

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
WEB: WWW.COASTAL.CA.GOV



F9a

A-2-HMB-25-0014 (REDONDO BEACH ROAD GATE/SIGN/CLOSURE)

JUNE 13, 2025

EXHIBITS

Table of Contents

Exhibit 1 – Location Map

Exhibit 2 – Existing Gate and Sign

Exhibit 3 – Commission Staff Comments

Exhibit 4 – City of Half Moon Bay Final Local CDP Action Notice

Exhibit 5 – Appeal of City CDP Action

Exhibit 6 – LUP Figure 5-1: Coastal Access

**EXHIBIT 1: PROJECT LOCATION MAP – REDONDO BEACH ROAD GATE APPEAL
CITY OF HALF MOON BAY**

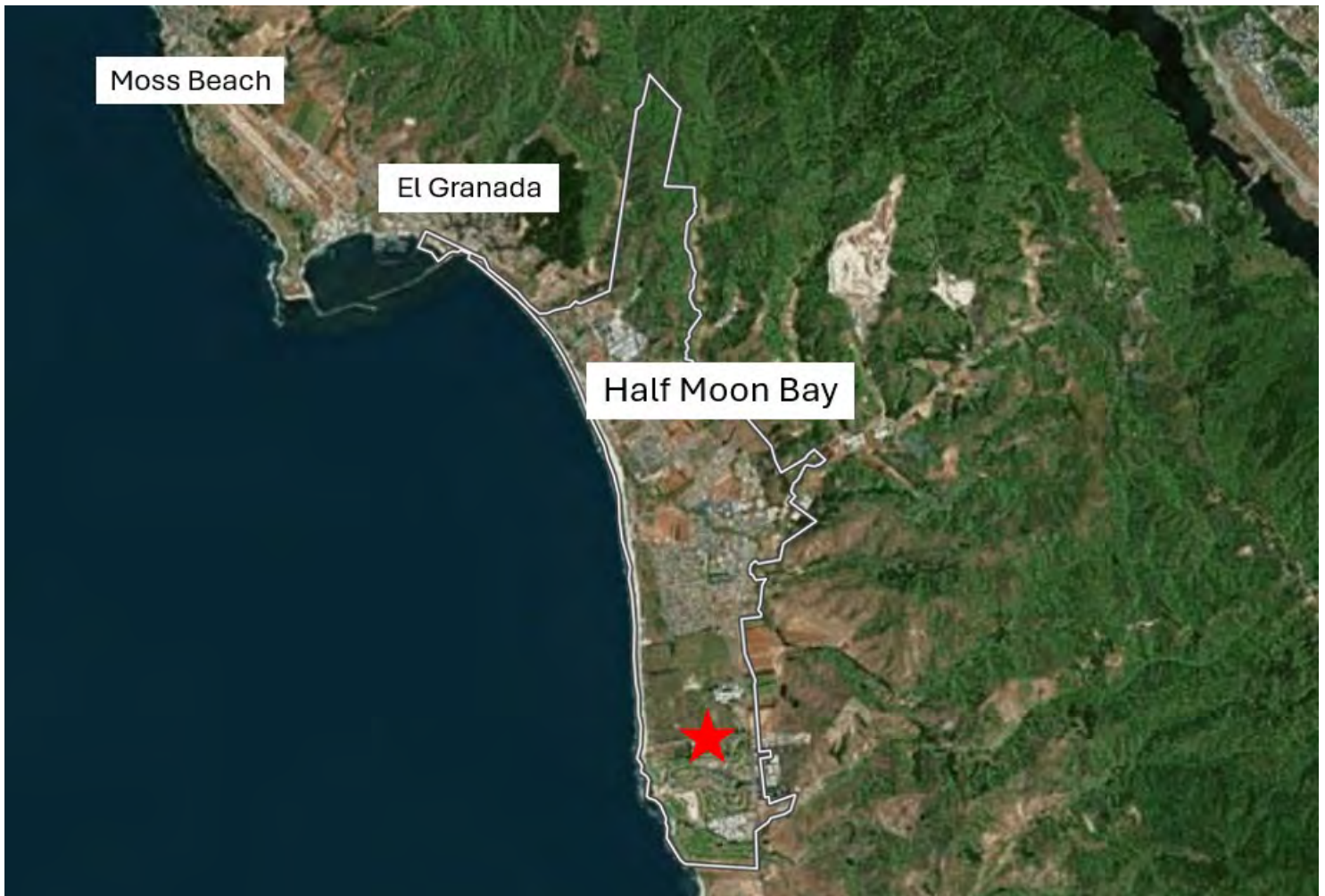


Figure 1: Project Vicinity Map. Project site is shown in red and Half Moon Bay city limit is outlined in white.



