

## CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT  
455 MARKET STREET, SUITE 300  
SAN FRANCISCO, CA 94105  
PHONE: (415) 904-5260  
FAX: (415) 904-5400  
WEB: WWW.COASTAL.CA.GOV



# Th11c

Application No. 2-21-0912 (SFPUC Ocean Beach Armoring,  
San Francisco)

June 13, 2024

CORRESPONDENCE



June 10, 2024

Via Electronic Mail

California Coastal Commission  
 Attn. Dan Carl, District Director  
 455 Market Street, Suite 300  
 San Francisco, CA 94105

Subject: Request to Postpone Hearing for CDP Application 2-21-0291 (Ocean Beach Climate Change Adaptation Project)

Dear Director Carl:

This letter is being submitted on behalf of the City and County of San Francisco (the City) regarding the coastal development permit (CDP) application for the Ocean Beach Climate Change Adaptation Project (Project). The San Francisco Public Utilities Commission is the lead City agency for the Project. The CDP application for this Project is scheduled to be heard by the California Coastal Commission (Commission) at its June 2024 meeting. Commission staff is recommending approval of the Project with special conditions requiring substantial modifications to the Project.

The City appreciates that Commission staff shared a draft of the CDP special conditions the week before the staff report mailing deadline. As noted in the City's May 24 and 29 responses, the conditions call for Project modifications that have substantial cost, design, environmental review, and legal implications. Despite a concerted effort by the many affected City departments and Project partners, the City cannot fully assess the feasibility of such significant and complex modifications by the scheduled hearing date. As a result, the City will not be prepared to respond to the staff recommendation by the June 2024 meeting.

The City hereby requests a six-month postponement of the Commission's vote under California Code of Regulations section 13073(a) and waives any applicable time limits for Commission action on the application under section 13073(c). The City estimates that it may take approximately six months to complete its assessment of the special conditions, although the time for this review will ultimately depend on whether the City and Commission are able to work together productively in the coming months. In the intervening period, the City will continue working collaboratively with Commission staff to bring the CDP to hearing as soon as possible.

In the interest of continuing proactive shoreline management, protecting the Lake Merced Tunnel, and maintaining Coastal Act compliance, the City intends to seek temporary or emergency authorization to retain the existing shore

**London N. Breed**  
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**Anthony Rivera**  
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 Commissioner

**Kate H. Stacy**  
 Commissioner

**Dennis J. Herrera**  
 General Manager

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protection and continue ongoing sand and bluff management measures during the requested postponement period.

The Project is needed to protect critical wastewater infrastructure from coastal hazards. Inspired by the Ocean Beach Master Plan's vision, and consistent with the City's local coastal program, the Project incorporates managed retreat, beach nourishment, and sea-level rise adaptation. Ultimately, the Project represents the City's long-term strategy for protecting vulnerable public infrastructure while protecting and enhancing South Ocean Beach public access, recreation, habitat, and scenic quality.

The current Project design is the product of more than a decade of collaboration, planning, technical study, design, and environmental review. These initiatives, in which the City has invested millions of dollars and countless hours of staff time, include the 2012 Ocean Beach Master Plan, the 2015 Coastal Protection Measures and Management Strategy for South Ocean Beach, the 2017 Ocean Beach Open Space Landscape Design, the 2018 Alternatives Analysis Report, the 2019 Conceptual Engineering Report, the 2020 Sand Management Plan, the 2021 Geotechnical Interpretive Report, the 2021 Draft Environmental Impact Report, and the 2023 Final Environmental Impact Report, among others. Each of these documents is included in the City's December 2021 CDP application for the Project, and Commission staff participated in, commented on, or otherwise influenced their development.

Designing this quarter-of-a-billion-dollar Project has required extensive consultation, collaboration, and negotiation among several departments within the City and across multiple levels of government. For example, City departments affected by and involved in nearly every Project design decision include the San Francisco Public Utilities Commission, Planning Department, Recreation and Parks Department, Public Works, and Municipal Transportation Agency. Project design has also required extensive collaboration with the National Park Service, which owns and manages much of the Project area, including Ocean Beach and Fort Funston, as well as the California Department of Fish and Wildlife, among other state and federal agencies with jurisdiction.

The City also met with Commission staff on a regular basis between January 2019 and November 2023, at which time these meetings were discontinued at the direction of Commission staff. These meetings provided a forum for discussing the reports identified above, providing updates, and responding to questions on Project design, identifying Commission staff concerns, and ultimately working towards the development of an approvable project ahead of the June 2024 expiration date of the City's current CDP. These meetings helped identify a number of Commission staff's potential Coastal Act or local coastal program policy concerns early, allowing time for the City to coordinate among the various interested parties ahead of making design changes. This has helped shape the Project into one that is more aligned with the Coastal Act and Local Coastal Program policies.

These coordination efforts led the City to believe that the City and Commission staff substantially agreed on the majority of the Project elements. However, on May 20, 2024, less than eight working days before Commission staff's late mailing deadline for the June meeting, Commission staff provided the City with draft special conditions that suggest otherwise. Notably, as outlined in our May 24 and May 29 comments on the draft special conditions, the recommended revisions have substantial implications for Project feasibility, including with respect to cost, design, City policy, public safety, and environmental review. While the City appreciates Commission staff's attempt to address the City's initial comments on the draft conditions, we note that Commission staff also added additional, substantial requirements after receiving the City's comments.

A few examples of the significant changes to the Project that the special conditions require are:

- **Service Road** – the draft conditions call for elimination of the portion of the service road connecting two major critical infrastructure facilities. This portion of the service road is a retained portion of the Great Highway Extension that would be repurposed for continued essential wastewater system operations and maintenance access. Although the Commission revised the draft condition to now require that this should be accomplished “to the maximum extent feasible,” the intent is clearly to remove or relocate the road segment connecting the Westside Pump Station and Water Treatment Plant. The condition also recommends reduction of the size of the access road and multi-use trail that may not satisfy applicable Fire Code minimum width requirements for access roads to major facilities.
- **Public Access Amenities** – the draft conditions call for relocation and reconfiguration of the approximately 0.5-mile multi-use path, an additional stairway between the multi-use path and beach, and an additional restroom and electric vehicle charging stations in an expanded parking area where no utility connections currently exist, among other changes. The conditions also require Project amenities, such as the restroom and multi-use path, to remain open 24 hours per day, which conflicts with City policy and public health and safety imperatives.
- **Dune Habitat Restoration** – the draft conditions call for substantial changes to the layout and operation of the Project's landscape plan, which the City specifically and deliberately designed as a management-dependent, constructed ecosystem and managed landscape, rather than a restored natural dune landscape.
- **Shore Protection Term and Mitigation** – the draft conditions authorize the proposed shore protection system for 20 years from the date of the permit (i.e., until 2044). Under the current Project schedule, the wall would not be completed until approximately 2029, and the redesign required to comply with the conditions as currently drafted may delay the Project for up to a year. Thus, the conditions would authorize this roughly \$250 million Project for less than 15 years – more than 20 years less time than the Project's

financing term. The staff report does not clearly explain the rationale for such an abbreviated term and we would need staff to update the proposed project timeline for the project to reflect the delays caused by these permit conditions.

The staff report states the beach impacts over the shore protection system's authorized term (i.e., to 2044) would be valued at \$144 million. The City has a number of questions about the methodology and assumptions underlying this estimate, including the propriety of using current market value of developable property as a basis for property value within the Project area. Similarly, the assumptions underlying the assessment of loss of beach and shoreline use area are unclear; the Project site is an erosion hotspot that does not support a beach for many months of the year. Nor is it clear whether the analysis considered the City and Army Corp's placement of extensive sand on the Project site in 2021, or the fact that the Project will retreat shoreline armoring back from the bluff line, which would open significant new beach area that will be maintained via nourishment.

These examples by no means exhaust the list of Project modifications that the City will need to assess in the coming months.

As explained above, the Project elements that are the subject of Commission staff's requested revisions were described and analyzed in the reports listed above and provided to the Commission well in advance of the City's receipt of the May 2024 draft special conditions, including in the December 2021 CDP application and draft EIR, the October 2022 responses to Commission staff's comments on the CDP application, and the September 2023 Responses to Comments on the Draft EIR.

Because the proposed Project design resulted from extensive collaboration between a wide array of interested parties and stakeholders, implementing even one of these changes would take some time and coordination. For example, the addition of a stairway between the multi-use path and the beach would require modifying the City's pending easements and special use permits from the National Park Service, which may not even support construction of the additional stairway on federal land.

