



June 11, 2025

Delivered via email

To: San Diego City Council Environment Committee

Re: Item #5: Coastal Resilience Master Plan and Program Environmental Impact Report

Honorable Chair Elo-Rivera and Environment Committee 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 Coastal Resiliency Master Plan.

Surfrider is highly supportive of the City's coastal resilience efforts. We served on the stakeholder advisory committee, attended community outreach meetings, and provided [comments](#) to Climate Resilient SD and more recently, to the [Resiliency Advisory Board](#).

We generally support the concepts in the Master Plan. At sites with multiple options, like Mission Beach and OB, we urge you to echo the Resiliency Advisory Board's support for the more resilient options. Meanwhile, we believe that the concepts for Tourmaline and La Jolla Shores should be improved to include more ambitious resilience features that center preservation of the beach itself, not just the infrastructure behind it.

Below you will find our recommendations on the staff's proposed actions for your Committee meeting, followed by a more detailed summary of our recommendations for each site.

Please VOTE as follows on Staff's proposed actions:

- ADOPT the Coastal Resilience Master Plan, with the following caveats:
 - Further consideration must be given to improve the proposals at Tourmaline and La Jolla Shores.

- At Mission Beach, voice preference for *Project Concept D-2: Perched Beach*
- At OB Dog Beach, voice preference for *Project Concept A-2: Resilient Relocation*, plus future scoping of parking lot/park realignment to increase resilience
- CERTIFY the PEIR so long as it allows flexibility for future changes to occur (i.e. Tourmaline, LJ Shores).
- AUTHORIZE the addition of the OB, Sunset Cliffs, and Mission Beach sites to the City's Capital Improvements Program (CIP P-26000)
- AUTHORIZE staff's \$466,000 budget request for CIP P-26000

Summary of Recommendations for Each Site

Mission Beach

For Mission Beach, we urge adoption of *Project Concept D-2: Perched Beach* because it incorporates additional beach recreation space - see image. Beach recreation space is a coastal-dependent resource, therefore must be given priority over grass parkland on the coast. Furthermore, there is ample grass space elsewhere along Mission Beach and Bay.

With sea levels rising at a rapidly accelerating rate, 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.



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Ocean Beach - Dog Beach & Beachfront (Pier)

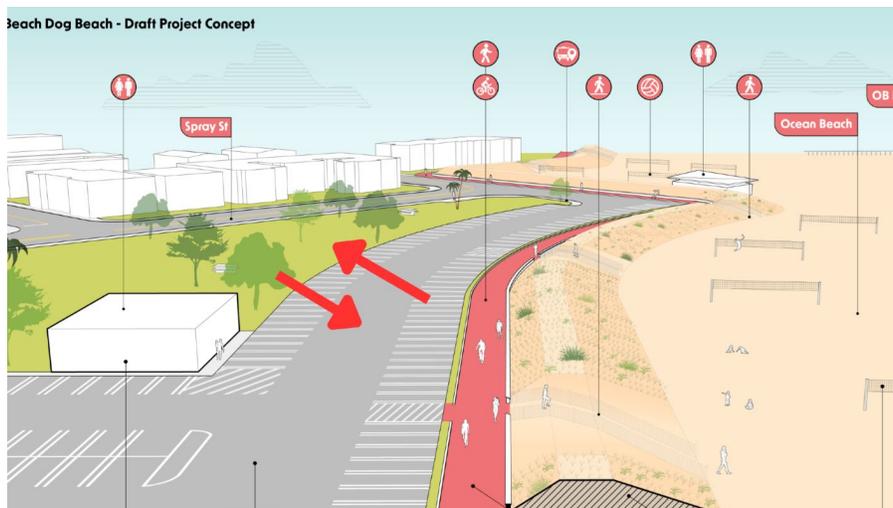


For Dog Beach, we're most supportive of the *Project Concept D-2, Resilient Relocation*, because it includes relocation of the bathroom to a more landward location, less threatened by sea level rise (SLR) - see image to the left.

