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STAFF REPORT UPDATED POST-CERTIFICATION MAP

Map Update Number: MA-2025-002

Local Government: City of Pacifica

Map Update Description: Updated post LCP certification coastal permit and appeal jurisdictional map that depicts the geographic areas in the City of Pacifica and offshore where the Coastal Commission has coastal permit authority, where the City has delegated coastal permit authority, and where the City coastal permit decisions are appealable to the Coastal Commission.

Staff Recommendation: Map Approval

SUMMARY OF STAFF RECOMMENDATION

After a local government's local coastal program (LCP) is certified by the Commission, Commission staff prepares, what the Commission refers to, as post LCP certification coastal development permit (CDP) and appeal jurisdictional maps (often referred to as post certification or "Post Cert." maps). These Post Cert. maps delineate areas where the Commission retains CDP authority and where that authority has been delegated to the local government. In addition, the maps show the areas within the local government's delegated permitting area where their CDP decisions are appealable to the Commission on a geographic basis (i.e., based on proximity to wetlands, streams, bluffs, beaches, the mean high tide line, the first public road, and, in some cases tideland and public trust land areas where primary CDP jurisdiction has been transferred to the local government).

The City of Pacifica's LCP Land Use Plan (LUP) and Implementation Plan (IP) were originally approved by the Commission in 1980 and 1994, respectively, with final LCP certification in 1994. Just prior to final LCP certification, the Commission adopted a

parcel-level Post Cert. map in 1993, and several changes have been made to the map since (both to address the City's Categorical Exclusion Order (E-94-1) as well as subsequent CDP jurisdiction boundary determinations in the City). Most recently, the Commission certified an updated LUP in May 2025, which prompted Commission mapping staff to pursue a map update, as is staff's general protocol for such LUP/IP updates.

The updated map presented herein reflects technological improvements made possible by the use of Geographic Information System (GIS) technology and incorporates standardized datasets (such as the National Hydrography Dataset for streams and the U.S. Fish and Wildlife Service's National Wetlands Inventory for wetlands). Importantly, the updated map does not modify the LCP or introduce any new regulatory standards, but rather simply illustrates areas that meet the geographic criteria established by the Coastal Act and its implementing regulations related to CDP and appeal jurisdictional boundaries. The updated map thus provides an LCP planning tool with greater transparency, consistency, and clarity regarding the geographic extent of CDP and appeals jurisdictions. Although the map provides a depiction of jurisdictional boundaries based on the best available information today, such boundaries are subject to change in the future as better information may become available and/or conditions on the ground change. Further, in all cases the map is merely illustrative, and on the ground conditions as they relate to the criteria set forth in the Coastal Act and its implementing regulations take precedence. A boundary determination or survey (e.g., of a wetland, stream, bluff edge, or beach line) may be necessary to establish the precise location of Commission CDP, City CDP, or appeal jurisdictions in any particular case.

The map update process involved collaboration between Commission staff and City staff to review the updated boundaries and ensure that the map accurately reflects the Coastal Act and its implementing regulation standards as they are applied to existing conditions on the ground to the greatest extent feasible. Special attention was given to the review and delineation of bluff and beach appeal areas, particularly given the degree of changes there due to erosion/hazards since it was last mapped, and to public trust areas, including filled former tideland areas. The use of modern mapping technologies, including high resolution aerial imagery, digital elevation models, and updated topographic data, supported a detailed review of these areas. This review leads to a fairly similar map as related to the current map, with the largest changes related to Commission CDP and appeal areas adjacent to Sharp Park Beach and along the Esplanade Avenue and Palmetto Avenue bluffs. Collaboration with City staff provided valuable local insight to verify shoreline conditions and confirm the accuracy of mapped boundaries. This data-driven and locally informed approach ensures that the updated map is technically rigorous, reflects current conditions, and remains fully consistent with the Coastal Act and its implementing regulations.

Staff recommends approval of the updated Post Cert. map, which will supersede and replace the previous map. The updated map, along with the accompanying GIS data, provides a more accessible and spatially accurate representation of Commission and City CDP and appeal jurisdictional boundaries in and offshore of the City of Pacifica. Certification of the updated map also allows the Commission to formally deliver jurisdictional GIS data to the City, enabling integration into the City's internal and public-

facing mapping platforms. This supports more efficient and accurate planning, permitting, and communication, helping to eliminate the need to rely on outdated paper maps that can be difficult to interpret, and which lack modern geographic precision. City of Pacifica staff reviewed the updated map and support the Commission's approval of it. The motion to approve the map is found on **page 5** below.

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EXHIBITS

[EXHIBIT 1 – Post LCP Certification Permit and Appeal Jurisdiction Index Map: City of Pacifica](#)

[EXHIBIT 2 – Draft Post LCP Certification Permit and Appeal Jurisdiction Map: City of Pacifica](#)

1. MOTION AND RESOLUTION

Staff recommends that the Commission adopt the updated City of Pacifica Post LCP Certification Permit and Appeal Jurisdiction map, and to do so Staff recommends a YES vote on the motion below. Passage of this motion will result in approval of the updated map and adoption of the resolution and findings below. The motion passes only by affirmative vote of a majority of the Commissioners present.