Figure 2: Project Location Map. The location of the gate is shown in red, approximately midway between Highway 1 and Redondo Beach, along Redondo Beach Road. The prospective two approved parking lots are shown in blue, and the prospective two approved vertical access points are shown in yellow. The Wavecrest open space area to the north, and the Ocean Colony residential development to the south are labeled to the upper left and lower right of the image, respectively.

EXHIBIT 2: EXISTING GATE AND SIGN – REDONDO BEACH ROAD GATE APPEAL
CITY OF HALF MOON BAY



Figure 1: Existing gate as seen from Redondo Beach Road looking west towards the beach.



Figure 2: Existing gate as seen from Redondo Beach Road looking east towards Highway 1.



Figure 3: Existing gate as seen from the northern shoulder of Redondo Beach Road, looking south towards the Ocean Colony residences.



Figure 4: Existing signage adjacent to existing gate listing beach use hours.

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
WEB: WWW.COASTAL.CA.GOV



March 25, 2025

Scott Phillips, Senior Planner
City Hall, Planning Division
501 Main Street
Half Moon Bay, CA 94019

Subject: Coastal Development Permit Application Number PDP-24-052 (Redondo Beach Nighttime Access Closure)

Dear Mr. Phillips:

It is our understanding that City of Half Moon Bay staff are recommending approval of an after-the-fact (ATF) coastal development permit (CDP) in the above-referenced case, which would recognize an unpermitted gate (and associated signage) that would continue to be used to close off the public street that provides public access to the Redondo Beach and Wavecrest areas from Highway 1 at Redondo Beach Road between sunset and sunrise. As far as we understand it from City staff, the gate was apparently installed in 1985, and the City closed and locked the gate, preventing all vehicular public access at night along the road west of the gate, all without benefit of a CDP, until 2011. The gate has remained open at all hours for the last nearly 15 years, bracketing that unpermitted signage at the gate indicates that the beach is closed at night, again without a CDP. Redondo Beach Road is a City Local Coastal Program (LCP)-designated Coastal Access Route that provides important public access from Highway 1 to the beach, and at present includes an unpaved informal public parking facility and trails at the bluff, all of which is quite popular. In addition, as you are aware, the City recently approved a major set of public access improvements that are to be accessed via this public road, including two new parking lots, restrooms, stairways to the beach, and trail improvements. Per the City's staff report recommending approval of this ATF project, the nighttime closure of Redondo Beach Road is intended to address residential security and public safety concerns related to activities occurring at/near the beach at night. As we have said before (see enclosed), we recommend that the ATF CDP not be approved because the proposed beach access closure is inconsistent with the LCP and Coastal Act public recreational access provisions that form the legal standard of review for the CDP application in this case.

Specifically, both the LCP and the Coastal Act call for public recreational access opportunities – like the public beach access that is provided via Redondo Beach Road both day and night – to not only be retained, but also to be maximized. Furthermore, development that would impact public recreational access, like that proposed here, is required to develop a public coastal access management plan intended to limit impacts to such access, including via minimizing road closures and identifying alternative access routes, all while providing for public safety (see Land Use Plan (LUP) Policy 5-8). The LCP also explicitly requires that if adverse impacts to existing public recreational access cannot be avoided, and no feasible alternatives exist, then such impacts must be appropriately and commensurately mitigated (see LUP Policies 5-6, 5-7, and 5-10).

Redondo Beach Access Nighttime Closure

Furthermore, the LUP requires that any project that results in a reduction or limitation in access to the beach, shoreline, trails and other coastal recreation opportunities, like that proposed, ensure that existing overall levels of public access are maintained and enhanced (LUP Policy 5-9). Lastly, the LUP prohibits restrictions on public parking that would adversely impact public access to beaches and trails, and calls for the minimization of parking lot and beach restrictions or curfews to the extent feasible. Proposals for new time restrictions must evaluate potential impacts to the public, particularly lower income users, and adverse impacts to public access must be mitigated (LUP Policies 5-15 and 5-21).

