CALIFORNIA COASTAL COMMISSION
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W6d

LCP Grant Program

(City of Oceanside LCP Grant Application)

April 7, 2025

CORRESPONDENCE

From: Charles Bowen <cbowen@sosoceanside.com>
Sent: Friday, April 4, 2025 1:34 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Comment on April 2025 Agenda Item Wednesday 6d - LCP Grants Program

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To: California Coastal Commissioners
Re: LCP Grants Program - City of Oceanside

I urge you to approve the LCP Local Assistance grant of $1,835,000 to the City of Oceanside.

Authorizing this grant will allow the Commission to fund the development of a Baseline Monitoring Program, an Update to the City of Oceanside's Vulnerability Assessment, an addendum to the City's Coastal Hazards Adaptation Plan and an LCP amendment, along with associated public outreach and engagement. These tasks are vital to the continued progress of the RE:BEACH pilot project, the pre and post implementation monitoring of the project, and the future scaling of the project to the rest of the beach. Moreover, this grant will help the City to show progress towards fulfilling the requirements of SB-272, which is important to the ability of the City to obtain future funding for beach and habitat restoration, climate resiliency and sea level rise mitigation projects.

Save Oceanside Sand fully supports and advocates for the implementation and scaling of the RE:BEACH pilot project. This one of a kind project in California, and the nation. is innovative and provides a field test of a creative, science-backed retention solution that is not only needed in Oceanside, but the region (and perhaps beyond) as well.

In closing, I appreciate the Commission's willingness to consider the grant, and I urge you to authorize it.

Regards,

Charlie Bowen
Communications Director
Save Oceanside Sand
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949.257.9932

April 4, 2025

Delivered via email

To: Karl Schwing
District Director, San Diego Coast
California Coastal Commission

Re: W6d, LCP Grants Program (Oceanside)

Honorable Commissioners,

Surfrider Foundation is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect our world's ocean, waves, and beaches. Surfrider's San Diego County Chapter (Surfrider) represents thousands of ocean recreation users — from dedicated surfers to occasional beachgoers — as well as the coastal communities and economies that rely on them throughout the region. Thank you for the opportunity to comment on this proposed $1.8m LCP Grant to the City of Oceanside.

Our San Diego County Chapter has long advocated for Oceanside to complete a comprehensive LCP Update. Specifically, Surfrider strongly supports updates to Oceanside's outdated, 1980s-era coastal development LCP land use policies which allows unsustainable coastal development to continue without any recourse or mitigation for negative impacts to coastal resources and public access.

New beachfront development continues to be approved and built that is fully reliant on existing riprap revetments from the 1970's and 80's, despite established Coastal Act policy that new development *should not* rely on seawalls[1]. There is currently no dry sand beach along the

[1] "30253. New development shall do all of the following:
… (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs."

See also 2024 California Coastal Commission Sea Level Rise Policy Guidance
Ch. 7 at page 188
"The Coastal Act requires that new development be sited and designed to be safe from hazards and to not adversely impact coastal resources (Coastal Act Sections 30235 and 30253). The main goals that relate to hazards and coastal development are:

southern 2.4 miles of Oceanside's 3.7 mile coastline, and any casual observer can clearly see that the private revetments spanning nearly all 2.4 miles of the southern coastline sit below the mean high water mark (i.e. on public tidelands within the Commission's original jurisdiction). To date, the public has received little to no recourse, compensation, or mitigation for this ongoing violation of its right to access public tidelands in Oceanside.



Young surfers negotiate privately-owned riprap that blocks public access in South Oceanside. Photo taken at negative low tide (usually there is no beach to access, note the absence of dry sand and moss on the riprap).

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o Update land use designations, zoning maps, and ordinances to account for changing hazard zones
o Include sea level rise in hazard analyses and policies
o Plan and locate new development to be safe from hazards, not require protection over its entire lifespan, and be protective of coastal resources
o Incorporate sea level rise adaptation into redevelopment policies
o Encourage the removal of development that is threatened by sea level rise
o Use "soft" or "natural" solutions as a preferred alternative for protection of existing endangered structures
o Limit bluff and shoreline protective devices to protect existing endangered structures
o Require special considerations for critical infrastructure and facilities
o Protect transportation infrastructure"



The adjacent properties to the South enjoy perched, private beaches made possible by their revetment atop public tidelands. Photo taken at negative low tide.

