

Resolution No. C-2020-_____

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HALF MOON BAY, CALIFORNIA,
AUTHORIZING THE SUBMISSION OF THE FINAL DRAFT LOCAL COASTAL LAND USE PLAN TO THE
CALIFORNIA COASTAL COMMISSION FOR CERTIFICATION**

WHEREAS, the California Coastal Act of 1976 (Coastal Act) (Public Resources Code sections 30000 *et seq.*) provides that each local government lying, in whole or in part, within the coastal zone shall prepare a Local Coastal Program (LCP) for that portion of the coastal zone within its jurisdiction; and

WHEREAS, LCPs consist of a Land Use Plan (LUP) and Implementation Plan (IP); and

WHEREAS, an LCP becomes fully certified after the California Coastal Commission certifies conformity of the LUP and IP with the policies of the Coastal Act; and

WHEREAS, an LUP describes the planning area's land use and environmental conditions, identifies issues, and contains land use policies and maps that complement adopted city policies and satisfy the intent of the Coastal Act; and

WHEREAS, the City of Half Moon (City) lies entirely within the Coastal Zone and is therefore subject to the Coastal Act; and

WHEREAS, the City's current LUP was initially approved by the Coastal Commission in 1985, amended in 1993, and formally certified by the Coastal Commission in 1996; and

WHEREAS, as stated in the current LUP, the City's LUP "constitutes not only the Coastal Element of the City's General Plan, but also every other element of the City's General Plan with the exception of the Housing Element"; and

WHEREAS, since 1996, the state regulations governing general plans have changed, and the City has supplemented the policies in the LUP with additional, standalone General Plan elements, including its Housing Element, as well as Circulation, Noise, Safety, and Parks and Recreation; and

WHEREAS, in fall 2013, the City initiated a long-term, collaborative process to update the policies in its standalone General Plan elements and LCP to account for changed conditions and new community priorities; and

WHEREAS, the City Council appointed a thirteen-member General Plan Advisory Committee (GPAC) to assist with community outreach and the preparation of the updated General Plan and LUP policies; and

WHEREAS, the City published an Existing Conditions Report in summer 2014 to provide a baseline of existing conditions, trends, and opportunities in the City and to inform the development of the updated General Plan and LUP policies; and

WHEREAS, the First Public Review Draft LUP was released in April 2016; and

WHEREAS, the GPAC held eight community forums on the First Public Review Draft LUP between April 2016 and January 2017, and the City solicited written public comments on the First Public Review Draft LUP until February 14, 2017; and

WHEREAS, the Planning Commission revised the draft LUP in response to comments from the GPAC and the public; and

WHEREAS, the Second Public Review Draft LUP was released as individual draft chapters and appendices from October 2018 to June 2019; and

WHEREAS, the Planning Commission solicited, received, and reviewed public comments on the Second Public Review Draft LUP, and held six public study sessions on the Second Public Review Draft LUP between November 2018 and September 2019; and

WHEREAS, the City hosted over forty other listening sessions, public workshops, outreach meetings, and other public outreach events with the general public and interested groups between March 2014 and September 2019 regarding updates to the LUP; and

WHEREAS, the Planning Commission again revised the draft LUP in response to public comments in late 2019 and early 2020; and

WHEREAS, the Final Draft LUP was released on July 24, 2020; and

WHEREAS, the Final Draft LUP incorporates guidance and information from the Coastal Commission's Local Coastal Plan Update Guide, the 2014 Existing Conditions Report, the Guiding Principles established by the GPAC, the Sea Level Rise Vulnerability Assessment published by the City in April 2016, public outreach, and the GPAC's review; and

WHEREAS, the Planning Commission held two public study sessions on the Final Draft LUP on July 28, 2020, and August 11, 2020; and

WHEREAS, the Planning Commission scheduled and duly noticed a public hearing on the Final Draft LUP for August 25, 2020; and

WHEREAS, due to wildfires in the region on August 25, 2020, the Planning Commission continued this hearing to September 8, 2020 and

WHEREAS, on September 8, 2020, the Planning Commission held a public hearing to consider the Final Draft LUP, and recommended the City Council approve the Final Draft LUP, as modified by certain changes; and

WHEREAS, the City Council scheduled and duly noticed public hearings on the Final Draft LUP for September 29, 2020 and October 6, 2020; and

WHEREAS, due to the lack of a quorum and scheduling issues, the September 29, 2020, hearing was continued to September 30, 2020;

WHEREAS, on September 30, 2020, October 6, 2020 (having been continued from September 30, 2020), and October 20, 2020 (having been continued from October 6, 2020) the City Council held public hearings to consider the Final Draft LUP, as recommended by the Planning Commission and modified by additional changes proposed by staff and the public;

WHEREAS, the City Council found that the Final Draft LUP, as modified by the revisions presented in Exhibit A, complies with Coastal Act policies and requirements; and

WHEREAS, in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code section 21080.9), CEQA does not apply to activities and approvals by the City as necessary for the preparation and adoption of an LCP, including the City's approval of the LUP; and

WHEREAS, the City is developing amendments to the City's current IP in order to bring the IP into conformance with the updated LCLUP.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Half Moon Bay that the City's LCP is intended to be carried out in full conformity with the Coastal Act.

BE IT FURTHER RESOLVED that the City Council has reviewed, considered, and hereby approves the Final Draft LUP, which includes the Draft LUP recommended by the Planning Commission as well as the revisions presented in Exhibit A, for submittal to the California Coastal Commission for certification in accordance with the Coastal Act.

BE IT FURTHER RESOLVED that the City Council directs the City Manager to make such submittal.

BE IT FURTHER RESOLVED that the modified Final Draft LUP submitted for certification by this Resolution will require formal adoption after Coastal Commission certification. The modified Final Draft LUP will take effect only if certified by the Coastal Commission and then after subsequent action by the City Council in the event that Coastal Commission certification necessitates subsequent revisions.

I, the undersigned, hereby certify that the foregoing Resolution was duly passed and adopted on the 20th day of October, 2020 by the City Council of Half Moon Bay by the following vote:

AYES, Councilmembers:

NOES, Councilmembers:

ABSENT, Councilmembers:

ABSTAIN, Councilmembers:

ATTEST:

APPROVED:

Jessica Blair, City Clerk

Adam Eisen, Mayor

DRAFT

Recommended Revisions Addendum

Green identifies revisions included in the September 30, 2020 staff report

Yellow identifies revisions included in the September 30, 2020 memo to Council

Blue identifies revisions included in the October 6, 2020 staff report

Gray identifies revisions included in the October 20, 2020 staff report

Chapter 1. Introduction & Framework

1. Page 1-32, Environmentally Sensitive Habitat Areas paragraph:

While the goal of maintaining the natural beauty of the city is not a changed condition from the 1996 Land Use Plan, the continuous need to ensure resilient, properly functioning ecosystems has evolved the City's approach to habitat protection over the years. For the 2020 Land Use Plan update, tThe City prepared an extensive evaluation of natural resource areas, including wetlands, riparian areas, and other sensitive habitats. This effort produced the updated habitat maps in the Natural Resources chapter of the Land Use Plan. The updated maps replace the Water Resources Overlay Map from the 1996 Land Use Plan, which had only been revised once since certification. This research and mapping of changed environmental conditions significantly informed policy options for this Land Use Plan, particularly concerning undeveloped lands. These policies have a broader, ecosystem-based approach for considering habitat functionality and vulnerabilities, from a cumulative perspective, as they relate to existing and new development.

Chapter 2. Development

Bernardo Station

1. Figure 2-1: Revise Planning Commission draft for Bernardo Station land use designation from Residential – Low Density to Residential – Medium Density. The result is that the existing designation (Residential – Medium Density) will be brought forward.
2. Page 2-59, Residential Land Use Designations narrative:
Residential – Low Density. The Residential – Low Density land use designation is applied to two small areas of the city: the former Stoloski/Gonzalez PD area between the Miramar neighborhood and the Surf Beach/Dunes Beach PD, and a 14.5-acre parcel east of the Frenchmans Creek residential neighborhood portions of the Bernardo Station subdivision between Wavecrest Road and Redondo Beach Road on the west side of Highway 1. This designation generally supports larger single-family residences on larger lots.

