CITY OF SAN CLEMENTE
OFFICE OF THE CITY MANAGER

Date: January 6, 2025
To: Dan Phu, OCTA
From: Leslea Meyerhoff, AICP, Coastal Administrator
Re: Feedback on OCTA CRRS Draft Alternative Concepts
CC: City Manager, Mayor and City Council

Introduction

The City of San Clemente appreciates the opportunity to provide preliminary feedback on the Draft Alternative Concepts for the Coastal Rail Resiliency Study (CRRS) presented on 12/19/24. The OCTA rail line traverses the entire 5-mile length of shoreline in the City and as such the City is the primary stakeholder with a direct and vested interest in the coastal rail resiliency planning process and outcomes. The City will also be a Responsible Agency under CEQA. Our comments are provided below for your review and consideration.

Local Coastal Resiliency Planning Context

For coastal policy and resiliency planning context, the City of San Clemente (City) is a leader. In 2018, the City prepared a comprehensive, *Certified Local Coastal Program (LCP) Land Use Plan* update. In 2019, the City prepared a *Sea Level Rise Vulnerability Assessment* (SLRVA). In 2021, the City prepared a *Coastal Resiliency Plan* to establish an action plan for the preferred, long term shoreline management strategy for San Clemente. In 2022, the City established a regional shoreline monitoring program that collects data for that benefits all South Orange Counties agencies with coastal assets.

The direction provided by the City leadership, and the overwhelming consensus of the community, is that comprehensive and consistent beach sand replenishment, combined with strategic supplemental sand retention features is the preferred strategy for short and long-term shoreline management. This strategy emerged as the preferred approach to (1) addressing the immediate needs caused by coastal erosion due to sand supplies being cut off and (2) building long term coastal resilience in San Clemente. Comprehensive beach sand replenishment was intentionally and thoughtfully selected as it is the only approach that provides shoreline protection for existing structures and critical public infrastructure, and co-benefits sandy beach recreational space and habitat enhancements.

The City's coastal setting and its sandy beach is the economic foundation of the local economy in San Clemente. In 2024, the City completed the first cycle of a 50-year beach sand replenishment project developed in partnership with the federal and State governments. The partnerships successfully forged with the US Army Corps of Engineers and California State Parks represent an important collaboration that will help to restore the sand supply in San Clemente bringing 2 million cubic yards of sand to the City over the next 50 years. In 2024, the City also conducted its third opportunistic beach sand replenishment project at North Beach.

The City also signed an MOU with SANDAG in December 2023 to participate in the third Regional Beach Sand Project which will bring another 1 million cubic yards of sand to the City in the coming years. The City's request to SANDAG to participate also opened the door to regional partners including Dana Point and the County of Orange.

The City is also conducting a sand retention study to develop alternative methods of slowing down the sand loss in the City and we are conducting an offshore borrow site investigation to develop additional offshore sand sources that can be used to sustain long term beach sand replenishment. Both of these efforts are grant funded and both will be completed in 2025 and we will make these available to you when complete.

The City brings these recently completed and planned costal resilience building projects to your attention to emphasize that we have begun implementing our preferred comprehensive and consistent beach sand replenishment strategy and that we welcome OCTA as a partner in this effort.

By OCTA's own accounts, when the railroad was first established, and for the last 100 years the railroad was well buffered by the presence of a sandy beach that protected the railway.

Since the sand supplies from San Juan Creek have effectively been cut off from reaching the beach, the San Clemente region has reached critical mass in its lack of sand supply. This lack of sand is having a material effect on the OCTA rail line as well as all other existing structures along the coast. Focusing on restoring the sand supply remains the City's primary focus as it works to rebuild its beaches for current and future generations of residents and visitors.

To this end we recommend that you include (1) remaining a good regional partner agency and (2) maintaining a walkable sandy beach as two of the project goals and objectives which are listed in the presentation as Project Purpose and Need.

