



January 5, 2025

Delivered via email

To: ClimateResilientSD@sandiego.gov
Julia Chase, Chief Resilience Officer

Re: Surfrider comments on the San Diego DRAFT Coastal Resilience Master Plan

Dear Ms. Chase,

The Surfrider Foundation is a nonprofit grassroots organization dedicated to the protection and enjoyment of our world's ocean, waves, and beaches, for all people, through a powerful activist network. Our San Diego Chapter represents over 4,000 local members. Thank you for the opportunity to serve on the Coastal Master Plan Stakeholder Advisory Committee over the past 18 months. Please accept the following comments on the Draft Coastal Resiliency Master Plan.

Surfrider applauds the City for including a Draft Coastal Resilience Master Plan as part of its greater climate resiliency effort, Climate Resilient SD, and the public engagement efforts made to include community input throughout the process of developing this Master Plan. San Diego's public beaches are among the city's most valuable natural assets, core to its recreational and tourism economies. Sea level rise (SLR) from human-caused climate change poses an existential threat to these beaches, the loss of which would be catastrophic to San Diego's culture, economy, and low-lying coastal infrastructure.

The high-level concepts explored in the Draft Coastal Resiliency Master Plan (Master Plan) offer a great starting point to increase resiliency at some of the City's most popular beaches. Surfrider is generally in support of all of the Master Plan's concepts. Please accept our comments for the following specific sites below.

La Jolla Shores

Surfrider urges adoption of *Project Concept B-2: Reconfigured Park* as the City's launchpad for increasing SLR resiliency at La Jolla Shores. While it would be easier and less costly to retain the existing parking lot configuration, the proposed earthen dike and/or "seatwall" alone will only mildly improve flood protection. Ultimately, the

existing seawall and boardwalk will need to be moved back to make way for the sandy beach to migrate landward as sea levels rise.

If the Master Plan cannot call for landward transition of the seawall and boardwalk now, realignment of the park and designing it as a “floodable waterfront park” is the best interim step. Such realignment would immediately achieve higher coastal flood resilience by replacing much of the impermeable parking lot with permeable parkland. This interim solution would also better accommodate a future decision to move the seawall and boardwalk landward, ideally onto the east side of the realigned park if/when sea levels rise enough to necessitate a permanent change from parkland to beach. Meanwhile, the parking lot could be redesigned with better efficiency in mind.

We sympathize with those community members who feel averse to changing the park and parking lot they’re accustomed to using. However, community preference represents one element among many in the Master Plan. Surfrider contends that the Master Plan should prioritize science-based decision making which provides maximum resilience to city-managed beaches; doing so will provide the most benefit to the greatest number of San Diegans. Based on this criteria, Project Concept B-2 is the clear winner. Relocation of hard infrastructure away from an encroaching ocean is indisputably the simplest and most effective way to preserve our beaches and increase SLR resilience at the same time. Wherever feasible, it must be prioritized.



Flooded La Jolla Shores during the November '24 King Tides

Pacific Beach - Tourmaline Surf Park

Surfrider agrees that it would be a notable improvement to create a vegetated dune

on top of the existing revetment that protects the Tourmaline beach access and parking lot. If a more comprehensive resilience plan is not pursued for Tourmaline at this time, we urge the city to model and account for the sediment required to sustain a buried revetment over time. The Cardiff Living Shoreline demonstrates that a vegetated sand dune built atop riprap demands substantial maintenance to maintain sand coverage, support native plant establishment, and mitigate severe scarping along the dune toe throughout the seasons. Without a comprehensive maintenance plan and an identified source of compatible material, a buried revetment could quickly fall into disrepair.

However, covering a revetment with a vegetated dune will, at best, yield a very minor increase in SLR resiliency if no additional steps are taken. The main impediment to SLR resiliency at Tourmaline is the siting of the parking lot itself, which already necessitates shoreline armoring, i.e. the existing revetment. The revetment occupies valuable beach space, where it exacerbates beach erosion by interrupting the natural interaction between waves and the landscape. Covering it with a dune fails to address the underlying problem, ignoring a much greater opportunity to preserve Tourmaline in the face of rising seas and erosion.

We urge consideration of a more ambitious proposal, specifically by moving the entire parking lot back to provide more space for the beach to migrate landward. For example, the small grass area in the southeast corner of the parking lot could be cut in half and paved over for parking, while reorienting the access pathway to the city's electrical equipment. This would free up space to move the parking lot landward. The restrooms could be moved as well.



Can the entire lot be moved landward to improve SLR resilience? We believe so.

