composed almost entirely of sand. In order to facilitate efficient construction of the sand delivery pipeline, excess pipelines are proposed to be staged on the beach near the respective receiver sites during sand placement. No trucks or other mechanized equipment necessary to spread the material (i.e. loaders, dozers, etc.) would be staged on the beach.

The City will coordinate with Commission staff, resource agencies, and the public for each individual project to determine whether to allocate sand to both receiver sites or to place sand at only one receiver site. Factors that will be considered include the current beach profile and need for sand at each receiver site, adjacent construction activities that would complicate sand delivery, and any other environmental or public access and recreation concerns identified at that time. Receiver site selection and the methodology used to determine sand allocation will be detailed in the Project Notification Report for each replenishment project.

Sediment Analysis

All potential sand projects would have to undergo several stages of future project review at the City. The bulk of the testing and review of potential sand sources would take place at the City of Oceanside prior to the project being submitted to the Executive Director. When a beach fill opportunity is identified (e.g. a developer notifies the City when excess fill material from a construction project is available, or City staff identifies it as part of reviewing development project submittals), the City would first either review existing data about the available fill material, or conduct an initial screening test of the fill material to determine if it has the potential to meet the criteria to be placed on the beach. The review includes an assessment of possible pollutants, contaminants, grain size, and color, and compares it against existing condition at the subject receiver site.

Sediment Gradation (grain size) would be tested at both the source and receiver sites prior to each beach replenishment project. The 2015 MND proposes the following method to determine grain size on receiver beaches:

> *"…The City shall conduct an evaluation to establish gradation baseline (i.e., composite grain size envelope) from two shore-perpendicular transects for the receiving beach prior to placement…"*

The City has proposed that the maximum proportion of fine-grained particles to total volume that could be placed on the beach be 20%. In addition, the City has proposed that the maximum percentage of fines will be within 10% of the receiving beach grain size envelope. Fine-grained particles, or 'fines,' are defined in the Unified Soils Classification table as silt or clay and have a diameter less than 0.074 mm. The Commission is not aware of any established regulations pertaining to the maximum allowable percentage of silt and clay for beach replenishment projects; however, the Environmental Protection Agency (EPA) and USACE have established an 80/20 coarse-to-fines 'rule-of-thumb' ratio. This ratio requires that 80% of replenishment material must be sand, while 20% can be finer material consisting of silt and clay. As proposed, the maximum allowed percentage of fines is consistent with the "80/20 rule." More recently the USACE, in its 2006 Coastal Engineering Manual (Part V, Chapter 4: Beach Fill Design) states that "The presence of very fine sand, silt, and clay in small amounts (generally less than 10 percent) is acceptable, but sources having a substantial amount of fines should be avoided if other more suitable sources are available. The manual goes on to state that:

> *"…One of the main considerations in selecting a borrow source is the similarity between the grain size distributions of the borrow material and the native beach, i.e., the borrow material's compatibility with the native material…"*

The City has provided grain size envelopes from samples taken in 2012, in support of the USACE Harbor Dredging Project. The grain size envelopes show that the existing percentage of fines at each of the beaches ranges from a minimum of approximately 0% near the back beach and a maximum of approximately 23% near the depth of closure (-30 MLLW).

The City has also specified the maximum proportion of large grained material ('course sand,' 'fine gravel,' 'course gravel,' and 'cobble') that can be placed as a percentage of total project volume. The United Soils Classification table defines 'coarse sand' as between 2 mm and 4.76 mm in diameter. 'Fine gravel' is defined as between 4.76 mm and 19 mm in diameter and is roughly the size of a pea. 'Course gravel' is defined as between 19 mm and 76 mm in diameter and is roughly the size of a lemon. 'Cobble' is defined as anything greater than 76 mm in diameter. The grain size envelopes provided by the City for the receiver beaches show that more than 95 percent of the existing sand is smaller than 2 mm. Thus, the majority of the existing beach sand is either classified as 'fine sand' (0.074 mm to 0.42 mm in diameter) or 'medium sand' (0.42 mm to 2.0 mm in diameter).

The City has proposed the following limits on coarse materials. The limits included below are not cumulative, such that in all scenarios at least 90 percent of the total project volume will consist of material with a diameter smaller than 2 mm:

- The maximum amount of 'course sand' can be up to 10% of the total project volume
- The maximum amount of 'fine gravel' can be up to 5% of the total project volume
- The maximum amount of 'course gravel' and 'cobble' can be up to 1% of the total project volume

A sand source must first meet the criteria required by the Project Notification Report, as identified in the preceding paragraphs. Then, more stringent testing would be conducted through development of a Sampling & Analysis Plan (SAP) prepared for and approved by the USACE. Sand must be free of contaminants and chemical hazards based on Tier I testing protocol as specified by the USACE and EPA. Sand must be chemically inert and not possess characteristics that would adversely affect water quality, including temperature, dissolved oxygen, or pH. The results of these analyses would be distributed to the USACE and EPA for review and approval and the Executive Director would be copied on these submittals as a part of the Project Notification Report for each replenishment project.

If the potential sand project is determined to be consistent with all of the required parameters, the City would submit a Project Notification Report for a particular sand deposition project for the approval of the Executive Director, as well as the other relevant resource agencies (i.e., the Regional Water Quality Control Board, the State Lands Commission, the USACE, and the California Department of Fish and Wildlife). Information submitted would include all of the detailed information involved in performing the above analyses, to inform the Executive Director's determination of whether the project conforms to the project requirements.

Thus, at the time any particular project is submitted for the Executive Director's approval, there would be information on the composition, chemistry, and grain size of the sand source material; site-specific details on the condition of the receiver beach; the timing and size of the project; the deposition method; staging locations and truck routes; a monitoring program; and a public notification program. The Executive Director may only approve projects which met the specific standards for each of these required items could be approved under the subject permit. An individual sand replenishment project cannot commence without a written affirmative approval from the Executive Director. If any particular sand source falls outside the criteria outlined in the Project Notification Report, or other potential risks to coastal resources not identified and discussed in this report are identified by Commission staff, a separate CDP or amendment to the subject permit would be necessary.

Also included at this stage of project review would be a public notification package associated with the particular sand placement project. Notification would be achieved through notices in local newspapers, direct mailings, utility bills, or local television announcements. In addition, the City will place a large sign or signs on the beach at the receiver site beginning two weeks prior to start of a replenishment project with a description of the project and contact information for any questions or comments. The sign(s) will be maintained in place during all placement activities.

After a sand placement project is completed, all of the pre- and post-construction surveys and monitoring as detailed in the Proposed Notification Report are required to be submitted as a final report to the Executive Director, to evaluate the impact of the particular project and to aid in the review of future projects under the subject permit. Additionally, a Post Discharge Report will be prepared and submitted to the Executive Director and other resource agencies, which will include all of the information collected by the City for the project, including all preparation testing, volume of material placed at the site, transportation and construction details, finalized project schedule, and monitoring results.

The City of Oceanside has a certified Local Coastal Program. The proposed project will be located seaward of the Mean High Tide Line (MHTL) within the Commission's original jurisdiction and landward of the MHTL within the City's coastal permit jurisdiction. Since a portion of the project lies within the City's permit jurisdiction (e.g., access points to the beach, staging areas and sand placement above the MHTL) the City has requested that the subject application be consolidated to include all portions of the project within its jurisdiction so as to authorize the Commission to approve the project in its entirety. Section 30601.3 authorizes the Commission to process a consolidated CDP application when requested by the local government and approved by the Executive Director for projects that would otherwise require a CDP from both the Commission and from a local government with a certified LCP. The Executive Director has approved the City's request.

The policies of Chapter 3 of the Coastal Act provide the legal standard of review for a consolidated CDP application submitted pursuant to Section 30601.3, with the local government's certified LCP used as guidance. This consolidated CDP covers all of the proposed development, and no separate CDP will be required from the City.

B. PUBLIC ACCESS AND RECREATION

Many policies of the Coastal Act address public access. The following are most applicable to the proposed development and state, in part:

Section 30210

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

(l) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,

(2) adequate access exists nearby...

Section 30213

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred....

Section 30214(a)

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

Section 30220

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30233(b)

(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable long shore current systems.

The shoreline and beaches are valuable assets to the environment and economy of the Southern California region and the State, worthy of special protection and enhancement. Beach erosion has been an increasing problem in the Southern California region, and in many past projects the Commission has identified beach replenishment as a means to preserve and enhance the recreational capacity and property protection for the region's shoreline. Additional sand on beaches increases the amount of recreational area available for public uses and provides a buffer (a wider beach) between waves and adjacent public and private development, thereby reducing pressure to construct shoreline protective devices which can adversely affect the visual quality of scenic coastal areas, shoreline sand supply, public access to the beach, and beach ecology. There is a growing body of evidence that there has been an increase in global temperature and that acceleration in the rate of sea level rise can be expected to accompany this increase in temperature. The Commission's Sea Level Rise guidance document found that the best available science suggests that sea level could rise by as much as 5.5 feet by the year 2100.[1,2] On the California coast, the effect of a rise in sea level will be the landward migration of the intersection of the ocean with the shore, leading to a faster loss of the beach, as the beach is squeezed between the landward migrating ocean and the fixed backshore. This will expose the back bluff or the armored shoreline to more frequent wave attack, increasing the rate of erosion of unarmored bluffs and potentially reducing available usable beach area.

The project is expected to have some temporary adverse impacts on public access and recreation. The deposition sites are popular public beaches and are currently used for various recreational

[1] The 2012 National Research Council's Report, *Sea Level Rise for the Coasts of California, Oregon and Washington: Past Present and Future*, is currently considered the best available science on sea-level rise for California. The NRC report predicts that for areas south of Cape Mendocino, sea level may increase between 16.56 and 65.76 inches between 2000 and 2100 (NRC, 2012).

