

CALIFORNIA COASTAL COMMISSION

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W6d

Final Draft 2026-2030 California Coastal Commission Strategic Plan

December 8, 2025

CORRESPONDENCE

Additional correspondence received in the time since the staff report was distributed on
November 26, 2025



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November 13, 2025

Dr. Kate Huckelbridge
Executive Director, California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105-2421

RE: Draft 2026-2030 Coastal Commission Strategic Plan

Dear Executive Director Huckelbridge:

The Nature Conservancy (TNC) writes to provide comments on the California Coastal Commission's (Commission) Draft Strategic Plan for 2026-2030.

TNC is a science-based organization that works worldwide to deliver conservation solutions that benefit both people and nature. Our mission is to conserve the lands and waters upon which all life depends, and TNC has applied deep technical expertise, tools, and resources in conservation science expressly to conserve biodiversity and increase climate resilience. In California, we have protected over 1.5 million acres of landscapes, preserving habitats that are essential to nature and people. TNC has also worked closely with scientists, managers, and other partners to develop transformative solutions to improve management of ocean habitats and fisheries along California's coast.

California's coast and ocean are not only iconic, but they are also critical to the health and wellbeing of Californians. The diverse habitats found in and along the state's waters provide myriad benefits including supporting rich biodiversity and lucrative fisheries, mitigating climate change, supporting jobs and local economies, supplying food, and offering recreational opportunities. However, factors including habitat degradation and destruction, and pollution, which are exacerbated by climate change, are threatening the health of California's coast and ocean.

TNC and the Coastal Commission share a commitment to protect California's coastal resources and support resilient communities. We commend the Coastal Commission for its decades of work leading California's efforts to safeguard our coast and to ensure our iconic beaches and coastline benefit all Californians, both current and future generations. TNC appreciates the Commission's efforts to recover wetlands, conserve vital habitat, and provide equitable and affordable public access and recreation. These efforts help further California's progress toward achieving the State's ambitious biodiversity, climate, and outdoor access goals, including the trailblazing 30x30 initiative to conserve 30 percent of California's lands and coastal waters by 2030.

The 2026-2030 California Coastal Commission Strategic Plan will guide the Commission's work in the coming years. As the Commission continues to craft the 2026-2030 Strategic Plan, TNC offers the comments and recommendations below for consideration, with detailed recommendations on the goals, objectives, and actions related to protecting and restoring coastal habitats, leveraging nature-based solutions, advancing resilient communities, and addressing water quality.

TNC Comments and Recommendations on the Commission's 2026-2030 Strategic Plan:

- **Incorporate diverse coastal habitats, such as islands and wetlands, wherever possible.** California's coastline includes a variety of habitat types that are key features of healthy coastal and marine ecosystems. Some of these critical coastal habitats, such as islands and wetlands, are facing growing pressures from climate change impacts. While the draft Strategic Plan recognizes the importance of coastal wetlands and other habitats and includes specific objectives and actions focused on these habitats, there are additional Goals, Objectives, and Actions that can be expanded to more explicitly include diverse habitat types (**e.g., Goal 1, Objective 1; and Goal 2, Objective 3, Action 2.3.6**). Importantly, the draft strategic plan does not include any reference to island ecosystems. TNC recommends that, wherever possible, the Commission incorporate islands, wetlands, and other diverse coastal habitat types.
- **Expand efforts to develop and implement strategies to protect against climate change and sea level rise impacts to include all coastal habitats.** TNC appreciates the Commission's emphasis on protecting beaches and other public trust resources from the impacts of climate change and sea level rise, which will ensure our coastline remains resilient and accessible for future generations (**Goal 1, Objective 1**). While the Strategic Plan focuses on addressing sea level rise and climate change impacts to California's most vulnerable beaches, science shows that more than 60 percent of all coastal habitats will be impacted. TNC recommends the Commission expand these efforts to encompass all coastal habitats. Sea level rise is also expected to reduce coastal access, with disproportionate impacts on access for disadvantaged communities. By more holistically addressing sea level rise impacts, the Commission will also support its efforts to provide equitable and affordable coastal access (**Goal 1, Objective 2**).
- **Incorporate water quality metrics in coastal resources protection and promote collaboration on integrated watershed management and water quality.** Coastal water quality issues can have significant impacts on the health of aquatic life, ecosystems, and humans. To address this growing challenge, TNC recommends that the Commission incorporate water quality metrics into **Goal 2, Objective 2**. We also recommend that the Commission strengthen collaborative efforts with the State Water Resources Control Board, the Regional Water Quality Control Boards, and local wastewater utilities to address water quality issues through joint planning, data sharing, and integrated watershed management approaches.

- **Integrate coastal habitats and wastewater infrastructure vulnerabilities into climate adaptation planning efforts and encourage collaborative transportation adaptation projects.** TNC appreciates the Commission's acknowledgement of the importance of integrating land use, public access, housing, and transportation planning into climate adaptation efforts (**Goal 2, Objective 3**). **Goal 2, Objective 3** focuses primarily on climate-resilient housing and transportation. However, the built environment, particularly transportation infrastructure, is one of the most significant impacts to the ability of coastal habitat to adapt to rising seas. Additionally, aging or poorly located wastewater treatment systems pose significant risks to coastal water quality and public health. To address these challenges, TNC recommends that the Commission explicitly add coastal habitats and wastewater infrastructure vulnerabilities to the list of considerations to integrate into climate adaptation efforts. Furthermore, TNC recommends adding an action under **Goal 2, Objective 3** to encourage collaborative transportation adaptation projects that integrate ecosystem, community, and economic goals early in transportation planning efforts.
- **Incorporate nature-based solutions into sea level rise adaptation efforts.** Nature-based solutions can cost-effectively protect communities and infrastructure from the impacts of climate change while providing a variety of additional benefits such as biodiversity conservation, habitat protection, and carbon sequestration. Nature-based solutions can also be deployed to treat runoff and effluent. As such, TNC recommends updating **Action 2.3.4** to include nature-based solutions: "Explore innovative, multi-benefit, and nature-based solutions for sea level rise adaptation for new and existing infrastructure."
- **Support continued efforts to accelerate permitting for restoration projects and encourage collaboration across federal, state, regional, and local agencies and implementers.** TNC appreciates the Commission's dedication to protecting coastal resources and restoring coastal wetlands and habitats. The State's efforts to streamline and expedite permitting for restoration projects through efforts such as the Cutting Green Tape Initiative have helped increase the pace and scale of restoration efforts in California. TNC strongly supports the Commission's ongoing emphasis on continuing to accelerate review of projects that protect and restore California's coastal ecosystems (**Goal 4, Objective 1, Actions 4.1.1 and 4.1.5**). TNC encourages the Commission to continue to collaborate closely with agency partners at the federal, state, regional, and local levels on permitting for restoration projects, and we recommend that the Commission expand early collaboration opportunities with local and regional project implementers and other regulatory agencies.
- **Accelerate efforts to advance resilient communities, including climate-resilient housing and infrastructure.** TNC appreciates the Commission's efforts to advance smart growth strategies that reduce greenhouse gas emissions, protect coastal resources, and support resilient, equitable development (**Goal 2, Objective 3**) through integrated planning and multi-benefit projects. We are pleased to see the important actions (**Actions 2.3.1-2.3.6**) outlined in the draft Strategic Plan and

support these efforts, particularly **Action 2.3.3**. Wherever possible, TNC encourages the Commission to leverage nature-based solutions in its efforts to achieve these goals.

- **Leverage coastal habitat restoration to support resilient coastal agriculture.** As noted in the draft Strategic Plan, coastal agriculture and open space are vital coastal resources that are under threat due to the impacts of climate change, among other pressures (**Goal 4, Objective 3**). Restoration of coastal habitat on lands impacted by climate change and sea level rise can provide resilience benefits to and retain economically viable coastal agriculture. TNC recommends that the Commission consider adding coastal habitat restoration to **Goal 4, Objective 3, Action 4.3.1**: “Explore and expand agricultural land protection approaches and mechanisms, *including restoration of coastal habitat on impacted lands that provide benefits to coastal agriculture.*” Additionally, the coastal assessment that TNC and the State Coastal Conservancy produced, [“Conserving California’s Coastal Habitats: A Legacy and a Future with Sea Level Rise,”](#) could support the Commission’s evaluation of coastal agricultural land vulnerability to sea level rise (**Goal 4, Objective 3, Action 4.3.2**).

Thank you for the opportunity to provide comments and recommendations. We look forward to working with you to support the Commission’s critical work to protect and restore our coastal ecosystems, preserve biodiversity and other coastal resources, enhance community and coastal resilience, and ensure access to our iconic coast for all.

Sincerely,

A handwritten signature in black ink, reading "Liz Forsburg Pardi". The signature is written in a cursive, flowing style.

Liz Forsburg Pardi, Ph.D
Director of External Affairs & Policy
The Nature Conservancy

CALIFORNIA COASTAL COMMISSION

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W6d

Final Draft 2026-2030 California Coastal Commission Strategic Plan

November 26, 2025

CORRESPONDENCE

From: [Vu, Karen@Coastal](mailto:Vu,Karen@Coastal)
To: [Coastal Strategic Plan Comments](#)
Subject: RE: Comments on the California Coastal Commission's Draft 2026–2030 Strategic Plan and Coastal Zone Enhancement Program Assessment and Strategy
Date: Wednesday, November 26, 2025 9:09:53 AM

From: Brenda L. Tomaras <btomaras@mtowlaw.com>
Sent: Tuesday, October 14, 2025 11:15 AM
To: Hall, Megan@Coastal <megan.hall@coastal.ca.gov>
Subject: Comments on the California Coastal Commission's Draft 2026–2030 Strategic Plan and Coastal Zone Enhancement Program Assessment and Strategy

You don't often get email from btomaras@mtowlaw.com. [Learn why this is important](#)

Dear Ms. Hall,

On behalf of the Lytton Rancheria, thank you for the opportunity to review and comment on the *Draft 2026–2030 California Coastal Commission Strategic Plan* and related *Coastal Zone Enhancement Program Assessment and Strategy*. The Tribe appreciates the outreach reflected in your letter dated September 18, 2025, and recognizes the Commission's intent to include Tribal voices early in the development of these planning documents. The Coastal Act and the Commission's work have long shaped the health and accessibility of California's shoreline. It is fitting that, as the agency marks the 50th anniversary of this landmark law, it seeks to ensure that future coastal policies reflect the diversity of the people who have always depended on and cared for the coast.

