



**April 16, 2025**

Delivered via email

To: [resiliencyboard@sandiego.gov](mailto:resiliencyboard@sandiego.gov)  
Resiliency Advisory Board

**Re: Item #8a: Coastal Resilience Master Plan and Programmatic Environmental Impact Report - *Discussion of draft plan and PEIR and adoption of recommendation(s)***

Honorable Resiliency Advisory Board Members,

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. Please accept the following comments on the Draft Coastal Resiliency Master Plan.

Surfrider is highly supportive of the City's coastal resilience efforts. In addition to having two representatives on the Draft Master Plans' stakeholder advisory committee, we submitted a detailed comment letter to Climate Resilient SD in January of this year. You can read that letter [HERE](#). We also detail our recommendations in this recent [blog post](#).

We generally support the concepts for each beach in the Draft Master Plan. At sites with multiple options, like Mission Beach and La Jolla Shores, we support the most resilient option and urge you to do the same.

We also agree with staff's recommended priority sites for Capital Improvement Projects - Dog Beach, OB Beachfront (Pier), Sunset Cliffs, and Mission Beach. We believe the concepts at La Jolla Shores, and especially Tourmaline, require additional scoping to include more aggressive resilience features. We also recommend consideration of parking lot/grass park realignment at the OB Dog Beach parking lot.

Before moving onto a summary of our recommendations for each site, please consider taking the following positions on the Draft Coastal Resilience Master Plan:

- Support for staff's recommended sites to be added into the Capital Improvement Program
- At Mission Beach, preference for *Project Concept D-2: Perched Beach*
- At OB Dog Beach, preference for *Project Concept A-2: Resilient Relocation*, plus future scoping of parking lot/park realignment to increase resilience
- General support for the concepts at Sunset Cliffs
- At La Jolla Shores, preference for *Project Concept B-2: Reconfigured Park*, plus additional scoping for boardwalk realignment to increase resilience
- At Tourmaline, additional scoping to realign the parking lot landward to increase resilience at this narrow, eroding beach

## **Summary of Recommendations for Each Site**

### **La Jolla Shores**

Of the two concepts, we urge adoption of *B-2: Reconfigured Park* because the “floodable waterfront park” concept offers better sea level rise (SLR) resilience than leaving the parking lot in place.

However, we encourage the City to consider moving the boardwalk (La Vereda) landward of the waterfront park, which would allow the beach more space to migrate inland as rising seas narrow the existing shoreline. The boardwalk already floods during King Tides. At some point between 2050 and 2100, such flooding will become a regular high tide occurrence if the boardwalk is left in place. Translation: no beach access, and no boardwalk access, during a regular high tide.

It's unrealistic to plan for no net loss of boardwalk, park, or parking lot space as sea levels rise. Failure to plan accordingly only leaves one possible outcome - permanent loss of beach in order to protect these other, less coastal dependent assets. This would be a mistake. 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**

The main impediment to SLR resilience at Tourmaline is the siting of the parking lot, 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 would be an improvement, but fails to address the underlying problem. Doing so would yield a very minor increase in SLR resilience if no additional steps are taken.

The only durable solution at Tourmaline is to realign the entire parking lot to provide more space for the beach to migrate landward. If the parking lot's underutilized grass areas were replaced with additional car spaces, enough space could be freed up to move the parking lot landward with minimal loss in parking. The bathroom would ideally be moved as well, but could also be left in place with a much smaller armoring footprint.



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



The ocean reaches the toe of the revetment during annual King Tides (2022)

## **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 and Bay.

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.

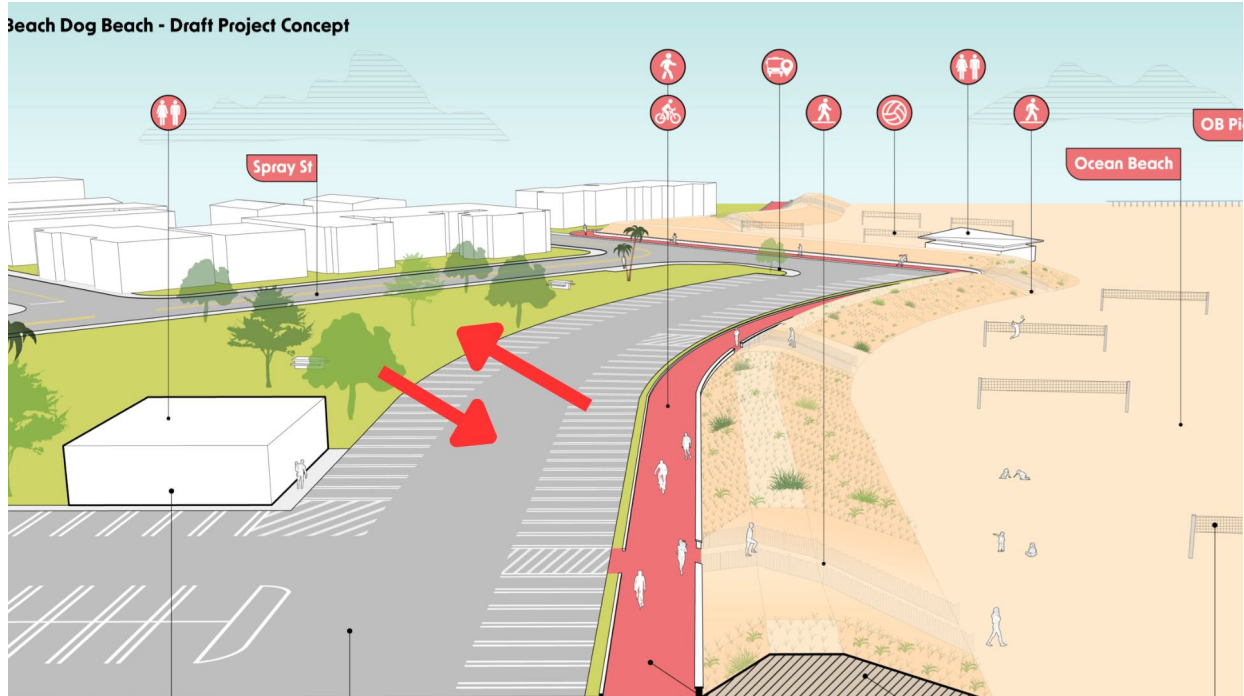
## **Ocean Beach - Dog Beach & Beachfront (Pier)**

