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# F9a

Appeal Filed: 4/18/2025  
Action Deadline: 6/27/2025  
Staff: Isobel Cooper - SF  
Staff Report: 5/23/2025  
Hearing Date: 6/13/2025

## STAFF REPORT SUBSTANTIAL ISSUE & DE NOVO REVIEW

**Appeal Number:** A-2-HMB-25-0014

**Applicant:** City of Half Moon Bay

**Appellants:** Commissioners Caryl Hart and Linda Escalante

**Local Government:** City of Half Moon Bay

**Local Decision:** City of Half Moon Bay Coastal Development Permit Number PDP-24-052, approved by the Half Moon Bay Planning Commission on 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, installation of a new locking mechanism on the gate, and implementation of an overnight gate closure (thus blocking beach access) from sunset to sunrise.

**Staff Recommendation:** Substantial Issue Exists; Denial

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### IMPORTANT HEARING PROCEDURAL NOTE

Please note that at the hearing for this item the Commission will not take testimony on staff's substantial issue recommendation unless at least three Commissioners request it. Commissioners may ask questions of the Applicant, aggrieved persons (i.e., generally persons who participated in some way in the local permitting process), the Attorney General, the Executive Director, and their proxies/representatives prior to determining whether or not to take such testimony. If the Commission does decide to take such testimony, then it is generally limited to three minutes total per side (although the Commission's Chair has the discretion to modify those time limits). Only the Applicant, persons who opposed the application before the local government, the local government, and their proxies/representatives are allowed to testify during this

substantial issue phase of the hearing. Other interested parties may submit comments in writing. If the Commission finds that the appeal raises a substantial issue, then the Commission takes jurisdiction over the underlying coastal development permit (CDP) application, and it will then review that application immediately following that determination (unless postponed), at which time all interested parties may testify. If the Commission finds that the appeal does not raise a substantial issue, then the local government CDP decision stands, and is thus final and effective

## SUMMARY OF STAFF RECOMMENDATION

The City of Half Moon Bay approved a CDP providing after-the-fact authorization for an existing gate and signage on Redondo Beach Road, as well as authorization to implement overnight closure of the gate between sunset and sunrise.<sup>1</sup> The appeal primarily contends that the City-approved project restricts public access along an important coastal access route in a manner that is inconsistent with LCP and Coastal Act public access and recreation provisions that require access be maintained and maximized. Specifically, the City-approved project would result in the overnight closure of a public beach access route, where neither the necessity or impacts of such a closure have been analyzed in the manner required by the LCP, and where neither potential alternatives nor mitigations have been analyzed or proposed in conformance with the LCP. In short, the LCP requires public 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. None of which occurred with the City's action in this case.

Specifically, 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). The City points to recent 911 calls and 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, , even if such a problem were to exist, the City did not analyze alternative methods to address public safety concerns while also maintaining existing levels of public 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. 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

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<sup>1</sup> Where only Coastside Fire Protection District, the San Mateo County Sheriff's Office, Half Moon Bay Public Works Department, Half Moon Bay Golf Links/Ocean Colony Partners, LLC staff, and private property owners west of the gate where Redondo Beach Road provides the only means of access would be provided gate keys/access, if requested (at present, the City has agreed to provide access to Coastside Land Trust and a single homeowner at the western terminus of Redondo Beach Road).

impacts to public access cannot be avoided, and no feasible alternatives exist, then such impacts must be appropriately and commensurately mitigated, none of which occurred here either. And all of these issues are magnified when seen through an environmental justice lens. Not only because the project creates barriers to no-cost coastal access amenities, which could disproportionately impact environmental justice communities, but also when understood in terms of the historical use of curfews like this to uphold discriminatory policies. In short, the City did not adequately assess the project's potential adverse public access impacts, nor did it consider or analyze project alternatives or measures to offset potential impacts. Thus, The City did not perform the LCP's required public access impact analyses, and did not consider nor apply of the LCP required mitigations for public access impacts.

For all of the above reasons, staff believes that the City's action raises substantial LCP and Coastal Act public access and recreation conformance issues, including as understood through an environmental justice lens, and that those same issues direct CDP denial on de novo review of the underlying CDP application. If the Applicant still wants to pursue the project or some variation thereof, then the Applicant is welcome to reapply to the City wherein the City should appropriately address the issues identified in this report through a new CDP process. Furthermore, due to the lack of analysis, Commission staff believe fixing the projects LCP conformance issues through the de novo permit process is not a good use of the Commission's scarce staff resources(nor is the Commission required to condition a project to bring it into conformance with the LCP). Thus, staff recommends substantial issue and denial,<sup>2</sup> and the motions and resolutions for both actions are found on **page 5** below.

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<sup>2</sup> And staff notes that violations of the Coastal Act and the City's LCP exist at the subject site including, but not necessarily limited to, the unpermitted installation of a gate on Redondo Beach Road; the unpermitted installation of signage listing unauthorized beach curfew hours; and the unpermitted overnight closure of the gate between 1985 and approximately 2015. Should the Commission find substantial issue and deny the CDP for the project de novo, per staff's recommendation, the violations described above will be referred to the Commission's enforcement division to consider options for future action.

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## EXHIBITS

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

## 1. MOTION AND RESOLUTIONS

### A. Substantial Issue Determination

Staff recommends that the Commission determine that a **substantial issue** exists with respect to the grounds on which the appeal was filed. A finding of substantial issue would bring the CDP application for the proposed project under the jurisdiction of the Commission for de novo hearing and action. To implement this recommendation, staff recommends a **NO** vote on the following motion. Failure of this motion will result in a de novo hearing on the CDP application, and adoption of the following resolution and findings. Passage of this motion will result in a finding of no substantial issue and the local action will become final and effective. The motion passes only by affirmative vote of a majority of the Commissioners present.

