



October 2, 2026

Delivered via email

To: Meagan Harmon, Chair, California Coastal Commission
CC: Kate Huckelbridge, Executive Director, California Coastal Commission,
San Diego Coast District Director Karl Schwing

Re: Th8a, City of Carlsbad LCP Amendment No. LCP-6-CAR-25-0057-2 (Land Use Plan Update and Poinsettia Shores Master Plan Amendment)

Dear Chair Harmon, Commissioners, and San Diego Coast Staff,

The Surfrider Foundation is a nonprofit grassroots organization dedicated to the protection and enjoyment of our world's ocean, waves, and beaches, for all people, through a powerful network. We support much of Carlsbad's Land Use Plan update, especially with Commission staff's suggested modifications. However, even as modified, the LUP falls short in setting affirmative policies to ensure the preservation of Carlsbad's beaches and equitable public access to them. We ask the Commission to strengthen several provisions that will determine the future of Carlsbad's beaches as sea levels rise.

We support:

- **SM 8-20**, defining "existing structure" as one that existed prior to January 1, 1977. Earlier drafts had included a definition inconsistent with legally settled Coastal Act interpretation.
- **SM 7-14**, requiring new development and redevelopment in sea level rise hazard zones to record a notice that the property cannot be protected by shoreline armoring in the future, except as allowed under Coastal Act Section 30235, and that the structure may need to be removed if it becomes unsafe.
- **SM 7-17**, treating enlargement, including importation of new material, or replacement of 50 percent or more of a device as a new device.
- **SM 7-18**, requiring any permitted shoreline armoring to carry a mitigation and monitoring plan that is reviewed every 20 years, including consideration of removal.
- **LCP-7-P.21**, prohibiting armoring for new development and redevelopment and requiring a recorded waiver.
- **SM 3-6**, protecting lower-cost overnight accommodations.
- **SM 4-6**, requiring a coastal development permit for new fees, curfews, or restrictions at beach parking lots.

These policies are essential to keeping Carlsbad's public beaches, especially in the developed areas where much of the shore is already armored. But the City must do more to plan for rising seas, consistent with the Coastal Act. The update sets adequate hazard rules for individual projects but

defers area-wide adaptation planning to 2034, while committing now to land uses on several of the parcels that adaptation will depend on.

We request the following changes.

1. Close the redevelopment baseline gap in the hazards chapter

We support SM 8-27's cumulative 50 percent redevelopment threshold, which prevents oceanfront structures from being rebuilt piecemeal over time while keeping armoring that would otherwise no longer be allowed. However, SM 8-27 counts cumulative alterations from October 9, 1996, or the earliest documented alteration. The baseline should be January 1, 1977, consistent with the existing structure definition.

2. Plan now for inland relocation of the campground and Carlsbad Boulevard

Two distinct problems along Carlsbad Boulevard need commitments in this LUP. Near Las Encinas Creek, the road and the armoring that protects it are squeezing out the beach. Farther south, the state campground will eventually be lost to erosion and needs space to move inland. Both are within the 3.5-mile stretch the LUP designates as Special Planning Area "Ponto/Southern Waterfront A" (Figure 2-2C). The LUP's narrative envisions realignment creating a "linear park/promenade" and "park and gathering opportunities." Yet the LUP contains no specific policies for Area A. Its only realignment policy, LCP-3-P.14, asks the City to "consider" recreation opportunities as part of its "evaluation" of realignment for southbound Carlsbad Blvd.