In addition, considering the interrelationship among Project elements, the City cannot adequately assess the feasibility and implications of many of these changes without additional design work. For example, eliminating or modifying the service road would require further modifications to the Sloat Boulevard and Skyline Boulevard intersections, as well as redesign of the parking lot access and layout. The addition of a restroom and electric vehicle charging stations would require further modification of the parking lot extent and layout, which may require cutting into the adjacent hillside and constructing a retaining wall, among other measures.

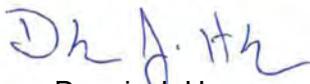
These changes may also require additional environmental review under the California Environmental Quality Act and National Environmental Policy Act, and modifications to regulatory permit applications. The changes may also affect the City's application for financing under the U.S. Environmental Protection Agency's Water Infrastructure Financing and Innovation Act and the Federal Emergency Management Agency's Building Resilient Infrastructure and Communities grant applications, which were submitted in June 2022 and February 2024, respectively.

For these reasons, the City will not be able to assess the feasibility of the draft special conditions in a way that allows for a meaningful response to the staff recommendation by the June 2024 meeting. Given the extent of the requested changes, the City estimates it will need approximately 6 months to fully understand the feasibility of implementing some of these conditions. The City requests the Commission's vote be postponed accordingly. While the City is not aware of any applicable time limits that would require Commission action on the application, it waives any such time limits.

The City regrets any delay that will result from this postponement request and remains committed to working with Commission staff to identify a permanent solution for this area. The City intends to continue proactive planning and management of South Ocean Beach in the interim and will seek to avoid a return to ad hoc responses following severe storm events. Toward that end, the City intends to seek temporary or emergency authorization to retain the existing shore protection and continue ongoing sand and bluff management measures consistent with the coastal resource protection measures identified in CDP 2-15-1357, as amended, during the requested postponement period.

Thank you for your consideration. Please let me know if you would like to discuss.

Sincerely,



Dennis J. Herrera  
General Manager

cc: Phil Ginsburg, General Manager, San Francisco Recreation and Park Department

Jeffrey Tumlin, Director, San Francisco Municipal Transportation Agency  
Anna Roche, Project Manager, Ocean Beach Climate Change Adaptation Project

**City and County of  
San Francisco**



**Board of Supervisors,  
President**

**AARON PESKIN**  
市參事 佩斯金

June 7, 2024

Kate Hucklebridge  
Executive Director, California Coastal Commission  
455 Market St, Suite 300,  
San Francisco, CA 94105

Dear Director Hucklebridge,

I am reaching out to express my support for preserving a beach South of Sloat at Ocean Beach in San Francisco, and endorse the commonsense adjustments to the proposed project by the San Francisco Public Utilities Commission (SFPUC) to consider resilient design in light of sea level rise put forward by Surfrider Foundation and other environmental advocates.

South Ocean Beach is an ‘erosion hotspot’ where the beach is quickly disappearing, and major wastewater infrastructure is vulnerable to sea level rise. The project proposed at this site is a critical opportunity to engage in climate adaptation needed to protect the beach, coastal access and clean water as sea levels rise.

The SFPUC project proposes to temporarily protect the beach by burying at 3,200 wall in front of the Lake Merced Tunnel to protect this sewage and stormwater infrastructure from sea level rise. However, SFPUC’s plan creates a new permanent structure which will eventually cause the erosion of the beach and does not consider a long-term plan for the relocation of this infrastructure.

SFPUC can achieve its important goals at South Ocean Beach including wastewater infrastructure protection, coastal viewing opportunities, and still put a more resilient project in place that considers the eventuality of managed retreat. I urge the coastal commission to consider the suggestions put forward by Surfrider and environmental advocates including:

- 1) Adjusted design of the seawall, stairways and multi-use path so that they are more easily relocated in the future; by making the bike path out of dirt instead of concrete and by using a slat-based design for the seawall
- 2) A more robust sand management plan to ensure the seawall remains buried in the short term and is not a significant source of erosion, and
- 3) A long-term sea level rise adaptation plan with strong triggers, monitoring and planning commitments towards relocation of the Lake Merced Tunnel before 2100.

**City and County of  
San Francisco**



**Board of Supervisors,  
President**

**AARON PESKIN**

市參事 佩斯金

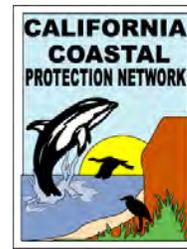
4) Removal of rubble and closure of the Great Highway Extension prior to construction without delay

Thank you for your careful stewardship of our precious coastal resources.

Sincerely,

A handwritten signature in black ink that reads "Aaron Peskin".

Aaron Peskin



June 7, 2024

To: Caryl Hart, Chair, California Coastal Commission  
Cc: Stephanie Rexing, Dan Carl, Staff, California Coastal Commission

**Re: Item 2-21-0912, SFPUC Ocean Beach Armoring, TH 11c**

Dear Chair Hart,

The Surfrider Foundation, California Coastal Protection Network and Natural Resources Defense Council strongly support preserving a beach South of Sloat at Ocean Beach in San Francisco. We are asking the Commission to require additional studies and an updated design proposal in order to facilitate a resilient project that is over a decade in the making in South Ocean Beach.

The South Ocean Beach Climate Adaptation Project was once expected to be a poster child for strong sea level rise planning. Of particular note, the Ocean Beach Master Plan in 2012 clearly designated preservation of the beach and coastal access as key priorities for achieving resilience in the area. The Coastal Commission has also had a thirty-year history of encouraging SFPUC to manage known erosion issues in the area with non-armoring alternatives since the Lake Merced Tunnel was placed too close to the ocean in the 1990s.

Now, as sea level rise is forcing a need for immediate resilience building, San Francisco has an opportunity to show what phased adaptation to protect a beach looks like in practice. The proposed dune in this project is based on top of a mile-long seawall set too close to the ocean and 20 feet above sea level in some places — the wall will frequently become exposed and will exacerbate erosion in a known erosion hotspot.

While we celebrate the removal of rubble at South Ocean Beach, the connection of the California Coastal trail, the upgraded restrooms, and parking that the project provides, we do not consider this project a nature-based project — it is a gray infrastructure project with access components and with green components.

Our groups are confident that an adjusted version of The Ocean Beach Climate Adaptation Project can and should instead be a *model* for phased adaptation that protects the public trust. Such a project will not only preserve an iconic stretch of coastline serving the Bay Area's 7.3 million residents, it will show that beaches in California can be preserved when they benefit from long-term planning and vision setting. This is appropriate especially given the Commission's longstanding guidance on

this project, and the \$144 million impact that the Staff Report correctly finds the armoring will have on Ocean Beach<sup>1</sup>. **Due to the great importance of this project to sea level rise planning in California and San Francisco's Ocean Beach in particular, our groups ask the Coastal Commission to:**

1) Scrutinize the size and location of the proposed 3,200 foot seawall to determine whether it can be smaller or more landward so as to have less impact on the beach. A groundwater study must be required to support SFPUC's rationale that the extent of the gray infrastructure in the wall and path are necessary to address seismic and groundwater concerns.

2) The project must be redesigned as a nature based solution that puts dune creation and maintenance as a coequal goal to infrastructure replacement. The current proposal utilizes sand to cover an enormous seawall, but that is not the same as a carefully designed, resilient dune habitat that meets biodiversity and beach protection objectives. The SFPUC, working with Coastal Commission staff, must be required to develop a hybrid nature based solution that protects the beach and enhances biodiversity as soon as feasible.

2) Require an updated adaptation plan that specifies when SFPUC plans to relocate the Lake Merced Tunnel off the public beach, which should include necessary milestones needed to be achieved to ensure that relocation is physically and financially possible in the timeframe designated. Creation of this plan should precede project approval.

3) Require an adjusted path design that is able to facilitate the eventual relocation of the multi-use path, stairways, and LMT. We recommend forming the bike path out of dirt, as the Ocean Beach Master Plan states that coastal access should be akin to nature-based projects in Crissy Field or Land's End.

4) Support prior to construction conditions which include removal of the rubble on the beach and closure of the Great Highway Extension to traffic.

We support and appreciate many strong conditions in the staff report, including the condition which dictates that the seawall permit expires in 20 years, as well as the condition concerning removal of the unnecessary planned service road. We also strongly support the Beach Protection Plan outlined in condition 4, however we have a fundamental concern that the proposed sand management plan and triggers for keeping the seawall buried are simply unrealistic for maintaining a beach in the long-term; given the location of the seawall and the wave energy at Ocean Beach. The fundamental project design must be adjusted so that all the related infrastructure can be relocated in a planned manner.

