



# AGENDA REPORT

SAN CLEMENTE CITY COUNCIL MEETING

Meeting Date: December 7, 2021

Agenda Item 7B

Approvals:

City Manager ES of

Dept. Head CCD

Attorney \_\_\_\_\_

Finance JK

**Department:** Community Development  
**Prepared By:** Cecilia Gallardo-Daly, Community Development Director

**Subject:** **COASTAL RESILIENCY PLAN**

**Fiscal Impact:** Yes. The work on the Coastal Resiliency Plan (Plan) is a component of the Local Coastal Program (LCP) which is partially funded through a grant from the California Coastal Commission. The remaining funding for this effort is appropriated in the Fiscal Year 21-22 Budget.

**Summary:** Staff recommends that the City Council approve adoption of the City's Coastal Resiliency Plan (Attachment 1) and authorize staff to submit the Plan to the California Coastal Commission (CCC) as a final 2021 LCP Planning Grant deliverable. Staff also recommends that the City Council authorize, by resolution, the submittal of a grant application to the CCC to support Coastal Resiliency Plan implementation actions.

**Background:** All Cities and Counties in the California "Coastal Zone" are required to have an LCP. The "Coastal Zone" varies by jurisdiction but generally consists of the land area inland up to 1,000 yards of the Pacific Ocean. The City's Coastal Zone generally extends inland to Interstate 5. The LCP only applies to lands within the Coastal Zone, which represent approximately 15% of the total land area of the City.

An LCP consists of (1) a Land Use Plan (LUP) and (2) a Local Implementation Plan (IP) which together contain land use policies, zoning requirements and development standards to implement the California Coastal Act of 1976 (Public Resources Code, Division 20) within the City's Coastal Zone.

The City's main objectives with respect to the preparation of an LCP are to retain local control throughout the LCP Update process in order to implement the vision and long terms goals for San Clemente, which reflect local preferences and unique conditions in the City. The primary goal of obtaining a certified LCP is to give the City more control over projects within the City's Coastal Zone and to provide greater certainty to local property owners and businesses. The result of this LCP update effort will be a streamlined Coastal Development Permit (CDP) process for property owners by enabling them to obtain a single City permit.

A comprehensive update of the City's LUP was certified by the CCC in August 2018. The following documents are relevant components of the City's LCP:

- Certified LCP LUP. The City's original LUP was first certified in 1988 and comprehensively updated in 1996. In August 2018, the CCC certified the City's comprehensive LCP LUP update. The LUP is the first piece of the LCP and contains the land use related policies for the City's Coastal Zone.
- Sea Level Rise Vulnerability Assessment (SLRVA). The City completed a SLRVA in 2019 to identify facilities and critical public infrastructure along the coast that may be at risk in the future with rising sea levels. The SLRVA was submitted to the California Coastal Commission (CCC) in December 2019 as a final LCP Planning Grant deliverable.
- Coastal Resiliency Plan. The City has prepared a Coastal Resiliency Plan that builds upon the findings and recommendations in the SLRVA. The Coastal Resiliency Plan outlines a range of options and adaptation strategies for improving resiliency in the City. The Draft Coastal Resiliency Plan was available for a six-week public review and comment period beginning October 7, 2021 through November 18, 2021. Comments on the Plan received by the City are included as Attachment 2 to this Report.

**Discussion:**

The City of San Clemente Coastal Resiliency Plan serves as the City's near-term and long-range planning and guidance document to address future potential sea-level rise (SLR) and its effects on storm surge, shoreline erosion, and coastal flooding in the City. The purpose of the City of San Clemente Coastal Resiliency Plan is to outline a phased adaptation approach to SLR that builds on the findings and recommendations contained in the City's 2019 Final SLRVA to implement actions, strategies, plans, and programs to improve long-term coastal resiliency in San Clemente. This Plan was funded in part by the CCC grant LCP-18-05 awarded to the City to support preparation of the LCP.

Vulnerability to SLR is a product of several variables including: exposure to coastal hazards such as shoreline erosion, flooding, and inundation; sensitivity to coastal hazards including potential for damage or loss of function; and, adaptive capacity, which is the ability to restore function or avoid damage.

San Clemente is affected by several coastal hazards, summarized in the Plan and SLRVA. Due to a general lack of sediment supply in the littoral cell, beach / shoreline erosion is an existing challenge faced by the City, and the region, and is anticipated to accelerate with SLR. In San Clemente, shoreline erosion is expected to continue to be the primary hazard affecting coastal resources, existing structures and critical public infrastructure. For San Clemente, the dry beach area and potentially the intertidal zone (i.e., area between the high tide and the low tide) seaward of the existing railroad revetment are at risk of permanent loss with rising seas.

Enhancements and additions to ongoing, proactive coastal hazard reduction measures are anticipated to be necessary to address potential increases in hazard levels due to SLR. Resiliency measures within this Plan focus on direct protection from current hazards and future SLR hazards through both nature-based solutions

and potentially soft and hard structural means. Due to the existing trends of shoreline erosion affecting San Clemente and many other jurisdictions throughout the region, any amount of SLR is anticipated to exacerbate existing (baseline) hazard conditions due to the long-term reduction in littoral sediment delivered to the coastline south of Dana Point from the San Juan Creek. In the absence of active, comprehensive, and long-term beach sand replenishment efforts, this net reduction of sediment delivery to the coastline results in an eroding shoreline.

As sea levels rise over longer time horizons, there are notable thresholds with progressively greater impacts that will drive the need for one or more resiliency or adaptation measures to be implemented as part of a phased adaptation to SLR.

The following are key SLR thresholds (i.e., trigger points) identified in the City's SLRVA for each SLR scenario evaluated and the resources most at risk from coastal hazards in the absence of any intervention or action by the City or others:

- 0.8 feet SLR (25 cm): Existing sandy beaches erode and lose about half their width, some areas (North Beach and Mariposa Point) erode completely to the railroad impacting coastal access, recreation, and the environmental resources seaward of the railroad. Structures on the beach, including the City's Municipal Pier and Marine Safety Building, are vulnerable to more frequent storm-related flooding, damage, erosion, scour, and undermining.
- 3.3 feet SLR (100 cm): Most sandy beaches are eroded up to the railroad, small beaches may exist seasonally and at low tide. Shoreline erosion projections indicate this may be close to a threshold point for the railroad corridor as the railroad would be subject to repeated wave attack and flooding during high tides and storm events.
- 4.9 feet SLR (150 cm): In the SLRVA, this scenario assumed a worst-case analysis where the railroad and revetment was relocated / removed from its current location. Under this assumption, shoreline erosion could reach the coastal bluffs landward of the railroad. Bluff top land and existing structures would be vulnerable to bluff failures resulting from increased wave action at the toe in the absence of the protective railroad revetment and assuming no other resiliency building actions are taken by the City or others.

The CCC recognizes the State of California Sea-Level Rise Guidance, (OPC 2018), released in March 2018 by the Ocean Protection Council (OPC), as the "best available science" on SLR along the coast of California. The OPC 2018 Guidance uses a probabilistic approach to generate a range of SLR projections at a given time horizon.

The City's phased approach to resiliency building will be based on physical monitoring of the beach, shoreline and nearest tide gauges. The physical monitoring efforts will focus on identifying signals in the data that indicate the shoreline is approaching the SLR thresholds predicted in the SLRVA. Once these signals (e.g., thresholds) appear to be manifesting / occurring, additional resiliency actions would be warranted. This Plan sometimes referred to as an "Adaptation" Plan identifies various municipal actions, regional actions, coordination activities, and various SLR adaptation strategies that can be pursued

by the City to supplement the existing coastal resiliency plans, programs, and projects currently implemented or planned to be implemented in the City.

Most cities will likely consider a range of options in their adaptation strategy toolbox, and San Clemente is no exception to this. Retaining a wide range of options on the table helps to ensure that the City retains maximum flexibility in determining how best to carry out its long-term vision for its community. Considering a range of options is also prudent as the understanding of climate science continues to improve in terms of both its predictive capabilities and its ability to identify the most probable local scenarios. Monitoring of SLR is an important component of adaptation planning, and future updates to the LCP will reflect updated climate science, predictions, scenario probabilities, and possibly a wider range of adaptation strategies to consider.

This Plan represents the beginning of the City's phased adaptation efforts to begin to build coastal resiliency and adapt to SLR by reducing risks in the City and exposure of assets to coastal hazards. Reviewing current City programs and policies associated with SLR risk reduction, such as those around shoreline protection, is the first step to identify immediate adjustments to alleviate or eliminate risks. Where adjustments to current practices will not sufficiently address the risks, then more substantial actions must be identified and should be implemented within a future LCP Amendment. This effort will be ongoing in the coming years as understanding of the variables involved in climate science continues to improve. This Plan is intended to establish a process in which new data and information will be assessed, as needed, to inform adaptation decisions and actions. As such, it is anticipated that the Plan will need to be periodically re-evaluated and updated over time.

### Public Input

The Plan before the City Council has been revised to reflect public input provided by stakeholders during the six-week public review period that ran from October 7 through November 18, 2021. Comments on the Plan were received from the City's Beaches, Parks and Recreation Commission, the City's Planning Commission, the Surfrider Foundation, staff from the California Coastal Commission, the Law offices of Gaines & Stacey and San Clemente Pier Pride. All comments received by the City are included in Attachment 2 to this Staff Report for reference.

City Staff and the consultant team reviewed all comments received. Revisions have been made to the Plan to reflect the input received. This includes adding a list of recommendations to the Executive Summary of the Plan, adding additional figures and graphics from the SLRVA, adding clarifications to some of the technical information cited in the Plan, and non-substantive grammatical edits and corrections. In addition, cross-referencing and hyperlinks to some of the additional technical documents used to prepare the Coastal Resiliency Plan were added for ease of access in reviewing the related and publicly available documents.

Of note, one of the recommendations previously included in the Plan was the installation of a tide gauge at the San Clemente Pier. Based on follow up research,

it was determined that the existing tide gauge operated by the National Oceanic and Atmospheric Administration (NOAA) since 1925 at the Scripps Pier in La Jolla contains published corrections for use in San Clemente. Therefore, the cost of installing, operating and maintaining a new tide gauge at the San Clemente Pier is not likely a good use of funds as the data that could be generated is already available at no cost to the City; therefore, this recommendation is no longer included in the Plan.

### Priority Planning

The key recommendations contained in the Plan are listed in the Executive Summary and in Chapter 10. The recommendations for action items and near term priorities include the following which should be pursued as actionable items building off the momentum of this effort.

- Continue to track water levels measured at the existing NOAA tide gage in La Jolla that has been operating since 1925 (with published corrections for San Clemente) for signals of rapidly accelerating sea level rise (the published data for this site currently indicates a long-term linear rate of sea level rise of 0.26 mm/year).
- Re-establish an ongoing, annual shoreline monitoring program consisting of spring and fall shoreline profile transect monitoring to document the condition of the City's beaches and to establish baseline conditions now, against which future sea level rise effects can be quantified.
- Prepare a feasibility study to identify critical erosion hot spots in the City and develop one or more pilot projects that provide multiple benefits (e.g., sand retention and ecosystem benefits) such as a living shoreline, coastal dune system or cobble berm structure.
- Establish a regional shoreline management working group to collaborate, cost share and implement regional coastal resiliency solutions. Convene a stakeholders meeting in early 2022.
- Explore opportunities to establish a geologic hazard abatement district (GHAD) in the City.
- Establish a Capital Improvement Program (CIP) fund dedicated to funding coastal resiliency programs and projects and develop dedicated funding source(s).
- Consider re-establishing the City's Opportunistic Beach Sand Placement Program.

### **Next Steps**

The City has an opportunity to apply for a California Coastal Commission grant to obtain funding to support Coastal Resiliency Plan implementation efforts. Included in the staff recommendation is a request to submit a grant application to the CCC in December 2021 to obtain grant funding support for Coastal Resiliency Plan implementation actions, programs and projects. The grant funding would be used to implement some of the priorities listed above, including a shoreline monitoring program to track beach width and changes to the beach profile. This will be particularly important once the Army Corps Sand Replenishment Project is in place.

The grant would also be used to fund a feasibility study to determine what will work in San Clemente to retain sand along the coastline based on the City's own unique conditions.

**Recommended**

**Action:** Staff Recommends that the City Council:

1. Hold a Public Hearing.
2. Adopt Resolution NO. \_\_\_\_\_ titled: "A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE, CALIFORNIA, TO ADOPT THE COASTAL RESILIENCY PLAN AND AUTHORIZE THE SUBMITTAL OF THE COASTAL RESILIENCY PLAN TO THE CALIFORNIA COASTAL COMMISSION TO RECEIVE AND FILE AS A FINAL LOCAL COASTAL PROGRAM PLANNING GRANT DELIVERABLE."
3. Adopt Resolution NO. \_\_\_\_\_ titled: " A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE, CALIFORNIA, AUTHORIZING SUBMITTAL OF AN APPLICATION TO THE CALIFORNIA COASTAL COMMISSION FOR A LOCAL COASTAL PROGRAM GRANT TO SUPPORT COASTAL RESILIENCY PLAN IMPLEMENTATION."

**Attachments:**

1. San Clemente Coastal Resiliency Plan
2. Comments received by the City on the Draft Coastal Resiliency Plan
3. City Council Resolution to Adopt the Coastal Resiliency Plan and Authorize Submittal to the California Coastal Commission
4. City Council Resolution Authorizing Application to the California Coastal Commission for a Local Coastal Program Grant

**Notification:** A Notice of Public Hearing was published on November 25, 2021.



# CITY OF SAN CLEMENTE COASTAL RESILIENCY PLAN

December 2021

# Table of Contents

<b>EXECUTIVE SUMMARY.....</b>	<b>3</b>
Overview of Sea Level Rise (SLR) Hazards in San Clemente.....	3
Scenarios Evaluated in the San Clemente SLRVA.....	4
Future SLR Timing and Uncertainties in the Model Projections.....	4
Coastal Resiliency Building & Adaptation Planning: A Phased Approach.....	5
Key Recommendations in the San Clemente Coastal Resiliency Plan.....	7
<b>CHAPTER 1: COASTAL RESILIENCY AND ADAPTATION PLANNING OVERVIEW.....</b>	<b>8</b>
<b>CHAPTER 2: STATE OF CALIFORNIA GUIDANCE.....</b>	<b>10</b>
Safeguarding California Plan: Reducing Climate Risk.....	11
Ocean Protection Council 2018 Sea-Level Rise Guidance.....	12
<b>CHAPTER 3: APPROACHES TO BUILDING COASTAL RESILIENCY.....</b>	<b>13</b>
Understanding Coastal Processes.....	13
Resiliency Project Planning and Project Lead Times.....	15
Managing Development in Hazard Areas – LUP Policies.....	16
Community Outreach and Involvement.....	16
<b>CHAPTER 4: OVERVIEW OF VULNERABILITIES IN SAN CLEMENTE.....</b>	<b>17</b>
San Clemente Sea Level Rise Exposure – North Reach.....	18
Sea Level Rise Exposure – Central Reach.....	19
Sea Level Rise Exposure – South Reach.....	20
Range of Resource Categories Potentially Vulnerable to Sea Level Rise.....	20
<b>CHAPTER 5: SEA LEVEL RISE MONITORING AND RESILIENCY PROJECT PHASING.....</b>	<b>27</b>
<b>CHAPTER 6: RESILIENCY BUILDING AND PLANNING PRINCIPLES.....</b>	<b>29</b>
Planning Principles.....	29
<b>CHAPTER 7: PRIORITY MEASURES FOR RESOURCES AND ASSETS.....</b>	<b>31</b>
Existing and Ongoing Coastal Resiliency Programs.....	31
San Clemente Winter Storm Berm Program.....	32
USACE Coastal Storm Damage Reduction Project.....	33
Additional + Proposed Strategies for Consideration in the City.....	36
Hybrid Living Shoreline / Beach Sand Dune Complex.....	36
Sediment Management Program.....	38
Sand Retention Structures / Nature Based Solutions.....	41
Cross-Shore (Shore Perpendicular) Sand Retention Structures.....	42
Offshore Multi-Purpose Reefs.....	42
Storm Drain and other Public Utility System Improvements.....	43
<b>CHAPTER 8: REGIONAL ASSETS AND MULTI-JURISDICTIONAL COORDINATION.....</b>	<b>45</b>
Existing LOSSAN Railroad Corridor.....	45
Pacific Coast Highway.....	45
Wheeler North Reef Phase Three Expansion Project.....	45
Ongoing Resiliency Efforts and Additional Efforts for Consideration.....	46



<b>CHAPTER 9: FUNDING OPPORTUNITIES AND MECHANISMS FOR RESILIENCY</b> .....	<b>48</b>
Establishment of a Shoreline Account.....	48
California State Parks, Division of Boating and Waterways Grants.....	48
Geologic Hazard Abatement District.....	49
Infrastructure Financing Districts.....	49
Dedicated Sales or Transient Occupancy Tax (TOT) Increase.....	49
Local Hazard Mitigation Planning and Pre-Disaster Assistance.....	50
Impact Mitigation Fees or In Lieu Fees: Sand Mitigation / Public Recreational Impact Fees.....	50
California Infrastructure and Economic Development Bank.....	51
Green Bonds.....	51
Proposition 1 and Proposition 68 Grant Opportunities.....	51
<b>CHAPTER 10: CONCLUSIONS, RECOMMENDATIONS AND NEXT STEPS</b> .....	<b>52</b>
Financing Strategies.....	53
Future Technical Studies and Analyses.....	53
Public Outreach and Community Involvement.....	54
Multi-Agency and Regional Coordination.....	54
Monitoring Sea Level Rise and Implementation Actions.....	54
<b>CHAPTER 11: REPORT PREPARERS</b> .....	<b>56</b>
<b>CHAPTER 12: REFERENCES</b> .....	<b>57</b>

**LIST OF FIGURES**

Figure 2-1. CCC Overview of SLR Planning Process.....	11
Figure 3-1. Oceanside Littoral Cell Map.....	14
Figure 3-2. San Juan Creek Delta, April 2005.....	15
Figure 4-1. North and Central Reach – San Clemente.....	18
Figure 4-2. South Reach – San Clemente.....	18
Figure 4-3. Existing Railroad and Revetment in San Clemente.....	19
Figure 7-1. Living Shoreline / Dune Concept.....	38
Figure 7-2. Cross-Shore Rock Revetment.....	42

**LIST OF TABLES**

Table 4-1. Resources and Assets at Risk in San Clemente.....	17
Table 7-1. Ongoing Resiliency Strategy-Winter Storm Berm Program.....	33
Table 7-2. Ongoing Resiliency Strategy – USACE Project.....	35
Table 7-3. Proposed Strategy-Living Shoreline/Dunes/Cobble Berm.....	37
Table 7-4. Proposed Strategy-Sediment Management.....	39
Table 7-5. Proposed Strategy-Sand Retention Structures.....	41
Table 7-6. Proposed Strategy-Storm Drain Improvements.....	44

## Executive Summary

The City of San Clemente (City) Coastal Resiliency Plan (Plan) serves as the City's near-term and long-range planning and guidance document to address future potential sea-level rise (SLR) and its effects on storm surge, shoreline erosion, and coastal flooding in the City. The purpose of the City of San Clemente Coastal Resiliency Plan (Plan) is to begin to outline the elements of a phased adaptation approach to SLR that builds on the findings and recommendations contained in the City's [2019 Final Sea Level Rise Vulnerability Assessment \(SLRVA\)](#). The Plan identifies the actions, strategies, plans, and programs that the City can implement to improve long-term coastal resiliency in San Clemente.

This Plan was funded in part by the California Coastal Commission (CCC) grant LCP-18-05 awarded to the City to support the City's Local Coastal Program (LCP). The Plan was presented to the City's Beaches, Parks and Recreation Commission in October 2021 and the City's Planning Commission in November 2021 and the City Council in December 2021. The Plan was published for a six week public comment period from through October 7 through November 18, 2021. Comments received by the City have been reviewed and this updated version of the Plan incorporates public input received.

### Overview of Sea Level Rise (SLR) Hazards in San Clemente

Vulnerability to Sea Level Rise (SLR) is a product of several variables including:

- Exposure to coastal hazards including shoreline erosion, flooding, and inundation;
- Sensitivity to coastal hazards including potential for damage or loss of function; and
- Adaptive capacity, which is the ability to restore function or avoid damage.

San Clemente is affected by several coastal hazards, summarized here and discussed in full detail in the [SLRVA](#). Due to a general lack of sediment supply in the littoral cell, shoreline erosion is an existing challenge faced by the City, and the region, and is anticipated to accelerate with SLR. In San Clemente, shoreline erosion is expected to continue to be the primary hazard affecting coastal resources, existing structures and critical public infrastructure. For San Clemente, the dry beach area and potentially the intertidal zone (i.e., area between the high tide and the low tide) landward of the existing railroad revetment and seawall are at risk of permanent loss with rising seas.



According to the [2013 Orange County Coastal Regional Sediment Management Plan \(OCCRSM\)](#) prepared by the County of Orange (in partnership with California State Parks and the U.S. Army Corps of Engineers (USACE)), the City's beaches are host to 3 million visitors per year, generating \$87 million dollars in spending annually as of 2013. The OCCRSM also notes that the City's beaches are identified as critical erosion hot spots.

Enhancements and additions to ongoing, proactive coastal hazard reduction measures will continue to be necessary to address potential increases in hazard levels due to SLR. Resiliency measures within this

Plan focus on direct protection from current hazards and future SLR hazards through both nature-based solutions and soft and hard (i.e., green and grey) structural means.

### Scenarios Evaluated in the San Clemente SLRVA

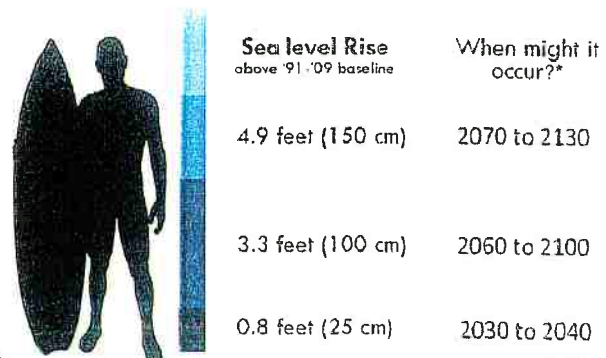
Due to the existing trends of shoreline erosion affecting San Clemente and many other jurisdictions throughout the region, any amount of SLR is anticipated to exacerbate existing (baseline) hazard conditions due to the long-term reduction in littoral sediment delivered to the coastline south of Dana Point from the San Juan Creek. In the absence of active, comprehensive, and long-term beach sand replenishment efforts, this net reduction of sediment delivery to the coastline results in an eroding shoreline. As sea levels rise over longer time horizons, there are notable thresholds with progressively greater impacts that will drive the need for one or more resiliency or adaptation measures to be implemented as part of a phased adaptation to SLR. Below are key SLR thresholds identified in the City’s SLRVA for each SLR scenario and the resources predicted to be most at risk from coastal hazards in the absence of any intervention or action by the City or others (i.e., no action alternative).

- **0.8 feet SLR (25 cm):** Existing sandy beaches erode and lose about half their width, some areas (North Beach and Mariposa Point) erode completely to the railroad impacting coastal access, recreation, and the environmental resources seaward of the railroad. Structures on the beach, including the City’s Municipal Pier and Marine Safety Building, are vulnerable to more frequent storm-related flooding, damage, erosion, scour, and undermining.
- **3.3 feet SLR (100 cm):** Most sandy beaches are eroded up to the railroad revetment or railroad seawall, small beaches may exist seasonally and at low tide. Shoreline erosion projections indicate this may be close to a threshold point for the railroad corridor as the railroad would be subject to repeated wave attack and flooding during high tides and storm events.
- **4.9 feet SLR (150 cm):** In the SLRVA, this scenario assumed a worst case analysis where the railroad and revetment was relocated / removed from its current location. Under this assumption shoreline erosion could reach the coastal bluffs landward of the railroad revetment or railroad seawall. Bluff top land and existing structures would be vulnerable to bluff failures resulting from increased wave action at the toe in the absence of the protective railroad revetment and assuming no other resiliency building actions are taken by the City or others.

### Future SLR Timing and Uncertainties in the Model Projections

The California Coastal Commission (CCC) recognizes the [State of California Sea-Level Rise Guidance \(OPC 2018\)](#), released in March 2018 by the Ocean Protection Council (OPC), as the “best available science” on SLR along the coast of California. The OPC 2018 Guidance uses a probabilistic approach to generate a range of SLR projections at a given time horizon.

For the 2050 time horizon the “likely range” of SLR is between 0.7 to 1.2 feet. According to the model predictions, there is a 66% probability that SLR will fall within this range during this time horizon. The OPC 2018 guidance document also acknowledges the potential for less probable scenarios that result in higher amounts of SLR. These more conservative, lower probability scenarios indicate there is a 0.5% chance that SLR reaches 2 feet by 2050. Looking at



the likely range and low-probability scenarios, the 0.8-foot SLR scenario analyzed in the SLRVA would most likely occur in the 2040-2050 timeframe, but there is a very slight chance it could occur sooner. The "likely range" of SLR for the 2100-time horizon is 1.8 to 3.6 feet, but there is a 0.5% chance SLR reaches 7.1 feet by 2100. The range of projections at these more distant time horizons increases significantly due to uncertainties associated with (1) future Greenhouse Gases (GHG) emissions, (2) the physical processes affecting how the Antarctic ice sheets may respond to such scenarios, (3) and many other factors/variables involved in global climate projections. A 3.3-foot SLR scenario would most likely occur near the end of this century (i.e., by 2100), but there is a very slight chance (0.5% chance) it could occur by 2070. The 4.9-foot SLR scenario is regarded as likely to occur in the 2130-2140 timeframe, but there is a 0.5% chance it could occur sooner, in the 2080-2090 timeframe.

The OPC 2018 Guidance also lays out a risk decision framework around which SLR projections to use. In general, the guidance suggests projects involving critical public infrastructure consider the upper range of SLR projections and impacts at a given time horizon. For projects where potential consequences from SLR damage would be more tolerable, the lower SLR projections can be used for planning and design purposes. The OPC Guidance provides SLR projections for low, medium-high and critical risk aversion applications, but these three categories alone do not reflect the entire range of probabilistic projections which continue to be highly dynamic both in magnitude and probability of occurrence. The range between the low risk and medium-high risk aversion projections should be thoroughly considered when trying to align SLR projections with risk tolerance of a specific project, and more detailed assessments of risk tolerance may be warranted with local site specific analyses and input from the community before implementing resiliency/adaptation measures. It may also be useful to evaluate the joint probability SLR and a natural hazard event (e.g. 100-year coastal storm or tsunami) can provide in understanding the potential probability and consequence of each SLR planning scenario.

All of these uncertainties in the model projections, combined with our growing understanding of the complex inter-relationships and feedback loops associated with global climate change, underscore the vital importance of closely monitoring local and regional sea levels, tracking local shoreline conditions, and developing a plan of action based on quantified/measured data to ensure that the City of San Clemente remains resilient to SLR.