At the same time, the City of Oceanside is undergoing CEQA review for renovations to beachfront structures below the pier, including a lifeguard tower, community center, and an open-air amphitheater as part of its Beachfront Improvements Phase II project. Even under the lowest sea level rise scenarios (1.6 ft by 2100[2]), these structures are unlikely to survive a 75 year project life without being subject to inundation from an encroaching ocean. New restrooms were completed in 2022 at Breakwater Way as part of Phase I of this project; those restrooms *already* experience flooding during King Tides. Oceanside's 2019 Draft Adaptation Plan spells it out clearly:

By 2040, daily flooding during high tide is expected to be a common occurrence, even without storms, for beachfront properties starting just south of Paradise by the Sea (hotel near Breakwater Way) and extending south past Roberts Cottages. The rest of the coastline will be impacted during larger storms, with waves expected to extend inland of the Strand, potentially impacting properties along the entire coastline.[3] (Note: this is the same general area as the planned Beachfront Improvements)

[2] OPC Sea Level Rise Guidance, 2024 Update: by 2100, statewide sea levels are expected to rise between 1.6 ft and 3.1 ft (Intermediate-Low to Intermediate Scenarios), and even higher amounts cannot be ruled out.
[3] Draft Oceanside Adaptation Plan, Section 5-2 Coastal Flooding and Beach Erosion Adaptation



February 2024 - Beach scarping comes perilously close to a parking lot, The Strand, and the Junior Seau Community Center (part of the Beachfront Improvements Project). This beach relies on annual Harbor dredging to remain viable in the near-term. Photo taken at deep low tide, facing North from the Pier.



February 2024 - beach playground temporarily closed, threatened from wave scarping. This is directly seaward of the beach amphitheater and parking lot included in the Beachfront Renovation Project. The lifeguard station under the pier - also included in the project - can be seen at top left.

Meanwhile, Commission staff is recommending a $1.8 million LCP grant to Oceanside so that it can do baseline monitoring, numerical modeling, and additional studies as part of an unfunded, unpermitted sand replenishment and retention pilot project (RE:BEACH). The proposed studies will also inform updates to the City's 2018-19 Draft Coastal Hazards Assessment and Adaptation Plan, but mainly in regards to the RE:BEACH proposal. We do not oppose the studies that Oceanside aims to fund with this grant money, but ask for stronger conditions to necessitate recommendations for coastal development land use updates and long-term adaptation planning as well. In essence, it is unethical for Oceanside to embark on a sand replenishment and retention project while simultaneously continuing a historic coastal development pattern that directly contributes to the beach erosion crisis that said project aims to address.

RE:BEACH is a reactive coastal adaptation strategy. If it is not coupled with proactive adaptation strategies, its success will be short-lived. If implemented without land use updates, RE:BEACH will encourage Oceanside to "hold the line" and continue its historic pattern of development too close to the ocean. This does not solve the impending problem of sea level rise; instead, it shifts the burden of this impending emergency to the next generation. Similar to how beachfront development should not continue if it is reliant on armoring, it should also not continue in areas where it will be fully reliant on sand replenishment to protect it. This is doubly true in the case of sand replenishment that is not yet funded or permitted.

Surfrider calls for a more balanced approach. We implore the Coastal Commission to ensure, by all means at its disposal within the parameters of your LCP Grant Program, that proactive adaptation strategies are explored and implemented in conjunction with Oceanside's pursuit of RE:BEACH. Putting additional conditions on this $1.8 million LCP Grant - the largest to date - would serve as the logical starting point. One of the LCP Grant Programs five priorities, quoted below, could serve as justification for such requirements.

Completion of land use plan and/or zoning work to achieve certification of a new Local Coastal Program (or an Area of Deferred Certification) or planning and/or zoning work to significantly update certified LCPs (or LCP segments) in whole or in part to provide for coastal resiliency, or to reflect changed conditions, new information and scientific knowledge, new programs and policies, or other significant changed circumstances[4].