## **A Soft Solution Has Been Expected Here Since the 1990s**

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<sup>1</sup> [Staff Report](#) page 60

The Coastal Commission has directed SFPUC to limit armoring at South Ocean Beach since it authorized construction of the Lake Merced Tunnel in the 90s. The Commission conditioned the LMT to be protected via beach nourishment, not armoring.<sup>2</sup> Assurances to keep the tunnel buried “fell by the wayside,” according to the Staff Report, and in 1997, SFPUC illegally placed at least 600 feet of rock revetment near Sloat without a CDP, then adding an additional 440 feet in 2010 via an emergency permit.<sup>3</sup>

The Commission denied the after-the-fact authorization applications for the armoring, again encouraging the City to develop a non - armoring alternative. Even the Coastal Commission’s 2011 permits for temporary emergency measures to protect the Great Highway Extension from storm damage were conditioned on the development of a long term solution for the area that prioritized a non-armoring alternative<sup>4</sup>.

The City and County of San Francisco have also long awaited a nature-based project at South Ocean Beach. In 2018, the City amended its LCP to address the need for managed retreat in this area, allowing for armoring only if necessary to prevent damage to the LMT and only if “less environmentally damaging alternatives are determined to be infeasible.”<sup>5</sup> The Ocean Beach Master Plan, which involved a multi-stakeholder community-driven process, also proposed introducing “native dune morphology” via managed retreat of infrastructure and prioritized “improving recreational access, ecological function and character, in keeping with its [Ocean Beach’s] status as a national park.”<sup>6</sup>

Finally, under a 2014 settlement agreement between the California Coastal Protection Network (CCPN) and the City and County of San Francisco, the City agreed to initiate a Long-term Adaptive Management Plan (LAMP) for the South Reach of Ocean Beach that “preserves recreational opportunities, complies with all applicable land use and environmental laws and regulations, and contemplates a managed retreat in the face of expected sea level rise.”<sup>7</sup>

In other words, SFPUC has been expected to do everything within its power to avoid armoring of the Lake Merced Tunnel since it was built too close to the ocean in the 1990s, after the Coastal Act was passed.

Coastal Commission staff commented on SFPUC’s Draft Environmental Impact Report in 2022 preceding SFPUC’s application for this project, stating instead that the proposal “cannot be considered the environmentally superior alternative” and that “a true ‘no project’ alternative..needs to be framed and explored differently.”<sup>8</sup> Little has changed

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<sup>2</sup> [Staff Report](#), page 2

<sup>3</sup> [Staff Report](#), page 34

<sup>4</sup> [Staff Report](#), page 37

<sup>5</sup> Policy 12.1(f) Permit shoreline protection devices if necessary to protect coastal water quality and public health by preventing damage to existing wastewater and stormwater infrastructure due to shoreline erosion only when less environmentally damaging alternatives are determined to be infeasible.

<sup>6</sup> Ocean Beach Master Plan, V-16

<sup>7</sup> Exhibit 7, Settlement Agreement <https://documents.coastal.ca.gov/reports/2015/11/th14b-11-2015.pdf>

<sup>8</sup> [Coastal Commission Comment Letter on Draft EIR](#)

about the project since the EIR was completed and the project proposal remains essentially founded upon a mile-long seawall backed by a large concrete trail.

### **The State Supports “Nature-Based Solutions”**

The Ocean Protection Council’s Sea Level Rise Action Plan emphasizes nature-based solutions as critical for sea level rise planning in California. The Action Plan states that:

“Nature-based solutions must be prioritized as feasible. Nature-based solutions are the prioritized method for SLR adaptation pursuant to existing state policy. These include vegetated dunes, living shorelines, and wetlands and marsh restoration. Gray infrastructure such as seawalls and hard armoring should be used only as a last resort after nature-based solutions have been exhausted. Strategic relocation, as feasible, should be implemented where needed.”<sup>9</sup>

While many state agencies generally afford the idea that some ‘hybrid’ green-gray approaches can still qualify as nature-based projects, the defining characteristic of a nature-based project is that it provides multiple cost-effective benefits; such as providing effective protection against erosion, requiring less maintenance over time, and providing resilient and sustainable coastal protection. None of these characteristics can be applied to SFPUC’s proposed project at South Ocean Beach as the composition of the dune is clearly described in the Staff Report as needing frequent maintenance.

The Coastal Conservancy’s “Baylands and Climate Change: What Can We Do” Report describes how natural infrastructure can be used to protect shoreline communities from coastal flooding while providing other benefits such as water filtration, habitat and recreation, and cautions against seawalls. The Coastal Commission is also detailed in its guidance to discourage armoring and similarly prescribes dunes as one kind of nature-based solution that can help a community develop long-term resilience against sea level rise. The Commission’s Sea Level Rise Guidance describes dunes as providing “buffers against erosion and flooding by trapping windblown sand, storing excess beach sand, and protecting inland areas, and they also provide habitat.”<sup>10</sup>

In short, coastal agencies in the State of California encourage nature-based solutions because they build resilience for public trust spaces, provide their own flood protection and are cheaper in the long-run to maintain. These characteristics are not applicable to SFPUC’s project proposal.

### **The Proposed Project is Not a Nature-Based Project**

Our number one concern about this project is that the sandy area envisioned in this project is not dynamic and will not prevent against erosion in the long-term. Instead, the sand will have to be highly maintained in order to preserve periodic benefits to habitat and potential recreation (if the sand is not absent or deeply scarped.) As the cost of maintenance goes up, a detailed plan for relocation of the project and of the Lake

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<sup>9</sup> [SLR Action Plan](#), page 7

<sup>10</sup> [SLR Policy Guidance](#), page 29

Merced Tunnel is also needed to determine at what point it is simply cheaper to move the tunnel. We appreciate that the staff report has outlined strong conditions for maintaining the beach and keeping the wall buried, but we question the reality that this is feasible at South Ocean Beach or will be enforced as these problems get worse all along the coast. A conversion of the multi-use path and commitment to relocation of the seawall and LMT would address these concerns.

According to the Staff Report, the project involves a significant amount of concrete being placed near the ocean. Elements include:

- **3,200 foot seawall**, in places up to 20 feet above sea level. The seawall will be located roughly where the current armoring exists. This is typically inundated on anything other than a low tide, and USGS studies show that a single storm event in sections of this beach can cause up to 30 feet of shoreline erosion<sup>11</sup>
- **Cement layer (SSL)** that stretches from the concrete path to the lower end of the proposed dune and is meant to hold sand in place. This Soil Stabilization Layer is meant to have a 4-foot-thick layer of sand on top of it, with vegetation. The sand will sit at a 3:1 slope.
- **3 locations of a deep soil mixing** to stabilize the bluff inland of the seawall
- **4,000 foot long path**, varying from 15 to 20 feet wide
- **18-inch wide retaining wall** to provide seating and ocean viewing
- **A beach access stairway** attached by concrete

Taken together, these elements represent a project that will be very difficult and expensive to move — particularly if these features are allowed to exist until sea levels have fully inundated the beach. Even the Staff Report's suggested permitted timeline will likely make removal very difficult, given the proximity of the proposed structures to the location of the tide line today.

The applicant proposes to keep the wall buried and maintain the beach in order to provide multiple benefits including to avoid exacerbating known erosion in the area. However, the sand management plan required to keep the wall buried suggests that the proposed dune will be difficult and expensive to maintain. The sand management plan proposes:

- Scheduled sand replenishments from North Ocean Beach every 2-8 years
- Dredged sand as replenishments every 4-10 years in milder years
- Repeated small placements of sand in milder years from North OB
- Non-scheduled large sand replenishments during severe storm years when certain triggers occur, like when beach width is less than 50 feet over 500 linear feet of beach

SFPUC's application proposed that the wall be able to be exposed at least some of the time, with the sand management plan outlining:

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<sup>11</sup> Page 55 staff report

- A trigger if 500 feet or more of buried seawall is exposed, requiring placement of emergency sandbags;
- Statement that nourishment would not be implemented if the beach recovers naturally during 12 months between June 1 measurement

In other words, Condition #4 in the Staff Report concerning a Beach Protection Plan is critical and an enormous improvement from the applicant's proposal because the applicant proposed that the wall could be exposed for up to one year at a time with no replenishment, whereas Condition 4 requires it to be covered.

However, our concern is that keeping the wall covered will be expensive and difficult — even more so than the applicant has estimated because the model used to determine how much nourishment would be needed in the area over time did not appear to include the seawall as an erosive factor. The need to highly manage the proposed dune and periodic exposure of the seawall do not live up to the characteristics of a nature-based project that the state is trying to encourage. Rather than build resilience over time, there is clear risk that this project will lose resilience as the cost of bringing sand to South Ocean Beach rises, storms increase, sea levels rise, and the wall becomes exposed more and more often.