### **Coastal Resiliency Building & Adaptation Planning: A Phased Approach**

The SLRVA identified the City's SLR related vulnerabilities from coastal hazards and outlined potential adaptation strategies generally categorized as "Protect", "Accommodate" or "Retreat" strategies. This Plan takes that initial analysis contained in the SLRVA and expands it to include a description of the phased approach the City is taking in terms of actions, plans, and programs that the City has already begun to implement as well as additional measures recommended for consideration by the City over a longer planning horizon to improve coastal resiliency.

Adaptation to climate change involves a range of small and large adjustments to natural and/or human systems that occur in response to already experienced or anticipated climate change impacts. Adaptation planning involves a wide range of policy, programmatic, and project-level measures that can be implemented in advance of, or reactively to the potential impacts depending on the degree of preparedness and risk tolerance. Good adaptation planning should enhance community resilience to hazards and natural disasters and should stem from full disclosure and a solid understanding of the City's specific risks, the projected timing of impacts, and the physical processes responsible for causing the risk, now and in the future. This Plan provides a framework for the City to manage risks and take

actions based on monitoring of sea-level rise and its effects, all of which are guided by the City's long-term vision for the community.

The City's phased implementation approach to coastal resiliency is based on close monitoring of the nearest local tide gages for SLR signals that the thresholds identified in the SLRVA are being approached. This Coastal Resiliency Plan (Plan) sometimes referred to as an "Adaptation" Plan identifies various municipal actions, regional actions, coordination activities, and various SLR adaptation strategies that can be pursued by the City to supplement the existing coastal resiliency plans, programs, and projects currently implemented or planned to be implemented in the City.

Most cities will likely consider a range of options in their adaptation strategy toolbox, and San Clemente is no exception to this. Retaining a wide range of options on the table helps to ensure that the City retains maximum flexibility in determining how best to carry out its long-term vision for its community.

Considering a range of options is also prudent as the understanding of climate science continues to improve in terms of both its predictive capabilities and its ability to identify the most probable local scenarios. Monitoring of SLR is an important component of adaptation planning, and future updates to the LCP will reflect updated climate science, predictions, scenario probabilities, and possibly a wider range of adaptation strategies to consider.

The City is currently working with the USACE and State Parks to implement a 50-year "Coastal Storm Damage Reduction Project" beach sand replenishment program to address shoreline erosion, and this is anticipated to remain one of the primary adaptation tools utilized by the City to maintain its shoreline and public beaches. A full discussion of this effort is included in Chapter 7 of this Plan. Given that this 50-year project has been in development by the City since 2000 (i.e., initiation of the Reconnaissance Phase), San Clemente is ahead of many other cities who are just beginning the process of coastal resiliency planning. It should also be noted that the fact that this project has been in development for two decades underscores the long lead times associated with implementing a coastal resiliency project due to all of the necessary steps and funding commitments that must be secured federally from the state and well as the City.

### **HIGH PRIORITY ADAPTATION MEASURES, ACTIONS AND PROJECTS**

High priority sea-level rise adaptation measures for the City to begin planning now for all structures located on the public beach and landward seaward of the existing railroad and revetment/seawall including:

- Protection of the public beach and related public amenities
- Protection of public beach accessways
- Evaluate resiliency measures for the City's Marine Safety Division Headquarters
- Evaluate resiliency measures for other critical City infrastructure and utilities

The Coastal Resiliency Plan has been developed with the input of CCC staff and designed to be consistent with the California Coastal Act and relevant City and State policies, plans, and guidelines. The guiding principles behind the Plan are to minimize risks to San Clemente's assets, including property, utilities and infrastructure, and protect local coastal resources, which, as defined by the California Coastal Act, include coastal development; public access and recreation; coastal habitats; Environmentally Sensitive Habitat Areas and wetlands; water quality and supply; archaeology and paleontological resources; and scenic and visual resources. A key coastal resource is the sandy beach, which is valuable in terms of public

enjoyment, community well-being, and ecosystem services such as storm damage protection and intertidal habitat for species including shorebirds and grunion.

The Plan includes a range of sea-level rise adaptation measures within the following general categories of adaptation:

- ▶ **Accommodation:** “Accommodation strategies refer to those strategies that employ methods that modify existing developments or design new developments to decrease hazard risks, and, thus, increase the resiliency of development to the impacts of sea-level rise.” (CCC 2018)
- ▶ **Protection:** “Protection strategies refer to those strategies that employ some sort of engineered structure or other measure to defend development (or other resources) in its current location without changes to the development itself.” (CCC 2018). Protection strategies can include structures such as seawalls and revetments as well as nature-based solutions such as beach nourishment, sediment management, or living shorelines to name a few.
- ▶ **Retreat:** “Retreat strategies are those strategies that relocate or remove existing development out of hazard areas and limit the construction of new development in vulnerable areas.” (CCC 2018)

Consistent with the California Coastal Commission Sea-Level Rise Policy Guidance (2018) including the [2021 Draft CCC SLR Guidance for Critical Infrastructure](#) and current environmental practice, the Coastal Resiliency Plan includes hybrid strategies which combines elements of these approaches, nature-based adaptation strategies including hybrid structures or living shorelines or green infrastructure solutions, and multi-objective measures that incorporate environmental considerations, rather than focusing on single-purpose or single benefit solutions.

### Key Recommendations in the San Clemente Coastal Resiliency Plan

Chapter 10 of the Coastal Resiliency Plan describes the conclusions, recommendations and next steps that the City can take to advance coastal resiliency in San Clemente. The top near term recommendations are listed here:

- Continue to track water levels measured at the existing [NOAA tide gage in La Jolla](#) that has been operating since 1925 (with published corrections for San Clemente) for signals of rapidly accelerating sea level rise (the published data for this site currently indicates a long-term linear rate of sea level rise of 0.26 mm/year).
- Re-establish an ongoing, annual shoreline monitoring program consisting of spring and fall shoreline profile transect monitoring to document the condition of the City’s beaches and to establish baseline conditions now, against which future sea level rise effects can be quantified.
- Prepare a feasibility study to identify critical erosion hot spots in the City and develop one or more pilot projects that provide multiple benefits (e.g., sand retention and ecosystem benefits) such as a living shoreline, coastal dune system or cobble berm structure.
- Establish a regional shoreline management working group to collaborate, cost share and implement regional coastal resiliency solutions. Convene a stakeholders meeting in early 2022.
- Submit a grant application to the [California Coastal Commission](#) in December 2021 to obtain grant funding support for Coastal Resiliency Plan implementation actions, programs and projects.
- Explore opportunities to establish a geologic hazard abatement district in the City
- Establish a Capital Improvement Program (CIP) fund dedicated to funding coastal resiliency programs and projects and develop dedicated funding source(s).
- Consider re-establishing the City’s Opportunistic Beach Sand Placement Program

## Chapter 1: Coastal Resiliency and Adaptation Planning Overview

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The Coastal Resiliency Plan provides a range of adaptation options that the City may implement to address existing and future SLR-related vulnerabilities within its jurisdiction. The adaptation strategies included within this Plan are developed specifically with the intent of minimizing damage to critical infrastructure, resources and assets that are projected to be vulnerable as identified within the City's 2019 Sea Level Rise Vulnerability Assessment (SLRVA). These strategies have been developed with consideration of recommended strategies within California Coastal Commission (CCC) *Sea-Level Rise Policy Guidance* (2018) and input from stakeholders, the Planning Commission, City Council, and the public.

During the course of the multi-year public outreach effort on the SLRVA, conducted from November 2017 through December 2021, the City received comments, input and suggestions from the public, members of the City's Coastal Advisory Committee, Beaches, Parks and Recreation Commission, Planning Commission, City Council, and CCC staff, which have been used by the City to refine the scope and contents of this Coastal Resiliency Plan:

- The City should continue to move forward with the federal sand replenishment project in partnership with the USACE and State Parks.
- The City should pursue regional partnerships to address SLR and coastal resiliency and should consider partnerships with the County of Orange, OCTA, Caltrans, City of Dana Point, SANDAG, Camp Pendleton, and California State Parks to implement regional SLR resiliency strategies.
- The City should pursue additional education and public outreach opportunities within the community, including in schools, to inform citizens about the risks of SLR.
- The City should reestablish a shoreline / beach monitoring program that is conducted each spring and fall on an annual basis.
- The City should make a commitment to future SLRVA updates on a ten-year basis.
- The City should identify a beach nourishment strategy for North Beach.
- The City should pursue additional technical studies including participating in an update of the Orange County Coastal Regional Sediment Management Plan.
- The City should pursue other adaptation measures such as building offshore sand retention structures like artificial reefs similar to those already constructed offshore of the City.
- The City should commit to providing education to the constituents on the impact from SLR to the beaches and shoreline. This could occur through the City website and/or City-sponsored lectures, printed educational materials, etc.
- The City should develop a comprehensive adaptation approach and develop a plan that looks at utilization of the watershed to restore natural sediment flows in conjunction with an update to the 2013 Orange County Coastal Regional Sediment Management Plan.
- The City may consider relocating roadways, railways, and infrastructure from the shoreline and allowing coastal processes to be restored to a more natural state.
- Benefit - cost analysis must be conducted for any adaptation strategies considered by the City in the Coastal Resiliency Plan.
- Loss of beaches means loss of the coastal economy and recreational opportunities.
- The City should use the LCP process to ensure consistency with the Coastal Act and address SLR.

- The City should prioritize “soft” or “green” strategies such as cobble, sand and dune restoration, living shorelines, and hybrid approaches to protect existing development.
- The presence of the railroad revetment/seawall uniquely constrains the City and its ability to respond to SLR. Conversely, the presence of the railroad also may also provide protection for all existing structures landward of the alignment of this critical public infrastructure system.
- The SLRVA did not include an evaluation of the extreme SLR scenario now recommended by the OPC and CCC (i.e., H++). While the likelihood and/or probability of this scenario is unknown, there is critical public infrastructure and other existing structures along the coast and potential impacts under an extreme scenario should be evaluated by applicable/relevant agencies that own, operate or otherwise are responsible for managing said infrastructure/existing structures.

The Plan identifies both strategies that are programmatic that could be applied regionally and specific strategies that could be applied locally. Policy approaches to adaptation would be implemented through the certified Local Coastal Program (LCP), Land Use Plan (LUP), and/or Implementation Plan (IP). Other strategies include approaches or projects that are based on regional coordination, planning, and implementation with other organizations. Several of the City’s adaptation strategies address regional transportation assets outside of its jurisdiction that are of great importance to the City. Such strategies would benefit regional assets such as the Los Angeles–San Diego–San Luis Obispo Rail Corridor (LOSSAN Corridor) and Pacific Coast Highway. Successful implementation relies on regional, state and federal coordination and funding.

A goal of this Plan is to increase the understanding of the vulnerabilities associated with coastal hazards and encourage consideration of these impacts. As this is the beginning of the City’s process of developing its adaptation responses, many initiatives are exploratory in nature at this time and aim to identify potential actions to respond to the impacts of concern. Recommendations and next steps are identified within Chapter 10, although resiliency / adaptation measures are subject to change and further refinement over time.

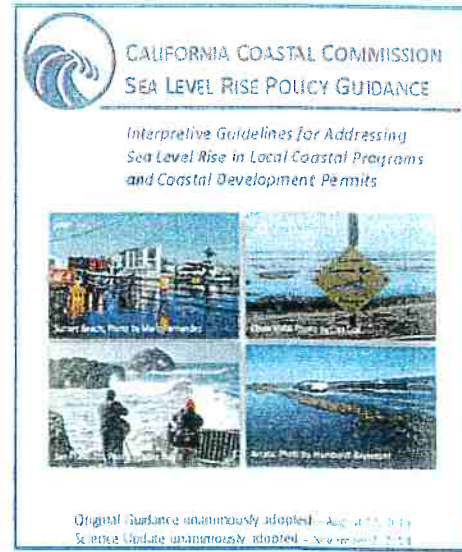
The Coastal Resiliency Plan is intended to establish a process in which new data and information are assessed to inform adaptation decisions and actions. As such, it is anticipated that the Plan may be re-evaluated and updated based on new science, technology, and practices. For example, the Coastal Resiliency Plan may be re-evaluated and updated periodically as needed or when new major developments in the field of SLR best available science or SLR adaptation occur.



## Chapter 2: State of California Guidance

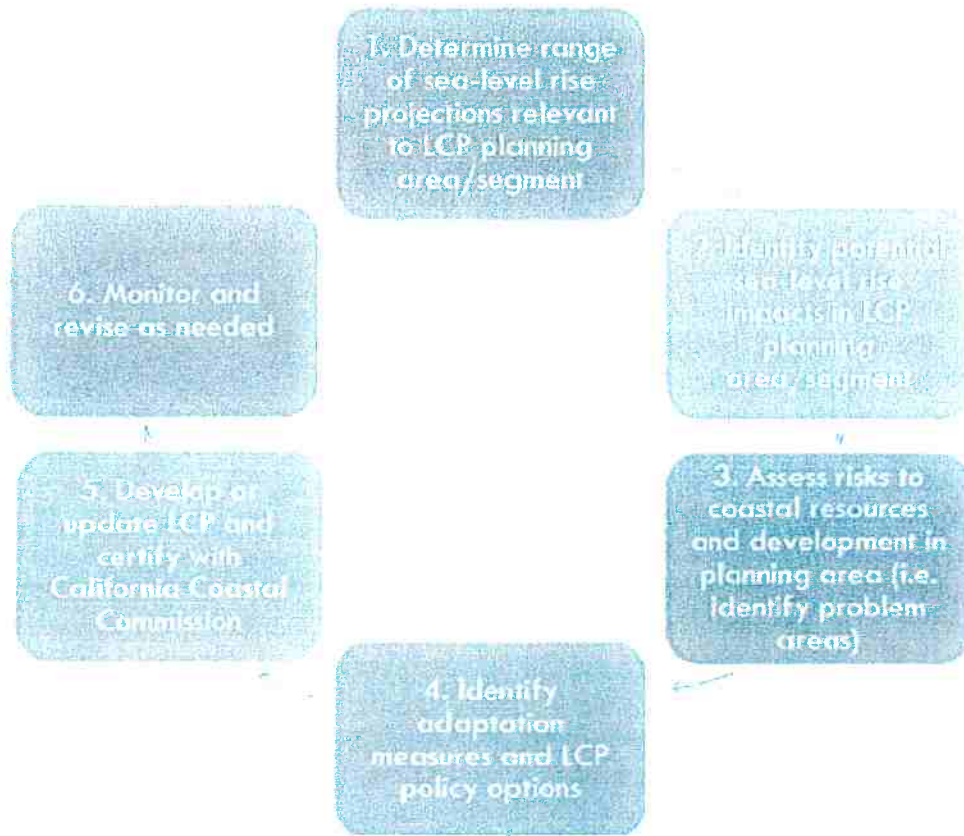
The California Coastal Commission (CCC) issued guidance in August 2015 and revised/updated SLR Guidance in 2018 on how to apply the Coastal Act to the challenges presented by SLR through Local Coastal Program (LCP) certifications and updates and Coastal Development Permit (CDP) decisions. The [CCC 2018 SLR Guidance](#) organizes current science, technical, and other information, and practices into a single resource intended to support implementation of the Coastal Act by coastal managers at the state and local level. The CCC Guidance generally categorizes adaptation measures as Protect, Accommodate, or Retreat based measures as described further below.

- › **Protection:** "Protection strategies refer to those strategies that employ some sort of engineered structure or other measure to retain development (or other resources) in its current location without changes to the development itself. Protection strategies can be further divided into "hard" and "soft" measures. "Hard" refers to engineered structures such as seawalls, revetments, and bulkheads that defend against coastal hazards like wave impacts, erosion, and flooding per [Coastal Act Section 30235](#). "Soft" refers to the use of natural or "green" infrastructure like beaches, dune systems, living shorelines, and other systems to buffer coastal areas. Strategies like beach nourishment, dune management, or the construction of "living shorelines" capitalize on the natural ability of these systems to protect coastlines from coastal hazards while also providing benefits such as habitat, recreation area, more pleasing visual impacts, and the continuation or enhancement of ecosystem services."
- › **Accommodation:** "Accommodation strategies refer to those strategies that employ methods that modify existing developments or design new developments to decrease hazard risks and thus increase the resiliency of development to the impacts of sea-level rise."
- › **Retreat:** "Retreat strategies are those strategies that relocate or remove existing development out of hazard areas and limit the construction of new development in vulnerable areas. These strategies can include land use designations and zoning ordinances that encourage building in more resilient areas or gradually purchasing or removing and relocating existing development."



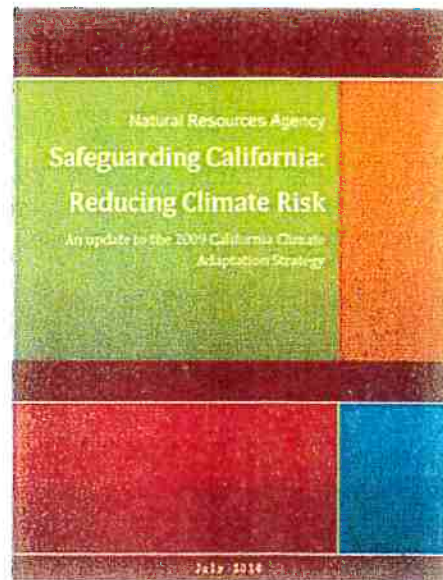
The San Clemente Coastal Resiliency Plan was prepared consistent with the guidelines in the CCC 2018 SLR Guidance document. The following graphic shows the basic SLR planning process provided in the Coastal Commission's *Sea Level Rise Policy Guidance*, with steps 1-3 conducted as part of the San Clemente Sea Level Rise Vulnerability Assessment and steps 4-6 occurring as part of the coastal resiliency planning and adaptation planning efforts. As shown by the above graphic, the planning process is intended to be iterative in nature over time.

Figure 2-1. CCC Overview of SLR Planning Process



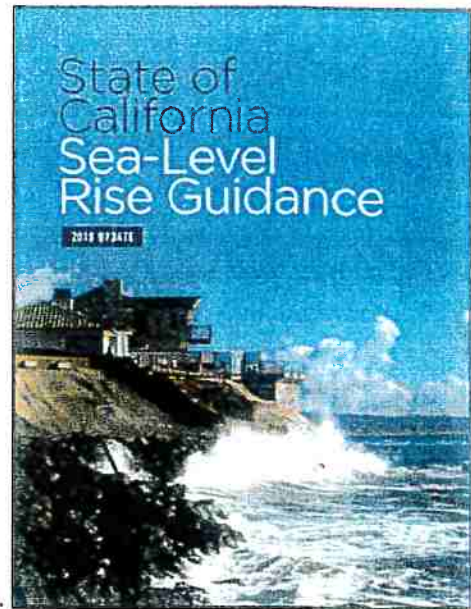
**Safeguarding California Plan: Reducing Climate Risk**

The 2014 Safeguarding California Plan (California Natural Resources Agency) provides policy guidance for state decision makers to address climate risks in nine sectors in California, describes progress to date, and identifies sector-specific recommendations. Risk management strategies to reduce climate risk are identified for the following nine sectors: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water. Applicable risk management strategies from this document were incorporated into this Plan.



### Ocean Protection Council 2018 Sea-Level Rise Guidance

The "[State of California Sea-Level Rise Guidance](#)" (OPC 2018), provides a bold, science-based methodology for state and local governments to analyze and assess the risks associated with SLR, and to incorporate SLR into their planning, permitting, and investment decisions. This Guidance provides a synthesis of the best available science on SLR projections and rates for California; a step-by-step approach for state agencies and local governments to evaluate those projections and related hazard information in decision making; and preferred coastal adaptation approaches. The OPC Sea-Level Rise Guidance Document was also used as a key resource in both the development of the City's SLRVA as well as this companion Coastal Resiliency Plan.



## Chapter 3: Approaches to Building Coastal Resiliency

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### Understanding Coastal Processes

Coastal processes are the forces that drive the movement of sand (littoral sediment), leading to beach stability, beach erosion, or beach accretion (growth). These processes are directly affected by SLR. Coastal erosion and accretion patterns have always existed, and these coastal processes have long contributed to the present coastline that exists in San Clemente.

Coastal processes that affect SLR hazards often extend beyond the local scale. Participating in regional hazard mitigation planning can substantially increase the efficiency and cost-effectiveness of SLR resilience measures. Resiliency measures within this Plan include a focus on potential regionally coordinated programs that could benefit coastal resources in San Clemente and beyond.

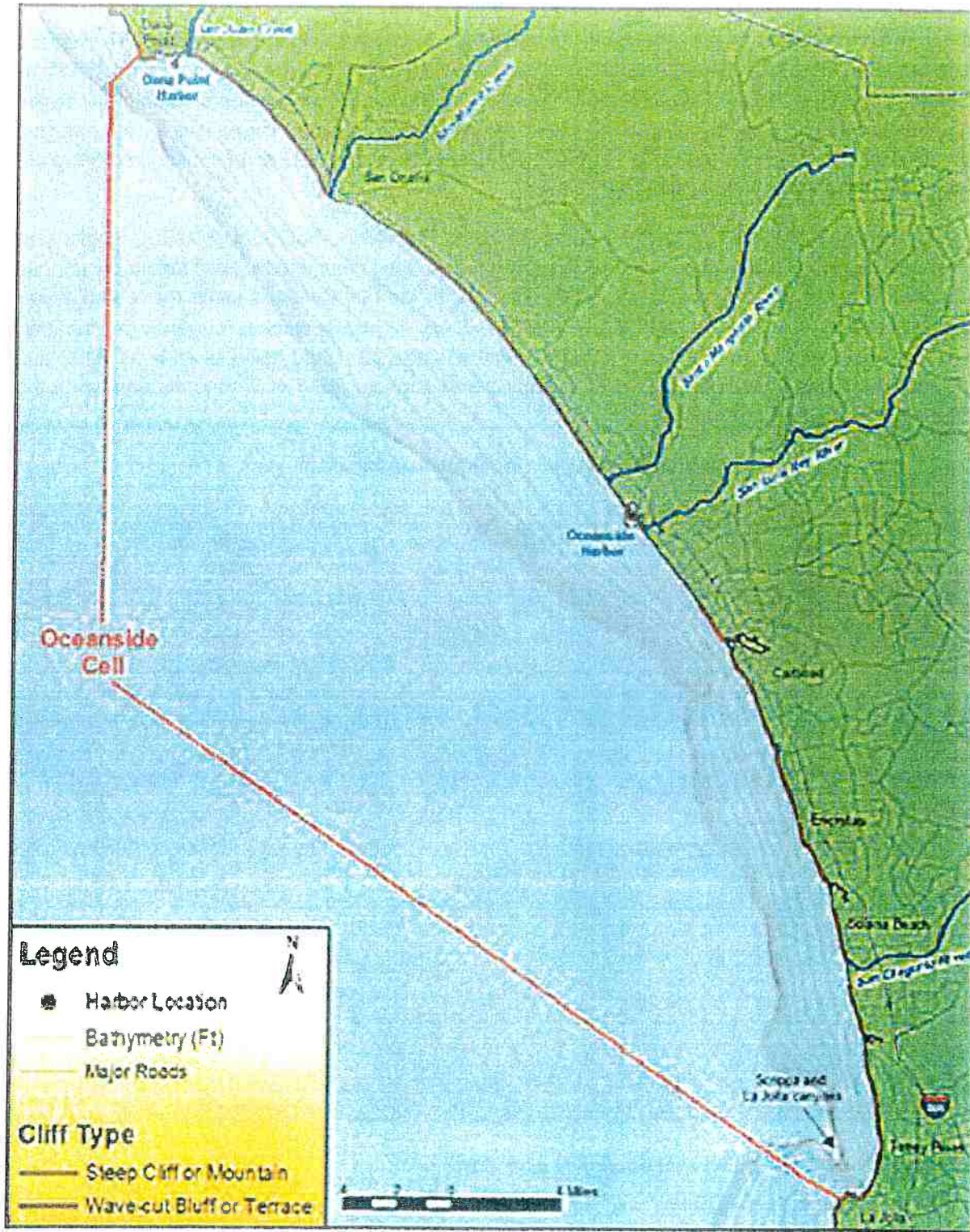
The California coast is separated into discrete geographic areas called “littoral cells.” Littoral cells are the areas where sediment moves in various directions such as up coast or downcoast or onshore or offshore. Other features such as submarine canyons and headlands are also part of the coastal environment. The City of San Clemente is located in the Oceanside Littoral Cell.

The Oceanside Littoral Cell extends approximately 50 miles from Dana Point Harbor south to La Jolla and Scripps Submarine Canyons. The Oceanside Littoral Cell is physically divided by Oceanside Harbor's north jetty, which effectively eliminates significant transport of littoral sand from the northern portion of the littoral cell to down coast of the Harbor. The shoreline of this cell consists of a continuous, narrow beach backed by sea cliffs or bluffs with the exception of the mouths of coastal rivers, streams, and harbors. Rocky headlands form the northern and southern boundaries of this cell. Sand entering the Oceanside Littoral Cell moves southward in the direction of the net alongshore transport and eventually enters the heads of La Jolla and Scripps submarine canyons, which are offshore within a few hundred yards offshore of the shoreline.

Depending on whether a littoral cell has a net positive or negative sediment budget, beaches will either be in a widening (accretion) or eroding condition. The Oceanside Littoral Cell has a net sediment deficit, which is why beaches are generally in an erosive condition. This condition is anticipated to worsen with SLR and is the main reason that steps need to be taken to ensure the beaches continue to function as a natural protective buffer from wave action and naturally protects the beaches and bluffs.

A study by Coastal Environments (2014) provided an assessment of littoral sediment transport patterns and a sediment budget for the coast between Dana Point and San Mateo Point (Dana Point Sub-cell). Data was aggregated from sediment studies spanning the 1980s to the 2000s, and it was estimated that the sediment budget for the Dana Point Sub-cell is in a 56,000 CY per year deficit (erosion) in dry years, and in a 3,000 CY per year surplus (accretion) in wet years. This disparity between wet and dry years is part of the reason that droughts affect shoreline erosion by further limiting the amount of sediment that is delivered to the beach from fluvial sources such as the San Juan Creek.

Figure 3-1. Oceanside Littoral Cell Map



Beach nourishment has not provided a significant source of sediment to the littoral cell since the 1960s when over 1.6 million cubic yards of sediment was placed at the San Juan Creek mouth from upland and

sea cliff sources, construction activities along San Juan Creek, and Dana Point Harbor construction. Figure 3-2 below shows the delta that formed at the mouth of San Juan Creek in 2005.

Other sediment management programs have included San Clemente's Opportunistic Beach Fill Program with project #1 adding 5,000 CY in 2005 and project #2 adding 12,000 CY of sand from Santa Ana River dredging in December 2016. In 2019, the City put opportunistic beach sand projects on hold due to the rising costs of regulatory compliance, which makes small opportunistic projects no longer cost effective for the City. USACE Regional General Permit (RGP) 66 for the San Clemente Beach Nourishment Program expired in February 2018 and has not been renewed.

The CCC approved the USACE Coastal Storm Damage Reduction Project, a 250,000 cubic yard nourishment project, in 2014. The USACE project EIR/EIS has been completed with all regulatory permits having been secured, and the project has been authorized by the U.S. Congress under the federal Water Resources Reform and Development Act (WRRDA) of 2014. The project is currently in the Pre-Construction, Engineering and Design (PED) Phase and construction could begin as early as 2022 and would extend through a federally authorized 50-year period through 2072 or beyond depending on the start date.