Commit to realigning Carlsbad Boulevard where the road is costing the beach

In the northern part of Area A, the City has repeatedly placed emergency riprap along South Carlsbad Boulevard near Las Encinas Creek (staff report pp. 101, 111). This area makes up a sizable portion of the 11,280 linear feet of transportation infrastructure near Las Encinas Creek and Batiquitos Lagoon that will face severe erosion and flooding by 2100, according to the City's 2017 Sea Level Rise Vulnerability Assessment. The assessment notes that "right of way does appear available on the landward side of the southbound roadway at Las Encinas Creek." Its Recommendation #5 advises the City to "consider landward relocation of public assets...Carlsbad Boulevard in the vicinity of Las Encinas Creek is an example of a potential landward relocation opportunity."¹

The City has extensively studied realignment there, specifically along the mile-long section between Manzano Dr. and Island Way, but has yet to commit to it. Modeling by GHD for the Las Encinas Creek Restoration Alternatives Analysis² and the South Carlsbad Climate Adaptation Project Long-Term Master Plan³ shows what is at stake. If the old roadway and riprap remain in place (for up to 96 years) under a "Phased Adaptation" approach, the beach will be completely lost with just 1.7 feet of sea level

¹ References to [City of Carlsbad SLR Vulnerability Assessment](#), Dec 2017, p. 26, 38

² <https://library.carlsbadca.gov/home/showpublisheddocument/14549/638266603584730000>

³ https://20811975.fs1.hubspotusercontent-na1.net/hubfs/20811975/San%20Diego/PDF%20documents/Policy%20Document%20South%20Carlsbad%20Climate%20Adaptation%20Project_Long-Term%20Master%20Plan.pdf

rise. Public access is *already* impacted; the revetment exacerbates erosion, and the beach is inaccessible at high tides. Conversely, implementing "Retreat Now"—moving the road and removing all rock riprap—allows for nature-based beach restoration that remains resilient under an extreme SLR scenario of 6.6 feet.

We ask for the following changes:

- **Add realignment policies for Ponto/Southern Waterfront A.** These should commit the City to pursue landward realignment of Carlsbad Boulevard to preserve beaches and public access, in coordination with State Parks and the City's South Carlsbad Boulevard Climate Adaptation Project. They should also designate any area vacated by realignment as Open Space for beach, public access, and habitat use.
- **Prioritize relocation over prolonged armoring.** LCP-7-P.30 (staff report p. 110) asks adaptation plans to consider landward relocation of critical infrastructure where feasible. It should go further and favor near-term managed retreat over phased approaches that retain armoring, so that adaptation plans prevent prolonged passive erosion of the beach.
- **Require shoreline restoration with realignment.** Any coastal development permit for realignment or relocation of South Carlsbad Boulevard should require removal of all existing seaward riprap and revetments and restoration of a natural, migrating beach profile.

Preserve room for the state campground to move inland

Farther south, the problem is the campground. The staff report quotes the City's 2017 assessment, which finds that a majority of South Carlsbad State Beach's day-use facilities and campgrounds are exposed to bluff erosion by 2050, and that "the loss of this park would be significant since adequate space for the park to move inland is not available." It recognizes the park as an important asset "providing low-cost visitor serving amenities" and concludes that "this vulnerability poses a high risk to coastal access, recreation, and tourism opportunities in this planning area." It also finds southbound Carlsbad Boulevard exposed near Avenida Encinas, directly in front of Planning Area F.⁴

The finding that the park has no room to move reflects its current boundaries. But landward space exists in two places. The first is roughly half a mile of abandoned Highway 101 between Breakwater Road and Ponto Road, directly landward of the campground, with 50 to 80 feet of space. The second is the undeveloped Ponto planning areas. No LUP policy addresses relocating the campground as the beach migrates landward.

Meanwhile, the LUP identifies the Ponto/Southern Waterfront area as a key site for visitor-serving growth. These designations predate the City's 2017 vulnerability assessment. And the adaptation plan that should guide relocation is not due until 2034 (SM 7-21, 7-22). Committing the last undeveloped upland land at Ponto before that plan exists risks foreclosing the most realistic path to preserving the beach and campground.

⁴ References to [City of Carlsbad SLR Vulnerability Assessment](#), Dec 2017, p. 25, 26

The failure to set any affirmative policy that would guide the City toward saving this critical and vulnerable stretch of beach, along with its lower-cost overnight accommodations, neglects Coastal Act Sections 30270 and 30223⁵. Without an LUP that commits the City to action, Carlsbad will eventually lose its single largest inventory of lower-cost coastal overnight accommodations. A relocated state campground is a lower-cost visitor-serving use, consistent with the Visitor Commercial designation on Planning Areas G and H and with Section 30213. For these reasons, Surfrider supports California State Parks' September 21, 2026 request that a significant portion of the Ponto area be set aside to support the adaptive capacity of South Carlsbad State Beach.

