



July 3, 2026

Delivered via email

To: Kate Huckelbridge, Executive Director, California Coastal Commission;
South Coast District Office, California Coastal Commission

Re: Objection to Immaterial Processing – CDP Amendment No. 6-16-0450-A2

Dear Executive Director Huckelbridge and San Diego Coast District Staff,

We submit this letter to object to the processing of CDP Amendment No. 6-16-0450-A2 as an immaterial amendment. The proposed amendment would extend the authorization period for the Carlsbad Boulevard rock revetment north of Encinas Creek by seven additional years, from an initial six years (to March 14, 2024) to thirteen years (to March 14, 2031). It more than doubles the authorization period the Commission actually evaluated and conditioned when it approved the underlying permit in 2018.

Under 14 CCR § 13166(b)(3), an objection that raises an issue of Coastal Act conformity requires that the amendment be referred to the Commission for review as a material amendment. Keeping an unmitigated rock revetment on a public beach for seven more years implicates Coastal Act § 30235, which allows shoreline protective devices only under limited conditions, when required, and only when designed to eliminate or mitigate their impacts to shoreline sand supply. That mitigation has never been required here, which is precisely what Special Condition 1(c) was written to address. The extension also implicates § 30253 and the public access and recreation policies of §§ 30210 through 30221. The Executive Director's finding that "no adverse impacts are anticipated" is not consistent with these ongoing impacts, including the public beach area the revetment occupies and its ongoing impacts to shoreline sand supply. We therefore ask the Commission to decline to process this amendment as immaterial and to review it as material.

Background

Carlsbad Boulevard, formerly Highway 101, runs the length of the City along the coast. During the 2015-2016 El Niño, wave and cobble inundation at this location (known locally as "the dip in the road") prompted an emergency permit (G-6-15-0049) on December 29, 2015, authorizing a 270-foot rock revetment. In 2018, the Commission approved CDP 6-16-0450, granting follow-up approval to retain that revetment and after-the-fact approval of an additional 250-foot segment installed in 2016, for five years, specifically to give the City time to develop a Long-Term Hazards

Management Plan. In 2023, the Commission processed a one-year extension (A1) as immaterial. The City now seeks a seven-year extension (A2), also as immaterial.

The mitigation requirement has never been triggered, and this amendment would extend that outcome by seven more years

Special Condition 1(b) required the City to apply for a regular CDP implementing a Long-Term Hazards Management Plan no later than the end of the authorization period. Special Condition 1(c) required that if the City sought to retain the revetment beyond that initial period, the permit application must include an alternatives analysis and mitigation for the effects of the remaining shoreline protection on public access, recreation, and other coastal resources for its expected remaining life.

Neither has happened. Instead of submitting the complete long-term plan the application 1(b) requires, the City has twice sought — and now seeks a third time — to extend the "initial" authorization period itself. Each extension pushes the 1(b) deadline forward without ever requiring the alternatives analysis or mitigation that 1(c) requires for continued retention of the armoring. A seven-year extension does the same thing at a scale that changes the character of the permit: total authorization would run thirteen years, more than double the five-year term the Commission evaluated and conditioned in 2018. The scope and effect raise the question of whether this qualifies as 'immaterial.'

The City's own record shows initial progress, then an abrupt halt

- The City's 2017 SLR Vulnerability Assessment identified this stretch as vulnerable to erosion and flooding and recommended relocating the road inland.
- A 2020 California Coastal Conservancy Climate Ready grant funded a study of the corridor that presented the City two options — Retreat Now or Phased Retreat. The results were packaged as a partial Long-Term Hazards Management Plan, completed in February 2024.
- The City Council approved a preferred design alternative for future realignment of southbound Carlsbad Blvd. along the one-mile "dip in the road" stretch in June 2023.
- The City's 2023-2027 Five-Year Strategic Plan lists the South Carlsbad Boulevard Realignment as a "Priority Project," targeting completed design and permitting by 2027.
- The City's most recent Capital Improvement Budget, passed June 16, 2026 — eight days before this notice was issued — allocated \$0 to completing design and permitting for the project, and estimates a \$0 allocation through 2031.

The City has the vulnerability assessment, the partial Hazards Management Plan, and two viable long-term management pathways. What it hasn't done is dedicate funding to make progress

toward finishing the job, and a seven-year extension removes the deadline pressure that would otherwise hasten that decision.

Surfrider commends City staff for repeated attempts to secure grant funding to continue this project, including a recently submitted \$2m Ocean Protection Council Sea Level Rise Adaptation Implementation Grant. Our understanding is that so far, none of the previous grant applications have been successful. A lack of grant funding, however, is insufficient to justify a potential seven-year delay in devising, permitting, and implementing a 30%-designed adaptation project that moves a critical road out of harm's way while durably preserving an entire stretch of popular, public beach.

The City has the money. Carlsbad is financially healthy, with an estimated budget reserve of \$144.6m. This amounts to a 58% reserve that comfortably exceeds the City's own preferred minimum of 40%. And the City funds coastal work on Carlsbad Boulevard when it chooses to. It previously appropriated upwards of \$12m to Carlsbad Blvd. street and sidewalk improvements less than a mile north of the revetment in question, and returned an estimated \$4.5m of that funding to the CIP fund after the City Council voted down several of those improvements (CIP 6054, Terramar Area Coastal Improvements). It appropriated over \$13m to beach access improvements further north on Carlsbad Blvd., much of the work dedicated to sidewalk widening that is welcome but cannot be considered critical (CIP 3896, Beach Access Repair and Upgrades – Pine Avenue to Tamarack).

For reasons unknown to Surfrider, the City has deprioritized moving forward expeditiously on this project despite the strong, enforceable conditions it agreed to in Special Conditions 1(b) and 1(c). This is a matter of priorities as much as unsuccessful grant funding. The requested delay is unnecessary and will have adverse impacts on coastal resources.

The adverse impacts of delay are not hypothetical

This stretch of road already overtops during king tides and large swells at high tide. Forecasts for an El Niño winter in 2026-27 raise the realistic prospect of further bluff failure, additional emergency armoring, or road closures before this extension period even runs its course. Another seven years without action virtually ensures a repeat of the pattern that produced the original 2015-2016 emergency permits, now with more of the coastline already committed to rock shoreline protection. But a future failure here would not be the kind of unexpected event that emergency authorization exists to address. The City has documented this precise vulnerability since at least its 2017 Sea Level Rise Vulnerability Assessment, and the original 2015-2016 emergency armoring that preceded it put both the City and the Commission on notice earlier still. Further storm-driven damage is foreseeable, not unforeseen. Granting seven

more years of delay would set up the City to seek additional emergency armoring for a hazard it has long anticipated, and is now choosing not to address. Wave action has already begun cutting behind the northern border of the revetment, in the same proximity to where partial bluff failures have repeatedly occurred over the past few years. Without expeditious progress towards the Long-Term Hazards Management Plan the City committed to and is now attempting to extend for more than double the time of the original permit, adverse impacts to coastal resources and public access along this stretch of coast are guaranteed.

Request

We ask the Executive Director to decline to process this amendment as immaterial. For the reasons above, the amendment raises issues of conformity with the Coastal Act, and under § 13166(b)(3) it should be referred to the Commission for review as a material amendment.

Alternatively, issuance of an immaterial amendment for a shorter extension period, i.e. 2-years, would be an acceptable alternative course to give the City enough time to satisfy Special Conditions 1(b) and/or 1(c).

Thank you for your consideration.

Sincerely,

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