



September 9, 2025

Delivered via email

To: San Diego City Council

Re: Item #331: Coastal Resilience Master Plan and Program Environmental Impact Report

Honorable Council President La Cava and City Council Members,

The undersigned organizations write to you in support of the San Diego Coastal Resilience Master Plan (CRMP). From coastal recreation to aesthetics, habitat, and economic value, San Diego's beaches are a tremendous and irreplaceable asset to our communities. These organizations represent members of San Diego's underserved BIPOC and working class communities, youth, bird and wildlife advocates, and beachgoers and ocean enthusiasts generally, who depend on public access to the coastline.

Sea level rise and other climate-change impacts threaten vital coastal infrastructure, beach and wetland habitat, and the very existence of accessible beaches for the public to enjoy. Additionally, the City of San Diego sits on the Pacific Flyway, a global migratory bird highway. This plan could restore critical habitat for hundreds of species that depend on our beaches and coastal wetlands as stopovers. At minimum, the CRMP must ensure these habitats don't dwindle as sea levels rise. Preserving our beaches in the face of these challenges will take considerable planning and effort, and

the CRMP offers a great starting point.

Please vote in support of Staff's Recommendation to certify the PEIR, adopt the Coastal Resilience Master Plan, and authorize the addition of the Sunset Cliffs, Ocean Beach, and Tourmaline sites into the City's Capital Improvements Program along with the accompanying \$466,000 budget request.

We generally support the concepts in the Master Plan. At sites with multiple options, like OB and Mission Beach, 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, and prioritize nature-based solutions over coastal armoring.

By advancing this plan and incorporating the most resilient options, the City will:

- Protect public access to beaches, coastal parks, and surf breaks for future generations.
- Preserve critical natural habitats that buffer flooding and provide resilience.
- Support local businesses and tourism that rely on a healthy, accessible coastline.

Below you will find a more detailed summary of our recommendations for each site, starting with the sites proposed to move into design today: Tourmaline, Ocean Beach, and Sunset Cliffs.

Summary of recommendations for each site

Pacific Beach, Tourmaline Surf Park

The main impediment to sea level rise (SLR) resilience at Tourmaline is the siting of the vehicle ramp and parking lot, which already necessitates shoreline armoring (the 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.



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

Below: The ocean reaches the toe of the revetment during annual King Tides (2022). Covering it with sand will not preserve the beach.



Ocean Beach - Dog Beach & Beachfront (Pier)

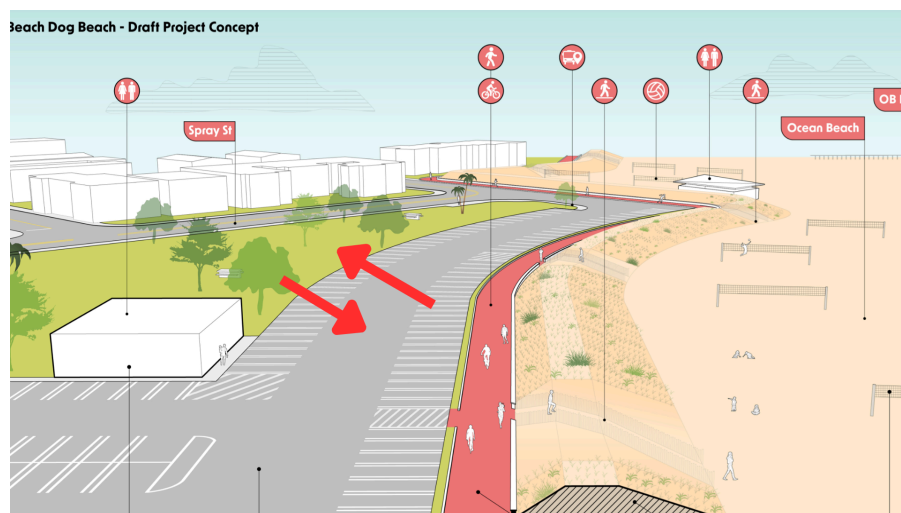


For Dog Beach, we're most supportive of the *Project Concept D-2, Resilient Relocation*, because it includes relocation of the bathroom to a more landward location, less threatened by sea level rise - see image to the left.

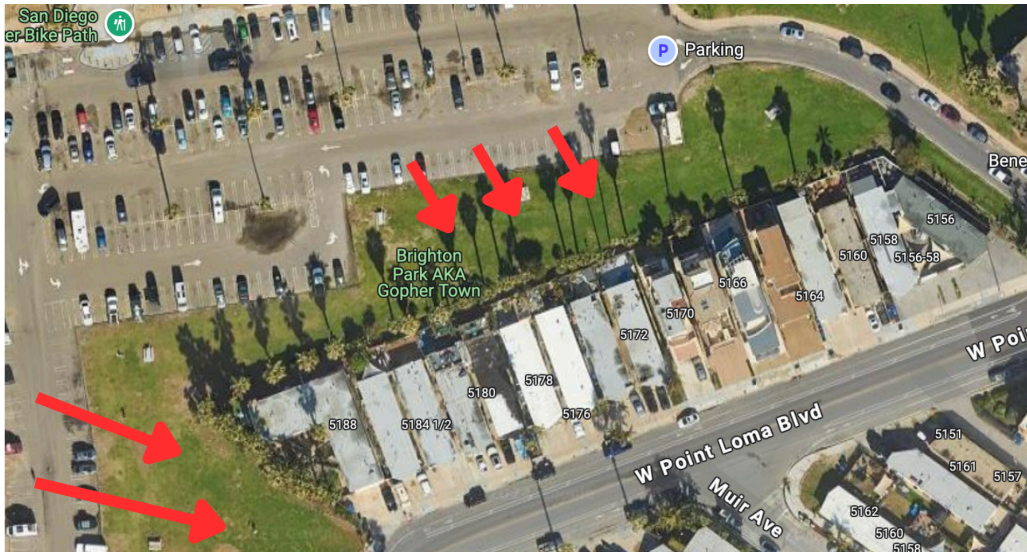
Thanks to a wider beach, Ocean Beach is less immediately threatened than Tourmaline or even La Jolla Shores. That said, we encourage a more detailed look at ways to reorient underutilized space in the Dog Beach parking lot to increase overall beach resilience. Brighton Park, which runs the entire length 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 and the undersigned organizations generally support 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 important 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 and native vegetation rather than for parking lots, especially when coupled with a concept that maintains an equal amount of parking spaces.

La Jolla Shores

Of the two concepts provided, we are more supportive of *B-2: Reconfigured Park* because the “floodable waterfront park” concept offers better sea level rise 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

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 it 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.



Conclusion

Surfrider and the undersigned organizations appreciate San Diego's forward-thinking approach and continued leadership in adding SLR resilience at its most popular beaches. Please consider our suggestions to maximize resilience and champion the most science-based, community-supported designs at each of the project locations to preserve public access, protect coastal ecosystems, and safeguard our shared shoreline for generations to come. Thank you for the opportunity to comment.

Sincerely,

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