Motion: *I move that the Commission approve Map Adoption Number MA-2025-002 pursuant to the staff recommendation, and I recommend a yes vote.*

Resolution to Approve: *The Commission hereby approves Map Adoption Number MA-2025-002 and adopts the findings set forth below on grounds that the updated map depicts the areas where the Commission retains coastal development permit authority pursuant to Coastal Act Section 30519(b), and where appeals of City of Pacifica coastal development permit decisions are allowed pursuant to Coastal Act Sections 30603(a)(1) and (a)(2).*

2. FINDINGS AND DECLARATIONS

A. City LCP and Post Cert. Map Background¹

The City of Pacifica's LCP Land Use Plan (LUP) was originally approved in 1980, and the LCP Implementation Plan (IP) was certified with the City assuming CDP authority in 1994. After the Commission certifies a local government's LCP, CDP authority within that jurisdiction is mostly delegated to that local government. However, pursuant to Coastal Act Section 30519(b), the Commission still retains CDP authority after LCP certification over developments occurring on tidelands, submerged lands, and public trust lands (whether filled or unfilled) that are located within the coastal zone. In addition, Coastal Act Section 30603(a) and (b) define certain areas for which CDP actions by the local government may be appealed to the Commission. Geographic appeal jurisdiction, for example, applies to local government decisions on CDP applications for development located on lands within 100 feet of wetlands and streams; on lands subject to the public trust that are no longer within the Commission's retained jurisdiction, lands within 300 feet of coastal bluffs, beaches, or the mean high tide line (MHTL); and on lands between the sea and the first public road paralleling the sea (FPR).

Section 13576 of the Coastal Act's implementing regulations² require the preparation of Post LCP Certification Permit and Appeal Jurisdiction (Post Cert.) maps to depict areas where the Commission retains CDP authority, where local government has been delegated primary CDP authority, and where local government CDP approvals are appealable to the Commission. These maps are adopted by the Commission following LCP certification and may be updated from time to time to incorporate corrections, reflect changing conditions on the ground, integrate more accurate data, and the use of

¹ In all of the text that follows, referenced Coastal Act sections are shown in Appendix B, and referenced Code of Regulations sections are shown in Appendix C.

² Title 14, Section 5.5 of the California Code of Regulations (CCR).

more modern mapping technology. The Commission's implementing regulations recognize that while the adopted map is intended to illustrate jurisdictional boundaries as accurately as possible, it is ultimately a visual tool, not a definitive legal boundary. The map provides a general representation based on the best available data but at times may not reflect the exact location of permit or appeal jurisdiction. Instead, field verification may be necessary to confirm the actual boundary on a specific property and/or in relation to a specific proposed development. Because physical conditions on the ground, such as the location of streams, wetlands, or shoreline features such as bluff edges, can change over time, those real-world conditions are what ultimately determine jurisdiction. In some cases, if site conditions or our understanding of underlying supporting information has changed, it may be appropriate to revise the map to better reflect those changes.

During the late 1970's and early 1980's the Commission's Mapping program began a project to complete Post Cert. maps for all local governments within or partly within the coastal zone.³ The first effort consisted of producing a set of 161 maps using the USGS 7.5 minute quadrangle base (scale 1:24,000- or 1-inch equals 2000 feet), which was completed in 1981. The primary purpose of this project was to provide a consistent, statewide view of CDP and appeal boundaries for review by local government staff, Commission staff, and other interested parties. The area of the coastal zone within the City of Pacifica is covered by map sheets 60 and 61 of this original effort, the San Francisco South and Montara Mountain quadrangles. Following certification of the City's LCP and the distribution of sheets 60 and 61 from the set of 161 draft Post Cert. maps, a more detailed cadastral (parcel) scale Post Cert. map of the City of Pacifica was adopted by the Commission on November 17, 1993. Subsequently, that map was revised in 1995 to reflect a categorical exclusion order that had then been adopted,⁴ and in 1996 to reflect the results of a site-specific CDP boundary determination.⁵ These map revisions were not submitted to the Commission for certification when they were adopted.

B. Updated Post Cert. Map

The updated City of Pacifica Post Cert. map presented herein presents no significant

³ Although called out as Post Cert. maps, these early maps actually pre-dated certification of most all LCP's, and were instead intended to provide for the appropriate CDP and appeal framework once an LCP became to be certified.

⁴ On September 15, 1995, the Coastal Commission approved a categorical exclusion that excluding certain types of development in the City from CDP requirements (e.g., certain defined lot line and boundary adjustments, single-family residences, second units, grading, vegetation removal, temporary events, and public works; Categorical Exclusion Order E-94-1). The LCP Post Cert. map was revised to identify where the exclusion applied versus not, as well as to reflect the refined retained CDP jurisdiction boundary based on previous mapping of former tideland and potential public trust lands. The map revision was not submitted to the Commission for certification at that time.