The Tribe recognizes and values the Commission's continuing commitment to environmental justice and inclusion, and acknowledges the improvements in the current draft—particularly the expanded references to Tribal partnerships, co-management, and cultural stewardship. At the same time, the draft Strategic Plan would benefit from stronger language that affirms the sovereign-to-sovereign relationship between California Native American Tribes and the State, as well as clearer procedures for government-to-government consultation under the Commission's 2018 *Tribal Consultation Policy*. Consultation with Tribes must be early, substantive, and continuous, encompassing more than just information sharing or public participation. The final plan should explicitly commit to that standard and track and report on consultation activities in the same manner as other performance goals are monitored.

The Tribe also encourages the Commission to recognize that California's coast is not only an environmental and recreational resource, but also a living cultural landscape containing ancestral villages, burial sites, ceremonial places, and gathering areas for traditional foods, plants, and materials. For Tribal communities, access to the coast is not identical to public recreation. It includes cultural and subsistence uses that are deeply tied to identity, ceremony, and intergenerational knowledge. These uses may involve visiting locations that are not appropriate for broad public access and may require the protection of sensitive cultural resources from disturbance. The Tribe recommends that the final Strategic Plan distinguish between general public access and Tribal cultural access, and that it affirms the Commission's responsibility to safeguard both. When developing new coastal trails, beach facilities, or public accessways, consultation with affected Tribes should occur at the earliest stage to determine whether proposed routes intersect with sacred or cultural sites, and to identify ways to accommodate Tribal access for gathering, fishing, or ceremony in culturally appropriate and respectful ways.

The Commission's goal of "ensuring coastal access for all" would thus be strengthened by language acknowledging that "for all" includes Tribes whose relationship to the coast predates statehood. This includes the right to continue customary use of coastal areas for gathering and subsistence activities, as well as the recognition that cultural privacy and protection may sometimes require managed or restricted public access in specific locations. The Tribe urges the Commission to include co-management and cooperative stewardship provisions that enable Tribes to oversee these areas in collaboration with state and local agencies. In this way, expanded access can coexist with the protection of cultural landscapes, rather than unintentionally placing them at risk.

The Tribe supports the proposal to establish a permanent Tribal Liaison position within the Commission and recommends that this role be developed into a complete Tribal Affairs Program with appropriate staffing and funding. Such a program could coordinate consultation across all divisions, assist local governments and applicants in understanding cultural resource obligations, and facilitate Tribal participation in Local Coastal Program updates and grant programs. Including Tribes as eligible partners under the Commission's Local Coastal Program (LCP) and WHALE TAIL® grant programs would provide significant capacity to engage in restoration, education, and stewardship projects along the coast.

In the area of planning and climate resilience, the Tribe welcomes the Commission's recognition that local governments will be required under Senate Bill 272 to integrate sea level rise into their Local Coastal Programs. Because many of those planning areas include traditional territories or cultural sites, Tribes must be included as partners in that process. The Commission's Local Government Working Group should incorporate Tribal governments directly and provide opportunities for Tribal participation in the development of new LCP guidance and climate adaptation strategies. Integrating Traditional Ecological Knowledge into habitat restoration, sediment management, and sea level rise planning would not only honor Tribal stewardship but would improve ecological outcomes and community resilience.

Throughout implementation of the Strategic Plan, the Commission should continue to reaffirm that consultation with Tribes is government-to-government and that Tribes are not stakeholders but sovereigns with rights and responsibilities distinct from those of the general public. This principle should guide the development of new policies and be visible in the Plan's introduction and in every section addressing partnerships, access, or resource protection. The Commission should also establish measurable indicators for consultation and engagement—such as the number of formal consultations conducted each year, the number of training sessions completed by staff and Commissioners, and examples of how Tribal input influenced Commission decisions. Including these metrics in the annual *Year in Review* would bring the same transparency to Tribal relations that the agency applies to other program goals.

Finally, the Tribe recommends that the Strategic Plan explicitly reference the statutory and regulatory frameworks that support and guide consultation, including Executive Order B-10-11, Public Resources Code §§21080.3.1–3.2, and the Coastal Zone Management Act §309 Enhancement Program. Doing so would ensure that the Commission's commitments align with existing federal and state mandates, thereby strengthening eligibility for federal enhancement funding related to cultural resource protection.

The Tribe appreciates the Coastal Commission's willingness to listen and to refine its Strategic Plan in collaboration with California Native American Tribes. The *Draft 2026–2030 Strategic Plan* demonstrates meaningful progress toward a more inclusive and equitable approach to coastal protection. By incorporating explicit commitments to government-to-government consultation, recognizing the unique nature of Tribal coastal access, and establishing

mechanisms for co-stewardship and accountability, the Commission can ensure that the next fifty years of coastal protection reflect both the enduring vision of the Coastal Act and the deep, continuous relationship of California's First Peoples to the ocean and shore.

We respectfully request that these recommendations be included in the final Strategic Plan and that the Commission continue direct consultation with the Tribe as the documents move toward adoption and implementation. Thank you again for your outreach and for your continued efforts to ensure that Tribal voices remain central in shaping the future of California's coast.

Brenda L. Tomaras
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Seadrift Association
Stinson Beach

November 10, 2025

Dear Honorable Members of the California Coastal Commission:

I am making this submission on behalf of the Seadrift Association regarding the Draft California Coastal Commission ("CCC") Strategic Plan 2026-2030 (the "Plan"). I am a full-time resident of Marin County as well as a homeowner in the Seadrift community.

While there are many laudable goals outlined in the Plan, there is language that is concerning to the Seadrift Association and its 300 homeowners that we believe should be modified.

GOAL 2, OBJECTIVE 1: Ensure LCPs Address Sea Level Rise and Climate Change

With respect to the objective, "The Commission supports local governments in balancing development that fosters vibrant, inclusive communities with the Coastal Act's mandate to protect coastal resources and prioritize public access, recreation, and environmental stewardship," our experience with the CCC's input into the Marin County LCP Environmental Hazards 2024-25 amendment process was fraught. At the time, the Seadrift Association and many of its members (with little advance notice) went on record in opposition to the CCC's proposed changes to the LCP.

In the CCC Plan, we have similar concerns about references to the removal of physical barriers and the reduction of inequitable barriers to coastal access which could be interpreted as sanctioning the removal of existing homes and structures. References to limiting shoreline armoring could potentially conflict with or require waiver of rights under the Coastal Act and would potentially conflict with the terms of the settlement agreement reached between Seadrift Association and the CCC, the County of Marin, the State Lands Commission, and other government entities after lengthy litigation.

The reference to develop LCP and CDP guidance to help local government implement equitable access programs and meet Coastal Act requirements raises issues the Seadrift Association previously noted, including allowing that development can be removed or relocated for sea level rise adaption planning even though an LCP amendment cannot require the removal of structures that were legal when built, even in the name of adaptation planning, without constituting a significant Taking of private property.



Seadrift Association
Stinson Beach

GOAL 2, OBJECTIVE 3: Advancing Climate-Resilient Housing and Transportation Planning

The blanket statement ". . . prioritizing managed retreat where feasible . . ." implies that managed retreat is preferred over the maintenance and protection of currently built property and infrastructure. This statement does not do justice to the many innovative solutions being developed for sea level rise adaptation and shoreline protection that can allow communities to protect currently built property. In terms of private property ownership, managed retreat should be considered a last resort option rather than an intervention applied "where feasible" and more moderate language should be used to communicate a balanced approach.

In general, Goal 2 should uphold actions supportive of a homeowner's right to protect and adapt currently built property without attaching onerous provisions.

CONCLUSION

The Seadrift Association understands the importance of safeguarding coastal resources, and it and its members have been longstanding stewards protecting the lands, marine areas and avian life. We want to work collaboratively with the CCC to ensure the future vibrance of the coastal community without putting our own interests at risk. Thank you.

Very truly yours,

A handwritten signature in blue ink that reads "m. dyer grote".

Dyer Grote
President, Seadrift Association

From: aeboken
To: [Coastal Strategic Plan Comments](#); [Rexing, Stephanie@Coastal](mailto:Rexing.Stephanie@Coastal); [Henningesen, Luke@Coastal](mailto:Henningesen.Luke@Coastal)
Subject: Written Submission for 2026 - 2030 Coastal Commission Draft Strategic Plan
Date: Monday, November 10, 2025 1:35:43 PM

You don't often get email from aeboken@gmail.com. [Learn why this is important](#)

November 10, 2025

TO: California Coastal Commission
cc: North Central Coast District manager and staff

FR: Eileen Boken,
State and Federal Legislative Liaison

Coalition for San Francisco Neighborhoods*

*For identification purposes only.

RE: Written Submission for 2026 - 2030 Coastal Commission Draft Strategic Plan

Goal 2 Plan For Resilient Communities
Objective 3 Advance Climate Resilient Housing and Transportation Planning

- Re-emphasize preservation of affordable housing in the Coastal Zone as stated in California State Public Resources Code 30604 (g) as well as increasing affordable housing in the Coastal Zone.
- Development pressures in San Francisco's Coastal Zone could change Ocean Beach into Miami Beach.
- Protecting and prioritizing public safety must be included as a goal in the Coastal Zone.

Goal 4 Protect Coastal Resources
Objective 2 Protect Marine Resources
Action 4.2.1 Expand staff knowledge and expertise on emerging and expanded uses of the marine environment.

- Offshore desalination projects should be included as priorities along with proposed offshore wind projects.

Goal 4 Protect Coastal Resources
Objective 2 Protect Marine Resources

- As proposed in other written submissions, the waters off San Francisco's Ocean Beach should be a provisional Marine Protected Area (MPA) in California as it awaits the NOAA review of the Greater Farallones National Marine Sanctuary (GFNMS) Management Plan

Review.