2 California Coastal Commission Sea Level Rise Policy Guidance – Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits – Adopted August 12, 2015.

activities including swimming, surfing, fishing, sunbathing and jogging/walking. During construction, the beach fill site would have to be closed, creating a temporary adverse impact on recreation. The impact might be significant during higher tides or for projects where the entire beach area would be closed to the water line such that people could not get past the work area to the rest of the beach except by traveling inland around the construction area.

However, as proposed in the Project Notification Report, sand replenishment activities will be limited to Monday through Saturday, excluding holidays and can only occur between September 15th and February 28th of each year, outside of peak summer use of beaches by the public. In a worst-case scenario, for example, if the entire permitted fill amount was placed on the beach during a single-beach fill project, access to that beach would be restricted for approximately 10 weeks during the construction window of September 15th to February 28th. Individual replenishment projects would likely be much smaller and require much shorter construction periods than the maximum allowed. The total maximum allowed amount of sand might not even be placed during the five year permit term at all, which would also reduce construction related impacts. In addition, these receiver sites represent a small portion of available beach access in the City, and the public will continue to have access to beaches north and south of the deposition sites and on Sundays and holidays.

The project could have an adverse impact on public access and recreation if construction vehicles significantly impacted the ability of the public to reach the shoreline. Overall, access corridors and staging areas are required to be located in a manner that has the least impact on public access and traffic flows on coastal access routes. Staging areas for individual projects may be located in public parking lots or on public streets. The City has not yet determined where staging for the project will occur. Use of public parking areas for staging is not expected to adversely impact public access because all work will occur in the fall and winter and will avoid peak beach use seasons. In addition the proposed Project Notification Report requires that the minimum number of spaces be used. Since the proposed haul routes utilize some of the City's primary coastal access routes, traffic could be adversely affected. To limit those impacts, the primary work schedule is proposed to be for Monday through Saturday, excluding holidays, and outside of the summer season. Thus, as proposed in the Project Notification Report, the project has been designed to minimize adverse impacts to the beach-going public.

The proposed project also includes a public notification package to inform the public prior to the initiation of any sand replenishment project, which will help reduce the potential impact the project could have on access. The proposed public notification measures do not specifically include a requirement for a public hearing on each individual opportunistic sand project; however, all new development that might be associated with sand removal activities within the City of Encinitas requires local approvals such as a CDP which would then require public notification. Therefore, any development within the City of Oceanside that includes the export of opportunistic sand to be placed on the beach will have public notice through the local CDP approval process or other local discretionary action.

Thus, any local concerns on individual construction projects that become the source of beach quality sand will be able to be addressed prior to the Executive Director's review. As proposed, all written correspondence received by the City regarding the project and minutes of the Planning

Commission/City Council meetings will be included in the Project Notification Report for the Executive Director's review. To further limit adverse impacts on access, each construction site will be posted with a notice indicating the expected dates of construction and/or beach closures. Thus, the public will have adequate opportunities to be notified of, and provide input on future replenishment projects.

Surfing

Surfing occurs throughout the project area. The Oceanside Pier surf spot is located approximately 700 ft. to the north of the northern placement site, the Buccaneer Beach surf spot is located directly adjacent to the south of the southern placement site, and the Cassidy Street surf spot is located approximately 1,500 ft. south of the southern placement site. Surfing could potentially be impacted not only by restriction of access to the water during construction, but through the modification of existing sand bars by sand placement and deposition, and poor water quality caused either by turbidity generated during and after construction, or contaminants being released into the surf zone by the fill material.

The City proposes to test all potential sand sources to verify that the sand is free of contaminants prior to placement on any beach fill site. They must also perform background research of the potential for the material to possess contaminants based on Tier I testing protocol as specified by the USACE and the EPA. Therefore, the Commission does not anticipate any health threats to surfers from contamination.

Sand deposition has the potential to alter the beach profile and surfing conditions. This impact could be significant if sand deposition causes waves to close out and become less 'ride-able' over a long period of time (months), or results in a perpetual shore break at the beach rather than a nearshore bar for waves to break over. In addition, sand deposition materials can change the slope of the beach, which may change the wave climate. However, due to the relatively small amount of sand material expected to be associated with individual projects, coupled with the restrictions established to ensure that the grain size from any replenishment project is similar to existing beach sand profiles, it is unlikely that long term impacts would occur or that the slope of the receiver beaches will be significantly altered.

Surf conditions are often directly related to dynamic shifts in sand movement that occur as a result of wave energy, and therefore these long term impacts are unlikely to persist. Sand placement may; however, result in a change in surf conditions over a temporary short-term period while the sand is naturally redistributed over the bottom. The project may also result in potentially beneficial impacts to surfing by contributing sand to the nearshore that would be deposited in bars. More sand in the system provides material for enhanced sand bar formation and may result in larger or longer lasting bars, and improved surf conditions.

Pursuant to the Commission's approval of RBSP 2, a Special Condition of the CDP required that the applicant (SANDAG) coordinate with the Surfrider Foundation to develop and implement a volunteer qualitative surf monitoring and evaluation effort. The surf monitoring program consisted of five video cameras set up at various surfing location within San Diego County. Trained volunteers analyzed daily video clips for a variety of surfing parameters. In addition,

computer algorithms extracted wave parameter and shoreline estimates. Two cameras were installed in Encinitas, at the Moonlight Beach lifeguard tower and at the Cardiff State Beach lifeguard tower and three cameras were installed at Tide Beach Park and Fletcher Cove in Solana Beach and near the pier in Imperial Beach. Unfortunately, no cameras or surf monitoring was conducted for the Oceanside receiver site.

The first surf monitoring report, dated September 3, 2013, was not able to track changes in surf spot quality for RBSP 2 because beach sand placement had only been completed at one site during the initial monitoring period (October 2011 through October 2012). The second surf monitoring report, dated May 2014, was able to provide more complete data about surf spot observations at the five monitored sites. The second year monitoring report showed evidence of adverse impacts to surfing in Imperial Beach as a result of the beach fill extending into the surf zone.

At Moonlight Beach, in Encinitas, monitoring found a decrease in ride length, which could be attributed to more close-out waves as result of proximity to beach fill. However, the monitoring report found that Moonlight Beach surf observations were inconclusive, as it is also a possibility that the surf peak migrated along the beach after the infill and was outside the camera observation area. At Cardiff Reef, in Encinitas, and at Tide Park, in Solana Beach, little change was observed pre- and post-nourishment. At Fletcher Cove, in Solana Beach, there was also minimal change pre- and post-nourishment. However, anecdotal evidence, in the form of conversations with lifeguards and local surfers, indicated that surfing outside the camera observation area at Fletcher Cove may have actually improved following the beach replenishment.

Thus, surfing condition monitoring, while relatively new, has been shown to provide useful information following beach replenishment projects in San Diego County. The Surfrider surf monitoring camera network was originally funded for a period of approximately two years and is no longer occurring. However, more funding may become available and the surf monitoring program using the installed cameras and potentially additional cameras may continue for a longer time period. If that occurs, the surf monitoring program will likely provide valuable information about surfing impacts from future beach nourishment sand projects. The Surfrider foundation has offered the use of one of its surf monitoring cameras to the City of Oceanside free of charge. The City would need to find a suitable location to mount the camera and would need to take responsibility for taking surf video and analysis. Due to the fact that there is no actual project proposed at this time and opportunistic projects often have limited funding available, this CDP does not require that the City implement video surf monitoring. However, as explained previously, the past use of cameras for surf monitoring provided useful information and the Commission would be supportive of the voluntary use of surf monitoring cameras by the City.

As proposed in the Project Notification Report, in order to identify any substantial change to surfing conditions, a monitoring program will be instituted by the City for the subject beach replenishment program. The monitoring will provide qualitative information to understand if the project causes negative impacts to surfing along the Oceanside shoreline. As proposed, the monitoring will not be particularly technical or precise, but is intended rather to simply obtain a

sense from observations and periodic interviews/questioning of surfers if the program is creating adverse impacts on surfing in the area. Commission staff has coordinated with the City and with local representatives of the Surfrider Foundation to formulate the surf monitoring parameters for this project. Commission staff is not aware of any surf monitoring program that has been conducted in the past for beach nourishment projects in the City of Oceanside. Surf monitoring in Oceanside was not required pursuant to Commission approval of RBSP 1 or RBSP 2, nor was is it required in association with the ongoing USACE Harbor Dredging Project. Surf monitoring was required by the Commission pursuant to the 2008 approval of the City's opportunistic nourishment program; however no projects or surf monitoring was undertaken during the 5-year permit term.

As proposed, general surfing conditions will be observed as follows:

- Pre-Construction
    - Quantitative monitoring
        - Duration: 14 days
        - Frequency: Between 7 AM and 10 AM, 3 times per week
        - Description: Recordation of the date, approximate wave height and direction, tide, wind, water temperature and clarity, and number of surfers in the water.
    - Qualitative monitoring
        - Duration: 14 days
        - Frequency: Between 7 AM and 10 AM, 3 times per week
        - Description: Observations of wave characteristics by a surfer with 10 years surfing experience, experience with both short boarding and longboarding, and knowledge of local surf spot characteristics. Short interviews with at least 15 local surfers per week (Appendix C includes the Surfing Survey).
- During-Construction
    - Quantitative monitoring
        - Duration/Frequency: Between 7 AM and 10 AM, Every day during nourishment
        - Description: Recordation of the date, approximate wave height and direction, tide, wind, water temperature and clarity, and number of surfers in the water.
    - Qualitative monitoring
        - Duration/Frequency: Between 7 AM and 10 AM, Every day during nourishment
        - Description: Observations of wave characteristics by a surfer with 10 years surfing experience, experience with both short boarding and longboarding, and knowledge of local surf spot characteristics. Short interviews with at least 15 local surfers per week.
- Post-Construction
    - Quantitative monitoring
        - Duration: 14 days to 2 months depending on scale of project and persistence of impacts

- Frequency: Between 7 AM and 10 AM, 3 times per week
- Description: Recordation of the date, approximate wave height and direction, tide, wind, water temperature and clarity, and number of surfers in the water.

o Qualitative monitoring
- Duration: 14 days to 2 months depending on scale of project and persistence of impacts
- Frequency: Between 7 AM and 10 AM, 3 times per week
- Description: Observations of wave characteristics by a surfer with 10 years surfing experience, experience with both short boarding and longboarding, and knowledge of local surf spot characteristics. Short interviews with at least 15 local surfers per week.

