

CALIFORNIA COASTAL COMMISSION

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W11a

2-15-1357-A1 (San Francisco Public Utilities Commission Armoring, Ocean Beach)

November 17, 2021

CORRESPONDENCE



November 12, 2021

To: Stephen Padilla, Chair, California Coastal Commission

CC: John Ainsworth, Executive Director, California Coastal Commission
Peter Benham, Coastal Program Analyst, California Coastal Commission

Re: Item W11a, Coastal Development Permit Amendment No, 2-15-1357-A1 – San Francisco Public Utilities Commission South Ocean Beach Permit Extension

Dear Chair Padilla,

On behalf of the Surfrider Foundation San Francisco chapter, we submit the following comments regarding the San Francisco Public Utility Commission's (SFPUC) proposed Coastal Development Permit Amendment 2-15-1357-A1 for a temporary permit extension. Surfrider's San Francisco Chapter has advocated for decades for the restoration of South Ocean Beach and played an integral role in the development of the Ocean Beach Master Plan (OBMP).

Surfrider does not object to the temporary permit extension of six months (through July 2022); however, we are concerned about the proposed 18 month delay as described in the staff report addendum. With such a substantial delay, it is imperative that the Commission give direction to the City to ensure the project design is consistent with the Ocean Beach Master Plan design concept.

Surfrider is concerned that the evolution of the coastal adaptation project for South Ocean Beach is a drastic departure from the original vision set forth in the OBMP. While we are excited that the project is now in the Environmental Impact Report (EIR) phase, we are deeply concerned that the SFPUC is proposing a much larger seawall structure than originally envisioned by the OBMP and a concrete cap structure rather than a cobble berm. We request the Commission address these concerns at the Wednesday, November 17, 2021 hearing so the time extension is used beneficially to design a project consistent with the Ocean Beach Master Plan, rather than resulting in further delays. Please see specific requests below.

The OBMP vision for South Ocean Beach includes landward relocation of the Great Highway, a living shoreline restoration project and a low profile buried seawall structure to protect the Lake Merced Tunnel – part of the City’s buried wastewater infrastructure.

In recent months, we testified during public comment to relay our concerns that the evolution of the coastal adaptation project for South Ocean Beach was not consistent with the work done through the OBMP stakeholder process. This testimony can be viewed on the [ActCoastal Youtube channel](#).

While we do not object overall to the time extension for such a significant long-term project, we urge Commissioners to direct the SFPUC to use this time to design the South Ocean Beach coastal resiliency project in a manner that preserves the OBMP goal to protect infrastructure in a way that maximizes beach restoration and preserves natural shoreline processes.

South Ocean Beach Permit History

In 2015, the City and County of San Francisco gained approval from the California Coastal Commission (CDP 2-15-1357) to keep unpermitted rip rap on the beach while the OBMP vision was under development. The permit was granted with the understanding that the City needed time to design, engineer and permit a project that would bring the OBMP vision into reality. A 2017 LCP amendment (LCP-2-SNF-18-0028-1) further promoted this work by requiring the City to develop and implement proactive adaptation measures at Sloat Boulevard with adaptation options that would include managed retreat and beach nourishment. LCP Policy 12.5 was added to require that shoreline devices be avoided. LCP Policy 12.5 states:

“Shoreline protection devices such as rock revetments and seawalls can negatively impact coastal resources... Because of these impacts, **shoreline protection devices shall be avoided and only implemented where less environmentally damaging alternatives are not feasible**. Shoreline protection devices such as rock revetments and seawalls shall be permitted only where necessary to protect existing critical infrastructure and existing development from a substantial risk of loss or major damage due to erosion and only where less environmentally damaging alternatives such as beach nourishment, dune restoration and managed retreat are determined to be infeasible.” ([Western Shoreline Area Plan](#), Chapter 12, emphasis added)

In 2015, Environmental Science Associates (ESA), et. al., developed a design concept based on the Ocean Beach Master Plan, [Coastal Protection Measures & Management](#)

[Strategy For South Ocean Beach - Ocean Beach Master Plan: Coastal Management Framework.](#)

At the heart of the developing coastal adaptation project was a low-profile buried seawall to protect threatened wastewater infrastructure. The wall, under average beach conditions, would be buried under sand, allowing wave run-up and sand transport to occur on top of and behind the structure. Reliance on sand replenishment would be minimized. The concept is depicted in Figure 4, below.