The proposed project fails to meet the above LCP and Coastal Act tests. Public safety or environmental concerns, where they exist and are appropriately documented, can be appropriate grounds for limitations on public access in some cases, however the LCP-required analyses to support such limitations, and to consider project impacts and necessary mitigation,¹ are simply missing in this case. The materials make clear that the City intends for the proposed nighttime closure to address public safety concerns raised by some residents in the immediate area, including alleged illicit activities such as illegal dumping and use of fireworks in sensitive habitat areas. However, and as we have previously advised, City staff have not to date provided the type of data that would justify a full-blown nighttime public beach access closure, nor adequately analyzed the impacts of such a closure to public access, feasible alternatives to the project, and/or mitigation for unavoidable impacts as required by the LCP and detailed above. It is clear that the proposed project is inconsistent with the LCP and the Coastal Act, and we would strongly suggest that the CDP be denied.

Thank you for the opportunity to provide comment on the above project. Please do not hesitate to contact me at Isobel.Cooper@coastal.ca.gov if you have any questions regarding the above comments.

Sincerely,



Isobel Cooper
Coastal Program Analyst
North Central Coast District
California Coastal Commission

Enclosure: Coastal Commission correspondence dated August 30 through October 30, 2024

cc: Leslie Lacko, City of Half Moon Bay Community Development Director
Sara Polgar, Coastsides Land Trust

¹ The City and Coastsides Land Trust's ongoing efforts to implement the above-described improvements to the beach and public lands accessed by Redondo Beach Road cannot appropriately be applied as mitigation for the proposed gate project. In fact, the gate closure would adversely impact the public's ability to access the very improvements soon to be realized at this location.

Ringuette, Oceane@Coastal

From: Cooper, Isobel@Coastal
Sent: Tuesday, May 20, 2025 2:45 PM
To: Ringuette, Oceane@Coastal
Subject: FW: PDP-24-052 CDP Comment Request, Redondo Beach Gate Follow Up

From: Cooper, Isobel@Coastal
Sent: Wednesday, October 30, 2024 11:46 AM
To: 'Scott Phillips' <SPhillips@hmbcity.com>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <Oceane.Ringuette@coastal.ca.gov>; MBozorginia@hmbcity.com
Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gate Follow Up

Hi Scott,

I do think it could be helpful to see how the Poplar Beach lot/gate 98' and 99' permits were analyzed for LCP compliance as a point of reference.

As for the Redondo Beach gate, while I agree that retaining some access (formal ped/bike access) is preferable to no access, this does not alleviate staff's major concern that closing the gate (whether there is ped/bike access or not) would restrict access in a way that is not Coastal Act compliant. It has not been demonstrated that there are alternate parking/access opportunities, especially considering the significant parking and access improvements that were just recently approved. Staff are particularly concerned that Ocean Colony, a private residential community, would be tasked with restoring access every morning.

Commission staff are generally unsupportive of proposals which reduce access opportunities, and there is a good chance that the CCC would appeal. We understand this may put the City in a difficult position given the public comments surrounding the gate/general safety concerns that came up during the Wavecrest appeals earlier this year, and we're more than happy to keep this discussion open if you feel there may be other approaches.

Thanks,
Isobel

From: Scott Phillips <SPhillips@hmbcity.com>
Sent: Monday, October 21, 2024 2:33 PM
To: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>; MBozorginia@hmbcity.com
Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gate Follow Up

Hello Isobel,

Sorry about the late follow up on this one. I did some research, and two separate Coastal Development Permits were processed back in 1998 for the Poplar Beach parking lot and then in 1999 for adding the horse trailer parking. The plans are offsite in storage, so I have not been able to review them. The CDP scope likely included the gate.

The hours of operation for the Redondo Beach gate would be the same as the hours of operations for the Poplar Beach parking lot gate. The sign would be updated to note gate closures from sunset to sunrise.

As far as review of the CDP for the Redondo Beach gate, based on the email you sent on October 1, it appears that we need more formal pedestrian and bicycle access established with the vehicle gate permitting per the Coastal Act. Could you confirm this statement to be correct? We wanted to double check with you before starting work on conceptual design of bike/ped improvements around the gate.

