

CALIFORNIA COASTAL COMMISSION

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STAFF REPORT: REGULAR CALENDAR

Application No.:	5-25-0242
Applicant:	Pacific Airshow, LLC
Agent:	ESA Associates
Location:	Huntington City Beach (between Beach Blvd. and 7 th Street), Huntington Beach, Orange County (024-150-17; 024-150-16; 024-150-06; 024-281-14; 024-281-15; 024-281-16; and 024-281-02)
Project Description:	Privately ticketed 3-day airshow event along the public beach between 7 th St. and Beach Blvd. and portions of the Huntington Beach Pier (totaling approximately one square mile), for aircraft demonstration viewing, temporary infrastructure, temporary aircraft runway, concessions, restrooms, and other entertainment displays.
Staff Recommendation:	Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

The proposed project is a temporary airshow event to be held on Huntington Beach, encompassing an approximately one mile stretch of sandy beach, similarly sized area of the adjacent coastal waters, the Huntington Beach Pier, and public parking lots along Pacific Coast Highway. The airshow would take place over three days from October 3

through October 5, 2025, with admission to the venue open from 9:00 am to 6:00 pm. Aircraft flights will operate between 10:00 am and 5:00 pm of each event day, though additional aircraft flights will occur starting Monday, September 29 before the event's start as practice days for airshow performers. Installation of temporary infrastructure is planned to begin Tuesday September 23 and removal of all installations would conclude by Thursday October 9, 2025.

The primary area used by the event for on-the-ground activities is the Show Center Area, located approximately (from northwest to southeast) from south of the Huntington Beach Pier on the entire sand beach from 7th Street and Pacific Coast Highway to Beach Boulevard and Pacific Coast Highway. The Show Center Area consists of the beach, a portion of the Huntington Beach Pier, parking lots, commercial / restaurant uses, and bicycle and walking trails along Pacific Coast Highway. The Huntington Beach Pier would be used for additional paid seating and would be temporarily partially closed during the flight events due to safety requirements related to the airshow performance aerobatic box. Approximately 500 public parking spaces would be used by the applicant for private event parking, including both daytime parking and overnight RV parking, and various developments on the public beach and a general admission fee for a portion of the event. The proposed ticketed portion of the event temporarily precludes non-attending members of the public from using an approximately one square mile portion of the sandy beach where the temporary event perimeter is located, and one square mile of state waters for the aerobatic box during the flight activities. Therefore, special conditions are necessary to protect public access and recreation. As mitigation for public access impacts, the applicant proposes to provide at least 1,500 free tickets for each day of the event with priority for local students attending Title 1 schools and their guardians. As conditioned, the proposed temporary three-day event, plus setup and takedown, protects public access to the beach and sea.

The applicant, Pacific Airshow, has operated past airshows in Huntington Beach between 2016 and 2023 without receiving a CDP from the City of Huntington Beach or from the Coastal Commission. Following discussions between Commission staff and Pacific Airshow to discuss resolution for previous unpermitted development, Pacific Airshow agreed to the terms and issuance of a Consent Executive Director Cease and Desist Order (Consent EDCDO) on September 9, 2024, to authorize the 2024 Pacific Airshow. To resolve previously unpermitted airshows, the applicant has agreed to pay \$274,758 to fund several critical public access and resource projects at the Bolsa Chica Ecological Reserve (BCER) as part of this permit, which will be further discussed below.

Additionally, through the Consent EDCDO, the applicant was required to submit a complete CDP application for future airshows. After meeting with the applicant following the successful 2024 Airshow with improved public access, the applicant agreed to submit a complete application by December 31, 2024. However, the applicant did not submit an application to the Commission until March 18, 2025. Additional filing and submittal deficiencies resulted in an abbreviated window for analysis of the proposal which was intended to be avoided by a timely CDP application submission as agreed upon.. Thus, given the need for additional analysis of future airshow plans, Special Condition 1 limits the term of this CDP to a single event, to take place October 3

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through October 5, 2025, and requires that a new CDP or CDP amendment be submitted by the applicant for any future similar airshow events on this site.

Based upon the project plans and supplemental information submitted, staff recommends approval of only this year's event with a series of special conditions to minimize and mitigate the impacts of the proposed airshow and ground-activities and to ensure future applications for the Pacific Airshow event are submitted in a timely manner so that any less damaging environmental alternatives may be feasible. Commission staff recommend 21 special conditions to avoid creating hazardous conditions or any new long-term adverse impacts on public access and recreation, water quality, and/or marine birds and wildlife.