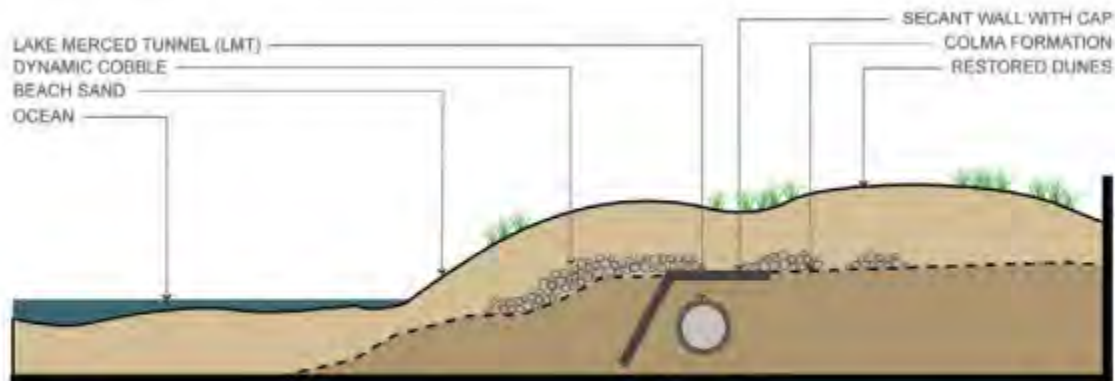


Figure 4
Ocean Beach Master Plan Vision and
Low-Profile Protection of the LMT In-Place

During heavy storm events with coastal erosion, it was expected that the shoreline elevation would drop, exposing the seawall up to ten feet, fronted with cobblestone that would aid in blocking wave run-up while providing protection of SFPUC infrastructure and public access. As spring and summer sand accretion processes returned, the wall would become reburied. In 2015, City engineers and SFPUC signed off on the analysis of this design, which concluded that such a low-profile structure would be viable and meet project objectives. Surfrider was in support of this project design and expected this to be the final design concept.

[New Design Not in Conformance with OBMP](#)

Instead, SFPUC commissioned a new conceptual design with Moffatt and Nichol, et.al., in 2019, *Conceptual Engineering Report: Ocean Beach Long-Term Improvements Project*. The City has already initiated the EIR process based on this new model and the “low profile wall” proposal we anticipated has been replaced with plans for an up to 45 foot wall, potentially twice the height of the vetted structure. The wall proposal is also now twice as wide (77 feet with a sloped shotcrete cap as opposed to the ESA 2015 conceptual model which was speculated at 36 feet wide with a flat cap). The new wall design would also sit 20 to 40 feet further seaward than originally proposed, where it is

likely increasing risk of exposure in this area of highly active wave energy. See figure ES-5 from Moffatt and Nichol in 2019, below.