Thanks,



Scott Phillips

Senior Planner

501 Main Street, Half Moon Bay, CA 94019

(650) 726-8299

www.hmbcity.com

From: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>
Sent: Wednesday, October 9, 2024 10:25 AM
To: Scott Phillips <SPhillips@hmbcity.com>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>
Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gaate

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks Scott,

Does Redondo Beach itself have similar time of use restrictions to Poplar Beach—i.e. is Redondo Beach day use only? The sign posted near the Poplar Beach gate reads “Parking Area Closed 6 pm to 7am PST, 8pm to 6 am PDT.” Are those the hours that the Poplar Street gate is closed, and can you confirm that those hours of operation would be the same for the Redondo Beach gate? Also, could you share the CDP for the operation of the Poplar Beach gate and City Ordinance 10.50.20?

Thanks!

Isobel

From: Scott Phillips <SPhillips@hmbcity.com>
Sent: Wednesday, October 2, 2024 9:52 AM
To: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>
Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gaate

Hello Isobel,

Thank you for the additional feedback. The gate would be closed at night similar to the Poplar Street gate. I agree with you that when the gate is closed, it is certainly not inviting nor intuitive or pedestrians and cyclists to cross on the sides of the gate (see attached photo). Poplar has a pedestrian path that is open all the time to allow pedestrian and bicycle access around the gate and the Redondo gate does not.

I will work with the City Engineer to evaluate this item and get back to you afterwards.
Thanks,



Scott Phillips
Senior Planner
501 Main Street, Half Moon Bay, CA 94019
(650) 726-8299
www.hmbcity.com

From: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>
Sent: Tuesday, October 1, 2024 11:48 AM
To: Scott Phillips <SPhillips@hmbcity.com>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>
Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gaate

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Scott,

Thank you for sharing those additional visuals, agreed the polaroids are pretty remarkable! Just to recap, the proposed project includes a new lock mechanism on the gate, closure of the gate overnight, and new signage indicating gate hours (not beach hours). Poplar Beach to the north is identified as a Day Use area with posted parking lot hours, however, it's my understanding that the gate there is not being closed. Does Redondo Beach itself have similar time of use restrictions (i.e. is the beach day use only)? If not, we think it's difficult to justify closure of the gate from a Coastal Act and LCP perspective. Redondo Beach Road is identified as a secondary coastal access route, however with the implementation of the recently approved formalized parking facilities the LCP indicates this could be designated a primary access route. Even if the beach itself is technically open for use, the closure of the gate effectively restricts all access (not only for vehicles).

Thanks,
Isobel

From: Scott Phillips <SPhillips@hmbcity.com>
Sent: Monday, September 23, 2024 2:35 PM
To: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>
Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>
Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gaate

Hello Isobel,

Thanks for the comments. Attached are some Polaroids taken when Public Works built the gate. Pretty amazing that one of our Public Works employees had them archived from 1985. You are correct, no CDP was requested until now. The scope includes the operational use of the gate and updating the existing locking mechanism per Fire District requirements. The gate would just be closed during nighttime hours. You are correct that the sign will need to be replaced to reflect the hours of gate operation. The Sheriffs Office would be responsible for closing the gate at

night, which would allow the Sherifs Office to sweep straggling motorists. Ocean Colony, right next to the gate, would be responsible for opening the gate in the mornings. Besides nighttime vehicle access, all other coastal access would be maintained. The screenshot below shows where the existing gate is in relation to the new parking lots.



We will be presenting this proposal to our Planning Commission in November. Feel free to reach out if you have any other concerns.

Thank you,



Scott Phillips

Senior Planner

501 Main Street, Half Moon Bay, CA 94019

(650) 726-8299

www.hmbcity.com

From: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>

Sent: Tuesday, September 10, 2024 11:18 AM

To: Scott Phillips <SPhillips@hmbcity.com>

Cc: Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Ringuette, Oceane@Coastal <oceane.ringuette@coastal.ca.gov>

Subject: RE: PDP-24-052 CDP Comment Request, Redondo Beach Gaate

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Scott,

Thanks for sending this over for review. See our preliminary questions/comments below:

- The existing sign with posted *beach* use hours is not enforceable and would need to be removed since, to our knowledge, no CDP was ever issued to implement beach use hours. It is our understanding that the CDP application is concerned solely with the gate, not with beach use hours.
- Per the above comment, operation of the gate would not have any bearing on whether the beach area itself is open for use by the public. Should the closure of the gate go forward, how would access to the beach be retained? Please describe alternate parking and pedestrian access opportunities that could be used when Redondo Beach Road (and access to the recently approved Wavecrest parking areas) is closed to vehicular access.
- What are the proposed hours that the gate would be opened/closed, and who would be responsible for opening/closing the gate?