**Figure 3-2. San Juan Creek Delta, April 2005**



### Resiliency Project Planning and Project Lead Times

The Coastal Resiliency Plan identifies adaptation measures at a conceptual planning-level of detail and discusses potential benefits and effects of adaptation measures. Additional detailed project-level planning and design would be required to implement adaptation measures. For adaptation measures involving construction, the project-level planning and design may include:

- Feasibility study including additional technical analyses, development and assessment of project alternatives and details, conceptual and preliminary engineering design, and cost estimating.
- California Environmental Quality Act (CEQA) and possibly National Environmental Policy Act (NEPA) environmental review and regulatory permitting.
- Final engineering design.

Lead time is required to perform project-level planning, environmental review and permitting, design, securing funding, and implementation or construction. All resiliency options discussed in this Plan require substantial lead time. For example, the City has been working to develop the USACE project for approximately 20 years with anticipated lead times in mind, the City will be able to begin advanced planning before adaptation measures need to be in place to limit risks and exposure.

### Managing Development in Hazard Areas – LUP Policies

The [City's 2018 comprehensive LUP Update](#) addressed this topic extensively. Siting and construction standards in new coastal development or redevelopment projects represent opportunities to reduce SLR hazard impacts to new and existing development. Adaptation measures within this Plan focus on encouraging development to reduce exposure to coastal hazards over the duration of development.

The City has established a policy that new development must be sited in a way that avoids coastal hazards, protects coastal resources, and minimizes risk to life and property to the maximum extent possible for the anticipated life of the development, accounting for future hazards due to SLR. New development must be sited in a manner that does not require construction of new shoreline protective devices that substantially alter natural landforms to provide geologic stability. New development along bluff tops must meet a required setback from the bluff top inland of which stability can be reasonably assured for the duration of development without need for shoreline protective devices.

Major redevelopment thresholds within hazard areas will become subject to the standards of new development if a structure is altered in a manner that equals or exceeds 50% of the existing structure before the start of construction or results in the demolition of 50% of the structure. Improvements to existing legally non-conforming structures in hazard areas must not increase the hazardous condition of the structure by developing seaward or extending the anticipated duration of development in a non-conforming location.

### Community Outreach and Involvement

Maximizing public participation is a core principle in the CCC *Sea Level Rise Policy Guidance* (CCC 2018 SLR Policy Guidance). The following best practices are considered essential for successful outreach efforts:

- Gain common understanding by making SLR science tangible. Using layperson's terminology and avoiding technical discussions is key to engaging the general public.
- Emphasize public safety to develop an understanding of the urgency.
- Conduct both targeted outreach and community-wide engagement to obtain valuable feedback from a variety of perspectives.
- Ensure regular updates throughout the process to maintain public and political support. Once members of the public and political leadership have engaged in the process, it is important to continue and maintain the engagement with regular updates and opportunities to provide feedback throughout the resiliency building process.

## Chapter 4: Overview of Vulnerabilities in San Clemente

The goal of the Coastal Resiliency Plan is to manage potential future sea level rise-related risks by keeping risks within an acceptable limit. The SLRVA identified resources and assets in the City at risk in the future from SLR with approximate SLR timing and probabilities from the 2018 OPC Guidance shown in Table 4-1 below. As indicated in this table, the timing of each SLR scenario varies greatly within the probabilistic projections of the 2018 OPC Guidance. The guidance lays out a risk decision framework around which SLR projections to use. In general, the guidance suggests high risk decisions, such as those involving important critical public infrastructure evaluate the upper range of SLR projections due to the potential future consequence of impacts from hazards associated with these scenarios. Lower risk applications, where consequences from potential future coastal damage would be more minimal may use lower SLR projections for design and planning.

**Table 4-1. Resources and Assets at Risk in San Clemente**

SLR Scenarios	0.8' of SLR	3.3' of SLR	4.9' of SLR
Resources and Assets At Risk	Coastal access & recreation Environmental resources Beach structures & amenities	Railroad operations Pier structure Access under-crossings Utilities (storm drain outlets and wastewater collection system)	Bluff top development All resources seaward of bluffs (if railroad is ever removed) Beach Trunk Sewer Line, sewer pump stations and recycled water line
Timeline for Projected Occurrence and Associated Probabilities	2040-2050 is likely range 0.5% chance in 2030	2100-2150 is likely range 0.5% chance in 2070	2130+ is likely range 0.5% chance in 2080

The San Clemente shoreline was divided into three reaches in the City's SLRVA for presentation and discussion of the potential hazards by area. These geographic areas are described below:

- **North Reach:** The North Reach extends from the northern City boundary with Dana Point to the Linda Lane public beach access point and consists of the North Beach recreational area and LOSSAN railroad revetment to the south. Capistrano Shores mobile home park community was excluded from the study area; however nothing in the City's Plan would limit or restrict the owners/operators of the Capistrano Shores community from implementing coastal resiliency strategies contained herein or otherwise available to them pursuant to Coastal Act Section 30235. North Beach varies in width from 15 to 100 feet (from 2017 aerial imagery) and is popular for recreational activities. The beach area is subject to seasonal erosion that has recently threatened the restroom building. Previously existing sand volleyball courts are no longer present.
- **Central Reach:** The Central Reach is a focal point of coastal recreation in the City and extends from Linda Lane to T-Street and includes the main beaches around the Pier and other facilities like the Marine Safety Building and restaurants at the base of the Pier. The beach in this area is relatively wider than in other areas of the City and varies from 80 to 130 feet (from 2017 aerial imagery). T-Street is a popular surfing area, and the nearshore reef helps dissipate storm wave energy and stabilize the sandy beach in this area (USACE, 2012).



- South Reach:** The South Reach extends from just south of T-Street at the Boca Del Canon beach access point to the southern City boundary. There is little development seaward of the LOSSAN Railroad Corridor along this reach. The beach width varies from 80 to 200 feet (from 2017 aerial imagery) with primary coastal access points at Avenida Calafia and San Clemente State Beach Park.

The North Reach and Central Reach are shown in Figure 4-1. The South Reach is shown in Figure 4-2.

Figure 4-1. North Reach and Central Reach - San Clemente

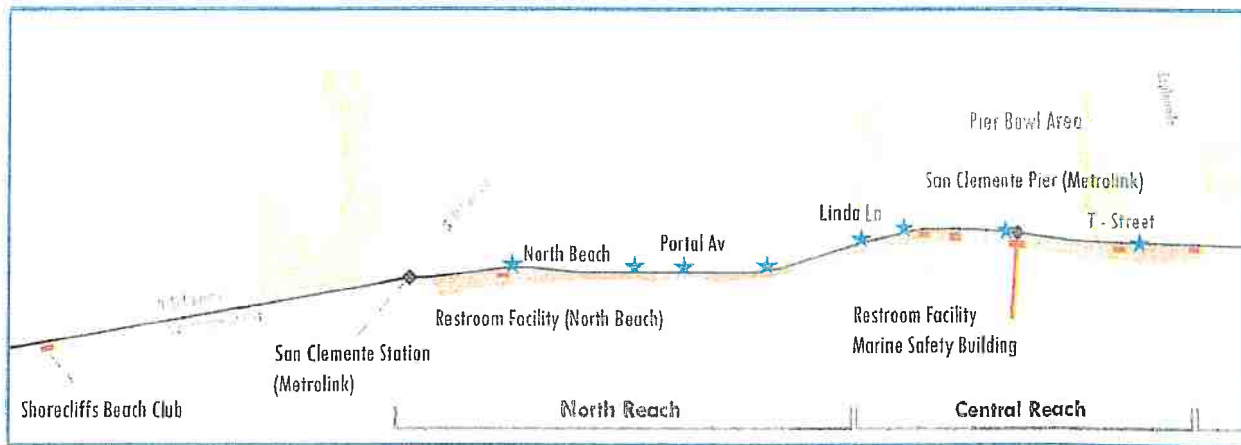
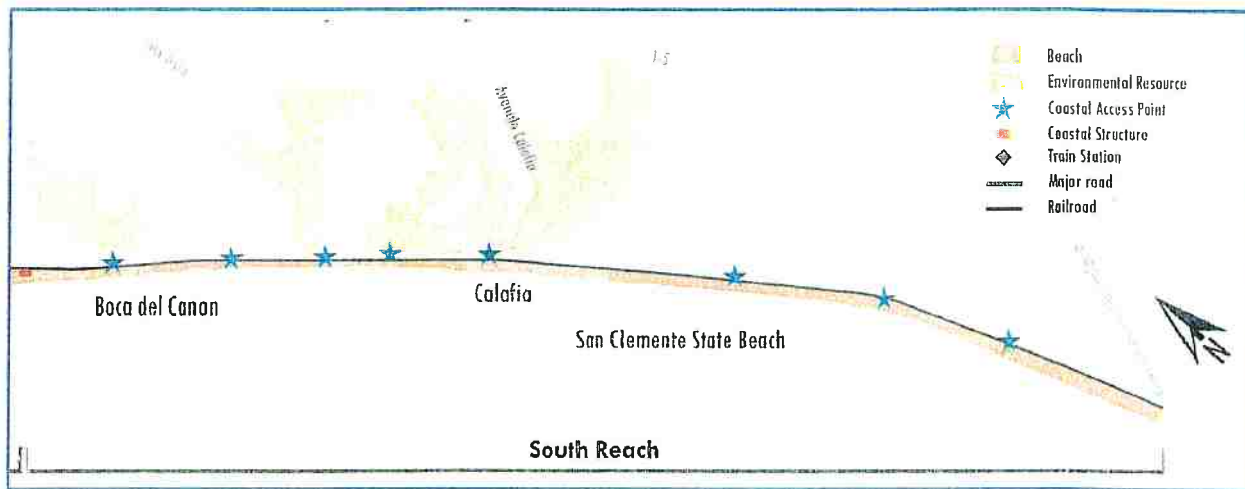


Figure 4-2. South Reach - San Clemente



### San Clemente Sea Level Rise Exposure - North Reach

The exposure of resources along the North Reach were evaluated in the SLRVA using worst case “No Hold-the-Line, No Beach Nourishment” shoreline erosion projections from CoSMoS-COAST. The results indicated 0.8 feet (25 cm) of SLR would cause 20 to 40 feet of shoreline erosion at North Beach and an additional 10-20 feet of storm erosion potential. Similar amounts of erosion are predicted at Poche Beach and the Shorecliffs Beach Club.

Sandy beach areas and access points along the North Reach are most exposed to impacts from shoreline erosion resulting from 0.8 feet (25 cm) of SLR. The LOSSAN railroad will also experience increased wave

action against the existing revetment. Nearly all assets have moderate to high exposure under a 3.3-foot (100 cm) SLR scenario. The CoSMoS shoreline projections indicate the active shoreline will be at or very close to the railroad corridor during non-storm conditions. The shoreline projections for a 4.9-foot SLR scenario indicate the shoreline would erode landward of the railroad corridor to the bluffs (using an assumption that the railroad is relocated or removed from service in the future). Under this scenario the bluffs would be subject to wave action exposing the bluff-top development to erosion hazards.

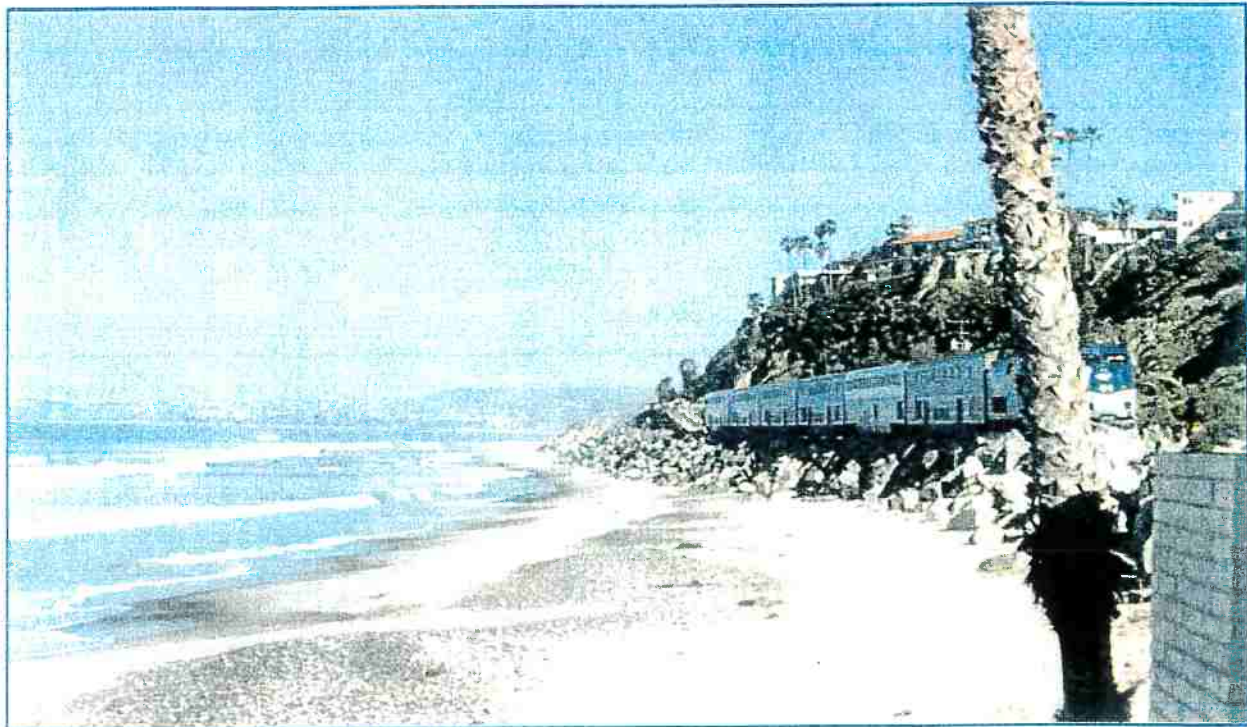
### Sea Level Rise Exposure – Central Reach

The results indicate 0.8 feet (25 cm) of SLR would cause about 30 feet of shoreline erosion and an additional 20 feet of storm erosion potential near the City's Municipal Pier. The City's Marine Safety Division Headquarters building has the highest non-storm exposure under this scenario due to its location on the beach. It is also projected that, given its past history of storm damage, rising seas will also increase exposure of the City's Municipal Pier to damage from large wave events.

Nearly all resources have moderate to high exposure under a 3.3-foot SLR scenario. The CoSMoS shoreline projections indicate the active shoreline will be at or very close to the railroad corridor during non-storm conditions impacting the coastal trail, access points such as the T-Street pedestrian bridge, and public restrooms. The railroad is not protected along much of the central reach. Therefore, SLR would subject the railroad to storm-related erosion in this scenario and, likely to be a catalyst for implementation of a resiliency strategy to prevent undermining.

The shoreline projections for a 4.9-foot SLR scenario indicate the shoreline would erode landward of the railroad corridor, to the bluffs (assuming the railroad is relocated or removed from service in the future). Under this scenario the bluffs would be subject to wave action exposing the bluff-top development to erosion hazards.

**Figure 4-3. Existing Railroad and Revetment in San Clemente**



### Sea Level Rise Exposure – South Reach

For the 0.8-foot SLR scenario, the sandy beach is exposed to some shoreline erosion but to a lesser degree than projected for the North and Central reaches. However, the 3.3-foot SLR scenario indicates significant exposure of all assets seaward of the railroad corridor. Roughly 100 feet of shoreline erosion is predicted under this scenario along with another 50 feet of storm erosion potential. The CoSMoS shoreline projections indicate the active shoreline will be at or very close to the railroad corridor during non-storm conditions potentially impacting the California Coastal Trail, public beach access points, and public restrooms. The railroad would be subject to storm-related erosion in this scenario, likely triggering the need for some type of resiliency / adaptation measures to be implemented.

The shoreline projections for a 4.9-foot SLR scenario indicate the shoreline would erode landward of the railroad corridor to the bluffs in the event that the railroad was relocated or removed from service in the future. The potential for shoreline erosion and the projections included in the SLRVA also were based on a worst-case analysis whereby no future USACE or other long-term or comprehensive beach nourishment program occurred. Under this worst-case scenario, the coastal bluffs would be subject to wave action exposing the bluff-top development to SLR-related erosion hazards.

### Range of Resource Categories Potentially Vulnerable to Sea Level Rise

The City identified potential SLR vulnerabilities for a wide range of resource categories in the City including the following which are generally summarized below. For additional detailed information on these resource categories, please refer to Chapter 5 of the City's 2019 Final SLRVA.:

#### **PUBLIC BEACHES AND PUBLIC TRUST RESOURCES**

The Public Trust doctrine provides that tide, submerged lands, and other navigable waterways are to be held in trust by the State for the benefit of the people of California. In addition to Public Trust lands (i.e., tidelands and submerged lands, from the shore out three nautical miles) there are at risk resources that include the public beach. San Clemente is known for its world class beaches. Beach width in the City varies spatially and temporally, with narrower beaches typical of the north reach and wider beaches typical of the South Reach. The beaches provide public recreation activities for residents and visitors, as well as protection for the bluffs and railroad behind them. San Clemente City Beach and State Beach have combined annual attendance of 3,103,581 and are responsible for over \$67 million in annual spending and over \$130,000 in annual City tax revenue (OCCRSMP, 2013). SLR will worsen already chronic erosion rates resulting in beach loss throughout San Clemente. With a decreasing natural supply of sediment, the narrow beaches are very sensitive to storms. The effects of storms will increase in magnitude with higher water levels. In the absence of adaptation measures, higher water levels will make sandy beaches more difficult to retain over time, impacting the recreational opportunities available on the dry beach areas (i.e., towel area, fire pits, volleyball courts and amenities). Access to the beach and ocean, including parking, paths, and trails, are also expected to be affected.

#### **BEACH & COASTAL PUBLIC ACCESS POINTS**

There are 19 access points in the City, 15 of which are accessible by public and four of which are private. Access points vary in accessibility and consist of a mix of paved trails, steps on the bluff, railroad over- and under-crossings, and stairs to the beach. The most accessible of these points is the San Clemente Municipal Pier, which allows for semi-paved access directly to the sandy beach and pier. The vulnerability of public access points in the City varies depending on the configuration of the access path and proximity to current and future coastal hazards. Dije Court and Mariposa are most vulnerable due their high exposure to potential erosion where frequent wave uprush against the railroad revetment can inhibit

beach access. Below grade crossings exist at many of the popular beach access points and are often co-located with stormwater outfalls. These access points are more sensitive to SLR because the upward and landward migration of the beach profile could reduce vertical clearance and reduce stormwater conveyance capacity, both of which could inhibit access. Nearly all access points are projected to be vulnerable under the 3.3-and 4.9-foot SLR scenarios in the absence of any City action to enhance resiliency or adapt to SLR. Access stairways or paths located on bluffs could be exposed to erosion under the higher SLR scenarios if the railroad is relocated and no adaptation strategies are implemented to mitigate bluff erosion.

### **CALIFORNIA COASTAL TRAIL**

The California Coastal Trail (CCT) runs approximately 2 miles from North Beach to San Clemente State Beach and is a valued resource for the City and the region. The first 0.8 miles in the northern reach runs along the railroad on the landward side, then crosses to the beach side for the central reach near the Marine Safety Building. It then runs for 0.6 miles along the beach until it crosses the railroad again after T-Street. It then continues along the landward side of LOSSAN for 1 mile, crossing several small access tunnels and stormwater outflows. A portion of the trail along the north reach is shown below. The CCT is part of a Statewide CCT network and a high City and CCC priority for implementation and protection. The first portion of the coastal trail to be affected is in the north reach where erosion and flooding could extend beyond the railroad to the trail via the culvert near W. El Portal Avenue. This location may be subject to storm exposure at +0.8 feet of SLR and exposure to (non-storm) wave erosion around +1.5 feet of SLR according to CoSMoS shoreline projections. Maintaining continuity of the coastal trail will become increasingly difficult in the long-term as trails on the beach side (Central Reach) will be exposed to direct wave action seasonally or year-round. Relocation may be difficult due to physical space limitations, private land ownership, public easements/infrastructure and the LOSSAN right-of-way which that protects the CCT.

### **PUBLIC RESTROOMS AND PICNIC FACILITIES AND RELATED CONCESSIONS**

There are five locations of restrooms on the beach in the City: North Beach, near Linda Lane Crossing, south of the Pier, T-street, and Boca del Canon. Additionally, there are picnic facilities on each side of the Pier and at T-Street. These facilities range in date of construction and are built on sand foundations. The T-Street and Boca del Canon restrooms were recently renovated within the last few years, and renovations to the North Beach and Linda Lane crossing restrooms were just completed. The North Beach restroom's history of damage is an example of the kind of exposure expected for restroom facilities exposed to potential hazards with SLR. The North Beach restroom is currently exposed to storm related erosion, with the Linda Lane restroom exposed with 0.8 feet of SLR. Erosion near or underneath the bathrooms could impact public safety and access for visitors. All restroom locations are vulnerable under the 3.3-foot SLR scenario.

### **SAN CLEMENTE MARINE SAFETY DIVISION HEADQUARTERS AND RELATED FACILITIES**

The Marine Safety Division Headquarters was originally built in 1968 and is an iconic coastal structure for the City. The San Clemente Marine Safety Division Headquarters is approximately 5,000 square feet in size and stores equipment for beach maintenance. The structure has suffered damage from El Niño storms due to wave attack and erosion beneath the piles. The City completed repairs to this existing structure in 2020 to enhance the facility's existing shoreline protection system. The Marine Safety building is at risk to erosion, wave run up, and overtopping during large storms. Even small amounts of SLR will subject the building to more frequent storm damages from moderate to extreme storm events. During winter storms the parking lot and amenities closest to the shore may be at risk at +0.8 feet of

SLR. In 2021, the City initiated efforts to evaluate the feasibility of keeping the structure in the current same location as well as identifying several potential alternative locations for this critical public facility. The City's draft facility relocation study is anticipated to be completed in early 2023.

Below are some potential impacts to Marine Safety operations that may need to be addressed in the future due to the sea level rise concerns:

- Relocating lifeguard headquarters may be necessary depending on the level of SLR. The City's priority would be to keep Marine Safety Headquarters on the west side of the railroad tracks and redesigning and relocating the building towards the back parking lot. Other options for locations may need to be considered.
- Consideration of designing a first aid room/office below the pier tower may be necessary if the Marine Safety Headquarters is relocated east of the railroad tracks.
- Emergency response vehicles responding on the beach could potentially be limited due to the sea level rise. Consideration of utilizing a rescue boat and/or purchasing a second personal watercraft (PWC) may be necessary for emergency water response versus beach response. Staffing the rescue boat or PWC's on a daily basis during the busy season may be necessary.
- Emergency vehicles responding to emergencies on beach would be limited. Certain areas of City beach may require emergency vehicles to respond via streets to beach and water related emergencies. Consideration to purchase a four-passenger emergency response command vehicle (that seats four passengers) may be necessary. A command vehicle would provide transportation mode that would accommodate multiple lifeguards to respond and carry all necessary equipment to an emergency.
- Alternative communications system with beach towers needs to be considered. Hard line phone lines are currently used for tower phones that are buried in the sand. Consideration of wireless phone system for beach tower communication systems may be necessary.
- Consideration of looking into smaller designed beach towers that could be relocated more easily than the current beach towers. Some of the beach towers may need to be relocated off the beach depending on sand supplies and levels of SLR. Consideration should be made to look at designing and potentially replacing some beach towers in the rip rap that separates the railroad tracks from the beach.
- Junior Lifeguard program that enrolls over 800 participants each summer may need to be restructured if the City's Marine Safety Headquarters is relocated off the beach and the beaches continue to erode.

#### **CITY OF SAN CLEMENTE MUNICIPAL PIER**

The San Clemente Municipal Pier is an iconic structure in the City and region for visitors and residents. In 2016, the second largest employer in the City was Fisherman's Restaurant, located on the San Clemente Pier and employs 260 people (City of San Clemente, 2016). The Municipal Pier underwent a \$2.9 million refurbishment in 2010. Businesses currently operating on the Pier include Fisherman's Bar & Restaurant, and San Clemente Pier Grill and Tackle. A non-profit group, "San Clemente Pier Pride" works in partnership with the City and community stakeholders to fill the gaps between city funds and the Pier's needs in order to restore the Pier to the best version of its historic self. PierPride is dedicated to helping preserve the historic San Clemente pier, the heart of the city since 1928. Beach loss due to SLR is predicted to be greatest around the Pier. Loss of sediment, a steepening of the shoreline, and higher water levels could expose the pier deck to damage during winter storms, as wave crests could reach the underside of the main deck. A more detailed analysis is needed to assess the potential damage to the

timber pier segments that have a lower deck elevation than the outer Pier segment. Increased maintenance or retrofitting of the pier could be required to maintain safety and/or function. In a +3.3-foot SLR scenario, the beach could erode entirely past the base of the pier towards the pedestrian tunnel under the railroad. This access tunnel sits at around +2.75 feet MLLW (mean lower low water) and could experience flooding and damage during high tides. Erosion could also undermine the nearby pavement and structures. Under +4.9 feet, these hazards would intensify, and shoreline migration could expose the landward side of the railroad to erosion.

### **HISTORIC AND CULTURAL RESOURCES**

Casa Romantica is a bluff top nationally registered historic building (designated in 1991) located adjacent to Parque del Mar. It is owned by the City and operated by Casa Romantica Center and Gardens, a non-profit 501(c)3. It serves as the main cultural institution of the City and is open to the public. Ole Hanson Beach Club is a nationally registered historic building built in 1928 and designated in 1981. San Clemente is within the historical territory of the Juaneño (Acjachemen) Tribe of American Indians. The group is known to have had coastal settlements in the area, although the majority of the bluff tops within the coastal zone are already developed. Recent projects such as the Marblehead development have gone through archeological surveying with no findings of archeological artifacts in the development site. There are four recorded archaeological sites near the coast. If the railroad were to be relocated, the bluffs of Casa Romantica could be exposed to erosion under a +4.9-foot SLR scenario, posing potential risk to structural damage and erosion of garden space. The Ole Hanson Beach Club sits inland of the North Beach parking lot. While the lower range of SLR conditions (i.e., +0.5 to 3.3 feet) pose low potential exposure, +4.9 feet of SLR in the CoSMoS model predicts coastal erosion up to the seaward edge of the Ole Hanson Beach Club site in the event the LOSSAN railroad is removed.

### **SURFING**

San Clemente is known worldwide as a cultural hub for surfing. People of all ages participate in the sport in San Clemente recreationally and professionally. The City has multiple breaks along the coast including the famous T-Street Beach located immediately south of the Pier. Regardless of future adaptation strategies, SLR will shift the tide range and beach profile, altering the wave breaking patterns over the T-Street reef. While beach loss at T-street Street could be less than other areas, according to the CoSMoS shoreline projections, a landward and upward shift of the beach profile in combination with higher water levels will alter the surf conditions at T-Street and other surf locations. Depending on the sediment source supply and sandbar formation, the waves may focus on a different part of the T-Street reef (likely closer to shore) with the outer reef becoming more sensitive to the tide.