⁵ Specifically Commission Boundary Determination 14-96 focused on the San Pedro Creek area, where review of available information at that time showed that there had been a mapping error related to the CDP and appeal jurisdiction boundary depicted on the LCP Post Cert. map for this area. Specifically, the then applicable Post Cert. map omitted a considerable area of the Commission's original jurisdiction based on potential public trust lands (former historical tidelands) associated with the historic floodplain of San Pedro Creek. The LCP Post Cert. map was revised to reflect the correct boundaries. The map revision was not submitted to the Commission for certification at that time.

areas of controversy affecting the map adoption. Coastal Commission staff have reviewed the Post Cert. map and associated jurisdictional boundaries with City staff. The Coastal Commission's retained CDP jurisdiction consists entirely of (1) lands seaward of the MHTL out to the State sovereign land 3-mile boundary, and (2) public trust lands and/or historic tidelands, whether filled or unfilled. The area of delegated primary CDP authority for the City is inland of that, and the area within that area where City CDP approvals are geographically appealable to the Commission are designated based on areas seaward of the first public road and the sea, and/or within 300 feet of the MHTL, 300 feet from the inland extent of the beach, 300 feet from the top of coastal bluffs, and 100 feet from the upland boundaries of wetlands and streams, whichever is most encompassing. The sections that follow describe different key aspects of the updated map.

C. Coastal Commission CDP Jurisdiction

Geographically, the Commission's retained CDP jurisdiction includes tidelands, submerged lands, and public trust lands including former tidelands.⁶ The primary sources for determining the Commission's continuing permit jurisdiction in the City of Pacifica are the contemporary U.S. Fish and Wildlife Service's (USFWS's) National Wetland Inventory (NWI) dataset covering this area; vertical and oblique coastal aerial photography; previous Post Cert. maps including the 1:24:000 scale map sheets 60 and 61 (the San Francisco South and Montara Mountain quadrangles); the map set showing potential public trust lands prepared for the Coastal Commission by the State Lands Commission staff in the late 1970's using, among other sources, tide and submerged land grant documents, and historical U.S. Coast Survey (now known as the National Geodetic Survey) topographic maps from the 1900's (between 1929 and 1957).⁷

These maps, photos, and other documents and information were analyzed to establish the public trust component, when that is the controlling CDP boundary criterion. Given the complexity involved in precisely mapping public trust boundaries, it is evident that the boundary delineating the Commission's retained CDP jurisdiction on the updated map may not include all areas subject to the public trust. Using the best available data and information sources, the updated map represents a good faith attempt to map tidelands and potential public trust lands to both natural and artificial features, such as bulkheads. This is with the understanding that CDP jurisdiction boundaries are an extrapolation of the best available data and may be subject to future interpretation and determination if warranted by site specific information. Furthermore, questions regarding

⁶ Tidelands, the first component of the Commission's retained permit jurisdiction, are lands lying between the lines of mean high tide and mean low tide. The MHTL is the landward tidelands boundary, an ambulatory boundary that moves with changes in the profile of the shoreline, particularly in sandy beach areas. The MHTL is and has been used by the U.S. Supreme Court, the California Supreme Court, federal and state courts, the state legislature, state regulatory and administrative agencies, and local governments as the boundary between public tidelands and private uplands. The location of the fluctuating MHTL is determined by establishing the intersection of the shore with the plane (elevation) of Mean High Water as calculated by the National Geodetic Survey for a particular location. Surveys can be performed to establish MHTL or tidelands locations. The State Lands Commission, as administrator of California's tidelands, can and does perform such surveys.

⁷ Often referred to as "T-Sheets". In this case, T-Sheets T-12606 (1963), T-04523 (1929), and T- 00395 (1853).

the exact location and extent of public trust lands may be referred to the State Lands Commission for determination. Both Commission staff and City staff recognize that should additional public trust lands be identified in the future, those lands would be part of the Commission's retained CDP jurisdiction, and the Post Cert. map would be revised to account for such changes as time permits.

Review of the above-referenced primary source materials indicates that the Commission's continuing CDP jurisdiction within the City of Pacifica exists only on lands lying below the MHTL, and/or on potential and/or historic public trust lands, whether filled or unfilled (see **Exhibit 2**). For the purposes of the updated Post Cert. map proposed for adoption by the Commission, the landward boundary of the Commission's retained CDP jurisdiction has been drawn to follow a combination of the tidelands, submerged lands and filled tidelands upon, in and under the Pacific Ocean; the inland extent of the active beach and marine and estuarine intertidal zones as mapped by the USFWS NWI, and contemporary high resolution aerial images of Pacifica's coastal zone.

D. Areas where City CDP Decisions are Appealable to the Commission

The area where City CDP approvals are appealable to the Coastal Commission within Pacifica is mapped according to the geographic criteria specified in Section 30603(a) of the Coastal Act and further defined in the Commission's regulations at CCR Section 13577. The appeal area is shown in **Exhibit 2**. The appeal jurisdiction boundary is based primarily on the FPR paralleling the sea, except where the designated road is situated closer than 300 feet inland from the inland extent of beach, MHTL, or top of the coastal bluff. In these locations the appeal jurisdiction boundary is 300 feet from the inland extent of the beach, 300 feet from the MHTL or 300 feet from the top of the coastal bluff face, as appropriate, rather than measured from the FPR. As with the CDP jurisdiction boundary, the appeal boundary can shift as on the ground conditions change, even though the regulatory basis of appeal remains consistent.⁸

Beach Appeal Areas

The Coastal Act specifies that any local government CDP approval for development that is located within 300 feet of the inland extent of any beach is appealable to the Coastal Commission (Section 30603(a)(1)), and the Act's implementing regulations define the inland extent of a beach as extending from the MHTL to the first line of terrestrial vegetation or to the toe of the bluff, whichever is most inland (CCR Section 13577(g)). These regulatory criteria provide the framework for delineating beach-based appeal jurisdiction following certification of the City's LCP.