Best,
Isobel

From: Scott Phillips <SPhillips@hmbcity.com>

Sent: Friday, August 30, 2024 5:47 PM

To: Cooper, Isobel@Coastal <isobel.cooper@coastal.ca.gov>

Subject: PDP-24-052 CDP Comment Request, Redondo Beach Gaate

Hello Isobel,

See the attached router and conceptual plans. This is one that is in the Appeals Jurisdiction and we talked about during our coordination meeting.

Thanks,



Scott Phillips

Senior Planner

501 Main Street, Half Moon Bay, CA 94019

(650) 726-8299

www.hmbcity.com



NOTICE OF FINAL LOCAL ACTION Coastal Development Permit

City of Half Moon Bay Planning Division
501 Main Street, Half Moon Bay, CA 94019
(650) 726-8284 FAX (650) 726-8261

FINAL LOCAL CDP ACTION NOTICE

CCC Received: 4/10/25
CCC Reference: 2-HMB-25-0381
Appeal Period: 4/11-4/24-2025
Logged By: Galen Travis

Date: April 10, 2025 File: PDP-24-052

Applicant: City of Half Moon Bay
501 Main Street
Half Moon Bay, CA 94019

Planner: Scott Phillips, Senior Planner

This notice is being distributed to the Coastal Commission and to those who requested notice. The following project is located within the Appeals Jurisdiction of the Coastal Commission. The Planning Commission unanimously approved the Coastal Development Permit on March 25, 2025, by Resolution No. P-25-02. The Planning Commission's decision was not appealed to the City of Half Moon Bay City Council during the ten working day appeal period.

Project Description: PDP-24-052 – Coastal Development Permit to allow the retroactive approval and operation of the existing gate across Redondo Beach Road in the Planned Unit Development (PUD) Zoning District and the Planned Development District Land Use designation

Project Location: Redondo Beach Road, west of Cabrillo Highway and east of the entrance to the driveway to the golf course maintenance yard.

Term of Permit: This permit shall expire one year from the date the appeal period ends if development authorized by the permit has not commenced.

Final Action: Approved by the Planning Commission on March 25, 2025 based upon findings and conditions contained in Resolution P-25-02.

This project is located within the Appeals Jurisdiction of the California Coastal Commission. The City's action on this Coastal Development Permit Application is appealable to the California Coastal Commission.

April 10, 2025

California Coastal Commission
Attn: Isobel Cooper
455 Market Street, Suite 300
San Francisco, CA 94105

Subject: PDP-24-052 Coastal Development Permit to allow the retroactive approval and operation of the existing gate across Redondo Beach Road in the Planned Unit Development (PUD) Zoning District and the Planned Development District Land Use designation

Dear Ms. Cooper:

Attached is the Notice of Final Action for a Coastal Development Permit for the above project, which was approved by the Half Moon Bay Planning Commission on March 25, 2025. This approval was not appealed to the Half Moon Bay City Council during the working ten-day appeal period. Note that Cesar Chavez Day on March 31 is a recognized City holiday and is not considered a working day in which appeals are accepted. Also, per the City's adopted fee schedule there is no fee for filing an appeal to the City Council.

This project *is* located within the Appeals Jurisdiction of the California Coastal Commission. The City's final action on this Coastal Development Permit is appealable to the California Coastal Commission. Approved by the Planning Commission, Resolution P-25-02, along with final approved drawings.

Should you have questions regarding the Notice of Final Action and supporting material, please contact me at wrescino@hmbcity.com.