The surf monitoring requirements as described above are included in the Project Notification Report and will be reported to the Commission following each replenishment project.

There is also a potential for a low level turbidity plume to occur in the water during construction activities. However, turbidity will be minimized by restricting the amount of fines in the placement sand to a maximum of 20%. In addition, the program requires monitoring of turbidity during construction. Although no significant recreational impacts are expected from turbidity, the monitoring will provide information that will allow future projects to more accurately assess and avoid turbidity related impacts.

As proposed, general recreation and access impacts (both positive and negative) will be evaluated in the post-project report to aid in the review of future nourishment projects under the subject program. If impacts are identified, the Project Notification Report identifies that any project modifications to address these impacts must first be submitted to the Executive Director in order to determine whether the proposed remedies are authorized under this CDP or whether the work shall require either an amendment to this permit or a new permit.

Conclusion

In summary, the proposed project will have short-term and temporary impacts on public access and recreation due to reduced beach access in the construction area, potential use of public parking areas for staging, and potential impacts to surfing. These impacts have been minimized by restrictions and conditions on the timing and amount of work than can occur and through required surf and turbidity monitoring conditions. The project overall is expected to have a positive impact on the beach in Oceanside as well as to the entire littoral system by adding more sand to the beach that can be used for increased recreation and public access. The proposed sand monitoring program will continue to provide information regarding the short and long-term effects of beach replenishment, including how long the sand remains on the beach at different sites in different conditions. The permit is limited to five years in duration, and further evaluation of the impacts will occur should the City request to extend the program. Therefore, as conditioned, the proposed project can be found consistent with the public access and recreation policies of the Coastal Act.

C. BIOLOGICAL RESOURCES AND WATER QUALITY

The following Coastal Act policies are applicable and state, in part:

Section 30230

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff...

Section 30233

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(l) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.

(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.

(3) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(6) Restoration purposes.

(7) Nature study, aquaculture, or similar resource dependent activities.

(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable long shore current systems.

[…]

The Coastal Act policies identified above require the Commission to address impacts on marine resources by considering the timing of deposition of the material on the beach, the composition of the material, the location of the receiver beach, and the presence of environmentally sensitive resources. Development in areas adjacent to sensitive marine habitat areas, marine parks, federal and state MPAs and recreation areas, such as beaches, must be sited and designed to prevent impacts which would significantly degrade those areas. The restoration of beaches is a permitted use in open coastal waters under Section 30233; however, the project must be the least environmentally damaging alternative, and should avoid impacts to coastal resources, and any impacts that cannot feasibly be avoided must be mitigated.

While the Commission has viewed beach replenishment as a means to address loss of public access and recreation and to protect property, the Commission is becoming increasingly aware of the potential adverse ecological consequences of this practice. Beach replenishment is often considered the most environmentally sound method of maintaining eroding shorelines. However, fill activities may cause intense disturbance and high mortality of marine life and have the potential to alter the diversity, abundance, and distribution of intertidal macroinvertebrates for months to years. Ecological recovery following fill activities depends on successful recolonization and recruitment of the entire sandy intertidal community. With this new understanding the Commission is reviewing beach replenishment projects in terms of potential ecological impacts and as the understanding of impacts from nourishment projects increase, additional special conditions to limit both physical and biological impacts to the sandy beach ecosystems may be warranted in the future.

One of the biological resource concerns raised by the project is the potential for direct burial of organisms on the beach and in the nearshore environment by the placement of sand. If persistent over a long temporal scale, these impacts could potentially shift population dynamics of these infaunal communities as well as affect available prey sources for nearshore fish and avian populations. Additionally, significant shifts in grain size conditions could also alter the physical beach environment and result in shifts in ecosystem species composition. As proposed, and identified in the Project Notification Report, parameters for maximum sand placement volumes during the five year permit term, sand grain size, timing of sand placement, and post project monitoring will reduce impacts to beach and nearshore organisms to the greatest extent feasible. In addition, due to the dynamic nature of the intertidal and beach environment, small-scale beach nourishment projects such as those proposed by the City, may result in short term impacts to the

sandy beach environment; however, over the long term, impacts are expected to be less than significant.

Another concern that is typically raised by beach nourishment projects is the indirect effects from where and how much material will be transported by waves through the littoral system, and the resultant potential to temporarily or permanently affect sensitive marine habitats. In addition, increasing turbidity in adjacent waters could adversely affect the growth of kelp and surfgrass and the foraging ability of many marine animals, including shore and seabirds. The project area also consists of Essential Fish Habitat (EFH), which can suffer adverse impacts as a result of beach replenishment projects.

However, in the case of the proposed project, no adverse impacts to biological resources are anticipated. The absence of sensitive resources at the Oceanside receiver sites was one of the considerations in selecting the subject sites for this program. The Biological Verification and Consistency Study (Study) prepared for this project in 2014 found that intertidal habitat seaward of both the Northern and Southern Placement Areas is predominantly sand, with some cobble in localized areas. Previous studies have documented minimal offshore reef formations in the subtidal area seaward of the proposed receiver sites and one high relief reef, about six feet wide, approximately 250 feet offshore north of Buccaneer beach. As shown in Exhibit 5, the prevalence of offshore reef in Oceanside is very low.

The City also submitted an Essential Fish Habitat Assessment (Assessment) for the project, dated May 2014. The assessment documented that a "…man-made substrate consisting of rip-rap which protects the Oceanside Sewer Outfall…" Exhibit 5 shows the growth of kelp on this rip-rap structure. In order to avoid any adverse impacts to the habitat on the rip-rap and other hard substrate at the southern end of the southern receiver site, the City reduced the size of the southern receiver site and the southern border is now greater than 1,000 ft. north of the sewer outfall pipe.

The proposed southern receiver site was part of the 2001 RBSP 1, which involved the placement of over 2 million cy of beach-quality sand on 12 beach receiver sites from Oceanside to Imperial Beach. The southern receiver site received 421,000 cy of sand. The potential environmental impacts of RBSP 1, which included placement of sand at the southern site, were evaluated in the Final Environmental Impact Report/Environmental Assessment (EIR/EA) for RBSP 1. The 2000 EIR/EA concluded that the project would not have any significant effects on the environment, but SANDAG was required to implement a short-term (construction) and long-term (five years) monitoring program to verify that conclusion, as well as to provide additional data regarding actual beach nourishment sand transport compared to coastal engineering models. Monitoring was conducted during construction for turbidity, spawning grunion, and underwater archaeology resources, and no adverse construction impacts were identified. Post construction monitoring of lagoons and offshore biological resources (kelp, rocky intertidal habitat, and subtidal habitat) was also undertaken following RBSP 1 and found no clear evidence of adverse impacts resulting from the beach replenishment project. However, the results of the near-shore monitoring were inconclusive and recommended that intertidal monitoring be continued for a longer time period in order to better identify impacts. Furthermore, the final monitoring report found that it was difficult, if not impossible, to distinguish RBSP 1 effects from the effects of simultaneous projects in the region. Intertidal monitoring was not continued following the required five year monitoring period.

Monitoring was conducted at 33 intertidal sites between North Carlsbad and South Solana Beach for a five year period following beach nourishment in 2001. The 2005 Final Monitoring Report observed that out of the 33 monitoring sites, three shallow subtidal sites showed possible increased sedimentation that may be attributed to RBSP 1. These sites were located in North Carlsbad, Leucadia, and Solana Beach. The Monitoring report concluded that adverse impacts of increased sedimentation at these sites caused by RBSP 1 could not be determined due to multiple other replenishment projects in the area and/or due to the relatively short monitoring duration. No intertidal monitoring was constructed in Oceanside due to the lack of offshore resources and no adverse impacts to intertidal resources are expected as a result of the currently proposed opportunistic sand program.

Lagoon Impacts

SANDAG is currently overseeing the Buena Vista Lagoon Enhancement Project and EIR. Under current conditions, tidal influence on the lagoon is severely limited by an existing, 5-foot high weir that extends across the lagoon inlet and has resulted in a freshwater lagoon system. So long as this weir remains in place, beach replenishment projects are not expected to result in any sedimentation impacts within Buena Vista Lagoon. Plan alternatives for the proposed restoration include analysis of three enhancement alternatives - freshwater, saltwater, and a saltwater/freshwater hybrid, as well as a no plan, or no changes to the lagoon. Studies analyzing the transport of placed sediments from the program within the littoral cell have not been completed at this time. For this same reason, studies analyzing the transport of placed sediments from the program within the littoral cell have not been completed at this time. However, the MND for the project states that "…should the Buena Vista Lagoon be restored into an open system configuration, and should further analysis demonstrate that sediment placed from a specific project have the potential to impact the lagoon mouth, the City will coordinate with SANDAG and other stakeholders to determine if cost-sharing for periodic lagoon mouth opening maintenance is required and the fair-share contribution of that cost." Therefore, any impacts to the Buena Vista Lagoon would be avoided.

The Agua Hedionda Lagoon inlet is located approximately 2.5 miles south of the proposed southern receiver site. The Commission most recently approved the dredging of up to 500,000 cubic yards of lagoon bottom sand within the outer basin of the lagoon and placement of sand on the beach adjacent to the lagoon inlet (Ref: CDP #6-14-1128). The Agua Hedionda Lagoon Foundation reviewed the City of Oceanside's opportunistic beach replenishment program and did not raise any concerns.

Grunion

California grunion spawn on sandy beaches in the San Diego region between March and August and have the potential to be affected by beach fill projects. In order to avoid any possible adverse impacts to grunion, the City proposes a sand placement window that restricts any sand placement during the grunion spawning season.