***Motion:*** *I move that the Commission determine that Appeal Number A-2-HMB-25-0014 raises **no substantial issue** with respect to the grounds on which the appeal has been filed under Section 30603 of the Coastal Act, and I recommend a **no** vote.*

***Resolution to Find Substantial Issue:*** *The Commission hereby finds that Appeal Number A-2-HMB-25-0014 presents a substantial issue with respect to the grounds on which the appeal has been filed under Section 30603 of the Coastal Act regarding consistency with the certified Half Moon Bay Local Coastal Program and/or the public access and recreation policies of the Coastal Act.*

### B. CDP Determination

Staff recommends that the Commission, after public hearing, **deny** a coastal development permit for the proposed development. To implement this recommendation, staff recommends a **NO** vote on the following motion. Failure of this motion will result in denial of the CDP and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

***Motion:*** *I move that the Commission approve Coastal Development Permit Number A-2-HMB-25-0014, and I recommend a no vote.*

***Resolution to Deny the Coastal Development Permit:*** *The Commission hereby denies coastal development permit Number A-2-HMB-25-0014 on the grounds that the development is inconsistent with the certified Half Moon Bay Local Coastal Program and/or the public access and recreation policies of the Coastal Act. Approval of the permit would not comply with the California Environmental Quality Act because there are feasible mitigation measures and/or alternatives that would substantially lessen the significant adverse effects of the development on the environment.*

## 2. FINDINGS AND DECLARATIONS

### A. Project Location and Description

The proposed project is located on Redondo Beach Road, with the site itself located approximately midway between Highway 1 and Redondo Beach itself, in Half Moon Bay (see **Exhibit 1** for a location map). The area generally north and west of the site consists of the undeveloped North Wavecrest bluffs and open space area. Directly south of Redondo Beach Road is a private residential community (Ocean Colony), the Ritz-Carlton Hotel, and the Half Moon Bay Golf Links.<sup>3</sup> Redondo Beach Road is an east-west, two lane, two-way, road extending seaward from Highway 1 that terminates at an existing informal blufftop dirt parking area above Redondo Beach, where visitors can access the beach, as well as a network of informal trails connecting to the California Coastal Trail (CCT) to the north and south.

Redondo Beach Road is currently designated as a “secondary” Scenic Coastal Access Route by the LCP. Secondary coastal access routes are those that provide long-established connections between Highway 1 and the California Coastal Trail, but do not provide formalized public parking. However, the City recently approved Coastside Land Trust’s Wavecrest Coastal Trail Project<sup>4</sup> which provides for a suite of access and recreation improvements in this area, including revegetating the existing informal parking area atop the bluff, constructing two parking areas just inland of that along the road, constructing a new restroom, adding two beach access stairways, and improving approximately 2.8 miles of pedestrian trails, including connecting the CCT across this area. When such development is complete (it is scheduled to start July 2025, Redondo Beach Road will be an LCP-designated “primary” Scenic Coastal Access Route.<sup>5</sup>

The proposed project consists of after-the-fact authorization of an existing metal gate and associated signage on Redondo Beach Road approximately 0.4 miles seaward of Highway 1 and 0.4 miles inland of Redondo Beach,<sup>6</sup> and closure of that gate to block public access along the road between sunset and sunrise each day. The gate was originally installed by the City without a CDP in 1985, and was closed and locked at around sunset each day to limit nighttime access to the beach and the beach parking

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<sup>3</sup> Ocean Colony Partners, LLC operates Half Moon Bay Golf Links, managing and maintaining the two golf courses (the “Ocean Course” and the “Old Course”) in and around the Ritz-Carlton Hotel and the Ocean Colony residential community, south of Redondo Beach Road. The Half Moon Bay Golf Links maintenance yard is accessible from Redondo Beach Road, west of the proposed gate.

<sup>4</sup> The City’s approval of CDP PDP-16-032 was appealed to the Commission in March 2024 (A-2-HMB-24-0008). The Commission found No Substantial Issue at its May 2024 hearing, and the City’s approval was upheld.

<sup>5</sup> 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 CCT), all of which the recently approved Wavecrest Coastal Trail Project provides.

<sup>6</sup> The unpermitted gate and signage are Coastal Act and LCP violations; see “Violation” section of this report for more information.

area at the western end of Redondo Beach Road until 2015.<sup>7</sup> City staff are unsure of exactly when the signage was originally installed without a CDP, but estimate that any originally installed signage was replaced with the existing sign in or around 2000, also without a CDP. See **Exhibit 2** for photos of the gate and signage.

The proposed project would reestablish the past practice of closing the gate from sunset to sunrise, which the City alleges is necessary to address safety and security concerns,<sup>8</sup> and would also include installation of a new locking mechanism on the existing gate. Although the City did not explicitly designate in its CDP action who would be responsible for opening and closing the gate, the City's staff report indicated that gate keys/access would be provided to the Coastside Fire Protection District, the San Mateo County Sheriff's Office, Half Moon Bay Public Works Department, Half Moon Bay Golf Links staff, and private property owners west of the gate where Redondo Beach Road provides the only means of access would be provided gate keys/access, if requested (at present, the City has agreed to provide access to Coastside Land Trust and a single homeowner at the western terminus of Redondo Beach Road).

### **B. Half Moon Bay CDP Approval**

On March 25, 2025 the City of Half Moon Bay Planning Commission held a public hearing on the proposed above-described project. Commission staff had been providing comments on the proposal to City staff throughout the local planning process, and submitted a comment letter for the Planning Commission's consideration, expressing concerns that the proposed gate/beach closure would be inconsistent with the public access provisions of the certified LCP and the Coastal Act and should be denied (see **Exhibit 3**). Ultimately, the Planning Commission unanimously approved the CDP for the project on that day, where that approval was not appealed to the City Council, thus constituting the City's final action on the CDP application. The City's notice of this final CDP action was received in the Coastal Commission's North Central Coast District Office on Thursday, April 10, 2025 (see **Exhibit 4**), and the Coastal Commission's appeal period for this action ran through 5 pm on April 24, 2025. One valid appeal (discussed below and shown in **Exhibit 5**) was received during the appeal period.