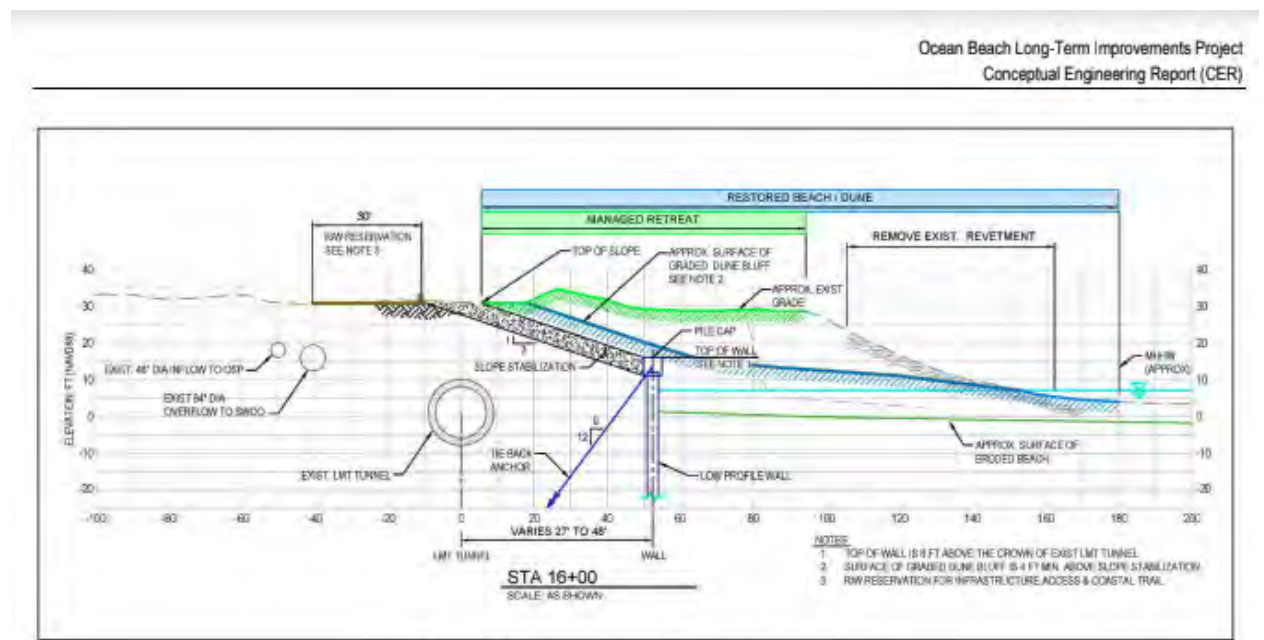


Figure ES-5: Low Profile Wall-Representative Section

This is not the adaptive project that was discussed in the OBMP process or the LCP Update, nor is it even a “least environmentally damaging alternative” that we have worked on collaboratively for at least the past five years. The new and much larger seawall plan, although initially covered with sand, would undoubtedly be much more prone to erosion. This means there could be a greater need for sand replenishment if it is to remain buried; and there is a higher probability that the structure will become a coastal access hazard when subjected to excavation due to erosion. With its wide sloped crown, the adaptive benefits of a living shoreline are also greatly diminished as sand retention and wave transport on top of and behind the structure are less viable. The new wall is clearly not in line with the OBMP vision.

The new design also suggests a soil stabilization layer composed of soil cement mixture to prevent scouring around the seawall. Surf rider has historically objected to similar cement mixtures. The staff report for application number 6-15-1988 regarding a seawall application in Solana Beach concedes that historically, erodible concrete has not eroded at the same rate as the bluffs. The Coastal Commission denied application 6-15-1988 because it would perpetuate a type of coastal armoring that has not been proven to erode as claimed by the applicant, and is instead likely to act as a ‘de facto’ seawall that erodes the beach.

Commission Action Needed

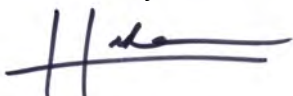
Surfrider requests that the Commission direct the SFPUC to use the permit extension time to design the South Ocean Beach coastal resiliency project in a manner that preserves the OBMP goal to protect infrastructure that maximizes beach restoration and preserves natural shoreline processes. We suggest Commissioners direct the following actions to the SFPUC:

1. Redirect SFPUC to explore opportunities for reinstating the 2015 design.
2. If the 2015 design is not fully restored after these steps, SFPUC should be required to specify which aspects of the design are not viable and provide analysis. Specifically, the Commission should:
 - a. Request additional analysis and scrutiny of the width, height, and location of the currently proposed seawall compared to original 2015 design;
 - b. Request additional analysis and scrutiny of the need, function and erodibility of the proposed soil stabilization layer compared to cobble berm in the original 2015 design;
 - c. Request additional analysis of the potential for a buried cobble berm for the seaward top ten feet of the buried seawall that will help maintain an accessible beach slope and living shoreline, instead of a steep drop off during periods of high sand erosion.
3. If a design faithful to the OBMP is not technically feasible, SFPUC should revisit a relocation alternative from the ESA 2015 analysis.