### **CRITICAL PUBLIC INFRASTRUCTURE, PUBLIC FACILITIES AND PUBLIC UTILITIES**

City-and County-operated infrastructure includes various stormwater inlets, outfalls, headwalls, potable water supply/conveyance lines, recycled water facilities (lines and pump stations), and gravity wastewater mains, as well as electrical infrastructure supplying the pier and other coastal facilities along the public beach. Stormwater outfalls could see increased sand deposition, lowering capacity and potential increased exposure to undermining from higher shoreline erosion rates. Water mains, which run parallel to the beach, such as the recycled water main adjacent to the Marine Safety Building, could experience damage from shoreline erosion at around 3.3 feet of SLR. Additionally, gravity mains, which lie on the landward side of the railroad, face flooding during high tide events and storms, presenting exposure to the less protected landward side of the railroad. The Beach Trunk Sewer Line and associated pump stations will necessitate redesign to convey raw wastewater through a series of new pump stations and pipelines to redirect raw wastewater inland at a significant cost.

## LOSSAN RAIL CORRIDOR

The LOSSAN Rail Corridor follows an alignment along the toe of the coastal bluff and is protected by a revetment in many locations. Coastal hazards and the effects of SLR on coastal assets in the City will largely depend on the condition of the revetment lining of the railroad corridor in the future. The railroad sits at elevations ranging from 20-25 feet (as measured in the North American Vertical Datum of 1988 or NAVD 88) (e.g., 17.5 to 22.5 feet above mean sea level). At this elevation, the tracks are not exposed to long-duration flooding but are within the wave run up and overtopping zone. The lowest points are located at the San Clemente Station, the Pier, and San Clemente State Beach and the highest are when the railroad lies closest to the bluff in the north and southern portions of the City.

Within the City, the Northern reach of the corridor is highly exposed to future SLR. At present, this segment of railroad is protected by a revetment that experiences direct wave action year-round and erosion of the backside via an opening at the W. Portal access point. The railroad itself would experience more frequent flooding and potential for damage during large wave events due to SLR. Modest amounts of SLR would be anticipated to increase the frequency of overtopping and flooding. SLR related vulnerabilities along the LOSSAN corridor are the subject of the OCTA *"Rail Infrastructure Study"* that was completed in January 2021. The OCTA study identified implementation strategies to reduce the risk to rail infrastructure from mudslides, flooding, severe storm/weather events, coastal surge, and SLR. The final OCTA report established a plan for OCTA to respond to and prepare for future climate-related risk. The recommendations indicate which strategies should be prioritized in the near-term to mitigate climate risks and which strategies can be implemented in the long-term to further strengthen the resilience of the rail system.

Much of the potential for damage is first focused on the W. Portal Stormwater Culvert, which allows further erosion landward of the railroad. Similarly, further south at the narrowest stretch, where the coastal trail is already elevated, erosion and wave attack against the revetment and railroad is predicted to be severe for SLR greater than 3.3 feet. The San Clemente rail station could see exposure to erosion and flooding from the limited capacity to the North Beach storm drain channel during winter storm events. If left in place at the current elevation, the railroad would likely be inoperable due to frequent flooding and erosion damage under a +4.9-foot SLR scenario unless it was protected from erosion and flooding by an engineered seawall or revetment.

Along the Central Reach within the City the railroad is not protected by a revetment in places, rather a sandy beach protects it. Under a +3.3-foot SLR condition, beach loss could extend into and at points past the rail corridor. In the CoSMoS model, beach erosion could reach the rail corridor as soon as +2.5 feet of SLR. Without protection, shoreline erosion would threaten to undermine the railroad. While the southern reaches of the railroad are protected by a revetment, shoreline migration could leave the revetment exposed to direct wave attacks starting at Calafia Beach and Boca Del Canon as soon as +1.6 to 2.5 feet of SLR with potentially the entire revetment exposed at +3.3 feet of SLR. The southern portion could see the same potential damage and erosion dynamics similar to the rest of the railroad in the other reaches. The ability of the existing revetment to withstand these erosive forces was evaluated by the Orange County Transportation Authority (OCTA) entitled the *"Rail Infrastructure Study"* as part of their SLR vulnerability assessment completed in January 2021.

## EXISTING STRUCTURES, BLUFFTOP DEVELOPMENT AND CRITICAL PUBLIC INFRASTRUCTURE

The San Clemente coastline above the beach is extensively developed with residential and commercial developments as well as infrastructure such as public roads and utilities. The remaining portion is primarily comprised of Calafia State Park and San Clemente State Beach's bluff top camping and

recreation area. If the railroad were to be relocated and the revetment removed, the bluffs underlying coastline development would be subject to coastal erosion under SLR scenarios higher than 3 feet. Limited bluff top areas would be at risk at +3.3 feet of SLR, primarily due to intensified erosion during storm events. Significant impacts across the full extent of the coastline would be expected at +4.9 feet of SLR. Sustained erosion due to wave action at the base of bluffs would induce slope failure up the bluff face, eventually causing erosion of the bluff top and potentially undermining the foundations of existing development. Bluff erosion, therefore, presents a considerable threat to the safety of any development situated on the bluff if the railroad and revetment are removed from their existing location. In 2021, OCTA determined in their sea level rise study that their preferred coastal resiliency strategy is to maintain the existing structure/infrastructure in place.

### **TRANSPORTATION INFRASTRUCTURE AND PUBLIC ROADWAYS**

Much of the City's transportation infrastructure is at elevations high enough to be considered a low concern with respect to future SLR. Most roads in the City (except those noted below) are above an elevation of ~25 feet NAVD88 and setback from the potential SLR affected areas and, therefore as such, are a low concern for SLR impacts. The lower lying roads are found at El Camino Real in the North Reach, in the San Clemente Pier Bowl area, Boca del Canon, and near Calafia State Park. This section includes traffic signals or electric infrastructure associated with the City's road network. No current bike infrastructure (including bike lanes) is within the exposed areas in the range of SLR evaluated by the SLRVA. Low lying, coastal roads such as El Camino Real, Avenida Victoria, Boca del Canon (private), Plaza A La Playa, and Avenida Calafia could be exposed to shoreline migration in the case of a relocated railroad and SLR greater than 4.9 feet. Damage to these roads presents access and safety concerns. Additionally, bus stops on the OCTA 1 and 90 lines would be at risk and are one of the central lines providing access to the San Clemente Metrolink Station and beaches. The City's North Beach parking lot sits lower than the railroad by 1-4 feet, which leaves it exposed to flooding during large storm events in a +3.3 feet SLR condition. If the railroad and revetment are removed in the future, the exposure of this parking lot would be expected. El Camino Real, along the North Reach study area, is one of the lowest lying (20-23 feet NAVD88) roads in the City. According to CoSMoS erosion projections, the road is not exposed to shoreline erosion for the scenarios evaluated. Exposure to erosion or flooding for higher SLR increments would depend on how development seaward of the road (LOSSAN railroad and Shorecliffs Beach Club) adapts to future coastal hazards.

### **ENVIRONMENTAL RESOURCES/ENVIRONMENTALLY SENSITIVE HABITAT AREAS (ESHA)**

San Clemente's shoreline is predominately sandy beaches bordered by the railroad corridor and coastal bluffs, with sparse rocky outcroppings offshore. Subtidal habitats include the federally designated Habitat Areas of Particular Concern, canopy kelp beds and rocky reefs, as well as soft-bottomed reefs, and surfgrass beds. Offshore resources are beyond the jurisdiction of the City and beyond its management capabilities to plan for. Above the beach, coastal scrub and developed land dominate, with coastal dunes present in the southern reaches of the City. Stands of eucalyptus trees along and within Calafia Canyon constitute monarch butterfly ESHA. Sensitive biological resources are found in the City, which can be potentially affected by SLR, including subtidal, intertidal, and bluff habitats. Any resiliency planning measure would be required to evaluate the potential for effects on these resources as well as and consider what would occur in a no-action scenario.

### **SCENIC RESOURCES**

The City has identified several scenic vistas and view corridors in its Centennial General Plan and LCP, which center on North Beach and the Pier Bowl area. These public view corridors center on the City's



coastal canyons and beach areas. Loss of sandy beach due to erosion could affect the aesthetic quality of San Clemente's beaches. Views of the ocean and areas further offshore would not be expected to be impacted by SLR.

### **SALTWATER INTRUSION**

As SLR occurs, the fresh-salt groundwater interface is pushed upwards. Over-pumping of groundwater can amplify this effect by pulling seawater inland. The City has experienced some salinity issues in its groundwater in the past, including a groundwater well for public use, which was no longer used after 1958 due to seawater intrusions. The City's Urban Water Management Plan notes that as of 2015, one of two wells in the City (well No. 8, located inland of the Coastal Zone and near Vista Bahia Park) appears to display initial stages of saltwater intrusion. According to the San Clemente 2015 Urban Water Management Plan (UWMP), the City's main source of water supply is imported water from Metropolitan Water District of Southern California. Imported water is supplemented by local groundwater extracted from City-owned wells. Recycled water produced at the City's recycled water treatment facility. Groundwater accounts for less than 10% of the City's water supply. In the future, the water supply is expected to shift to more recycled water use as a result of the City's recycled water treatment facility expansion.

### **SOCIOECONOMIC IMPACTS AND ENVIRONMENTAL JUSTICE**

The beaches of San Clemente provide significant tax revenue for the City and County. Due to a narrow coastal typology, beach loss becomes a direct threat to these major economic drivers. Residents, and non-residents such as workers and tourists whose work or visit is related to industries such as hospitality, food services, retail, and others dependent on San Clemente's 3 million annual beach attendance could be economically vulnerable with rising seas. For example, in 2016 the second largest employer in the City was Fisherman's Restaurant, which is located on the Pier, employing 260 people (City of San Clemente, 2016). The 2018 OPC SLR report defines "environmental justice" as follows: The structures, policies, practices, and norms resulting in differential access to the goods, services, and opportunities of society by "race." It is normative, sometimes legalized, and often manifests as inherited disadvantage. Examples include differential access to quality education, sound housing, gainful employment, appropriate medical facilities, and a clean environment.

The CCC adopted an "Environmental Justice Policy" on March 8, 2019 which encourages the prioritization of actions that promote equity, foster community resilience, and protect the most vulnerable and to explicitly include communities that are disproportionately vulnerable to climate impacts in adaptation planning. Unlike in low-lying cities where SLR typically threatens homeowners to flooding, SLR in San Clemente first threatens the public resource of the sandy beach. The recreational, habitat, and coastal access benefits provided by the sandy beach will be most vulnerable to SLR. Depending on management and adaptation strategies, the erosion of bluffs could put property owners and renters at risk to structural hazards.

SLR may require the City to acquire new access points, parks, or easements in the case of erosion. Additionally, the LOSSAN rail corridor presents trade-offs between regional and local environmental impacts. The corridor's position along the beach has impacts on current and future coastal dynamics in the City, while also having a large regional importance by connecting the larger Southern California metropolitan areas. Continued coordination with OCTA and other stakeholders and further analysis of local and regional costs, benefits, and trade-offs is expected to help inform the coastal resiliency planning process. None of the affordable housing properties in the City are directly threatened by erosion due to SLR, although the larger economic impacts of different adaptation or management scenarios could be considered to assess the impact to socioeconomically vulnerable populations.

## Chapter 5: Sea Level Rise Monitoring and Resiliency Project Phasing

The Coastal Resiliency Plan calls for the implementation of resiliency building and adaptation measures to limit or reduce risks and exposure to SLR hazards over time. The Plan describes conceptual planning-level measures that can be implemented to reduce risks before an acceptable level of risk is exceeded. The City will need to monitor and evaluate the trajectory towards the implementation timelines of SLR and coastal hazards to track whether and when to begin implementing additional coastal resiliency plans and programs beyond those currently in place and those already being pursued.

The Coastal Resiliency Plan recommended monitoring effort is summarized below.

- **Amount of sea level rise** (e.g., 0.8 feet, 3.3 feet, and 4.9 feet of sea level rise). Certain adaptation measures will be implemented when sea level rise has risen by a certain amount. King Tides are considered a preview of what rising seas will look like in the City on a more sustained basis. To monitor SLR and progress towards certain amounts of SLR, the City will follow SLR reports from the State and Scripps Institution of Oceanography (SIO) and SLR data from the NOAA tide gage at Scripps Pier at La Jolla Shores and Los Angeles Outer Harbor, which are updated annually and which have published corrections for San Clemente. Sea level is inherently variable in response to predictable astronomical tides and less-predictable atmospheric events such as El Nino and individual storms; however, given that extreme flooding occurs infrequently, SLR may occur without any concomitant extreme flooding. Tracking SLR, therefore, allows the City to anticipate and act in advance of the effects of SLR.
- **Flooding and storm damage frequency.** In addition to the amount of sea level rise, the frequency or risk of flooding and storm damage can be used as a data point that signals the need to implement actions in the Coastal Resiliency Plan. To monitor the frequency of flooding and storm damage, the City will track and keep records of coastal and inland/upland flooding and storm damage events and information. This could be a collaborative effort between City staff and residents in which reports, pictures, and videos are collected. The date, type, location, and severity of flooding (e.g., depth, duration, wave height), and damages can be collated into a file. The intent will be to track the frequency, extent, and severity of flooding to assess if and how the frequency of flooding is increasing. If significant and/or extreme flood events occur, then storm data (e.g., water levels and, wave conditions) can be collected, and storm frequencies can be recalculated to quantify the increase in flood risk for comparison against risk-based implementation timelines or horizons.
- **Beach profile monitoring.** Given that a guiding principle is to maintain a walkable beach, beach width is used as a proxy for considering when beach adaptation measures need to be implemented. Specific beach widths need to be further detailed as part of subsequent analyses. The Plan recommends that the City re-establish its beach profile surveys to monitor beach width, tracking changes in profile slope and width at set transects over time. The USACE proposes to collect some of this data; however, it is largely limited to the areas where the beach sand project would be located and would exclude areas to the north and the south and would not be a long term program. For a truly comprehensive and useful data set, additional monitoring efforts are recommended in the near term so that the City can establish a baseline against which future SLR and beach erosion trends can be tracked.

The City may want to consider preparation of a brief SLR Shoreline Monitoring Report on a regular cycle (e.g., every five/ten years) and/or when significant changes occur or progress towards an implementation

effort are enacted. The City may conduct this process in consultation with technical experts and with opportunities for public input and review. The City will also participate in regional efforts, to monitor and track SLR and related effects in the region, littoral cell, and/or watershed.

The Coastal Resiliency Plan identifies measures at a conceptual planning-level of detail and discusses the potential benefits and effects of the measures. Additional detailed project-level planning and design will be required to implement the projects. For measures involving construction, project-level planning and design would include:

- » Feasibility study, including technical analyses, development and assessment of project alternatives, conceptual/ preliminary engineering design, and cost benefit analysis
- » CEQA, and possibly NEPA, environmental review and regulatory permitting
- » Identification of a funding source(s)
- » Final engineering design
- » Construction
- » Post construction monitoring

The lead times required for performing project-level planning, securing funding, and implementing or constructing a resiliency measure will vary. The Coastal Resiliency Plan approximates lead times to allow for the City to begin planning in anticipation of when additional measures would be required to be in place to limit risk and exposure within the City.

## Chapter 6: Resiliency Building and Planning Principles

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The Coastal Resiliency Plan identifies high-priority, near-term adaptation measures and includes the following components to address specific areas, vulnerabilities, and risks. Resiliency planning involves a range of policies, funding mechanisms, and engineered projects that can be implemented in advance of or reactively to potential impacts depending on the degree of preparedness and the willingness to tolerate SLR-related risk. Since SLR resiliency planning is anticipated to require significant multi-jurisdictional coordination and funding, advanced planning is essential. Developing a range of options, or a “toolbox,” provides local and regional entities with flexibility to choose from an array of short-and long-term strategies to integrate into their planning processes.

Given the uncertainty in timing and severity of impacts, it is important to identify events or SLR thresholds that, once reached, indicate that certain adaptation strategies have run their course, and planning for new adaptation strategies is needed. For example, thresholds related to the extent of flooding or frequency of damages might be used to initiate implementation of a specific engineered project.

Note that for all the strategies in this toolbox, project level analyses and approvals evaluating strategies' effectiveness, as well as environmental, economic, and social impacts, will be required.

High-priority SLR adaptation measures/projects for the City to begin planning for and implementing now as part of the City's CIP Program include those focused on evaluating, monitoring and reducing risks to critical public infrastructure and facilities, including the City's existing Marine Safety Division Headquarters, Municipal Pier, roads, sewer infrastructure, storm drainage system, and other essential public infrastructure and public structures.

### Planning Principles

An objective of the City is to protect the community, public beach and other natural resources that make San Clemente a desirable location to live, work, recreate, and visit. The City's public beach and shoreline are a significant source of the community's quality of life and generate revenue from both community and visitor-recreational activities. Ensuring the City's beaches and shoreline are resilient to SLR over time is integral to the City's community character, healthful livability, and economic viability.

Through the LCP Update and the SLRVA public outreach process, the City and its residents have identified several priorities to accomplish or balance when planning for adaptation to identified coastal vulnerabilities. Above all, the City and its residents choose to prioritize the following:

- › Maintaining the City's small beach town character and high quality of life;
- › Maintaining a wide sandy beach offering lateral beach access and a variety of recreational opportunities, such as surfing, paddle boarding, swimming, fishing, and other recreational activities for residents and visitors;
- › Maintaining a healthy economy with opportunities for future economic viability;
- › Protecting or adapting vulnerable neighborhoods, including the Pier Bowl area of the City;
- › Identifying sustainable funding sources to allow the City to improve coastal resiliency; and,
- › Improving regional collaboration and coordination with agencies to maintain, enhance, and protect key resources and critical infrastructure.

Many of the strategies are focused on resiliency measures which balance the City's priorities for adaptation and promote the long-term preservation of the public beach, visitor serving facilities, public infrastructure, and private property. To achieve this balance, it is important to weigh considerations and achieve consistency with adopted policies and guidance. Guiding goals, principles, policies, and programs that have been considered in the development of policies for addressing rising seas within the City include those of the state's climate adaptation strategy – the *Safeguarding California Plan Update* (California Natural Resources Agency 2018), *Sea-Level Rise Policy Guidance* (CCC 2018a), the City's Certified LUP (2018), and the California Coastal Act.

With applicable State guidance and local City priorities in mind, the following planning principles can be used to guide resiliency planning efforts:

- Prioritize regional collaboration and coordination in planning for SLR;
- Implement a phased adaptation approach based on tide gauge monitoring and SLR thresholds
- Protect or assist populations vulnerable to coastal hazards;
- Reduce risk of extreme coastal hazards and damage upon critical infrastructure and structures in high-risk areas of the City;
- Maintain flexibility to meet changing conditions;
- Balance approaches to adaptation weighing benefits to costs and ensuring any action selected has a net benefit to cost ratio that is  $> 1.0$ ;
- Maintain natural defenses (e.g., wide sandy beach, hybrid solutions, living shoreline/sand dunes, native bluff vegetation that are nature based adaptation strategies);
- Consider pilot projects that emphasize and prioritize nature-based solutions designed to minimize maintenance over time;
- Require new development to plan for coastal storm and SLR hazards;
- Develop adaptive measures that are consistent with the LCP; and,
- Conserve, maintain, and, when necessary, restore/enhance beaches and public access for the future.

## Chapter 7: Priority Measures for Resources and Assets

This section provides a road map for long-term, phased adaptation planning, including identification of both programmatic measures and projects intended to reduce damage to the City from coastal hazards, timing for initiation or implementation of such measures, areas of future study, financing options, and the next steps for the City to further its adaptation planning efforts. It is also intended to assist the City and decision-makers in making informed decisions regarding future land use and development. While the City has a long history of proactively addressing coastal hazards, this is the first focused endeavor by the City to identify possible vulnerabilities to climate-related impacts such as sea level rise. Priority adaptation strategies have been integrated into the recently completed LCP Update (2018) and will be integrated into the City's in-progress LCP Implementation Plan, and other actions.

The City's resiliency planning approach allows flexibility to choose from an array of adaptation strategies over time. The City may choose to implement a hybrid adaptation approach using soft and nature-based protection measures and accommodation concepts based on potential SLR thresholds and monitoring. Planning for these priority measures is anticipated to require significant regional or multi-jurisdictional coordination and funding. Many adaptation strategies take substantial time to implement. As a result, advanced planning and securing financing is vital.

The SLRVA identified the potential for physical impacts on coastal resources as a means to begin the process of improving coastal resiliency in the City over the long-term by developing a plan of action and path forward. Resiliency comes from increasing an asset's adaptive capacity by reducing vulnerability to hazards (i.e., protection). Some of the resources identified in this study have reduced vulnerability to hazards such as bluff erosion because of protections that are in place like the LOSSAN railroad and revetment/seawall which OCTA has recently indicated will remain in place for the foreseeable future.

### Existing and Ongoing Coastal Resiliency Programs

This section of the Plan outlines ongoing programs and adaptation strategies that the City has already engaged in and continues to pursue to promote long-term coastal resiliency. San Clemente's approach to adaptation is comprised of many subcomponents all designed to work together. The City's commitment is, for the long term, to maintain a popular public beach heavily used by visitors and the City's residents. There are more than 15 public beach access points in the City, and the beaches offer a wide variety of recreational experiences ranging from surfing and swimming to volleyball, fishing, and other recreational activities.

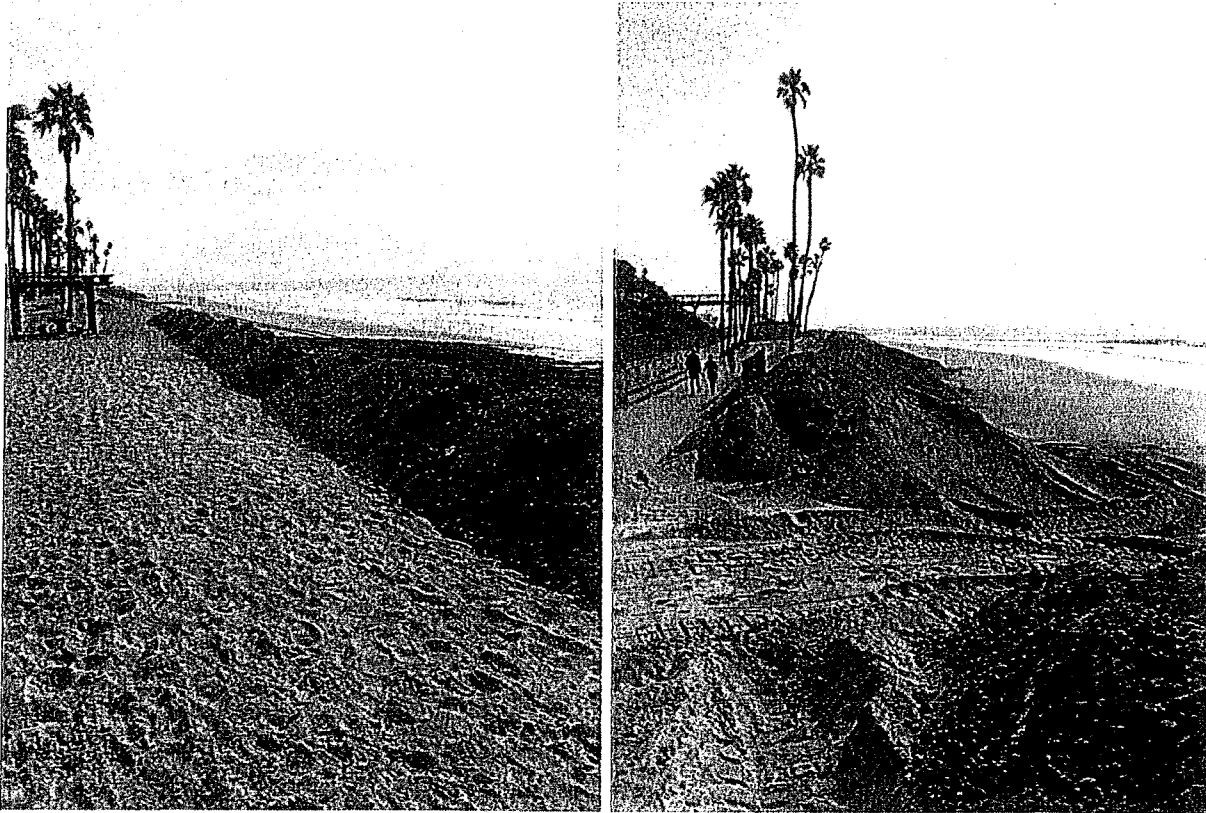
At this time, the City's favored approach is to pursue a combination of beach nourishment, sand retention/management, and flood management projects to maintain the existing high-quality public beach and public access in San Clemente as the primary means of addressing sea-level rise.

San Clemente's strategy is based on sound scientific and engineering principles, which have been extensively reviewed. The strategy accounts for community input and recognizes that the beach is a public asset of importance beyond San Clemente. The City believes the strategy will be successful, is "feasible" within the meaning of the State law and will best meet both public and private goals for a significant period of time. In accordance with the California Coastal Act section 18.04.010 and Public Resources Code sections 21061.1 and 30108, the term "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

At the center of these ongoing efforts are the City's Winter Storm Berm Program and the U.S. Army Corps of Engineers (USACE) Coastal Storm Damage Reduction Project described in more detail below.

### San Clemente Winter Storm Berm Program

The City implements an annual Winter Storm Berm Program to protect the City's shoreline from wave action and related flooding during the winter storm season. The following photos were taken in November 2021 and depict the winter storm berm in place on the City's beach.



The sand berm is typically constructed in late November and remains in place until approximately early March the following year based on storm predictions, tides, and beach conditions. The City has an existing program where sand is pushed from the intertidal zone up onto the back beach. The City monitors tides and selects a very low tide, then moves that sand up to the back of the beach. Generally, the first time this is done each year is late fall before the winter storm season, and then again in late winter. The first event is to pile up sand to help resist storm waves, and the second event attempts to restore beach area for the summer season. The winter storm berm is created in the area that generally runs from Linda Lane to south T-street and is approximately 2,500 feet in length. Funded by the City, this ongoing measure reduces the probability of damage to development and infrastructure.

Historically, large waves generated by Pacific Ocean storms during the winter have caused damage to local beaches and coastal structures. Existing vulnerable buildings include the City's Marine Safety Headquarters as well as public parking and restroom facilities and all other structures located on the beach. To protect these structures and public infrastructure, every winter the City constructs a seasonal sand berm.

Table 7-1. Ongoing Resiliency Strategy-Winter Storm Berm Program

Adaptation Strategy	Winter Storm Berm Program		
Implementation Timeline	Ongoing annually	Berm Construction: 1 week annually	Beach Restoration (i.e., Berm Removal): 1 week annually
Year Initiated	On-going since the 1970's		
Resource / Asset Benefits	Protection of roadways and infrastructure Protection of up to existing public structures and the public beach Protection of recreation resources (beach, public parking, and restrooms) Retain the Citywide economic benefits of beach recreation for the period during which the berm program is effective Can refortify in emergency storm situations		
Costs & Impacts	Annual construction, maintenance, and restoration costs Less effective over time with increasing rates of SLR, particularly over 2 feet, at which coastal storms may overtop the berm or result in severe beach erosion		
Permitting & Coordinating Agencies	USACE, Regional Water Quality Control Board, State Lands Commission		
Next Steps	Continue to implement the Winter Storm Berm Program in the near-term until such time as the berm is no longer effective (i.e., continual flooding and overtopping above the typical berm height), or increase berm height or until another adaptation measure replaces the need to implement this program (e.g., USACE project or living shoreline)		

The costs of installation, maintenance, and removal of the berm are borne by the City. Depending on environmental conditions, the approximate cost of annual berm construction, maintenance, and removal is \$28,000.