### **The Right Project for this Area Would Use Phased Adaptation to Maximize Benefits of a Nature-Based Project**

In its recently updated Sea Level Rise Science and Policy Guidance, OPC includes consideration of phased adaptation via adaptation pathways as a critical step in sea level rise planning. The Guidance describes the purpose of phased adaptation planning as “allowing a community to build resilience over time.”<sup>12</sup> It is generally understood that phased adaptation involves implementing measures that can be adjusted over time, which can allow for a more sustainable and resilient response to coastal hazards compared to rigid, one-time solutions like seawalls.

We agree with the Staff Report in stating that “this project would appear to be the perfect opportunity to move a piece of critical infrastructure inland, allow the bluff to naturally retreat to maintain beach widths, and to effectively solve the potential danger to the LMT in perpetuity.”<sup>13</sup> However, we disagree with the conclusion that the project can be found consistent with the Coastal Act because a piece of critical infrastructure is in danger of erosion.

As Surfrider pointed out in a 2022 comment letter on the the EIR for this project, and which the Coastal Commission staff also pointed out in its own letter and in the staff report for this application, the proposed project is not the ‘least environmentally damaging alternative’ because the “least environmentally damaging alternative was not thoroughly studied in the EIR. As the staff report points out, the alternatives studied in

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<sup>12</sup> [OPC 2024 Sea Level Rise Science and Policy Guidance](#)

<sup>13</sup> [Staff Report](#), page 60

the EIR are critically flawed — beginning with the fact that a true no project alternative was not studied. Relocation of vulnerable infrastructure was not properly studied, as the cost-benefit analysis was not up to date, did not include major pieces of infrastructure, and was based on cost estimates that even the staff report describes as “unclear.”

Assuming that relocation is too expensive is not acceptable in the current era in sea level rise planning, in which the state is hinging our hopes that public trust land will be preserved on phased adaptation that can buy time to create space and finances for nature-based solutions like living shorelines. Relocation should have been properly analyzed in this project’s EIR, and this staff report should set a date at which relocation will and must happen, as well as permit a more ‘green’ project with less concrete that can realistically be moved in a phased way over the identified time period.

As quoted in the staff report, the 2018 California Coastal Commission Sea Level Rise Policy Guidance encourages “both siting infrastructure, especially wastewater infrastructure, away from areas threatened by sea level rise and other coastal hazards over the life of the infrastructure, as well as phased movement of infrastructure inland as areas are further threatened by sea level rise.”<sup>14</sup> Similarly the Ocean Protection Council’s Updated Sea Level Rise Guidance identifies phased adaptation as a critical step that planners should consider to increase resilience in response to sea level rise planning<sup>15</sup>.

In order to commit to phased adaptation, this project should begin with a commitment to relocation of vulnerable infrastructure at a set date in time. A plan should then be devised to meet that relocation commitment, and the project set in motion today should be one that is capable of being relocated, with significantly greener elements than the one being proposed.

## **Conclusion**

Thank you for considering our analysis of this project, which has been developed from within the Ocean Beach community over the past ten years. We urge you to request updated studies and design to facilitate a true nature-based project for this iconic stretch of Ocean Beach.

Best,

Laura Walsh  
California Policy Manager  
Surfrider Foundation

Mark Gold  
Director, Water Scarcity Solutions

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<sup>14</sup> Staff report, page 60

<sup>15</sup> [OPC SLR Guidance 2024](#)

Natural Resources Defense Council

Susan Jordan

Executive Director

California Coastal Protection Network



June 10, 2024

Dr. Caryl Hart, Chair  
California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105

**Re: Item 11.C SFPUC Ocean Beach Armoring (Application No. 2-21-0912)**

Dear Chair Hart and Commissioners,

The San Mateo County Chapter of Surfrider Foundation is dedicated to the protection, access and stewardship of our beautiful shoreline and beaches for everyone to enjoy. Many people in the Bay Area including many of our members visit Ocean Beach to surf, participate in beach cleanups, and to enjoy other forms of beach recreation. Our Chapter opposes the SFPUC's current proposal to install significant armoring at South Ocean Beach. This project would put Ocean Beach on a trajectory for increased erosion and damage to the iconic long sandy beach that has historically served San Francisco residents and visitors for decades.

Ocean Beach serves many forms of recreation for those who enjoy the sand and the waves. It is an important area for access to the beach and water for everyone, but especially the City's less privileged residents, leveling the access to allow anyone to enjoy, whether they surf, kayak, body board, play in the tidal zone, or simply enjoy the sandy beach for frisbee or a picnic or just walking on the sand. It is a large outdoor space at the edge of an urban landscape, allowing people to enjoy nature and the ocean. The large numbers of people who use this beach every week speaks for itself. Unfortunately, SFPUC's current proposal doesn't prioritize protecting the beach nor the beach access it affords to all Bay Area residents over the long term.

Continuing to endanger this resource with hard armoring and fixing the back of the beach, does a disservice to those residents who would otherwise have to travel outside of San Francisco to find a beach of this magnitude. All of our beaches are challenged by increasing storm frequency, intensity and sea level rise, and science has demonstrated that natural solutions buy more time and are more effective overall in preserving beaches on our shorelines. The beach is a dynamic and ever changing environment; attempting to create a static, unmoving interface will only result in destroying the many recreational benefits that Ocean Beach brings to the City.

The SFPUC's Ocean Beach Climate Adaptation Project is a conventional seawall. It is not what the Commission requested of the SFPUC when denying that agency to build a seawall in July 2011. The Commission requested that SFPUC work with all stakeholders on a more beach-friendly plan. That became the Ocean Beach Master plan recommendation: a living,

ecologically functional shoreline. This current project doesn't embody the intent of the Ocean Beach Master Plan that people came together around. The City of San Francisco and the SFPUC have consistently failed to protect the beach, and the current issues are a direct result of failed armoring fixes. More of the same is likely to yield similar failures, beach loss, and even more armoring at ever increasing and greater scale.

Most of the proposed seawall would be set up right against the wave run up zone, on a shoreline that is actively eroding. If approved and built, climate change driven storm activity and sea level rise will continue to impact the seawall and the infrastructure it seeks to protect. We appreciate the efforts of Commission staff to suggest mitigations for some of the issues within this problematic and damaging plan, but it may not be enough to offset the impacts of the proposed armoring. Even with substantial regular sand replenishment as conditioned by staff, – assuming the sand replenishment is even financially sustainable – it is likely the remaining beach will disappear completely in the coming years as a result of reliance on armoring.

Ocean Beach is part of San Francisco's history and should be protected by engaging natural solutions to slow erosion. The shoreline infrastructure, including the wastewater treatment facility, can be moved over time with adequate planning, but the beach cannot be replaced if it is lost to armoring. There will sadly always be more concrete and pavement to be found to drive or ride on, but our beaches, especially the iconic and historic Ocean Beach, cannot be replaced. While few would mourn the loss of a paved road or the relocation of a wastewater treatment facility, most everyone would mourn the loss of a beloved beach. We ask you to consider its value to all beach users, especially those who access the beach itself. Viewing the water from a mass of pavement and concrete doesn't convey the same benefits.

Please deny the coastal development permit for the SFPUC's proposed Ocean Beach Climate Adaptation Project and instead, encourage SFPUC to work with all stakeholders as the Commission originally envisioned with the Ocean Beach Master Plan, to prioritize nature-based solutions and infrastructure realignment for protection of the beach for everyone.

Sincerely,



Kimberly Williams  
Volunteer Policy Manager  
San Mateo County Chapter  
Surfrider Foundation

cc: Kate Huckelbridge, Executive Director, California Coastal Commission  
Dan Carl, District Director, North Central Coast District  
Rexing, Stephanie, District Manager, North Central Coast District  
Julia Koppman Norton, District Supervisor, North Central Coast District  
Oceane Ringuette, District Supervisor, North Central Coast District

**From:** [Henningsen, Luke@Coastal](mailto:Henningsen_Luke@Coastal)  
**To:** [Travis, Galen@Coastal](mailto:Travis_Galen@Coastal)  
**Subject:** Fw: Surfrider, NRDC and CCPN Comments on the Ocean Beach Seawall  
**Date:** Monday, June 10, 2024 9:18:31 AM  
**Attachments:** [NGOs Restore Sloat.pdf](#)

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**From:** Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>  
**Sent:** Monday, June 10, 2024 9:11 AM  
**To:** Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>  
**Cc:** Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>  
**Subject:** FW: Surfrider, NRDC and CCPN Comments on the Ocean Beach Seawall

For correspondence.