Residential – Medium Density. Most of the city's established single-family residential neighborhoods are in the Residential – Medium Density land use designation and were established with traditional residential zoning. Neighborhoods in this land use designation include Miramar, Frenchmans Creek, Sea Haven, Casa del Mar, Grandview (including the undeveloped lots and the eastern portion of the adjacent City-owned Glen Cree parcel), Highland Park, Grand-Belleville, Alsace Loraine, and Arleta Park. These neighborhoods are primary single-family with additional uses including accessory dwelling units, childcare homes, and home occupations. This designation also supports the city's main duplex neighborhood in South Downtown, and portions of the Bernardo Station subdivision between Wavecrest Road and Redondo Beach Road on the west side of Highway 1.

Planned Developments

1. Page 2-6, San Mateo County General Plan discussion, first paragraph:
San Mateo County's General Plan is applicable to the unincorporated lands and communities throughout San Mateo County. It specifically integrates the County's certified Local Coastal Program for the portion of San Mateo County located within the coastal zone. Although the County's General Plan/Local Coastal Program does not impose regulations on the City of Half Moon Bay, it influences and is influenced by the City's planning efforts. The 280 acres of the Planning Area located outside of Half Moon Bay city limits are covered by San Mateo County's General Plan/Local Coastal Program, which establishes policies to guide County decision-makers in matters related to land use, development, and resource management. County lands included in the Planning Area are considered "Rural Lands" and are subject to the policies of the Rural Land Use chapter of the County's plan. Rural Land Use policies focus on the protection and enhancement of resources in order to preserve biodiversity, efficiently manage resources, protect scenic quality, provide recreational opportunities, protect public health and safety, minimize environmental damage from development, and promote local employment opportunities.
2. Page 2-10, Workforce Housing Overlay, last paragraph:
The Workforce Housing Overlay could enable development of approximately 300 housing units within the City Planning Area for local workers and their households who are typically in the extremely low, very low, and low income brackets.
3. Page 2-22, Policy 2-21. Lot Retirements. Require mitigation for the individual and cumulative impacts of development when a new residential lot is created through retirement of development potential on an existing and separate lot, pursuant to the following criteria:
 - a. At least the same number of lots shall be retired as are created;
 - b. The retired lot(s) shall be located within city limits and have potential for residential development, including lots with PD land use designations where residential development is a potentially permitted use;
 - c. Retirement of development potential may occur through recordation of a no-build restriction, an accepted offer to a land trust, or through an in-lieu fee to support such retirement; and
 - d. Deed restricted affordable housing shall be exempt from lot retirement requirements.
4. Page 2-35, Planning Approach for Substantially Undeveloped PDs, starting with second paragraph:
The approach to updating and establishing new policies for the PDs falls within the same framework as planning for the rest of the city. The over-arching strategy is to concentrate development within the Town Center, preserve ESHA and agricultural land uses, avoid hazards, facilitate coastal access and recreation, incorporate open space and infrastructure, provide appropriate locations for needed land uses at appropriate densities and intensities, and maintain consistency with the requirements of the Coastal Act.

Because of changing environmental conditions and regulatory setting, the LUP includes a stringent comprehensive planning approach and standards for PD areas. As part of the a two-step application process for master plans, the City will require a site comprehensive preliminary assessment of PD areas to establish critical site plan design principles that may be submitted prior to or concurrently with the master plan application. The intent of the preliminary assessment is

to support the master planning process, including to help ensure that any proposed master plan can comply with applicable LUP policies. The LUP addresses the following PD planning needs:

Natural Resources. In addition to the comprehensive requirements for habitat protection contained in Chapter 6. Natural Resources, PD policies require site studies to identify the presence of ESHA, potential ESHA, and required buffer areas. This assessment must consider any pre-development uses or actions that may have impacted habitat and must include a formal wetland delineation if applicable. The site assessment should then be used to inform master planning components, such as how different types of development can be accommodated within or near an ecosystem so as to improve its value and functionality, in conjunction with the specific habitat protection requirements of Chapter 6. Natural Resources. Habitat restoration and conservation are established as permitted uses in all substantially undeveloped PDs, including in advance of a certified master plan.

[...]

5. Page 2-38, **Policy 2-46. Comprehensive Master Planning.** The entire PD area shall be comprehensively planned as a unit by the City or by an individual landowner(s) with a master plan as follows:
 - a. Master plans may be established as specific plans (Government Code Section 65450) or precise plans as specified in policies for each PD as guided by the LUP's development vision for each individual PD.
 - b. City-approved master plans shall be certified by the California Coastal Commission as an amendment to this Land Use Plan, with the policies of Chapter 3 of the Coastal Act as the legal standard of review.
 - c. In the case of any PD where portions are in separate ownership, approval may be given for development of a single parcel or group of parcels, provided that the City has approved and the Coastal Commission has certified a master plan for the entire PD area as required by the provisions of this section.

6. Page 2-38, **Policy 2-47. Master Plan Preliminary Site Assessment.** Require a comprehensive site assessment of the entire PD area as an initial or concurrent submittal for master plans. The assessment shall determine the net site area as the basis for determining residential and non-residential buildout; consider the PD area in the context of the city as whole-LUP's development vision for each individual PD; present preliminary concepts for replatting if applicable; and identify methods for overall protection and enhancement of coastal resources. A preliminary assessment shall evaluate and identify (including as these topics are addressed in more detail in other LUP chapters):
 - a. *Natural Resources.* ESHA, required buffers, potential ESHA that may require future study, and identification of predevelopment that may have impacted or removed ESHA. If applicable, wetland delineation is a requirement for a complete application. In addition to required buffers, the assessment should consider what the ESHA needs to function properly (e.g. wildlife corridors, species diversity, habitat resiliency) as part of the plan for protection, as well the need to accommodate inland migration due to sea level rise or erosion.
 - b. *Agriculture...*

7. Page 2-40, **Policy 2-51. Uses Allowed Prior to Master Planning.** Existing and new uses allowed in advance of master plan certification for PD areas include:
 - a. Existing conforming and non-conforming uses;
 - b. Existing, new, and/or expanded agriculture and agriculture compatible uses consistent with the Rural Coastal land use designation including residential development consistent with the Workforce Housing Overlay land use designation, Chapter 4 requirements for agricultural accessory and supporting uses, and Chapter 6 requirements;
 - c. Habitat restoration and conservation projects;
 - d. Lateral and vertical coastal accessways;
 - e. Multi-use trails including the California Coastal Trail which may be located within the 300-foot setback from the blufftop edge;
 - f. Environmental hazard mitigation;
 - g. Ancillary facilities to support resource dependent uses and coastal access including small parking areas, restrooms, wildlife viewing facilities, and similar amenities; and
 - h. Accessory dwelling units with existing single-family homes consistent with State law.Uses shall be sited so as to anticipate and not preclude future development of the PD pursuant to the policies herein.

8. Page 2-41, **Policy 2-52. Maximum Planned Development Buildout.** Each master plan shall specify the maximum residential density and non-residential intensity of development permitted within the PD area based on the preliminary site assessment required by Policy 2-47. The allowable buildout will be reduced to meet the coastal resource protection requirements of the LCP and Coastal Act or if it is determined that coastal access will be substantially impaired; and if other infrastructure and services are inadequate or otherwise cannot be provided to support the proposed development.