This berm is not intended to serve as a substitute for private storm protection improvements or flood insurance but can substantially reduce damage. Additionally, with sufficient preparation the City can rebuild and support the existing temporary berm after it experiences large storm events. However, storms can exceed the protection offered by the berm, and the berm is not impervious to being destroyed itself. Though beach front property damage by winter storms with installation of the berm has not been recorded along the City coastline in the past, the possibility remains present even with installation of the berm due to the variability of storms that can occur and as well as potential flooding, wave-attack, and erosion that could also occur over time when combined with SLR.

### USACE Coastal Storm Damage Reduction Project

The Reconnaissance phase of this project was initiated on March 28, 2000 under the authority of Section 208 of the Flood Control Act of 1965. The Reconnaissance study resulted in the finding that there was a Federal interest in continuing into the Feasibility phase. The City of San Clemente, the non-Federal sponsor, and the U.S. Army Corps of Engineers (USACE) initiated the Feasibility phase in September 2001 and completed it in February 2012. The City completed the pre-construction monitoring component of the Preconstruction Engineering Design (PED) phase of the project in 2021 and is seeking construction funding (State and Federal) to implement the project.

The USACE Coastal Storm Damage Reduction project, also known as the San Clemente Shoreline project, is designed to nourish an estimated length of 3,412 feet of shoreline at a 50-foot width. The beach-compatible sand needed for the nourishment will be taken from a designated borrow site located offshore of Oceanside, CA, which that will be hauled 18.6 miles to San Clemente and placed by hopper



dredge on the beach. The southern limit of the proposed beach fill is located immediately south of the T-Street overpass and the northern limit immediately north of the Marine Safety Headquarters. A taper would continue an additional 330 feet to the north and south to merge with the existing shoreline. Re-nourishment cycles would be performed approximately every 5-10 years.

The San Clemente Shoreline project initiated as a feasibility study in September 2001 with the purpose to identify a technically feasible and economically beneficial "recommended plan" for reducing damages from storm-induced wave attack, which are expected to increase, in the future, as a result of chronic, long-term shoreline erosion. Of great risk is the Los Angeles to San Diego (LOSSAN) rail line, which runs the entire length of the San Clemente shoreline. This commuter rail corridor is among the busiest in the country and separates the beach from the bluff. In some areas it is only protected by unimproved ballast, therefore, the rail corridor is vulnerable to storm-induced damages.

The study area was divided into ten reaches based on locations of developments and the condition of the revetment that runs along various stretches of the railroad tracks. After analysis of each section, it was determined that Reach 6 had the potential to justify the purpose of the study. Reach 6 extends from Paseo de Cristobal to Linda Lane in the City and contains narrow beaches ranging from 0 to 128 feet in width. In addition to the railroad and high coastal bluffs, Reach 6 contains both the San Clemente Pier and the "T-Street Reef" and its beaches backed by park facilities. The "T-Street" region of the shoreline is a very popular surfing site located immediately south of the San Clemente Pier, offshore of the T-Street overpass. The T-Street surf break is due to a permanent, hard-bottom reef that rises above the seabed.

Since the 1990's, the project area has experienced chronic, mild, and long-term erosion. Shoreline erosion is a result of the decrease of fluvial sand supply resulting from the concreting of creeks and rivers, upstream dams, and urban development. Continued future shoreline erosion is expected to result in storm waves breaking directly upon the railroad ballast, which significantly threatens the operation of the rail corridor. Additionally, continued future shoreline erosion will subject public facilities to storm wave-induced damages. For example, the 1983 El Nino storm season resulted in an estimated damage of \$3,277,000. These facilities, maintained by the City of San Clemente, include the Marine Safety Building, public restroom facilities located on the beach, lifeguard stations, parking areas, and paving near the Pier and the Municipal Pier itself. The LOSSAN railroad line has experienced railway traffic service delays as a result of the narrowing shorelines. These delays occur when storm wave run-up exceeds the elevation or the crest of the railroad ballast in absence of revetment protection.

The majority of the damages/costs identified in the study are related to LOSSAN railroad protection/construction and operation & maintenance costs. During plan formulation, the USACE narrowed down a final array of alternatives for economic modeling and environmental analysis under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). A broad set of project alternatives was initially considered including the following:

- No Action Alternative;
- Managed Retreat;
- Beach Nourishment;
- Revetment;
- Seawall;
- Groins;
- Visible Offshore Breakwater; and,
- Submerged Reef.

**Table 7-2. Ongoing Resiliency Strategy – USACE Project**

Resiliency Strategy	USACE Coastal Storm Damage Reduction Project (50 Year Project)		
Implementation Timeline (Initiated in 2000. PED was completed in 2021. Construction could begin as early as 2022.)	PED Phase Completion: 2 years	Permitting and Planning for Identified Project: Complete	Construction/Installation of Identified Project: 2 years then renourishment every 5-10 years for an initial authorization period of 50 years.
Year Initiated	2000; Due to loss of sediment from San Juan Creek, the major source of beach sediments for San Clemente (Oceanside Littoral Cell). Downcoast erosion and loss of sediment supply has occurred.		
Potential Resource / Asset Benefits	State and Federally funded Reconnaissance, Feasibility, and PED Phases that will provide additional information about coastal erosion and potential solutions. In-depth economic, environmental, and logistical analysis of potential erosion mitigation alternatives completed Source of federal funding for 65 percent of identified project cost Potential integration with existing and proposed adaptation measures (e.g., annual winter berm, living shoreline) Provision of benefits to City's shoreline, assets, and infrastructure north and south of the project area		
Costs & Impacts	Requires local funding for 35 percent of PED Phase and Initial Beach Sand Placement efforts. Re-nourishment cycle cost share requirements are 50/50 Federal and State/Local. State Parks, Division of Boating and Waterways pays 85% of the local cost share requirement and has done so for the Feasibility Phase and PED Phase. Construction Grant funding has also been awarded from the State Parks, Public Beach Restoration Program Grant Funding. Dependent on continued federal and state funding availability.		
Permitting & Coordinating Agencies	USACE, USFWS, NOAA/NMFS, CCC, CLSC, CDFW, RWQCB		
Next Steps	Continue to maintain regular and ongoing coordination with USACE to initiate construction including data sharing from the City's Sea Level Rise Vulnerability Assessment and Coastal Resiliency Plan findings and recommendations. Identify funding sources for local cost share (15% of the local 35% cost share) including City Work-In Kind contributions of staff time and other resources as delineated in the Project Management Plan (PMP).		

As noted, the USACE project has been designed to be resilient to SLR through incorporating adaptive management components over time as needed to address rising seas. The project is Federally authorized under the Federal Water Resources and Reform Development Act (WRRDA) of 2014. The project is annually budgeted under the annual USACE work plan budgets, however, funds are not guaranteed/appropriated in every work plan/budget cycle due to competing projects.

The total budget of the PED Phase was \$1,912,000 and has a 65%/35% Federal/ State & Local cost share requirement. The average annual cost of the plan is \$2,140,000. Initial construction will be cost shared 65% Federal and 35% Non-Federal, and continuing construction (i.e., each renourishment and monitoring) will be cost-shared 50%-50%. The current estimated total initial placement cost of the plan is \$11,100,000. Continuing construction will consist of 8 renourishments with a total continuing construction cost estimated to be \$84,900,000 over the 50-year period. The sum of the first cost and periodic nourishments is estimated to be \$96,000,000. The preceding costs are based on estimates by the USACE and may be updated/change as the project moves closer to actual construction. The City has

expressed their interest in providing the Non-Federal matching funds to implement and construct the recommended plan as the preferred / primary coastal resiliency building measure.

### **Additional + Proposed Strategies for Consideration in the City**

In addition to the efforts the City has already undertaken, there are additional proposed measures the City may choose to implement to address identified vulnerabilities including protection of the public beach and resources landward. Project-level planning, technical study, and coordination with approving agencies would be required for each strategy to further develop and implement the measure(s). In addition, some of the strategies described below may be implemented through or assisted by the above USACE program. This Plan also acknowledges that SLR science and adaptation practices are dynamic; the City will need to monitor the rate of rising seas and associated coastal hazards and reevaluate adaptation strategies in the future based on evolving science and technology.

### **Hybrid Living Shoreline / Beach Sand Dune Complex**

The City is considering establishing a coastal dune system on the seaward side of coastal resources threatened by SLR to protect vulnerable community assets while creating intertidal beach habitat for species such as shorebirds and grunion as well. This concept is a blend of strategies aimed at preserving the variety of resources that depend on natural beach processes. There are remnant sand dunes along the beach in the northern portion of the City, and these are prioritized in the City's LCP for protection and enhancement.

Hybrid shoreline management approaches act as a middle ground between traditional shoreline protection and a living shoreline that relies solely on natural protective functions. Hybrid shoreline management measures use a combination of structural and "soft" techniques such as beach nourishment to allow for additional flexibility in project design. If implemented successfully, such an approach can provide the additional co-benefits of recreation, and habitat enhancement along with the increased protection of structural measures.

A key element in providing sustainable living shoreline elements such as dunes or cobble berms is to maintain a wide enough sandy beach to buffer seasonal beach profile changes and annual storm events. This can be achieved with regional beach nourishment upcoast, or local sediment retention features. Typically the structural elements are designed to remain buried behind/beneath this design beach profile and become exposed/uncovered only in an extreme event. Areas of San Clemente with an existing beach are the best candidates for this type of strategy.

Hybrid dune systems specifically involve a rock revetment or cobble berm that is then overlain with a sand buffer. Vegetation can also be utilized in hybrid dune systems to further stabilize dune structures and reduce erosion. Additional beach width and height provides an initial buffer for coastal erosion while also providing additional recreational area. The buried revetment or berm then acts as a hardened last line of defense to prevent damage to adjacent coastal resources under more severe storm events.

Maintenance is required over time as the sand layer erodes naturally, though the underlying structural element reduces overall sediment requirements as compared to a pure nourishment approach. Hybrid dune and cobble berm structures have been employed at several sites in Southern California due to their potential for multiple benefits. Projects have been fully implemented at Surfers Point in Ventura and Imperial Beach in San Diego, and construction of a hybrid dune at Cardiff State Beach (Encinitas) was completed in 2019.

The cost of a hybrid dune and living shoreline concept can vary significantly based on the source location of materials such as sand, cobble, and armor stone. The cost of the Cardiff State Beach living shoreline project was about \$2 million, which equates to a rough unit cost of about \$700 per linear foot (lf). If coordinated with maintenance dredging of San Juan Creek, or in combination with the USACE project or a regional beach nourishment project, there is an opportunity to significantly reduce the cost due to savings on mobilization costs and imported material.

A hybrid dune living shoreline could prove to be an effective adaptation with multiple benefits to offset adverse impacts resulting from SLR and beach erosion. The adaptive capacity of such a measure is heavily dependent on the amount of sand fronting the restored dune. If coupled with a regional beach nourishment program to offset the long-term erosion and future SLR, this measure could be very effective for the 3.3-foot SLR scenarios. For higher SLR scenarios (4.9 feet), this strategy would remain effective at reducing coastal hazards if the rates of re-nourishment are sufficient to keep pace with SLR. If the rates of re-nourishment cannot keep pace with SLR, then periodic and eventually permanent erosion of the restored dune system would be expected. Under a high SLR scenario, much of the back-beach development would require some form of adaptation to preserve the existing land uses. For example, beach parking would need to be elevated, protected, or reconfigured to accommodate the significantly higher tide range, wave run up and beach berm. While a hybrid dune living shoreline alone may not be sufficient to mitigate impacts from higher SLR scenarios, it could be implemented in combination with other measures and over several cycles of adaptation.

**Table 7-3. Proposed Strategy-Living Shoreline/Dunes/Cobble Berm**

Resiliency Strategy	Living Shoreline/Dunes
Implementation Timeline <sup>1</sup>	Planning: 1-2 years      Permitting: 2-3 years      Construction: 1 year
Timing	Near-term, based on storm frequency and intensity, based on comparisons to historic trends. Beach Erosion & Coastal Flooding Hazards 0.8 feet of SLR
Potential Resource/Asset Benefits	Protection of roadways and infrastructure Protection of shoreline structures and recreational resources Protection of public infrastructure including roadways, public parking, bike facilities, and public restrooms Restoration of coastal habitat (dunes) to the area Retention of economic benefits associated with beach recreation
Costs & Impacts	Construction costs (depends on length of shoreline protected >\$2.5 million per 0.50 miles) Moderate ongoing maintenance costs required (roughly \$100,000 per year, though costs increase with time) Less effective over time with increasing rates of SLR, particularly as SLR nears 5 feet, which may result in more frequent overtopping of an installed dune system
Permitting & Coordinating Agencies	USACE, USFWS, CCC, CSLC, California State Parks, CDFW, RWQCB, Caltrans
Next Steps	Secure funding sources from grants Modeling and additional study for concept design development Coordinate with agencies to develop concept design Public outreach

<sup>1</sup> Based on 2,900-foot-long Cardiff Beach Living Shoreline in Encinitas, CA. Source: State Coastal Conservancy 2018.

Reestablishment of the natural dune system is an effective SLR adaptation strategy that has been implemented in other jurisdictions facing similar coastal hazard threats within similar Southern California

community settings (e.g., at Cardiff Beach in the City of Encinitas and at Surfer's Point in the City of Ventura). Dune systems have been documented to reduce coastal storm damage, buffering the shoreline from wave attack during extreme storm events while also providing coastal habitat benefits.

A living shoreline would serve as a green protection strategy to address vulnerable infrastructure, resources, and assets within the City. This concept may include a cobble core persistent dune system or other engineering alternatives consistent with "living shoreline" principles (Figure 7-1). The City recommends engineering investigations that rely upon local sources of material to the maximum extent feasible. This adaptation strategy would also require a robust monitoring program, including pre-project monitoring to inform the design and to serve as baseline for post-implementation monitoring. A living

**Figure 7-1. Living Shoreline / Dune Concept**

*Dune concept for the Cardiff State Beach living shoreline project, which utilizes dunes to ensure protection for the adjacent Highway 101 and upland development.*



shoreline/dune system would require periodic maintenance. The need for maintenance and adaptive management efforts would likely increase over time with SLR.

To implement a living shoreline, the City would need to coordinate with federal, state, and local agencies to acquire necessary permits, including State Parks for any action within or immediately adjacent to a State Beach. Policies supporting this approach have been incorporated into the LCP Update and would allow the City to facilitate a living shoreline as an adaptation strategy.

Annual maintenance costs of a dune system is approximately \$10,000 (2018) per acre per year, not including the cost of labor for dune maintenance (Natural Resources Agency 2018). As with other adaptation strategies, costs associated with the establishment and maintenance of these systems would likely increase and would be influenced by the rate of SLR.

### Sediment Management Program

Sediment is nature's adaptation resource and its delivery to the coastal beaches, dunes, and estuaries is instrumental in habitat maintenance and natural defenses. Regional sediment management can augment existing sand and cobble supply to widen beaches and supplement naturally occurring sediment inventories. Wide beaches provide natural defenses against wave attack by dissipating wave energy and buffering the bluffs, dunes, and land uses from erosion. The maintenance of a wide and sandy beach, which can result from management of sediment transport as has naturally occurred historically, has widespread economic and recreational benefits for nearby communities.

The City had an opportunistic sediment management program in place between 2004 and 2018. The most recent sand placement from the opportunistic sediment management program was 12,000 cy of material from the Lower Santa Ana River dredging project in 2016. Recently, due to regulatory constraints and increasing monitoring costs, the City has temporarily put this program on hold, allowing USACE Regional General Permit (RGP) 66 for the San Clemente Beach Nourishment Program to expire in

February 2018 without renewal. A new local sediment management plan, or one prepared in conjunction with other entities such as the County of Orange, Parks Department to replenish the City's shoreline with currently exported sediment, would help to re-nourish the beach and improve coastal resiliency. Adaptation strategies that export sediment from the watershed to sandy beaches to mimic historical natural processes would go a long way to improve coastline resiliency within existing funding levels.

**Table 7-4. Proposed Strategy-Sediment Management Program**

Resiliency Strategy	Sediment Management
Implementation Timeline	Planning: 1-2 years      Permitting: 1-2 years      Implementation: Ongoing-20+ years
Timing	Near-term, based on a beach width distance, based on comparisons to historic trends. Beach Erosion & Coastal Flooding Hazards (approximately 0.8-foot SLR)
Potential Resource/Asset Benefits	Provides a local/native source of beach nourishment Increases and retains the quantity and quality of sand that is on the beach, potentially increasing the width of the beach Complements other adaptation strategies including the Living Shoreline, by maintaining beach nourishment Reduces the rate of beach erosion Enhances recreational value
Costs & Impacts	High ongoing costs Less effective over time with increasing rates of SLR, particularly as higher waves and larger storms have the potential to result in greater erosion rates Sediment transport via truck trips creates short term noise, restricts recreational access, commercial and residential activities
Permitting & Coordinating Agencies	USACE, USFWS, CCC, State Parks, CSLC, Caltrans, CDFW, Orange County Parks
Next Steps	Secure funding sources from grants Coordination with federal, state, and local agencies Public outreach

Development of a regional opportunistic sediment placement program for sediments and sand with the designation of specific receiver sites is a high priority for the City in coordination with other agencies, including the County of Orange, Parks Department. Regional sediment management is currently described in the County's Coastal Regional Sediment Management Plan (CRSMP) and as noted, updates to the CRSMP to address SLR were initiated in November 2021. Partnerships with other agencies including the County Flood Control District would likely be required to ensure successful regional management, including the need for a consistent sustainable funding source and compliance with regulatory permit requirements. Changing the approach to local debris basin cleanout activities and the deposition of these opportunistically available sediments/materials within the watershed should be investigated as well as transport to the beach or other adjacent coastlines depending on the extent of sediment transport, sediment quality and quantity, and potential local / regional benefits.

There are several components to a successful shoreline sediment management program that would benefit the City. This could include the following:

- Work with County and the OCCOG and other cities in the region to update the 2013 OCCRSMP to address SLR and coastal resiliency planning.

- » Develop a flexible regional opportunistic sediment placement program that identifies and permits specific placement or receiver locations in the City.
- » Streamline regulatory approvals with extended permit duration (e.g., 20 years).
- » Regulate existing practices that export debris basin sediments out of the watershed.
- » Create sustainable local, state, and federal funding programs and cost share agreements.

Beach sand nourishment is an important shoreline management practice in much of Southern California. Sand-only nourishment projects (e.g., without a retention component) can require millions of dollars in funding annually with a permit process and regulatory requirements sometimes constituting a substantial portion of project costs. Following the investment of time and resources, large wave events can strip beaches of all past nourishment and can require full replacement of beach nourishment. Therefore, development of projects that retain sand will be an important component of long term coastal resiliency in the City. Additionally, the time at which a storm occurs over the studied span of SLR directly influences the volume of sand needed for replenishment; a storm that occurs at approximately 1 foot of SLR would displace less sand and have a smaller re-nourishment cost than a storm event occurring at approximately 5 feet of SLR. Finally, sediment nourishment as a stand-alone project or resiliency strategy may be less effective with higher rates of SLR due to higher wave action and erosion, particularly during the winter season.

Permit processes can take several years, and the short lifespan / duration of permits (e.g., 5 years) can require expensive repetitious permit processes for similar projects. Sustainable funding, longer-term permit durations (e.g., 20-year program-level permits), and increased regulatory flexibility should be explored if beach nourishment is to continue to play a major role in SLR adaptation.

Similar to the living shoreline adaptation strategy, the sediment management adaptation strategy would reduce vulnerabilities to the areas within the City currently vulnerable to existing beach erosion and coastal flooding and may partially assist to protect portions of the City projected to be affected by approximately 4.6 feet of SLR.

### Sand Retention Structures / Nature Based Solutions

Sand retention measures include structures that prevent sand transport away from the beach and encourage sand deposition on the beach. Types of structures include the following alongshore and cross shore systems that can be designed to create multiple benefits in terms of sand retention, public recreational benefit and ecosystem services:

- › **Groins:** These structures serve to maintain a wider beach but have the potential to diminish horizontal access along the beach. Constructing groins and other structures on the beach or in the ocean typically requires habitat mitigation (e.g., restoration of comparable habitat in another location) and could alter the character of San Clemente’s natural shoreline. New groin designs may become available in the future, so this option should be evaluated over time.
- › **Breakwaters:** These structures maximize wave reduction and sand retention but can disrupt and alter wave patterns and interfere with surfing resources, which may negatively impact the City. Current permitting and mitigation requirements, and the degree of potential negative impacts, may restrict use of breakwaters as an adaptation measure. New breakwater designs may become available in the future, so this option should be evaluated over time.
- › **Multi-Purpose Artificial Reefs:** These structures create rocky reef habitat and have potential to enhance surfing resources; however, using artificial reefs to retain sand and enhance surfing is still in the conceptual/experimental phase of development. Reefs have been investigated, constructed, and tested in various locations, including Orange County (e.g., Wheeler Reef Phases 1-3). Successful reef installation remains a work in progress to date. New reef designs may become available in the future to ensure that reef implementation will provide the intended benefits, so this option should be evaluated over time.

Additionally, other structures have sand retention value while reducing the physical disturbance/presence of the structure and associated costs. As described below, these options include a cross-shore structure or headway of rock or cobble that limits sand movement downcoast and an offshore breakwater or reef that retains sand in-place by reducing wave energy before it reaches the beach. Sand retention structure adaptation strategy strategies could reduce vulnerabilities to areas within the City that would otherwise be vulnerable to existing beach erosion and coastal flooding with approximately 3.3 feet or greater of SLR.

**Table 7-5. Proposed Strategy-Sand Retention Structures**

Resiliency Strategy	Sand Retention Structures
Implementation Timeline	Planning: 2-5 years      Permitting: 2-5 years      Construction: 2-10 years
Timing	Near-to Mid-term, based on SLR elevation and beach width distance, as indicated by a change from historic trends. Beach Erosion & Coastal Flooding (between 0.8 and 4.9 feet SLR)
Potential Resource/Asset Benefits	Physically maintain existing land area with associated infrastructure Capture sand drift within retention structures Reduce loss of sand and habitat along shoreline Potentially increase effectiveness of winter berm or living shoreline improvements, depending on placement Potentially provide recreational opportunities



Resiliency Strategy	Sand Retention Structures
Costs & Impacts	<p>Construction costs</p> <p>High, ongoing maintenance costs required</p> <p>Less effective over time with increasing rates of SLR, unless the installed structures are heightened over time</p> <p>Alteration to wave energy, potential associated loss of coastal access and recreational opportunities</p>
Permitting & Coordinating Agencies	<p>California State Parks, CCC, CSLC, County of Orange, USFWS, CDFW</p>
Next Steps	<p>Coordination with state and adjacent jurisdictions on project feasibility</p> <p>Modeling, engineering, and additional environmental investigations required</p> <p>Public outreach</p> <p>Identify/secure funding from public agencies or grants</p>

### Cross-Shore (Shore Perpendicular) Sand Retention Structures

Sediment transport along the shoreline is predominantly from north to south. In areas with dominant along-coast sediment transport, cross-shore sand retention structures tend to trap sand up coast of the retention structure in what is called a “fillet,” which are often used to widen beaches and provide more natural defenses to coastal wave hazards. While a stone revetment may provide more suitable habitat for shorebirds and other coastline species, cobble can be utilized to provide a stable base for dune placement and maintain public access to the beach. Both rocks and cobble are appropriate materials to dissipate wave energy, though cobble can be more effective at reducing sand placement loss (Komar & Allan 2010). Though these protection options may be challenging to design consistent with the Coastal Act and local coastal policies, they may be options to consider for sand and sediment retention along the City’s shoreline.



**Figure 7-2. Cross-Shore Rock Revetment**

*A cross-shore rock revetment has been implemented to retain sand and protect vulnerable neighborhoods from beach erosion.*

Specific design considerations must be examined to avoid downcoast impacts resulting from the interruption of sand transport caused by the cross-shore structure. This typically involves beach nourishment both up and down drift of the retention structure to prevent loss of sand to downcoast beaches, emphasizing the need for regional coordination for such projects. As these types of projects result in potential regional changes to sediment transport, adjacent jurisdictions would need to be involved in the process; extensive outreach to these jurisdictions would be required along with a technical feasibility study to determine cost-benefits, structural design, funding, and processing requirements. The process would also involve agency permitting and environmental review.

### Offshore Multi-Purpose Reefs

Erosion and coastal flooding are often caused by large waves running up the beach. If the wave energy can be reduced before it reaches the coast, then less beach erosion and flooding would occur. The offshore natural and man-made reefs already provide some natural defense in reducing wave energy by

causing some waves to break farther offshore. However, as an adaptation strategy, engineered offshore structures could further dissipate wave energy. Offshore structures can reduce wave energy as it reaches the shore to reduce sand movement from the beach and, as a result, slow sand transport along the shoreline, acting as retention structures. The most common form of offshore structure is an offshore breakwater (e.g., Ventura or Channel Islands Harbor), or a multi-purpose reef, which may provide shoreline protection, recreational benefits and habitat benefits (e.g., Natural Shoreline Infrastructure oyster reef projects in San Francisco Bay) (The Nature Conservancy 2017). These structures can be designed to mimic nature-based solutions that are made of natural material (rock) and can replicate natural rocky structures offshore. Regarding offshore artificial reefs, both natural (e.g., recycled shell, gravel) and manmade (e.g., concrete, aggregates) materials can be used to construct artificial reef elements. Prior Natural Shoreline Infrastructure oyster reef projects in San Francisco Bay have used concrete "Reef Ball" installations, which cost approximately \$500 to \$550 (2018) per linear foot in a direct line, and between \$700 to \$1,000 (2018) per linear foot when arranged to accommodate a denser installation pattern (California Natural Resources Agency 2018). These options would similarly require initial outreach with adjacent jurisdictions, followed by an extensive feasibility study to determine the permit path and potential regional impacts.

The City of Solana Beach and the USACE worked to develop a conceptual engineering design for an artificial reef located offshore from Fletcher Cove, the City of Solana Beach's main beach. The primary goal of the reef would be to retain sand to create a wider beach and reduce direct wave attack on the City's coastal bluffs. Secondary but important goals of the project are to provide recreational enhancement and biological resource value immediately offshore. The conceptual project is based on the multi-purpose conceptual reef planned for Ventura County (Oil Piers Reef). In April 2010, the USACE and the City of Solana Beach completed the conceptual engineering design study for a submerged reef at Fletcher Cove. Federal, State, and local funding commitments for future phases of the project are being pursued to support the initiation of necessary environmental review, design, and permitting activities. Although the project has been on-hold since 2013 due to lack of funding, this project could be used as an example of information and the need to develop site-specific data and to replicate nature as much as possible when pursuing a structure.

