

City of Oceanside – Comments on AB691 Synthesis Report

August 23, 2022

GENERAL COMMENTS

- The report speaks briefly to the “non-market” value of natural shoreline resources (pp. 22-23) and notes that the vulnerability assessments prepared by the trustee agencies collectively estimate that sea level rise and related climate-induced hazards – if not mitigated – could result a total loss of non-market value of \$1.3B by 2100. Further on in the report (p.33), it is stated that statewide loss of value from natural resources could total \$5B, while statewide loss of recreational amenities could top \$3B. These losses will be felt across the state in the form of diminishing commercial activity, diminishing employment, and lower sales and property tax revenue. It’s essential that the state consider these costs in the development and implementation of coastal adaptation policies.
- The report acknowledges the state’s preference for “nature-based” coastal adaptation strategies (pp. 24-25) and the City agrees with this preference. However, we encourage the Commission to maintain a broad definition, in scope and context, of “nature-based” solutions, accepting that nature-based approaches may not be attainable in the first phase of adaptation implementation. It must be acknowledged that not all stretches of coastline are amenable to such strategies, due to limited natural resources and beach width, the presence of public utilities and amenities (e.g., drainage and water quality control facilities, water and sewer facilities, harbors, piers, parks, restrooms), private development constructed prior to the Coastal Act, etc. This is the case in Oceanside, where severe erosion has affected the shoreline for over 6 decades; creating a “nature-based” solution in an area with limited natural resources to work with is an insurmountable task upfront. While this limitation is noted in the report, it is generally not accounted for in the development review process or in state grant funding opportunities. Consequently, jurisdictions that cannot effectively accommodate “nature-based” coastal adaptation strategies upfront often cannot gain regulatory approval or grant funding for essential projects, including improvements that address public safety hazards, impediments to coastal access, and the loss of public recreation areas and amenities. “Nature based” approaches should continue to be encouraged, but understood as representing a wide breadth of possible options and timelines. If the Commission has interest in taking a more proactive approach with defining “nature based” solutions, the Commission should encourage the implementation of pilot projects that can help us learn and better define when, where and how nature-based strategies can be deployed to be successful.
- The City would like to better understand the basis for the deed of trust granted to Oceanside in the 1960s and 1970s and what it actually means to be a trustee of state tidelands. It is our limited understanding that trustees are permitted to place sand in trust-held areas, and dredge sand from within the tidelands (after acquiring all other permits too, of course). We are particularly interested in what, if any, additional local discretion these actions have afforded the City. We welcome a conversation with SLC representatives on this matter.

COMMENTS ON SLC RECOMMENDATIONS

- **6.1.6 Assess the interconnected, interrelated vulnerabilities of local communities and critical infrastructures that granted lands and the public trust uses depend on.** Oceanside's coastline and trustee lands have been severely impacted by the presence of the Camp Pendleton Boat Basin, which has been impeding sand transport to City's beaches for nearly 80 years. The associated loss of sand has and continues to significantly constrain public trust uses along the City's shoreline, while rendering both public and private development highly vulnerable to sea level rise and related climate-induced hazards. Where critical federal and/or state infrastructure is resulting in beach loss and associated impacts, federal and state agencies should coordinate solutions with impacted local jurisdictions in a timely and equitable manner.
- **6.4.1 Work together to align sea level rise planning and policies across the state.** Alignment of state SLR policy with state and local coastal planning efforts is contingent upon explicit acknowledgement by the state that the variability of conditions along the state's 800 miles of coastline does not lend itself to uniform policy prescriptions. While this reality appears to be acknowledged in Recommendation 6.4.5, it is essential that this reality be reflected in the development review process and grant funding programs.
- **6.4.3 Provide funding to Trustees for vulnerability assessments, ongoing monitoring, asset repairs, adaptation planning, and implementation of adaptation projects.** Eligibility for state grant funding for coastal adaption projects should not be limited to "nature-based" strategies and/or nature-based strategies should be more broadly defined to capture a larger range of projects. All projects that restore natural systems (such as sediment delivery & transport along our coastlines) that ultimately maintain beaches for public trust uses should also be eligible for state grant funding, even if these projects involve "hard" structures that are compliant and allowed under the Coastal Act.
- **6.4.4 Create a "no net loss" policy for beaches.** The City of Oceanside supports no net loss of beaches as a goal to aspire towards, however has concerns about the ramifications of implementing and potentially enforcing such a policy on its tenants. What mechanisms or assistance will the Commission be providing tenants for maintaining or enhancing beaches? Currently, state and many Federal agencies are not prioritizing funding for beach nourishment programs alone; it has been noted that the benefits of beach nourishment alone can be uncertain and potentially short-lived. On the flip side, proposals to utilize sand retention measures, which would help stabilize beach sand, are rife with controversy amongst regional entities and NGOs. Many jurisdictions, like the City of Oceanside, struggle to maintain consistent beach widths in the present condition. Without a significant change to the funding and political landscape to coastal zone management practices in CA, a no net loss of beaches policy would be unachievable. The City would prefer this policy be shifted towards a commitment to helping tenants with the challenging issue of maintaining beach sand with a chronic sediment supply deficit and rising seas.
- **6.4.8 Create phased adaptation approaches for short-, mid-, and long-term strategies.** The City of Oceanside agrees that a phased approach to coastal adaptation is appropriate, given uncertainty over the long-term extent of sea level rise and associated impacts. In light of this uncertainty, state policy direction should focus on short and mid-term adaptation strategies and acknowledge that short and mid-term strategies can provide time for local jurisdictions to address potential long-term impacts in a deliberate manner that is sensitive to fiscal impacts, market conditions, evolving best available science, etc. Additionally, allowing a phased approach could potentially allow for nature-based solutions to become an option, as nature resources become restored with the implementation of short-term coastal management strategies.

- **6.4.9 Consider managed retreat options for all vulnerable structures.** This policy should be qualified to limit consideration of managed retreat to economically feasible options. If the state is going to promulgate managed retreat at the local level, the state should accept the costs associated with eminent domain, property management, etc. Oceanside is supportive of creative solutions to funding retreat of private properties from coastal areas, such as SB 1078 (Allen) which establishes a Sea Level Rise Revolving Loan Program.
- **6.4.11 Prioritize nature-based adaptation strategies over hard shoreline armoring where appropriate.** The City appreciates that this policy recommendation is qualified to acknowledge that nature-based adaptation strategies are not appropriate in all contexts and in some areas may have limited success / benefits to public trust lands. The City recommends further qualifying this recommendation to say “where appropriate and feasible.”
- **6.4.13 Ensure sediment management practices evaluate beneficial reuse options based on cost-benefit analyses that include ecosystem service valuation, recreational value, and damage reduction benefits.**

The City of Oceanside recommends that the Commission encourage innovative *and* traditional sand retention strategies, pending the design requirements of the vulnerable area in question. Limiting this policy only to artificial reefs and low-profile groins may not allow for flexibility and future innovations.