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.

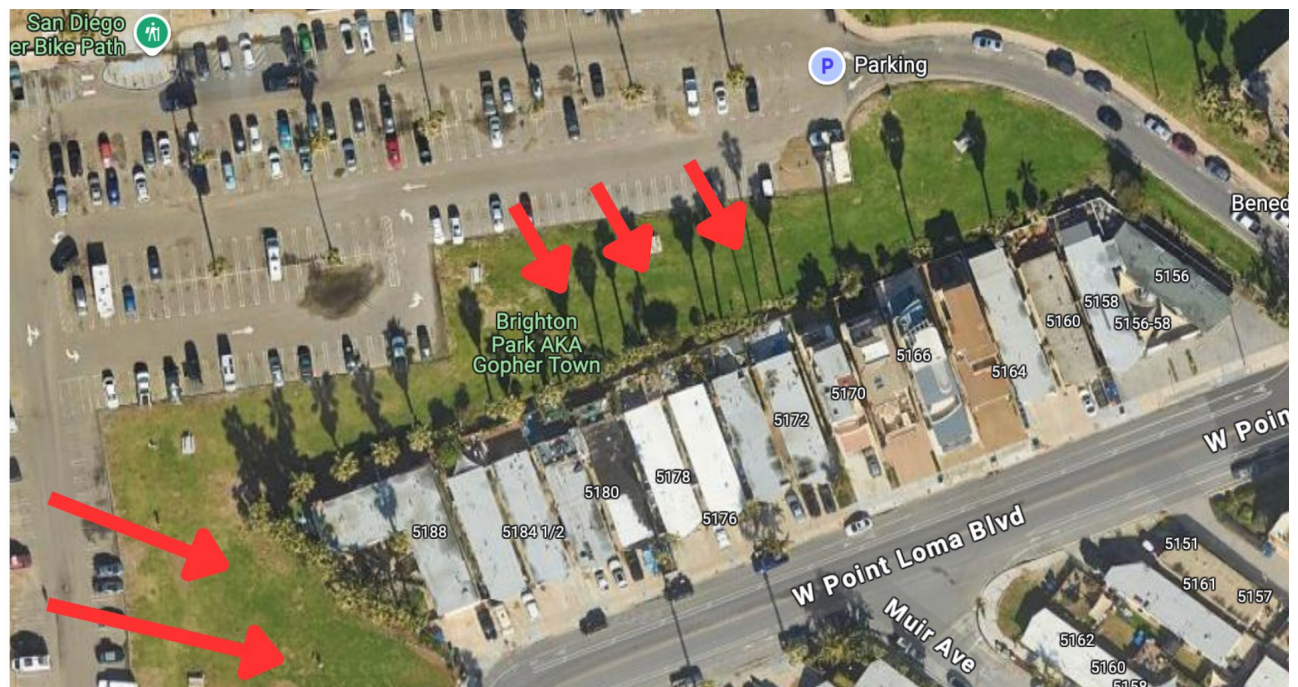
Thanks to a wider beach, Ocean Beach is less immediately threatened than Tourmaline or even La Jolla Shores. That said, we encourage a more detailed look at ways to reorient underutilized space in the Dog Beach parking lot to increase overall beach resilience. Brighton Park, which runs the entire length from Brighton to Voltaire, is underutilized because it's adjacent to the parking lot and not the beach. (similar to Tourmaline's green space).

A more resilient project for Dog Beach could borrow the same *Reconfigured Park* concept being considered at La Jolla Shores, 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.

Beach Dog Beach - Draft Project Concept



*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. Such space would be more beneficial if beach-adjacent.*

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. As the bluffs erode into the future and usable space along the boulevard becomes pinched, the City should not rule out an eventual transition to a car-free Sunset Cliffs Boulevard.

## **Conclusion**

Surfrider appreciates San Diego’s forward-thinking approach to adding SLR resilience at 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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