### **C. Appeal Procedures**

Coastal Act Section 30603 provides for the appeal to the Coastal Commission of certain CDP decisions in jurisdictions with certified LCPs. The following categories of local CDP decisions are appealable: (a) approval of CDPs for development that is located (1) 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 tide line of the sea where there is no beach, whichever is the greater distance; (2) 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) in a sensitive coastal resource area; or (b) for

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<sup>7</sup> The closures were managed both by the City, San Mateo County Sheriff's Office, and by Half Moon Bay Golf Links staff during this time.

<sup>8</sup> According to the City, the San Mateo County Sheriff's Office has received an average of about a dozen calls per year between 2021 and 2024 reporting potential illegal activities taking place at or along Redondo Beach Road, where the City indicates that reports of illegal fireworks or "suspicious occupied vehicles" were the most common type of complaint received by the Sheriff's Office.

counties, approval of CDPs for development that is not designated as the principal permitted use under LCP. In addition, any local action (approval or denial) on a CDP for a major public works project (including a publicly financed recreational facility and/or a special district development) or an energy facility is appealable to the Commission. This City CDP decision is appealable because the City-approved project is located between the sea and the first public road paralleling the sea.

For appeals of a CDP approval, grounds for appeal are limited to allegations that the approved development does not conform to the LCP and/or to Coastal Act public access provisions. For appeals of a CDP denial, where allowed (i.e., such appeals are only allowed in extremely limited circumstances – see description of appealable actions, above), the grounds for appeal are limited to allegations that the development conforms to the LCP and to Coastal Act public access provisions.

The Commission's consideration of appeals is a two-step process. The first step is determining whether the appeal raises a substantial issue that the Commission, in the exercise of its discretion, finds to be significant enough to warrant the Commission taking jurisdiction over the CDP application. This step is often referred to as the "substantial issue" phase of an appeal. The Commission is required to begin its hearing on an appeal and address at least the substantial issue question within 49 working days of the filing of the appeal unless the applicant has waived that requirement, in which case there is no deadline for Commission action. In this case, the Applicant has not waived the 49 working day hearing requirement.

The Coastal Act and the Commission's implementing regulations are structured such that a substantial issue is presumed when the Commission acts on this question unless the Commission finds that an appeal does not raise a substantial issue, and the Commission generally considers a number of factors in making that determination.<sup>9</sup> At this stage, the Commission may only consider issues brought up by the appeal. At the substantial issue hearing, staff will make a recommendation for the Commission to find either substantial issue or no substantial issue. If staff makes the former recommendation, the Commission will not take testimony at the hearing on the substantial issue recommendation unless at least three Commissioners request it, and, if no such full hearing is requested, a substantial issue is automatically found. If the Commission does take testimony, it is generally (and at the discretion of the Commission Chair) limited to three minutes total per side, and only the Applicant, Appellant, persons who opposed the application before the local government, the local

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<sup>9</sup> The term substantial issue is not defined in the Coastal Act. The Commission's regulations indicate that the Commission will hear an appeal unless it "finds that the appeal raises no substantial issue" (California Code of Regulations, Title 14, Section 13115(b)). Section 13115(c) of the Commission regulations provides, along with past Commission practice, that the Commission may consider the following five factors when determining if a local action raises a substantial issue: (1) the degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the certified LCP; (2) the extent and scope of the development as approved by the local government; (3) the significance of the coastal resources affected by the decision; (4) the precedential value of the local government's decision for future interpretation of its LCP; and (5) whether the appeal raises only local issues as opposed to those of regional or statewide significance. The Commission may, but need not, assign a particular weight to a factor, and may make a substantial issue determination for other reasons as well.



government, and their proxies/representatives are allowed to testify, while others may submit comments in writing.

If, following testimony and a public hearing, the Commission determines that the appeal does not raise a substantial issue, then the first step is the only step, and the local government's CDP decision stands. However, if the Commission finds a substantial issue, the Commission takes jurisdiction over the underlying CDP application for the proposed project, and the appeal heads to the second phase of the hearing on the appeal.

In the second phase of the appeal, if applicable, the Commission must determine whether the proposed development is consistent with the applicable LCP (and in certain circumstances, including in this case, the Coastal Act's public access and recreation provisions). This step is often referred to as the "de novo" review phase of an appeal, and it entails reviewing the proposed project in total. There is no legal deadline for the Commission to act on the de novo phase of an appeal. Staff will make a CDP decision recommendation to the Commission, and the Commission will conduct a public hearing to decide whether to approve, approve with conditions, or deny the subject CDP. Any person may testify during the de novo phase of an appeal hearing (if applicable).

#### **D. Summary of Appeal Contentions**

The appeal contends that the City-approved project limits access along a public beach access route and would reduce public access and recreation opportunities in a manner inconsistent with LCP and Coastal Act provisions that require public access to be protected and maximized. Please see **Exhibit 5** for the full appeal contentions.

#### **E. Standard of Review**

The standard of review for considering these appeal contentions is the certified Half Moon Bay LCP (which is made up of a certified Land Use Plan (LUP) and a certified Implementation Plan (IP)) as well as the Chapter 3 public access and recreation policies of the Coastal Act.