Sincerely,

Whitney Rescino
Administrative Assistant
Community Development Department



Google Earth

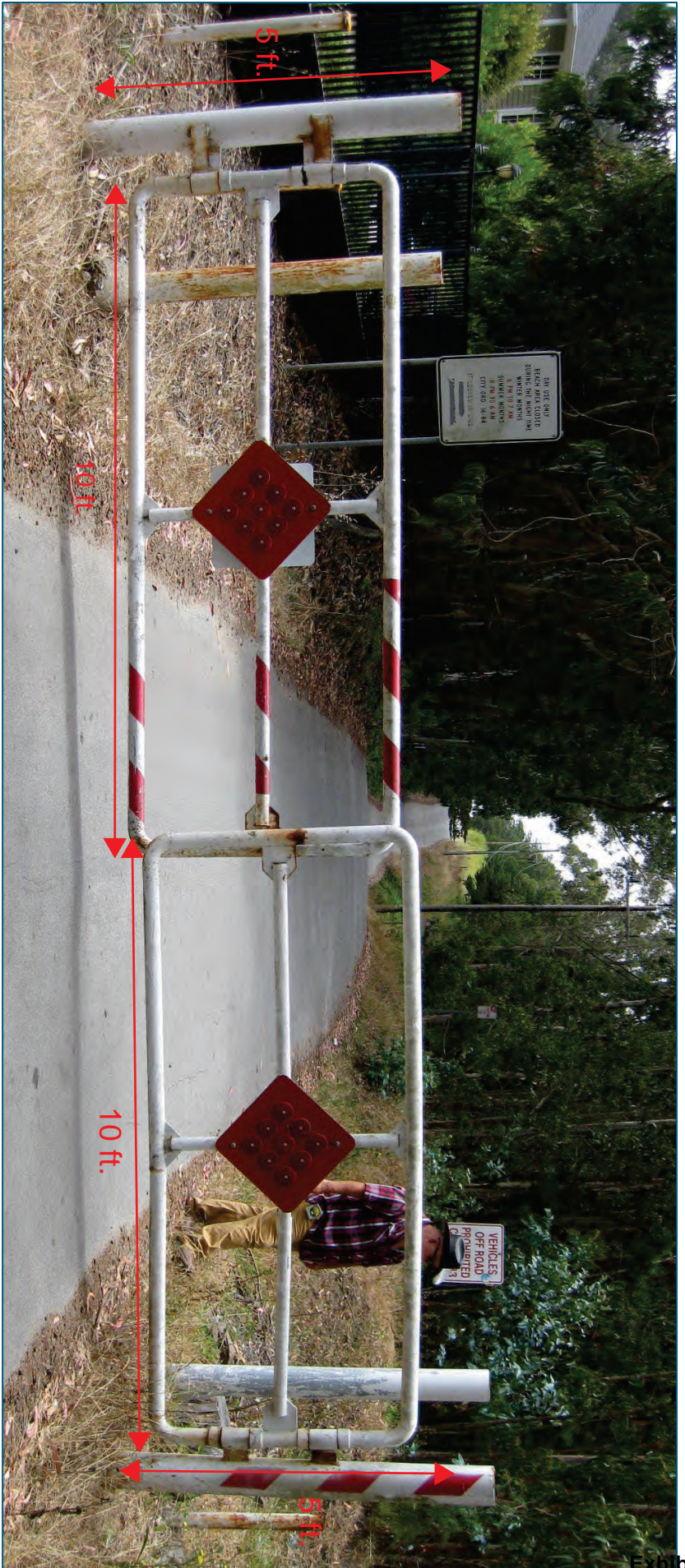
500 ft



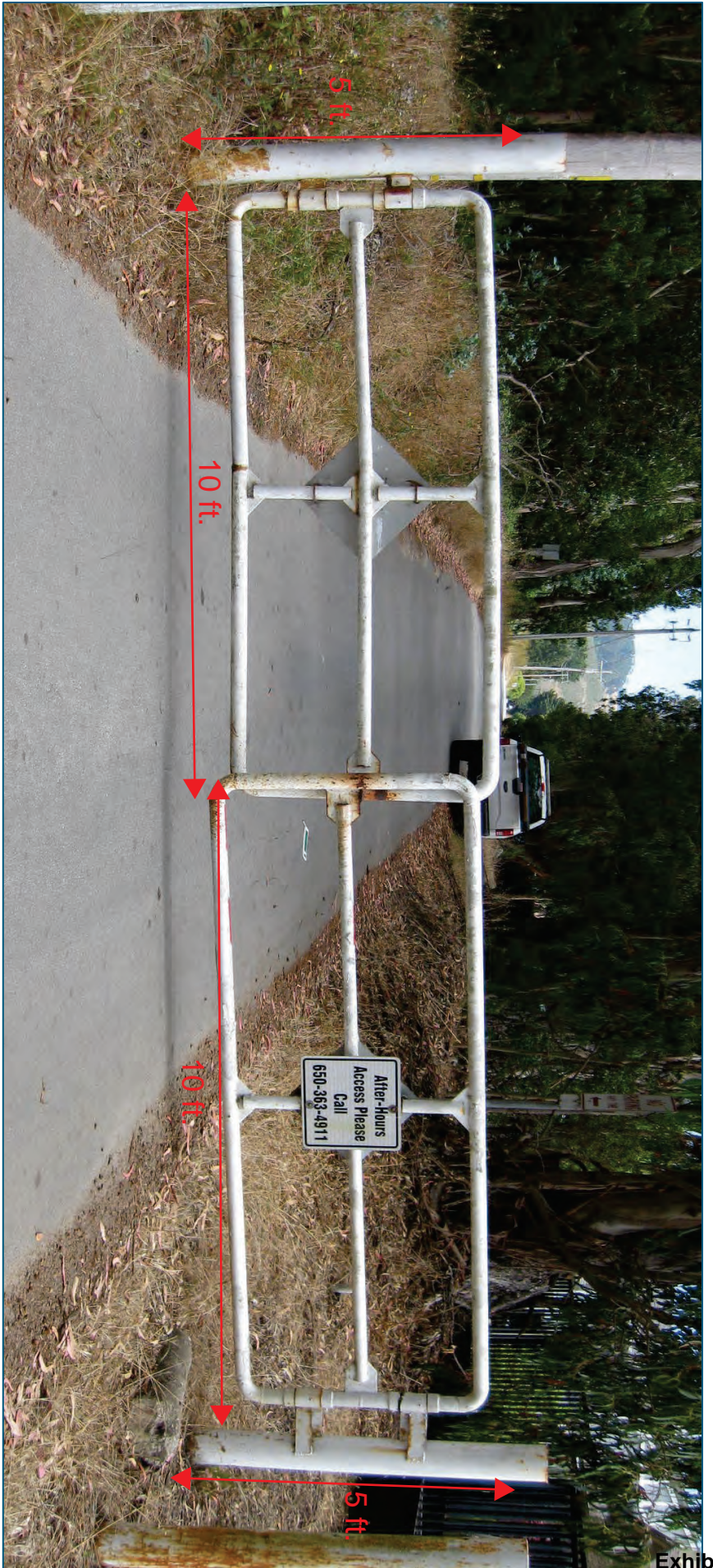
ATTACHMENT 2

Legend

- Existing Gate
- Future CLT Parking Lots



East Elevation



West Elevation



North Elevation



Existing Sign

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
WEB: WWW.COASTAL.CA.GOV

**COASTAL COMMISSIONER APPEAL FORM**

Appeal of a Local Government Coastal Development Permit Action

1. Filing information

Appeal number: A-HMB-25-0014
Date appeal filed: April 17, 2025
District: North Central Coast District
Commissioner: Caryl Hart
Commissioner: Linda Escalante

RECEIVED

APR 18 2025

CALIFORNIA
COASTAL COMMISSION
NORTH CENTRAL COAST

2. Local CDP decision being appealed

Local government: City of Half Moon Bay
CDP application number: PDP-24-052
CDP decision: Approval with Conditions
Date of CDP decision: March 25, 2025
Project location: Redondo Beach Road, approximately midway between Highway 1 and Redondo Beach.
Project description: After-the-fact approval of an existing unpermitted gate and associated signage, and implementation of overnight closure of the gate from sunset to sunrise. The project includes installation of a new locking mechanism, where Coastside Fire Protection District, the Sheriff's Office, Half Moon Bay Public Works Department, and private property owners west of the gate would retain gate access.

3. Applicant information

Applicant: City of Half Moon Bay
Applicant address: 501 Main Street
Half Moon Bay, CA 94019

4. Grounds for this appeal

See attached statement.

5. Commissioner appellant certification

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Commissioner name: Linda Escalante

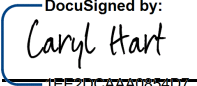
Commissioner signature:  Signed by:
EB983E424CA84E6...

Date of signature: 04/17/2025

6. Commissioner appellant certification

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Commissioner name: Caryl Hart

Commissioner signature:  TEE2DCAA0834D7...