### **Storm Drain and other Public Utility System Improvements**

A major infrastructure challenge associated with SLR is the need for efficient, rapid drainage of storm water. Some segments of the City's existing storm drain system that are lower in elevation and closer to sea level may lack the elevation requirements necessary for a gravity flow system to effectively accommodate current and projected storm events. Some storm drains are located down-gradient from outfall locations, at a lower elevation than necessary for gravity flow, which is a problem that becomes exacerbated during high tide storm events when outfalls can be inundated. Presently, the existing infrastructure is not always able to accommodate all storm water flow, which can flood portions of the City's shoreline including coastal access points that cross beneath the railroad corridor. As sea levels rise, greater portions of the system may not drain during high tides and during more of the tide cycle, which, in turn, may increase storm water flood depths and frequency. Culverts and pipes may also create back flows of ocean water into the neighborhoods. Flood risks within high-hazard areas can be addressed by upgraded infrastructure accomplished through a combination of elevation, relocation, redesign, and retrofitting, as necessary, to preserve recreational and commercial use. Infrastructure upgrades could improve resiliency in San Clemente.

**Table 7-6. Proposed Strategy-Storm Drain Improvements**

Resiliency Strategy	Storm Drain Improvements
Implementation Timeline	Planning: 3-4 years      Permitting: 4-5 years      Construction: 2-10 years
Timing	Near-to Mid-term, based on SLR scenario where coastal flooding & tidal inundation after 0.8 feet of SLR has occurred.
Potential Resource/Asset Benefits	Accommodate stormwater and reduce inundation Remove storm water from low-lying areas during rain events, and from future tidal Inundation Reduces the duration of flooding during storm/tidal events Can be relatively adaptable to higher volumes of water during pump replacements
Costs & Impacts	Construction/replacement costs High ongoing maintenance costs required, and frequent maintenance checks to ensure operational reliability during storm or tidal inundation events Requires reliable energy to operate during events
Permitting & Coordinating Agencies	CCC, CSLC, Caltrans
Next Steps	Establish a Citywide Capital Improvement Program (CIP) to incorporate "Green Street" and storm water infrastructure in public right of way improvement projects to support improved drainage/storm water runoff through the City Evaluate the need to replace existing culverts that may contribute to coastal hazards Investigate the use of pumps to move water out of areas affected by future tidal inundation areas Public outreach Secure construction and operational funding sources (e.g., assessment district, public agencies, etc.)

The City may need to investigate of the use of storm water pumps and/or lift stations (pumps) to move water out of low-lying areas of the City if they experience tidal inundation with areas of ponded flood waters from rainfall event storm water runoff. As tidal inundation increases with SLR, even without heavy rainfall or runoff events, the use of pumps to move water out of the lower-elevation areas may be warranted. The use of pumps is moderately adaptable, as the pumping capacity could be increased or improved over time when the pumps need to be replaced. As the necessary volume of water to be pumped increases, operational and maintenance costs would likely escalate over time. Additional challenges for the operation of storm water pump systems can include accommodating the large amounts of organic / fibrous material and solids that often accompany storm water.

Accommodation for storm drain improvements could be integrated to the City's Capital Improvement Program (CIP). The action item would have the intent of improving storm water runoff, reducing tidal inundation, and accommodating larger volumes of storm or tidal water that have the potential to affect inundate vulnerable areas of the City. The range of options for consideration under the CIP action item should also include preventative measures before storm water or tidal effects can reach the storm drain systems (e.g., inlets, outfalls). At this time, no funding source has been identified for these potential improvements.

## Chapter 8: Regional Assets and Multi-Jurisdictional Coordination

Several of the critical facilities and assets within the City that are vulnerable to SLR are managed by other local, state, and federal agencies. These include LOSSAN Corridor, Pacific Coast Highway/U.S. 101, and San Clemente State Beach. Adaptation measures for these important public assets and facilities requires coordination, collaborative regional solutions, and partnerships with adjacent and affected jurisdictions and entities, including the County of Orange, California State Lands Commission (CSLC), CCC, State Parks, USACE, the California Governor's Office of Emergency Services (Cal OES), and FEMA; infrastructure and transportation providers, such as Caltrans and LOSSAN; and special districts including the Santa Margarita Water District (SMWD).

Good adaptation planning is collaborative, considering interconnected ecological, social, political, and economic systems. Partnerships and dialogue between the City and agencies would be essential in developing and implementing sound regional adaptation strategies. Through coordination with other jurisdictions and agencies, the adaptation planning process aims to improve coordination and leverage local resources to minimize vulnerabilities and impacts associated with SLR.

### Existing LOSSAN Railroad Corridor

The existing railroad and revetment that traverses through San Clemente is owned and operated by the OCTA. The OCTA was awarded an SB 1 Adaptation Planning Grant in 2019 from Caltrans to fund a study entitled the *"Orange County Rail Infrastructure Defense Against Climate Change Plan."* The study identifies strategies to evaluate the negative effects of storm activity, increased precipitation levels, SLR, temperature increases, and associated climate events on the OCTA-owned rail right-of-way in Orange County and develop strategies to ensure resilience of the transportation services and assets. OCTA completed the study in January 2021 entitled *"Orange County Rail Infrastructure Defense Against Climate Change Plan"*, which identified vulnerable locations, and assessed short-and long-term alternatives to improve resiliency of the transportation system that is utilized by disadvantaged communities and military operations, as well as contributes to a thriving economy. City Staff participated as stakeholders with OCTA as part of their outreach efforts related to the development of this study.

### Pacific Coast Highway

El Camino Real (Pacific Coast Highway to the north of the City) traverses the City inland of the railroad and serves as a primary regional access route. The roadway is under the jurisdiction of Caltrans District 12. The City should continue to coordinate with Caltrans to efficiently facilitate any adaptation measures determined by Caltrans to be required to ensure the roadway remains resilient to SLR over the long term.

### Wheeler North Reef Phase Three Expansion Project

The Wheeler North Reef Phase 3 project (WNR) area is located adjacent to the existing Phase 1 and 2 reef sites about 1,000 feet offshore of the City of San Clemente, between the San Clemente City Pier to the north and San Mateo Point to the south. The Reef complex is located offshore at a water depth that ranges from 34 feet to 49 feet in the Pacific Ocean. The WNR Phase 3 reef area encompasses approximately 1,200 acres.

Southern California Edison Company (SCE) is expanding the Wheeler North Reef to satisfy California Coastal Commission (CCC) Permit No. 6-81-330-A. Phase 1 (SCE's test modules) and the Phase 2 portion of the reef has been completed. Phase 3 is anticipated to be completed in July 2020. While the reef is

intended as a mitigation project to offset operational impacts associated with the San Onofre Generating Station (SONGS), some nominal indirect/incidental sand retention benefits may be generated by the project due the reef modules effects on reducing wave energy.

### **Ongoing Resiliency Efforts and Additional Efforts for Consideration**

The City may consider continuing existing strategies or pursuing new strategies to help protect valuable public and coastal and infrastructure resources within the City of San Clemente. While these strategies have not been evaluated in detail for their potential effectiveness under various SLR scenarios, we have included some approximate SLR thresholds for each strategy which may be useful for planning purposes and consideration of phasing SLR adaptation options.

#### **SAN CLEMENTE WINTER STORM BERM PROGRAM**

This is an existing and ongoing program. It is recommended that the City continue to implement the annual winter storm berm program along the beach in the near term while monitoring rates of SLR and storm frequency. This strategy would need to be modified in response to an 0.8 foot SLR scenario as the berm would need to be higher and wider to mitigate storm flooding. When the USACE project is implemented, it is anticipated that the winter berm program will be more effective even with 0.8 feet of SLR.

#### **SAN CLEMENTE & USACE COASTAL STORM DAMAGE REDUCTION PROJECT**

This is an existing and ongoing program. It is recommended that the City pursue remainder PED funding in FY 21/22, and subsequent years as needed, to complete the in-progress PED phase of the project. The City should also continue to seek construction funding support from the Federal government and State government so that the City can implement the program as soon as possible following completion of the PED phase of the project.

The USACE *Feasibility Study* evaluated sea level rise of 0.7 meters (2.3 feet) and concluded one extra nourishment over the 50-year initial period would be required to offset the increase in shoreline erosion due to projected future sea level rise. Based on the recommendations and conclusions of the USACE Feasibility Study the program is anticipated to remain effective up to the 3.3-foot SLR scenario near the project area. Beyond the initial 50-year project life, increases in nourishment volume and frequency may be required depending on SLR trends.

#### **HYBRID LIVING SHORELINE/DUNE SYSTEM/COBBLE BERM**

Design and construct a living shoreline pilot project to function as a permanent storm berm that could either supplement or replace the annual winter berm and protect the City's shoreline once the 3.3-foot of SLR scenario appears to be a reality. This strategy would need to be implemented along with a local or regional nourishment program that is able to sustain a wide enough beach (~30-50 feet) to function as a living shoreline.

This could be undertaken in conjunction with the sand retention structure(s) described above or independently. Install hybrid dune structures along the City's northern shoreline. Utilize existing structures as material for the structural component of the hybrid dune. Align hybrid dune design with any planned beach nourishment activities. Develop a monitoring program to evaluate performance and maintenance needs of hybrid dune structures over time. Evaluate the performance of the Cardiff Living Shoreline project that is operational in northern San Diego County (Encinitas) and for lessons learned.

The SLR threshold for this strategy varies depending on the scale of the local or regional beach nourishment program. A significant nourishment program could be sufficient to allow for a living shoreline/dune system to remain functional for SLR of up to 3.3-feet or higher depending on what long-term decisions are made regarding the railroad corridor.

#### **REGIONAL COASTAL RESILIENCY BUILDING PROJECTS**

Once cost-effective regional resiliency building programs or management strategies have been identified, such as those which may be undertaken in Dana Point, Camp Pendleton, and the County of Orange by Caltrans or others, the City will work with regional partners to expeditiously implement these programs. The City could collaborate with Dana Point and the County of Orange on shoreline management projects at the City's northern border including the development of the Master Plan for Capistrano Beach which is currently in the early design/alternatives phase.

#### **SEDIMENT MANAGEMENT PROGRAM**

The County of Orange prepared the "Orange County Coastal Regional Sediment Management Plan" (OCCRSMP) in 2013 to develop a coastal regional sediment management plan that provides sufficient information for decision makers to develop policies and/or execute management sub-plans for the future vitality of Orange County beaches and shoreline areas. The OCCRSMP identified the City's beaches as critical erosion hot spots and also noted that 3 million visitors per year come to the City's beaches, generating \$87 million in annual spending annually as of 2013. The OCCRSMP outlined coastal maintenance needs through a multi-pronged approach ranging across geographic regions and utilizing many possible methods. The first steps to fully implement the OCCRSMP would be collaborative discussions between local agencies before a JPA could be modified or formed. This JPA would have the task of implementing and updating the OCCRSMP over the next 50 years. The City should continue to coordinate with the County to pursue one or more of the strategies laid out in the OCCRSMP as a supplemental SLR adaptation strategy.

#### **SAND RETENTION STRUCTURES**

Assess the potential of sand retention structures, in conjunction with beach replenishment efforts, to increase beach width, as well as the need to pre-fill the beach to avoid creating downcoast effects. Depending on the design, these measures are more appropriate for utilization before approximately 2 feet of SLR has occurred and should be implemented by the time approximately 1 foot of SLR has occurred unless the installed structures are modified or heightened over time. The existing Phase 1 and 2 of the Wheeler North Reef project may provide some sand retention effects for the southern half of the City, and the Phase 3 expansion reef complex will cover the area in the City to its northern border near the Poche public beach access point. However, a nearshore reef which resembles the existing reefs at T-Street or Riviera would be required to have a meaningful effect on sediment retention and such a system would need to be designed to perform well over time for specific SLR thresholds.

#### **STORM DRAIN IMPROVEMENTS**

Install water pumps within storm water drains in the City to reduce the threat of flooding from storms and tidal inundation. This is an adaptive measure that could be monitored as necessary over time to address changing conditions. While not currently necessary, planning should begin with approximately 1 foot of SLR, and implementation should occur with approximately 2 feet of SLR.

## Chapter 9: Funding Opportunities and Mechanisms for Resiliency

Coastal resiliency building is a complex undertaking and the City will need to secure funding to implement any of the strategies described in this Plan. Anticipated challenges will include acquiring the necessary funding for implementing strategies and gaining commitment and support from federal and state government agencies to address the local realities and challenges. Lack of resources from state and federal agencies will hinder or delay implementation. To support its success, the City will continue the regional dialogue and maintain state and federal partnerships to identify, fund, and implement preferred resiliency solutions. Potential sources of funding that could be explored by the City are described below.

### Establishment of a Shoreline Account

The City may consider establishing a “Shoreline Account,” which would serve as the primary account where all funds generated pursuant to future resiliency building programs and projects would be held. The City should invest the Shoreline Account funds prudently and expend them for purposes outlined in this Plan including, without limitation:

- Sand replenishment and retention studies and projects;
- Opportunistic beach nourishment programs and development of stockpile locations;
- Updating the mean high tide line survey;
- Preparation of seasonal / annual beach profile surveys and monitoring programs;
- Repair and maintenance of shoreline protection systems (such as the winter storm berm or a living shoreline) subject to reimbursement by the affected and/or non-compliant property owners; and
- Repair and replacement of beach access infrastructure and recreational amenities.
- Storm Drain pumping systems to minimize future flooding
- Improvements to or new access in and around the City’s Municipal Pier

The City may use the funds in the Shoreline Account, subject to the restrictions of any terms of the funding sources, to pay for projects such as beach sand replenishment and retention structures, public recreation and public beach access improvement projects, feasibility and impact studies, operating and maintenance expenses, and to pay to conduct surveys and monitoring programs. Some potential resiliency building programs and funding mechanisms that can be further explored are described below.

### California State Parks, Division of Boating and Waterways Grants

State Parks, Division of Boating and Waterways (DBW) administers two coastal protection programs: The Shoreline Erosion Control Program and the Public Beach Restoration Program. The general objectives of these programs are to preserve and protect the California shoreline, minimize the economic losses caused by beach erosion, and maintain urgently needed recreational beach areas. This can be achieved by cosponsoring the construction of beach erosion control projects with local and federal agencies, improving present knowledge of oceanic forces, beach erosion and shoreline conditions, and using this knowledge to prevent future erosion.

Government agencies, such as the City, are eligible to apply for local assistance grants through these programs. The Shoreline Erosion Control Program can assist in the planning and construction of all types of beach erosion control and shoreline stabilization measures, including hard structures like seawalls. This program can fund up to 50 percent of nonfederal project costs. This Program is authorized in statute

by Harbors and Navigation Code sections 65-67.4. The Public Beach Restoration Program can assist in the planning and construction of engineered placement of sand on the beach or in the nearshore environment. This program can fund up to 85 percent of nonfederal project costs at non-State beaches. This Program is authorized in statute by Harbors and Navigation Code sections 69.5-69.9.

### Geologic Hazard Abatement District

Assessment districts are common funding mechanisms for utilities, such as water supply and utility providers. Establishment of a [Geologic Hazard Abatement Districts \(GHAD\)](#) may be a useful tool to explore for groups of affected property owners to self-assess and self-fund one or more of the coastal resiliency strategies described in this Plan. Establishment of a local or regional GHAD provides opportunities for beach and bluff front property owners to establish an assessing entity to implement one or more of the priority adaptation strategies described above. A GHAD could provide a potential means for future renovations or improvements to flood control structures, including future alterations that may be necessary because of SLR. By accumulating a funding reserve for future maintenance and rehabilitation, a GHAD can provide the financial resources necessary for potential future expansion, maintenance, or repairs of infrastructure or other structures. Further, because of the relative safety of GHAD revenues (typically financed through the collection of supplemental tax assessments), GHADs can borrow from lenders or issue bonds with very attractive credit terms. A GHAD should be established to better assess hazards and fund improvements for issues that affect a larger regional area, resulting in greater reserves of funding and often improved maintenance or repair services. Given the threat from coastal hazards extends beyond the City, the possibility exists for establishment of a GHAD that includes areas of the City, as well as threatened adjacent communities / neighborhoods to the north.

### Infrastructure Financing Districts

As of September 2014, California law allows cities and other entities to create enhanced infrastructure financing districts. This allows incremental property tax revenues to be devoted to a specified purpose such as a fund for cleanup, infrastructure, parks and open space, transportation, or other things that could be applied to a variety of adaptation approaches. With the passage of Assembly Bill 313 and Senate Bill 628, the requirements for establishing these districts have been streamlined. The intent of these bills was to fill the local funding void left by the dissolution of the redevelopment agencies. Basically, the City would establish an Economic Infrastructure Financing District (EIFD), develop a business plan with priority projects (e.g., infrastructure, adaptation, etc.), and then draw funds from changes in local tax revenues occurring as part of a redevelopment or rezone or apply for grant funds.

### Dedicated Sales or Transient Occupancy Tax (TOT) Increase

#### TOT INCREASE

TOT from hotel stays and short-term vacation rentals provide a source of General Fund revenues for the City. A dedicated increase in this TOT (e.g., 2% for sand) could be reserved specifically for resiliency approaches that maintain the City's beaches and open spaces. Presently the TOT rate is 10%; a potential increase of 2% could yield an additional \$530,000 annually. A regionally coordinated increase in TOT to provide regional funding for coastal improvements, maintenance, or repairs could also be coordinated with other jurisdictions in the County.

#### SALES TAX INCREASE

The City may consider this approach or coordinate on a countywide approach such as a quality of life initiative to generate local revenues to be used to finance long-term coastal resiliency strategies. The City



of Solana Beach (San Diego County) instituted a two percent sales tax increase that is used as a dedicated source of funding for coastal resiliency building.

### **Local Hazard Mitigation Planning and Pre-Disaster Assistance**

There is overlap between LCP planning and the Local Hazard Mitigation Plan (LHMP) as both address a potential range of hazards in a given City. California Governor's Office of Emergency Services' (Cal OES') Hazard Mitigation Planning Division and FEMA's Hazard Mitigation Assistance grant programs provide significant opportunities to adapt by reducing or eliminating potential losses to the City's assets through hazard mitigation planning and project grant funding. An update to the City's LHMP would be required to add SLR and climate change-related hazards and to make adaptation projects eligible for federal funding. Currently, Cal OES and FEMA have three grant programs: Hazard Mitigation Grant Program, Pre-Disaster Mitigation, and Flood Mitigation Assistance. The total value in each of the grants vary annually based on federal funding authorization, but typically each is in the 10s to 100s of million dollars.

### **Impact Mitigation Fees or In Lieu Fees: Sand Mitigation / Public Recreational Impact Fees**

Impact mitigation, or in lieu fees, are another way to generate monies for adaptation measure implementation. Certain structured fees could be established to generate revenues for: 1) covering the necessary planning of, technical studies for, design of, and implementation of adaptation strategies, or 2) developing an emergency cleanup fund to be able to respond quickly and opportunistically following disasters. Disasters, through a different lens, are opportunities to implement changes.

There are currently two structured fees that the CCC uses to address the impacts of shoreline protection – a Sand Mitigation Fee and a Public Recreation fee. The Sand Mitigation Fee is a fee intended to mitigate for the loss of sand supply and loss of recreational beaches in front of structures. The Public Recreation Fee addresses impacts to the loss of public recreation based upon the loss of beach area physically occupied by the coastal structure. An additional fee for ecosystem damages is under consideration by the CCC, which could assess a fee based on the cost of restoration or replacement value of the damaged habitat.

#### **SAND MITIGATION FEE**

Such a fee would mitigate for actual loss of beach quality sand, which would otherwise have been deposited on the beach. For all development involving the construction of a bluff retention device, a Sand Mitigation Fee could be collected by the City to be used for sediment management purposes. The fee could be deposited in an interest-bearing account designated by the City in lieu of providing sand directly to replace the sand that would be lost due to the impacts of any protective structure. Consideration of sand volumes lost over time should factor into whether actual sand placement is preferred or whether the volume/\$ should be retained until a substantial volume can be contributed. The methodology used to determine the appropriate mitigation fee has been approved by the CCC in past cases. The funds should solely be used to implement projects that provide sand to the City's beaches, not to fund other public operations, maintenance, or planning studies.

#### **PUBLIC RECREATION FEE**

Similar to the methodology used by the CCC for the Sand Mitigation Fee, the CCC has used a methodology for calculating a statewide public recreation fee. The City could develop administrative processes consistent with CCC guidance, including development of impact mitigation fees for public access and

recreation, proposing a public recreation/access project in lieu of payment of Public Recreation Fees to provide a direct recreation and/or access benefit to the general public, and project prioritizations.

### **California Infrastructure and Economic Development Bank**

The California Infrastructure and Economic Development Bank (IBank) was created in 1994 to finance public infrastructure and private development that promote a healthy climate for jobs, contribute to a strong economy, and improve the quality of life in California communities. IBank has broad authority to issue tax-exempt and taxable revenue bonds, provide financing to public agencies, provide credit enhancements, acquire or lease facilities, and leverage state and federal funds. IBank's current programs include the Infrastructure State Revolving Fund Loan Program, California Lending for Energy and Environmental Needs Center, Small Business Finance Center, and the Bond Financing Program.

### **Green Bonds**

Bonds are debt instruments that allow governments and other entities to borrow money from investors and repay that investment over a certain time at a certain rate. Government bonds often remain tax exempt, meaning the interest that investors earn is tax exempt. Bonds are a very traditional and familiar platform for financing public infrastructure and government programs, and recently the market has developed "green" bonds to finance green adaptation infrastructure.

### **Proposition 1 and Proposition 68 Grant Opportunities**

The California Department of Fish and Wildlife (CDFW) has available funding opportunities for multi-benefit ecosystem restoration and protection projects under both Proposition 1 (Water Quality, Supply, and Infrastructure Improvement Act of 2014) This grant funding opportunity make available funds for public agencies for planning activities that lead to specific on-the-ground implementation projects, funds for implementation activities (e.g., construction and monitoring) of restoration and enhancement projects, and funds for acquisition or purchases of interests in land or water

Following passage of the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access for All Act of 2018 (Proposition 68), \$40 million has been appropriated to the California Natural Resources Agency for competitive grant funds that protect, restore, and enhance California's cultural, community, and natural resources to address climate resiliency and adaptation. Funding under this program is available to local agencies and other eligible applicants for projects qualifying under a number of categories including resource protection, enhancement of park, water, and natural resources, and improvement of community and cultural venues or visitor centers.

## Chapter 10: Conclusions, Recommendations and Next Steps

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This Plan represents the beginning of the City's phased adaptation efforts to begin to build coastal resiliency and adapt to SLR by reducing risks in the City and exposure of assets to coastal hazards. Reviewing current City programs and policies associated with SLR risk reduction, such as those around shoreline protection, is the first step to identify immediate adjustments to alleviate or eliminate risks. Where adjustments to current practices will not sufficiently address the risks, then more substantial actions must be identified and should be implemented within a future LCP Amendment. This effort will be ongoing in the coming years as understanding of the variables involved in climate science continues to improve.

This Plan is intended to establish a process in which new data and information will be assessed, as needed, to inform adaptation decisions and actions. As such, it is anticipated that the Plan will be periodically re-evaluated and updated.

All resiliency strategies have been evaluated for conformance with the relevant City and state policies, plans, and guidelines which include the following:

- San Clemente Local Coastal Program (LUP and IP)
- San Clemente General Plan
- San Clemente Climate Action Plan
- San Clemente Local Hazard Mitigation Plan
- CCC and OPC Sea Level Rise Policy Guidance
- CRA Safeguarding California Plan

Resiliency building measures within this Plan focus on ways to best obtain, utilize, and disseminate current and future SLR information to inform decision-making in coastal areas. Coastal Resiliency and Adaptation Measures include the following:

- Use of best-available science. The City has identified and uses the best-available sea-level and coastal hazard science and requires it for site-specific vulnerability assessments, discretionary permit applications for projects in the Coastal Zone and preparation of required technical reports.
- Shoreline Profile Monitoring. Establishment of an ongoing shoreline profile monitoring program would enable the City to establish baseline conditions now, at various transect locations in the City each spring and fall against which future SLR impacts and shoreline changed could be monitored.
- Identified planning horizons and/or SLR thresholds. Development and/or redevelopment requires the use of appropriate planning horizons, and/or SLR thresholds and incorporation of SLR-related risks, probabilities and uncertainties associated with planning horizons, as well as model projections.
- Sea-level rise hazard maps. Published maps in the SLRVA identify areas exposed to potential future hazards under different SLR scenarios and designate areas that require further monitoring or analysis. The maps may be used in combination with other adaptation measures including site specific geological studies, siting to avoid hazards, and coastal bluff development setbacks, to provide additional analysis of potential hazards.

- Hazard monitoring. The City will conduct ongoing hazard monitoring efforts in an effort to better understand potential SLR impacts and use the data to inform future planning and decision-making.

### Financing Strategies

The City is proactively developing coastal resiliency programs, projects and policies (see 2018 LCP), and exploring financing strategies to address potential future SLR impacts. However, implementation of resiliency-building policies, plans, and programs takes substantial time and investment to get to the implementation/construction phase.

Reducing the impacts of SLR and increased coastal erosion and flooding will require extensive and ongoing coordination with federal, state, and regional agency partners, investment in community resiliency, and a financial program to be able to ensure that the City's long-term community vision is maintained now and long well in to the future.

As next steps, the City should identify, evaluate, and pursue all feasible potential sources of revenue for funding-preferred actions identified in this Plan. The costs of priority strategies should be allocated and shared in proportion to the benefits realized by the affected parties, including the public, the City, businesses, and private property owners, respectively. The City's financing strategy could include the following:

- Coordinate with the County of Orange and cities of Dana Point and Oceanside to explore sustainable local funding sources for shoreline management and adaptation measures such as uniform increases in TOT, local bond measures, changes to any assessment districts to include shoreline management, etc.
- Actively continue to seek state and federal funding for expedited implementation of priority adaptation strategies and prioritize the creation of a wider beach and a beach profile that can feasibly be established and maintained on City beaches for shoreline protection and recreation benefits.
- Work with the League of California Cities, Coastal Cities Group, OCCOG, the County of Orange and Camp Pendleton to lobby state and federal legislators to create sustainable long-term funding programs for adaptation planning and capital improvements, including beach nourishment programs.
- Support formation of a GHAD or EIFD to enable self-funding of selected projects.

### Future Technical Studies and Analyses

This Plan builds on the findings of the SLRVA regarding potential hazards to the City from SLR. Given the dynamic nature of SLR science and potential vulnerabilities, the following issues merit further investigation.

#### **COST-BENEFIT ANALYSIS**

For any/all preferred coastal resiliency measures the City is interested in pursuing, such as a living shoreline, hybrid solution or beach sand dune system, a Cost-Benefit Analysis would show which strategies would be more cost effective and yield greatest benefits relative to an investment of public funds. Importantly, this analysis is required for most competitive grant programs and would be included as part of an application for grant funding in California.