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Stephanie R. Rexing

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**From:** Laura Walsh <lwalsh@surfrider.org>  
**Sent:** Friday, June 7, 2024 5:11 PM  
**To:** Aguirre, Paloma@Coastal <paloma.aguirre@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Notthoff, Ann@Coastal <ann.notthoff@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Cummings, Justin@Coastal <justin.cummings@coastal.ca.gov>; Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>  
**Cc:** Susan Jordan <sjordan@coastaladvocates.com>; Gold, Mark <mgold@nrdc.org>; Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>  
**Subject:** Re: Surfrider, NRDC and CCPN Comments on the Ocean Beach Seawall

I am also attaching an additional shorter letter on the Ocean Beach Seawall project on behalf of the below organizations.

Azul  
EAC West Marin  
Salted Roots  
Surfrider Foundation  
Great Highway Park  
Resource Renewal Institute

Thank you for your consideration.

Best,  
Laura W.

On Fri, Jun 7, 2024 at 4:56 PM Laura Walsh <[lwalsh@surfrider.org](mailto:lwalsh@surfrider.org)> wrote:

Dear Commissioners -

Please see attached Surfrider Foundation, the California Coastal Protection Network and NRDC's comments on the important sea level rise planning project at Ocean Beach. We urge you to request updated studies and design plans in order to facilitate a meaningful phased adaptation project in San Francisco that is more consistent with the last ten years of community visioning for this area.

Best,  
Laura W.

--

Laura Walsh | California Policy Manager | [Surfrider Foundation](https://www.surfrider.org) | she/her/hers  
702.521.8196 | [lwalsh@surfrider.org](mailto:lwalsh@surfrider.org)

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Laura Walsh | California Policy Manager | [Surfrider Foundation](https://www.surfrider.org) | she/her/hers  
702.521.8196 | [lwalsh@surfrider.org](mailto:lwalsh@surfrider.org)



June 7, 2024

To: Caryl Hart, Chair, California Coastal Commission

Cc: Stephanie Rexing, Dan Carl, Staff, California Coastal Commission

**Re: Item 2-21-0912, SFPUC Ocean Beach Armoring, TH 11c**

Dear Chair Hart,

The undersigned organizations support preserving a beach South of Sloat at Ocean Beach in San Francisco. **We are asking that the proposed project by the San Francisco Public Utilities Commission (SFPUC) be adjusted towards a more resilient design in light of sea level rise.**

**Background:**

South Ocean Beach is an 'erosion hotspot' where the beach is quickly disappearing and major wastewater infrastructure is vulnerable to sea level rise. The Surfrider Foundation has looked forward to a climate adaptation project at South Ocean Beach for more than ten years because action is needed to protect the beach, coastal access and clean water as sea levels rise, however we are concerned that the current project proposal will result in a lost beach.

**What the City is Planning:**

SFPUC is proposing to remove the rubble currently on the beach around Sloat. They also plan to remove the Great Highway Extension because it is too close to the ocean. Their project then proposes to place a 3,200 foot long wall in front of the Lake Merced Tunnel (running along the coast) to protect this sewage and stormwater infrastructure from sea level rise. They propose to bury the wall in sand and vegetate the slope. SFPUC also plans to replace the inland half of the Great Highway Extension with a trail for coastal viewing, biking, and walking. Traffic will be rerouted around the zoo and 60 parking spaces will be added.

**Our Position:**

Our groups are concerned that placing a large amount of concrete very close to the ocean will result in the loss of the beach South of Sloat as sea levels rise. In particular, the mile long concrete wall and concrete pedestrian path will be very difficult to remove as sea levels rise and the wall itself will be an additional source of erosion when it is exposed; the beach is likely to be lost and potentially not recoverable in the near future.

SFPUC can achieve its important goals at South OB including wastewater infrastructure protection, coastal viewing opportunities, etc and still put a more *resilient* project in place. We are asking for:

1) Adjusted design of the seawall, stairways and multi-use path so that they are more easily relocated in the future; ie by making the bike path out of dirt instead of concrete

2) Strong commitments that the robust sand management plan outlined in Special Condition 4 are achievable — to ensure the seawall remains buried in the short term and is not a significant source of erosion

3) A long-term sea level rise adaptation plan with strong triggers, monitoring and planning commitments towards relocation of the Lake Merced Tunnel before 2100.

4) Removal of rubble and closure of the Great Highway Extension prior to construction without delay

We cannot support a project without all of these conditions.

Best,

Laura Walsh  
California Policy Manager  
Surfrider Foundation

Lucas Lux  
Executive Director  
Great Highway Park

Chase Cutrano  
Director of Programs  
Resources Renewal Institute

Tomas Valadez  
California Policy Associate

Azul

Adriana Guerrero - Nardone  
Executive Director  
Salted Roots

Ashley Eagle Gibbs  
Executive Director  
EAC West Marin

**From:** [Henningsen, Luke@Coastal](mailto:Henningsen_Luke@Coastal)  
**To:** [Travis, Galen@Coastal](mailto:Travis_Galen@Coastal)  
**Cc:** [Rexing, Stephanie@Coastal](mailto:Rexing_Stephanie@Coastal)  
**Subject:** Fw: Re Ocean Beach Armoring Project  
**Date:** Friday, June 7, 2024 1:52:29 PM  
**Attachments:** [Sloat Armoring Letter.pdf](#)

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**From:** Lucas Lux <lucas@greathighwaypark.com>

**Sent:** Friday, June 7, 2024 1:35 PM

**To:** Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Lowenberg, Susan@Coastal <Susan.Lowenberg@coastal.ca.gov>; Notthoff, Ann@Coastal <ann.notthoff@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Aguirre, Paloma@Coastal <paloma.aguirre@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Cummings, Justin@Coastal <justin.cummings@coastal.ca.gov>; O'Malley, Matt@Coastal <matt.omalley@coastal.ca.gov>; Uranga, Juan@Coastal <Juan.Uranga@coastal.ca.gov>

**Cc:** Zach Lipton <zach@greathighwaypark.com>; Parker Day <parker@greathighwaypark.com>; Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>; NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; Laura Walsh <lwalsh@surfrider.org>

**Subject:** Re Ocean Beach Armoring Project

Commissioners,

Attached please find a letter regarding the proposed Ocean Beach Armoring project on behalf of Friends of Great Highway Park. In short, we:

1. Support the conditions described in the staff report, and urge further adjustments to the project to address the concerns raised by the Surfrider Foundation; and
2. To protect the coast from continued erosion at a known "erosion hotspot" where all parties agree a project is urgently needed, and to improve public access to a currently blighted portion of the coast, we urge the immediate approval of preliminary work at the site including clearance of debris and closure of the roadway - currently falling into the ocean - to through traffic.

Thank you for your consideration of this matter.

Best,  
Lucas Lux

President, Friends of Great Highway Park



Dear Commissioners,

Friends of Great Highway Park is an all-volunteer nonprofit that is focused on maximizing coastal access along San Francisco's Great Highway. On behalf of our more than 10,000 supporters, we are writing to:

- **Support the Concerns Expressed by Surfrider.** We support the conditions recommended by Coastal Commission staff, and share further concerns over the proposed project design highlighted by the Surfrider Foundation, including the lack of adaptive management strategies and reliance on concrete infrastructure, threatening future generations' access to and enjoyment of the coast. The conditions listed in the staff report are a great first step to address the long-term health of this section of the coast; we further urge the Coastal Commission to ensure the concerns emphasized by the Surfrider Foundation are addressed.
- **Urge Approval with Prior-to-Construction Conditions.** The above being said, we have significant concerns with delaying the issuance of the permit in its entirety, which would be the effect of the staff's recommendation to require revised plans for the project before the issuance of the permit. The project area is a coastal erosion hotspot; portions of the roadway have already fallen into the ocean, and portions of the adjacent beach are fenced off and littered with debris, degrading public access. The project has been in the works for over one decade; further delays will exacerbate the impacts of erosion. All parties agree that a project is urgently needed to protect the coast and the wastewater treatment infrastructure. Many of the conditions recommended by the Coastal Commission staff report require significant design changes, which may take a long time to make. While the SFPUC works to address the serious concerns raised in the Coastal Commission staff report, we urge the Coastal Commission to allow preliminary and preparatory project work to begin, including closing the roadway to private vehicle traffic, removing rubble and other debris from the coast, and change Special Conditions 1-5 and 7 to be prior-to-construction conditions.

Thank you for your consideration, and for your stewardship of this important piece of our collective coastline.