Additionally, replacement of the linear park along the Tourmaline St. entryway with new parking spaces could free up additional room to move the parking lot even further landward. Paving over the westernmost section of the linear park could provide space to install angled (or reverse angled) parking spaces.



Can underutilized green space be turned into angled parking spots, allowing even further landward migration of the parking lot?

We don't usually recommend removal of green space for car parking, but it's warranted under this circumstance because it would facilitate the preservation of threatened coastal resources without negatively impacting public access (i.e. minimal to no net loss in parking). Additionally, these particular green spaces are underutilized due to their siting between the parking lot and beach. By and large, Tourmaline visitors come to access the beach and ocean, not to enjoy an ill-sited grass area next to parked cars. Creation of more beach space, and better SLR resiliency, must take priority over preservation of these non-coastal dependent resources.

Needless to say, these ideas would need to be explored in detail to determine feasibility. However, the starting point to improve Tourmaline's resilience should include relocation of the parking lot and revetment, or relocation of the parking lot coupled with replacement of the revetment with engineered dunes. The beach cannot thrive under existing conditions due to the parking lot's location, a situation that will only become worse as sea levels rise. There is enough space to move it landward with zero to minimal loss in parking,, especially if covering the stormwater culvert is feasible as well.



Giving the beach more space is the only way to create a *Resilient Surf Park*

Mission Beach

For Mission Beach, we urge adoption of *Project Concept D-2: Perched Beach* because it incorporates additional beach recreation space. Beach recreation space is a coastal-dependent resource, therefore it must be given priority over grass parkland on the coast. Furthermore, there is ample grass space elsewhere along Mission Beach. Echoing our comments for the previous project designs, the City should take every opportunity to move the beach landward where it's possible to do so. Landward migration of the beach, wherever feasible, is the most effective, durable, and cost-effective nature-based solution to preserve this critical recreational space. It also sets the stage for future transition of parkland into beach space, which will eventually be necessary as sea levels continue to rise.

Ocean Beach - Dog Beach & Beachfront (Pier)

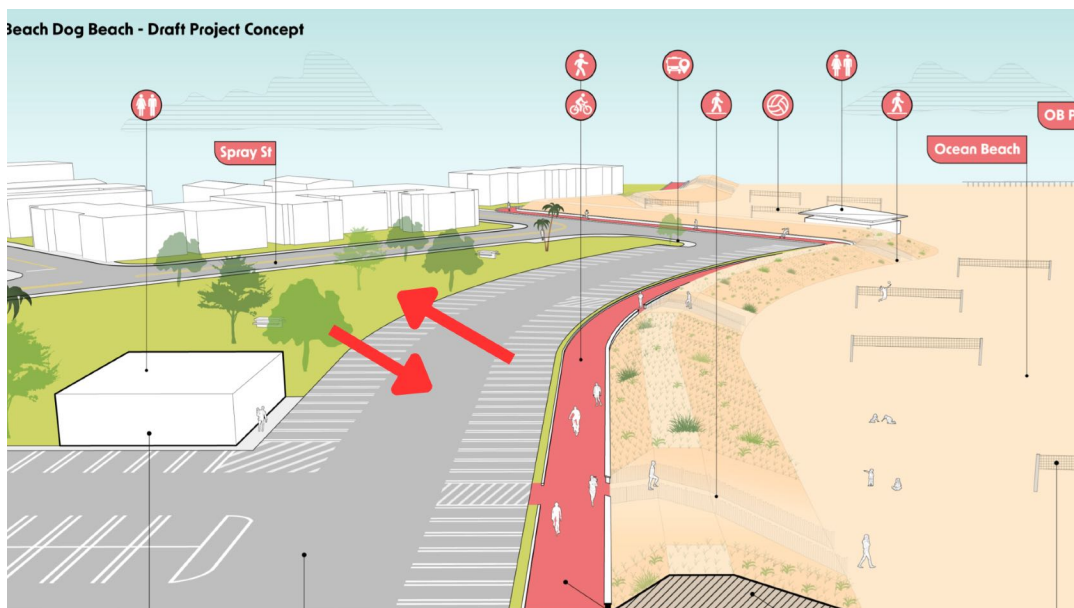
Surfrider supports the permanent dune installations across the back beach at both locations. While they may require occasional maintenance, a permanent dune installation would provide similar benefits to the City's annual winter berm program without the need to build, then flatten them, each year.