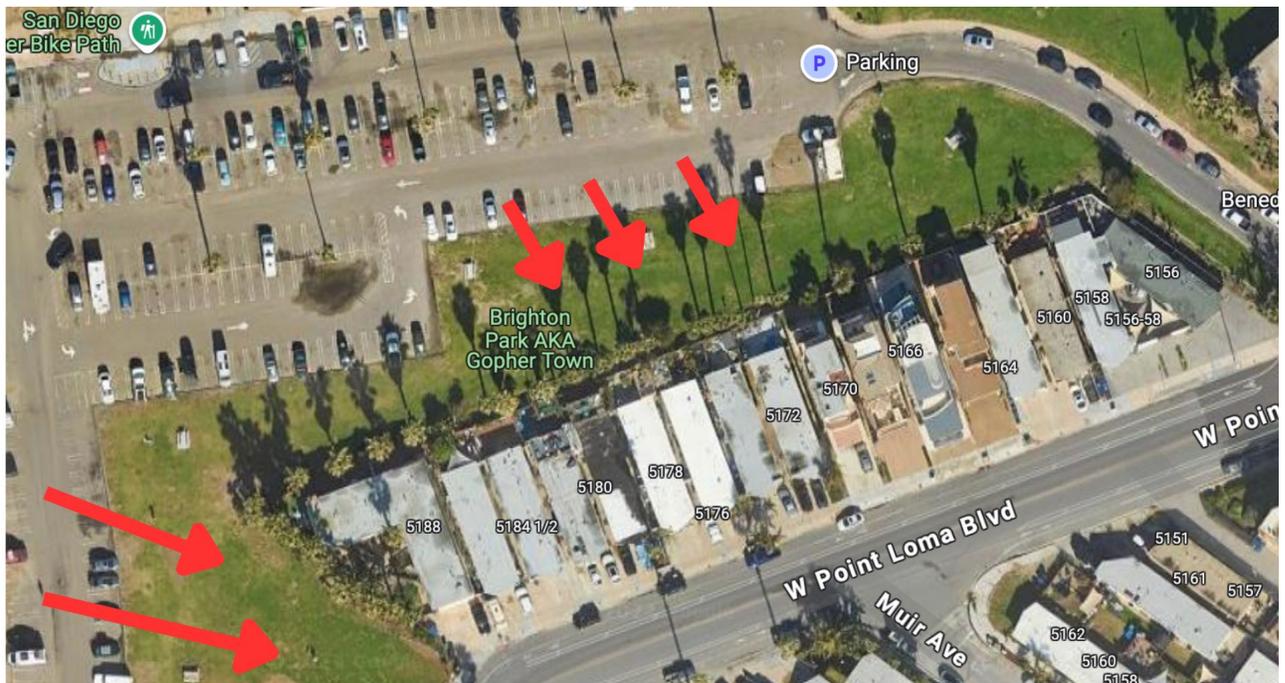
Thanks to a wider beach, Ocean Beach is less immediately threatened than Tourmaline or even La Jolla Shores. That said, we encourage a more detailed look at ways to reorient underutilized space in the Dog Beach parking lot to increase overall beach resilience. Brighton Park, which runs the entire length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

beach.

A more resilient project for Dog Beach could incorporate 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.



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.

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 for parking lots, especially when coupled with a concept such as yours that minimizes loss of parking.

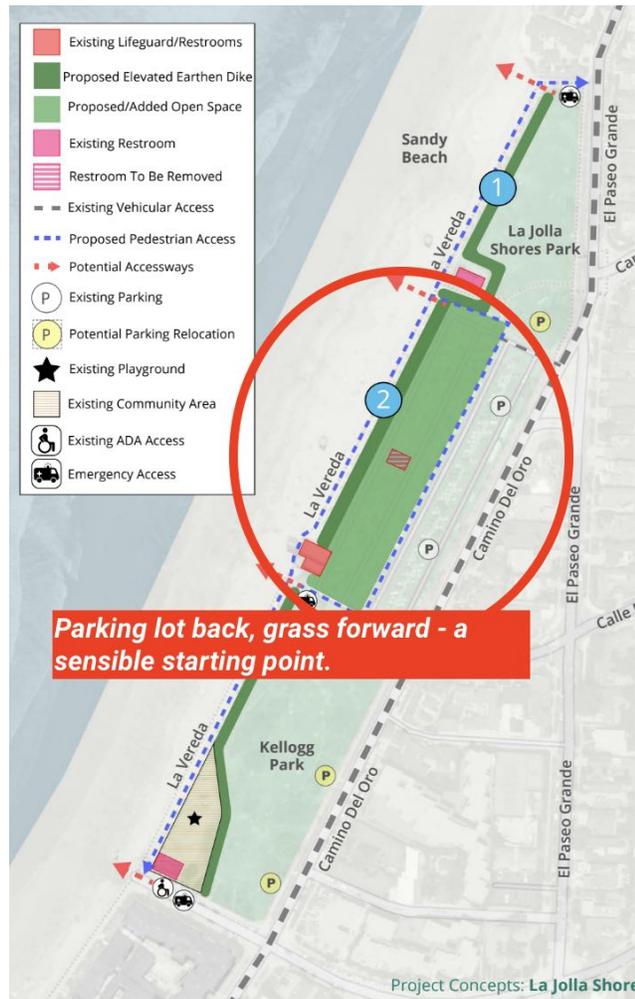
As the bluffs erode into the future and usable space along the boulevard becomes pinched, the City should not rule out an eventual transition to a car-free Sunset Cliffs Boulevard. Since homes on Sunset Cliffs are all served by an alley, loss of access to private property would not be an issue.

La Jolla Shores

Of the two concepts, we are more supportive 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 - see *image to the right*.

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. The current project proposals for La Jolla Shores DO NOT address this coming reality.

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 (an existing boulder 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.

We also support further consideration of undergrounding and/or covering the exposed storm drain culvert to the immediate north of the parking lot, which could lead to coastal water quality improvements along with more usable beach and parking lot space.



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)

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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