- The Management Plan Review proposes to include the waters off San Francisco's Ocean Beach as a non-contiguous area in the GFNMS.

###

Sent from my Verizon, Samsung Galaxy smartphone

From: [Gray, Shana@Coastal](mailto:Gray.Shana@Coastal)
To: [Coastal Strategic Plan Comments](#)
Subject: FW: Public Comment on October 2025 Agenda Item Wednesday 6d - California Coastal Commission Draft 2026-2030 Strategic Plan
Date: Wednesday, October 8, 2025 11:56:54 AM

From: Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>
Sent: Wednesday, October 8, 2025 11:56 AM
To: Gray, Shana@Coastal <Shana.Gray@coastal.ca.gov>; Vu, Karen@Coastal <karen.vu@coastal.ca.gov>
Subject: Fw: Public Comment on October 2025 Agenda Item Wednesday 6d - California Coastal Commission Draft 2026-2030 Strategic Plan

From: Peter <peter_mcnamee@hotmail.com>
Sent: Wednesday, October 8, 2025 11:41 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Comment on October 2025 Agenda Item Wednesday 6d - California Coastal Commission Draft 2026-2030 Strategic Plan

You don't often get email from peter_mcnamee@hotmail.com. [Learn why this is important](#)

Enactment of the California Coastal Zone Conservation Act represented a seminal turning point in our State's history

Voters empowered this Commission to conserve and protect California's coastal zone as a vital environmental resource.

Your Strategic Plan is an important articulation of the Commission's goals, objectives and commitment towards fulfilling its mandate from California's voters.

I applaud the Commission and its staff for outlining a smart strategic

course to actualizing that mandate.

In the past half century, as the implications of Climate Change have manifest, you have adapted your strategic actions accordingly.

This draft strategic plan is the latest iteration of that adaptive evolution. As such, it is important the Commission's strategy continue evolving to address new emerging challenges Climate Change confronts us with.

One of the most significant such challenges is the rising number of people forced to migrate from communities becoming less and less habitable due to droughts, excessive prolonged heat, wild fire destruction, storm disasters and sea level rise.

The impacts of this migration are felt both by the communities these migrants leave, as well as communities they migrate to.

Climatologists anticipate globally, that for every degree of climate warming a billion people will migrate from adversely impacted areas to safer climate havens better suited for sustainable habitability.

Because the vast bulk of Californians live in communities abutting the coastal zone, this migration will have a huge impact on coastal development, use and conservation.

Demographers have already begun to study and report on how

communities are coping with what is becoming the biggest mass migration of people in our State's history.

Initial impact assessments show declining population growth in southern portions of California and expanded population growth in more rural temperate northern areas of the State.

In some areas on the North Coast, the influx of climate migrants has disproportionately exacerbated a lack of affordable housing and commercial space, putting increasing pressure on communities to build in coastal zone areas.

I urge the Commission to recognize the growing challenge of Climate migration, and to incorporate effective specific goals, objectives and actions into this strategic plan to address this new and evolving challenge to conserving and protecting our coast as a natural resource and asset for all Californians.

Peter McNamee

Fort Bragg, California

Sent from my iPad

SANDAG Comments on the Draft 2026-2030 Coastal Commission Strategic Plan			
Page Number	Chapter/Appendix/ Section	Heading	Comment
5	Goal 1	Objective 1 (Intro paragraph)	We agree armoring the shoreline should be avoided whenever possible, but there are unique circumstances where armoring must occur in order to protect critical infrastructure and for public safety purposes. In these cases, more near-term solutions must be implemented as the long-term (nature based) alternatives are developed. It is also helpful to have clear mitigation guidance (in-lieu fee formulas, etc.) identified for these unique cases.
5	Goal 1	Objective 1 (1.1.1)	We fully support the objective to provide more multi-modal access to the coast. This aligns with SANDAG's goals and we would be interested in partnering on this topic. For example, it would be beneficial if we were able to revisit past projects such as the Beach Bug, which was a NEV microtransit shuttle in the Pacific Beach community.
5	Goal 1	Objective 1 (1.1.4)	We agree it is helpful to have guidance for accepting new coastal accessways. SANDAG typically constructs projects and turns them over to landowners/operators, and developing the framework for this handoff phase early on would be very beneficial. However, we recognize challenges associated with this, including maintenance challenges associated with limited funding and legal constraints.
5	Goal 1	Objective 2 (1.2.1)	We support expanding the California Coastal Trail (CCT) Network, but we recommend planned infrastructure projects be considered during the planning phase of these CCT expansion projects to avoid potential conflicts with other planned or ongoing projects.

6	Goal 1	Objective 3 (1.3.2)	We agree that it is important to coordinate with Native American tribes on coastal projects and recommend emphasizing the importance of engaging tribes early in the planning process. SANDAG facilitates the Interagency Technical Working Group on Tribal Transportation Issues (Tribal TWG), which connects leaders of each San Diego tribe with local, state, and federal agency partners on a quarterly basis. The purpose of these discussions is to ensure our regional planning efforts align with tribal needs and priorities. The Tribal TWG serves as an example platform where early and ongoing updates on coastal projects can be shared as they are developed.
10	Goal 3	Objective 1 (3.1.3)	SANDAG's public engagement team has been increasingly using methods such as email-blasts and frequent website updates to reach more people. We support the proposed use of digital platforms for outreach based on our experience.
10	Goal 3	Objective 2 (3.2.1)	We fully support an online portal system to process applications through. This would streamline the process.
12	Goal 4	Objective 1 (4.1.5)	SANDAG appreciates CCC's partnership on processing permits for advanced mitigation projects as part of our Environmental Mitigation Program. CCC's participation in the PWP/TREP's Resource Enhancement and Mitigation Program (REMP) has been extremely helpful in streamlining mitigation projects, and we recommend using this as a framework for future efforts.



The Honorable Dr. Kate Huckelbridge, Executive Director
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105-2421

November 10, 2025

Re: California Coastal Commission (CCC) 2026-2030 Strategic Plan

Dear Commissioners,

We write on behalf of the [Surf Justice Collective](#) (SJC), a statewide coalition of community-based surf and ocean justice organizations advancing equitable coastal access and belonging. Our work centers communities that have been, and continue to be, systemically excluded from California's coastline.

We appreciate the opportunity to comment on the California Coastal Commission's Draft 2026–2030 Strategic Plan and the Commission's ongoing leadership in implementing the Coastal Act's vision of a coast that is open and accessible to all. We commend the Commission for centering equitable coastal access, environmental stewardship, and organizational resilience as guiding principles for the next five years. The plan reflects the enduring intent of the Coastal Act and recognizes that California's coast must remain open, inclusive, and protected for future generations, both through physical access and through the removal of systemic barriers that limit who feels welcome.

As a collective of advocates, educators, and community partners advancing equity in ocean access and surf culture, we strongly support the Commission's commitment to "coastal access for all". We applaud the emphasis on expanding lower-cost recreation and overnight accommodations, strengthening partnerships with Tribes, and investing in a resilient, adaptive coast in the face of climate change.

We offer the following recommendations to reinforce and build upon the priorities already identified in the draft plan and to help ensure they result in meaningful, community-level outcomes:

1. Deepen commitments to equitable coastal access and accountability – We encourage the Commission to prioritize sustained partnerships with community-based organizations that address non-physical and systemic barriers to participation, particularly for youth, low-income families, and inland communities. While continued investment in physical access infrastructure is critical, the success of equitable access depends equally on programming, transportation, and cultural inclusion that make coastal spaces genuinely welcoming for all Californians.
2. Recognize and invest in youth and community programs as critical access pathways – Youth and community programs are essential for building lifelong connections to the coast, cultivating environmental stewardship, and creating equitable access to surfing, outdoor recreation, and coastal careers pathways. We encourage the Commission to explicitly recognize these programs as essential social infrastructure for achieving Goal 1: Ensuring Coastal Access for All, and to deepen investments in partnerships that cultivate the next generation of coastal leaders and advocates.

Additionally, we are deeply supportive of the Commission's work to expand, sustain, and institutionalize funding for justice-centered access programs. Programs such as the Whale Tail Grants have transformed opportunities for underrepresented communities to connect with the ocean and develop stewardship pathways. We urge the Commission to prioritize identifying and securing long-term, stable funding to expand these programs and reach new community partners. The plan's success will depend on ensuring that organizations rooted in community relationships can continue to deliver equitable, hands-on experiences that advance the Coastal Act's vision.

3. Strengthen enforcement of community access rights- The Coastal Act provides a clear statewide access standard, yet equity-focused community programs like ours continue to face various local and state permitting obstacles in running education, recreation, stewardship and culture-focused activities from beach cleanups to surfing. These obstacles limit access and deplete organizations' limited resources. They ultimately result in fewer opportunities for Californians to experience the coast. We recommend that the Commission consider adding an additional strategic plan action to prioritize enforcement of activity permitting processes of coastal managers- including State Parks- that have not been approved by the Commission in a CDP or LCP and that limit community access. We recommend that any subsequent enforcement orders and settlement agreements are in turn directed to support community access programs.

The Surf Justice Collective shares your commitment to a vibrant, resilient, and just coast; one where every person, regardless of background, geography, or income, can experience the joy, power, and healing of the ocean.

Thank you for your leadership and for the opportunity to contribute to this important plan. We look forward to continued collaboration with the Commission to ensure its goals translate into tangible, equitable outcomes for all Californians.