We ask for the following changes:

- **Restore the campground retreat language the City removed in 2021.** The City's earlier draft stated that realignment would provide area for the state campground "to expand or retreat inland" (Exhibit 1, Attachment A, pp. 4 and 7).
- **Add a campground relocation policy for Ponto/Southern Waterfront A.** It should commit the City to work with State Parks on inland relocation of the campground and day-use facilities, including onto the abandoned Highway 101 segment and any roadway area vacated by realignment.
- **Amend LCP-2-P.21.** Development in Areas 1 and 3 of Figure 2-2C (Planning Areas F-West, G, and H) should be sited and designed to preserve feasible options for inland relocation of Carlsbad Boulevard and the state campground.
- **Apply the District 2 standard** (removable, at-grade structures only) to all of Planning Area F-West outside District 3. We support staff's Poinsettia Shores modifications, and staff finds that full buildout "would eliminate any opportunity for the relocation of the campground or of Carlsbad blvd." (staff report p. 112). However, District 2 is a small portion of the 3.83-acre site and is insufficient for relocating Carlsbad Blvd. or the campground.

3. Keep lower-cost accommodations in Carlsbad

We support SM 3-6's protection of existing lower-cost overnight accommodations through 1:1 replacement, and its requirement that new high-cost hotels provide at least 25 percent of units as lower-cost (staff report pp. 16–18, 88–90). However, two of its provisions allow Carlsbad's lower-cost obligation to leave the City:

- **Subsection (d)** permits substitute units anywhere in the San Diego County coastal zone.
- **Subsection (j)** permits in-lieu fees to be spent outside the City after seven years.

In an affluent coastal city, this mechanism allows lower-cost access to be exported to less desirable stretches of coast while Carlsbad's shoreline becomes more exclusive. That result conflicts with the

⁵ 30270: The commission shall take into account the effects of sea level rise in coastal resources planning and management policies and activities in order to identify, assess, and, to the extent feasible, avoid and mitigate the adverse effects of sea level rise.

30223: Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

Commission's Environmental Justice Policy goal of no net loss of lower-cost facilities. Subsections (d) and (j) should be removed to ensure that lower-cost access remains nearby, and to further facilitate eventual inland relocation of the campground.

The campground currently provides more than a third of Carlsbad's lower-cost supply (220 of 587, per staff). Because each campsite accommodates up to eight people, it serves roughly half of the city's lower-cost overnight visitors by capacity. Without the campground, Carlsbad's lower-cost accommodation inventory drops down to approximately 14 percent.

SM 3-6 applies only when development removes units, so loss of campsites to erosion triggers no replacement. In addition to planning for campground relocation, the LUP should count hazard-related loss of campground capacity toward no net loss and require planning for its replacement within Carlsbad's coastal zone.

Relatedly, SM 2-3 provides that the City "may consider" environmental justice when acting on coastal development permits and LCP amendments. "May" should be "shall." Environmental justice considerations should be a consistent part of coastal decision-making in Carlsbad, particularly as sea level rise and development pressure affect who can reach and afford to stay on the coast.

4. Beach access

Lateral access easements under SM 4-3 should be ambulatory, moving landward with the shoreline so public access persists as the beach migrates.

We thank staff for years of work on this update. Roughly 75 percent of Carlsbad's shoreline remains publicly held and undeveloped. But with no commitment to realign Carlsbad Blvd. or relocate the campground, this LUP allows the City to sacrifice a 44-acre state beach, its 220 lower-cost campsites, and a beach near Las Encinas Creek that is already being squeezed out by emergency armoring. Please consider our suggested refinements to ensure that Carlsbad's beaches and public access are preserved as the coast changes.

Thank you for your consideration.

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