### **CRITICAL INFRASTRUCTURE MASTER PLANS**

This Plan would identify infrastructure that may be vulnerable to coastal hazards, including transportation, water and sewer, and storm water, and enable the City to leverage the unique opportunity of proposed public facility revitalization initiatives to build adaptive capacity into new and redeveloped City/public infrastructure. Future coastal hazards are anticipated to require resiliency measures be implemented as part of the City's Capital Improvement Program (CIP). Critical Infrastructure Master Plans can support the City in an effort to systematically identify vulnerable segments and address potential upgrades, and timing for such capital improvements considering SLR.

### **DEVELOPMENT OF A CIP FOR COASTAL RESILIENCY**

The City should explore the development of Capital Improvement Program (CIP) for ensuring that all necessary public infrastructure in the City that is required for public health and safety are going to be resilient in the future under SLR scenarios described in this Plan and Final SLRVA (2019).

### **Public Outreach and Community Involvement**

The City will continue to solicit input, comments, and feedback from the public, agencies, and interested parties on these proposed adaptation strategies. Successful implementation of any adaptation strategy requires communication of vulnerabilities, potential adaptation tradeoffs, costs, and alternatives. Outreach efforts designed to inform community residents and stakeholders, including disadvantaged communities and vulnerable populations, of potential future coastal hazards will be conducted by the City during the decision-making processes on proposed new adaptation strategies.

### **Multi-Agency and Regional Coordination**

Adaptation planning for priority strategies is anticipated to require significant regional or multi-jurisdictional coordination and funding. The City cannot adapt to the impacts of SLR alone given the regional and global effects of SLR and the commensurate need to have regional or larger-scale adaptation strategies. The City will need to address coastal hazards by establishing collaborative regional solutions and partnerships with adjacent and affected jurisdictions and entities. The City is taking the following actions to work with local, regional, state, and federal agencies.

- Establish and actively coordinate with regional partners on a regular basis to promote essential regional adaptation strategies and pursue cost-sharing agreements. Such agencies should include, but are not limited to, Dana Point, Orange County, and Marine Corps Base Camp Pendleton.
- Lobby state and federal legislators to implement legislation that requires California Public Utilities Commission (CPUC) and OCTA coordination with local jurisdictions on SLR and adaptation planning, protection of coastal habitats, and preservation of public lateral and vertical coastal accesses.
- Continue to coordinate with the OCTA on adaptation planning for critical facilities, including the SCRRRA railroad and revetment that traverses the City's shoreline.
- Continue to coordinate with Caltrans on agency-specific vulnerability assessments and future planning/implementation of key infrastructure, such as U.S. Highway 101.

### **Monitoring Sea Level Rise and Implementation Actions**

Sea level is inherently variable in response to predictable astronomical tides and less predictable atmospheric events such as El Niño and individual storms; however, given that extreme flooding occurs

infrequently, sea-level rise may be realized before extreme flooding occurs. Tracking sea level rise may, therefore, allow the City to anticipate and act in advance of the projected effects of sea level rise.

Implementing adaptation measures will require coordination, planning, permitting, engineering, and financing. Each strategy will have a certain lead time from initial concept to implementation, which varies depending on the scale and type of strategy, and the amount of SLR that the strategy can accommodate. Once the strategies are prioritized, estimates of lead times can be developed and used to inform actions that serve as a catalyst for the resiliency planning process. Specific, additional near-term actions the City can take to promote local resiliency include the following:

- Continue to track the existing NOAA tide gage in La Jolla that has been operating since 1925 (with published corrections for San Clemente) to track local sea levels, which currently indicates an existing, linear relative rate of sea level rise of 0.26 mm/year, for signals of rapidly accelerating sea level rise.
- Re-establish an ongoing, annual shoreline monitoring program consisting of spring and fall shoreline profile transect monitoring to monitor the health of the City's beaches and to establish baseline conditions now, against which future sea level rise effects can be quantified.
- Integrating long-term shoreline and beach profile data into monitoring programs that include measurable policy timelines / events. Given that a guiding principle is to maintain a walkable beach, beach width should be used as a metric for considering when measures would be implemented. Specific beach-width thresholds will need to be further detailed as part of subsequent monitoring, analysis, and planning.
- Prepare a feasibility study to identify critical erosion hot spots in the City and develop one or more pilot projects that provide multiple benefits in the form of sand retention and ecosystem benefits such as a living shoreline, coastal dune system or cobble berm.
- Establish a regional shoreline management working group to collaborate with interested parties to implement coastal resiliency solutions. Convene a stakeholders meeting in early 2022.
- Submit a grant application to the California Coastal Commission in December 2021 to obtain grant funding to support Coastal Resiliency Plan implementation actions, programs and projects.
- Explore opportunities to establish a geologic hazard abatement district
- Establish a Capital Improvement Program (CIP) fund dedicated to funding coastal resiliency programs and projects and develop dedicated funding source(s).
- Consider re-establishing the City's Opportunistic Beach Sand Placement Program
- Monitoring the frequency of flooding and storm damage. The City will track and keep records of coastal flooding and storm damage events and information. This could be a collaborative effort between City staff and residents in which reports, pictures, and videos are collected. The date, type, location, and severity of flooding (e.g., depth, duration, wave height), and damages can be collated into a file. The intent will be to track the frequency, extent, and severity of flooding to assess if and how the frequency of flooding is increasing. If significant and/or extreme flood events occur, then storm data (e.g., water levels, wave conditions) can be collected, and storm frequencies can be recalculated to quantify the increase in flood risk for comparison against risk-based thresholds.
- Leveraging the unique opportunity of proposed public facilities revitalization initiatives to build adaptive capacity into new and redeveloped City/public infrastructure such as the City's existing Marine Safety Division Headquarters.

## Chapter 11: Report Preparers

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The following individuals and entities contributed to the preparation of this Plan:

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- › Planning Commission
- › Beaches, Parks and Recreation Commission
- › Coastal Advisory Committee
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### **MOFFATT & NICHOL**

- › Aaron Holloway, P.E., Coastal Engineer
- › Chris Webb, Supervisory Coastal Scientist
- › Jake Thickman, Coastal Scientist

### **CALIFORNIA COASTAL COMMISSION**

- › Karen Vu, Statewide Planning Unit
- › Carey Batha, Climate Change Specialist

## Chapter 12: References

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Gallardo-Daly, Cecilia

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From: Campopiano, Jorine  
 Sent: Tuesday, October 12, 2021 8:41 PM  
 To: Gallardo-Daly, Cecilia; Wylle, Samantha  
 Subject: Comments and Recommendations for Draft Coastal Resiliency Plan

Hello - Thank you for considering my comments. I made an extensive list of detailed comments that I didn't want to take the Commissions time reviewing and also the three recommendations for Council prioritization that we voted on at the meeting. Please let me know if you have any follow up questions.

#### GENERAL COMMENTS

1. Executive summary is five pages long. In general this makes it difficult for the reader to really grasp the issues. Can we make it more layperson friendly? We need graphics to really help drive home the issues facing our beaches.
2. Page 3 - "For San Clemente... the dry beach area and the intertidal zone are at risk of permanent loss with rising seas". This should be clarified to include both a timeframe and the beaches at risk. There should be an easy to read table of our beaches and anticipated impacts under the scenarios looked at. What about places our residents care about? Like the Coastal Trail, the Pier, our lifeguard towers etc.... How would those be impacted? How will rising seas impact our surf breaks?
3. Page 4 - The 2050 likely range of SLR is 0.7-1.2 feet. However the SLRVA only looked at impacts 0.8 feet (half the width is gone) and then 3.3 feet (most beaches eroded). At 0.8 feet our beaches lose half their width. What about 1.2 feet? What happens then. There needs to be higher resolution to determine what impacts could occur.
4. Page 5 - OPC 2018 guidance suggests using the upper range of the SLR for critical infrastructure. Under this scenario - the railroad has been relocated. Is this a safe assumption? My understanding is the railroad was proposing on-site solutions.
5. Page 6 - The City Army Corps project is described - but needs detail. This shoreline protection project will pump offshore dredged sand between the areas of Linda Lane and T-Street and restore a beach width of X feet.
6. Page 6 - The word "preferred resiliency strategy". What does that mean?
7. Page 7 - Add in habitat benefits to ecosystem services of sandy beach for intertidal species like shorebirds, grunion, etc...)
8. Page 9 - The Coastal Resiliency plan gives a timeframe of 10-15 years for updates. In keeping with the State OPC framework (they are updating every 5 years), we should update every 5-7 years.
9. Page 13 - Oceanside littoral cell map?
10. San Clemente Opportunistic Beach Fill program - Sand was bought in from the Santa Ana River mouth? Also add in the history of RGP 66. This permit was not renewed by the City.
11. Page 14 - Provide an update on the federal funding for the sand project. The project is called something different throughout the document. Should be consistent. Also briefly describe the project.
12. Page 19 - It says that in the long term sandy beaches will be harder to maintain. What time scale are we talking about? What long-term solutions can be proposed to deal with higher water or are we resolved to losing our beaches in the long term?
13. Page 20 -22 California Coastal Trail, beach access, surfing, and critical public infrastructure (sewer and stormdrains) will be impacted in short-mid term. What can we do as a City to protect? (DEVELOP CIP FOR COASTAL RESILIENCY)
14. Page 26 - Recommendation for beach profile monitoring ...
15. Generally support all recommendations outlined in Chapter 8
16. More discussion needed on the funding piece (separate subcommittee?)

a. Shoreline account

1. Grants
2. GHAD
3. Infrastructure financing district
4. TOT or sales tax
5. Impact Mitigation fees

RECOMMENDATIONS FOR PRIORITIZATION: (VOTED ON AT BPR MEETING)

1. Due to the urgent nature of this issue and to minimize risks and exposure to the City of San Clemente, I recommend that City Council move forward with a feasibility study outlining solutions to retain and build sand on San Clemente beaches, including additional technical analyses, development and assessment of project alternatives and details, conceptual and preliminary engineering design, and cost estimating. The feasibility study should take an ecosystem approach - seeking to enhance and restore the marine/shoreline ecosystem while protecting recreation and shoreline development and infrastructure. Strategies to consider are those outlined in the Draft Coastal Resiliency Plan
  - • Hybrid Living Shoreline
  - • Regional Sediment Management
  - • Sand Retention Structure
  - • Cross-Shore Sand Retention StructuresOffshore multipurpose reefs
2. I to recommend to the City Council that the City reestablish spring and fall beach profile surveys to monitor beach width and install a local tide gage at the San Clemente Pier. This would enable the City to establish baseline conditions now.
3. I recommend to City Council that the City of San Clemente actively coordinate and participate in a Regional Coordination effort to promote essential adaptation strategies and pursue cost-sharing agreements and available state and federal coastal resiliency funding.



Cecilia Gallardo-Daly  
Community Development Director, City of San Clemente  
910 Calle Negocio  
San Clemente CA 92673

November 1, 2022

**Response to City of San Clemente Draft Coastal Resiliency Plan**

Dear Ms. Gallardo-Daly,

As you know, PierPride Foundation is a non-profit group dedicated to preserving and enhancing San Clemente municipal Pier. We thank you for the opportunity to weigh in on the draft Coastal Resiliency Plan. As Commissions and City Council deliberate, here are a few aspects of the plan that seem to be valuable to the community and the Pier.

1. **Creation of a regional taskforce.** Water knows no boundaries. In that spirit, we would applaud an effort where San Clemente leads the cause to create a regional taskforce. It would be an appropriate and highly valuable use of time for a city council person (pp 9, 53).
2. **Pursuit of Prop 68 Funding.** The report indicates there is \$40 mm state funding through CA Department of Fish and Wildlife to protect and enhance community, cultural and visitor centers. PierPride Foundation has a good track record of pursuing State grants. We would welcome the chance to partner with the City to secure Pier-related funding via Prop 68 in 2022 (p. 49).
3. **Creation of a Pierbowl-focussed CIP for storm drain infrastructure to support improved drainage.** PierPride has long wanted a focus on the railroad underpass that connects the Pier to Avenida Victoria. Even recent rains have made the underpass flood. We support this public utilities item as a priority and also would like to work with the City on a larger project that makes the underpass the preferred route to the Pier, versus the at-grade rail alternative (p. 45).
4. **Installation of a Low Tide Gauge at the Pier.** There's a saying that 'how you measure is how you manage.' We support installing a low tide gauge to monitor sea level changes. PierPride is identifying our 2022 fund-raising project and could fund raise for this important tool (p. 53).
5. **Pursue the 50 year sand replenishment plan with State Parks and USACE.** The draft plan presents a compelling and arguably urgent need for this program, and our Foundation is 100% in support. Beaches are the soul of San Clemente and good stewardship is key.

Sincerely,

Eileen Kawas  
PierPride Foundation President

PierPride P.O. Box 73544, San Clemente CA 92673  
501(C)(3) charity, Federal EIN #32-0515984  
[www.pierpride.org](http://www.pierpride.org) 949.422.2943



November 3, 2021

*Sent via email: Gallardo-DalyC@San-Clemente.org*

To: Cameron Cosgrove, Barton Crandell, Steven Camp, Gary McCaughan, Scott McKhann, Karen Prescott-Loeffler, Hannah Tyler, Cecelia Gallardo-Daly

**Re: City of San Clemente Draft Coastal Resiliency Plan**

Dear Planning Commissioners and City of San Clemente Staff,

Thank you for the opportunity to provide comments on the City's Draft Coastal Resiliency Plan. Surfrider Foundation (Surfrider) exists to protect our oceans and coasts in light of threats including those related to climate change, and we have been involved in sea level rise planning processes locally and throughout the State of California for many decades.

As sea level rise becomes more apparent and climate science evolves, the threat facing Southern California has become clear. A 2017 USGS report showed that our region could lose up to two thirds of its beaches by 2100, and the City of San Clemente's Final Sea Level Rise Vulnerability Assessment (SLRVA) similarly determined that areas of San Clemente like North Beach and Mariposa Point will completely erode in just a few decades. San Clemente faces an enormous threat to the future of our coastline.

**Support A Vision that Values Beaches and Recreation**

Fortunately, the City still maintains a window of opportunity to act on these vulnerabilities. Surfrider supports the City in the drafting of a Coastal Resilience Plan as part of its Local Coastal Program Update. We appreciate that the City's stated long-term vision is centered around supporting the public beach including "recreational amenities and related assets," as well as the plan's inclusion of Planning Principles that value wide sandy beaches, beach access, and recreational opportunities. Indeed San Clemente's waves and shoreline are some of our town's most precious assets and the City's adaptation plan should not negatively impact these resources.

**Support Living Shorelines, Armoring Limitations, and Relocation Plans**

Surfrider believes that the City's planning vision and planning principles will be best achieved by a strengthened adaptation plan that more closely addresses the extreme vulnerabilities that the City is facing. Specifically the plan should include a 'trigger-based' framework that helps achieve its planning priorities. Through the actions and timelines currently identified in the plan, it is unclear how the City would be able to maintain walkable beaches in many areas of the City; particularly if the beach nourishment and artificial reef projects suggested as primary adaptation options are not effective or successful in the near future (which we discuss as real concerns in the next section.)

Developing a trigger-based plan will clarify at what point the City may need to take on difficult long-term conversations about relocation, which is identified as an adaptation option in the plan but not applied to any specific area. We encourage the Commission to acknowledge that relocation must be a part of planning in the City where beaches are already eroded in parts most of the year, and to develop a long-term plan for areas like the Railroad all along the entirety of San Clemente's coastline, and Capistrano Shores Mobile Home Park. The Railroad, especially at Cotton's Point and Capistrano Shores and beaches just south of that tract are highly vulnerable 'choke points' where other adaptation options are extremely limited. Embarking on a long-term plan now will help mitigate the tradeoffs to come.

Surfrider would also like to express support for living shorelines and appreciates their incorporation into the plan. As nature-based solutions, living shorelines provide habitat, coastal access, and coastal recreation opportunities while also serving as a buffer for storm surge. We recommend the plan be more specific about where and when living shorelines may be implemented in particular areas such as Mariposa Point and Linda Lane to T Street. These beaches are the most recreated and have the largest potential for living shoreline implementation.

Finally, we strongly encourage the resilience plan to acknowledge the impacts that armoring has had on our beaches. Armoring exists throughout the City including the entire length of the train tracks, in areas such as the Marine Safety Building, and is contiguous at private homesites such as Capistrano Shores Mobile Homes (in that case there is no existing beach as a result of a continuous revetment.) It is well-known and documented that armoring erodes public beaches, and the City should clarify its policies on emergency 'temporary' armoring, which all too often becomes de facto permitted and rarely removed per emergency provisions. Additionally the City should be seeking ways to remove armoring where possible.

#### **Beach Nourishment and Artificial Reefs are Highly Problematic**

Surfrider would like to caution against reliance on beach nourishment as primary sea level rise adaptation strategies. Recent nourishment projects in San Clemente have resulted in gradual sand loss with larger losses occurring very quickly as a result of wave action and larger storms. This is not surprising as recent research has highlighted the ineffectiveness of major nourishment projects — a 2018 study of projects in San Diego County conducted by scientists at the Scripps Institution of Oceanography showed how some projects were largely washed away within just one season. Additionally, larger regional beach nourishment projects like the Coastal Storm Damage Reduction Project in San Diego have taken almost two decades to materialize since their original concept was introduced.

Large-scale beach nourishment projects are not only expensive and at times ineffective, they also have the potential to harm our City's important wave resources by burying reefs. San

Clemente is home to some of the most pristine surf waves on the West Coast of North America. We cannot rely on 'band-aid' sea level rise solutions that could in the meantime bury waves like Trestles, Cottons and Churches. Surfrider suggests wave preservation be a top priority in adaptation planning perspectives.

Further, the plan identifies beach nourishment costs of more than \$87 million over a span of 50 years; but sand is already becoming more difficult and expensive to source. It is impractical to make this estimate and hinge the future of our beaches on a resource that is becoming less reliable and much higher in demand.

Finally, the Adaptation Plan also suggests explorations into an artificial reef. Artificial reefs are highly controversial because they typically entail high recreational, ecological, and financial costs. The last artificial reef approved and permitted by the California Coastal Commission was the Wheeler North Reef Expansion Project, which has never met its performance standards since the first phase of inception in 2008.

#### **Conclusion**

Surfrider appreciates the Planning Commission's leadership in adapting San Clemente's precious coastline to sea level rise. We strongly encourage this Commission to direct City Staff to develop a trigger-based framework for the plan that includes more specificity around the need to explore living shoreline solutions in the near-term, the development of long-term relocation plans, and the limiting of shoreline armoring. Specifically, we support the living shoreline hybrid solution mentioned in the plan, and identify Capistrano Shores Mobile Home Park and sections of the Railroad as areas in need of long-term relocation plans.

We caution the City to properly evaluate the pitfalls of beach nourishment and artificial reefs; which have been too relied upon in the current draft plan. San Clemente will not accept adaptation solutions that destroy our world-class waves and beaches, and we recommend this be a top consideration when prioritizing options. We appreciate your consideration of these comments and look forward to working with you.

Sincerely,

Laura Walsh  
California Policy Manager  
Surfrider Foundation

Denise Erkeneff  
Chapter Coordinator  
Surfrider Foundation South Orange County Chapter

Gallardo-Daly, Cecilia

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**From:** ALTON CULLEN <7aycullen@sbcglobal.net>  
**Sent:** Sunday, November 07, 2021 4:58 PM  
**To:** Gallardo-Daly, Cecilia  
**Subject:** San Clemente Draft Coastal Resiliency Plan

Hi Cecilia,

I pretty much agree with the plan as presented; however, I feel that it will be outdated by the time it is approved by the Coastal Commission. My reasoning is that the numbers are taken from about three years ago and I understand that the Commission is studying revising the numbers upward due to the increased heat, melting of the ice and more extreme weather factors which will particularly impact SC and the north end of town.

The Shorecliffs community is researching armoring methods. Have you or your consultant gone into the ways available such as placing structures on stilts, baskets with rocks and/or barriers placed away from the structure toward the ocean? Will you have authority under this plan to issue or deny permits for armoring either on an emergency basis or before the property is affected?

Thank you for providing me the information.

Al



## Gallardo-Daly, Cecilia

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**From:** Susan Ambrose <ambroses2@aol.com>  
**Sent:** Thursday, November 18, 2021 10:11 PM  
**To:** Gallardo-Daly, Cecilia  
**Cc:** Campopiano, Jorine; sambrosemail@gmail.com  
**Subject:** Invited Input - DRAFT Coastal Resiliency Plan - Page 1

November 18, 2021

Cecilia Gallardo-Daly  
Community Development Director  
City of San Clemente  
910 Calle Negocio  
San Clemente, CA 92673

Dear Cecilia,

Thank you for putting out the Draft Coastal Resiliency Plan out for public review at this time in history where the effects of rising seas, warmer water, and severe storms have caused major coastal and infrastructure damage to shoreline beaches and waterways, harbors, habitats, villages, towns, and cities beyond anyone's imagination. Climate Change worldwide has and will further affect housing, transportation, business operations, and the economic market.

Spawned by the Local Coastal Program (LCP), the Coastal Resiliency Plan will provide a framework to implement the recommendations of its companion document, the Sea Level Rise Vulnerability Assessment, for strategies and programs to plan and promote long term coastal resiliency for our City. In addition, the Plan will address the City's short term and long term vision and goals with forward thinking to protect and preserve the integrity of our most important natural resources - our shoreline and coastal sandy beaches, our coastal zone, and the infrastructure that support the related recreational amenities that contribute to a growing healthy economy.

The City Council approval of The Coastal Resiliency Plan could also advance and create timely opportunities to collaborate and work with other affected Local, County, and Regional governments, agencies, and organizations to brainstorm and develop cost saving ideas & solutions to problems caused by Climate Change factors. Envision teams of people with specific issue training, expertise, and strengths be it finance and funding ( money going out and donations coming in); environmental safety; transportation; infrastructure; water quality; on shore, off shore, or cross-shore retention structures; living shorelines and native plants; sand and sediment locations and management - each team tackling different specific coastal resiliency challenges. Then coming together and each team sharing their ideas, strategies, plans, and programs with all of the teams for feedback, input, and progressive implementation. What's that old phrase - Teamwork makes the Dream Work! Yes it does!

Speaking of teams, I congratulate you and think you and your team have done a wonderful job with your Draft product. I am not going to suggest specific items to add to or amend or modify, but rather I am going

## Gallardo-Daly, Cecilia

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**From:** Susan Ambrose <ambroses2@aol.com>  
**Sent:** Thursday, November 18, 2021 10:20 PM  
**To:** Gallardo-Daly, Cecilia  
**Cc:** Campopiano, Jorine; sambrosemail@gmail.com  
**Subject:** Invited Input - DRAFT Coastal Resiliency Plan - Page 2

November 18, 2021

Ambrose Letter Continued, Page 2

to support and endorse the Plan in general and support and endorse the larger picture of 3 priorities that was offered by Beaches, Parks, and Recreation Commissioner Jorine Campopiano (a past valued member and officer of the Coastal Advisory Committee) to the Beaches, Parks, and Recreation Commission and to you Cecilia during the October 12th BP&R Commission Meeting after your presentation of the Draft and request for input or comments from the Commissioners.

I support and endorse the following 3 suggested priorities for the Draft Coastal Resiliency Plan written by Commissioner Campopiano for consideration by you and by the BP & R Commission - BP & R Commission unanimously voted to support these recommendations, you invited her to formally submit them in writing to you:

### RECOMMENDATIONS FOR PRIORITIZATION:

1. Due to the urgent nature of this issue and to minimize risks and exposure to the City of San Clemente, I recommend that the City Council move forward with a feasibility study outlining solutions to retain and build sand on San Clemente beaches, including additional technical analyses, development and assessment of project alternatives and details, conceptual and preliminary engineering design, and cost estimating. The feasibility study should take an ecosystem approach - seeking to enhance and restore the marine/shoreline ecosystem while protecting recreation and shoreline development and infrastructure. Strategies to consider are those outlined in the Draft Coastal Resiliency Plan:

- Hybrid Living Shoreline
- Regional Sediment Management
- Sand Retention Structure
- Cross-Shore Sand Retention Structures
- Offshore Multipurpose Reefs

2. I recommend to the City Council that the City reestablish Spring and Fall beach profile surveys to monitor beach width and install a local tide gauge at the San Clemente Pier. This would enable the City to establish baseline conditions now.

**Gallardo-Daly, Cecilia**

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**From:** Susan Ambrose <ambroses2@aol.com>  
**Sent:** Thursday, November 18, 2021 10:22 PM  
**To:** Gallardo-Daly, Cecilia  
**Cc:** Campopiano, Jorine  
**Subject:** Invited Input - DRAFT Coastal Resiliency Plan - Page 3

November 18, 2021

Ambrose Letter Continued, Page 3

3. I recommend to City Council that the City of San Clemente actively coordinate and participate in a Regional Coordination effort to promote essential adaptation strategies and pursue cost-sharing agreements and available state and federal coastal resiliency funding.

I look forward to your City Council presentation in December and plan to attend. In addition, I will help pass the word to SC citizens so they can hear the positive actions the City can initiate in support of Coastal Resiliency efforts. Protecting and conserving our coastal natural resources are critical to our economic and community vitality and our living up to and maintaining our City's iconic label of San Clemente, Village by the Sea. I hope you too will take the opportunity to announce this important presentation to the community on our City Website, City Facebook, SC Times, and other social media. Great work Cecilia!

Thank you,

Susan Ambrose, Chair  
Past Coastal Advisory Committee

FRED GAINES  
SHERMAN L. STACEY  
LISA A. WEINBERG  
REBECCA A. THOMPSON  
NANCI S. STACEY  
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November 18, 2021

By Email and Mail

Cecilia Gallardo-Daly  
Community Development Director  
City of San Clemente  
910 Calle Negocio  
San Clemente, CA 92673

Re: Coastal Resiliency Plan

Dear Ms. Gallardo-Daly:

This office represents Capistrano Shores, Inc. ("CSI"), the owner of the Capistrano Shores Mobile Home Park ("Capistrano Shores") at 1880 N. El Camino Real, San Clemente. We have reviewed the draft Coastal Resiliency Plan (the "Plan") which has been published by the City. As you are undoubtedly aware, Capistrano Shores fronts along the shoreline for a distance of approximately  $\frac{3}{4}$  of a mile extending northwest from the storm drain underneath the Metrolink Station. We have the following comments concerning the Plan.

1. The Plan Does Not Encompass the CSI Property.

The Plan identifies a North Reach, Central Reach and South Reach to which the Plan applies. None of these areas encompasses Capistrano Shores. (See Plan Figure 4.1, 4.2.) CSI concludes that the policies contained in the Plan would not be intended to apply to Capistrano Shores. The Plan would not limit or restrict any of the present uses nor affect what future uses may be made of the CSI Property. CSI does not seek for the Plan to include Capistrano Shores. However, as set forth below, Capistrano Shores should not be prevented from protection of its property by policies which are described in the Plan.

2. Capistrano Shores is not Identified as a Resource Category Potentially Vulnerable to Sea Level Rise.

On pages 19 through 25 of the Plan, there is a listing of 16 distinct "Resource Categories Vulnerable to Sea Level Rise". The private residential use at Capistrano Shores is not among this list. The Plan does identify private blufftop structures and infrastructure (pages 23-24), The

Lossan Rail Corridor (pages 22-23) which is protected by Capistrano Shores for its ¾ mile length. Public roadways like El Camino Real (page 24) are also protected by Capistrano Shores.