Sincerely,

Adriana Guerrero-Nardone
Executive Director
Salted Roots

Ben McCue
Executive Director
Outdoor Outreach

nic brisebois
Co-Director
Queer Surf

Kayiita Johansson
Founder
Black.Surfers



November 10, 2025

SENT VIA EMAIL

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Via email: StrategicPlanComments@coastal.ca.gov

SUBJECT: Port of San Diego Comments on the Draft 2026-2030 Strategic Plan

The Port of San Diego (Port) appreciates the opportunity to comment on the California Coastal Commission's (Commission) Draft 2026-2030 Strategic Plan (Draft Strategic Plan) dated September 2025. The Port is a regional, public benefit agency created in 1962, through the California State Legislature's adoption of the San Diego Unified Port District Act (Port Act). Through the Port Act, the Port was granted the state tidelands and submerged lands around San Diego Bay and entrusted to manage the diverse waterfront uses on these lands in a manner that is consistent with the Public Trust Doctrine, promoting and balancing navigation, commerce, fisheries, recreation, and environmental stewardship. The Port's jurisdiction (Port Tidelands) exists primarily within the California Coastal Zone, thus Chapter 8 and in, certain circumstances, Chapter 3 of the California Coastal Act (Coastal Act) also apply to the state tidelands and submerged lands that the Port manages.

Pursuant to Chapter 8 of the Coastal Act and requirements established in the Port Act, the Port prepared and adopted a Port Master Plan, which was certified by the Commission in 1981. Since certification, the Port Master Plan has been amended roughly forty times, and in 2013, the Port began the process to comprehensively update the Port Master Plan to provide more flexibility and certainty to potentially reduce the number of amendments in the future. The Port Master Plan Update (PMPU) process has involved extensive public outreach and stakeholder engagement, including ongoing coordination with Commission staff from the local San Diego office. On February 28, 2024, the Board of Port Commissioners (Board) unanimously certified the Final Program Environmental Impact Report (PEIR) and approved the Final Draft PMPU, and directed the filing of the PMPU with Commission staff for certification. In addition to the PMPU, Port staff has worked closely with Commission staff on multiple Coastal Development Permits (CDPs); Port Master Plan Amendments (PMPAs), and other coastal projects on Port Tidelands; and we envision continued coordination and collaboration into the future as we pursue certification of the PMPU, and numerous other projects such as the National City Balanced Plan, Chula Vista Bayfront Master



Plan, and the inclusion of the submerged lands in San Diego Bay into our coastal permitting authority, also known as the Trust Lands Use Plan, which were granted to the Port through California Senate Bill 507 in 2020.

As a steward of San Diego Bay, the Port's mission and strategic goals include protection and improvement of San Diego Bay's environmental resources and coastal public access. This is similar to the Commission's mission to protect and enhance California's coast for present and future generations, which is reflected throughout the Draft Strategic Plan. The Port serves as an economic engine for the San Diego region, and in addition to our environmental stewardship mission, we promote and support coastal-dependent uses and businesses, which are valuable assets to the state, similar to the priorities established in the Coastal Act to protect coastal-dependent uses, like commercial fishing and recreational boating facilities. Further, the core values outlined throughout the Draft Strategic Plan are similar to the Port's core values. For example, the Port strives for maximum public participation, transparency, and inclusiveness and uses problem-solving and innovation to address today's challenges, such as climate change, rising costs, and growing inequities.

The following comments address areas where the Port believes additional information or context could strengthen the Draft Strategic Plan or alludes to ongoing efforts on Port Tidelands that warrants the Commission's continued support, guidance and collaboration.

Port Master Plans

California ports and harbors are important coastal institutions that drive economic growth regionally and statewide, as well as provide public coastal access, environmental education, employment, national and international commerce, national defense, and environmental stewardship and leadership along the California coast. As one of the four California ports mentioned in Section 30700 of Chapter 8 of the Coastal Act, the Port requests that the Draft Strategic Plan acknowledge other coastal zone planning documents that exist along the California coast, like port master plans. The Port recognizes and appreciates the strong coordination and communication that both Port staff and Commission staff in the San Diego office prioritize between our two agencies for numerous CDPs, PMPAs, and the PMPU; and would like to see that memorialized in the Commission's Strategic Plan to continue this commitment into the future.

Blue Economy

The Port maintains an active leadership role in the development of sustainable aquaculture and innovation in marine technology. San Diego Bay provides the unique physical landscape and market proximity to support and advance the blue economy regionally and on an international scale. The Port's Blue Economy Incubator was created in 2016 to build a portfolio of businesses and partnerships that deliver multiple social, environmental, and economic benefits to the Port and the region by removing barriers to entrepreneurs and providing funding, key assets, support



services including entitlement and permitting assistance, and pilot project facilitation. Through the Blue Economy Incubator, the Port aims to support various innovation opportunities within the blue economy, including: nature-based solutions; coastal resiliency and monitoring; shellfish and seaweed aquaculture; environmental protection and remediation; maritime decarbonization; and, ocean data, monitoring, sensing, and security. We have worked closely with the Commission's local San Diego office to permit many Blue Economy Incubator pilot projects, such as HyperKelp, the Floating Upweller System (FLUPSY), Sunken Seaweed, and ECOcrete. The Blue Economy Incubator has resulted in 35+ partnerships, \$2.35 million in funding for pilot projects, and \$5.8 million in research and development funds leveraged by blue technology companies. This important program highlights the value of investing in the blue economy, and we believe that the Draft Strategic Plan should continue to support the research and development of new ocean-based industries, as described in Objective 2 within Goal 4 "Protect marine resources". The Port also suggests the addition of an action within Objective 2 that discusses streamlining permitting pathways to encourage further development of marine technologies that provide educational opportunities, support job creation and innovation, and contribute to environmental stewardship.

Aquaculture

In addition, the Port is actively advancing shellfish and seaweed aquaculture as part of our mission to advance science and promote the growth of emerging industries with strong potential for job creation. The Sunken Seaweed project, which was advanced through the Blue Economy Incubator, is a seaweed farm located on Port Tidelands that produces 500 pounds of edible seaweed per week. This pivotal project showcases the opportunities for expanded aquaculture operations within San Diego Bay, both in-water and on land. Organizations like the Port are playing a unique role in helping to minimize barriers to entry for future aquaculture operations to be able to expand to California and, in our case, San Diego Bay. For example, with the region's temperate climate, proximity to markets, and existing shore-side infrastructure, along with the Port's roles as manager, landlord, regulator, and environmental steward, we are developing a Shellfish and Seaweed Aquaculture Program (SSAP) to support future growth of shellfish and seaweed aquaculture at waterside and landside locations in and around San Diego Bay. The Port welcomes continued collaboration with the Commission on the development of the SSAP, as well as any other future aquaculture endeavors, both in-water and on land.

The Port would like to acknowledge and thank Commissioner Wilson for his comments on aquaculture during the October 8, 2025 Commission meeting following the informational presentation given by Executive Director Huckelbridge on the Draft Strategic Plan. More specifically, Commissioner Wilson acknowledged that aquaculture innovations are happening up and down the state, and the Commission needs to provide flexibility as this industry evolves, specifically in commercial and industrial areas. As the Port continues to develop the SSAP and support shellfish and seaweed aquaculture in and around San Diego Bay, we agree with Commissioner Wilson's comments and request the Commission's guidance and support in



permitting these operations in an efficient manner. In addition, Commissioner Wilson explained that aquaculture is not limited to in-water, but the Commission needs to support adjacent land opportunities for aquaculture. Similar to Humboldt Bay, the Port has potential opportunities to support land-based aquaculture operations near our working waterfront. Like Commissioner Wilson mentioned, the Port would like to see support for aquaculture memorialized in the Draft Strategic Plan. There are currently no goals, objectives, or actions within the Draft Strategic Plan that address aquaculture innovation. We welcome the opportunity to collaborate with the Commission on revisions to the Draft Strategic Plan to reflect these comments and more clearly demonstrate the Commission's support for emerging industries, such as aquaculture, and marine technologies in the future.

Coastal Access

There are many topics where the Commission and the Port are closely aligned, and as highlighted in Goal 1 of the Draft Strategic Plan, “ensuring coastal access for all” is a shared goal between our two agencies. Coastal public access is a central theme in the PMPU, and there are many Port efforts that seek to improve access to Port Tidelands. The Port manages over twenty-three public parks and offers a variety of public accessways and recreational facilities, many of which are lower-cost, including public walkways, beaches, and boat launch ramps.

Low-Cost Visitor-Serving Opportunities

The Port has made strides to provide a range of affordable, low-cost visitor-serving opportunities for all, with the Gaylord Pacific Resort & Convention Center serving as a recent model for success. The Port would like to acknowledge and thank Coastal Commissioner Jose Preciado for his comments at the October 8, 2025 Commission meeting following the informational presentation given by Executive Director Huckelbridge on the Draft Strategic Plan. More specifically, Commissioner Preciado provided insightful commentary to the Commission about the success of the recently constructed Gaylord Pacific Resort & Convention Center on Port Tidelands in Chula Vista, California. Within the Special Provisions of the CDP for the project, the Port introduced an innovative approach to provide lower-cost recreational access at the new resort. The Permittee committed to the distribution of 150 pool passes per day, at a cost of \$10 per day, to promote affordable recreational access and visitor-serving facilities to the general public and Chula Vista residents. As Commissioner Preciado explained, the Gaylord Pacific Resort & Convention Center is just one example of how innovative approaches to lower-cost visitor-serving amenities can be successful in achieving shared goals between the Commission and the Port. While the Port is generally supportive of Actions 1.2.2 and 1.2.3, we also recommend that coordination with local agencies, such as the Port, would be beneficial to ensure the development of new strategies and innovative approaches to lower-cost recreational opportunities, including overnight accommodations, could be feasibly implemented. There is not a one-size-fits-all approach to implementing lower-cost solutions; the Port requests that the Commission develop additional



guidance, provide continued support on how financially feasible lower-cost overnight accommodations can be incorporated into new developments or redevelopment projects, and continue to collaborate with local jurisdictions, including the Port, to identify policies and strategies that can best serve our respective regions. We welcome the opportunity to work with Commission staff on the development of lower-cost recreation and overnight accommodation strategies that would help to support the development of new lower-cost recreation and overnight accommodations on San Diego Bay.

