



DEPARTMENT OF PARKS AND RECREATION
San Diego Coast District
4477 Pacific Highway
San Diego, CA 9211

Major General Anthony L. Jackson, USMC (Ret), *Director*

July 8, 2013

Mary Shallenberger
Commission Chair
California Coastal Commission
P.O. Box 354
Clements, CA 95227-0354

RE: U.S. Army Corps of Engineers 50-Year Coastal Storm Damage Reduction and Beach Nourishment (Consistency Determination No. CD-003-13).

California State Parks (CSP) is concerned about one potential serious effect of the 50-year Coastal Storm Damage Reduction and Beach Nourishment project proposed by the U.S. Army Corps of Engineers for the City of Solana Beach and City of Encinitas (Project). CSP remains supportive of the overall project but recent experience with maintenance of the Los Peñasquitos Lagoon Inlet after a recent sand replenishment effort has given us cause for alarm. The Project could greatly affect our ability to maintain the health of the Los Peñasquitos Marsh Natural Preserve (LPMNP) by cutting off tidal mixing due to increased sediment input into the Lagoon's ocean inlet. The project may result in elevated beach profiles at Torrey Pines State Beach caused by the accretion of additional sand from the north-to-south movement of the Oceanside Littoral Cell.

Recent beach nourishment efforts conducted in 2012 by SANDAG likely resulted in far greater than normal amounts of sand deposited within the inlet at LPMNP and along Torrey Pines State Beach. As a result, the Lagoon experienced multiple, extended inlet closures that greatly impacted salt marsh vegetation and several sensitive plant species, severely degraded water quality, impaired nesting and foraging of listed bird species, and exposed nearby community and park visitors to mosquitos that can transmit dangerous pathogens to humans. The Los Peñasquitos Lagoon Foundation (LPLF), CSP, City of San Diego, County of San Diego and others have partnered in the very costly effort to maintain the inlet in recent years without a stable funding source for routine maintenance. The Army Corp's project currently under review by the Commission will place much larger volumes of sand than the SANDAG efforts within the similar locations and will almost certainly add to the cost of the inlet maintenance.

CSP has been generally supportive of sand replenishment efforts; however, this project needs to address the unintended costs of sand replenishment on this greater scale. At a minimum the Project proponents should provide a funding mechanism for the long-term monitoring of beach profiles and sand inputs near and within down-current coastal lagoons. Additionally the project proponents must provide similar long-term funding to allow the LPLF, State, and City of San Diego to respond to any extraordinary sand management issues that arise due to the proposed beach nourishment project.

CSP would ask the Coastal Commission to continue its work to protect Los Peñasquitos Lagoon and work with CSP and the Army Corps to assure that beach nourishment efforts do not significantly impact the Los Peñasquitos Marsh Natural Preserve.

Thank you for your attention to this important project. If you have any questions please contact Darren Smith, acting District Specialist Manager at (619) 952-3895.

Sincerely,

 for CLAY PHILLIPS

Clay Phillips, San Diego Coast District Superintendent

Cc Darren Smith, Acting District Services Manager
 Cindy Krimmel, District Environmental Coordinator
 Robin Greene, North Sector Superintendent
 Mike Hastings, Los Penasquitos Lagoon Foundation
 Sherri Lightner, Councilmember for District One, City of San Diego
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