#### **F. Substantial Issue Determination**

##### ***Applicable Coastal Act and LCP Provisions***

Maximizing public recreational access opportunities is a fundamental objective of the Coastal Act, which also protects against impacts to existing public access. Relevant provisions include:

***Section 30210.*** *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

***Section 30211.*** *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

**Section 30212(a).** *Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. ...*

**Section 30212.5.** *Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

**Section 30213.** *Lower cost visitor and recreational facilities shall be protected, encouraged, and where feasible, provided. Development providing public recreational opportunities are preferred. ...*

**Section 30220.** *Coastal areas suited for water-oriented recreational activities that cannot readily provided at inland water areas shall be protected for such uses.*

**Section 30221.** *Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.*

**Section 30223.** *Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.*

Further, Coastal Act Section 30240(b) protects parks and recreation areas, while Section 30252 speaks to more broadly protection and enhancing public access, stating:

**Section 30240(b).** *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas.*

**Section 30252.** *The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park and acquisition and development plans with the provision of onsite recreational facilities to serve the new development.*

Additionally, Section 30604(h) of the Coastal Act allow for the consideration of environmental justice when making CDP decisions, while Section 30013 defines environmental justice.

**Section 30604(h).** *When acting on a coastal development permit, the issuing agency, or the Commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state.*

**Section 30013.** *The Legislature further finds and declares that in order to advance the principles of environmental justice and equality, subdivision (a) of Section 11135 of the Government Code and subdivision (e) of Section 65040.12 of the Government Code apply to the commission and all public agencies implementing the provisions of this division. As required by Section 11135 of the Government Code, no person in the State of California, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, genetic information, or disability, shall be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination, under any program or activity that is conducted, operated, or administered pursuant to this division, is funded directly by the state for purposes of this division, or receives any financial assistance from the state pursuant to this division.*

The LCP's public access and recreation provisions echo those Coastal Act provisions, which is appropriate given they derive their authority from the Coastal Act,<sup>10</sup> and must be understood in terms of the Act's provisions. The LCP states:

**LUP Policy 5-1: Maximum Coastal Access and Recreational Opportunities.** *Provide maximum coastal access and recreational opportunities for all people consistent with public safety needs and the need to protect public rights, rights of property owners, and natural resource areas from overuse.*

**LUP Policy 5-2: Public Shoreline Access Rights.** *Continue to ensure that the public retains right of access to the shoreline and sea as provided by the public trust doctrine, where acquired through historic use of legislative authorization, and where environmentally appropriate.*

**LUP Policy 5-3: Environmental Justice.** *Minimize barriers to public coastal access to the maximum extent feasible, including ensuring that public access and recreational opportunities account for the social, physical, and economic needs of all people.*

**LUP Policy 5-6: Public Access Required in New Development.** *Require new development proposed between the first public roadway and the shoreline and along the coast to provide public access. Exceptions to this requirement shall be*

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<sup>10</sup> See, for example, *McAllister v. Cal. Coastal Com'n* ((2008) 169 Cal.App.4th 912, 930-932) which held that: "Although local governments are responsible for drafting the 'precise content' of their local coastal programs, those subdivisions must, at a minimum, conform to and not conflict with the resource management standards and policies of the [Coastal] Act," and as such, any ambiguities must be interpreted as being consistent with the Coastal Act standards.

*granted only where public access would pose a safety risk or threat to fragile resources, or where adequate access exists nearby.*

**LUP Policy 5-7: Public Access Maximized in New Development.** *New development shall ensure that public access opportunities are maximized by including measures to offset any temporary and potentially permanent impacts to public access caused by the project. To the extent possible, development shall provide public access improvements, including within the private development project (e.g. visitor-serving development), where appropriate.*

**LUP Policy 5-8: New Development Coastal Access Management Plan.** *Development with the potential to impact public coastal access, whether during construction or after, shall develop a public coastal access management plan designed to identify and limit impacts to public coastal access. Plans shall identify peak use times and measures to avoid disruption during those times; minimize beach, road, and trail closures; identify alternative access routes; and provide for public safety.*

**LUP Policy 5-9: Public Coastal Access Changes.** *Any reduction or limitations in access to the beach, shoreline, trails, and parks for coastal recreation, such as signs limiting public parking or restricting use of existing lateral/or vertical accessways, shall require a coastal development permit. Such projects shall ensure that existing overall levels of public access are maintained or enhanced, such as through the provisions of bike lanes and bicycle parking, pedestrian trails, and relocated vehicular parking spaces so as to fully mitigate any potential negative impacts and maximize access opportunities.*

**LUP Policy 5-10: Mitigation for Impacts to Public Coastal Access.** *Where adverse impacts to existing public coastal access cannot be avoided by new development and no feasible alternative exists, ensure that impacts are mitigated such as through the dedication of a new access trail easement in perpetuity or the provision of improvements to other public coastal access points in Half Moon Bay.*

**LUP Policy 5-15: Beach Fees and Time Restrictions.** *Maintain no-cost and lower-cost user fees and parking fees, and minimize parking lot and beach curfews to the extent feasible in order to maximize public access and recreation opportunities. Imposing new time restrictions or fees at public parking lots, particularly where none previously existed shall require a coastal development permit and shall evaluate potential for impacts to lower income users.*

**LUP Policy 5-21: Restrictions on Parking.** *Prohibit restrictions on public parking that would adversely affect public access to beaches, trails, or other recreational lands along the coast except where necessary to protect public safety and preserve neighborhoods for primarily residential use. Mitigation may be required for implementation of parking restrictions where adverse impacts to public access cannot be avoided, such as through provision of off-site parking or an in-lieu fee to support a public access project in the City.*

***LUP Policy 5-22: Private Roads and Gates.*** *Prohibit gates and other barriers designed to regulate access on private roads where such barriers have the potential to impede access to public trails and recreational areas.*

### **Analysis**

As demonstrated above, maximizing coastal access and recreational opportunities is one of the primary objectives of both the Coastal Act and the City's certified LCP, both of which require public access to and along the coast be maximized, while also considering public safety, property rights, and natural resources protection. The City-approved gate is located on a public beach access route that provides access from Highway 1 to Redondo Beach and is identified as a scenic coastal access route in LUP Figure 5-1 (Coastal Access, see **Exhibit 6**). The City recently approved a significant package of public access improvements within the Wavecrest area (Coastside Land Trust's Wavecrest Coastal Trail Project)<sup>11</sup> that is also accessed by Redondo Beach Road, including 2.8 miles of improved trails, viewpoints, two new parking areas, a restroom and water fountain, stairways to the beach, and bicycle racks, where Redondo Beach Road will serve as the primary vehicular access way to these new access amenities. When completed (construction is expected to start July 2025, Redondo Beach Road would be LCP-designated as a primary scenic coastal access.<sup>12</sup> Here, the City-approved project would block general public use of the road and the public access areas, including the beach, from the gate location seaward from sunset to sunrise.

