



June 19, 2023

Delivered via email

To: Mayor and City Council

Re: Comments on Item #15, Approving the Preferred Design Option for the South Carlsbad Boulevard Climate Adaptation Study

Honorable Mayor and City Council,

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 for all people. Our San Diego County Chapter 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.

We appreciate the opportunity to provide comments on *Item #15 - Approving the Preferred Design Option for the South Carlsbad Boulevard Climate Adaptation Study*. We also appreciate City Staff for including our chapter as a community stakeholder in this important climate adaptation project, which has our strong support. We agree with City staff, the Traffic & Mobility Commission, and the Beach Preservation Committee's recommendation of roadway option #2 for its purported greenhouse gas reductions and mobility improvements.

However, Surfrider's main interest in this project is the long-term preservation of the beach in the realignment area. Regardless of which road realignment option you support, the most important decision from a beach preservation perspective is what happens to the existing southbound Carlsbad Blvd roadway once traffic is realigned landward. Surfrider seeks your support for the long-term best outcome for this project, which requires demolishing the old southbound roadway once the new one road is constructed in order to restore the beach.

Our position is bolstered by the [Las Encinas Creek Restoration Alternatives Analysis](#), which was completed by GHD as part of the grant-funded deliverables for this project. The analysis confirms that should the existing roadway remain after traffic realignment is completed, the beach will be lost with 1.7 feet of sea level rise. However, by removing the roadway and implementing nature-based beach preservation measures in its place, we can create a resilient beach that withstands an extreme sea level rise scenario of 6.6 feet. Such a beach will provide

tremendous public value in an area dominated by bluff-backed beaches that face an existential threat from rising seas in the next 50-75 years.



The [GHD analysis](#) illustrates the formation of a sea level rise-resilient beach at Las Encinas Creek (p.48)

The current best available science states that one foot of sea level rise is certain by 2050, with potential for dramatic acceleration through 2100¹. This puts a hard expiration date on the beach at Las Encinas Creek if the existing roadway remains. Additionally, the rock shoreline protection (RSP) will remain as long as the roadway does - and will likely need augmentation - to protect the road from additional flooding and damage. RSP steals public beach space, is unsightly, and any plans to leave or augment it would result in permitting challenges and/or required mitigation from the Coastal Commission The [Coastal Development Permit](#) (CDP) for most of the RSP

¹ [State of A Sea Level Rise Guidance, 2018 Update, Ocean Protection Council](#)



expires in March 2024, at which time a conditioned *Long-Term Hazards Management Plan* will be due with any new CDP application.² Lastly, maintaining the existing roadway from an encroaching ocean will be costly and self-defeating. The question of whether to move the road is *when*, not *if*.

Surfrider believes that our intentions, those of the Coastal Commission, and those of the City should naturally align on the same goal: to move threatened coastal infrastructure out of harm's way *while saving the beach*. We understand that this project is still in its early stages, that costs must be estimated, and that funding must be secured. However, we implore the City Council to think BIG and keep the larger vision at the forefront of tonight's decision and those that follow. **We have an opportunity to move a threatened roadway out of harm's way before it's too late, while at the same time creating a climate-resilient public beach in place of one that is rapidly eroding.** It's a win-win for all parties, especially our children who deserve the same access to beaches that we enjoy today.

Tonight's decision neither asks for, nor requires, any further action from City Council. With the larger vision in mind, we therefore ask you to make a motion similar to the one approved by the Beach Preservation Committee on June 6: "to have this item return to council to discuss the retreat of the coastline now versus the retreat of the coastline later at an appropriate time."³ Since the state grant that funded the project thus far ends on Feb 28, 2024, and the CDP for the rock shoreline protection ends on March 14, 2024, we would ask that "the appropriate time" to discuss these next steps should be no later than April 2024.

We also ask that City Council direct staff to prepare a cost estimate for the entire project, not just the new roadway construction. Demolition of the existing S Carlsbad Blvd. and the subsequent beach restoration project must also be estimated. Once costs are estimated, please direct staff to seek funding for the entire project from the various state and federal funds

² "If the permittee proposes to retain any portion of the shoreline protection beyond the five year authorization period..., the permittee is required to include... an evaluation of alternatives to the shoreline protection and related elements that are capable of protecting the development while eliminating or reducing impacts to public access, public views, shoreline processes including sand supply, marine resources, and other coastal resources at the site...The permittee must also include mitigation for the effects of any remaining portion of the shoreline protection on public access and recreation and other coastal resources during the expected life of the remaining shoreline protection..." Special Condition 1C (abridged), [Coastal Commission Application 6-16-0450](#)

³ Page 7 of [Staff Report: Approving the preferred design option for the South Carlsbad Boulevard Climate Adaptation Study](#). 6.20.23



dedicated to implementing infrastructure and climate adaptation improvements. Whether or not full funding is available to tackle everything at once, committing to the *Retreat Now* vision and ensuring staff take a holistic approach to the project will ensure its success. What we need today is commitment, so that we can begin tomorrow with momentum.

Thank you for the opportunity to comment on this item. Surfrider supports this project as a shining example of proactive coastal adaptation, and looks to your leadership to keep it moving forward.

Sincerely,

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