



May 2, 2025

Delivered via email

To: Karl Schwing
District Director, San Diego Coast
California Coastal Commission

Re: W18c, Application No. 6-24-0375 (Rubenstein, San Diego)

Honorable Commissioners,

Surfrider Foundation is a nonprofit environmental organization that engages a vast volunteer network of ocean users to protect our world's ocean, waves, and beaches. Surfrider's San Diego County Chapter (Surfrider) represents thousands of ocean recreation users — from dedicated surfers to occasional beachgoers — as well as the coastal communities and economies that rely on them throughout the region. Thank you for the opportunity to comment on this development at 2865-67 Ocean Front Walk in Mission Beach, San Diego.

Surfrider generally opposes beachfront development due to the current and future risks it poses to our beaches and the public's right to access the coast. However, we understand that you are bound to language in both the Coastal Act and San Diego's LCP. In this case, we agree with Commission staff's proposed Special Conditions to bring this new development into conformance with San Diego's LCP, specifically compliance with FEMA Special Flood Hazard Areas construction standards. Additionally, new development cannot rely on the existing seawall that protects the Mission Beach boardwalk.

For those reasons, we agree that the new development must be elevated on piles at least two feet above the nearest base flood elevation (Special Condition No. 1). This will afford the home some protection from coastal hazards, without reliance on shoreline armoring, in an area that currently floods when a high tide converges with a large swell. For example, the Mission Beach boardwalk experienced coastal flooding in January 2023 (see photo on next page). As sea levels rise into the next century, such flooding will increase in both frequency and severity.

We also agree with the remainder of staff's proposed Special Conditions, which ensure protection of view corridors, a construction timeline that minimizes disturbance to public access, waiver of rights to future shoreline armoring, and other important considerations.



***Waves breached the seawall and flooded homes along the boardwalk on January 6, 2023.
The location depicted in this photo is 1.3 miles from the property in question***



In conclusion, Surfrider supports staff's proposed Special Conditions and agrees that this new development must be raised so that it neither relies on existing boardwalk armoring, nor future armoring during its projected project life. Thank you for the opportunity to comment on this item.

Sincerely,

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