



May 21, 2025

Delivered via email

Luke Serna, Associate Park & Recreation Specialist
California Department of Parks and Recreation, Southern Service Center
2797 Truxtun Road San Diego, California 92106

Re: Notice of Preparation for an Environmental Impact Report: Border Field State Park Resilience, Access and Habitat Restoration Project

Dear Mr. Serna,

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 County Chapter, which represents over 4,000 local members, works to ensure equitable beach access countywide. Through our Clean Border Water Now program, we also advocate extensively for solutions and funding to solve the ongoing transboundary pollution issue in the Tijuana River Watershed that has resulted in a 3+ year beach closure at Border Field State Park (BFSP).

Surfrider is very supportive of this project's objectives. We are aware that Monument Road is frequently closed due to seasonal flooding, which poses major access challenges to visitors of both BFSP and Friendship Park. Such flooding will become more frequent and more severe due to climate change and rising sea levels. Therefore, we appreciate that the project aims to incorporate coastal resilience into the access improvements.

Below you will find a summary of environmental impacts we ask to be considered in the Draft Environmental Impact Report.

Water Quality, Air Quality, Hydrology, Geology & Soils, Hazardous Materials - it will be important to ensure consistency with the major wastewater and stormwater infrastructure improvements being planned on both sides of the border in this area. Are any stormwater conveyances, diversions, etc. being planned that may conflict with, increase flows, or decrease flows through the project area? If so, then how will that impact the project's overall goals, including the performance of the proposed box

culverts? Also, what will be the stormwater capacity of these culverts before they become overwhelmed, and how often (if at all) is that estimated to occur? We would also like to know what type of regular maintenance, if any, will be required to ensure the culverts do not back up with debris or sediment and cause flooding.

While installation of the culverts will likely decrease flooding of the road and surrounding areas and improve access, will it *increase* the amount of untreated Tijuana wastewater that flows uninterrupted into the Tijuana River Valley and subsequently, the ocean surrounding BFSP? If so, it is important to estimate by how much and study ways to mitigate pollution to the river valley and ocean. Also, please provide details on the proposed location of each culvert and why those locations were chosen.

Public Services, Recreation, Transportation - is it possible to quantify the public access improvements to BFSP that this project will provide? For example, access to BFSP is closed for 6-7 months a year under existing conditions. Our hope is that once completed, access to BFSP would be open and available to the public year-round. What levels of rain will prompt closures of the new accessway? Also, how resilient to sea level rise is this design? Surfrider asks that the project use projections from the Ocean Protection Council's [2024 Sea Level Rise Guidance manual](#) and provides detailed analysis of this project's sea level rise resilience over an estimated 75-year project life. The project should be updated if such an analysis fails to conclude that safe, year-round access will be provided for the entirety of the project life given sea level rise projections, including analysis of more frequent rain and storm surge events that are expected due to climate change.

We would also like to underscore the importance of well-placed, bilingual English-Spanish signage along the proposed access routes to inform park users of any water and/or air quality concerns and their potential impact on human health and ways to reduce such impacts in the project area and at BFSP. We would also like to see similar communications on relevant websites and in the Tijuana Estuary Visitor Center, as they pertain to this project area.

Biological Resources - Please provide analysis and/or recommendations for best management practices to avoid impacts to wildlife during construction, including timing of buildout.

Surfrider looks forward to reviewing the Draft Environmental Impact Report once it's available for public review. This project is a long-time coming and we sincerely appreciate California State Parks intention to create resilient, improved access to BFSP and restore habitat in the surrounding area.

Sincerely,

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