Recommendations for Draft Bluffside Concepts

The City anticipates completing a bluff characterization study that will provide important information on the geologic makeup of the coastal bluffs in the City. We will make this study available to you when it is complete later in 2025.

The City desires to have proactive, uniform, consistent and natural appearing bluff retention devices that replicate the look of the native bluffs installed in the City rather than a haphazard and inconsistent structures. The City also urges OCTA to ensure that no bluffside solutions preclude the existing Coastal Trail and that if it is jeopardized it be relocated to the westside of the OCTA ROW along the beach as it is an important, highly valued and highly utilized community asset.

In response to recent failures, the City recently explored the concept of a geologic hazard abatement district (GHAD) as a means of developing a uniform and consistent approach to stabilizing coastal bluffs by formalizing a plan of control. Such a plan of control could implement one or more of the bluffside solutions identified by OCTA. Note also that the City has begun prohibiting permanent irrigation on coastal bluff top properties for projects requiring a discretionary action. While this will not have an immediate effect of reducing perched groundwater within the bluffs it will assist over time in slope stability.

The City desires to continue evaluating this option in collaboration with OCTA since the toe of the bluff slope and in some cases the slopes themselves are located within OCTA ROW. Additionally, when bluff failures do occur, they have a material and detrimental effect on OCTA rail line and railroad operations in general since the OCTA ROW is downslope from the coastal bluffs in San Clemente. Therefore, we request that you add a GHAD to your list of alternatives that could be implemented Citywide, or in select areas more prone to bluff instability, and cost shared with all property owners that benefit from GHAD formation.

Recommendations for Draft Beachside Concepts

The resiliency goals of the City include beach sand replenishment that is both comprehensive and sustained. Any shore-parallel or shore-perpendicular structures such as mini-headlands or seawalls should be optimized to have a minimal footprint.

Options 1 & 2: The City recommends that Options 1 & 2 (rip rap and revetment concepts) be combined as revetment (engineered or non-engineered) to streamline the list of alternatives since both options involve the placement of armor stone.

Option 3: This option is preferable as a hard structure relative to revetment as it would occupy significantly less physical beach space. For example, a seawall would likely have

a 2-foot-wide footprint on the beach compared to 50-foot wide or greater footprint for a revetment (engineered or un-engineered).

Option 4: Additional information and clarification is needed on Option 4 (hybrid solution) in order for the City to understand what this option entails and to weigh in. For example, would this option include a living shoreline concept similar to what has been constructed in Encinitas to protect Pacific Coast Highway? Would this option include a mini-headlands to create pocket beaches along the coast similar to what exists in Newport Beach?

Option 5: This would be a City preferred alternative and may also be the environmentally superior alternative and least environmentally damaging alternative.

Option 6: This would be a City preferred alternative and may also be the environmentally superior alternative and least environmentally damaging alternative.

Option 7: The concept of a cobble beach was recently vetted in the City as part of the City's sand retention project study. There is little to no support for this option and we recommend that you take this option off the table.

Option 8: This would be a longer-term study and may be undertaken by others but it is not likely a viable option for the 10–30-year CRRS. This could be a viable option for a longer-term study by OCTA.

Option 9: We recognize that as part of CEQA and NEPA you are required to have a no-action / no-project alternative. However, as the primary landowner of a continuous, linear, transportation corridor at the back of the beach that is part of the LOSSAN network and is a designated DOD strategic defense asset, a no action alternative is wholly unrealistic.

Draft Rail Concepts

It is unclear how these concepts relate to the Beachside and Bluffside Concepts. Are they mutually exclusive and proposed in lieu of the Beachside and Bluffside Concepts or are they intended to be implemented in combination with these concepts? The relationship of these concepts should be explained more fully in forthcoming public documents.

Conclusion

The City appreciates the continued conversation with OCTA regarding options for supporting and building short-term and long-term coastal resiliency in San Clemente. We encourage you to continue to focus on alternatives that do not preclude the City's ability to implement its vision for restoring the public beach to ensure a walkable dry sandy beach for current and future generations.