



April 18, 2023

To: City of San Diego Historical Resources Board  
Elizabeth Shearer-Nguyen

Re: **National Register Of Historic Places Nomination for La Jolla Coastal Historical District**

The Sierra Club San Diego Chapter and the Sierra Club Seal Society have become aware of the submission to the National Register of Historic Places Nomination for the La Jolla Coastal Historical District.

We recognize the efforts to preserve this area of particular historical significance and want to bring to your attention information about La Jolla's coastal area's diverse and unique wildlife protected by municipal codes and California Coastal Commission Permits that regulate seasonal public access to beaches and rocky outcroppings that weren't fully described in the nomination document. The nomination document defines the requested border for preserving beach access and rocky outcroppings up to the mean high tide line. We are specifically addressing the Contributing Resources items 18, 20, 21, 27, 28 and 29. We would like to add an important dimension concerning the protection of its unique wildlife and natural marine environment, in view of the increase in tourism that it attracts.

During the period identified, the submission alludes to the conflict of "Nature vs Leisure" between those advocating for an emphasis on "natural beauty" vs "creating a playground for children and adults". We would argue that the visiting public is now predominantly attracted to the area for its natural beauty and wildlife viewing opportunities which has contributed to the La Jolla Cove being voted in the top 10 beaches in the USA. In fact, most social media comments and reviews mention seals and sea lions as one of the main attractions, and pinnipeds are used in many businesses advertising and websites promoting the area, including restaurants, shops, kayak, diving, and snorkel tours and the airport.

In view of the large numbers of visitors crowding the coastline, climbing on the fragile bluffs and rocky areas, visiting the tide pools, trying to get close to pinnipeds inhabiting the area, it has become obvious that wildlife in the coastal areas need protection and, in some cases and seasons, public access needs to be restricted due to nesting seabirds protected by the Migratory Bird Treaty Act, breeding harbor seals and California sea lions, fragile flora and fauna and increased erosion from an abundance of visitors.

We are concerned that the inclusion of these fragile coastal areas as part of this historic district should not inhibit the efforts by the California Coastal Commission and the City of San Diego to put in place the necessary management dispositions to protect coastal wildlife. We would therefore request:

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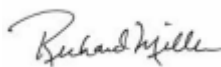
***<http://sandiegosierraclub.org>***

- Acknowledgement that public access sometimes needs to be restricted when this leads to excessive effects on flora and fauna, increased erosion as well as harassment and disturbance of wildlife.
- Acknowledgement of the extent of the closure of the breeding area for sea lions (protected by NOAA under the Marine Mammal Protection Act) encompassing Point La Jolla and Boomer Beach during the sea lion pupping season from May 1st to October 31st. The city has worked with the CA. Coastal Commission to propose a year-round closure of Pt. La Jolla due to excessive tourism and public safety issues. The historic trail opposite the bridge club is left open year-round for ocean access by experienced users.
- Acknowledgement that engineering solutions inhibiting access to Point La Jolla and Boomer Beach by climbing over the low wall are being considered as a required condition of the California Coastal Commission's Coastal Development Permit for sea lion protection. This would include the installation of some type of railing or fencing along the wall to avoid people from climbing over, causing excess erosion, trampling of plant life and approach of wildlife (birds and sea lions using the area). The wall itself is also undermined by extreme erosion at its base.
- Acknowledgement that any renovations to the breakwater at Children's Pool should keep the current beach configuration which serves as a haul out and breeding area for harbor seals (protected by NOAA under the Marine Mammal Protection Act). Any renovations would require authorization from NOAA and would need to involve limiting disturbance to protect the breeding area.
- Explicitly recognizing the protection of the unique coastal wildlife of the area and acknowledgement that public access should not undermine the preservation of its natural attraction. This wildlife is unique to this area due to the exceptional situation of the underwater canyons, Marine Protected Areas and kelp forests making it unlike any other on the California coastline which is why pinnipeds and birds have established breeding and nesting areas.