The appeal contends that overnight closure of the gate would limit public access to the bluffs, beach, and trails accessed from Redondo Beach Road, and that the necessity of such a closure has not been sufficiently established. LUP Policies 5-1, 5-2, 5-3 and 5-7 call for maximizing coastal access and recreation opportunities, and minimizing barriers to these features. LUP Policy 5-6 requires new development situated between the first public road and the shoreline to provide public access. An exception to this requirement can be made only when it is shown that a risk to safety or threat to sensitive resources exists, or where adequate access exists nearby.

According to the City, between 2021 and 2025 the San Mateo County Sheriff's Office received between 4 and 14 calls per year from the Redondo Beach Road area. Call logs provided by the Sheriff's Office indicate that complaints of "suspicious occupied vehicles" and illegal fireworks made up a majority of the calls. The City further indicates that its Community Preservation Specialists receive between 7 and 10 calls per year reporting illegal dumping at the public parking lot where Redondo Beach Road meets the beach (where the City maintains a trash dumpster). In its approval, the City argued that closure of the gate and access past it to the west between sunset and sunrise would improve public safety, citing "extreme fire risk" related to illegal fireworks as well as the dangers associated with accessing blufftop paths at night. However, while police

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<sup>11</sup> Funded at least in part by a grant of approximately \$3.4 million from the State Coastal Conservancy in 2024.

<sup>12</sup> 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 Wavecrest Coastal Trail Project provides.

complaints can help to establish a pattern of crime or public safety concerns, such complaints do not necessarily translate to any documented or confirmed incidents, and here the City provided no evidence of any documented or confirmed incidents, let alone a pattern of crime or public safety concerns that would suggest that an access closure was necessary. Furthermore, the call logs provided by the Sheriff's Office show that half of the calls were received during the day between 6:00 a.m. and 6:00 p.m.<sup>13</sup> In short, the City did not adequately establish that a threat to public safety or sensitive resources exist as required by the LCP to warrant this kind of restriction on a public coastal access route, nor did it analyze whether adequate access exists nearby, also contrary to the requirements and objectives of the LCP.

Furthermore, even if the City had provided robust evidence of a documented, ongoing, substantial threat to public safety in the Redondo Beach area that would suggest restricting overnight access is appropriate, the City did not analyze alternative approaches to address such concerns while also maintaining existing levels of access, as is required by the LCP.<sup>14</sup> Per LCP Policy 5-10, where projects would adversely impact public coastal access, like this one, it must be shown that these impacts cannot be avoided, and that no feasible alternatives exist. In instances where impacts to access are unavoidable, and less impactful alternatives are shown to be infeasible, existing overall levels of public access are also required to be maintained or enhanced in order to sufficiently mitigate for any potential impacts to access (see LCP Policies 5-9 and 5-10).<sup>15</sup> And, even in cases where a true safety and/or nighttime resource concern is identified, it is quite unusual for the 'solution' to that 'problem' to run from sunset to sunrise, including as there are many who recreate along the coast during those times (e.g., for sunset walks, early morning fishing/surfing, etc.). In fact, the Commission has historically considered daylight hours to run from an hour before sunrise to an hour after sunset; has repeatedly recognized that there are legitimate public access activities even after sunset; and has limited closure times, where such closures are allowed at all,<sup>16</sup> accordingly.<sup>17</sup> At a minimum, the City-approved project does not protect existing

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<sup>13</sup> The San Mateo County Sheriff's Office provided a log of calls from the Redondo Beach Road area between June 2021 and January 2025. The Sheriff's office received a total of 53 calls during this time. In that period, 26 calls were made between the hours of 6:00 a.m. and 6:00 p.m., representing 49% of the total calls received.

<sup>14</sup> Should a public safety problem be proven to exist, potential alternatives to restricting public access could include, but are not limited to, increased security/law enforcement patrols, installation of security lighting and/or security cameras, etc.

<sup>15</sup> For example, if an actual problem were proven to exist that required a gated closure, which is not the case here, existing levels of access could be maintained or enhanced by providing bike lanes, bike parking, pedestrian trails, alternate parking areas etc., and impacts to access could be mitigated via new public access amenities (e.g., new trails, overlooks, benches, picnic benches, etc.).

<sup>16</sup> In fact, permitted nighttime public access closures are actually quite limited, with the only one on the Central Coast being in the City of Santa Cruz.

<sup>17</sup> For example, the beach access closure in the City of Santa Cruz runs from midnight to 5am on Cowell and Main Beaches, and even there the closure identifies alternate means of access (e.g., allowing for folks to walk across the sand to get to the ocean and to recreate in the ocean, and to walk along the wet sand at the ocean's edge, even when the beach is 'closed' between midnight and 5am).

access, and it does not maximize public recreational access opportunities, both of which mean that the City's decision is inconsistent with the LCP and the Coastal Act.

