



# City of Del Mar



September 29, 2017

VIA EMAIL AND MAIL

California Coastal Commission  
c/o Sea Level Rise Working Group  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**SUBJECT: Coastal Commission Draft Residential Adaptation Policy Guidance**

Dear Members of the Coastal Commission Sea Level Rise Working Group,

Thank you for the opportunity to comment on the draft Residential Adaptation Policy Guidance. Members of the Del Mar City Council and City staff viewed your recent webinars and presentations to the Coastal Commissioners. We appreciate the on-going coordination between our agencies and would like to take this opportunity to comment on how the Commission's Policy Guidance could affect Del Mar residents, owners, and the City itself.

The main takeaway at this point is that any adaptation plan developed to meet state requirements must be afforded the opportunity to account for and adapt to the unique circumstances and constraints within the local context. We agree with the Coastal Commission approach to customize adaptation strategies to local conditions. In Del Mar, we have unique neighborhood features and vulnerabilities that must be accounted for relating to coastal bluffs, the San Dieguito Lagoon, low lying floodplains affected by the San Dieguito River, a century-old beach front neighborhood subject to both coastal and river flooding, and public facilities and infrastructure.

Del Mar is currently looking into available options for development of a local Adaptation Plan; and the draft Policy Guidance, webinars, and Coastal Commission discussion on this topic have been helpful in that regard. That being said, the City has not and will not commit to any specific direction until the City Council has had a chance to review and consider the options. Through our own multi-year process we have learned there must be robust public dialogue regarding the various adaptation options available. Del Mar established a technical advisory committee in 2015 to provide a public forum to help engage the public to discuss and consider adaptation strategies and provide input. The City plans to use this forum to further engage the community and increase participation prior to formulating draft Local Coastal Program (LCP) documents.

We are getting substantial feedback, particularly from owners in areas of projected flooding and erosion-related impacts. The following concerns are a sample of what we are hearing in regards to unique local characteristics and options for adaptation in Del Mar:

- Provide a full toolbox of adaptation options for future decision makers to choose from
- Prioritize beach nourishment and sand replenishment
- Maintain a walkable beach for as long as possible
- Avoid conflicts with Del Mar's 1988 "Beach Preservation Initiative"(BPI)- the community's desired regulations to protect the beach for present & future generations
- Maintain the certified LCP allowance for seawalls of certain design to be built, repaired, and maintained per the BPI to protect existing structures in the beach neighborhood
- Beach front seawalls serve a key functional role in Del Mar to protect structures and coastal access by minimizing coastal flooding in adjacent low lying floodplain areas
- It is too soon to plan for retreat of any structures on private property in Del Mar
- Managed retreat is not feasible for the century-old Del Mar beach neighborhood
- Bluff adaptation options will vary depending on whether railroad tracks are relocated

In closing, the City would like to emphasize the importance of accounting for the local context in the Commission's sea level rise policy guidance. We have been advised this is an untested area of the law and it is critical that local jurisdictions be afforded flexibility to consider a phased approach that will allow for conflict resolution at the local level where possible. It is crucial that we work together to maintain a predictable process for development review with reasonable requirements that can adapt to changing environmental conditions and that will allow the City to nimblely move forward with the planning needed to respond for public property when the level of severity and risk has increased to the specified level of significance, and to provide that same flexibility for private owners to make decisions in regards to vulnerable private property. Thank you for your consideration.

If you have follow up questions, please contact Del Mar Planning staff at: (858)755-9313, or via email [kgarcia@delmar.ca.us](mailto:kgarcia@delmar.ca.us) or [alee@delmar.ca.us](mailto:alee@delmar.ca.us)

Sincerely,

A handwritten signature in dark ink, appearing to read "Terry Sinnott". The signature is written in a cursive, slightly slanted style.

Terry Sinnott  
Mayor