

**CALIFORNIA COASTAL COMMISSION**

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# Th10b

**Prepared May 7, 2024 for May 9, 2024 Hearing**

**To:** Commissioners and Interested Persons  
**From:** Stephanie Rexing, North Central Coast District Manager  
Isobel Cooper, North Central Coast Coastal Planner  
**Subject:** **STAFF REPORT ADDENDUM for Th10b, Appeal Number A-2-HMB-24-0008 (Wavecrest Public Access Improvements)**

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In the time since the staff report for this item was published on April 19, 2024, it was brought to staff's attention that the public access and recreation amenities included in the proposed project were identified in the staff report as Americans with Disabilities Act (ADA) compliant, when they are actually Architectural Barriers Act (ABA) compliant, where ABA guidelines are issued by the United States Access Board for accessibility related to outdoor recreational areas. The purpose of this addendum is to correct the accessibility standard identified in the staff report. Please note that this addendum does not modify the base staff recommendation, which continues to be that the appeals raise no substantial issue.

Thus, the following changes are made to the first full paragraph on page 12 of the staff report dated April 19, 2024 (text in underline format denotes text that would be added, and text shown in ~~strikeout~~ format denotes text that would be deleted compared to the original text):

The Appellants also raise concerns over the perceived loss of safe and equitable access opportunities. First, the Appellants assert that the existing informal lot acts as a vista point which is easily accessible to those with mobility issues. The two new lots are located approximately a quarter mile inland of the existing informal lot and would require visitors to walk a greater distance along the gravel trails to reach the beach access points and blufftop vista points, which the Appellants believe impedes use by those with mobility issues. While the location of the existing informal lot does offer scenic views of the ocean and coastline, the lot itself is unmaintained and located right at the edge of the bluff where it is subject to coastal hazards. There is currently no formal vertical beach access and visitors regularly scramble down the bluff face to access the beach, which poses a safety hazard and a barrier to visitors who are not physically able to descend the informal paths, and also leads to bluff degradation. Similarly, the existing informal trails are in poor condition, with many eroded areas and standing water, and are not appropriate for year-round access,

nor are they suitable for use by those with mobility issues. The Applicant contends the new formalized California Coastal Trail segment meets Architectural Barriers Act (ABA) accessibility standards for outdoor recreational areas,<sup>6</sup> and the trail's 8-foot-wide compacted rock design provides a safer and more durable surface for use by visitors with mobility issues. The viewpoints, trailhead parking areas, restrooms and signage included as part of the project also meet the applicable ABA accessibility standards. ~~would include ADA accessibility across most of the project area, and~~ The two stairways (both north and south of the Wavecrest Arroyo) provide a much safer and accessible option to reach the beach as compared to existing conditions. Overall, the access and recreation opportunities provided as part of the approved project would provide access to a broader range of visitors (e.g., families, wheelchair users, etc.) than would be accessible in current conditions, thereby enhancing public recreational access opportunities, minimizing barriers to such opportunities, and appropriately addressing current bluff-area environmental degradation. Therefore, the above appeal contentions do not raise a substantial issue.

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<sup>6</sup> ABA accessibility standards apply to facilities designed, built, or altered with federal funds or leased by federal agencies, while Americans with Disabilities Act (ADA) accessibility standards apply to facilities in the private and local/state government (i.e. non-federal) sectors. The current ABA standards and ADA standards are very similar, however ABA standards address outdoor developed areas (including trails, picnic, camping areas, and beach access routes) while ADA standards do not. While the proposed project is not supported by federal funds, the ABA standards for outdoor developed areas are used as guidance in the absence of ADA standards.