Transportation Networks and Mobility Hubs

As discussed under Goal 2 within Objective 3 “Advance climate-resilient housing and transportation planning”, the Port agrees that transportation planning is an important consideration for climate adaptation planning and is a mechanism to ensure there is coastal access for all as reflected in Goal 1 of the Draft Strategic Plan. Action 2.3.5 more specifically “encourage[s] multi-modal transportation projects that reduce greenhouse gas emissions, improve coastal access and provide new recreational opportunities”. Within the Mobility Element of the Final Draft PMPU, the Port has facilitated the shift to prioritizing the development of efficient and sustainable transportation systems on Port Tidelands, such as mobility hubs. Mobility hub networks are intended to widely connect water and land area on Port Tidelands, which includes mobility hubs for landside access and water-based transfer points to improve water access. The Port believes that prioritizing mobility hubs presents the opportunity to reduce greenhouse gas emissions, while providing more affordable transit options for waterfront visitors. Therefore, the Port strongly supports the language provided in Action 2.3.5, and we look forward to continuing to work with the Commission’s local San Diego office to permit future mobility hubs and water-based transfer points on Port Tidelands through the certification of the PMPU.

Sea Level Rise and Nature-Based Adaptation Strategies

The state faces many challenges relating to climate change and adapting to sea level rise, and the Port recognizes the importance of coastal resiliency and sea level rise adaptation planning. In 2019, the Port prepared a Sea Level Rise Vulnerability & Coastal Resiliency Report pursuant to Assembly Bill 691, which requires local trustees of public lands to prepare and submit to the State Lands Commission an assessment of how the local trustee proposes to address projected sea level rise. Since the AB 691 assessment, the Port has focused on memorializing our commitment to coastal adaptation and resiliency planning through the development of goals, objectives, and policies within Chapters 3.3 Ecology Element and Chapter 3.4 Safety & Resiliency of the PMPU, as well as implementation of adaptation strategies through development projections and the deployment of nature-based solution pilot projects. Similar to Action 2.1.3 within the Draft Strategic Plan, the PMPU contains policies that encourage the use of adaptation strategies that reflect the best available science. The PMPU also strives to provide flexibility regarding the implementation of adaptation strategies to ensure that the development of new strategies is based



on the best available science and that strategies can be implemented expeditiously. As such, the Port expresses our support for Action 2.3.4 “Explore innovative, multi-benefit sea level rise adaptation solutions for new and existing infrastructure” and Action 2.3.6 “Facilitate programmatic solutions for climate hazard mitigation and beach loss”.

The Port continues to advocate for a flexible approach to adaptation as there is not a “one-size-fits-all” solution for all shorelines. As written in the Draft Strategic Plan, the narrative for Objective 3 of Goal 2 only mentions prioritization of certain solutions, which can limit flexibility in permitting other types of strategies, such as elevation, nature-based, or hybrid strategies that are not mentioned. The Port recommends this text be revised to be more inclusive of other adaptation strategies. As a roadmap for the next five years, we encourage that this document remains flexible and avoid prioritizing or limiting the types of strategies that can be used along the state’s diverse coastline.

Nature-Based Adaptation Strategies

Throughout the Draft Strategic Plan, the Port is encouraged to see multiple mentions of stewardship, innovation, and nature-based solutions. As mentioned in our comments to the Commission’s Draft Nature-Based Adaptation Strategies (NBAS) Guidance, the Port has been building a portfolio of nature-based shoreline solutions around San Diego Bay, and we appreciate the alignment with the Commission identifying these types of solutions as a priority. Within the Draft Strategic Plan, Action 1.1.2, regarding the development and implementation of creative strategies to protect vulnerable beaches from climate change and sea level rise, and Action 1.1.5, regarding the exploration and implementation of forward-thinking approaches to safeguard public trust resources for future generations, both speak directly to the need to support and expedite the review and approval of NBAS and hybrid shoreline solutions. The Port balances a variety of coastal-dependent, coastal-enhancing, and coastal-related uses, and the Port requests the Commission’s continued support in identifying pathways to permit NBAS and hybrid shoreline solutions that complement the unique environmental landscape of the Port, including, but not limited to, our working waterfront, the Chula Vista Wildlife Reserve, and a range of commercial and recreational uses. Similar to our comments to the Draft NBAS Guidance, the Port recommends that Action 2.1.5 in the Draft Strategic Plan should expand beyond the development of guidance by working closely with other agencies to identify pathways for streamlining the permitting for these types of solutions.

Mitigation Banks

The Port is encouraged that the Commission’s Draft Strategic Plan highlights opportunities for compensatory mitigation. The Port is proposing to construct 76.5 acres of coastal wetland habitat at a former salt evaporation pond, Pond 20, in south San Diego Bay to create a mitigation bank. This would be the first wetland mitigation bank for San Diego Bay. Pond 20 is currently vacant, isolated from tidal influence, and provides little habitat value due to its salt-encrusted surface and



invasive plants. The wetland mitigation bank at Pond 20 would be a future catalyst supporting valuable ecosystem services such as increased biodiversity, improved water quality, increased carbon sequestration capacity, and more, while also providing pathways for additional wetland mitigation banks. The wetland mitigation bank at Pond 20 would also provide community benefits, by providing protection from storm surge and sea level rise, environmental education opportunities (e.g., nature viewing of the wetlands), and by creating a revenue source the Port can invest back into the community. Per Board Policy 774, once the wetland mitigation bank begins to generate net revenue, those revenues would go toward future public improvement projects and maintenance around the bayfront, with these funds specifically directed for future economic development and public improvement projects in the adjacent Imperial Beach and San Diego communities.

The Port certified the Environmental Impact Report (EIR) for the wetland mitigation bank at Pond 20 in Spring 2021. Since that milestone, we have been coordinating with the Army Corps of Engineers and other agency members of the Interagency Review Team (IRT), including representatives from the Commission, to prepare a Banking Enabling Instrument (BEI) to establish the mitigation bank. In parallel, the Port has been working with Commission staff on a PMPA to add the Pond 20 parcel into the Port's certified Port Master Plan. Continued progress on the BEI and PMPA for the wetland mitigation bank at Pond 20 would demonstrate alignment with the Draft Strategic Plan, such as Action 4.1.4.

Continued Coordination

The Port appreciates the opportunity to comment on the Commission's Draft Strategic Plan (2026-2030), and we look forward to future coordination with the Commission and others to meet the goals and objectives outlined in the Draft Strategic Plan. The Port offers continued support of the Commission's strategic planning efforts, as well as other state and federal policies to protect and support ocean and coastal communities, coastal economies, and thriving ocean ecosystems. We welcome the opportunity to work with Commission staff on revisions to the Draft Strategic Plan, as well as other opportunities to discuss and collaborate on statewide and regional goals, plans, and strategies to conserve, protect, and manage the California coast and Port Tidelands.

Please let us know if you would like to discuss any of our comments in more detail. If you have any questions or require additional information, please do not hesitate to contact me at (619) 686-6469 or lnishihi@portofsandiego.org.

Respectfully,

A handwritten signature in black ink, appearing to read "Lesley Nishihira".

Lesley Nishihira
Vice President, Planning & Development



Heal the Bay

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November 10, 2025

California Coastal Commission
301 E Ocean Blvd Suite 300
Long Beach, CA 90802

Submitted electronically via email to StrategicPlanComments@coastal.ca.gov.

RE: CALIFORNIA COASTAL COMMISSION'S 2026-2030 DRAFT STRATEGIC PLAN

Dear Honorable Commissioners and Commission Staff:

Heal the Bay is a non-profit environmental organization with 40 years of experience making the coastal waters and watersheds of Greater Los Angeles safe, healthy, and clean. We use science, education, community action, and advocacy to fulfill our mission. We would first like to recognize that we are on unceded Indigenous land. The scope of our work takes place across the lands of coastal Indigenous Peoples and Native Nations of the Tongva, Chumash, Fernandeano Tataviam Band of Mission Indians, and Kizh Nation tribes. We would like to acknowledge and pay our respects to elders past, present, and emerging, as they continue their stewardship of these lands and waters.

Heal the Bay is grateful for the opportunity to provide feedback on the 2026-2030 Draft Strategic Plan (Draft Plan). Our comments are organized by the goals outlined in the strategic plan below.

Goal 1: Ensure coastal access for all

- Objective 1: Plan for the next 50 years of public coastal access
- Objective 2: Prioritize affordable access, recreation and overnight accommodations
- Objective 3: Break down barriers to coastal access
- Objective 4: Enforce the public's right to access the coast

Heal the Bay is in broad support of everything outlined in this goal, including all objectives and actions. The Coastal Commission's expertise and leadership of these initiatives is highly valued by our organization. Though we recognize the many strides taken to widen access to the coast, we have found in our region that expensive parking, hidden access points, and homeowner intimidation still play a large role in reducing public access. For these reasons we are grateful for your continued leadership and look forward to collaborating and supporting your efforts. We would like to specifically uplift action 1.3.1 to "Support co-management and land return efforts for California Native American tribes" as critical to the success of this goal and should apply to both federally recognized and non-federally recognized Tribes. Traditional Ecological Knowledge is integral to successful coastal management, and we look forward to continued prioritization of this pathway.

Another action of specific interest is 1.3.5 to "Grow the Whale Tail Grant program through outreach to new communities and identification of new funding sources." Our organization is a proud partner with the Coastal Commission as a whale tail grant recipient as well as the LA County Coastal Cleanup Day and



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Heal the Bay

Adopt-a-Beach program coordinator. These programs provide crucial marine debris reduction and data collection along our coast and other water bodies, but perhaps more importantly, irreplicable education and outreach opportunities both at the beach and to inland communities. These opportunities empower our local communities to make a positive impact and find hope in collective action while collecting much needed data to support strong policy action. We support the Commission's continued support of the Whale Tail Grant program in the upcoming strategic plan.