9. Page 2-42, **Policy 2-58. Visual Resources.** In accordance with Chapter 9. Scenic and Visual Resources, substantially undeveloped PDs are designated visual resource areas and shall require a comprehensive analysis of existing visual resources, including but not limited to upland slopes, significant plant communities, and broad ocean views; methods for protecting and enhancing such resources; and assessment of any proposed impacts to such resources. Where broad ocean views are available across a substantially undeveloped PD, structures shall be sited and designed to preserve unobstructed public ocean views to the extent feasible through the following methods:
 - a. Clustering or distributing structures where necessary to provide greater view protection;
 - b. Limiting structures to a 15-foot height limit unless an increase in height would not obstruct public views to the ocean from the highway or would facilitate clustering of development so as to result in greater view protection;
 - c. Providing setbacks from scenic corridors including Highway 1, the California Coastal Trail, and scenic coastal access routes as specified in Chapter 9. Scenic and Visual Resources to ensure; and
 - d. Providing landscaping which, when mature, will not block public ocean views.Upon substantial buildout, a PD is no longer considered a visual resource area but is required to maintain visual resource protections with any new development or redevelopment in accordance with the approved master plan and applicable policies of this LCP.

10. Page 2-45, Nurserymen's Exchange PD:

Site Constraints. Nurserymen's Exchange is visible from the Highway 1 scenic corridor and provides views across the site to the upland slopes are significant. The easternmost portion of the site is above the 160-foot contour line, with areas above the 90-foot contour line characterized by slopes over 30 percent grade. This eastern portion of the PD is also within 100 feet of the Very High Fire Severity Zone. The potentially buildable portion of the PD is a relatively flat area at the foot of the steeply sloped lands to the east. The PD is traversed by Roosevelt Creek and several manmade drainage ditches. The northern-most ditch is the downstream end of a culvert system that channels water from a riparian stream that flows from the north under Alto Avenue, then crosses under the gravel road before daylighting. Riparian vegetation is present along the Highway 1 frontage and on both sides of the Roosevelt Creek watercourse.

Alto Avenue was constructed at a substandard width and may require improvements to effectively serve as a main access point and provide emergency vehicle access. This effort would need to be coordinated with San Mateo County as Alto Avenue is outside of the City's jurisdiction.

Development Vision. Low density residential development has been envisioned for this area for many decades. Smaller homes are strongly preferred to meet the City's identified need for more affordable housing inventory. Neighborhood serving commercial uses or services such as a convenience store or café and small-scale, community-oriented quasi-public uses such as a small childcare center are supported in so far as they can be demonstrated to reduce vehicle trips and/or vehicle miles traveled. Agricultural and agricultural-compatible land uses would also be fitting with the site's soil types and adjacent greenhouse uses.

Master planning should consider clustering residential development away from the higher intensity greenhouse uses to the south and avoiding new vehicular access points from Highway 1. Alto Avenue and the shared drive could provide access on two sides of the property below the 90-foot contour line. Development of this PD could present an opportunity to align the access drive with Roosevelt Boulevard and establish a controlled intersection as envisioned for the Town Boulevard, such as through a round-about. Circulation and coastal access and recreational provisions should consider connection to the Eastside Parallel Trail on Highway 1 and opportunities for future trail access to the upland hills. Green infrastructure improvements should consider the potential for upstream detention to avoid downstream impacts as well as potential opportunities for replacing gray infrastructure with green infrastructure improvements.

11. Page 2-47, Surf Beach/Dunes Beach PD:

Site Description. The Surf Beach/Dunes Beach area is a partially undeveloped area totaling about 48 acres, bisected by Young Avenue and bounded by Half Moon Bay State Beach on the west and south, Highway 1 on the east, and the Stoloski/Gonzalez subdivision and Miramar neighborhood on the north. As of 2020, land north of Young Avenue has been predominately in agricultural use, with some parcels from the old unimproved Surf Beach subdivision now conserved by land trusts as open space. The area south of Young Avenue is used primarily for agriculture and stabling and rental of horses and horseback riding. Frenchmans Creek riparian corridor and the Sweetwood Group Campsite are located south border the southern end of the PD. Young Avenue is the primary vehicular point of access for the Surf Beach/Dunes Beach PD and is a designated scenic coastal access route. The Dunes Beach section of Half Moon Bay State Beach is accessed via Young

Avenue. Because most of the PD area has been in agricultural use, very little coastal scrub or other habitat typically found in undeveloped areas west of Highway 1 are present.

Site Constraints. Site constraints for the Surf Beach/Dunes Beach PD include habitat considerations, land trust ownership, and presence of potential hazards, visual resources, and prime agricultural soils. Of note, the site is considered to have poor drainage which can be an indicator of wetland potential, although recent studies have not identified such wetlands. North of Young Avenue, land trust and public ownership account for nearly 2 acres and an additional approximately 2-acre area covering the northwest corner of the site is located in the potential tsunami inundation zone as mapped by the California Emergency Management Agency. South of Young Avenue is almost entirely mapped as containing prime agricultural soils.

Visual resource protection is a key consideration for this PD. The site is highly visible from the Highway 1 scenic corridor and contains a designated scenic coastal access route (Young Avenue). The site also provides broad ocean views from Highway 1, and expansive views of the upland slopes are available over the site as seen from the Coastal Trail and beach. Policies brought forward from the 1996 Land Use Plan establish height limits for such areas at 15 feet unless an increase in height would not obstruct public views to the ocean from the highway. Furthermore, the active agricultural operation has scenic and visual significance. A visual impact assessment will be an important factor in master planning this PD.

Lands with habitat value and environmental hazards surrounding the PD area may present additional site constraints to consider for master planning. These include the Frenchmans Creek riparian corridor to the south, which is designated ESHA as presented in Chapter 6. Natural Resources, presents risk of localized flooding, and contains a eucalyptus grove with high fuel load and a monarch butterfly overwintering site; State Parks land to the west, which contains potential CRLF and SFGS dispersal and foraging habitat and snowy plover nesting habitat; and Pullman Watercourse to the north of the Stoloski/Gonzalez subdivision, which supports potential CRLF and SFGS dispersal habitat and presents risk of localized flooding. Drainage conditions, as in the Venice Beach area, are considered poor. It is anticipated that stormwater management using green infrastructure measures will require a higher design storm performance standard to be effective in the Surf Beach/Dunes Beach PD.

12. Page 2-48, Surf Beach/Dunes Beach PD Development Vision, second paragraph:

North of Young Avenue, a new residential neighborhood could be compatible with the Miramar residential area to the north, and new public recreational area such as a neighborhood park could provide opportunities to both residents and visitors. Neighborhood design could preserve remaining agricultural operations or community garden space to take advantage of prime soils, emphasize walkability and otherwise be suitable for a multi-generational neighborhood with young families, seniors, and assorted other household groups of mixed income levels. Continued use of the area north of Young Avenue for agriculture or agriculture compatible uses is also supported.

13. Page 2-48, Surf Beach/Dunes Beach PD Development Vision, fourth paragraph:

The Surf Beach/Dunes Beach site presents numerous opportunities for improving multimodal coastal access. Considerations include a separated class 1 bicycle and pedestrian route parallel to

Young Avenue or along Knewing Avenue (a paper street bounding the north side of the PD), extension of the Naomi Patridge Trail on Highway 1, and an interconnected network within the PD to link any future residential and recreational uses with the Coastal Trail. To reduce potential traffic impacts from new development, other circulation improvements could include a roundabout at the intersection of Young Avenue and Highway 1. Within the PD, access to private development should be separate from Young Avenue to maintain this road as a primary coastal access route, such as with provision of a frontage road(s).

14. Page 2-49, Venice Beach PD:

Site Description. The Venice Beach area is a partially developed area totaling about 44 acres. It is bordered on the north by Frenchmans Creek and on the south by the Casa del Mar subdivision. Venice Boulevard, an unimproved road to Venice Beach, bisects the area and is the primary vehicular point of access to the PD. Venice Boulevard is also a designated scenic coastal access route that provides access to the Coastal Trail and the State Beach. A 5-acre area of undeveloped land in scattered ownership on both sides of Venice Boulevard with four of these lots developed with single-family homes. North of the subdivision, there are two parcels totaling almost 9 acres; most of this area is developed for use as commercial equestrian operations, providing stables, rentals, and trails connecting to the equestrian trail adjacent to the Coastal Trail and State Beach. South of the subdivision, three parcels totaling 14 acres are undeveloped although they may have been used in the past to raise hay or barley. The PD contains a significant amount of central coast scrub habitat and invasive pampas grass, as well as prime agricultural soils.