California Least Tern or Western Snowy Plover

In order to avoid any possible adverse impacts to California Least Tern or Western Snowy Plover, the City proposes to modify the sand placement window to eliminate any placement during the breeding and nesting seasons for either bird. Similar to the 2001 RBSP 1 and the 2012 RSBP 2, monitoring will include observations of the extent of turbidity plumes outside the surf zone where water transparency is reduced to less than three feet. While the project may cause a low-level turbidity plume in the water, the effects would be localized and temporary, and would not extend beyond the normal foraging distances for either of these species and should diminish immediately when construction activities are halted. Since ample alternative forage areas would be available to these species during receiver site construction, no adverse impacts to these species are anticipated. Restricting the silt and clay content to a maximum of 20%, will further reduce the potential for significant impacts to biological resources or water quality. Nevertheless, turbidity will be monitored throughout construction to quantify the effect on ocean water clarity from the project. In addition, no Tern or plover were observed during a March 10, 2014 biological survey of the receiver beach areas.

Grain Size

The composition of the sand replenishment material can also affect the environment through increased turbidity and potential for overly compacted beaches with sand that is too fine and through steepened beach profiles for sand that is too coarse. The Project Notification Report requires that the City test and analyze all potential beach nourishment sand sources and ensure that they have a maximum of 20% fines. This is the upper limit of what would be considered for placement on the beaches, and not a standard for all material that would be placed. The 20% cut-off for fines for smaller projects would enable the City to consider a fairly large range of potential source materials. The inclusion of up to 20% fines in the beach replenishment program will maximize the amount of potentially beneficial material that could be tested and analyzed for consideration as beach nourishment material. These limits are more conservative than the 25-40% fines allowed for the City's previously approved beach replenishment program. The Project Notification Report also specifies the maximum proportion of large grained material ('coarse sand,' 'fine gravel,' 'course gravel,' and 'cobble') that can be placed as a percentage of total project volume.

Construction Equipment and Water Quality

Construction equipment used for the project has the potential to contaminate the sand from minor spills and leaks from equipment. As proposed, construction material cannot be washed on the beach or in beach parking lots. Construction debris and sediment shall be properly contained and secured on-site with Best Management Practices (BMPs) to prevent the unintended transport of sediment and other debris into coastal waters by wind, rain, or tracking. Any debris resulting from construction activities must be removed from the project site within 24 hours of completion of construction. In addition, a spill prevention, containment and countermeasures plan must be prepared by the contractor prior to each beach fill project for projects with over 1,320 gallons of hydrocarbon liquids stored on-site. The plan must include fueling procedures, equipment maintenance procedures, and containment and cleaning measures to be followed in the event of a

spill. Thus, the project contains sufficient BMPs to ensure that no impacts to water quality will occur.

The City has also proposed that a full-time on-site debris monitor will be present during excavation and loading of trucks and at least once per day will monitor the beach during beach replenishment. If any debris or any unusual, non-sand material is detected, the City proposes to halt the specific sand placement until the sand can be examined and tested to assure its quality is consistent with the parameters of acceptable material. Therefore, as proposed, no significant impacts to water quality are expected.

As proposed by the City, copies of permits from other agencies, including the California Regional Water Quality Control Board and the USACE are required to be submitted to the Executive Director. Should any project modifications be required as a result of other permits, the Project Notification Report includes an acknowledgement that an amendment to this permit may be necessary. Special Condition 2 notifies the applicant that the subject permit does not cover the development that provides the sand source for beach replenishment, such as dredging or new construction. Those projects must receive separate coastal development permits when the source is obtained in the coastal zone.

Conclusion

In summary, the subject program has been designed to minimize potential environmental impacts to the greatest extent feasible and, as conditioned, is not anticipated to have any impacts inconsistent with Coastal Act Sections 30230, 30231, or 30233. Restrictions on placement locations, timing and quantities have been designed to avoid or limit impacts to sensitive habitat. As proposed, placement of sand only in the fall and winter mimics natural sand delivery. In addition, the intent of the opportunistic nourishment program is to facilitate multiple small projects vs. a single large project which would result in reduced impacts to the beach ecological community. Thus, significant impacts to ecological resources are not expected to result from the proposed nourishment program.

Monitoring of the beach sand profile, surfing conditions, turbidity, sediment gradation, traffic, trash and debris is required for each project undertaken pursuant to the beach replenishment program. All impacts will be identified through the proposed monitoring and any unanticipated impacts will require submittal of an amendment to this permit to allow the Commission to consider additional mitigation measures for the project. As proposed and conditioned, adequate information will be available to the Executive Director to analyze and evaluate new beach sand replenishment projects under the parameters of the proposed permit and written approval from the Executive Director is required prior to the initiation of any work for individual sand placement projects. As conditioned, the Commission finds that the proposed project minimizes environmental impacts, and if significant impacts do occur despite all precautions, they will be identified and adequately mitigated through a new CDP or CDP amendment. Therefore, the proposed project can be found consistent with the resource protection policies of the Coastal Act.

D. HAZARDS

Section 30253 of the Coastal Act states, in part:

> New development shall:
>
> (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard…

As discussed in the Public Access and Recreation section of this staff report, acceleration in the rate of sea level rise is expected along the coast of California.[3] The Commission's Sea Level Rise Policy Guidance recognizes beach nourishment as an important 'soft' armoring/green infrastructure option in California's coastal adaption to sea level rise (p. 123). As described in the Guidance document, 'soft' armoring generally refers to the use of beaches/beach nourishment, dunes, wetlands and other ecosystems that adjust to waves and help to reduce erosion and dissipate wave energy while providing other natural benefits. In contrast, seawalls and revetments that do no adjust to waves and that block wave energy and shoreline retreat are often termed hard structures.

The Sea Level Rise Policy Guidance recommends that 'soft solutions,' such as beach nourishment, be used as an alternative to the placement of hard shoreline protection in order to enhance natural resource areas. The Sea Level Rise Policy Guidance also encourages the establishment of beach nourishment programs, similar to the subject beach replenishment program, and protocols in Local Coastal Plans that identify locations where nourishment may be appropriate; establish criteria for the design, construction, and management of the nourishment area; and/or establish measures to minimize adverse biological resource impacts from deposition of material, such as timing or seasonal restrictions and identification of environmentally preferred locations for deposits.

The proposed development is located in an area subject to tidal and wave action. The coastal shoreline environment is dynamic and there are risks associated with development in such areas. For instance, erosion has occurred at the subject beaches where beach nourishment is proposed, and erosion is one form of potential geologic hazard. Coastal erosion in the project area is being exacerbated by sea level rise, and, as such, efforts by local governments and other entities to maintain and restore public beaches are increasing. The fact that the City is proposing beach nourishment to restore beach widths to pre-existing conditions indicates that erosion does occur. However, the proposed sand placement activities would not increase erosion hazards by restoring the size of beaches, and in fact, increasing the beach width may decrease risks to property and the need for more permanent shoreline protection features. As described above, testing and monitoring of the replenishment material will ensure risks to life and health from potential contaminants are minimized. Therefore, the proposed project minimizes this hazard consistent with Section 30253.

[3] The 2012 National Research Council's Report, *Sea Level Rise for the Coasts of California, Oregon and Washington: Past Present and Future*, is currently considered the best available science on sea-level rise for California. The NRC report predicts that for areas south of Cape Mendocino, sea level may increase between 16.56 and 65.76 inches between 2000 and 2100 (NRC, 2012).

Because there remains an inherent risk from the project to development along the shoreline, the City has submitted as part of the Project Notification Report, an assumption of risk, waiver of liability and indemnity that indemnifies and holds harmless the California Coastal Commission, its officers, agents and employees against any and all claims, demands, damages, costs, expenses of liability arising out of the acquisition, design, construction, operation, maintenance, existence, or failure of the permitted project. In this way, the City has made clear that the Commission is not liable for damage as a result of approving the permit for development.

E. LOCAL COASTAL PLANNING

The City has a certified LCP and will approve any necessary CDP within their jurisdiction for the individual developments that provide the source of sands. In addition, since portions of the proposed development lie landward of the MHTL within the City's coastal permit jurisdiction such as access points and sand placement above the MHTL, the City has requested that all portions of the subject application that lie within the City's jurisdiction above the MHTL be consolidated into the subject permit by the Coastal Commission. Under Coastal Act Section 30601.3, Chapter 3 of the Coastal Act is the legal standard of review for the entire project, and the certified LCP has been used as guidance. As conditioned, the proposed development is consistent with the public access, recreation, and environmental protection policies in Chapter 3 of the Coastal Act and with the City's certified LCP. Therefore, approval of the proposed development will not prejudice the ability of the City of Oceanside to continue to implement their certified Local Coastal Program.

F. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096 of the Commission's Code of Regulations requires Commission approval of a CDP to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The City prepared a Final Mitigated Negative Declaration (MND) for the Opportunistic Beach Fill Program which addressed the potential environmental impacts associated with the project. The MND found that the project would not result in any significant effects on the environments with the incorporation of mitigation measures.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures including those addressing monitoring of physical and recreational impacts, will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least

environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

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Appendix A
SUBSTANTIVE FILE DOCUMENTS

- Environmental Impact Report/Review Environmental Assessment for the San Diego Regional Beach Sand Project dated June 2000
- Regional Beach Sand Project Year 4 (2004-2005) Post-Construction Monitoring Report for Intertidal, Shallow Subtidal, and Kelp Forest Resources and Comprehensive Analysis Report (2001-2005), dated August 2005
- U.S. Army Corps of Engineers. Chapter 4: Beach Fill Design. In: Coastal Engineering Manual-part V., dated 2006
- Environmental Assessment/Final Environmental Impact Report for the San Diego Regional beach Sand Project II, dated May 2011
- National Research Council's Report, Sea Level Rise for the Coasts of California, Oregon and Washington: Past Present and Future dated 2012
- California Coastal Commission Sea Level Rise Policy Guidance, dated August 12, 2015
- Final Mitigated Negative Declaration for the Amendment to the Opportunistic Beach Fill Program (OBFP) by RECON, dated July 2015
- CDP Nos.: 6-08-038/RBSP 1, 5-02-142/City of San Clemente, 5-02-142-A1/City of San Clemente, 6-06-48/City of Carlsbad, 6-06-048-A1/City of Carlsbad, 6-07-27/City of Oceanside, 6-08-38/City of Solana Beach, 6-08-038-A1/City of Solana Beach, 6-08-110/City of Encinitas, 6-08-110-A2/City of Encinitas
- ND-013-12/USACE
- Final Coastal Regional Sediment Management Plan for the San Diego Region, Moffatt & Nichol, dated March 2009

Appendix B
Project Notification Report (PNR)

OCEANSIDE OPPORTUNISTIC BEACH FILL PROGRAM PROJECT NOTIFICATION REPORT TEMPLATE

This document presents a general outline for Project Notification Reports (or PNR's) to follow at the time a project is identified. The PNR will provide a project overview, source material description, noticing descriptions, proposed monitoring and conformance with program-level permits. The PNR goal is to acquire agency concurrence via a Notice to Proceed from all applicable agencies.

1. Introduction

This section will provide the basic program and project overview and will specify applicable permit conditions (USACE, CCC, RWQCB, and SLC). The City's program has the following placement and seasonal restrictions.

Proposed Placement Volumes and Seasonal Restrictions

Receiver Site	Maximum Placement Volume	Placement Type	Seasonal Restrictions
Northern Placement Site	150,000 per year	a) Beach-berm b) Intertidal Linear Mounds	<u>September 15 – February 28th:</u> unrestricted if <20% fines (Max % fines must be within 10% of existing grain size envelope). Coarsest limits will be defined as the material containing no more than 10%>2 mm, 5%>4.76 mm, 1%>19 mm <u>Mar 1st September 14th:</u> No placement to avoid sensitive species and high beach use season.
Southern Placement Site			
5-Year Permit Term Maximum Volume (cy)	**750,00**		

2. Project Need

Describe the need for the proposed project. Beach profile monitoring data collected as part of the Regional Beach Sand Program as well as City data will be used to describe the project need. Past

project performance may be used to empirically predict the longevity and distribution of the proposed project.

The City will coordinate with Commission staff, resource agencies, and the public for each individual project to determine whether to allocate sand to both receiver sites or to place sand at only one receiver site. Factors that will be considered include the current need for sand at each receiver site, adjacent construction activities that would complicate sand delivery, and any other environmental or public access and recreation concerns identified at that time. Receiver site selection and the methodology used to determine sand allocation will be detailed in the Project Notification Report for each replenishment project.

3. Source Material

3.1. General Site Location

Include maps, figures, and text description of site location and surrounding areas.

3.2. Specific Location of Source Material at Site

Describe where on the site the source material is found.

3.3. Volume of Material (Total volume and volume proposed for beach placement)

Describe the total volume of material available at the site and the volume that is being proposed for beach nourishment. The disposal method of excess material will be described in this section.

3.4. Material Testing

Present the Sampling and Analysis Plan that was prepared for and approved by the USACE as part of their permit conditions. The results will be provided, which will include any chemistry and grain size testing. Figures and tables will be provided.

Sand must be physically and chemically tested to verify that the material meets criteria specified in the Inland Testing Manual. Sand must be free of contaminants and chemical hazards based on Tier I testing protocol as specified by the U.S. Army Corps of Engineers (USACE) and U.S. Environmental Protection Agency (EPA). Sand must be chemically inert and not possess characteristics that would adversely affect water quality, including temperature, dissolved oxygen, or pH.

3.5. Debris Management

Describe general content of material with regard to debris. This will include a description of the kinds of debris found in the source material, methods for screening, separating, and/or retrieving the debris, and disposal methods.

A qualified on-site debris monitor (geotechnical background or similar) will be present at the source site at all times during the excavation of material to be used for beach nourishment to monitor the material being loaded into trucks for placement on the beach. The monitor will ensure, to the maximum extent practicable, that material being loaded into the trucks is free of debris. The receiving beach shall be monitored periodically on every day of sand deposition by City staff to ensure the material placed on the beach is free of debris. If any debris or non-sandy material is detected on the receiving beach, the specific beach replenishment project(s) that was/were using that sand material shall be halted at that site(s) and the contractor will be responsible for removing all debris from the beach immediately. The project will be restarted once debris is cleared from the beach and a method is formulated to ensure, to the maximum extent practicable, that no further debris is generated from the source site.

4. Transportation and Placement

4.1. Site Location and Timing

Describe the existing conditions of the beach site and the timing of project. Include projected schedule.

Construction activity shall be restricted to occur between 8:00 AM to 4:00 PM, Monday through Saturday; no work shall occur on Sundays or on Holidays.

4.2. Transportation Method

Describe how the material will get to the beach site. Outline trucking routes and provide figures, if needed. Indicate how many trucks and frequency. Specify a traffic control plan from the contractor.

4.3. Beach Placement Method

Describe the placement method, including any equipment that may be needed to construct the project. Outline specific public access closures or restrictions. Outline project BMPs, such as flagmen, perimeter fencing, etc. that are proposed. Specify if an access ramp will be constructed and how it will be removed or maintained following the project.

Construction materials or waste will not be stored where it could potentially be subjected to wave erosion and dispersion. In addition, no machinery will be placed, stored, or otherwise located in the Intertidal zone at any time, except for the minimum necessary to implement the project.

Construction equipment shall not be washed on the beach or in the beach parking lots. Construction debris and sediment shall be properly contained and secured on site with BMPs, to prevent the unintended transport of sediment and other debris into coastal waters by wind, rain, or tracking. Construction debris and sediment shall be removed from the construction areas as necessary to prevent the accumulation of sediment and other debris which may be discharged into coastal waters. Any and all debris resulting from construction activities shall be removed

from the project site within 24 hours of completion of construction. Debris shall be disposed of at a debris disposal site outside the coastal zone.

For projects with over 1,320 gallons of hydrocarbon liquids stored on-site, a Spill Prevention, Containment and Countermeasures Plan (SPCCP) must be prepared by the contractor. That plan specifies fueling procedures, equipment maintenance procedures, and containment and cleaning measures to be followed in the event of a spill.

Plans for the staging and storage of the construction equipment shall be provided by the contractor. The minimum number of parking spaces that are required shall be used. In order to facilitate efficient construction of the sand delivery pipeline (if a dredge is used), excess pipelines are proposed to be staged on the beach near the respective receiver sites during sand placement. However, no trucks or other equipment needed to spread the material (i.e. loaders, dozers, etc.) would be staged on the beach.

Access corridors and staging areas shall be located in a manner that has the least impact of public access via the maintenance of existing public parking areas and traffic flow on coastal access routes.

4.4. Contractor Information

Include Contractor name, address, contact information, etc.

5. Public Notification Process

This section will outline how the public is being notified of the overall program and this specific project. Most upland projects will be approved by the City of Oceanside Planning Commission or City Council through a public hearing. This section of the report will include a listing of the local hearing dates and copies of all the local hearing notices. All written correspondence received by the City regarding the project and minutes of the Planning Commission/City Council meetings will be included.

Other proposed public noticing methods may include City Council Meetings, Chamber of Commerce/Downtown Business Association articles, City Publications, Newspaper Articles, Signage, Public Television, or Water Billing notices.

In addition, the City will place a large sign or signs on the beach at the receiver site beginning two weeks prior to start of a replenishment project with a description of the project and contact information for any questions or comments. The sign(s) will be maintained in place during all placement activities.

6. Project Monitoring

This section will outline the pre-, during, and post-construction monitoring for the project. This section will also include the reporting protocols for the monitoring efforts as outlined in the CCC, RWQCB, USACE, and SLC permit requirements.

The City will prepare a database to track the beach nourishment volumes being placed within the City and at the two receiver sites. Volumes will be inclusive of other projects that place sand at these sites or elsewhere in the City (excluding the Army Corps of Engineers (USACE) Harbor Dredging Project) and will not exceed the volumes identified on page two of the Project Notification Report (PNR). This information will be submitted as a part of each PNR and annually to the Commission by July 15 for the duration of the term of this CDP, if a project is implemented during a given year.

The City will also summarize and provide analysis of SANDAG's Regional Beach Profile monitoring data and highlight any impacts to near shore resources that have occurred as a result of beach replenishment projects within the City. This information will be updated and submitted as a part of each PNR and annually to the Commission by July 15 for the duration of the term of this CDP, if a project is implemented during a given year.

Table 2. Summary of Project Design Features and Monitoring Actions

Monitoring Activity	Northern/South Receiver Sites	Responsible / Implementing Party	Reporting
Beach Profiles	Pre-construction Baseline Monitoring: Collection of beach profiles at two established monuments between 1 year and 30 days prior to project. Routine, biannual monitoring program could fulfill this requirement. Post-construction Monitoring: Collection of wading depth surveys (i.e., to a depth of -10 feet MLLW) at established locations immediately after completion if placement volume is greater than 50,000 cy.	City via consultant	Data included in Post-construction Monitoring report to be submitted to resource agencies within 60 days following construction.
Surfing Conditions	Pre-construction Baseline Monitoring: ½ month prior, 3 times per week over 14 days. To include qualitative observations and weekly short interviews with local surfers (see Appendix C). Construction Monitoring: Daily qualitative observations and weekly short interviews with local surfers. Post-construction Monitoring: ½ month to 2 months post-construction monitoring 3 times per week, depending on scale of project and persistent impacts. To include qualitative observations and weekly short interviews with local surfers.	City or consultant	Data included in Post-construction Monitoring report to be submitted to resource agencies within 60 days following construction.