Surfrider does not support sand retention structures due to their negative impacts on downdrift beaches. Despite our position, we have worked as constructively as possible with Oceanside on the RE:BEACH project thus far. We sympathize with the dire beach conditions in Oceanside,

[4] Updated LCP Grant Program Guidelines

and understand that sand replenishment will likely be needed to “buy time” in the short-term. However, the Coastal Commission should not approve a pilot sand retention project without requiring that Oceanside take additional, long-term adaptation measures and update its coastal land use policies, including but not limited to:

- Updated regulatory policies that ensure adequate setbacks, such that new development will not require shoreline protection within the useful economic life of the structure when subjected to natural erosion and accounting for sea level rise. Oceanside’s current LCP does not allow new development to rely on the construction of seawalls, but has been thus far interpreted to allow new development to rely on existing seawalls - *this loophole must be closed.*
- Removal/relocation of riprap on public tidelands that prohibits both vertical and lateral access.
- Sufficient mitigation for development that negatively impacts sand supply and public beach access and recreation, similar to the established paradigm in nearby Solana Beach. This mitigation is consistent with the Recreation and Access policies of Chapter 3 and Section 30253.
- Exploration of beachfront improvement projects on city-owned land that account for the best available sea level rise, and prioritize coastal-dependent uses over those that could be placed elsewhere, i.e. community gymnasiums and open-air amphitheaters.

Sand replenishment, with or without retention structures, will have limited durability in the face of rising seas and the potential for unanticipated funding deficits. However, sand replenishment coupled with proactive, long-term sea level rise adaptation strategies will dramatically increase the durability of Oceanside’s most treasured asset - the beach. Please use this generous LCP Grant as an opportunity to condition the City to reevaluate its coastal development land use policies and add teeth to its Adaptation Plan, in addition to funding the RE:BEACH studies already included in the application.

Sincerely,

Mitch Silverstein
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April 7, 2025

Dear Commissioners:

On behalf of the Oceanside tourism industry and the Visit Oceanside board of directors, I respectfully express our support for staff's recommendation to award the City of Oceanside the LCP grant. This grant provides an important opportunity to fund the development and implementation of a baseline monitoring program, update the city's vulnerability assessment and incorporate baseline sea level rise policies that are critical to our long-term adaptation planning efforts.

As the destination marketing and management organization for the City of Oceanside, it is our goal to balance the needs of the residents with the needs of the industry to drive economic development through tourism. Our beaches, recreation, surf culture and heritage are inherent qualities of the Oceanside experience and our quality of life. In May 2024, Visit Oceanside launched its first **Sustainable Tourism Master Plan (STMP**). The plan was informed by resident surveys and town halls as well as industry surveys and workshops. There was a destination assessment and sustainability diagnostic performed by The Travel Foundation, using the sustainability criteria recognized by the **Global Sustainable Tourism Council**. A **vital recommended action** within our STMP **was** to continue the **high prioritization of funding for shoreline preservation and continue to advocate for strategies such as REBEACH and a long-term Coastal Management Plan.**

Please consider the following impacts that beach erosion and sea-level rise have on our community.

1. This erosion has caused negative sentiment and safety issues for our beach goers, resulting in **loss of tourism revenues**. According to an economic impact study, Oceanside beaches are the number one activity our visitors experience during their stay, and they are the top demand generator for our city.

2. In 2023, visitor spending was $589 million, directly generating over $43 million in local and state taxes. This visitor spending has a tremendous impact on our economy as well as quality of life for our residents. These **tax dollars support vital services and infrastructure** for Oceanside. Infrastructure is a critical issue in providing a soft buffer for the strand and amphitheatre. In addition, this visitor spend supports nearly **4,000 local jobs**.

3. This has not only caused **economic inequity**, but it has caused **inequity for our residents.** Oceanside is known for its diverse and multicultural population. This inequity has especially affected our under-served youth while other beach communities are able to thrive and enjoy their beach resources for recreation, various sporting activities and youth camps. It's unfair that other regional projects have not benefited Oceanside.

4. Other **existence benefits include biodiversity, protecting eco-systems, cultural, heritage and bequest value**. These are important to our community and inherent to Oceanside's culture. It's been determined by experts that the **overall losses across the board are overwhelming,** making it impossible to put a value on it.

We appreciate your consideration of this important opportunity. We are at a serious juncture on this issue.

Sincerely,

Leslee Gaul
President/CEO
Visit Oceanside