



September 4, 2026

California Coastal Commission  
455 Market Street, Ste 300  
San Francisco, CA 94105

Submitted via [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)

**Re: Agenda Item W10b: 2026–2028 Work Plan and Budget for Channelside (formerly Poseidon) Carlsbad Desalination Mitigation Independent Monitoring Program**

Dear Chair Harmon and Members of the Commission,

Please accept the following comments on behalf of San Diego Coastkeeper ("Coastkeeper") related to the 2026-2028 Work Plan and Budget for Channelside (formerly Poseidon) Carlsbad Desalination Mitigation Independent Monitoring Program. Coastkeeper would like to take this opportunity to register strong concern with Channelside's continued failure to complete required mitigation, and request more information on the status of the associated enforcement action, which we understand is being pursued separately and will not be affected by approval of the proposed work plan.

Extensive impacts to coastal resources and marine life have been ongoing and unmitigated for over a decade since the plant began operating in 2015. Since then, we've seen a familiar pattern of delay. Restoration work required to begin by October 30, 2021 did not commence until fall 2022. Construction was not finished until early 2025, and planting has still not occurred. Per the staff report, only partial planting is now planned for fall 2026, due to soil salinity issues Channelside characterizes as unforeseen—though we question whether these conditions could and should have been identified well before construction began. Completion has now been pushed out to 2028. Compounding this, Channelside has requested a one-year extension of the MLMP's four-year biological monitoring deadline, with the door left open for further extensions.

The description of the outstanding Coastal Act violation in this staff report is nearly identical to the 2024–2026 work plan report, with no substantive update in the interim. This has been a pattern of delay for years, with no clear consequence for Channelside as the facility continues operating unimpeded, and we remain concerned this reflects insufficient incentive to complete mitigation that should have been finished years ago. We would welcome greater clarity from Commission staff on what "continuing to explore opportunities for resolving" the violation concretely entails and on what timeline, and we urge the Commission to resist further extensions absent legitimate justification and to pursue stronger, more immediate enforcement.

Thank you for your consideration.

Sincerely,

Courtney Brown  
Staff Attorney, San Diego Coastkeeper