Monitoring Activity	Northern/South Receiver Sites	Responsible / Implementing Party	Reporting
Turbidity	Pre-construction Baseline Monitoring: Water clarity testing shall be conducted at the receiving beaches to establish ambient conditions. Testing shall consist of measuring transmission of light through the water using a transmissometer or other turbidity measuring device. Testing should occur 3 or more times within one year during different oceanographic conditions to quantify a range of values. Construction Monitoring: Daily during construction from a high vantage point on land. If visual monitoring (qualitative monitoring) indicates significant turbidity greater than ambient one-half mile from the discharge site (either offshore or downcoast) for two consecutive days, then the monitor shall: i. Evaluate littoral conditions (wind, tide, wave climate, and littoral drift) to determine if the plume distribution is likely of a short-term nature; ii. Evaluate the effectiveness of discharge site BMPs and opportunities to modify shore placement methods to further reduce sediment discharge during periods of strong long shore movement; iii. Record and implement the necessary modifications to the BMPs; iv. Notify the San Diego Water Board and USACE by telephone or email; and; v. Comply with any measures identified by the RWQCB, in consultation with other responsible agencies, as appropriate, to mitigate project-related turbidity, including modifying or halting discharge. If significant turbidity persists on the third day, the	City or consultant	If turbidity exceedance, frequent coordination with the Regional Water Quality Control Board. If no exceedance, monitoring data will be included in the Post-construction Monitoring Report.

Monitoring Activity	Northern/South Receiver Sites	Responsible / Implementing Party	Reporting
	monitor shall commence daily water clarity testing and reporting to the RWQCB and the USACE (i.e., quantitative monitoring). Testing shall consist of measuring transmission of light through the water using a transmissometer or other turbidity measuring device. Daily testing shall continue until no project-related turbidity is detectable (i.e., until offshore and downcoast reading return to ambient). Testing shall be designed to document the aerial extent and concentration of the turbidity plume at the time of day it is most developed, and shall include at least: samples taken as close as practicable to the discharge site, one-half mile upcoast of the discharge site, one-half mile downcoast of the discharge site (minimum four samples). Sampling shall be done throughout the water column. These sampling protocols may be modified with the San Diego Water Board's written approval. The applicant shall document logistical arrangements for such potential water quality sampling and shall include draft quality assurance/quality control protocols in the projects monitoring plan. If significant turbidity is greater than ambient one-half mile from the discharge site (either offshore or downcoast) for five (5) consecutive days, the discharge shall be halted or modified to reduce turbidity. <u>Post-construction Monitoring:</u> Qualitative or quantitative monitoring shall persist until conditions return to ambient.		
Sediment Gradation	<u>Pre-construction Baseline Monitoring</u>: Establish sediment gradation baseline (i.e. composite grain size envelope) from two shore-perpendicular transects for each receiving beach. Suitable beach sand must reasonably match the	City or consultant	Coordination with resource agencies if significant

Monitoring Activity	Northern/South Receiver Sites	Responsible / Implementing Party	Reporting
	color of natural beach sand after exposure to the marine environment, must be less than 10% manufactured sand, must be a minimum of 80% sand or greater and within 10% of the grain size envelope of the beach profile; and must not form a hardpan after placement. Construction Monitoring: Confirmation testing may be conducted daily at the receiving beach to verify the sediment quality being deposited. This monitoring requirement may not be required for high-quality sand sources of a consistent geologic nature. Post-project Monitoring: Sediment gradation baseline should be evaluated every three years to determine if the prior baseline represents existing conditions. If conditions have substantially changed, a new grain size envelope should be developed for the receiving beach.		(greater than 50%) sediment gradation deviation during construction. Data included in Post-construction Monitoring report to be submitted to resource agencies within 60 days following construction.
Traffic	During construction: • Implement a traffic control plan; • A flag man shall keep pedestrians a safe distance from the truck, notify beach users of the presence of the truck, and ensure that a clear and safe path is maintained. This system would be codified in the traffic control plan required to be prepared for each project site; • Public streets used as the haul route shall be cleaned via street sweeper as necessary; and trucks shall only use haul routes approved by the city and shall be specified in the traffic control plan required to be prepared for each receiver site.	Contractor	City to confirm implementation by Contractor

Monitoring Activity	Northern/South Receiver Sites	Responsible / Implementing Party	Reporting
Trash and Debris	Construction Monitoring: Full-time monitoring of the source site to verify trash and debris is not loaded into trucks delivering sand to the beach (for upland source projects). Daily monitoring of the beach for presence of trash and debris is also required to maintain high quality sand deliveries.	Consultant or contractor	City to confirm implementation by Contractor

6.1. Pre-Construction Monitoring

Describe all pre-construction monitoring that will be conducted. The description will include what will be monitored, procedures for the monitoring, frequency, who will conduct the monitoring and their qualifications. Figures representing areas, transects, etc., will be included in the pre-construction monitoring.

If pre-construction monitoring identifies potential adverse impacts to coastal resources from the proposed project not identified and addressed in the Mitigated Negative Declaration or within the Resource Agency permits, the specific replenishment project for which the pre-construction monitoring was being conducted shall be suspended. The monitoring results will be presented to the above mentioned agencies for their review and files.

6.2. Construction Monitoring

Describe what monitoring will be conducted during construction. This will include monitoring protocol and contingency operations for monitoring of turbidity, sediment gradation, trash and debris, traffic, and surfing effects at the proposed discharge site and adjacent nearshore and offshore areas. Monitoring personnel will be identified and their qualifications will be provided.

6.3. Post-Construction Monitoring

Describe what monitoring will be conducted after construction. This will include monitoring protocol and contingency operations for monitoring of beach profiles (for placement volume greater than 50,000 cy), surfing, turbidity, and sediment gradation at the proposed discharge site. Monitoring personnel will be identified and their qualifications will be provided.

Biological Mitigation: Any inadvertent impacts to sensitive habitat areas by the proposed development shall be reported to the Executive Director of the California Coastal Commission (CCC) within 2 weeks of occurrence and shall be mitigated. Such mitigation shall require an amendment to the CCC Coastal Development Permit or a new permit unless the CCC Executive Director determines that no amendment or new permit is legally required. Other approvals may also be required from the other permitting agencies (USACE, RWQCB, SLC, CDFW, and California State Parks and Recreation) and any inadvertent impacts will be reported to these agencies concurrently.

7. Cumulative Projects in the City of Oceanside

This section will provide an assessment of potential impacts of the proposed project in combination with past, present and reasonably foreseeable beach nourishment projects in the City of Oceanside. Past projects in the City are as follows:

- Regional Beach Sand Project I – Placement of approximately 2.1 million cy of sand on 12 beaches in 2001. 421,000 cy placed in the City Oceanside.
- Regional Beach Sand Project II – Placement of approximately 1.5 million cy of sand on 8 beaches in 2012. 292,000 cy placed in the City Oceanside.

Reasonably foreseeable beach nourishment projects in the project area are shown in Table 1.

Table 1. Reasonably Foreseeable Projects in the Study Area

Project Name	Project Lead	Construction (year)	Volume (CY)	Placement Location

8. Submittals

This section will outline what submittals are required and when the resource agencies can expect them. This will include notification of any violations to the resource agencies.

8.1. Post Discharge Report

Post-Discharge Report will be compiled and submitted to the resource agencies which will include all of the information collected by the City for an individual project, including all preparation testing, volume of material placed at the site, transportation and construction details, finalized project schedule, and monitoring results. An assessment of the project effects, both beneficial and adverse will be presented at the end of every year, if a project is constructed. This analysis will serve as the basis for any modifications that can be made to optimize the program.

Remedies or modifications must be submitted to the CCC Executive Director and the CCC Executive Director will determine whether the proposed remediation may be authorized under the City's CDP or whether the work shall require an amendment to the permit or a new permit. The remedies or modifications will also be presented to the other permitting agencies (USACE, RWQCB, SLC, CDFW, and California State Parks and Recreation) for their review and approval.

9. Special Requirements

9.1. Timing of Submittal and Approval from the Resource Agencies

This section will include description of any special permit conditions for the program with regards to timing of submittals and approvals.

9.1.1. California Coastal Commission (CCC)

9.1.2. Regional Water Quality Control Board (RWQCB)

9.1.3. California State Lands Commission (SLC)

9.1.4. U.S. Army Corps of Engineers (USACE)

9.2. Other Permits

Copies of permits from the Coastal Commission, State Lands Commission, Regional Water Quality Control Board, and U.S. Army Corps of Engineers will be attached to this notification report.

The City of Oceanside will notify the CCC Executive Director and the other permitting agencies of any changes to the development required by such permits. Such changes shall not be incorporated into any beach replenishment project until the applicant obtains a CCC amendment to this CDP (and other permitting agencies approvals/amendments); unless the CCC Executive Director, and other permitting agencies, determines that no amendment is required.

Public Safety

Due to the heavy equipment required on the beach during the Opportunistic Use Projects it will be necessary and required to have safety personnel such as lifeguards, flagmen and spotters on the beach during construction. A beach encroachment permit and a public safety plan will be required by the City before any equipment is allowed on the beach.

9.3. Copies of Approvals

Copies of approvals, including the Letter of Permission from the U.S. Army Corps of Engineers will be provided to all agencies once they are received. The project will not commence until approvals from all permitting agencies has been obtained.