However, Capistrano Shores is subject to the same ocean forces that affect other areas of the City. Despite the lack of application of the Plan to Capistrano Shores, CSI wishes to be assured that policies which might be applied in other areas to relocate facilities cannot be applied to Capistrano Shores. The City may choose to relocate any facilities which it owns but CSI cannot be forced to apply some policy within the Plan to “relocate” its improvements. Capistrano Shores has no land to which “relocation” could be accomplished. For Capistrano Shores “relocation” is a euphemism for destruction.

3. Beach Enhancement Alternatives in the Plan Should Also be Available to Capistrano Shores.

The Plan includes several strategies for beach nourishment with sand including a Winter Storm Berm Program (page 32); the US Army Corps of Engineers Coastal Storm Damage Reduction project, a beach sand nourishment project (page 32-34); Hybrid Living Shoreline (page 34-37); sediment management (page 37-38); and sand retention structures (page 38-41). To the extent that any of these alternatives are available for the protection of the City property, they should also be available to the protection of private property such as Capistrano Shores.

4. Impact of Storm Drain on Capistrano Shores.

At the south end of Capistrano Shores, the City maintains a large storm drain. This storm drain causes the sand adjoining and in front of Capistrano Shores to erode. The City should take responsibility for the erosion of beach sand in this location and provide mitigation for this loss. Redirection of the outflow away from Capistrano Shores and replacement of the sand eroded away by the storm drain should be included in the Plan. At this time, Capistrano Shores protects its property from the storm drain erosion with a rock revetment.

5. The Plan Fails to Provide Reasonable Protection Alternatives.

The Plan states that it contains adaptation strategies that include “Protect”, “Accommodate” or “Retreat” strategies. (page 5). Yet the Plan does not include any Protect strategies that would involve the construction or improvement of seawalls to protect existing development. There is a fleeting reference on page 7 that “[p]rotection strategies refer to those strategies that employ some sort of engineered structure or other measure to defend development (or other resources) in its current location without changes to the development itself.” (citing CCC 2018 Sea Level Rise Guidance.)

When describing the “Priority Measures for Resources and Assets” (pages 30-42), no mention is made of improvements to existing seawalls as a measure to be applied. Seawalls are an integral part of shoreline management and protection. Seawalls are expressly permitted by

Section 30235 of the Coastal Act to protect existing structures in danger from erosion. Yet seawalls are entirely absent from the Plan's management strategies.

An existing rock seawall protects the Metrolink railway line along a majority of its 4.6 mile section through the City of San Clemente. The Metrolink railway line is protected for the  $\frac{3}{4}$  mile section along Capistrano Shores by the seawall which protects Capistrano Shores. Maintenance and enhancement of these seawalls should be identified as a strategy for the protection of these resources along with the winter storm berm program (page 44), Hybrid Living Shoreline/Dune System (page 44), sediment management (page 45), and sand retention structures (page 45). We do note that "seawall" is mentioned as a single word for alternatives considered for protection the Metrolink railway line (page 33). But the chosen alternative is beach nourishment under an as yet unfunded federal program and enhancing the protective seawall is not further mentioned in the Plan.

Omitting seawalls from any sea level rise resiliency strategy abandons the most effective method yet devised to protect public and private resources. Although the most severe projections suggest that at some distant date in the future, seawalls would be inadequate to protect resources, it is more likely that the most severe projections will not arise and that protection of public and private resources through construction, maintenance and enhancements of seawalls will be the most economic manner in which to proceed for the balance of the 21<sup>st</sup> century.

6. Monitoring for Sea Level Rise Should Begin Today by Comparing Actual Sea Level Rise to the 2018 Coastal Commission and 2018 Ocean Protection Council Projections.

Although the Plan claims to require monitoring of sea level rise, CSI would note that the sea level rise projections contained in the Coastal Commission 2018 Sea Level Rise Guidance were developed from data from 2000 to 2012. Both the Coastal Commission 2018 Sea Level Rise Guidance and the 2018 Ocean Protection Council Sea Level Rise Guidance rely upon Kopp, R.E., R.M. Horton, C.M. Little, J.X. Mitrovica, M. Oppenheimer, D.J. Rasmussen, B.H. Strauss, and C. Tebaldi, 2014: Probabilistic 21st and 22nd century sea-level projections at a global network of tide-gauge sites. *Earth's Future*, 2, no. 8, 383-406 ("Kopp, et al. 2014"). Although Kopp adopts a different methodology for sea level rise projections, the data upon which those projections are developed remain the same.

Kopp utilizes the year 2000 as a baseline. In the year 2030, the medium high risk aversion (0.5% chance of probability) projects 0.8 feet of sea level rise. At the end of 2021, 68% through the time period projection, observed sea level rise on the California coast has been less than 0.2 feet. If the Kopp projections adopted as the basis for California policy were correct, actual data has shown that the projection exceeds by more than 2  $\frac{1}{2}$  times what has been observed. Actual sea level rise has been below the median probabilistic projections based on Kopp et al.2014.

Cecelia Gallardo-Daly  
City of San Clemente  
November 18, 2021  
Page 4

To continue to use projections which are so far removed from reality as a public planning tool will distort public and private investment. Destruction of public and private assets in anticipation of sea level rise that does not occur is wasteful. Removal or relocation of public and private assets which could economically be protected is not a good strategy. The Plan should include a more robust alternative of protection of pre-existing assets.

7. Conclusion.

CSI asks the City Council to consider these comments in its evaluation of the Plan. CSI is rightfully concerned that policies which are adopted with regard to City property will ultimately be applied to Capistrano Shores. CSI objects to any policy which would limit its legal right to maintain and protect its property.

Very truly yours,

*Sherman L. Stacey*

SHERMAN L. STACEY

SLS/sh

cc: Mark Howlett  
Eric Anderson  
Sue Loftin, Esq.

**CALIFORNIA COASTAL COMMISSION**

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November 18, 2021

City of San Clemente  
c/o Summit Environmental Group  
Attn: Leslea Meyerhoff  
[leslea.meyerhoff@att.net](mailto:leslea.meyerhoff@att.net)

**Re: Coastal Commission Staff Comments on the City of San Clemente Draft Coastal Resiliency Plan – October 2021 Draft**

Dear Ms. Meyerhoff,

Thank you for the opportunity to comment on the October 2021 public review draft of the *City of San Clemente Coastal Resiliency Plan* (Plan). The draft Plan is a deliverable for Task 1 of the City of San Clemente's LCP Local Assistance Grant, LCP-18-05. We appreciate the City's efforts to prepare and plan for current and future coastal hazards in the face of sea level rise and look forward to continuing to work together on these issues. We provide the below comments for your consideration in finalizing the document.

- 1. Risk aversion and SLR scenarios.** We appreciate that the Plan included additional information on risk aversion scenarios as described in the 2018 OPC Sea-Level Rise Guidance. We recommend adding additional clarifying information to the Executive Summary regarding the different scenarios and how to select and evaluate specific sea level rise scenarios for different projects. Adding this language may provide further information to the City's residents and potential developers on evaluating the potential sea level rise risks associated with a specific project as well as aid in planning and designing a project that can be as safe as possible from sea level rise and coastal hazards. We suggest incorporating the language from the Coastal Commission's 2018 Sea Level Rise Policy Guidance shown below:

*Low risk aversion scenario: may be used for projects that would have limited consequences or have a higher ability to adapt, such as sections of unpaved coastal trail, public accessways, and other small or temporary structures that are easily removable and would not have high costs if damaged.*

*Medium-high risk aversion scenario: should be used for projects with greater consequences and/or a lower ability to adapt such as residential and commercial structures.*

*Extreme risk aversion (H++): should be used for projects with little to no adaptive capacity that would be irreversibly destroyed or significantly costly to repair, and/or*



*would have considerable public health, public safety, or environmental impacts should that level of sea level rise occur. In the Coastal Commission's jurisdiction, this could include new wastewater treatment plants, power stations, highways, or other critical infrastructure.*

We also recommend modifying the second row of Table 4-1 to better reflect different risk aversion scenarios, coupled with a narrative explanation in the section below outlining how the approach can be used to contextualize the risk to assets that is presented in this section. For more information about risk aversion, you may consult the [Commission's 2018 SLR Guidance](#)<sup>1</sup>.

2. **Include recommendations on adaptation strategies for Capistrano Shores in Next Steps.** The Plan notes that Capistrano Shores has been excluded from the Study area for the North Reach, however, given this area's high degree of vulnerability to SLR, we recommend that Chapter 10 includes a discussion on how the City may prioritize planning for Capistrano Shores as an important next step in the City's overall sea level rise adaptation strategy. This discussion may include current and potential adaptation strategies for Capistrano Shores tailored to consider the particular constraints of the site (e.g., the rail corridor, beach width, ingress/egress, public access, etc.) We also recommend that the next steps include a timeframe for planning and implementation that is reflective of projected SLR vulnerability at this site, and includes coordination between interested parties and agencies, plans for community outreach and education, etc.
3. **Expand socioeconomic impacts and environmental justice analysis.** We acknowledge that a thorough, quantitative analysis of social vulnerability and environmental justice considerations may be beyond the scope of this Plan; however, we do recommend building on the Socioeconomic Impacts and Environmental Justice section on page 25's discussion on the need for additional coastal access easements and rail considerations that will be affected by SLR and coastal hazards in the area. This analysis could draw on readily available information and could include qualitative answers to the following questions:
  - a. What populations (including residents and non-residents such as workers and tourists) could be affected by coastal hazards in the planning area? We appreciate the Plan's reference to the Commission's adopted EJ policy and recommend providing additional information about SLR impacts for people with disabilities, elderly, youth, low-income, BIPOC, non-English speakers, single family households, homeless, and refugees. Outreach to local EJ groups, such as members of the California Environmental Justice Alliance (CEJA) may assist in identifying and performing outreach.
  - b. How might these populations be affected if they are directly exposed to coastal hazards (i.e., live in hazards areas) or indirectly exposed (i.e., depend on roads or other infrastructure exposed to hazards)? A more comprehensive assessment could also include some description of how the City's conditions compare to the rest of the region and how their vulnerabilities may be linked. Vulnerable populations

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<sup>1</sup>[https://documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdootedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdootedSLRGuidanceUpdate.pdf)

outside of the coastal zone or San Clemente could be affected by development and other land use changes in the City; thus, we recommend adding additional narrative that places San Clemente within the context of the larger region. Relatedly, coastal resources and amenities in San Clemente are utilized by all people who also do not live in the area. We recommend the Plan expand on this and explain how people who do not live in the planning area interact with the City and would be directly or indirectly impacted by SLR vulnerabilities, particularly those who are from low-income areas and communities of color.

- c. Are there some populations in the planning area (either residents or non-residents) that already or could face a larger burden of environmental hazards than other groups? How might these vulnerabilities be prioritized in the next stage of adaptation planning? For example, environmental justice communities already face existing environmental hazard and pollution burdens that will be exacerbated by climate change and sea level rise, and these cumulative impacts should be considered. Consider using CalEnviroScreen to identify communities with existing burdens located within and nearby the City's coastal zone. If time and resources allow for additional analysis, identify what indicators rank high for the community. Individual indicator maps can be accessed [here](#)<sup>2</sup>.
- d. What are some of the key vulnerabilities for each group that should be considered for the next steps in adaptation planning? For example, existing environmental justice communities face high environmental burdens from exposure to poor water quality. This might be exacerbated when coastal hazards affect water treatment systems.
- e. As SLR causes beaches to narrow and disappear, demand for beach access at the remaining beaches will increase. How will potential beach loss in this region, accelerated by SLR, affect the availability of residents and non-residents to access the beach in San Clemente? What steps can the City take to reduce any disparities in coastal access for non-residents? What parts of the City are projected to lose and keep beaches looking forward? What do coastal access resources such as trails, visitor-serving amenities, public parking, EV charging stations, bike racks, and other mixed-modal facilities look like in areas that are projected to have beaches? How can the Plan inform the City's prioritization for the future Capital Improvement Program (CIP)?

We also recommend adding additional information to the tables in Chapter 7 regarding any potential resource/asset benefits as well as adverse impacts specifically to surrounding environmental justice communities. Any adaptation planning decision, such as siting of infrastructure or project financing mechanisms, may disproportionately burden environmental justice communities if the project or plan does not actively avoid or minimize the adverse impacts in these communities nor engage them in the process. We recommend carefully evaluating environmental justice impacts of adaptation projects and

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<sup>2</sup><https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9a9fe40d/>

describe in the Community Outreach and Involvement Section in Chapter 3 whether any meaningful engagement with environmental justice communities was conducted. If not, we suggest including a description of how the City plans to build on its engagement efforts with environmental justice communities into Chapter 10 – Next Steps.

4. **The H++ Scenario.** The Plan references feedback that the City's SLRVA did not assess potential impacts to critical infrastructure under an H++ scenario. As noted in the Plan, the Ocean Protection Council's (OPC) March 2018 State of California Sea-Level Rise Guidance recommends the H++ scenario be considered for critical infrastructure and other high stakes, long-term decisions. These include projects and planning decisions with little to no adaptive capacity that would be irreversibly destroyed or significantly costly to repair, and/or would have considerable public health, public safety, or environmental impacts should that level of SLR occur. We acknowledge that this Plan has a different scope than the City's SLRVA, and that existing SLR planning decision-support tools may not be well equipped to analyze the 10ft by 2100 H++ scenario. However, we recommend building on the Plan's current SLR projection analysis to gain a better understanding of what H++ might look like for San Clemente through some additional qualitative analysis. For example, the Plan notes that critical infrastructure may be threatened with 3.3ft of SLR, and Table 4-1 notes certain timeframes associated with the Low Risk aversion scenario. But, under H++, we might see similar levels (3.8ft) by 2060 or sooner. Thus, we recommend including a brief qualitative discussion of how we may see some vulnerabilities emerge sooner under these conditions, and as a result, how this might influence the City's adaptation planning strategy selection and implementation for its vulnerable assets. Within this we also recommend including specific discussion of the City's key critical infrastructure and where vulnerabilities to that infrastructure emerge under H++ conditions. In particular, we recommend the Plan identify the responsible entities within the City (or in collaboration with external entities) who are responsible for monitoring SLR conditions, proposed triggers reflecting adequate lead time for funding, planning, and permitting.
5. **Expand the Additional / Proposed Strategies Section.** Coastal staff appreciates the detail associated with many of the strategies in Chapter 7, as outlining in Tables 7-1 through 7-6. Most of these strategies, with the exception of Storm Drain and other Public Utility System Improvements can be understood to focus largely on sediment management. Given the strong focus on this approach, we recommend including a discussion about the expected SLR thresholds under which these approaches could be effective (near- to mid-term), and further including additional strategies for the long term. We recommend expanding the section called "Additional / Proposed Strategies for Consideration in the City" on page 43 to also include non-sediment focused adaptation strategies that the City may consider including repetitive loss policies, development standards, land use/zoning recommendation, conditions of approval, etc. We also recommend expanding on the proposed SLR and coastal hazard monitoring program by describing which entities within the City would be responsible, identifying existing data sources, anticipating potential funding needs (e.g., for seasonal beach surveys), and any resulting planning or implementation triggers that would be tied to such monitoring.

6. **Nature-based adaptation strategies.** The Coastal Commission recently released a memo on nature-based adaptation strategies. This introductory-level memo aims to inform local government planners on important aspects of nature-based projects that Coastal Commission staff may encounter when evaluating these types of projects. Importantly, the memo indicates that the Commission identifies nature-based adaptation strategies as projects that offer both protection services from coastal hazards as well as ecological benefits. Because the City's Plan recognizes that nature-based adaptation strategies will be an important tool to improving the City's resilience to sea level rise, we recommend that the Plan also recognize and discuss how the City's pursuance of nature-based adaptation strategies (such as the proposed Hybrid Living Shoreline/Beach Sand Dune Complex) will prioritize ecological benefits and outcomes in addition to the protection benefits. Sandy beaches and dune systems are an important coastal habitat for many animal and plant species, and may be able to improve the abundance and resilience of the City's coastal resources as well as offer protection to built coastal structures. Therefore, we recommend including a discussion on how maintenance and monitoring needs will include ecological success metrics.
7. **Include maps and figures.** We recommend adding additional maps that illustrate where the existing and ongoing adaptation strategies are being implemented and where proposed adaptation strategies may be most appropriate. We also recommend adding figures that demonstrate what the Winter Storm Berm Program looks like as well as what the USACE Coastal Storm Damage Reduction Project is proposed to look like. We understand that the City's Sea Level Rise Vulnerability Assessment included a number of maps and figures, and it may be appropriate to insert or link to these figures in an effort to reduce redundancy with adding maps to the Plan.
8. **Insert links to studies and guidance documents.** The Plan references a variety of studies and guidance documents throughout the report, including the 2018 Coastal Commission Sea Level Rise Policy Guidance, Orange County Rail Infrastructure Defense Against Climate Change Plan, and USACE's San Clemente Shoreline Feasibility Study. We recommend inserting links to the documents mentioned in this Plan whenever possible, either directly in the report as footnotes or within the main text in order to provide more easily accessible information to readers.

Again, thank you for the opportunity to review this draft. Coastal Commission staff are available to discuss these comments further at any time.

Sincerely,

Karen Vu  
Statewide Planning

cc: Liliana Roman (CCC)  
Shannon Vaughn (CCC)

Madeline Cavalieri (CCC)  
Karl Schwing (CCC)  
Cecilia Gallardo-Daley (City of San Clemente)

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE, CALIFORNIA, TO ADOPT THE COASTAL RESILIENCY PLAN AND AUTHORIZE THE SUBMITTAL OF THE COASTAL RESILIENCY PLAN TO THE CALIFORNIA COASTAL COMMISSION TO RECEIVE AND FILE AS A FINAL LOCAL COASTAL PROGRAM PLANNING GRANT DELIVERABLE

WHEREAS, on February 8, 2018, the California Coastal Commission (CCC) approved a comprehensive update to the City of San Clemente's Local Coastal Program (LCP) Land Use Plan (LUP) with suggested modifications (Major LCP Amendment No. 1-16 (LCP-5-SCL-16-0012-1)); and

WHEREAS, at public hearing on June 12, 2018, the City Council adopted Resolution No. 18-19 approving the comprehensive LUP update; and

WHEREAS, on August 10, 2018, the Executive Director of the California Coastal Commission effectively certified the City's comprehensive LUP update; and

WHEREAS, the City has also completed a Sea Level Rise Vulnerability Assessment (SLRVA) which was adopted by the City Council under Resolution 19-41 and submitted to the CCC in December 2019; and

WHEREAS, the City was awarded an additional LCP Planning Grant to assist in the preparation of a Coastal Resiliency Plan as a companion document to the SLRVA which builds on the findings and recommendations contained in the City's 2019 SLRVA; and

WHEREAS, the City developed the Draft Coastal Resiliency Plan over a two year period from 2019 through 2021 and completed a Draft Coastal Resiliency Plan in October 2021; and

WHEREAS, the Coastal Resiliency Plan was made available for public review and comment beginning on October 7, 2021 through November 18, 2021, which is a requirement of formal acceptance of the Coastal Resiliency Plan by the CCC; and

WHEREAS, on October 7, 2021 the City published a Notice of Availability of the Draft Coastal Resiliency Plan, issued an E-Blast, issued a press release and mailed a public notice of availability to all individuals and agencies on the City's master LCP mailing list; and

WHEREAS, City Staff presented the Draft Coastal Resiliency Plan to the City's Beaches Parks and Recreation Commission as an informational item on October 12, 2021; and

WHEREAS, City Staff presented the findings and recommendations contained in the Draft Coastal Resiliency Plan to the City's Planning Commission on November 3, 2021; and

WHEREAS, a total of seven comment letters and emails were received by the City during the six-week public review period on the Draft Coastal Resiliency Plan; and

WHEREAS, in response to public comments on the Draft Coastal Resiliency Plan staff prepared a revised (final) version of the Coastal Resiliency Plan in November 2021 to reflect the input and integrate the comments from stakeholders; and

WHEREAS, the Coastal Resiliency Plan is an element of the City's LCP and preparation and adoption of an LCP, and amendments thereto, is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15265 because the criteria under the Coastal Act are the functional equivalent of the EIR process; and

WHEREAS, on December 7, 2021, the City Council of the City of San Clemente held a duly noticed public hearing on the Coastal Resiliency Plan, considered written and oral comments, and facts and evidence presented by City staff, and other interested parties and stakeholders; and

WHEREAS, the City Council of the City of San Clemente acknowledges that the Coastal Resiliency Plan and LCP will be carried out in a manner fully consistent with the Coastal Act; and

NOW, THEREFORE, The City Council of the City of San Clemente does hereby resolve as follows:

Section 1. Incorporation of Recitals.

The City Council hereby finds that all of the facts in the Recitals are true and correct and are incorporated and adopted as findings of the City Council as fully set forth in this resolution.

Section 2. CEQA Findings.

Based upon its review of the entire record, including the Staff Report, any public comments or testimony presented to the Planning Commission, and the facts outlined below, the City Council hereby finds preparation and adoption of a LCP, and amendments thereto, and the Coastal Resiliency Plan as a component of the City's LCP, is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15265. The LCP process is exempt because the criteria under the Coastal Act are the functional equivalent of the EIR process.

Section 3. City Council Action

Based on the entire record before the City Council, all written and oral evidence presented to the City Council, and the findings made and evidence discussed in the staff report and this Resolution, the City Council hereby directs City Staff to submit the Final Coastal Resiliency Plan to the California Coastal Commission as the final work product of the City's CCC Round 5 LCP Planning Grant.

PASSED, ADOPTED and signed this 7<sup>th</sup> day of December, 2021.

ATTEST:

\_\_\_\_\_  
City Clerk of the City of  
San Clemente, California

\_\_\_\_\_  
Mayor of the City of  
San Clemente, California

STATE OF CALIFORNIA )  
COUNTY OF ORANGE ) §  
CITY OF SAN CLEMENTE )

I, JOANNE BAADE, City Clerk of the City of San Clemente, California, do hereby certify that Resolution No. \_\_\_\_\_ was adopted at a regular meeting of the City Council of the City of San Clemente held on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by the following vote:

AYES:

NOES:

ABSENT:

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
CITY CLERK of the City of  
San Clemente, California

Approved as to form:

\_\_\_\_\_  
City Attorney



RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
SAN CLEMENTE, CALIFORNIA, AUTHORIZING  
SUBMITTAL OF AN APPLICATION TO THE CALIFORNIA  
COASTAL COMMISSION FOR A LOCAL COASTAL  
PROGRAM GRANT TO SUPPORT COASTAL RESILIENCY  
PLAN IMPLEMENTATION

WHEREAS, the Budget Act of 2013 provided an appropriation of \$1 million for a first round of Coastal Commission grants in FY 13-14 to local governments to support Local Coastal Program (LCP) planning, and

WHEREAS, on April 24, 2014, the City of San Clemente received a grant of \$90,000 for the City to re-initiate efforts toward certification of an Local Coastal Program; and

WHEREAS, on February 2, 2016, the City Council approved an update to the City's Coastal Land Use Plan which was submitted to the Coastal Commission, approved with suggested modifications by the Coastal Commission on February 8, 2018, approved by the City Council on June 12, 2018 and certified by the Coastal Commission on August 10, 2018, and

WHEREAS, on January 3, 2017, the City of San Clemente received a second grant of \$135,000 for the City to continue efforts to develop a Local Coastal Program and prepare a Sea Level Rise Vulnerability Assessment; and

WHEREAS, the City completed its Sea Level Rise Vulnerability Assessment in 2019 and continued to make progress on its certified LCP efforts; and

WHEREAS, in January 2019 the City was awarded a third Coastal Commission grant in the amount of \$75,000 to assist the City in preparing a Coastal Resiliency Plan and continue efforts to develop the LCP Implementation Plan; and

WHEREAS, in December 2021 the City completed the Coastal Resiliency Plan and conducted a public hearing before the City Council on December 7, 2021 and has made substantial progress on the Draft LCP Implementation Plan; and

WHEREAS, the Coastal Commission has announced a new round of LCP grant funding to be available in 2022 to support local government coastal resiliency efforts. Funding is provided by the Budget Act of 2021, which appropriates \$31 million to the Coastal Commission to provide grants to local governments for projects that are designed to assist local governments in assessing impacts and planning for coastal resiliency; and

WHEREAS, the City desires to implement recommendations contained in the 2021 Coastal Resiliency Plan which could be assisted by Coastal Commission grant funding (i.e., Round 7 Grants) available for a grant term through December 31, 2025; and

WHEREAS, the City of San Clemente has a certified Land Use Plan that was comprehensively updated in 2018 and the City will have a public review draft LCP Implementation Plan (IP) in early 2022 which is anticipated to be submitted to the Coastal Commission by March 31, 2022 per the terms of the third CCC Grant, and

WHEREAS, the City of San Clemente has made significant progress toward LCP certification by the California Coastal Commission which will result in the City assuming permit issuing authority in the Coastal Zone, as provided under State law; and

WHEREAS, the City intends to submit an application for a fourth CCC Grant in December 2021 building on the successful efforts supported by three previous grants; and

WHEREAS, the City will also utilize in-kind staff and contractor time as a source of matching funds to increase the competitiveness of the City in the grant award process; and

WHEREAS, San Clemente does not yet have an effectively certified LCP; and

WHEREAS, San Clemente desires to pursue a project that would result in the completion and submittal for certification by the California Coastal Commission of an Amendment to the LCP; and

WHEREAS, San Clemente commits to and agrees to fully support a planning effort intended to [complete or] amend a certified LCP pursuant to the provisions of the California Coastal Act, with full public participation and coordination with the Coastal Commission staff.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of San Clemente hereby:

Section 1. Directs San Clemente staff to submit a grant application package to the California Coastal Commission to provide financial and planning assistance, under authority of the California Coastal Act, in the amount of up to \$500,000 to fund the project more particularly described in the grant application package.

Section 2. Authorizes the Community Development Director, of the City of San Clemente, to execute, in the name of the San Clemente, all necessary applications, contracts and agreements and amendments thereto to implement and carry out the grant application package attached hereto and any project approved through approval of the grant application.

Section 3. The Mayor of the City of San Clemente shall sign this Resolution and the City Clerk shall attest and certify to the passage and adoption of this Resolution and it shall become effective at the time(s) specified above and in accordance with applicable law.

Section 4. The City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

PASSED, ADOPTED and signed this 7th day of December, 2021.

ATTEST:

\_\_\_\_\_  
City Clerk of the City of  
San Clemente, California

\_\_\_\_\_  
Mayor of the City of San  
Clemente, California

STATE OF CALIFORNIA            )  
COUNTY OF ORANGE            ) §  
CITY OF SAN CLEMENTE         )

I, JOANNE BAADE, City Clerk of the City of San Clemente, California, do hereby certify that Resolution No. \_\_\_\_\_ was adopted at a regular meeting of the City Council of the City of San Clemente held on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by the following vote:

AYES:

NOES:

ABSENT:

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the City of San Clemente, California, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
CITY CLERK of the City of  
San Clemente, California

Approved as to form:

\_\_\_\_\_  
City Attorney