Best,

Lucas Lux  
President, Friends of Great Highway Park

**From:** [Henningsen, Luke@Coastal](mailto:Henningsen_Luke@Coastal)  
**To:** [Carl, Dan@Coastal](mailto:Carl.Dan@Coastal); [Rexing, Stephanie@Coastal](mailto:Rexing_Stephanie@Coastal)  
**Cc:** [Travis, Galen@Coastal](mailto:Travis_Galen@Coastal)  
**Subject:** Re: Public Comment on Behalf of the Sierra Club Bay Chapter\_Item 11c: Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Friday, June 7, 2024 12:26:13 PM  
**Attachments:** [06\\_13\\_24\\_CCC\\_Item\\_11c\\_Application\\_No.2-21-0912\(SFPUC\\_Ocean\\_Beach\\_Armoring\\_San\\_Francisco\).pdf](#)

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**From:** Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>  
**Sent:** Friday, June 7, 2024 12:18 PM  
**To:** Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>  
**Subject:** FW: Public Comment on Behalf of the Sierra Club Bay Chapter\_Item 11c: Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)

FYI and for correspondence file

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**From:** Scott Webb <scottwebb02@gmail.com>  
**Date:** Friday, June 7, 2024 at 12:15 PM  
**To:** Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>, NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>, jonathan.goldberg@sfgov.org <jonathan.goldberg@sfgov.org>, nate.horrell@sfgov.org <nate.horrell@sfgov.org>, aroche@sfgov.org <aroche@sfgov.org>, Sarah Ranney <sarah.ranney@sierraclub.org>, Martha Kreeger <marthakreeger@gmail.com>, Charles Whitfield <whitfield.cw@gmail.com>, mayorlondonbreed@sfgov.org <mayorlondonbreed@sfgov.org>  
**Subject:** Public Comment on Behalf of the Sierra Club Bay Chapter\_Item 11c: Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)

Hello, Director Huckelbridge and Coastal Commission staff,

This is Scott Webb, Vice Chair of the Sierra Club San Francisco Bay Chapter.

We want to submit the attached letter on behalf of the Sierra Club Bay Chapter for public comment under Item 11c: Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco).

Thank you so much for your hard work.

Sincerely,

Scott Webb  
Vice Chair of the Executive Committee

Sierra Club of the San Francisco Bay Chapter



# SIERRA CLUB

## SAN FRANCISCO BAY

Serving Alameda, Contra Costa, Marin, and San Francisco counties

June 7, 2024

To: California Coastal Commission

Cc: San Francisco Public Utilities Commission, Supervisor Joel Engario, Mayor London Breed

### **Item 11c: Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)**

Dear Director Huckelbridge,

I am writing on behalf of over 27,000 Sierra Club San Francisco Bay Chapter members to express concerns with the proposed project by the San Francisco Public Utilities Commission (SFPUC). We applaud the SFPUC for its proposal to close traffic off of the part of the road that is falling into the ocean, the Great Highway Extension south of Sloat; however, in its current form, the project does not incorporate adaptive management and should be adjusted to ensure the preservation of public beach space and equitable coastal access to the coastline in defense of sea level rise.

Sierra Club policy asks local governments and regional and state agencies first to consider natural adaptation tools, such as living shorelines, and avoid the installation of hard infrastructure, such as sea walls or levees, whenever possible. Our policy also urges mechanisms that reduce coastal erosion and provide adequate sediment to sustain beaches should be identified<sup>1</sup>.

We are concerned that SFPUC's proposed three-foot thick and 3,200-foot long seawall in front of the Lake Merced sewage tunnel conflicts with our policy as it will further drive erosion of Ocean Beach and does not incorporate an adaptive management approach to sea level rise. South Ocean Beach is especially vulnerable to the coastal squeeze caused by sea level rise because erosion naturally occurs fastest at this particular stretch of Ocean Beach — the area has been described as an 'erosion hot spot' by the United States Geological Survey (USGS) erosion scientists due to wave energy and several other influences in this area<sup>2</sup>.

Projects must consider the realities of climate change. We advocate allocating resources to develop a comprehensive, long-term sea level rise adaptation plan broken out into phases. This plan should include robust triggers, monitoring, and planning commitments to relocate the Lake Merced Tunnel before 2100, ensuring the safety and sustainability of our coastal areas.

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<sup>1</sup> <https://www.sierraclub.org/sites/default/files/sce-authors/u1054/4-19.%20Adopted-SLR.pdf>

<sup>2</sup> <https://pubs.usgs.gov/publication/70148290>

With this in mind, concerns over this project must not impede or delay the closure of the Great Highway Extension. Residents of San Francisco should not be forced to choose between developing a sea wall that will trigger erosion or leaving the highway open to cars, which will also further erosion and risk damaging the Westside's sewage treatment infrastructure from the effects of sea level rise.

Sierra Club recommends the California Coastal Commission:

1. Retain the recommendation that the Great Highway Extension be closed immediately.
2. Require that the SFPUC return to the California Coastal Commission with an adjusted seawall design that utilizes adaptive rather than static management. This could be achieved by requiring the multiuse pathway to be created with moveable material, such as dirt, instead of concrete for the seawall.
3. Require that the SFPUC return with a long-term sea level rise adaptation plan with commitments to relocate the Lake Merced Tunnel before 2100.

Sincerely,

Scott Webb  
Vice Chair Executive Committee  
Sierra Club San Francisco Bay Chapter

Charles Whitfield  
Chair Executive Committee Chair  
Sierra Club San Francisco Group

**From:** [Kathy Hirzel](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** OPPOSING June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Friday, June 7, 2024 4:16:51 PM

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Commissioners:

I am writing in **OPPOSITION** to Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco) which is based on San Francisco's Ocean Beach Climate Change Adaptation Project.

San Francisco's Ocean Beach Climate Change Adaptation Project is based on San Francisco's Ocean Beach Master Plan. San Francisco's Ocean Beach Master Plan, released in 2012, does not appear to have been based on the best available science at that time as it focuses almost exclusively on wave action.

Since 2012, San Francisco's Ocean Beach Master Plan has not been updated to include emerging climate change and sea level science developed since 2012.

San Francisco's Ocean Beach Master Plan also appears to be based more on political clout than on environmentalism.

I urge the Commission to **DENY** the Application for a Coastal Development Permit.

Sincerely,  
Kathy Hirzel

**From:** [Evan Rosen](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Cc:** [er@sonic.net](mailto:er@sonic.net)  
**Subject:** OPPOSING June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Friday, June 7, 2024 4:11:48 PM

---

Commissioners:

I am writing in **OPPOSITION** to Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco) which is based on San Francisco's Ocean Beach Climate Change Adaptation Project.

San Francisco's Ocean Beach Climate Change Adaptation Project is based on San Francisco's Ocean Beach Master Plan. San Francisco's Ocean Beach Master Plan, released in 2012, does not appear to have been based on the best available science at that time as it focuses almost exclusively on wave action.

Since 2012, San Francisco's Ocean Beach Master Plan has not been updated to include emerging climate change and sea level science developed since 2012.

San Francisco's Ocean Beach Master Plan also appears to be based more on political clout than on environmentalism.

I urge the Commission to **DENY** the Application for a Coastal Development Permit.

Sincerely,  
Evan Rosen

**From:** [aeboken](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Friday, June 7, 2024 3:52:55 PM

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TO: Coastal Commission members and North Central Coast District management

FROM: Eileen Boken,  
State and Federal Legislative Liaison

Coalition for San Francisco Neighborhoods\*

\* For identification purposes only.

RE: Item 11c (Thursday June 13, 2024)  
Application No. 2-21-0912 ( SFPUC Ocean Beach Armoring, San Francisco)

Position: Strongly OPPOSING

Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco) is based on San Francisco's Ocean Beach Climate Change Adaptation Project.

San Francisco's Ocean Beach Climate Change Adaptation Project is based on San Francisco's Ocean Beach Master Plan. San Francisco's Ocean Beach Master Plan was released in 2012. San Francisco's Ocean Beach Master Plan does not appear to have been based on the best available science for that point in time as it focuses almost exclusively on wave action.

Since 2012, San Francisco's Ocean Beach Master Plan has not been updated to include emerging climate change and sea level science developed since 2012.

San Francisco's Ocean Beach Master Plan also appears to be based more on political clout than on environmentalism.

###

**From:** [Shawna J. McGrew](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Thursday, June 6, 2024 1:53:44 PM

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**I am requesting that you deny the permit Application #2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)**

The plans are 2 times the size in height/width of the original Master Plan for Ocean Beach. A new seawall I feel will result in more shoreline erosion.

With climate change it brings rising sea levels which could wipe out our very fragile coast.

There seems to be a big reduction in parking for beach goers.

The permit is not adequate for either protecting our beach or providing access to all of the Bay Area.

Lets go back to the drawing board

Thank You

Shawna McGrew  
2690-45th Ave  
San Francisco, Ca., 94116

**From:** [captainsquid56@aol.com](mailto:captainsquid56@aol.com)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Ocean Beach, Sloat blvd. ,Skyline, ,Great Highway project  
**Date:** Tuesday, June 4, 2024 5:02:02 PM

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My comments for the public hearing on June. 13th, 2024.