In fact, in this case, the City did not analyze the feasibility of alternatives to restricting access to a public coastal access road, and did not consider how existing levels of access would be maintained or impacts to access mitigated, all of which is required by the LCP. In its approval, the City argues that nighttime access along Redondo Beach Road would be maintained because visitors would be able to walk or bike around the closed gate. It should be noted, however, that Redondo Beach Road does not feature bike lanes, paved sidewalks or shoulders. Furthermore, the City suggests that limiting overnight vehicular access along this public coastal access route would be tempered by the recently approved access and recreation features in the Wavecrest area, including two new parking lots, a restroom, trail improvements, and vertical access points.<sup>18</sup> However, all of these features would be located seaward of the proposed gate, and thus inaccessible by car between sunset and sunrise. Moreover, past approval or implementation of access and recreation improvements cannot serve as suitable mitigation for existing or future proposals that would adversely affect public access.

In addition, the City's approval does not comply with LUP Policy 5-8, which requires projects that would impact public recreational access, like the overnight closure of a public coastal access route approved by the City here, to develop a public access management plan. A public access management plan is meant to identify and limit impacts to public coastal access, including by identifying peak use times and measures to avoid disruption during those times; measures to minimize beach, road, and trail closures; alternative access routes; and provisions to assure public safety. The City did not develop a coastal access management plan as part of its analysis or approval, did not sufficiently identify or even analyze potential impacts to access, and did not consider measures to avoid or minimize impacts, all of which are required by the LCP.

Further, LUP Policies 5-15 and 5-21 call for minimization of parking lot and beach curfews and prohibition of restrictions on public parking that would adversely affect public access to beaches, trails, or other recreational lands. Projects which would result in impacts on public parking or otherwise propose curfews must evaluate impacts to lower-income users and evaluate mitigation such as the provision of off-site parking or an in-lieu fee to support offsetting public access projects in the City. The City-approved project includes overnight closure of a public beach access route, where access to an existing informal dirt parking lot at the western terminus of Redondo Beach Road would be blocked, and access to two future formal parking lots would be blocked if the project were allowed to proceed. The after-the-fact CDP approval also includes authorization of an existing, unpermitted sign which indicates that Redondo Beach is a day-use area

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<sup>18</sup> It should also be noted that the informal blufftop dirt lot at the western terminus would be closed off and restored to habitat as part of Coastside Land Trust's recently approved Wavecrest Coastal Trail Project, where bollards and cable barricades would be used to prohibit vehicle access to the restored area in perpetuity. Conditions of approval for the Wavecrest Coastal Trail Project also require the preparation, submittal and review of a security plan for the two new formal parking areas, and would address trash management, among other safety and security elements. Put another way, that prior approval would appear to countenance the types of issues alleged to be occurring and would explicitly address them. However, none of these factors were addressed in the City's gate/closure analysis.

only, deterring nighttime public access without full evaluation of the impacts to lower-income users or mitigation for such impacts. The City indicated in its approval that, because daytime access to the beach and blufftop areas would be maintained free of cost, the overnight closure of access along Redondo Beach Road would not affect lower income users. However, such a conclusion was not substantiated by any meaningful analysis or evidence, since LCP-required evaluations of access impacts and mitigation were not even undertaken.

Lastly, the principles of environmental justice outlined both in the Coastal Act and the LUP are not appropriately considered in the City-approved project. LUP Policy 5-3, directly ties in the minimization of barriers to public coastal access to environmental justice, where public access and recreation opportunities must account for the social, physical and economic needs of all people. The curfew signage and gate approved by the City further creates barriers to low-or no-cost coastal access amenities, which could disproportionately impact environmental justice communities.<sup>19</sup> In fact, historically, curfews in the U.S. have been used to uphold discriminatory policies.<sup>20</sup> Thus, this after-the-fact CDP approved by the City does not meet its own LUP provisions nor does it advance the goals or the principles of environmental justice.

In short, the LCP requires public access opportunities 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. This is particularly the case for any proposed restrictions that affect free and low-cost public access, like this case, where the road and parking and beach access that would be restricted under the City-approved project are all currently available to the public at all times free of charge. Such free/low-cost access is given a higher level of protection under the Coastal Act and the LCP, including because such restrictions in these kinds of cases can disproportionately negatively affect those least able to absorb these kinds of reductions in public access, which is an environmental injustice. The City-approved project would result in the overnight closure of a public beach access route, where neither the necessity nor the impacts of such a closure have been analyzed in the manner required by the LCP, and where neither potential alternatives nor mitigations have been analyzed or proposed in conformance with the LCP. Therefore, the appeal contentions raise a substantial issue as to whether the local CDP approval is consistent with the public access and recreation policies of the certified Coastal Act and the LCP.

## ***Conclusion***

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<sup>19</sup> In this staff report, the terms “underserved communities” and “environmental justice communities” are used interchangeably with the term “communities of concern.” All these terms refer to low-income communities, communities of color, and other populations with higher exposure and/or sensitivity to adverse project impacts due to historical marginalization, discriminatory land use practices, and/or less capacity to mitigate adverse impacts.

<sup>20</sup> Della-Piana, E., T. Ressler-Moyer, T. Larson, C. Bermudez, K. Herold, K. Samarrae, and S. Lew; “Cited for being in plain sight: How California polices being black, brown, and unhoused in public”; 2020.



When considering a project that has been appealed to it, the Commission must first determine whether the local government's decision on the project raises a substantial issue of LCP (and Coastal Act where applicable, like here) conformity, such that the Commission should assert jurisdiction over the CDP application 'de novo' (i.e., completely reviewing the project for LCP and Coastal Act consistency) for such development. At this stage, the Commission has the discretion to find that the project does or does not raise a substantial issue of LCP and/or Coastal Act conformance. Section 13115(c) of the Commission regulations provides that the Commission may consider the following five factors when determining if a local action raises a significant issue: the degree of factual and legal support for the City's decision; the extent and scope of the development as approved or denied by the City; the significance of the coastal resources affected by the decision; the precedential value of the City's decision for future interpretations of its LCP; and, whether the appeal raises only local issues as opposed to those of regional or statewide significance. The Commission may, but need not, assign a particular weight to a factor, and may make a substantial issue determination for other reasons as well. In this case, the five factors, considered together, support a conclusion that the City's approval of a CDP for the proposed project does raise a substantial issue of LCP and Coastal Act conformance.