Site Constraints. Site constraints for the Venice Beach PD include habitat considerations, land trust ownership, and presence of hazards, visual resources, and prime agricultural soils. Past biological resource evaluation of the western and southern portions of the PD indicate that these areas may be especially important as part of a habitat corridor and are characterized by central coast scrub which has been less disturbed than in other portions of the PD. Several sightings of CRLF have occurred in this area as indicated in Figure 6-3. Drainage conditions, as in the Surf Beach/Dunes Beach area, are considered poor. It is anticipated that stormwater management using green infrastructure measures will require a higher design storm performance standard to be effective in the Venice Beach PD.

Also similar to the Surf Beach/Dunes Beach PD, the Venice Beach PD offers a bi-directional viewshed with broad ocean views across the site from the Highway 1 scenic corridor and expansive views of the upland slopes are available over the site as seen from the Coastal Trail and beach. In addition, Venice Boulevard is a designated scenic coastal access route. The 1996 Land Use Plan specified a 15-foot height limit for Venice Beach PD and other visual resource areas on the west side of Highway 1. This requirement is brought forward and allows for increased heights in cases where they would not obstruct public views to the ocean from the highway. Furthermore, the active agricultural compatible operation has scenic and visual significance. A visual impact assessment will be an important step in master planning this PD.

Lands with habitat value and environmental hazards surrounding the Venice Beach PD area may present additional site constraints to consider for master planning. These include the Frenchmans Creek riparian corridor to the north, which is designated ESHA as presented in Chapter 6. Natural Resources, presents risk of localized flooding, and contains a eucalyptus grove with high fuel load

and a monarch butterfly overwintering site; and State Parks land to the west, which contains potential CRLF and SFGS dispersal and foraging habitat and Western snowy plover nesting habitat.

15. Page 2-51, Carter Hill PD table:

Development (2020)	3 residential units; Coastside County Water District tanks
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16. Page 2-51, Carter Hill PD Site Description:

Site Description. The Carter Hill PD is bounded by the Pacific Ridge PD to the north, Half Moon Bay High School to the west, Highway 92 to the south, and the city limits to the east. This area consists of about 53 acres in seven parcels, including one ~~containing a water tank~~ owned by the Coastside County Water District containing water tanks and an access road to the Nunes Water Treatment Plant. As of 2020, two of the properties were developed with a home and outbuildings. Most of the site is very steep and is characterized by Monterey pine and eucalyptus forest.

17. Page 2-54, West of Railroad PD:

Site Constraints. Concurrently with the Land Use Plan update, the City completed detailed erosion studies of the City-owned and maintained Poplar Beach Blufftop Park area immediately west of the West of Railroad PD. The analysis considered existing on-going erosion conditions as well as the effects of sea level rise. The estimated location of the bluff edge in 2050 and 2100 was mapped for a “business as usual” condition as well as a mitigated approach wherein drainage and public access improvements are implemented. In the unmitigated case, the bluff face is projected to recede as much as 200 feet by 2100 which would bring it into the West of Railroad PD. The mitigated case is about half that, or 100 feet. In either case, it should be assumed that ~~much~~ less blufftop land will remain between the West of Railroad PD and the beach below over the course of the Land Use Plan horizon to 2040; even less blufftop will remain in one hundred years (representing the anticipated life of residential development). As these blufftops support a heavily used section of the Coastal Trail and a variety of sensitive animal and plant species, this projected loss is significant.

The entire West of Railroad PD is designated potential ESHA in the Land Use Plan as it likely ~~contains numerous wetland areas, and~~ contributes to the overall biological productivity of the area for numerous special status and unique species including dispersal and foraging habitat. Previous studies have identified numerous wetland areas within and surrounding the PD, and an A approximately 300-foot wide swath of Coastal Terrace Prairie habitat, designated as ESHA, is present along the blufftop edge immediately west of the PD. Any new development must provide minimum 100-foot buffers is required from this these habitat types, as established in Chapter 6. Natural Resources. Additional site constraints include approximately 5.5 acres of land under public or land trust ownership as of 2020, and significant scenic views across the site facing west from the Railroad Avenue public right-of-way towards the ocean and facing east from the Coastal Trail to the upland slopes.

18. Page 2-57 and 2-58, North Wavecrest PD Development Vision:

Development Vision. North Wavecrest PD is envisioned primarily for habitat conservation and restoration, hazard avoidance, public access and recreation, and lower-cost visitor serving uses as consistent with Coastal Act priorities. Low-impact camping, Coastal Trail connections, ecotourism, birding, small ancillary facilities, and other similar types of low impact outdoor recreational uses

would be supported. As in the case for the West of Railroad PD, public land acquisition is highly desired to achieve this vision. A transfer of development rights (TDR) program could also potentially help achieve this vision while providing for increased development potential in the Town Center.

Although not desirable, additional potential land uses in North Wavecrest include residential and visitor-serving commercial. Residential uses ~~could would ideally~~ be clustered near the Ocean Colony residential area for land use compatibility and accessibility from Redondo Beach Road, and ~~should would ideally~~ comprise smaller one-story structures to provide more affordable housing inventory and protect scenic quality. Visitor-serving commercial uses ~~could would ideally~~ be clustered near Wavecrest Road, which contains a Commercial – Visitor Serving land use node and compatible land uses, and ~~could would ideally~~ comprise uses supportive of a primary outdoor recreational use with a limited footprint such as a small café or convenience store. In any case, siting and design of potentially permitted uses should consider land use compatibility with surrounding land uses. As the 2020 Land Use Plan revises the boundaries of North Wavecrest such that it is in two non-contiguous portions (the northern portion accessed by Wavecrest Road and the southern portion accessed by Redondo Beach Road), it may be appropriate to allow separate and/or phased master plans, provided that each master plan considers an area no smaller than the size of the existing paper subdivisions, ensures that it is feasible to plan remaining areas in a coherent manner, includes all necessary habitat buffer zones and will not adversely impact ecosystem functions, provides meaningful open space area, and addresses coastal resource values and protections of the North Wavecrest PD as a whole. Policy 2-46. Comprehensive Master Planning would apply to each phase of the PD in the case that a phased master planning approach is pursued.

(new paragraph break) Re-planning and re-platting would be essential for a master plan or plans to protect and improve coastal access, to ensure continuous lateral access and protected recreational opportunities along the bluff edge, to reduce the potential impacts of new development, to restore damaged habitats and bluffs, and to protect watercourses. In any case, any permanent structures should ~~ideally~~ be located at least 400 feet from the bluff edge to allow hazard avoidance, coastal terrace prairie conservation, and safe, natural bluff retreat. Future erosion studies may indicate that greater setbacks are necessary to fully avoid the hazard of bluff retreat and allow for inland migration of coastal terrace prairie habitat.

Should master planning not proceed or redesignation be preferred, the North Wavecrest PD could be most appropriate for the Regional Public Recreation and/or Open Space for Conservation land use designation but could support small portions of Residential – Low Density and Commercial – Visitor Serving land use designations as described above.

19. Page 2-60, Workforce Housing Overlay discussion:

Workforce Housing Overlay. To support recreation, service, and agricultural workers essential to Half Moon Bay's Coastal Act priority and local priority land uses, the City established the Workforce Housing Overlay land use designation with the 2020 LUP update. Occupancy of the residential development permitted through the overlay would be limited to these workers and their households, subject to conditions in a use permit, deed restriction, or other mechanism designed to ensure the housing will be affordable to the specified workforce. Because most of the

intended workers are typically in the extremely low, very low and low income brackets, this housing will provide much needed affordable housing in the City Planning Area. Policies include further specifications for applying the overlay with the underlying land use designation. Underlying designations include Rural Coastal, Horticulture Business, Regional Public Recreation, and Public Facilities and Institutions. Workforce Housing Overlay units are Local Priority Uses under this LUP. Workforce Housing Overlay units that specifically support agriculture are considered Coastal Act Priority Uses. Policies for each underlying designation provides additional guidance regarding permitted density, occupancy requirements, and siting and design.