For Dog Beach, we're most supportive of the *Project Concept D-2, Resilient Relocation*, because it includes relocation of the bathroom which will eventually become threatened by SLR. And although it does not speak to coastal resilience, the

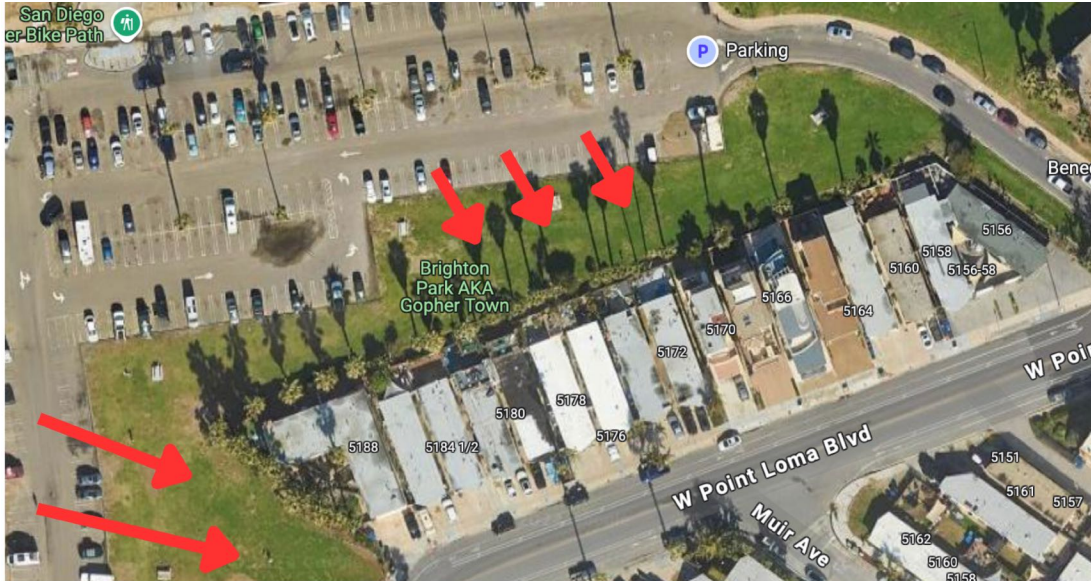
proposed multi-use path from Dog Beach to the Pier would be a welcome addition to connect the two main beach areas.

Thanks to a wider beach, Ocean Beach is less immediately threatened than Tourmaline or even La Jolla Shores. That said, we encourage a more detailed look at ways to reorient underutilized space in the Dog Beach parking lot to increase overall beach resilience. Brighton Park, which runs the entire length from Brighton to Voltaire, is underutilized because it's situated landward of the parking lot (similar to Tourmaline's green space).

A more resilient project for Dog Beach could borrow the same concept used on our preferred design for La Jolla Shores, *Project Concept B-2: Reconfigured Park*, by moving the park seaward and replacing it with the lost parking spaces. Doing so would create an attractive beachfront park that is unobstructed by parked cars. A floodable park would also add an additional layer of resilience, by protecting the infrastructure behind it from coastal storm surge. Relocation of the bathroom could be harmonized with this larger overhaul. Lastly, reorienting the parking lot now precipitates a future project that will inevitably need to occur once sea levels rise to a certain level.



Swapping the park with the parking lot would increase resilience to flooding, while replacing an underutilized park with an attractive beachfront park



Brighton Park is underutilized due to its bad location; why not study moving the parking lot into its footprint to create more beach and/or beachfront green space?

While not as critical as reconfiguring Tourmaline or La Jolla Shores, we would argue that the City will get the most long-term “bang for the buck” by incorporating these suggestions into the plan now rather than later.

Sunset Cliffs

Surfrider generally supports all of the proposals outlined in *Project Concept F-1: Resilient Cliff Design Options*. A one-way street from Cordova to Ladera will calm traffic and create more space to realign the parking lots away from the cliffs, as well as create a continuous dedicated pedestrian and/or bike path. These would all be welcome additions to Sunset Cliffs. Reorienting the parking lots away from the cliffs is especially notable for increased coastal resilience, as it will provide space to allow more natural cliff erosion before infrastructure (i.e. parking lots, the street, etc.) becomes threatened. We also agree that blufftop space should be prioritized for recreational use rather than parking lots, especially when coupled with a concept such as yours that minimizes loss of parking.

Stormwater improvements to minimize runoff over the eroding cliffs would also be welcome, and much-needed, throughout the entire Sunset Cliffs area.

Conclusion

Please assume that we generally support any specific elements of the Draft CRMP that are not mentioned in our letter. Surfrider appreciates San Diego's forward-thinking approach to adding SLR resilience to its most popular beaches. Please consider our suggestions to maximize resilience at each of the project concepts. Thank you for the opportunity to comment.

Sincerely,

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