Goal 2: Plan for resilient communities

Objective 1: Ensure LCPs address sea level rise and climate change

Objective 2: Prioritize principles of environmental justice in resilience planning efforts

Objective 3: Advance climate-resilient housing and transportation planning

Heal the Bay recognizes the critical need to integrate sea level rise and climate change into the structure of our communities, especially as we saw record land movement in Rancho Palos Verdes in 2024, beach closures in northern LA County due to failing infrastructure from rising seas and high tide events, and the unprecedented wildfires in LA in early 2025. We believe that **dedicated funding to naturally protect against sea level rise through strategies such as restoring and cultivating wetlands, dunes, and living shorelines is a critical part of this, along with avoiding coastal hard armoring and ensuring adaptation strategies don't harm natural ecosystems or restrict public beach access.** For these reasons, we are in strong support of prioritizing actions 2.1.1, 2.1.5, and 2.3.4. We are supportive of this goal and the associated objectives and would like to learn more details about how the Commission plans to implement them.

We note that, though mentioned in Goal 2's preamble, managed retreat is not clearly defined in a specific action anywhere in the Draft Plan. Heal the Bay recommends **integrating language specific on managed retreat into an action in the finalized strategic plan**, as we recognize that equitable managed retreat is inevitably part of our coastline's future. Heal the Bay respectfully offers the following recommended language for this additional action:

Action 2.3.7: Incorporate managed retreat planning efforts into land use, housing, and transportation adaptation efforts wherever possible.

Another concern is the lack of water quality improvement actions in the Draft Plan. Heal the Bay was originally founded in 1985 in response to water quality concerns that pose a public health risk to recreational beachgoers. Though the landscape of water pollution has changed in the last four decades, those concerns are just as prevalent today and Heal the Bay advocates for improvements in regulatory frameworks to ensure industrial and urban runoff are properly addressed. The Commission's previous Strategic Plan from 2020-2025 contains a specific objective (3.8) to "Avoid and Mitigate Adverse Impacts of Development on Water Quality." We believe it critical to **include language that addresses the impact of poor water quality on coastal access in the strategic plan update to ensure this work continues to be prioritized.** Heal the Bay's [Beach Report Card](#) lists letter grades indicating the water quality at beaches up and down the entire California coast, which is used to inform beachgoers which sites are



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safe to swim at and which may pose a high risk due to bacteria levels. Here in Los Angeles County, Mother's Beach is an enclosed beach in Marina del Rey that attracts young families because of its gentle waves, but it is also consistently rated unsafe for swimming due to high bacteria levels from the lack of circulation in these waters. This local example demonstrates the importance of addressing water quality in the scope of coastal access and land use planning in the coastal zone and funding research on how to improve water quality in historically polluted beaches such as Mother's Beach must be prioritized by the Commission.

Goal 3: Improve external engagement and communication

Objective 1: Engage more People

Objective 2: Improve Commission processes and transparency

Objective 3: Foster stronger relationships with California Native American tribes

Heal the Bay is in strong support of this goal, especially Objective 3 and action 3.1.2 to "Strengthen and expand the Commission's Spanish language program through increased opportunities for live translation at hearings and translation of Commission-produced materials." We reiterate the importance of fostering strong relationships with Indigenous Nations, including those that are not federally recognized.

Goal 4: Protect coastal resources

Objective 1: Preserve and restore coastal wetlands and habitats

Objective 2: Protect marine resources

Objective 3: Prioritize resilience for coastal agriculture and open space

As an organization heavily involved in understanding the impacts of the 2025 LA wildfires, we are in strong support of actions 4.1.2, to "expedite review of wildfire resilience and vegetation treatment projects that will protect vulnerable habitats and species," and 4.3.4 to "develop tools to assess the vulnerability of coastal resources to increasing wildfire risks." We also urge government-to-government coordination with the State Water Resources Control Board to **establish standards for contaminants from wildfires and urban fires**. These standards should focus on protecting coastal ecosystems from pollutants like heavy metals and chemicals while also setting human health guidelines for safe recreational water use in fire-impacted areas. More specifically to the Commission's past work, the efforts to rebuild the homes along Pacific Coast Highway in Malibu will set an important precedent in the larger picture of sea level rise and managed retreat and ensuring those efforts are both equitable and take the very real threats of sea level rise and beach erosion into account in the Plan are essential.

We note the lack of mention of aquaculture initiatives in the Draft Plan, which is concerning. In the 2020-2025 Strategic Plan, Objective 3.3.5 to "Develop Marine Aquaculture Guidance" uplifted this need, but the current plan lacks language on aquaculture altogether. Through Heal the Bay's Aqua Lab and close partnership with the Santa Monica College Blue Economy and Climate Action Pathways (BECAP) program, Heal the Bay's aquarium has become an established figure in the sustainable aquaculture sector. We identify a need for **dedicated funding towards aquaculture and sustainable fisheries management**. This funding should address aquaculture job training and workforce development,



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aquaculture as a food source at a time when food insecurity in Los Angeles is at a startlingly high rate, and aquaculture as a way to preserve endangered species. Beyond this, Heal the Bay recognizes the need for responsible siting of offshore aquaculture to avoid environmental harm and calls for stronger state-led policy frameworks to ensure marine aquaculture is ecologically sustainable and does not conflict with Marine Protected Areas or traditional fisheries.

Action 4.2.5: Develop guidance for planning and permitting marine aquaculture projects.

One thing is certain: the Commission will have its fair share of obstacles in the coming years. Coastal management has entered a new era, and the Commission is under siege on many fronts. The litany of legislation on local, state, and federal levels over the past year is clearly an attempt to undermine the Coastal Commission's jurisdiction and authority. However, your team's dedication to equitable coastal access rings true and Heal the Bay is honored to partner with your team. We believe that California's coastline is not for developers and billionaires—it is for the people. Your work ensures it remains that way and will continue to have Heal the Bay's support.

Thank you again for the opportunity to provide additional detail to our form submission on the Commission's 2026-2030 Draft Strategic Plan. For any questions or additional details on these comments and recommendations, please do not hesitate to contact me at zcollins@healthebay.org

Sincerely,

Zoe Collins
Marine Protected Area Program Coordinator
Heal the Bay



CITY OF
HUNTINGTON BEACH

Department of Community Development

November 4, 2025

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Submitted via email to: StrategicPlanComments@coastal.ca.gov

**RE: CITY OF HUNTINGTON BEACH COMMENTS ON CALIFORNIA COASTAL
COMMISSION DRAFT 2026-2030 STRATEGIC PLAN**

To Whom It May Concern,

Thank you for the opportunity to submit comments on the Draft California Coastal Commission (CCC) 2026-2030 Strategic Plan dated September 2025. The City of Huntington Beach appreciates CCC's public outreach efforts and offers the following comments for your consideration.

Consistent with Coastal Commission's Objective 1 and Action 1.1.1, the City of Huntington Beach welcomes partnerships and collaboration with the Coastal Commission and organizations, including Caltrans in areas where safety measures and street improvements could be supported to promote multi-modal access and reduced speeds in conjunction with compatible land uses. While the City understands the importance of affordable access and minimizing barriers to coastal access specifically with Objectives 2 and 3, the City suggests incorporating actions to engage local agencies and consider their interests and limited resources to balance community needs, conflicts, and enforcement with coastal access and recreation policies. Specific guidance should acknowledge conflicts regarding sea level rise and lower cost visitor serving accommodations/short term rentals that can be an impediment to planning for residential development in the coastal zone and reaching attainable and realistic solutions. The City supports Goal 5 as it experiences similar organizational changes and shared views of staff retention in Objective 2. With various state mandates and environmental and social challenges, local governments are expected to provide expeditious solutions and support community needs (local and general) as resources are scarce. Actions to recognize competing policies and divided interests exist among government agencies would promote collaboration and a willingness to achieve mutually beneficial outcomes between groups.



CITY OF
HUNTINGTON BEACH

Overall, the City is supportive of aspects of the draft Strategic Plan as the Coastal Commission continues to safeguard coastal resources. The suggestions noted in this letter help further the success of state and local partnerships. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Jill Bos".

Jill Bos, AICP
Deputy Director

c: Jennifer Villasenor, Director of Community Development
Ricky Ramos, Planning Manager

November 4, 2025

California Coastal Commission
455 Market Street, Suite 228
San Francisco, CA 94105

VIA EMAIL: StrategicPlanComments@coastal.ca.gov

SUBJECT: California Coastal Commission 2026-2030 Draft Strategic Plan

Dear California Coastal Commission Staff:

Thank you for the opportunity to comment on the California Coastal Commission's *2026-2030 Draft Strategic Plan*. We applaud the Coastal Commission's ongoing commitment to maintaining and enhancing the public's access to the coast, and the City of San Diego looks forward to ongoing opportunities for collaboration to achieve our shared goals of equitable coastal access, building climate-resilient communities and protecting and enhancing sensitive biological resources.

The Coastal Commission's successes in ensuring the public's access to the coast are truly remarkable. Californians and visitors from across the world benefit from these efforts every day, enjoying what in other places may be reserved for private interests or the wealthy only. This open public access to the state's great beaches benefits local agencies across the state as well. San Diego, in particular, has benefited from incredible recreational opportunities, which contribute greatly to its robust tourist economy, fueled by this open public access fought for and protected by the Coastal Commission. The City strongly urges the Coastal Commission to focus its efforts on continuing this important work.

With that general support in mind, the City has the following specific comments for consideration for inclusion in the final Strategic Plan.

Goal 1 (Ensure Coastal Access for All)

- We agree that removing barriers to the coast is of the utmost importance. The draft Strategic Plan refers to "physical and non-physical barriers" to the coast. We encourage the Coastal Commission to expand on the intent of the reference to non-physical barriers and encourage an ongoing emphasis on the importance of reducing physical coastal barriers.
- The City's adopted Climate Resilient SD plan calls for nature-based solutions to address climate change, which is in line with this objective to preserve beaches and limit shoreline armoring. The City encourages the Coastal Commission to consider interim measures that may be needed to address public health and safety hazards while planning more long-term nature-based infrastructure solutions that ultimately will best protect our residents and the coast.
- Lower-cost visitor accommodations provide opportunities for those who do not live at the coast to enjoy it with friends and family. The City encourages the Coastal Commission to focus its efforts on lower-cost accommodations in areas where such accommodations make the

most sense. Specifically, in areas that have direct access to the beach and are in areas where people will most likely desire to stay on a coastal vacation. We also encourage the Coastal Commission to work with other agencies to identify opportunities for lower-cost visitor accommodations on publicly owned land. Relying on private development for these goals is unrealistic, faces legal restrictions and is operationally complicated to implement to achieve the ultimate shared desired outcome.