20. Page 2-66, **Policy 2-88. Rural Coastal Permitted Uses.** Permitted uses in the Rural Coastal land use designation include agriculture, agricultural compatible uses including recreational equestrian uses, public recreation, and habitat restoration, greenhouses, horse breeding, grazing, equestrian centers, farmworker housing as provided for by State law, ancillary uses necessary to support the primary use or operation, and supplemental uses to support the long-term viability of the primary use. Conditionally permitted uses include single-family residences at no more than one unit per 15 acres.

21. Page 2-71, **Policy 2-99. Open Space for Conservation Permitted Uses.** Permitted uses in the Open Space for Conservation land use designation include habitat conservation and restoration, necessary public safety activities, resource dependent uses including low-impact public access and recreation, ancillary uses such as a small ranger station, and one dwelling unit for natural resource management personnel caretaker per legal parcel with a minimum lot size of 100 acres. Permitted uses are not intended to supersede the provisions of any open space deed restrictions or conservation easements that may be associated with properties in this land use designation.

Chapter 3. Public Works

1. Page 3-7, Table 3-1: City of Half Moon Bay and Midcoast Buildout Summary. Update as follows:

	2018	2040 Projections	MTB
Dwelling Units			
Midcoast Total	9,21042	11,028	14,006
Half Moon Bay	4,83063	5,612	7,051
Unincorporated Midcoast	4,380	5,416	6,955
Population			
Midcoast Total	23,909	28,532	35,347
Half Moon Bay	12,565	14,535	18,262
Unincorporated Midcoast	11,344	14,027	17,085
Employment (Jobs)			
Midcoast Total	7,930885	11,04710,698	-----
Half Moon Bay	5,379	6,053	7,684
Unincorporated Midcoast	2,551	4,994	-----

2. Page 3-9, Figure 3-1 Water Service Providers:
 - a. Revise legend categories as follows: “Coastside County Water District Service Area” and “Not Available Additional Properties Served”.

- b. Revise the Johnston House parcel and the Skylawn Cemetery parcel to the gray “Additional Properties Served” category.
3. Page 3-14, Service Area Water Connections narrative, end of first paragraph:
As of 2020, about 1,230 remaining uninstalled water connections were held by CCWD or private landowners throughout the service area, including within the city limits and the unincorporated Midcoast, as summarized in Table 3-5. ~~The connections are not specifically assigned to Half Moon Bay or the unincorporated service area; rather, all eligible land uses within the service area may procure the appropriate type of connection to support potentially viable development.~~ The City accounts for approximately two-thirds of the water connections as of 2020.
4. Page 3-16, Table 3-5: Revise second column header as follows: ~~“2020 Connections Available Service Area Connections (2020)”~~
5. Page 3-19, New Water Connections narrative:
New Water Connections. ~~Over the planning horizon, it may be appropriate to establish additional water connections. To do this establish additional water connections,~~ CCWD would need to secure a coastal development permit through the City and/or San Mateo County ~~or an amendment to the 2003 El Granada Pipeline coastal development permit. Before doing so, the City and CCWD will need to monitor water demand of existing uses and frequently update near and long-term development forecasts to ensure that new connections will not result in over-allocation of actual water supply and will not enable development that would adversely impact other infrastructure systems.~~ Coastal development permits allowing increased infrastructure capacity must be carefully considered in relationship to the adequacy of other public works capacity. It is anticipated that other infrastructure systems, particularly circulation, will be significantly constrained so as to not support creation of additional water connections, especially for non-priority uses.

Coastal Act Priority Uses. For Coastal Act Priority Uses, the implication of running out of connections for the 2040 and MTB scenario is multifaceted. Land use and water supply policies address this anticipated shortage in the following ways:

- Coastal Act Priority Uses with Lower Water Demand: The LUP update considers land use from numerous perspectives. Chapter 2. Development identifies lower-cost visitor serving uses as sustainable options for cases where prime soils are present and such uses can be established with a light development footprint. Examples include ~~outdoor commercial recreation such as camping, agritourism, equestrian uses, and other~~ agricultural compatible uses (e.g. parks, commercial equestrian uses, and other outdoor recreation) and agriculture supplemental uses (e.g. farm stands, agritourism, small-scale farm lodging, and temporary and seasonal uses) geared to coastal visitors. With respect to Coastal Act Priority Uses...
6. Page 3-20, second paragraph after bullet: Delete and incorporate into page 3-19.
~~Over the planning horizon, it may be appropriate to establish additional Coastal Act Priority connections, which would require an amendment to CCWD’s 2003 El Granada Pipeline coastal development permit. Before doing so, the City and CCWD will need to monitor water demand of existing uses and frequently update near and long-term development forecasts to ensure that~~

~~new connections will not result in over-allocation of actual water supply and will not enable development that would adversely impact other infrastructure systems.~~

7. Page 3-29, Treatment Plant Vulnerability narrative, first paragraph:
Treatment Plant Vulnerability. The SAM plant location and condition are a long-term vulnerability for the Planning Area. The SAM treatment plant is located at a low elevation near the shoreline and is subject to both tsunami and dam failure inundation hazards.
8. Page 3-41, Other Public Works Facilities:
The City relies upon other public works facilities and systems that are not specifically addressed in the Coastal Act except where they would meet the definition of development. Some are mentioned below to provide context. Each of these systems are covered in other City planning policy documents.
9. Page 3-43, **Policy 3-9. Municipal Service Provisions.** Only provide municipal services including water, sewer, and roads to areas approved for development, except where services are required for permitted restoration, agricultural, agricultural compatible, and recreational uses. In the case of Planned Developments, prior to master plan approval, provide services only for those uses allowed in advance of master plan approval, or any other use specifically provided for in the Land Use Plan.
10. Page 3-43, **Policy 3-10. Timing for New or Expanded Public Works Facilities.** The timing and amount of new or expanded City public works facilities or capacities, as well as those provided by other agencies subject to City issuance of a coastal development permit, shall be prioritized for land uses as listed in Policy 3-3 and shall be determined by:
 - a. Considering the anticipated buildout within the urban boundary of the Planning Area and public works capacities as a whole;
 - b. Providing capacity incrementally to support a phased buildout of the land use plan;
 - c. Prioritizing sustainable infrastructure and development that is protective of the environment, conserves resources, and/or supports agriculture;
 - d. Anticipating the public works capacity for buildout of the Town Center;
 - e. Considering if existing capacity has been consumed or will be consumed within the time required to construct additional capacity;
 - f. Considering the availability of related public works to establish whether capacity increases would overburden the existing and probable future capacity of other public works;
 - g. Considering the availability of public funds for public works improvements that benefit existing development, with private funds required for improvements needed for new development; and
 - h. Considering San Mateo County's certified Local Coastal Program policies and subsequent buildout and infrastructure modeling prepared by the County for the Midcoast.
11. Page 3-45, **Policy 3-19. Water Connection Allocation Process for Proposed Development.** Consider working with San Mateo County and CCWD to review establish a process for allocating water connections needs for buildout of the service area for development proposals that includes temporary conditional reservations contingent on entitlement review, selling connections after

~~entitlements are granted, and expiring or otherwise returning connections to the district's inventory if the development does not proceed within an established period of time.~~

12. Page 3-48, **Policy 3-33. Roadway System to Meet Needs.** The transportation network shall be planned and designed to accommodate traffic due to the buildout of the LUP's envisioned uses and densities in scale with community character; shall support a wide range of user requirements and road types for visitors, residents, and for local industry including agriculture; and to the extent practical, growth beyond the city limits, including within the sphere of influence, and recreational, and regional through traffic.

Chapter 4. Agriculture

1. Page 4-9, Agriculture Preservation Strategies:

This LUP places a priority on protecting agricultural lands as well as supporting existing agricultural operations. Specific strategies for achieving these goals are discussed below. Beyond meeting Coastal Act requirements, protection of agricultural lands supports community priorities of maintaining Half Moon Bay's rural character, reducing carbon emissions, and enhancing food security.