9.4. Assumption of Risk, Waiver of Liability and Indemnity

The City of Oceanside acknowledges and agrees (i) that the site may be subject to hazards such as erosion and landslides; (ii) to assume the risks to the City and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Coastal Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

Appendix C
Surfing Survey

City of Oceanside Opportunistic Beach Fill Program
Surfing Survey

Survey Location: _____

Survey Time: _____

Name (Optional): _____

Contact (Optional): _____

Email (Optional): _____

CONDITIONS AT TIME OF SURVEY
Number of Surfers -All Surfers _____ -Standup Paddler _____ -Body Surfer/Body Board _____
Number of waves ridden (Approx.) _____
Average Ride Length (seconds) _____
Wave Breaker Type (Not Breaking, Backing off, Peaky, Peeling, Sectioning, Walled, Close Out) _____
Wave Face Steepness (Mushy, Hollow, Steep, Dumping) _____

1) Sex: (M/F)

2) Age:
   a) <14
   b) 15-24
   c) 25-34
   d) 35-44
   e) >45

3) Primary Surfboard type:
   a) Longboard
   b) Shortboard
   c) Stand-up paddle-board
   d) Other (kneeboard, bodyboard)

4) Years of surfing:
   a) <5
   b) 5-10
   c) 10-15
   d) 15 – 20
   e) >20

5) Years of surfing this spot or in the vicinity if this spot (within 2 miles)?
   a) < 5
   b) 5-10
   c) 10-15
   d) 15-20
   e) > 20

6) How often do you surf here?
   a) < 100 days / year
   b) 100-150 days / year
   c) 150-250 days / year
   d) >250 days / year

7) What time do you typically surf here?
   a) Before 10 am
   b) 10 am to 12 pm
   c) 1 pm to 5 pm
   d) After 5 pm
   e) Whenever it's best

8) What tide to you typically surf here?
   a) low (< 1.5 ft)
   b) Mid (1.5 - 3 ft)
   c) High (> 3 ft)
   d) Whenever it's best

9) Why do you like to surf here?
   a) Wave Quality
   b) Consistency
   c) Convenience
   d) People / environment

10) What conditions do you think makes the best surfing days at this spot?

_____
_____
_____

11) In your opinion, has the spot changed over the course of time that you have been surfing here? If so, please describe how.

_____
_____
_____

12) Other comments.

_____
_____
_____

PROJECT LOCATION/RECEIVER BEACHES

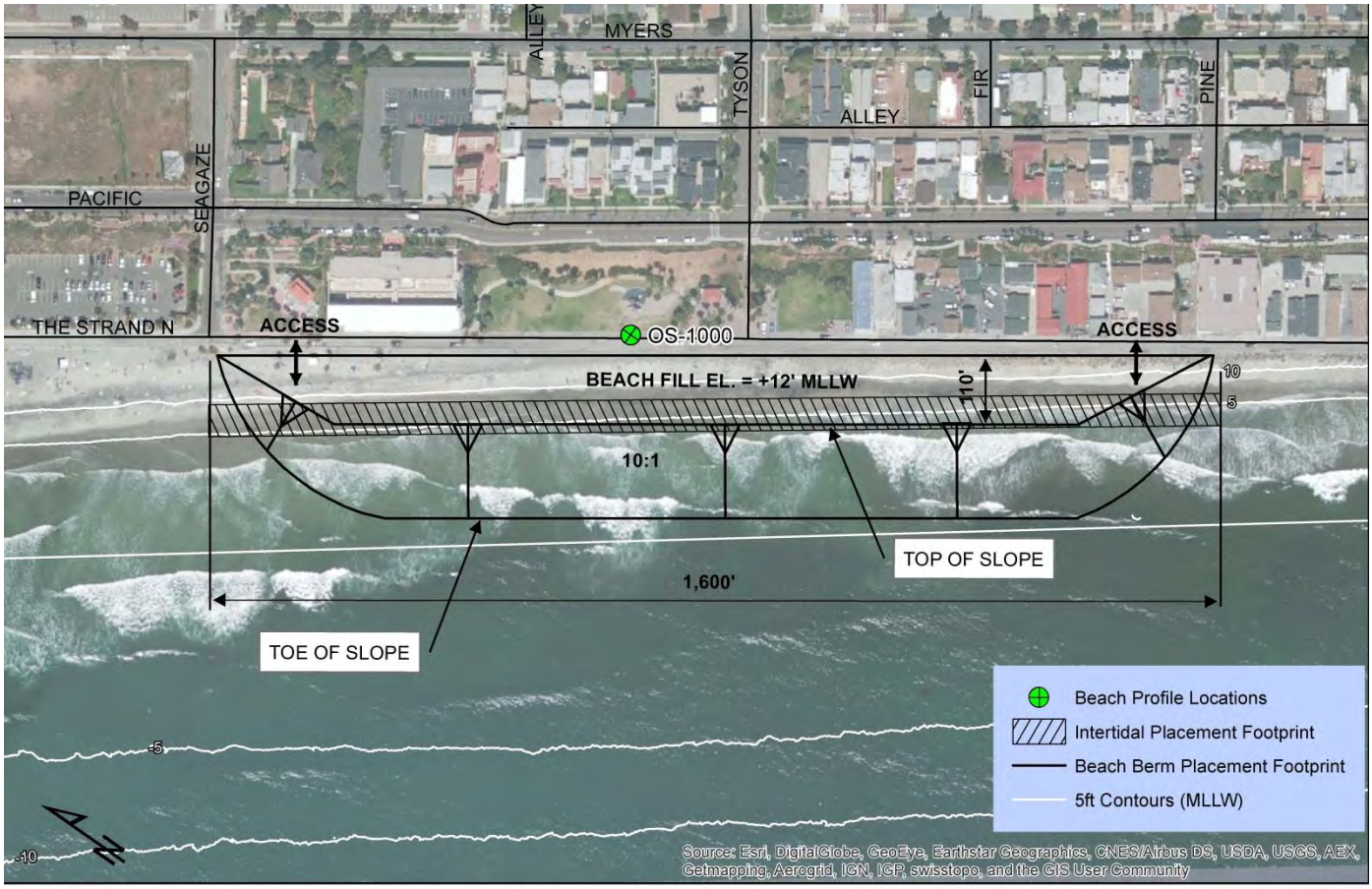
EXHIBIT NO. 1

APPLICATION NO.
6-15-0986

Project Location

California Coastal Commission

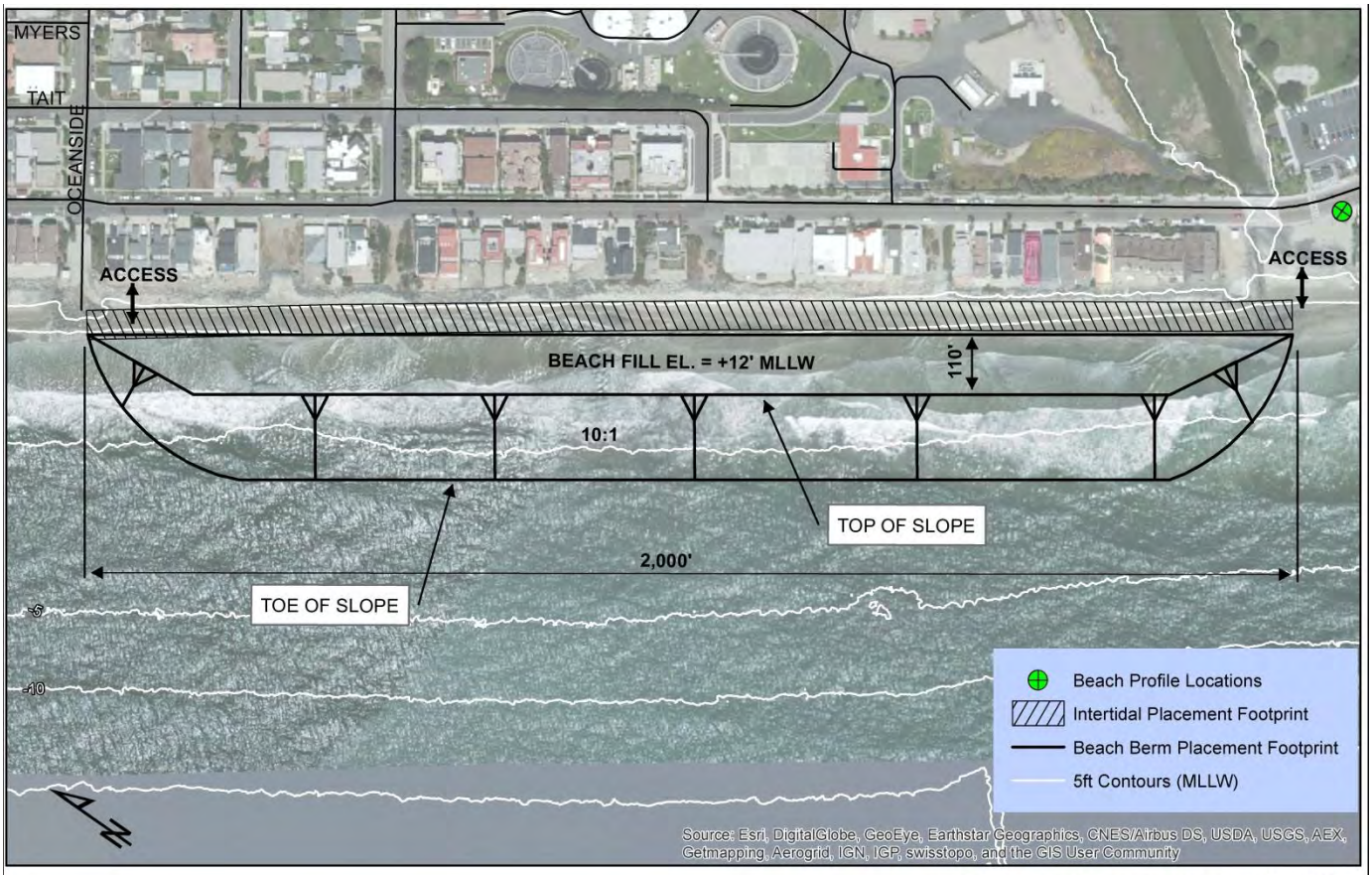
NORTHERN RECEIVER SITE & ACCESS POINT



Northern Placement Site - Plan View

EXHIBIT NO. 2
APPLICATION NO. **6-15-0986**
Northern Receiver Site
California Coastal Commission