In terms of the degree of factual and legal support for the City's decision, as detailed above it appears clear that the City did not fully complete, and its approval is severely lacking in, the kind of analyses that the LCP requires for a project of this sort (e.g., problem definition, alternatives, impacts, and mitigation analyses). Thus, this factor weighs in favor of finding substantial issue.

Second, with respect to extent and scope of the City-approved development, the proposed development is located on public road which is one of ten LCP-designated scenic coastal access routes in the City and which currently provides access to Redondo Beach, a long sandy beach characterized by picturesque bluffs and tide pooling opportunities, as well as informal trails along the blufftop which connect to existing trails to the north and south. Moreover, recently approved public access and recreation improvements in the immediate area would elevate Redondo Beach Road to a primary coastal access route as new public access amenities (such as two parking areas, a restroom and water fountain, bike racks, improved trails, and two vertical access stairways down to the beach) are completed. Thus, this proposed overnight closure represents a fairly significant development in terms of the scope of said development's impacts, now and in the future, that will significantly interrupt public access. Therefore, this second factor weighs in favor of a finding of substantial issue.

With respect to the significance of affected coastal resources, the project would impact public access along an LCP designated coastal access route. Maximizing public access to the coast is one of the most important policies embodied in the Coastal Act and the City's certified LCP, and the Redondo Beach and Wavecrest areas are highly valued as a public resource for both visitors and community members. In addition, as previously discussed, there are significant public access improvements proposed for the beach and bluff areas that will be completed pursuant to the City's Wavecrest Coastal Trail Project. Thus, this factor also weighs in favor of finding substantial issue.

Further, with regard to the fourth factor, the potential to set an adverse precedent for future interpretations of the LCP, it should first be noted that any one case, like this one, is decided on its specific facts and its specific merits and is not dispositive as to how subsequent CDP decisions will be made. That said, others often point to past decisions as precedential, and that could be the case here.<sup>21</sup> In that context, the subject project raises a fundamental question regarding how local governments and the Coastal Commission should balance valid public safety issues and concerns of local communities against the preservation and maximization of public access and recreation opportunities. In this case, the City has not adequately assessed the necessity of imposing access restrictions, nor have the impacts of such restrictions been assessed, nor necessary mitigation applied. The City's lack of findings in this case is concerning and raises the possibility that future decisions could similarly be based on insufficient evidence and analysis. Further, there are other similarly-situated gates in the City that are currently constructed, but not authorized by CDPs (see also "Violation" finding below), that are currently used to block public beach and other access along other routes in the City overnight, and future CDP decisions are likely to be framed in terms of this one. In other words, if the City's decision here were to stand, it could open the doors to similar development that would likely adversely impact public access at these other locations as well. As such, this factor weighs in favor of finding substantial issue.

Finally, as to the fifth factor, the City-approved project raises issues of regional and statewide significance associated with public access and recreation opportunities, including as understood through an environmental justice lens, and how best to best address public safety and community concerns while also maintaining and enhancing access as required by the Coastal Act and the LCP. Access to, and enjoyment of, coastal areas is not limited to the residents of coastal communities. Therefore, this factor supports a finding of substantial issue as well.

In this case, these five factors, considered together, support the conclusion that the City's approval of a CDP for this project raises a substantial issue of LCP and Coastal Act conformance. Here, and for the substantive reasons discussed in the findings above, the Commission finds that the City-approved CDP for the project raises a substantial issue of conformance with the certified Half Moon Bay LCP as well as the Chapter 3 public access and recreation policies of the Coastal Act. Therefore, the Commission takes de novo jurisdiction over the CDP application for the proposed project

### **G. Coastal Development Permit Determination**

The standard of review for this CDP application is the City of Half Moon Bay certified LCP and the public access and recreation policies of the Coastal Act.<sup>22</sup> All Substantial Issue Determination findings and previously cited LCP and Coastal Act provisions

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<sup>21</sup> And the City has some two other unpermitted gates that are currently used to block public beach and other access along other routes in the City (see also Violation finding below), where future CDP decisions regarding these gates/closures are likely to be framed in terms of this one.

<sup>22</sup> Per Section 30604 of the Coastal Act, all CDP decisions for development located seaward of the first public road and the sea must be evaluated against the Coastal Act's public access and recreation policies, whether located in the Commission's original or appeal jurisdiction.

above are incorporated herein by reference. As detailed in those findings, the proposed project is inconsistent with LCP and Coastal Act provisions related to public access, including as seen through an environmental justice lens, and has not adequately addressed LCP requirements to analyze public access impacts, discuss feasible alternatives, and mitigate for any unavoidable impacts of the development to public access. For those reasons, the LCP directs that the CDP application be denied. Although the Commission could attempt to craft terms and conditions to modify the project in order to create a Coastal Act/LCP-consistent project, the Commission is under no obligation to do so.<sup>23</sup> And, in fact, it is not even clear that there is a Coastal Act/LCP-consistent project associated with blocking the public from using the public road to access the bluffs and beaches here, and certainly the City has a lot of work to do if it intends to pursue such a project, as described herein. As such, it is not a good use of the Commission's scarce resources to attempt to solve such problems through the Commission's CDP process, and it will be up to the City if they decide to re-approach the situation. If so, the City is advised to complete a more rigorous examination of the safety complaints, and potentially present a modified proposal, along with a comprehensive LCP-required analysis. For all of the reasons identified in this report, the Commission denies the CDP application for the Applicant's proposed project.