Date of signature: 04/17/2025

Attachment A: Appeal Reasons

The City of Half Moon Bay approved a coastal development permit (CDP) to recognize an existing unpermitted gate and associated signage after-the-fact, and to implement overnight (sunset to sunrise) closure of this gate, blocking public access – including public beach access – along an LCP-designated coastal access route. The gate is located on Redondo Beach Road, about half way between Highway 1 and the beach. The City-approved project (City CDP PDP-24-052) raises LCP and Coastal Act consistency questions relating to protection of public access, as follows:

The Coastal Act and the LCP require public recreational access opportunities to be protected and maximized. The City-approved development is located on a public beach access route which provides access from Highway 1 to Redondo Beach and the Wavecrest open space area, areas where the City recently approved a major set of public access improvements that are all accessed via this same public road (including two new parking lots, restrooms, stairways to the beach, and trail improvements).¹ These public access improvements mean that Redondo Beach Road is a primary coastal access route per the LCP.² The proposed gate would limit access to the bluffs, beach, and these new improvements (and the CCT) from sunset to sunrise. The City points to 9-1-1 calls from the Redondo Beach Road area between 2021 and 2025, as well as reports of illegal dumping, to suggest that the road needs to be closed at night for public safety purposes. However, not only is there little evidence of a public safety problem necessitating a public access closure, but even if there were, the City did not analyze alternative methods to address such concerns while also maintaining existing levels of access, as the LCP requires. In addition, development that would impact public recreational access, like that approved by the City here, is required to develop a public access management plan intended to limit impacts to such access, including via minimizing road closures and identifying alternative access routes, all while providing for public safety (see LUP Policy 5-8). The City did not identify or even analyze potential impacts to access, nor consider measures to avoid or minimize impacts, as required by the LCP. Further, the LCP also explicitly requires that if adverse impacts to public access cannot be avoided, and no feasible alternatives exist, then such impacts must be appropriately and commensurately mitigated (see LUP Policies 5-6, 5-7, and 5-10), none of which occurred here either. In short, it does not appear that the City adequately assessed the project's potential adverse public access impacts, nor did it consider or analyze project alternatives or measures to offset potential impacts.

Furthermore, the LUP requires that any project that results in a reduction or limitation in access to the beach, shoreline, trails and other coastal recreation opportunities, like that approved by the City here, ensure that overall levels of public access are maintained and enhanced (LUP Policy 5-9). In its approval of the project, the City did not assess

¹ CDP PDP-16-032 was approved by the City in March 2024, where that City decision was then appealed to the Coastal Commission (A-2-HMB-24-0008), and the Commission determined no substantial issue existed on May 2024.

² Per the LCP, a primary coastal access route is one which provides a direct connection between Highway 1 and the coast, public parking areas, formal vertical beach access, varying degrees of ADA access, and linkages to the California Coastal Trail (CCT), all of which the recently approved public access improvement project provides.

how the project would impact overall levels of public access, nor did it include measures to offset potential impacts. Lastly, the LUP prohibits restrictions on public parking that would adversely impact public access to beaches and trails, such as the City approved here, and calls for the minimization of parking lot and beach restrictions and curfews to the extent feasible. Proposals for new time restrictions must evaluate potential impacts to the public, particularly lower income users, and adverse impacts to public access must be mitigated (LUP Policies 5-15 and 5-21). None of these required LCP analyses took place, and none of the LCP required mitigations for public access impacts, were they to even be allowed by the LCP, were applied.

In short, the LCP requires public recreational access opportunities to be protected and maximized, and only allows public access restrictions under very specific circumstances, and only then when access impacts are sufficiently analyzed and the project is implemented in such a way as to ensure that overall levels of public access are at least maintained, and that any potential negative impacts to public access are fully mitigated. The City-approved project would result in the overnight closure of a primary public beach access route, where the neither the necessity nor impacts of such a closure have been analyzed in the manner required by the LCP, and where neither potential alternatives nor mitigation have been assessed/provided as is also required by the LCP. Therefore, it is not clear that this project meets the LCP criteria that would allow for these types of access impacts; and it warrants careful consideration to ensure appropriate protection of public access in Half Moon Bay consistent with the protections afforded by the LCP and the Coastal Act.

FIGURE 5-1: COASTAL ACCESS