SOUTHERN RECEIVER SITE & ACCESS POINT



Southern Placement Site - Plan View

EXHIBIT NO. 3
APPLICATION NO. **6-15-0986**
Southern Receiver Site
California Coastal Commission

PLACEMENT METHODS DIAGRAM

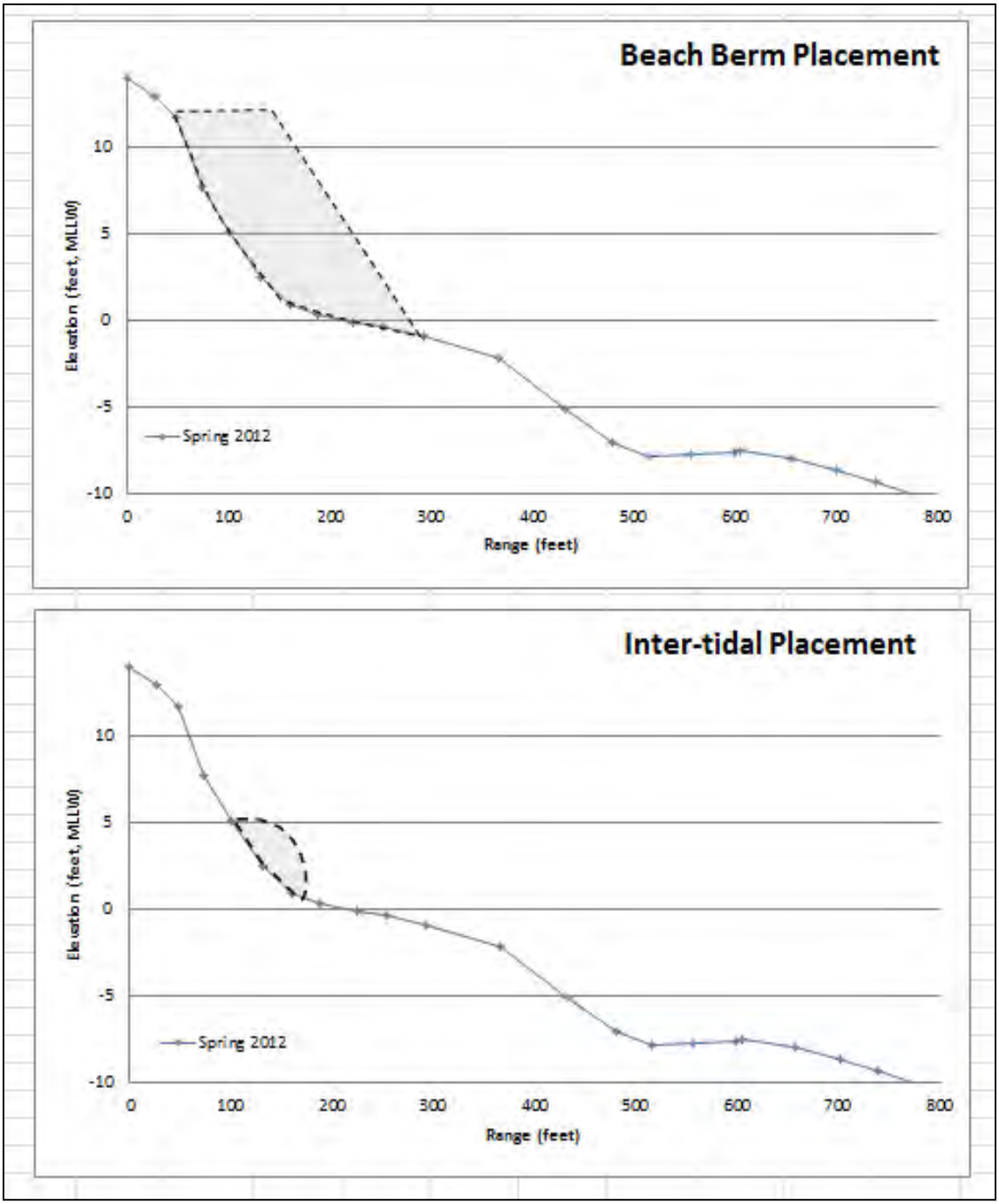


EXHIBIT NO. 4

APPLICATION NO.
6-15-0986

Placement Methods

California Coastal Commission

NEARSHORE BIOLOGICAL RESOURCES

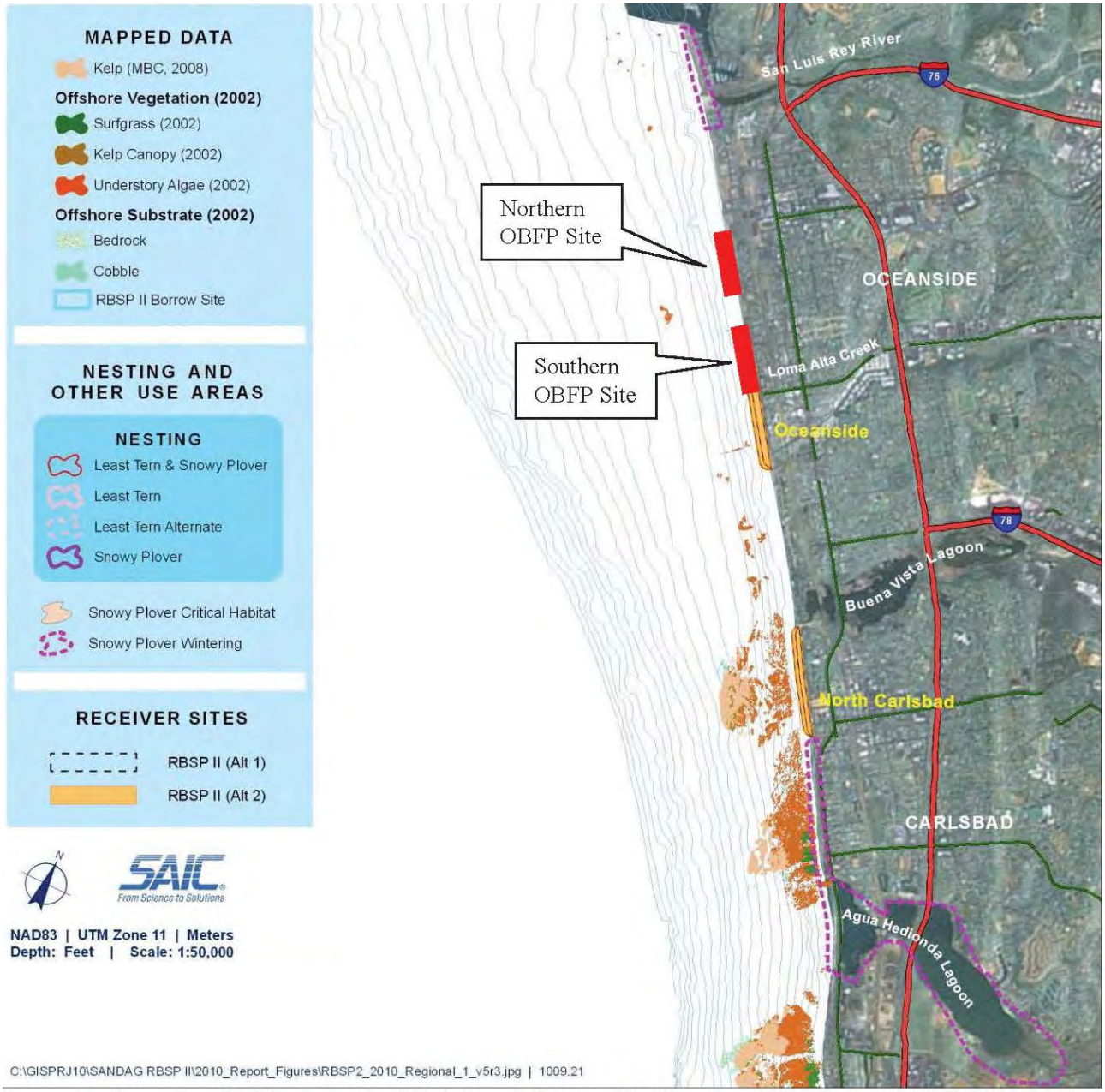


Figure 7. Sensitive Habitats in the Vicinity of Oceanside Receiver Site (from SANDAG 2011).

EXHIBIT NO. 5

APPLICATION NO.
6-15-0986

Nearshore Resources

California Coastal Commission

STANDARD & SPECIAL CONDITIONS CDP #6-07-027

COASTAL DEVELOPMENT PERMIT
Date: October 14, 2015
Permit Application No.: 6-07-027

STANDARD CONDITIONS:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

SPECIAL CONDITIONS:

The permit is subject to the following conditions:

1. Final Project Notification Report. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit for review and written approval by the Executive Director, a final Project Notification Report in substantial conformance with the preliminary Report submitted on 2/16/07 (attached as Exhibit #5).

The applicant shall comply with the procedures and submittal requirements outlined in the approved Project Notification Report. Any proposed changes to the approved Project Notification Report shall be reported to the Executive Director. No change to the Project Notification Report shall occur without a Commission-approved amendment to the permit unless the Executive Director determines that no such amendment is legally required.

2. Approval of Excavation/Dredging Site: The subject permit is only for sand replenishment projects. All other development proposals that may be involved in obtaining the sand source, including but not limited to non-exempt grading, new construction or dredging, if located within the Coastal Zone, shall require the approval of the Coastal Commission or its successor agency through a coastal development permit or an amendment to this permit, unless such development is exempt from permit requirements under the Coastal Act and its implementing regulations.

3. Scope and Term of Permit Approval: The development authorized by this coastal development permit is limited to beach nourishment that is consistent with the proposed project limits identified in the applicant's submittal including but not limited to the placement sites, maximum annual quantities of beach nourishment, seasonal limitations, and methods of delivery. The authorization for continuing development pursuant to this permit shall expire 5 years from the date of Commission approval.

EXHIBIT NO. 6
APPLICATION NO.
6-15-0986
Conditions
CDP #6-07-027
California Coastal Commission