## **H. Violation**

Violations of the Coastal Act and the City of Half Moon Bay LCP exist at the subject site including, but not necessarily limited to: (1) unpermitted installation of a gate on Redondo Beach Road; (2) unpermitted overnight closure of said gate between 1985 and approximately 2015; and (3) unpermitted installation of signage listing unauthorized beach curfew hours. This CDP application purports to address these violations by authorizing them after-the-fact. However, as described in detail above, the proposed retention of the gate and signage and proposed nighttime closure of the gate are inconsistent with the LCP and the Coastal Act. Therefore, denial of this application will result in violations remaining at the site. The matter has been referred to Commission's enforcement division to consider options for future action to address the violations.

It should also be noted that City Municipal Code Chapter 10.50 "Road Closures" includes provisions prohibiting vehicle access along Redondo Beach Road and Poplar Street west of Railroad Avenue between certain hours overnight, and directs signs and barriers be erected to bar vehicle access to the beach and bluffs.<sup>24</sup> A similar provision

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<sup>23</sup> This long-standing legal principle has been affirmed by multiple courts to directly apply to the Coastal Commission (see, for example, *LT-WR, L.L.C. v. California Coastal Comm'n* (2007) 152 Cal.App.4th 770, 801, citing *Bel Mar Estates v. California Coastal Commission* (1981), 115 Cal.App.3d 936, 942; *Reddell v. California Coastal Commission*, 180 Cal.App.4th 956, 180 Cal.Rptr.3d 383, 395 (2009), rev. denied (Mar. 24, 2010), citing *LT-WR & Bel Mar*, and *Kalnel Gardens, LLC v. City of Los Angeles* (2016) ("As the City points out, under *Kalnel's* reasoning the City was obligated to propose architectural design changes to the proposed project, a task beyond the reach of planning commissioners or City Council members.")).

<sup>24</sup> Section 10.50.010 states that: "It is unlawful for any motor vehicle to use Redondo Beach Road, or Poplar Street west of Railroad Avenue between the hours of six p.m. Pacific Standard Time (PST) and seven a.m. PST or eight p.m. Pacific Daylight Time (PDT) and six a.m. PDT each day, as provided herein, except for vehicles using said roads for access to residences. Signs shall be posted to warn drivers of the violation. A barrier shall be erected barring vehicle access to the beach and blufftop area

prohibits vehicular access along Wavecrest Road from sunset to sunrise.<sup>25</sup> However, and to be clear, these City Municipal Code sections are not part of the certified LCP, and have no relevance in a CDP application context. As such, the City can't rely on such provisions to argue for a CDP for the after-the-fact installation of the gate; the installation of signage restricting beach access; and overnight closure of the gate, all of which block public access. Additionally, any attempt to enforce the City's Municipal Code and block or limit public access in any way would constitute "development" requiring a CDP under the Coastal Act and the City's LCP. Any such development undertaken without a CDP would constitute another violation of the Coastal Act and City's LCP.

Finally, Commission staff are aware of similar violations at two other coastal access routes in the City. Wavecrest Road, approximately a half-mile north of Redondo Beach Road, is an LCP-designated primary coastal access route and provides connectivity between Highway 1 and the North Wavecrest area, where trails connect to the shore. An unpermitted gate was installed in or around 1985 approximately midway between Highway 1 and the western end of Wavecrest Road. Similarly, an unpermitted gate was installed in or around 1985 on Poplar Street, another primary coastal access route, just west of Railroad Avenue. An unpermitted sign was also installed adjacent to the gate on Poplar Street which reads "Day Use Only" and indicates that the public beach parking lot at the western end of Poplar Street is closed overnight. Both of these unpermitted gates are currently closed on a nightly basis, blocking public access to the beach and access amenities seaward of the closures. Enforcement staff will continue to evaluate enforcement options regarding these other Coastal Act violations as well.

Although development has taken place prior to the City's CDP action, consideration of this appeal by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act and the LCP. Commission review and action on this appeal does not constitute a waiver of any legal action with regard to the alleged violations (or any other violations), nor does it constitute an implied statement of the Commission's position regarding the legality of any development undertaken on the site without a CDP, or any other development.

## **I. California Environmental Quality Act (CEQA)**

CEQA Section 21080.5(d)(2)(a) prohibits a proposed development from being approved if there are feasible alternatives and/or feasible mitigation measures available that would substantially lessen any significant adverse effect that the development may have on the environment. The Commission's review, analysis, and decision-making process for CDPs and CDP amendments has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA (CCR Section 15251(C)).

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from each road between the hours cited hereinbefore. It shall be an infraction for any vehicle to stop or park beyond said barriers."

<sup>25</sup> Section 10.50.20 states that: "It is unlawful for any motor vehicle to use Wavecrest Road from sunset to sunrise each day, as provided herein. Signs shall be posed to warn drivers of the violation. A barrier shall be erected barring vehicle access to the beach and blufftop area from the road, from sunset to sunrise. It is an infraction for any vehicle to stop or park beyond the barriers.

Pursuant to CEQA Guidelines (14 CCR) Section 15042 “a public agency may disapprove a project if necessary in order to avoid one or more significant effects on the environment that would occur if the project were approved as proposed.” Section 21080(b)(5) of CEQA, as implemented by Section 15270 of the CEQA Guidelines, provides that CEQA does not apply to projects which a public agency rejects or disapproves.

Accordingly, the Commission finds that denial, for the reasons stated in these findings, is necessary to avoid the significant effects on coastal resources that would occur if the project was approved as proposed. Accordingly, the Commission’s denial of the project represents an action to which CEQA, and all requirements contained therein that might otherwise apply to regulatory actions by the Commission, do not apply.

### 3. APPENDICES

#### **A. Substantive File Documents<sup>26</sup>**

- City of Half Moon Bay CDP File PDP-24-052

#### **B. Staff Contacts with Agencies and Groups**

- City of Half Moon Bay Community Development Department, Planning Division
- Surfrider Foundation
- Coastside Land Trust

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<sup>26</sup> These documents are available for review from the Commission’s North Central Coast District office.