Within the City of Pacifica coastal zone, beach appeal jurisdiction is most prominently associated with Sharp Park Beach, located along the central portion of the City's coastline between Clarendon Road and Paloma Avenue. This sandy beach fronts the oceanfront promenade along Beach Boulevard, and the Pacifica Pier recreational area.

⁸ The Commission's regulations also provide for appeal boundary revisions from time to time (see CCR Section 13576), where such revisions are intended to incorporate updates and changing conditions in the coastal zone environment upon which the boundaries are based and to make refinements reflecting the use of more accurate data and modern mapping technology.

The mapped beach appeal area extends landward from the inland extent of the beach up to 300 feet, encompassing the shoreline, public access areas, and developed parcels directly adjacent to the beach. This includes portions of the Beach Boulevard right-of-way and adjoining residential and recreational areas. While these areas are changing in the updated map versus the current map, it is important to note that the criteria in the regulations have not changed; rather, advances in mapping technology and the availability of high-resolution imagery and elevation data now allow staff to more accurately delineate the inland extent of the beach and apply the 300-foot appeal buffer with greater precision. As a result, the beach appeal area may appear to extend further inland in some locations compared to earlier maps. This reflects improved accuracy on the map, but it does not reflect any actual change in jurisdiction boundaries, as the boundaries have been set in the same way as defined by the Coastal Act and its implementing regulations. The map is illustrative, and intended to depict Coastal Act requirement and the criteria set forth in the regulations with improved technology and information, the illustrated precision is greater in some places now than in past maps.

Bluff Appeal Areas

The Coastal Act specifies that any local government CDP approval for development that is located within 300 feet of the edge of a coastal bluff is appealable to the Coastal Commission (Section 30603(a)(2)), and the Act's implementing regulations define the "coastal bluff line or edge" as the upper termination of a bluff, cliff, or seacliff (CCR Section 13577(h)). The regulation emphasizes that the location of the bluff edge is controlled by the physical landform characteristics, which are mapped using current topography, aerial imagery, and digital elevation data.

Within the City of Pacifica coastal zone, bluff appeal areas are mapped along the City's extensive bluff-backed shoreline, including the highly dynamic bluffs along Esplanade Avenue in the Fairmont West neighborhood, and Palmetto Avenue in the West Edgemar/Pacifica Manor neighborhood, both in northern Pacifica. These bluffs vary in height but are approximately 100+ feet in elevation at the farthest northern end of the City and decrease in elevation further downcoast towards West Sharp Park. The bluffs are generally composed of moderately cemented fine sand and poorly consolidated marine terrace material, and are subject to extreme wave forces, landslides, and erosion, among other coastal hazards. Additionally, a small area of lower bluffs to the south of the Viewpointe at Seaside (formerly Pacific Skies Estates) Mobile Home Park, along Shoreview Avenue, have experienced acute erosion. Accordingly, ongoing erosion and episodic bluff retreat have substantially altered the coastline compared to what is depicted on the current Post Cert. map. In these locations, the updated map reflects the current bluff edge derived from contemporary topography and aerial imagery, which in some areas extends the appeal jurisdiction further inland to account for bluff retreat.

Because bluff edges and their inland extent are defined by the physical landform rather than fixed coordinates, jurisdictional boundaries evolve with the landscape. The updated Post Cert. map reflects these on-the-ground conditions, incorporating the latest digital elevation models, and topographic and imagery data to capture the present bluff edge as required by CCR Section 13577(h). The criteria established in the regulations have not changed; rather, it is the coastline itself that has shifted over time. As a result, the

revised bluff appeal area accurately represents the current extent of the Commission's appeal jurisdiction related to bluffs consistent with the Coastal Act and its implementing regulations based on current data and understandings.

Stream Appeal Areas

The Coastal Act specifies that any local government CDP approval for development located within 100 feet of any stream is appealable to the Commission (Section 30603(a)(2)), and the Act's implementing regulations further specify the boundary determination criteria to be used in mapping stream appeal areas, including not only how to determine the appeal boundary location, but also which streams to identify and map. Specifically, CCR Section 13577(a) states that developments within 100 feet of the top of bank of any stream mapped by the USGS or identified in a city or county's LCP are appealable to the Commission. For purposes of mapping appeal jurisdiction, the Commission includes streams that are mapped by the U.S. Geological Survey (USGS) on 7.5 minutes quadrangle maps, identified in the certified LCP, and/or represented in the National Hydrography Dataset (NHD), including perennial, intermittent, and ephemeral streams. Ephemeral streams are stream types that carry surface water only during or immediately after rainfall events which are often included in the USGS NHD dataset. While these features may not exhibit year-round flow, they are still considered streams under Commission regulations when they meet the defined criteria.