2. Page 4-10 narrative about agricultural supplemental uses.

SUPPLEMENTAL USES

While the Rural Coastal designation allows open field agriculture, low-density single-family housing, farmworker housing, and other ancillary and compatible uses, agricultural operators indicate that there is a need for supplemental agricultural and non-agricultural uses within Rural Coastal to support the economic viability and longevity of agricultural operations. Such uses could include farm-to-table events, agritourism, and research and development facilities, and small-scale overnight accommodations may also be considered, provided that they are related to the underlying agricultural or agricultural compatible use and are generally soil conserving. bed-and-breakfast operations.

As discussed in Chapter 2. Development, farmworker housing is a Coastal Act Priority Use. To support this, the Workforce Housing Overlay is available to the Rural Coastal and Horticulture Business land use designations to provide opportunities for affordable farmworker housing. The LUP also aims to make it easier for farmers and horticulture businesses to maintain agricultural operations by allowing for greater flexibility of supplemental land uses that can provide additional economic opportunities for farmers and operators of other related agricultural businesses in ways that complement existing operations.

3. Page 4-12, **Policy 4-1. Agricultural Preservation.** Ensure the continued viability of agriculture within Half Moon Bay and the Planning Area. This shall include the following:
 - a. Protect existing agricultural operations and lands with prime and non-prime agricultural soils located outside of the Town Center, regardless of the underlying land use designation.
 - b. Accommodate the housing needs of farmworkers within the community;
 - c. Promote economic viability within Half Moon Bay by permitting agriculture compatible, supplemental, and ancillary uses that limit direct and cumulative impacts on the long-

term productivity of agricultural soils (e.g. minimize soil disturbance and protect soil structure); and

- d. Acknowledge potential land use compatibility challenges and allow flexibility for agricultural uses with regards to noise, dust, and other aspects of customary agriculture practices.

Chapter 5. Coastal Access and Recreation

1. Page 5-6, Primary Coastal Access Routes section:

Young Avenue and Venice Boulevard. These primary coastal access routes lead to beaches that are part of Half Moon Bay State Beach (Dunes Beach and Venice Beach), a unit of the State Parks system. The Sweetwood Group Camp is near the southern end of Dunes Venice Beach.

2. Page 5-17, Eastside Parallel Trail discussion:

Eastside Parallel Trail. The San Mateo County Comprehensive Bicycle and Pedestrian Plan (CBPP), adopted in 2011 by the City/County Association of Governments (C/CAG) of San Mateo County, identifies a "Parallel Trail" along Highway 1 as a key countywide corridor. The Parallel Trail would run adjacent to Highway 1, starting at Devils Slide and extend south to and through Half Moon Bay. The Naomi Patridge Trail has been functioning as Half Moon Bay's segment of the Parallel Trail. Today, the Naomi Patridge Trail provides a direct travel route for pedestrians and cyclists along much of the west side of the Highway 1 corridor in Half Moon Bay. Half Moon Bay's Bicycle and Pedestrian Master Plan brings the Eastside Parallel Trail planning forward for the Planning Area. Planned future segments of this trail will facilitate continuous nonmotorized travel on a separate path along the east side of adjacent to Highway 1, from Half Moon Bay's northern to southern city limits. At the time of the 2020 LUP update, a portion of the trail had received grant funding and was undergoing environmental review. Because the Eastside Parallel Trail will provide a more direct route through town than the California Coastal Trail, commuters are likely to use it more often, which could free up some capacity on the Coastal Trail. The use of motorized bikes, scooters and similar modes may be more appropriate on this facility dependent upon the trail width and other design features and should be subject of future study to ensure use of this new amenity is optimized and complimentary to other facilities.

3. Page 5-18, Planned Trails section, new paragraph to acknowledge the Bay to Sea Trail:

Bay to Sea Trail. The planned Bay to Sea Trail is a multi-jurisdictional effort to provide regional connectivity between urban and open space areas from the bayside to the coastside. For Half Moon Bay, the trail is planned to connect to the Coastal Trail via the City's existing and planned bicycle and pedestrian network. At the time of the 2020 LUP update, exact alignments and timeline for implementation were unknown.

4. Page 5-31, first full paragraph:

California State Parks and Beaches owns and manages most of this land at Half Moon Bay State Park and Beach, with smaller amounts managed by the City and County at Poplar Beach and Surfer's Beach.

5. Page 5-40. **Policy 5-71. Inclusion of Lower-Cost Accommodations.** Require new development of higher cost accommodations and/or new development that would fail to provide lower cost accommodations on land where that use is allowed and suitable to provide lower cost

accommodations (e.g. a lower-cost bank of rooms in a hotel, a hostel, campground, cabins, etc.). The lower-cost accommodations may be provided, as listed in order of priority as follows: on-site, off-site, or through payment of an in-lieu fee fund to support establishment of new lower-cost accommodations in the coastal zone. The provision of lower-cost accommodations shall equate to 15 to 25 percent of the number of approved high cost accommodations in consideration of the price range of the proposed lodging options and provision by the development of other low-cost public access and recreation benefits such as airport shuttles, bicycle rentals, or trail connections. Require full replacement of any existing low-cost rooms proposed for conversion to high-cost rooms.

6. Page 5-41, **Policy 5-77. Equestrian Facilities.** Where Limit equestrian uses and facilities are a permitted use west of Highway 1, ensure that new facilities will not conflict with other public recreation uses and will not have adverse environmental impacts; to the level generally available as of the time of the LUP update and require that existing equestrian facilities and activities improve practices to prevent and remediate adverse environmental impacts to creeks and other ESHAs as necessary. Encourage relocation of equestrian facilities inland and/or upland. New facilities east of Highway 1 should be sited in consideration of potential linkages to are preferred, where future City trails could link to the or San Mateo County trail systems, and especially in locations where other equestrian-oriented events and programs can be accommodated. New facilities shall not be established on the coastal terrace unless such use will not conflict with other public recreation uses and has no adverse environmental impacts.

Chapter 6. Natural Resources

1. Figure 6-3, Special Status Species ESHAs and Figure 6-4, ESHA Summary Map: Remove Smith Field from the Potential ESHA category.
2. Page 6-6, Central Dune Scrub habitat description:
Central Dune Scrub occurs in areas of sand accumulation, generally forming a dense coastal scrub community of shrubs, subshrubs, and herbs. Typical species in this habitat include Coastal sagewort (*Artemisia pycnocephala*), dune Yellow Bush lupine (*Lupinus arboreus chamissonis*), lizard tail (*Eriophyllum staechadifolium*), coyote brush (*Baccharis pilularis ssp. pilularis*), and California goldenbrush (*Ericameria ericoides*). Dune habitat, including degraded dunes, are mapped in Figure 6-1 to include the Central Dune Scrub vegetative community and foredunes free of vegetation to the base of the slope based on topographic information. This dune system in Half Moon Bay supports the federally listed Western Snowy Plover.
3. Page 6-6, Non-Native Grassland habitat description:
Non-native grasslands are composed of annual grasses with annual and perennial numerous species of annual forbs, especially in years of favorable rainfall. This community provides foraging habitat for a variety of wildlife species, including raptors and small mammals, and provides nesting sites for birds. Grassland may provide upland habitat for California red-legged frog.
4. Page 6-7 (and elsewhere as applicable): Update scientific name for Monterey cypress to *Hesperocyparis macrocarpa*.