**For the reasons outlined above, we would request that the historical district submission excludes the immediate coastal areas consisting of rocky bluffs and beaches which are already protected from development by the CCC and are inhabited by wildlife which requires state and federal protections and sometimes restrictions to coastal access by the public.**

We have also referred to some specific feedback on items 20 through 22, in an appendix.

We look forward to working towards a solution that preserves both the important historical context of this area as well as its exceptional natural beauty and wildlife.



Richard Miller  
Sierra Club San Diego Chapter Director



Robyn Davidoff  
Sierra Club Seal Society Chair

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## Appendix

Item 20: Pt. La Jolla, correction - is no longer a popular place for snorkeling and fishing as the seas are rough and there is a steep drop off into the ocean from the rocks. The MPA extends to part of this rocky outcropping where fishing is not allowed.

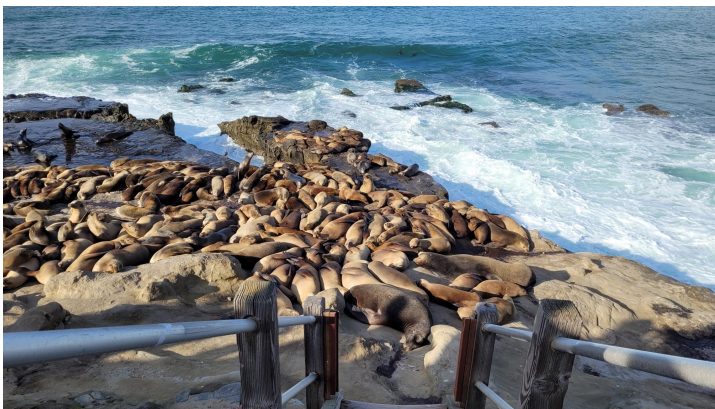
Item 21: Boomer Beach, correction - while this area used to attract highly experienced body surfers, the area is dangerous with strong rip tides. City data collected between May 1 - Oct. 31, 2022, showed an average of 5 people used this historic trail per week.

Item 22: Coastal flora canvas surrounding the bluffs have been diminished from excessive tourism climbing over the low wall resulting in erosion affecting the stability of the cliffs.

The following photos provide a look at the coastal areas being nominated and the unique wildlife that draws (excessive) high levels of tourism and damage to the coastline. The CCC permits for the seals and sea lions require seasonal closures to the area to provide public safety and the safety of the seals and sea lions protected by the Federal Marine Mammal Protection Act.



**Pt. La Jolla** rocky outcropping and precipitous drop to Boomer Beach which has strong rip tides and no lifeguards. The sidewalk and low masonry wall provide ideal viewing of the sea and year-round resident sea lions.



**Pt. La Jolla**, wooden stair access is not possible without disturbing the sea lions protected by the Marine Mammal Protection Act.

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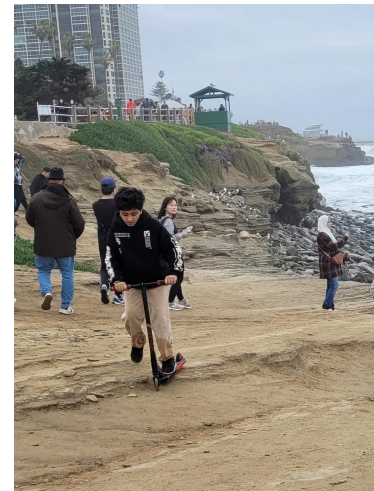
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**Pt. La Jolla:** experiences tourism of 300 people per hour who are attracted by sea lions. This level of tourism causes erosion of the sandstone cliff, trampling of native plants and disturbance of sea lions protected by the MMPA.



**Pt. La Jolla:** Uncontrolled public access at Pt. La Jolla sea lion rookery destroys sandstone cliffs. Tourists bring suitcases and ride scooters while trying to approach resting sea lions.



Tourists trample sensitive coastal bluffs and native plants to approach resting sea lions.