The current design resembles a conventional seawall. Undoubtedly, it threatens to undermine key OBMP goals of maximizing beach restoration, preservation, minimal sand replenishment maintenance; and safe access to/from the water. If going through the effort to relocate the Great Highway, a seawall should not remain in its place.

We urge Commissioners and staff to closely scrutinize the current SFPUC's seawall proposal; and to bring forth major changes that result in a project that truly honors the OBMP.

Sincerely,



Holden Hardcastle

Executive Committee Chair
San Francisco
Surfrider Foundation



Mandy Sackett

California Policy Coordinator
Surfrider Foundation

November 12, 2021

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
(sent via email)

RE: Public Comment on November 2021 Agenda Item Wednesday 11a -
Permit Amendment Application No. 2-15-1357-A1 (San Francisco Public
Utilities Commission Armoring, Ocean Beach)

Dear Commissioners,

The San Francisco Public Utilities Commission (SFPUC), on behalf of the City and County of San Francisco (CCSF), is writing to support the staff recommendation for Agenda Item Wednesday 11a – Permit Amendment Application No 2-15-1357-A1, which is a time extension for San Francisco’s Ocean Beach Climate Change Adaptation Project (Project), Phase 1, Short-term Improvements covered under CDP 2-15-1357. We would also like to ensure the Commission understands the challenges associated with the Project, status of design and estimated completion of CEQA.

This project represents one of CCSF’s first climate change adaptation projects to move towards construction. It is a CCSF project being led by the SFPUC. Climate change projects represent new and unique challenges both organizationally and technically. These challenges, in addition to the COVID-19 pandemic, have affected progress on project development. That said, CCSF is still committed to meeting an on-time submittal of the Phase 2, CDP Application due by December 31, 2021 as is outlined in CDP 2-15-1357.

The SFPUC, in coordination with SF Public Works, SFMTA, SF Recreation and Parks and numerous consultant teams completed 65% design in October 2021 and are preparing to release the Draft Environmental Impact Report (DEIR) in early December 2021. To meet these timelines, there has been extensive coordination on all elements of the project. As an example, the open space elements required extensive coordination with the National Park Service and

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Mayor

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Vice President

Sophie Maxwell
Commissioner

Tim Paulson
Commissioner

Ed Harrington
Commissioner

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General Manager



the SF Recreation and Parks Department. The aesthetics of the park, access, plantings, and parking are all being considered to provide the best possible user experience while keeping in mind the operational needs of the SFPUC's Wastewater System, sand management, coastal dynamics, stormwater management, emergency access, and sea level rise. In addition, CCSF is closely coordinating with Coastal Commission staff on elements of the project. For example, we are developing triggers for sand placement that would provide a minimum dry beach width and ensure that the proposed buried wall would remain as such or remedied quickly with sand nourishment. These details take time to develop, analyze under CEQA, reach agreement on, and bring to design.

That said, we want to make sure the Commission understands CCSF's timeline for completing CEQA and to reiterate that we are making a concerted effort to meet the timeline set out by CDP 2-15-1357. The Project requires extensive reports on coastal dynamics (analysis of the offshore bars and end effects), biological (Bank Swallows and potential dunes in the project area), traffic, and noise. These reports and analysis, in collaboration with our federal partners, took longer than anticipated and progress was affected by COVID-19.

When the SFPUC was charged with leading the implementation of this portion of the Ocean Beach Master Plan(OBMP), we took this responsibility seriously. That said, the SFPUC didn't realize that the unique features of the project would take longer to analyze and design (e.g., analyzing for resiliency to sea level rise). As an example, the Alternatives Analysis Report took much longer because it had to include climate change related analyses. This is not work that falls into the SFPUC's wheelhouse, which led to schedule delays (e.g., hiring technical experts and convening a technical advisory committee). While we did not plan for this length of time, we feel that the thoughtful analysis helped to propel the Phase 2 project to where we are today with confidence that this project will meet the vision as outlined in the OBMP; including managed retreat, sea-level rise resiliency, improved public access and protection of critical wastewater infrastructure.