Once a stream is identified, the 100-foot appeal buffer is measured from the top of the bank. In locations where a defined bank is not discernible, the buffer is measured from the stream line established and mapped by the USGS. Improved data like the NHD help the Commission to map existing streams and tidal channels which were not previously depicted on the USGS 7.5-minute quadrangle base maps. However, the underlying USGS stream mapping criteria pursuant to CCR Section 13577(a) have not changed, and developments located within 100 feet of a USGS mapped stream remain appealable to the Commission under existing regulations. Commission staff is not aware of any stream-based geographic appeal jurisdiction within the City's coastal zone.⁹

Wetland Appeal Areas

The Coastal Act specifies that any local government CDP approval for development located within 100 feet of a wetland is appealable to the Commission (Section 30603(a)(2)), and the Act's implementing regulations define the criteria for identifying wetlands and determining their boundaries (CCR Sections 13577(b)(1) and (2)).¹⁰ Specifically, CCR Section 13577(b) defines a wetland as land that is saturated or inundated long enough to support specific plant communities or soil characteristics, where a wetland boundary may be identified based on a single parameter: either the

⁹ Staff note that for streams located within the coastal zone of Pacifica, notably San Pedro Creek, the FPR is situated farther inland, such that the entire area surrounding the creek lies within the Coastal Commission's appeal jurisdiction based on the FPR. Staff also note that the map is merely illustrative, and on the ground conditions as they relate to the criteria set forth in the Coastal Act and its implementing regulations take precedence.

¹⁰ Note that CCR Section 13577(b)(2) excludes agricultural ponds and reservoirs from the definition of wetlands for the purposes of determining appeal jurisdiction.

presence of hydric vegetation, hydric soils, or evidence of regular or seasonal flooding during years of normal precipitation is enough to qualify an area as a wetland.

Updated digital Post Cert. maps incorporate standardized statewide datasets such as the USFWS National Wetland Inventory (NWI). This improved data helps the Commission map existing wetlands and tidal channels which were not previously depicted on the USGS 7.5-minute quadrangle base maps. As with other jurisdictional boundaries, actual jurisdiction is governed by the Coastal Act and its implementing regulations, and conditions on the ground control jurisdiction. Where questions arise, a site-specific boundary determination process is available. Commission staff is not aware of any wetland-based geographic appeal jurisdiction within the City's coastal zone.¹¹

Mean High Tide Line Appeal Areas

The Coastal Act specifies that any local government CDP approval for development located within 300 feet of the mean high tide line (MHTL) are appealable to the Commission (where the Act's implementing regulations identify the criteria that defines the MHTL (Section 30603(a)(1) and CCR Section 13577(c)). Commission staff is not aware of any MHTL-based geographic appeal jurisdiction within the City's coastal zone.

First Public Road Paralleling the Sea Appeal Areas

The Coastal Act specifies that any local government CDP approval for development located seaward of the first public road paralleling the sea (FPR)¹² are appealable to the Commission, and the Act's implementing regulations specify the standard by which the FPR is to be designated (Section 30603(a)(1) and CCR Section 13577(i)). The majority of the FPR for the City of Pacifica is defined by CCR Section 13577(i)(1), where the FPR extends inland around water bodies that are considered the "sea" as defined by Coastal Act Section 30115. CCR Section 13577(i)(1)(E) provides that in order for a road to qualify as the FPR, it must be a road that "does in fact connect with other public roads providing a continuous public access system, and generally parallels and follows the shoreline of the sea so as to include all portions of the sea where the physical features such as bays, lagoons, estuaries, and wetlands cause the waters of the sea to extend landward of the generally continuous coastline." The appeal jurisdiction boundary, where based on the FPR under CCR Section 13577(i)(1), is aligned along the inland, or landward right of way of such road.

The FPR within the City and depicted in the updated Post Cert. map is consistent with all elements of CCR Section 13577(i)(1) in that it extends around water bodies considered the "sea" and does in fact connect with other public roads providing a continuous public access system that generally parallels and follows the shoreline of the sea. All other requirements of 13577(i)(1) are met, in that the FPR is lawfully open to uninterrupted public use and is suitable for such use (subsection (A)), is publicly maintained (subsection (B)), is an improved, all-weather road open to motor vehicle

¹¹ Staff note that of the mapped wetland areas in the coastal zone of Pacifica, the FPR is situated farther inland, such that the entire area surrounding the wetlands lies within the Coastal Commission's appeal jurisdiction based on the FPR provision. Staff also note that the map is merely illustrative, and on the ground conditions as they relate to the criteria set forth in the Coastal Act and its implementing regulations take precedence.

¹² Which by definition includes the entirety of the road right of way itself.

traffic in at least one direction (subsection (C)), and is not subject to any restrictions on use by the public except when closed due to an emergency or when closed temporarily for military purposes (subsection (D)).

The series of roadways and streets listed below and shown as a component of the Commission's appeal jurisdiction boundary on the attached **Exhibit 2** constitute the current route of the FPR for purposes of Coastal Act Sections 30600.5, 30601, 30603, and 30115, and all other applicable Coastal Act provisions. This system of coastal roadways and streets is consistent with, and meets the criteria set forth in CCR Section 13577.

From the northern City limit, the route designated as the FPR in the City of Pacifica follows Westline Drive south to Palmetto Avenue, continuing along Esplanade Avenue, then east on West Avalon Drive back to Palmetto Avenue. The FPR proceeds south along Palmetto Avenue to Shoreview Avenue, follows Shoreview Avenue west and then east back to Palmetto Avenue, and then continues west on Paloma Avenue to Beach Boulevard. From there, the route follows Beach Boulevard south to Clarendon Road, continues east on Clarendon Road to Lakeside Avenue, and proceeds south along Lakeside Avenue to Francisco Boulevard. The route continues south on Francisco Boulevard to Fairway Drive, follows Fairway Drive west to Seaside Drive, then south and east along Seaside Drive to Bradford Way. The FPR continues south on Bradford Way to Mori Point Road, where it connects with Highway 1. From this point, the FPR follows along Highway 1 south to San Marlo Way, then west on San Marlo Way to Dondee Way, south on Dondee Way to Rockaway Beach Avenue, and east on Rockaway Beach Avenue returning to Highway 1, which continues south as the FPR for the remainder of the City's coastal zone.

