



October 15, 2025

California Coastal Commission
455 Market St, Suite 300
San Francisco, CA 94105

RE: Comments on Nature-Based Adaptation Strategies Guidance Document

Dear Executive Director Huckelbridge

Surfrider Foundation appreciates the Commission's leadership in developing comprehensive guidance that prioritizes nature-based solutions for coastal resilience. Overall, we are supportive of the document's intent and many of its core provisions. However, we offer the following comments to strengthen the Nature-Based Adaptation Strategies Guidance and ensure it effectively advances coastal protection while preserving public access, ecological function, and community priorities.

Overview

We commend Commission staff for:

- Providing a clear definition of nature-based adaptation that emphasizes natural or mostly natural systems, process enhancement, and dual ecological and protective benefits
- Explicitly prioritizing soft strategies (dunes, wetlands, sand replenishment) before hybrid or armoring approaches, which aligns with efforts to avoid new hard armoring
- Recognizing community engagement and Tribal consultation as essential components of permitting and planning processes
- Integrating the guidance with state policy drivers, including the 30x30 initiative and OPC Sea Level Rise Guidance
- Promoting a scaled and phased adaptation approach with neighborhood-scale planning and near-term nature-based solutions
- Including monitoring and adaptive management requirements to ensure transparency and learning from pilot projects
- Acknowledging the public trust doctrine and its relationship to nature-based adaptation strategies

Key Concerns and Recommendations

1. Hybrid Armoring and "Greenwashing" Risk

Concern: While the document includes hybrid approaches under the nature-based umbrella, there is insufficient guidance to prevent projects that function primarily as gray infrastructure from being



approved as nature-based solutions. Even with natural elements added, such projects could result in loss of beach, public access, and sediment supply.

Recommendation: Establish explicit criteria for determining the extent to which a project qualifies as nature-based, and clearly distinguish between projects that are fully nature-based and those that incorporate hard protective elements. When hard elements are included, applicants should be required to provide justification as to why fully "soft" nature-based strategies or alternatives are infeasible. Stronger guardrails are needed to ensure greenwashed projects do not circumvent Coastal Act protections.

2. Sand Replenishment as a Standalone Strategy

Concern: While we understand the tendency to define sand replenishment under "soft" strategies, it does not provide the same ecosystem benefits as habitat restoration when implemented as a standalone measure. Additionally, there is a significant difference between various hybrid approaches (e.g., buried seawall versus buried cobble berm) that should be acknowledged.

Recommendation: Sand replenishment should not be considered a standalone nature-based strategy eligible for CDP waivers or permitting exemptions without associated restoration components. We recommend requiring robust restoration plans as part of sand replenishment projects, such as passive sand capture fencing, dune space reallocation, or other habitat enhancement measures where site conditions permit. For larger sand replenishment projects, the Commission should consider conditioning approval on the inclusion of nature-based elements to ensure ecological benefits, improve project durability through sand retention, and enhance protection of inshore areas.

3. Managed Retreat Integration

Concern: Managed retreat is referenced only once in the entire strategies document. While the document promotes "holistic, proactive" adaptation approaches, it does not adequately connect the dots between nature-based strategies and managed retreat or explain how nature-based adaptation fits within a phased approach that includes eventual retreat.

Recommendation: Include explicit discussion of how nature-based adaptation strategies work in conjunction with managed retreat planning, particularly in the context of phased adaptation approaches where nature-based solutions serve as short- to mid-term measures.

4. Public Access Requirements

Concern: The document frames improvements to public access as "encouraged" rather than required. Nature-based adaptation strategies have the potential to limit access and recreation, especially during construction—a concern that applies equally to sand replenishment and other protective strategies.



There is concern that access could be lost long-term in the name of "restoration" without adequate safeguards.

Recommendation: Project applicants should be required (not merely encouraged) to identify existing access points, recreational uses, and cultural uses to inform appropriate siting of projects. Access should be protected and maintained to the maximum extent feasible, with any temporary or permanent access restrictions clearly justified and minimized.

5. Community Engagement Framework

Concern: While the draft calls for community engagement, the guidance is vague and provides no framework for what meaningful engagement entails or how to ensure equitable participation.

Recommendation: Develop stronger, more structured community engagement guidelines that promote equitable participation. The monitoring section outlines a monitoring plan for each project; there could be a similar plan or schedule for community engagement. However, we recognize that the Commission has limited ability to mandate pre-application engagement since most proposals have already been locally approved before a CDP application is submitted. The Commission could consider conditioning after-the-fact, ongoing engagement where appropriate, though care should be taken not to unduly burden applicants, including community-based organizations and non-profits.

6. Proportional Requirements and Application Process

Concern: The checklist and Appendix A requirements may be overwhelming for community-based organizations or small non-profit projects with limited capacity.

Recommendation: Consider establishing proportional requirements based on project scale, scope, and potential impacts, without compromising environmental protections. This could facilitate smaller pilot projects while maintaining appropriate review for larger, more complex proposals.

7. Monitoring and Adaptive Management Resources

Concern: Monitoring expectations are resource-intensive. Feedback from practitioners indicates that while funding is often available for project implementation, long-term monitoring is chronically underfunded. Relying solely on applicant responsibility for monitoring may not be sustainable.

Recommendation: Advocate for dedicated state funding to support long-term monitoring of nature-based adaptation projects, separate from project construction budgets. This would ensure projects are appropriately assessed over time and lessons learned can inform future coastal management decisions.



Conclusion

We strongly support efforts to incentivize nature-based adaptation projects that genuinely integrate natural features, contribute to measurable habitat enhancement or restoration, and align with community priorities. With the refinements suggested above, this guidance document can provide a robust framework for advancing coastal resilience while upholding the Coastal Act's required legal protections for public access, coastal resources, and environmental justice.

Thank you for your consideration of these comments. We look forward to working with the Commission to advance effective, equitable, and ecologically beneficial nature-based adaptation strategies along California's coast.

Sincerely,

Jennifer Savage
California Policy Associate Director
Surfrider Foundation

Emma Haydocy
Senior Manager, Coasts & Climate Initiative
Surfrider Foundation