- In developing the Local Coastal Program and Coastal Development Permit guidance to help local governments implement equitable access programs, we encourage the Coastal Commission to specifically consider implementation challenges, legal constraints and overall fiscal resource limitations.
- Enforcement should remain a high priority to ensure that the regulatory and policy work done is most fully achieved. We look forward to collaborating with the Coastal Commission to assist in the enforcement of violations that restrict public access or harm sensitive resources.

Goal 2 (Plan for Resilient Communities)

- We applaud the recognition that parcel-by-parcel application of permit conditions can result in a fragmented and less efficient approach to important issues and urge the Coastal Commission to focus on programmatic regulatory approaches and funding opportunities at scale to address California's biggest and most challenging issues.
- The City recognizes the need to consider the risks of sea level rise, flooding, erosion and other coastal hazards in policy and management of the coastline to ensure thriving coastal communities and ecosystems. We acknowledge the Coastal Commission's efforts to further this through SB 272 and the required updates to LCPs. Designated funding for the Commission Local Assistance LCP Grant Program will greatly facilitate local governments' ability to complete the robust analysis and LCP updates required. We appreciate that local governments who have an approved LCP will be prioritized for future funding.
- The City acknowledges the Commission's work to provide guidance on the implementation of nature-based solutions and urges the Commission to facilitate streamlined approval processes and clear implementation guidance for these types of projects that support coastal resources, public access, recreation, and environmental stewardship.
- The City strongly supports advancing climate-resilient housing and transportation planning by advancing smart growth strategies that reduce greenhouse gas emissions and vehicle miles traveled and support resilient, equitable development. We acknowledge the Coastal Commission for recognizing an urgent need for affordable housing in the Coastal zone, particularly to support the State's coastal workforce. We are also strongly in support of work to align Local Coastal Programs with state housing policies, *and encourage the same for state climate policies* (Action 2.3.3).
- The City strongly supports multi-modal transportation projects, such as converting vehicle lanes and on-street parking to bicycle and transit lanes and wider sidewalks, that reduce greenhouse gas emissions and improve coastal access and recreational opportunities, and encourages specific recognition that these modalities should be prioritized over cars, with an emphasis on increased access to the coast overall.

Goal 3 (Improve External Engagement and Communication)

- The City agrees with the importance of inclusive public engagement and encourages the Coastal Commission to review the [City's Draft Inclusive Public Engagement Guide](#), which provides a comprehensive toolkit for City staff to use to ensure inclusive participation at all levels of City government. The Guide includes 35 techniques for engaging the public effectively, many of which go beyond traditional engagement techniques to engage those who have not traditionally engaged with the government.
- While not opposed to holding a hearing in inland locations once a year, we encourage the Coastal Commission to also engage [using other techniques](#), such as focus groups, hybrid meetings, surveys and social media in non-Coastal areas throughout the year.
- All government agencies have opportunities to improve processes and transparency. While the draft Strategic Plan identifies opportunities for streamlined Coastal Development Permit applications and appeals, the City also strongly urges the Coastal Commission to focus on streamlining the process for amending Local Coastal Programs. Local Coastal Programs are higher-level policy documents and regulations that set the baseline for future implementation. To achieve the Coastal Commission's plans to address issues comprehensively, rather than through a parcel-by-parcel approach, a shift to focus on streamlining the amendment process for Local Coastal Programs is just as - or even more - important.
- The City agrees with the Coastal Commission that there is need to foster stronger relationships with Native American tribes. Through the City's Coastal Resilience Master Plan, the City has engaged with Kumeyaay tribes regarding the tribal cultural history, traditional ecological knowledge, cultural practices, and opportunities for co-stewardship of the coast. This engagement and relationship building takes time and requires ongoing communication and coordination. This requires both funding and staff resources to support as well as space to explore policies and practices that create space for continued tribal connection to and stewardship of the coast.

Goal 4 (Protect Coastal Resources)

- This goal rightfully identifies threats to coastal resources from urban expansion, which must be addressed by focusing on already-developed infill development. This calls for reducing regulatory barriers that can often disincentivize infill development, including increased regulatory requirements. This, of course, should be balanced with appropriate regulations and prohibitions to protect the State's most sensitive and undeveloped coastal resources.
- The City agrees on a programmatic approach to fast-tracking reviews for restoration projects in line with the State's Cutting the Green Tape initiative. The single-most effective way to do this would be through a *ministerial* process for these important projects without a lengthy, costly, and uncertain hearing process. A ministerial process provides objective requirements for projects to ensure that they protect and enhance the environment and coastal access, while providing certainty and reducing the time it takes to make these projects a reality. The City also encourages the Coastal Commission to take a leading role in this needed streamlining for these important projects.

- The actions identified in the draft Strategic Plan for this goal currently lack any actions needed to encourage development in urban areas to preserve open space. The City strongly encourages the Coastal Commission in the Strategic Plan to recognize that the best way to balance the State's needs for affordable housing as well as preservation of open space is to focus on infill development opportunities in the Coastal Zone.

The City of San Diego looks forward to ongoing opportunities for collaboration to achieve our shared goals of equitable coastal access. Please contact myself at VonblumH@sandiego.gov or Deputy Director Seth Litchney at SLitchney@sandiego.gov with any questions or for further discussion and collaboration.

Sincerely,



HEIDI VONBLUM
City Planning Director

cc: Casey Smith, Deputy Chief Operating Officer
Walter Bishop, Director of Government Affairs, Mayor's Office
Chris Ackerman-Avila, Senior Policy Advisor, Mayor's Office
Randy Wilde, Senior Policy Advisor, Mayor's Office
Elyse Lowe, Director, Development Services Department
Rania Amen, Director, Engineering & Capital Projects Department
Andy Field, Director, Parks and Recreation Department
Tait Galloway, Deputy Director, City Planning Department
Seth Litchney, Deputy Director, City Planning Department
Kelley Stanco, Deputy Director, City Planning Department



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November 7, 2025

Ms. Meagan Harmon, Chair
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Subject: California Coastal Commission 2026-2030 Strategic Plan Comment

Dear Chair Harmon,

On behalf of UC San Diego's Scripps Institution of Oceanography, I appreciate the opportunity to provide comments on the draft California Coastal Commission Strategic Plan for 2026-2030. As a leading institution in advancing earth and climate sciences, Scripps Institution of Oceanography values collaborative efforts that strengthen science-based policy. Scripps has a long history of leading California's ocean and coastal research and observation programs that have informed federal, state, and regional decision-making. The robust observations, monitoring, and modeling maintained and operated by Scripps are critical to help achieve several key Strategic Plan goals and objectives.

Goal 2. Plan for Resilient Communities

Objective 1: Ensure Local Coastal Plans (LCPs) address sea level rise and climate change

Action 2.1.3 Develop additional knowledge and create new or updated guidance on innovative climate adaptation strategies that reflect the best available science

Supported by the US Army Corps of Engineers and the California Department of Parks and Recreation, Scripps' Coastal Data Information Program (CDIP) Waves and Beaches has provided near-real-time coastal wave and nearshore data for California since 1975. The longevity of observations provides historical data necessary to understand beach erosion, impacts on habitat and ecosystems, shoreline infrastructure, and regional sediment management. In partnership with the State, Scripps advances coastal resilience through cliff failure early warning system development, airborne LiDAR and hyperspectral imaging to shoreline change, and flood forecasting tools to aid storm surge, king tides, and El Niño preparedness.

CDIP's monitoring and modeling efforts have advanced the understanding of beach erosion, flooding, El Niño impacts, cliff instability, and wave dynamics. For example, Scripps is supporting a \$32 million USACE sand replenishment project in Encinitas and Solana Beach by tracking effectiveness in real time, helping optimize design, reduce costs, and maximize benefits for communities, ecosystems, and recreation. Scripps researchers and academic partners are also developing a biodiversity inventory of rocky intertidal habitats, currently at risk for loss due to sea-level rise, which may help inform the Coastal Commission's goals on Environmental Sensitive Habitat Areas protection.

Scripps is also exploring early warning systems for cliff failure to protect public safety and infrastructure and has developed flood forecasting tools to help vulnerable coastal communities prepare for storm surge, king

tides, and El Niño events. In partnership with California State Parks, this capability is expanding statewide. Without these data, lives and property would be at greater risk.

The Southern California Coastal Ocean Observing System (SCCOOS) at Scripps collects, integrates, and delivers coastal and ocean observations to improve safety, protect maritime commerce, and strengthen our coast's resilience to climate impacts. SCCOOS publicly available environmental data and forecasts are leveraged by stakeholders to inform local sea-level rise adaptation planning and project implementation, short-term decision-making, and long-term assessments. For example, in partnership with CDIP, SCCOOS plays a critical role in supporting the California Flood Network by providing a 5-day flood warning for nine Southern California locations.

Scripps coastal monitoring and research align with this Strategic Plan goal by providing a scientific foundation for LCPs to address sea level rise and climate change.

Goal 4: Protect coastal resources

Objective 2: Protect marine resources

Action 4.2.3 Continue participating in offshore wind energy planning, including the design of environmental monitoring and adaptive management frameworks

Established in 1949 as an academic research partnership with between Scripps, NOAA National Marine Fisheries Service, and the California Department of Fish and Wildlife, California Cooperative Oceanic Fisheries Investigations (CalCOFI) is a long-term oceanographic and marine ecosystem monitoring and research program that surveys the physical, biogeochemical, and biological dynamics of the marine environment with the goal of serving data and science in support of sustainable marine resource management. The CalCOFI program is one of the longest-running ocean monitoring programs in the world and provides long-term time-series data on oceanographic variables, fish spawning biomass, and ecosystem productivity in the California Current. These time series data are critical for understanding climate change along the California coast, marine protected area management, and coastal resilience planning.