Bisected Parcels and Appeal Areas

In some areas a parcel is bisected by the appeal jurisdiction boundary. All development proposed within the appeal area defined as appealable is subject to the Commission's appellate jurisdiction, and potential appellants must make contentions as they relate to the development proposed in that area. In addition, if a development is proposed partly on the portion of the parcel that forms the basis for geographic appeal jurisdiction, and partly on the remainder of the parcel, and the Commission finds that the portion of the project within its appeals jurisdiction raises a substantial issue, then it will consider the entire proposed development – in and out of the appeals area – de novo.

E. Map Legend and Map Notes

One of the elements of the Commission's transition to using GIS technology is the use of standardized base maps, boundary symbols, and map notes. In order to maintain consistency throughout the coastal zone, Post Cert. maps have been developed using the coastal zone portions of the fifteen coastal counties as the basic unit. Accordingly, the Map Legend for the updated map (see **Exhibit 1**) includes all of the possible types of boundary and area symbols that may occur within any given jurisdiction, while the draft updated map itself will include only those types that are found within that area. In addition, the use of coastal counties as the basic geographic unit means that the maps may depict jurisdiction areas outside of the area for which a particular map adoption is occurring. For the City of Pacifica LCP area, areas shown that are adjacent to the City

but located to the north (City of Daly City) and to the south (San Mateo County) are not affected by the Commission's action to adopt the Post Cert. map for the City of Pacifica. The Commission's action to adopt the Post Cert. map affects only the coastal zone within the City of Pacifica.

3. APPENDICES

A. Substantive File Documents

- City of Pacifica Post LCP Certification Permit and Appeal Jurisdiction Maps (San Francisco South quadrangle 07/08/1980 and Montara Mountain quadrangle 12/02/1980, scale 1:24,000).
- National Wetland Inventory Digital Data, U.S. Fish & Wildlife Service, August 2024.
- U.S. Coast Survey Historical Topographic Maps T-12606 (1963), T-04523 (1929), and T- 00395 (1853).
- ESRI World Imagery basemap service (Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community).
- Google Earth Imagery.
- California Coastal Records Project, 1972-2024.
- U.S. Geological Survey (USGS) 7.5 Minute Series Topographic Maps, (San Francisco South and Montara Mountain quadrangle), USGS, photo-revised.
- National Oceanic and Atmospheric Administration (NOAA). (2016). *West Coast El Niño DEM 2016 (LiDAR Digital Elevation Model)* [Data set]. NOAA Office for Coastal Management.
<https://coast.noaa.gov/htdata/raster2/elevation/West Coast El Nino DEM 2016 6260/>

B. Public Resources Code Sections

Section 30519

(a) Except for appeals to the commission, as provided in Section 30603, after a local coastal program, or any portion thereof, has been certified and all implementing actions within the area affected have become effective, the development review authority provided for in Chapter 7 (commencing with Section 30600) shall no longer be exercised by the commission over any new development proposed within the area to which the certified local coastal program, or any portion thereof, applies and shall at that time be delegated to the local government that is implementing the local coastal program or any portion thereof.

(b) Subdivision (a) shall not apply to any development proposed or undertaken on any tidelands, submerged lands, or on public trust lands, whether filled or unfilled, lying within the coastal zone, nor shall it apply to any development proposed or undertaken within ports covered by Chapter 8 (commencing with Section 30700) or within any state university or college within the coastal zone; however, this section shall apply to any development proposed or undertaken by a port or harbor district or authority on lands or

waters granted by the Legislature to a local government whose certified local coastal program includes the specific development plans for such district or authority.

(c) The commission may, from time to time, recommend to the appropriate local government local coastal program amendments to accommodate uses of greater than local importance, which uses are not permitted by the applicable certified local coastal program. These uses may be listed generally or the commission may recommend specific uses of greater than local importance for consideration by the appropriate local government.

Section 30603

(a) After certification of its local coastal program, an action taken by a local government on a coastal development permit application may be appealed to the commission for only the following types of developments:

(1) Developments approved by the local government between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tideline of the sea where there is no beach, whichever is the greater distance.

(2) Developments approved by the local government not included within paragraph (1) that are located on tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, or stream, or within 300 feet of the top of the seaward face of any coastal bluff.

(3) Developments approved by the local government not included within paragraph (1) or (2) that are located in a sensitive coastal resource area.

(4) (a) Any development approved by a coastal county that is not designated as the principal permitted use under the zoning ordinance or zoning district map approved pursuant to Chapter 6 (commencing with Section 30500).

(b) For purposes of this paragraph, "coastal county" shall not include a local government that is both a city and county.

(5) Any development which constitutes a major public works project or a major energy facility.

(b) (1) The grounds for an appeal pursuant to subdivision (a) shall be limited to an allegation that the development does not conform to the standards set forth in the certified local coastal program or the public access policies set forth in this division.