5. Page 6-35, **Policy 6-8. Biological Study.** For development proposed in and adjacent to ESHA and projects for which the preliminary biological inventory indicates the presence or potential for sensitive species or habitat, require the preparation of a detailed biological study by a City-approved, qualified professional to be submitted prior to development review and prior to any ground disturbance. The report shall assess site conditions typically within 200 feet of the proposed development; identify if site conditions meet the LCP's definition of ESHA; determine if significant direct or cumulative impacts to the ESHA, to the special status species supported by the ESHA, or to on- or off-site biological productivity and ecosystem functionality may occur from the proposed development; and recommend the most feasible avoidance and/or mitigation measures if impacts may occur. At minimum, the study shall also provide and discuss the following if ESHA is present and if applicable to site conditions:
- a. For animals and avian species: Requirements for food, water, nesting or denning sites and requirements for reproduction, predation, dispersal, refugia, and migration;
 - b. For plants: Life histories, and requirements for soils, climate, and geography;
 - c. A map depicting the locations of plants or animals and/or their habitats;
 - d. Recorded observations of special status species from reputable databases such as the California Natural Diversity Database;
 - e. Site topography, drainage patterns, soil permeability, and depth to water table;
 - f. Unique site conditions, such as vegetation, natural topography, or built features (e.g. roads, structures) that provide a physical barrier between the proposed development and the ESHA;
 - g. The likelihood of increased human activity and disturbance resulting from the project relative to existing development;
 - h. An evaluation by a qualified professional of the ESHA's vulnerability to sea level rise impacts (e.g. sensitivity to inundation and seawater intrusion) and ability for adaptation (e.g. inland migration) for projects located within 300 feet of the beach or bluff edge, or where otherwise appropriate based on based available science for inundation projections;
 - i. A recommendation of the need to conduct a wetland delineation if site conditions indicate the presence or potential for wetland species or indicators;
 - j. Recommended avoidance and/or mitigation measures if the proposed development has potential to impact any on- or off-site sensitive habitat areas or special status species during or post-construction; and
 - k. Recommended buffer widths based on the applicable buffer policies in this chapter, site-specific conditions, and sensitivity and resilience of the ESHA to disturbance from the proposed development and from anticipated sea level rise impacts, where applicable. Where a reduced buffer zone is proposed, a recommendation of whether the reduced buffer zone would provide equivalent protection of the biological integrity of the site's sensitive habitats and special status species given the site-specific characteristics of the resource(s) and of the type and intensity of proposed development.
- Studies shall be made public and subject to review and comments by jurisdictional agencies and the public concurrently.
6. Page 6-42, **Policy 6-41. Wetland Buffer Zones.** Wetland buffer zones for proposed development shall extend a minimum of 100 feet landward from the edge of the delineated wetland. A larger buffer may be required based on site-specific evidence that a larger buffer is necessary to protect

the functional capacity of the wetland ecosystem or to protect any sensitive species from the impacts of proposed development. A wetland buffer may be reduced to less than 100 feet only where the following can be demonstrated through evidence provided by site-specific evaluation pursuant to Policy 6-8, and only as specified below:

- a. Where the only building site is located entirely within the required buffer; no alternative development site, size, or design is feasible; and the proposed development is compatible with the continued viability of the adjacent wetland, including protection of any sensitive species: the buffer may be reduced to no less than 20 feet provided that design alternatives that maximize the buffer width are utilized; or
 - b. Where the only building site is not located entirely within the required buffer; no alternative development site, size, or design is feasible to accommodate the development entirely outside the required buffer; no new adverse impacts to the wetland will occur; and the reduced buffer would provide equivalent protection of wetland resources, as conclusively demonstrated by a professional biologist to the satisfaction of the City and all jurisdictional regulatory agencies: the buffer may be reduced to no less than 50 feet.
7. Page 2-46, **Policy 6-50. Riparian Corridor Buffer Adjustments.** A larger riparian corridor buffer may be required based on site-specific evidence that a larger buffer is necessary to maintain and protect the biological integrity of the riparian habitat and functional capacity of the watercourse or to protect any sensitive species from the impacts of proposed development. A riparian buffer may be reduced below what is required by Policy 6-49 only where the following can be demonstrated through evidence provided by site-specific evaluation pursuant to Policy 6-8, and only as specified below:
- a. Where the only building site is located entirely within the required buffer; no alternative development site, size, or design is feasible; and the proposed development is compatible with the continued viability of the riparian corridor, including protection of any sensitive species: the buffer may be reduced for all riparian corridors to no less than 20 feet from the outer limit of riparian vegetation or from top of bank, whichever is greater, provided that design alternatives that maximize the buffer width are utilized; or
 - b. Where the only building site is not located entirely within the required buffer; no alternative development site, size, or design is feasible to accommodate the development entirely outside of the required buffer; no new adverse impacts to the riparian corridor will occur; and the reduced buffer would provide equivalent protection of the biological integrity of the riparian corridor given the site-specific characteristics of the resource and of the type and intensity of disturbance, as conclusively demonstrated by a qualified biologist to the satisfaction of the City and all jurisdictional regulatory agencies:
 - i. The buffer may be reduced to no less than 35 feet from the outer limit of riparian vegetation or 50 feet from the top of bank, whichever is greater, for development proposed adjacent to perennial and intermittent watercourses pursuant to Policy 6-49(a); or
 - ii. The buffer may be reduced to no less than 25 feet from the outer limits of riparian vegetation or from the top of bank, whichever is greater, for development proposed adjacent to all other intermittent and ephemeral watercourses pursuant to Policy 6-49(b).

8. Page 6-47, **Policy 6-53. Non-Riparian Watercourse Buffers.** Where a watercourse lacks riparian vegetation, the boundary of the watercourse is defined by the top of bank or similar confining topography. Proposed development along a non-riparian watercourse lacking riparian vegetation or other sensitive habitat value as determined by a site-specific study, including man-made drainage ditches (e.g. non-riparian portions of Pullman Watercourse) but excluding active agriculture irrigation ditches, shall provide a minimum 20-foot buffer from the top of bank to provide space for potential meander belts and natural erosion and flooding hazards. The buffer requirements in Policies 6-49 and 6-50 shall apply to proposed development along a watercourse where a site-specific study identifies riparian vegetation or other sensitive habitat value.
9. Page 6-61, **Policy 6-77. Hydrology and Water Quality Restoration.** Encourage and implement opportunities to restore wetlands, riparian corridors, and other habitats that provide stormwater retention and storage, carbon sequestration, remediation for degraded water quality, and groundwater recharge. Support and prioritize such restoration projects that provide multiple benefits to coastal resources and improve ecosystem functionality and resiliency.

Chapter 7. Environmental Hazards

1. Page 7-2, first full paragraph:
New development in the coastal zone must assure stability and structural integrity and not cumulatively create or contribute significantly to erosion, geologic instability, or destruction of the site or other affected areas. Thus, the Coastal Act does not permit new development that would require shoreline protective devices that would substantially alter natural landforms along bluffs and cliffs (Section 30253). Hard shoreline protection is permitted when required to serve coastal-dependent uses or to protect Coastal Act existing structures and public beaches from erosion. However, such allowable hard protection must be designed to eliminate or mitigate impacts on the local shoreline sand supply (Section 30235).
2. Page 7-3, “Existing structures” definition: Delete in its entirety.
“Existing structures,” with respect to Coastal Act Section 30235, means structures in existence prior to adoption of the Coastal Act (i.e. development legally authorized and built prior to January 1, 1977) that have not been redeveloped since after adoption of the Coastal Act (California Coastal Commission 2015 Sea Level Rise Policy Guidance). In the context of Coastal Act Section 30235, this chapter refers to “existing structures” as “Coastal Act existing structures” in order to distinguish this term from its more common usage.
3. Page 7-17, Blufftop and Beachfront Development section, second paragraph:
“Blufftop and beachfront development” is defined as development within 300 feet landward of a bluff line or edge or 300 feet landward from the inland extent of the beach, pursuant to California Code of Regulations Section 13577(g) and (h). Typically, policies for beachfront development and beach setbacks apply where there are sand dunes or other low-lying areas rather than coastal bluffs. “Anticipated life span” is defined as the period over which a development is expected to be usable, with normal repairs and maintenance, for the purpose for which it was designed, and The anticipated life span may range from a minimum of 100 years for residential and commercial development to approximately 150 years for critical infrastructure. Certain types of development and public access facilities such as trails that are sited and designed in a manner to facilitate relocation may have a lesser anticipated life span. The anticipated life span is not an entitlement

to maintain development for that amount of time, particularly where hazards or public safety risks are present, but rather is a planning tool for sea level rise adaptation, structure siting, and permitting purposes. The actual life of the development is dictated by on-the-ground conditions in the future, and any conditions of approval for the development. Policies require that new blufftop and beachfront development address the potential for flooding, erosion, and other sea level rise impacts over time.

