




City of Oceanside
Development Services Department
Engineering Division

Memorandum

Date: November 22, 2022
To: Engineering Staff
Public Works Staff
Planning Staff
Utilities Staff
From: Brian K. Thomas, City Engineer 
Subject: Beach Sand Replenishment Conditions of Approval

This memo supersedes the memo issued February 1, 2019 as it contains updated information regarding permits which allow the placement of sand on the City's beaches from Seagaze Drive to Pine Street and from Oceanside Boulevard to Loma Alta Creek. The City now operates under three permits that comprise the Sand Compatibility Opportunistic Use Permit (SCOUP for short). SCOUP contains the following issued permits:

California Coastal Commission Permit No. CDP 6-21-0628	exp. 04/18/2027
Regional Water Quality Control Board Order No. R9-2022-0059	exp. 06/14/2027
Army Corps of Engineers (ACOE) Permit No. SPL-2014-00271-RRS	exp. 11/29/2026

Opportunistic sand that is identified from construction projects and other sources, and approved as a suitable beach replenishment sand source by the U.S. Army Corps of Engineers (ACOE) and the U.S. Environmental Protection Agency (US EPA) can be placed on the City's beaches under this program.

All projects that are located west of El Camino Real within the City Limits and all projects located within the sphere of influence of the San Luis Rey River and Loma Alta Creek are to be conditioned to test all exportable materials for inclusion in the City's Beach Sand Replenishment effort. Preliminary soil export testing results will be reviewed by the City's Geotechnical Engineer/Geologist, in consultation with the City's Coastal Zone Administrator. All exportable material that meets beach sand suitability requirements will be required to be sampled and tested, excavated and deposited directly on the beach per the SCOUP permit guidelines and through a coordinated effort with Public Works.

Prior to placement of any suitable material, a Sampling and Analysis Plan must be developed, submitted and approved by the US EPA and ACOE per the Inland Testing Manual. This Sampling and Analysis Plan is developed on a per project basis and must be done early in the geological investigations of a project; for development projects this should be done with the first submittal and should be mentioned during the DRC meeting, and for CIP projects, this should be done as part of the preliminary soils' investigation work prior to the 30-percent submittal phase.

The creation of a Sampling and Analysis Plan (SAP) is incumbent on the developer of an inland site or the assigned project manager for a CIP project, as they are the ones needing to "dispose" of material. However, the City (Jayme Timberlake and Jim Knowlton) need to be involved early on and throughout the process. In general, the SAP needs to begin as early as potential beach sand is noted on a site as the approval process will take at least 6 months. Once a preliminary SAP is approved by the US EPA and ACOE, further sampling and testing occurs; the test results are to be submitted in a follow-up SAP. Once all export materials receive final approval, a Project Notification Report must be completed by internal staff, and sent to the permitting agencies listed above. The overall timeframe from the identification of suitable sand export to placement on the beach is estimated at 7-9 months and will need to be accounted for in the project schedule(s).

The timeframe to place sand is September 15th to February 28th.

However, suitable material may be stockpiled at Moody's upon approval of Moody's, Jayme, Jim and the City Engineer if the excavation work occurs March 1st through September 14th of each year and if a SAP is completed and approved prior to excavation and export. Coordination with Public Works will be required to determine the cost associated with Public Works staff's involvement to move the stockpiled material to the beach so that a deposit account can be established to pay for the move. For work occurring September 15th through February 28th the developer or CIP project manager shall coordinate directly with Public Works staff and the Coastal Zone Administrator for the correct area for material deposition.

Effective immediately, Land Development staff shall condition development projects that lie within the prescribed areas to move the excavated material as noted above and pay requisite fees associated with Public Works staff efforts to relocate from Moody's to the beach. CIP project managers shall be responsible for ensuring that all projects that lie within the prescribed areas follow the same.

The first order of work is to determine the suitability of excavated material. The developer and CIP project manager will be required to provide test results as part of the geotechnical report demonstrating the suitability of excavated soil for beach sand replenishment.

Effective immediately, please include the following Condition of Approval on all development projects. All CIP projects are to include similar wording within the professional services agreements.

Beach Sand Replenishment Condition of Approval

“As part of the City’s Opportunistic Beach Fill Permit, this project has been conditioned to test proposed excavated material to determine suitability for deposit on city beaches as part of the Beach Sand Replenishment program. Preliminary soil test results shall be provided as part of the project geotechnical report which is required prior to approval of the grading plan and issuance of the grading permit.

Suitable beach replenishment material shall be at least 75% sand with no more than a 10% difference in sand content between material at the source and discharge site. Replenishment material shall contain only clean construction materials suitable for use in the oceanic environment; no debris, silt, soil, sawdust, rubbish, cement or concrete washings, oil or petroleum products, hazardous/toxic/radioactive/munitions from construction or dredging or disposal shall be allowed to enter into or be placed where it may be washed by rainfall or runoff into waters of the United States. Any and all excess or unacceptable material shall be completely removed from the site/work area and disposed of in an appropriate upland site.

If the sediment to be exported is determined to be suitable beach replenishment material and is approved by the regulatory agencies, the developer’s contractor will coordinate with the City’s Coastal Zone Administrator for further discussion and direction on placement.

Coordination is required to occur a minimum of eight weeks in advance of the need to place approved excavated material on the beach.”

Please let me know if there are any questions.

Respectfully,
Brian
Ext. 5074

cc: Jonathan Borrego, City Manager
Michael Gossman, Assistant City Manager
Rob O’Brien, Deputy City Manager
Jayme Timberlake, Coastal Zone Administrator
Darlene Nicandro, Development Services Director
Hamid Bahadori, Public Works Director
Lindsay Leahy, Water Utilities Director