(2) The grounds for an appeal of a denial of a permit pursuant to paragraph (5) of subdivision (a) shall be limited to an allegation that the development conforms to the standards set forth in the certified local coastal program and the public access policies set forth in this division.

(c) Any action described in subdivision (a) shall become final at the close of business on the 10th working day from the date of receipt by the commission of the notice of the

local government's final action, unless an appeal is submitted within that time. Regardless of whether an appeal is submitted, the local government's action shall become final if an appeal fee is imposed pursuant to subdivision (d) of Section 30620 and is not deposited with the commission within the time prescribed.

(d) A local government taking an action on a coastal development permit shall send notification of its final action to the commission by certified mail within seven calendar days from the date of taking the action.

Section 30603.1

(a) In any city and county which so requests, the commission may adjust the inland boundary of the area within which the issuance of coastal development permits may be appealed to the commission pursuant to paragraph (1) of subdivision (a) of Section 30603. Any such adjustment shall be made solely to avoid the circumstance of having the boundary of that area bisect an individual parcel of property. The adjustment may be made landward or seaward, but shall be the minimum distance necessary, consistent with the policies of Chapter 3 (commencing with Section 30200), to avoid bisecting a parcel of property.

(b) If the commission subsequently finds that the circumstances which warranted a boundary adjustment pursuant to subdivision (a) have changed, it may, after notice to the city and county, readjust the boundary so that it is consistent with the changed circumstances. The requirements of subdivision (a) shall apply to any such boundary adjustment.

Section 30613

(a) The provisions of subdivision (b) of Section 30519, subdivision (b) of Section 30600, and subdivision (b) of Section 30610.5, which apply to lands subject to the public trust shall not apply to any lands which may be subject to the public trust but which the commission, after consultation with the State Lands Commission, determines are (1) filled and developed and are (2) located in an area which is committed to urban uses.¹³

(b) No later than 120 days after receiving a request from a local government, the commission shall determine the lands within the jurisdiction of that local government to which the provisions of subdivision (a) apply.

(c) The provisions of this Section shall apply to lands which have been the subject of coastal development permits, local coastal programs, categorical exclusions or urban exclusions, which have previously been approved, authorized, or certified by the commission.

C. California Code of Regulations Sections

CCR Section 13576

(a) In conjunction with final Local Coastal Program certification or the delegation of coastal development permit authority pursuant to Public Resources Code Section

¹³ The Commission retains appeal jurisdiction over developments occurring on any areas transferred to the permit jurisdiction of the local government.)

30600.5, whichever occurs first, the Commission shall, after public hearing, adopt a map or maps of the coastal zone of the affected jurisdiction that portrays the areas where the Commission retains permit authority pursuant to Public Resources Code Sections 30603 (a) (1) and (a)(2), or 30600.5 (d). These maps shall be drawn based on the criteria for permit and appeal boundary determinations, set forth in Section 13577 below, and will serve as the official maps of the Commission's permit and appeal jurisdiction. The Commission, in consultation with the local government, shall update these maps from time to time, where changes occur in the conditions on which the adopted maps were based, or where it can be shown that the location of the mapped boundary does not adequately reflect the intended boundary criteria. Revisions of the adopted maps shall be based on precise boundary determinations made using the criteria set forth in Section 13577. The updated maps shall be filed with the affected jurisdiction within 30 days of adoption by the Commission. In addition, each adopted map depicting the permit and appeal jurisdiction shall include the following statement:

"This map has been prepared to show where the California Coastal Commission retains permit and appeal jurisdiction pursuant to Public Resources Code Sections 30519(b), 30603(a)(1) and (a)(2) and 30600.5(d). In addition, development may also be appealable pursuant to Public Resources Code Sections 30603(a)(3), (a)(4), and (a)(5). If questions arise concerning the precise location of the boundary of any area defined in the above sections, the matter should be referred to the local government and/or the Executive Director of the Commission for clarification and information. This plat may be updated as appropriate and may not include all lands where permit and appeal jurisdiction is retained by the Commission"

(b) In the case of local governments which have received Commission approval of their Phase III (implementation) Work Program and Budget prior to January 1, 1980, the permit and appeal area maps shall be adopted by the Commission prior to the certification becoming effective pursuant to Section 13547 of the Commission's regulations.

CCR Section 13577

For purposes of Public Resources Code Sections 30519, 30600.5, 30601, 30603, and all other applicable provisions of the Coastal Act of 1976, the precise boundaries of the jurisdictional areas described therein shall be determined using the following criteria:

(a) Streams. Measure 100 feet landward from the top of the bank of any stream mapped by USGS on the 7.5 minute quadrangle series, or identified in a local coastal program. The bank of a stream shall be defined as the watershed and relatively permanent elevation or acclivity at the outer line of the stream channel which separates the bed from the adjacent upland, whether valley or hill, and serves to confine the water within the bed and to preserve the course of the stream. In areas where a stream has no discernable bank, the boundary shall be measured from the line closest to the stream where riparian vegetation is permanently established. For purposes of this section, channelized streams not having significant habitat value should not be considered.

(b) Wetlands.

(1) Measure 100 feet landward from the upland limit of the wetland. Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats. For purposes of this section, the upland limit of a wetland shall be defined as:

(A) the boundary between land with predominantly hydrophytic cover and land with predominantly mesophytic or xerophytic cover;

(B) the boundary between soil that is predominantly hydric and soil that is predominantly nonhydric; or

(C) in the case of wetlands without vegetation or soils, the boundary between land that is flooded or saturated at some time during years of normal precipitation, and land that is not.