4. Page 7-18, Shoreline Protection narrative, first paragraph:
Several policies cover the topic of shoreline protection, which is known to have negative impacts on coastal processes in the long-term. Hard shoreline protection devices alter natural shoreline processes by preventing natural bluff retreat and reducing sources of sand supply. As a result, these devices can cause loss of beach area which may be accelerated by sea level rise. Policies limit the construction of new hard shoreline protection to only that which is required to protect existing structures established before Coastal Act adoption, and critical facilities in danger from erosion, and require the use of soft protection where feasible as a preferred alternative to hard protection when protection is needed.
5. Page 7-21, **Policy 7-21. Repair and Retrofit of Coastal Act Existing Structures.** When it is necessary to repair damage to or retrofit Coastal Act existing structures, require materials and improvements that will better withstand shoreline hazard impacts, such as stronger materials, elevated bridges or sections of roadways, and larger or additional drainage systems to address flooding and erosion sedimentation concerns. Such repair, maintenance, and additions shall protect visual resources and other coastal resources while minimizing hazards.
6. Page 7-22, **Policy 7-25. State Parks Facilities.** Require maintenance and improvement projects at State Parks facilities such as beach parking lots, the Francis Beach Campground, Coastal Trail segments, State Parks Beach corporation yard, and State Parks workforce housing to plan and adapt for long-term shoreline hazard impacts as exacerbated by sea level rise, including retrofitting or inland relocation to maintain public access and recreation opportunities. Hard shoreline armoring may be permitted to protect coastal dependent State Parks facilities from shoreline hazards only when no feasible alternative exists, when consistent with Coastal Act Sections 30235 and 30253, and when necessary to provide continued public access. When necessary to provide continued public access or to protect coastal-dependent State Parks facilities from shoreline hazards, shoreline protection may be permitted only if consistent with Coastal Act Sections 30235 and 30253 and if no feasible alternative exists.
7. Page 7-23, **Policy 7-28. Shoreline Protective Device Limitations.** Unless otherwise provided for in Policy 7-29. Protection for Critical Facilities or Policy 7-40. Property Protection Plans, shoreline protective devices shall be permitted only in the following situations: to serve a coastal-dependent use or to protect an Coastal Act existing structure in imminent danger from erosion (i.e., when substantial evidence indicates that the structure will be significantly damaged by coastal flooding or erosion hazards within two to three storm cycles, or approximately three years); when found to be the least environmentally damaging feasible alternative (e.g., if relocation or soft armoring approaches cannot mitigate the hazard); and when all coastal resource impacts are appropriately and proportionally mitigated Shoreline protective devices shall not be

permitted as a means to protect non-coastal dependent development built or redeveloped after January 1, 1977 according to substantial evidence.

8. Page 7-24, **Policy 7-31. Shoreline Protective Device Siting and Design.** Allowable shoreline protective devices shall be sited and designed to avoid impacts to coastal resources to the maximum extent feasible, including through preserving the maximum amount of existing beach, protecting lateral public access along the shoreline, protecting and enhancing public views, minimizing alteration of and visually blending with the surrounding natural shoreline; avoiding impacts to archaeological resources; and not encompassing an area larger than that necessary to protect the coastal-dependent use, or Coastal Act existing structure, or critical facility.
9. Page 7-26, **Policy 7-40. ~~Managed Retreat~~ Property Protection Plans.**

Require non-coastal dependent development built or redeveloped after enactment of the Coastal Act that is subject to wave action, erosion, or other shoreline hazards to be removed or relocated if it becomes threatened (i.e. generally unsafe for use or occupancy within two to three storm cycles or approximately three years) in the future by such hazards or poses a threat to the public or environment, including as may be exacerbated by sea level rise.

In association with a coastal development permit approval, the City shall require owners of any property with a principle structure, such as a primary residence, closer than 100 feet to the blufftop edge, or located in an area subject to potential risk of shoreline hazards during the anticipated life span of the structure, to develop a property protection plan and submit it to the City for review and approval. In addition, at any time a landowner may voluntarily submit a property protection plan to the City for review and approval. The property protection plan shall:

- a. Provide an estimate of when the structure may be permanently unsafe for occupancy due to wave action, bluff failure, or erosion, including as may be exacerbated by sea level rise;
- b. Identify measures that could make the structures suitable for habitation without the use of bluff or shoreline protective devices, including necessary steps and thresholds for how and when to retrofit, remove or relocate the structure before it becomes permanently unsafe for use or occupancy or otherwise poses a threat to public safety; and
- c. Be recorded against the property once it has been approved by the City.

In the event that the approved plan identifies there is no feasible alternative that could make the structure(s) suitable for habitation while the approved plan is being implemented, a shoreline protective device may be allowed if the shoreline protective device is only in place for the time needed to retrofit, remove or relocate the structure pursuant to the approved plan and if all coastal resources impacts are appropriately and proportionally mitigated and the site is fully restored upon removal of the protective device.

10. Page 7-37, **Policy 7-49. Landslide Remediation and Stabilization.** Permit the remediation or stabilization of landslides that affect Coastal Act existing structures or that threaten public health or safety except along coastal bluff or other eroding edges, such as streambanks. Permit remediation or stabilization to the extent necessary where an existing landslide prevents development of private property and remediation does not shift risk to other property, and the remediation project includes mitigation monitoring and reporting. Alternative remediation or stabilization techniques shall be analyzed to determine the least environmentally damaging

alternative. Maximum feasible mitigation shall be incorporated into the project in order to minimize adverse impacts to resources.

Chapter 9. Scenic and Visual Resources

1. Page 9-23, **Policy 9-16. Broad Ocean Views.** Ensure that areas providing broad, public ocean views, including as designated on Figure 9-1, are preserved and enhanced in association with new development projects. In such areas, structures shall be sited and designed to avoid obstruction of broad, public ocean views, shall not exceed 15 feet in height unless an increase in height would not obstruct public views to the ocean or would facilitate clustering of development so as to result in greater view protection, and shall ensure that any proposed landscaping, when mature, will not obstruct public views to the ocean.

2. Page 9-25, **Policy 9-33. Lighting Inspection.** Where new lighting associated with residential or commercial developments will face the public right-of-way, ESHA, ESHA buffer areas, or agricultural operations, require design review during the construction phase to ensure compliance with any the required lighting criteria.

Appendix B. Buildout and Public Works Capacity

1. Page B-6, revise Footnote 26 as follows:
Most Farmworker housing units provided through the Workforce Housing Overlay housing units associated with Coastal Act Priority Uses will be farmworker housing. These units qualify as both Coastal Act Priority Uses and Local Priority Uses.

2. Page B-7, revise Footnote 29 as follows:
Most Farmworker housing units provided through the Workforce Housing Overlay housing units associated with Coastal Act Priority Uses will be farmworker housing. These units qualify as both Coastal Act Priority Uses and Local Priority Uses.

Appendix C. Special Status Species Summary Tables

1. Page C-2, Tidewater Goby entry:

<p><u>Northern</u> Tidewater Goby (Eucyclogobius newberryi)</p>	<p>FE/CSC</p>	<p>Found in brackish water habitats along the California coast from San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches. Needs fairly still but not stagnant water and high oxygen levels.</p>	<p>Potential habitat may occur during portions of the year when tidal lagoons form at the mouth of Pilarcitos Creek, but the species has never been documented in the Planning Area. Nearest record is from <u>San Gregorio Tunitas</u> Creek in <u>1996-2015</u>.</p>
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Glossary

1. Existing Structures: Delete definition in its entirety.