1) My house is right in front of the inter section at Skyline Blvd, and Sloat. When the Great Highway is closed traffic backs up a half mile or more during commute times and weekends. This creates excessive pollution from vehicles and lots of noise in our neighborhood. Also drivers do not stop for pedestrians and run the stop signs frequently.

A round about circle should be installed there that will force drivers to slow down . Over the years there have been many accidents there with several fatalities for pedestrians and drivers of cars. I am sure this can be verified in public records. When I say over the years I am talking about all the way back to the mid 1970's. When there is lighter traffic drivers speed through this area.

2) I am glad that a signaled intersection is being installed at Skyline and Great Highway, that is long over due, Thank You!!!

3) For the project between Skyline and Sloat along the Great Highway across from the sewer plant and the S.F. Zoo PLEASE put in LOTS of free parking for fishermen, surfers, and all beach goers .There use to be a few hundred parking places there in the 1970"s but over the years it all has washed away into the ocean. Again PLEASE make sure there is plenty of parking spaces included in this project. This location is very popular for Fishermen, Surfers, and Others that access the beach there.

Thank you for your time, Paul Petterson , 391 Lakeshore Dr. S.F. CA 94132

**From:** [aaron](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Sunday, June 2, 2024 10:30:34 AM

---

Dear Commissioners,

Please DENY the permit to armor Ocean Beach.

The SFPUC Ocean Beach Climate Adaptation Project is a conventional seawall. It is not what the Commission requested of SFPUC when denying that agency to build a seawall in July 2011. Back then, the Commission requested that SFPUC work with all stakeholders on a more beach friendly plan. That became the Ocean Beach Master plan recommendation: a living, ecologically functional shoreline. This project is not the Ocean Beach Master Plan.

Most of the proposed seawall would be set up right against the wave run up zone - on a shoreline that is actively eroding. Due to its shoreline blocking properties, we could see a day when the remaining beach disappears completely under water.

If approved and built, sea level rise and climate change driven storm activity will most definitely test this wall. Even with massive and regular sand replenishment as conditioned by staff, we could still witness a complete loss of this beach.

We appreciate that staff requests a condition to maximize parking at the proposed beach parking lot. Currently, applicant is proposing less than 70 spaces where there used to be 200 spaces at the project site. We urge full restoration of our former parking allotment due to the major increase in visitation at Ocean Beach.

Many people who access the beach do not live nearby. They head out to the coast with their friends and families, dogs, fishing equipment, lounge chairs and surfboards. Therefore they have to drive - which means beach parking is a necessity.

This permit is not adequate for both protecting the beach and providing access to

Bay Area residents.

Please DENY the permit. We need to send this back for major revisions.

Sincerely,

Aaron Campbell

**From:** [Mark Cordes](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Sunday, June 2, 2024 10:16:19 AM

---

Dear Commissioners,

**I write this as a resident of the Sunset Neighborhood of San Francisco and a multi-decade user and surfer of Ocean Beach! You should deny this permit!!**

The SFPUC Ocean Beach Climate Adaptation Project is a conventional seawall. It is not what the Commission requested of SFPUC when denying that agency to build a seawall in July 2011. Back then, the Commission requested that SFPUC work with all stakeholders on a more beach friendly plan. That became the Ocean Beach Master plan recommendation: a living, ecologically functional shoreline. This project is not the Ocean Beach Master Plan.

*Most of the proposed seawall would be set up right against the wave run up zone - on a shoreline that is actively eroding. Due to its shoreline blocking properties, we could see a day when the remaining beach disappears completely under water.*

If approved and built, sea level rise and climate change driven storm activity will most definitely test this wall. Even with massive and regular sand replenishment as conditioned by staff, we could still witness a complete loss of this beach.

We appreciate that staff requests a condition to maximize parking at the proposed beach parking lot. Currently, applicant is proposing less than 70 spaces where there used to be 200 spaces at the project site. We urge full restoration of our former parking allotment due to the major increase in visitation at Ocean Beach.

Many people who access the beach do not live nearby. They head out to the coast with their friends and families, dogs, fishing equipment, lounge chairs and surfboards. Therefore they have to drive - which means beach parking is a necessity.

This permit is not adequate for both protecting the beach and providing access to Bay Area residents.

Please DENY the permit. We need to send this back for major revisions.

Sincerely,

**From:** [Ashley Gray](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Sunday, June 2, 2024 9:51:28 AM

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Dear Commissioners,

Please DENY the permit to armor Ocean Beach.

this is a terrible idea for the future of OB

and you know it

**From:** [Tim Ott](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Sunday, June 2, 2024 9:04:46 AM

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Dear Commissioners,

Please DENY the permit to armor Ocean Beach.

The SFPUC Ocean Beach Climate Adaptation Project is a conventional seawall. It is not what the Commission requested of SFPUC when denying that agency to build a seawall in July 2011. Back then, the Commission requested that SFPUC work with all stakeholders on a more beach friendly plan. That became the Ocean Beach Master plan recommendation: a living, ecologically functional shoreline. This project is not the Ocean Beach Master Plan.

Most of the proposed seawall would be set up right against the wave run up zone - on a shoreline that is actively eroding. Due to its shoreline blocking properties, we could see a day when the remaining beach disappears completely under water.

If approved and built, sea level rise and climate change driven storm activity will most definitely test this wall. Even with massive and regular sand replenishment as conditioned by staff, we could still witness a complete loss of this beach.

We appreciate that staff requests a condition to maximize parking at the proposed beach parking lot. Currently, applicant is proposing less than 70 spaces where there used to be 200 spaces at the project site. We urge full restoration of our former parking allotment due to the major increase in visitation at Ocean Beach.

Many people who access the beach do not live nearby. They head out to the coast with their friends and families, dogs, fishing equipment, lounge chairs and surfboards. Therefore they have to drive - which means beach parking is a necessity.

This permit is not adequate for both protecting the beach and providing access to Bay Area residents.

Please DENY the permit. We need to send this back for major revisions.

Sincerely,

Timothy Ott

**From:** [Kathy Howard](#)  
**To:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**Subject:** Public Comment on June 2024 Agenda Item Thursday 11c - Application No. 2-21-0912 (SFPUC Ocean Beach Armoring, San Francisco)  
**Date:** Friday, May 31, 2024 6:29:44 PM

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Dear Commissioners,

Please DENY the permit to armor Ocean Beach.

The SFPUC Ocean Beach Climate Adaptation Project is a conventional seawall, more than twice the size in height and width of the original Ocean Beach Master Plan (OBMP) design. The new seawall may result in the shoreline eroding, so that the beach disappears completely. It is not a living, ecologically functional shoreline as found in the OMBP.

If approved and built, sea level rise and climate change driven storm activity will most definitely test this wall. Without massive and regular sand replenishment, we could witness a complete loss of the beach.

In addition, the SFPUC proposes very limited beach access parking – one parking lot with less than 70 spaces where there used to be 200 spaces. Many people who would access the beach do not live nearby. They have families, bring their dogs, tote in fishing equipment and surfboards; therefore they have to drive and need parking nearby.

This permit is not adequate for both protecting the beach and providing access to Bay Area residents.

Please DENY the permit.

Sincerely,

Katherine Howard  
Outer Sunset, San Francisco

**Received 433 emails with the following text:**

I support Surfrider in proposing major changes to the seawall project at Ocean Beach on this month's agenda (11c "Ocean Beach Armoring"). The San Francisco Public Utility Commission's (SFPUC) seawall project is an example of adaptation that moves in the wrong direction.

I support SFPUC's proposal to move a road that is too close to the ocean, but the proposed enormous seawall along the beach that is intended to protect the Lake Merced Tunnel will erode sand from Ocean Beach, and it will require expensive short term sand replenishment to fight beach loss. SFPUC doubles down on this armoring approach by proposing to pour concrete behind the wall to form a huge bike path. This project will dramatically limit opportunities for moving infrastructure in the future so that we can all still enjoy a sandy beach at Sloat.

We have waited for a true climate project at Ocean Beach for ten years. We won't trade our beach for concrete, and we want a greener project that can eventually be moved to ensure the future of a natural coastline. Please save South Ocean Beach, which serves the Bay Area's 7.8 million residents with recreational fishing, EPIC surf, and good times, by asking SFPUC to come back to the Commission with a project that will maintain the beach.