Because of these challenges, the current schedule for CEQA is to complete the Notice of Determination by December 2022 - 6 months after the extension being sought today. We will continue to advance this work as quickly as possible, but it is uncertain if we will be able to beat this timeline given the complexity and level of public interest. Thus, we want the Commission to be aware that our estimated NOD completion date will likely hinder getting a final permit from the CCC by June 2022, as indicated in the staff report.

We appreciate the opportunity to ensure the Commission understands the challenges associated with the Project, status of design and estimated completion of CEQA

Sincerely,

Anna M. Roche

Anna M. Roche

Project Manager, Ocean Beach Climate Change Adaption Project

From: NorthCentralCoast@Coastal
To: Benham, Peter@Coastal
Subject: FW: Public Comment on November 2021 Agenda Item Wednesday 11a - Permit Amendment Application No. 2-15-1357-A1 (San Francisco Public Utilities Commission Armoring, Ocean Beach)
Date: Monday, November 15, 2021 8:57:39 AM

From: Bill McLaughlin <local415@gmail.com>
Sent: Friday, November 12, 2021 3:58 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on November 2021 Agenda Item Wednesday 11a - Permit Amendment Application No. 2-15-1357-A1 (San Francisco Public Utilities Commission Armoring, Ocean Beach)

This CDP should be approved only under the condition that the city and county of San Francisco redesign their project back in line with the vision and goals of the Ocean Beach Master Plan. If that is technically infeasible, then the city should pursue a relocation alternative for their threatened infrastructure.

About 10 years ago, in July of 2011, the state Coastal Commission unanimously denied San Francisco's permit to build a 30-foot conventional seawall at southern edge of Ocean Beach. In explaining their vote, the agency urged the city to find a more beach friendly solution to protect its threatened wastewater infrastructure.

To accomplish this task, a government / community stakeholder process was formed called the Ocean Beach Master Plan (OBMP). The OBMP was also overseen by Commission local district staff. I personally represented the Surfrider Foundation, San Francisco Chapter as a stakeholder.

By 2012, the OBMP recommended a small, low profile buried seawall to protect SFPUC infrastructure. The structure was to be low impact and allow for major beach and dune restoration as well as a living shoreline. Wave energy and sand transport were to take place on top of and behind the structure. Such natural processes would have aided beach accretion and minimized the need for costly and damaging sand replenishment.

In 2015, the Ocean Beach Master plan design was studied in an alternative analysis report. It was deemed viable by city engineers.

In 2017, a special LCP amendment was approved by the state Commission to specifically allow for the OBMP project.

However, on the eve of the Draft EIR, the SFPUC suddenly discovered new geological data which has disqualified the viability of the low-profile Master Plan seawall.

This is where we are presently. SFPUC is now proposing its own new structure, one that is twice as tall and more than twice the wide as the Ocean Beach Master Plan wall.

The size and shape of the newly proposed seawall completely undercuts the natural shoreline and beach preservation elements found in the Master Plan design.

This larger wall will almost certainly cause more scour, passive erosion and block wave overtopping. It looks to inhibit sand transport. Ironically, it averages 30 feet in height, the same height as the 2011 wall rejected by the Commission.

Furthermore, a bike and pedestrian path that should be located well inland from the water, is now attached to the seawall in the city's current design. Placing new infrastructure unnecessarily close to wave run-up directly undermines Coastal Commission goals for sea level rise adaption.

There are other problems with the current city design. There is an inadequate public parking plan, with only 55 spaces earmarked to be built nearly a mile away from the main / traditional access area. Note: Originally, there were 200 spaces between amongst two parking lots covering the north and south ends of the area.

In summary, this CDP should be approved, but conditioned to direct Commission staff to work with SFPUC towards redesigning the project back in line with the vision of the Ocean Beach Master Plan. Additionally, if a truly low-profile and low impact seawall is not feasible to protect wastewater infrastructure, then SFPUC should pursue one of the relocation alternatives as outlined in the 2015 alternative analysis report.

Sincerely,

Bill McLaughlin
Surfrider Foundation Member &
Ocean Beach Master Plan Stakeholder Representative