CalCOFI's longstanding monitoring has supported the siting and development of offshore renewable energy sources by supplying essential environmental data and ecological insights that help balance energy production with the protection of marine ecosystems, ensuring that renewable energy projects are implemented sustainably and with minimal impact on oceanic habitats.

SCCOOS and the Central/Northern California Coastal Ocean Observing System can inform offshore wind deployment and operations through their ocean surface current and wave observations. High Frequency Radar provides real-time ocean surface current speed and direction data, supporting critical marine ecosystem health and connectivity monitoring capabilities. Furthermore, advanced acoustic and environmental sampling technologies used by Scripps researchers can help better understand potential impacts to large marine mammals, some of which include displacement from important habitats, entanglement, increased underwater noise levels, collision, and exposure to electromagnetic fields from cabling. Offshore wind operations may attract or repel animals, and these behavioral changes may affect species diversity, trophic interactions, feeding and reproduction activities, and biomasses. A robust ocean monitoring program is needed to improve the biodiversity and ecosystem status baselines, along with its continuation during the construction and operations phases within the offshore wind lease areas, as well as the distance between ports and development sites.

Objective 3: Prioritize resilience for coastal agriculture and open space

Action 4.3.4 Develop tools to assess the vulnerability of coastal resources to increasing wildfire risks

The tragic Los Angeles wildfires unleashed a plume of urban-wildfire ash that contained a toxic mixture of health-adverse chemicals such as heavy metals, polycyclic aromatic hydrocarbons, and dioxins. In addition to

the deposition of this ash on surrounding coastal communities and shorelines, the Santa Ana winds pushed the plume of toxic ash hundreds of miles out to sea. CalCOFI was at sea off the coast of Los Angeles during this time and sampled urban-wildfire ash fallout offshore. This opportunist ocean sampling collection provides a unique opportunity to directly assess the magnitude of the ocean and coastal impacts of toxic inputs from this event. SCCOOS Automated Shore Station sampling operations and harmful algal bloom (HAB) monitoring capabilities at Newport Beach Pier (real-time HABs) and Santa Monica Pier (weekly HABs) informed wildfire response and mitigation efforts. This case demonstrates the need for coastwide ocean ecosystem monitoring readiness in response to wildfire events and catastrophes, strengthening California's resilience and ability to better understand and assess impacts to environmental and human health.

In Conclusion:

California's coastal resilience leadership is critical given uncertain federal funding. To realize the Strategic Plan vision, the State must establish reliable funding mechanisms to support science-based decision-making, helping ensure the resilience and vibrancy of California's coastal environment, economy, and natural resources. Thank you for the opportunity to comment. Scripps appreciates the Coastal Commission's climate leadership and looks forward to continued collaboration.

Sincerely,

A handwritten signature in black ink, appearing to read "Meena Wadhwa". The signature is fluid and cursive, written in a professional style.

Meena Wadhwa, Ph.D.
Vice Chancellor, Marine Sciences
Director, Scripps Institution of Oceanography, UC San Diego

cc: Dr. Kate Huckelbridge, Executive Director, California Coastal Commission
Kathleen Ritzman, Associate Director
Ian Clampett, State and Local Government Relations Director



November 10, 2025

To: StrategicPlanComments@coastal.ca.gov

CC: Meagan Harmon, Chair, California Coastal Commission, Kate Huckelbridge, Executive Director, California Coastal Commission

Re: Surfrider Comments on the Coastal Commission DRAFT 2026-2030 Strategic Plan

Dear Commissioners and Staff,

Surfrider Foundation commends the California Coastal Commission for developing a comprehensive and forward-thinking Strategic Plan that reflects both the accomplishments of the past 50 years and the challenges ahead. The plan appropriately prioritizes coastal access, climate resilience, resource protection, and meaningful public engagement—all values that align closely with Surfrider's mission to protect our ocean, waves, and beaches.

We offer the following suggestions to strengthen specific objectives and actions within the plan. These recommendations are intended to enhance the Commission's ability to address critical gaps in beach protection, public access, and climate adaptation.

GOAL 1: Ensure Coastal Access for All

- **Objective 1: Plan for the next 50 years of public coastal access**
 - **Action 1.1.4 - Suggested Revision:**
 - **Current:** "Modernize resources for local governments and other asset managers regarding accepting and maintaining accessways"
 - **Suggested:** "**Simplify the process and** modernize resources for local governments and other asset managers regarding accepting and maintaining accessways"
 - **Rationale:** Many coastal access offers are never accepted, in part due to bureaucratic complexity. Simplifying the acceptance process itself in any way the Commission can—not just the materials—will help convert more offers into realized public access.
- **Objective 2: Prioritize affordable access, recreation and overnight accommodations**
 - **Action 1.2.3 - Suggested Revision:**
 - **Current:** "Explore innovative approaches to publicize expand use of existing lower-cost overnight accommodations and recreational opportunities"
 - **Suggested:** "Explore innovative approaches to publicize, expand use of, **and increase the supply** of lower-cost overnight accommodations and recreational opportunities"
 - **Rationale:** Marketing existing facilities is important, but many existing lower-cost accommodations in high-demand areas are already at

capacity. Therefore, addressing capacity constraints requires creating additional lower-cost accommodations in popular coastal areas.

- **Objective 3: Break down barriers to coastal access**
 - **New Action 1.3.6:**
 - **Add:** "Develop guidance to help local governments identify and eliminate barriers to coastal access—including economic, cultural, and social barriers—and foster welcoming beach environments for all communities"
 - **Rationale:** While existing actions address tribal access and education, there is no specific action targeting economic barriers (excessive parking fees, exclusionary permits) or the cultural and social barriers that make beaches feel unwelcoming to BIPOC and other underrepresented communities. This addition addresses both dimensions of access equity.

GOAL 2: Plan for Resilient Communities

- **Objective 1: Ensure LCPs address sea level rise and climate change**
 - **New Action 2.1.6:**
 - **Add:** "Simplify and expedite the amendment process for minor LCP updates, particularly those that advance Coastal Act priorities such as affordable housing, public access, and climate adaptation"
 - **Rationale:** The current LCP amendment process can be complex and time-consuming, even for minor updates. Streamlining this process will help local governments make iterative improvements that advance coastal resilience and access without bureaucratic delays.
- **Objective 3: Advance climate-resilient housing and transportation planning**
 - **Action 2.3.4 - Suggested Revision:**
 - **Current:** "Explore innovative, multi-benefit sea level rise adaptation solutions for new and existing infrastructure"
 - **Suggested:** "Explore innovative, multi-benefit sea level rise adaptation solutions for new and existing infrastructure, including voluntary property buyout programs"
 - **Rationale:** The Goal 2 introduction mentions voluntary buyouts as an adaptation tool, but they are not reflected in any action. Including them here will help establish a clear alternative to shoreline armoring for high-risk properties whose insurability and overall value will decline as storm surge increases amid rising sea levels.

GOAL 3: Improve External Engagement and Communication

- **Objective 1: Engage more people**
 - **New Action 3.1.6:**

- **Add:** "Develop and provide online trainings and resources to help the public effectively participate in Commission processes, including submitting comments, filing appeals, and engaging in LCP development"
- **Rationale:** While the plan includes actions to improve website accessibility and expand outreach, there is no action focused on teaching people how to actually engage with Commission processes. Online trainings would remove barriers to participation and empower new voices in coastal decision-making. The Surfrider network appreciated a Commission online training from earlier this year about how to provide comments at Commission meetings, for example.

GOAL 4: Protect Coastal Resources

- **Objective 1: Preserve and restore coastal wetlands and habitats**
 - **New Action 4.1.6:**
 - **Add:** "Protect sandy beach ecosystems as environmentally sensitive habitat areas (ESHA) and incorporate beach habitat considerations into LCP and CDP review"
 - **Rationale:** Sandy beaches can provide critical habitat for numerous species including shorebirds, grunion, and invertebrates, and can qualify as ESHA under the Coastal Act. However, they are not consistently recognized or protected as such across all coastal jurisdictions. Explicitly prioritizing beach ecosystems in ESHA evaluations will strengthen their protection where appropriate.
 - **New Action 4.1.7:**
 - **Add:** "Develop guidance and enforcement strategies to minimize beach sand loss from shoreline armoring and prioritize alternatives including nature-based solutions, managed retreat, and removal of obsolete armoring structures"
 - **Rationale:** Shoreline armoring is one of the greatest threats to California's beaches, causing sand loss and habitat destruction. While the plan mentions protecting beaches from climate change, it lacks specific actions to address armoring impacts. This action aligns with Coastal Act Section 30235's requirement to mitigate impacts on sand supply and provides clear alternatives.
- **Objective 3: Prioritize resilience for coastal agriculture and open space**
 - **New Action 4.3.5:**
 - **Add:** "Assess vulnerability of public coastal recreation areas and open space lands to climate change impacts and develop adaptation strategies"
 - **Rationale:** While the plan addresses agricultural lands and timberlands, it does not explicitly address climate vulnerability of public coastal recreation areas and open space—including state parks, beaches, coastal trails, and recreation areas—that are essential to public access and the

coastal economy. These open space resources deserve the same proactive adaptation planning.

GOAL 5: Build and Maintain a Resilient Organization

- While we support all actions under Goal 5, we emphasize that adequate staffing across all Commission programs is foundational to achieving the ambitious goals outlined in this Strategic Plan. Delays in permitting, enforcement, LCP reviews, and public engagement are often the result of capacity constraints. Meanwhile, chronic and even short-term understaffing can hamper the resilience of existing staff, who may find themselves overworked and facing burnout as a result of staff shortages and/or a Commission operating at suboptimal capacity due to lack of resources. We urge the Commission to prioritize securing resources for comprehensive staffing needs, building on the enforcement-specific staffing action (1.4.1) already included in the plan.

Conclusion

Surfrider Foundation appreciates the opportunity to comment on this Strategic Plan and looks forward to supporting its implementation. The Commission's leadership over the past 50 years has been instrumental in protecting California's coast, and this plan positions the agency to meet the next half-century of challenges with innovation, equity, and resolve.

We stand ready to partner with the Commission in advancing these shared goals.

Respectfully submitted,

Mitch Silverstein
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