(2) For the purposes of this section, the term "wetland" shall not include wetland habitat created by the presence of and associated with agricultural ponds and reservoirs where:

(A) the pond or reservoir was in fact constructed by a farmer or rancher for agricultural purposes; and

(B) there is no evidence (e.g., aerial photographs, historical survey, etc.) showing that wetland habitat pre-dated the existence of the pond or reservoir. Areas with drained hydric soils that are no longer capable of supporting hydrophytes shall not be considered wetlands.

(c) Estuaries. Measure 300 feet landward from the MHTL of the estuary. For purposes of this section, an estuary shall be defined as a coastal water body, usually semi-enclosed by land, having open, partially obstructed, or intermittent exchange with the open ocean, and in which ocean water is at least occasionally diluted by freshwater from the land. The salinity level may be periodically increased to above that of the open ocean due to evaporation. The MHTL shall be defined as the statistical mean of all the high tides over the cyclical period of 18.6 years, and shall be determined by reference to the records and elevations of tidal benchmarks established by the National Ocean Survey. In areas where observations covering a period of 18.6 years are not available, a determination may be made based on observations covering a shorter period, provided they are corrected to a mean value by comparison with observations made at some suitably located control tide station.

(d) Tidelands. Tidelands shall be defined as lands which are located between the lines of mean high tide and mean low tide.

(e) Submerged Lands. Submerged lands shall be defined as lands which lie below the

line of mean low tide.

(f) Public Trust Lands. Public Trust lands shall be defined as all lands subject to the Common Law Public Trust for commerce, navigation, fisheries, recreation, and other public purposes. Public Trust lands include tidelands, submerged lands, the beds of navigable lakes and rivers, and historic tidelands and submerged lands that are presently filled or reclaimed, and which were subject to the Public Trust at any time.

(g) Beaches. Measure 300 feet landward from the inland extent of the beach. The back beach, or dry beach, if it exists, shall be included. The inland extent of the beach shall be determined as follows:

(1) from a distinct linear feature (e.g., a seawall, road, or bluff, etc.);

(2) from the inland edge of the further inland beach berm as determined from historical surveys, aerial photographs, and other records or geological evidence; or

(3) where a beach berm does not exist, from the further point separating the dynamic portion of the beach from the inland area as distinguished by vegetation, debris or other geological or historical evidence.

(h) Coastal Bluffs. Measure 300 feet both landward and seaward from the bluff line or edge. Coastal bluff shall mean:

(1) those bluffs, the toe of which is now or was historically (generally within the last 200 years) subject to marine erosion; and

(2) those bluffs, the toe of which is not now or was not historically subject to marine erosion, but the toe of which lies within an area otherwise identified in Public Resources Code Section 30603(a)(1) or (a)(2).

Bluff line or edge shall be defined as the upper termination of a bluff, cliff, or seacliff. In cases where the top edge of the cliff is rounded away from the face of the cliff as a result of erosional processes related to the presence of the steep cliff face, the bluff line or edge shall be defined as that point nearest the cliff beyond which the downward gradient of the surface increases more or less continuously until it reaches the general gradient of the cliff. In a case where there is a steplike feature at the top of the cliff face, the landward edge of the topmost riser shall be taken to be the cliff edge.

The termini of the bluff line, or edge along the seaward face of the bluff, shall be defined as a point reached by bisecting the angle formed by a line coinciding with the general trend of the bluff line along the seaward face of the bluff, and a line coinciding with the general trend of the bluff line along the inland facing portion of the bluff. Five hundred feet shall be the minimum length of bluff line or edge to be used in making these determinations.

(i) First Public Road Paralleling the Sea.

(1) The "first public road paralleling the sea" means that road nearest to the sea, as

defined in Public Resources Code Section 30115, which:

- (A) is lawfully open to uninterrupted public use and is suitable for such use;
- (B) is publicly maintained;
- (C) is an improved, all-weather road open to motor vehicle traffic in at least one direction;
- (D) is not subject to any restrictions on use by the public except when closed due to an emergency or when closed temporarily for military purposes; and
- (E) does in fact connect with other public roads providing a continuous access system, and generally parallels and follows the shoreline of the sea so as to include all portions of the sea where the physical features such as bays, lagoons, estuaries, and wetlands cause the waters of the sea to extend landward of the generally continuous coastline.

When based on a road designated pursuant to this section, the precise boundary of the permit and appeal jurisdiction shall be located along the inland right-of-way of such road.

(2) Whenever no public road can be designated which conforms to all provisions of (i)(1) above, and a public road does exist, which conforms to all provisions of (i)(1) except (i)(1)(v), the effect of designating the first public road paralleling the sea shall be limited to the following:

- (A) all parcels between the Pacific Ocean and such other public road; and
- (B) those parcels immediately adjacent of the sea inland of such other public road.

(3) Where the Commission determines that the designation of the "first public road paralleling the sea" results in the inclusion of areas within the permit and appeal jurisdiction where the grounds for an appeal set forth in Public Resources Code Section 30603(b) are not an issue, the Commission may take action to limit the geographic area where developments approved by a local government may be appealed to the Commission, to that area where any such grounds are, in fact, an issue.