Sincerely,

Aaron Campbell	Alexis Crews-Holloway	Andy Olive
Abbey Austin-Wood	Alicia Adrian	Angie Petitt
Abraham Svoboda	Allison Lee	Ann Dorsey
Adam Coopersmith	Ally Alejo	Ann Kaplan
Adam West	Alp Ustun	Anna Biegalski
Aimee Williams	Alyssa Burgos	Anne Spesick
AJ Cho	Andres Chavez	Anthony Rojas
Al Romero	Andres Franklin	Asa Perryman
Alex Ferencz	Andrew Eisenstark	Asa Perryman
Alex Yenni	Andrew Pritchard	Aubree Schmidt
Alex Yenni	Andy Danforth	August Browning
Alexandra Bogdan		

Austin Nealon	Bryn Endres	Chris Packer
Austin Nealon	Caephren McKenna	Chris Young
Benedict Del Buono	Caitlin Domke	Chris Zellner
Benjamin Ersando	Cameron Powell	Christa Laib
Beth Gould	Carly Hammer	Christina Ball
Bill Hickman	Carly Rockwell	Christopher Cowdrey
Bill McLaughlin	Carmen Joseph	Christopher DeVry
Blair Jeffris	Dello Buono	Christopher
Blaise Cannon	Carol Leuenberger	Solmssen
Blake Wu	Carolyn Capitolo	Cia Court
Bob Strelo	Carolyn Dolen	Cindy Pelletier
Brandon Clark	Carson Evers	Claire Baszucki
Brandon	Cassandra Trickett	Corey Block
Kampschuur	Cassandra Vaniotis	Corinne Gentile
Brandon Macias	Cassie Hodges	Craig Rivera
	Catherine Cole	Craig Veconi
Brendan Kelley	Catherine Mullin	Dalia Burde
Brian Jacobson	Catherine Nguyen	Dalya Massachi
Brian Shah	Verge	Dana Frankoff
Brian Woods	Cathy Willis	Dante Popalisky
Brittany Costarella	Cecelia Crane	David Go
Brooke McKee	Chantal Jolagh	David Malandrino
BROOKS MILLER	Charla Murry	Debra Leow
Bruce Brewington	Chase Davenport	Dennis Markunas
Bruce Cole	Chelsea Noack	
Bryce Adams	Chloe Grady	Derek Tang

Donna Kampschuur	Gina Gatto	James Stephenson
Doug Evans	Gina Hill	Jamie Green
Douglas Schultz	Grace Shaver	Jamie Le
Drew Madsen	Graham Schmelzer	Jan Pfenninger
Dylan O'Carroll	Grant Smith	Jane Lew
Elizabeth Goldbaum	Greg Gordon	Janine Comrack
Elliot House	Greg Polchow	Jasmine Magallanes
Elliot House	Greg Shaver	Jason Kambak
Elliott Haught	Hailey Ely	Jay Chae
Emma Lutz	Hannah Levy	Jeanine Lee
Eric Denys	Hannah Lutz	Jeffrey Hurley
Eric Everson	Heather Hardison	Jeffrey Ligouri
Eric Mar	Heather Murdock	Jen Benitez
Eugenia Ermacora	Helen Vander Wende	Jen Schnell
Everett A. Vieira III	Hsiao-in Wang	Jennifer Abernathy
Faye Pineda	Ian Long	Jennifer Bruursema
Frances England	Isabella Ahrens	Jennifer Gann
Frances Hill	J. Barry Gurdin	Jennifer Hayes
Frank Perkins	Jack Rollens	Jessica Heiden
Frederick Jacobs	James Bultitude	Jessica Schorer
Gabriel Lautaro	James Feichtl	Jim Sciuto
Garrett Spiegel	James Jaffee	JL Angell
George Kliengklom	James Matheson	Jo Ann Carter
George Ruiz	James Royer	Joan Smith
Geraldne Masson	James Royer	Joe Lee

Joelle Nelson-Achirica	K Wade	Kimba Theurich
John Bruner	Kali Perry	Kimberly Leshar
John Cloonan	Karen Berman	Kristin Brinner
John Connor	Karen Jacques	Kurt Loeffler
John Moreau	Karen Kirschling	Kyralai Duppel
John Rizzi	Karen Paul	Lara McDonald
John Schultze	Kate Blumberg	Laura Mani
Jon Mantle	Kate Foss	Laurie Vann
Jonathan Elkus	Kate Mercado	Lena Corwin
Jonathan Weinstock	Katharine Kirby	Lindsay Ahrens
Jordan Joseffer	Katherine S	Lisa Franzia
Judy Hartmann	Kathryn Gritt	Lisa Goodpaster
Julia Fuller	Kathryn Nassar	Lisa Peasley
Julia Murray	Kathy Fujimoto	Lisa Socolow
Julia Restivo	Katy Macek	Ionna Richmond
Julian Stampalia	Kaylee Savage-Wright	Louis Desroches
Julianna Marciel	Kellen McKillop	Louisa Cryan
Julie Griffin	Ken Knox	Lucas Lepinard
Julie Kelleher	Kenny Lam	Lynette Ridder
Julie Stein	Kenny Pechous	Mackenzie Robinson
Juliet Pearson	Kenny Pechous	Madeline Journey-Lynn
June Chen	Kermit Cuff	Makenna Mitchell
Justin Bugay	Kevin Branstetter	Margaret Fowler
Justin James	Kevin Roach	Margot May
Justin Murray	Kevin Van Gundy	Mari Eliza

Marialena Varympopioti	Michael Filice	Nicole Poinsatte
Marie Martin	Michael Filice	Nina Atkind
Marisa Torres	Michael Grady	Noah Johnson
Mark Fernandez	Michael Johnson	Noah Vauclair
Mark Higgins	Michael Kavanaugh	Nona Weiner
Mark Koop	Michele Carlsen	Octave Lepinard
Mark Pugh	Michelle Allison	Oliver Henrikson
Mark Siegel	Michelle Pappe	paige medina
Martha Andrews	Mike Cass	Pam Singer
Martijn Lancee	Mike Grizzle	Patrice Wallace
Mary Kate Duggan	Mike Monson	Patrick Grady
Mary Wilson	Mike Trivich	Patti McMahon
Matt Danon	Molly Niffenegger	Paul Jenkin
Matt Huntington	Ms Lilith	Paul Ruegg
Matt Negrete	Nancy Hinze	Peter Liang
Matt Tyler	Nathan Pierce	Phil Uma
Matthew Burrows	Ned Webster	Philip Fleury
Matthew Hill	Newara Brosnan-Faltas	Pieter Nelissen
Matthew Knudsen	Nicholas Ferrif	Rachel Budenholzer
Maura Sweetland	Nick Mulford	Rachel Strader Chen
Maureen Tunney	Nick Waters	Rachel Wolf
Melissa Bolandi	Nick Waters	RANDALL LEONARD
Melissa M Peraza	Nico Renard Williams	Rashid Patch
Michael Burch	Nicole Kelsey	Raziya Wang
Michael Duskus		Raziya Wang

Rebecca Winsor	Scott Love	Susan Stanger
Ren Vespremi	Scott Miller	Suzanne Bohnel Buch
Renee Crouzet- Pascal	Scott Shoemaker	Sydney Harris
Reva Swiedler	scott tye	Sylvia Cardella
Rich Lopez	Sean Gibson	Tammy Lew
Richard Goozh	Sean Yonts	Ted Ferris
Rita Nolan	Sean Yonts	Ted Hatch
Robert Barney	Seth Wyland	Thea Forrester
Ronald Bogin	Shari Wilk	Thiago Malena
Russell Smith	Shea Grady	Thomas Proett
Ryan Hunt	Shelly Ericksen	Tiffany Hutter
Ryan Kelley	Sita Khufu	Tiffany Konyen
Ryan McNabb	Sofia Magana	Tiffany Neumann
Sabine Angulo	Sonja Declercq	Tiffany Yonts
Sally Breul	Sophie Frank	Tim Maloney
Sam Crookston Herschlag	Spencer ziebarth	Tim Tichenor
Samuel Dimond	Spenser Trost	Todd Wiley
Samuel Durkin	Stahsha Lach	Tom Leko
Sandy Commons	Stefan Jeremias	Tomasita Medál
Sara Williams	Stephanie Milius	Tony Pastore
Sarah Castelblanco	Stephen Rice	Tracy Rogers
Sarah Griffin	Steve Horeff	Trevor Hirsch
Sasha Lovell	Steve Medina	Tyler Risom
Scott Benson	Steve Shephard	Udo Wahn
	Susan Grady	Utkarsh Nath

Van Kambak

Vicki Conlon

Victo Reyes

Wayne Fergerstrom

Wesley Garfield

Wiebke Thrasher

Will Cheng

Will Giar

Will Giar

William Greenlee

Yasmine El-Hage

Yubey Delgado