The proposed development will take place on state tidelands within the Commission's area of original jurisdiction, and, thus, the standard of review for this project is the Chapter 3 policies of the Coastal Act, and the City of Huntington Beach's certified Local Coastal Program (LCP) may provide guidance. Staff believes that the proposed project, as conditioned, minimizes impacts on coastal resources and is consistent with the Chapter 3 policies of the Coastal Act. Thus, Commission staff recommends that the Commission **APPROVE** coastal development permit application 5-25-0242 with the stated special conditions.

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EXHIBITS

[Exhibit 1 – Project Location and Vicinity Map](#)

[Exhibit 2 – Site and Staging Plans](#)

[Exhibit 3 – Consent Executive Director Cease and Desist Order](#)

[Exhibit 4 – Pacific Airshow Ticket Schedule \(2025\)](#)

I. MOTION AND RESOLUTION

Motion:

I move that the Commission approve Coastal Development Permit No. 5-25-0242 pursuant to the staff recommendation.

Staff recommends a YES vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the applicant or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the applicant to bind

all future owners and possessors of the subject property to the terms and conditions.

III.SPECIAL CONDITIONS

1. Duration and Scope of Permit. This coastal development permit shall authorize only the following development:

- A. The three-day airshow event that will take place from Friday October 3, 2025 to Sunday, October 5, 2025.
- B. Set-up and timely removal of those facilities necessary to stage the events, as set forth in the construction and removal plan submitted to the South Coast District office on June 10, 2025. Set up activities shall begin no earlier than September 23, 2025 and deconstruction and removal activities shall conclude no later than Thursday October 9, 2025.
- C. Activities that will occur in preparation of and during the airshow event:
 - 1. Flight familiarization and flight practice flyovers throughout the Airshow Performance Area beginning as early as Monday of the week of the Airshow leading up to the opening day (Wednesday, Thursday, or Friday);
 - 2. Airshow admission, venue, and festival areas that would be open from 9:00 AM to 6:00 PM;
 - 3. Civilian and military aircraft flybys and aerial acrobatics performances from approximately 10:00 AM to 5:00 PM each day.
 - 4. Demonstrations vehicle and aircraft displays, illustrations, flight simulations, sponsorship booths, merchandise tents, concessions, and food trucks that are located throughout the venue;
 - 5. Static aircraft, drone and other urban air mobility (UAM) technology displays, to occur within the Show Center Area during the hours of the Airshow;
 - 6. Freestyle motocross (FMX) and other action sports demonstrations to be generally located within the Seating/Activations Area during the hours of the Airshow;
 - 7. Sandcastle building competitions to occur within the Show Center Area during the hours of the Airshow;
 - 8. Art installations to be generally located throughout the Show Center Area;
 - 9. Scheduled passenger urban air mobility (UAM) vehicle / helicopter transport service to and from the beach parking lots (Area F) to local

airports throughout Southern California to take place each day of the event;

10. Science, Technology, Engineering and Mathematics (STEM) and other technology exhibitions throughout the event area.

- D. This permit is limited to those activities listed in this Special Condition No. 1 and does not authorize additional air events, concerts, or other events requiring a ticket to attend. Such events shall require a separate coastal development permit or a written determination from the Executive Director that no permit is required.
- E. The permittees shall undertake development in accordance with the approved plans. Any request for a change to the installation, operation, or removal schedule of the facilities shall be reported to the Executive Director. No changes to the approved final plans shall occur without an amendment to this coastal development permit unless the Executive Director determines in writing that no amendment is legally required.
- F. Authorizations for airshows after 2025 shall require an amendment to this CDP or a new CDP application, which must be submitted by December 31 of the year prior to the event seeking authorization.

2. Shoreline Public Access Plan. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval by the Executive Director a Shoreline Access Plan that shall, at a minimum, demonstrate compliance with the following requirements:

- A. Lateral public access below and along the seaward boundary of the sandy beach ticketed event area to the landward boundary of the sterile "aerobatic box," shall not be obstructed at any time. This provision of the public access plan, shall allow (i) adequate and necessary crowd safety separation during aircraft and parachute operations that occur in those areas and (ii) restrictions on the placement of chairs, umbrellas, coolers, or any other physical items within those areas during the aircraft and parachute operations that occur within those areas on the performance days of the Airshow for the protection of the parachutists, aircraft, personal property, and members of the public. The applicant shall condense the impacts from the aircraft operations in those areas to one hour near the beginning of each performance day and shall complete those aircraft operations in those areas by noon each day. Respondent shall ensure that disruptions to public access from parachute operations in those areas are minimal and last no more than 20 minutes per parachute display. The applicant shall post signage throughout the event and information on the event's website regarding the public access restrictions and safety concerns during these performances.

- B. Two vertical public access routes to the shoreline through the sandy beach ticketed event area shall be provided at all times. The vertical public access routes shall be maintained without obstruction by persons or property, such that free flowing access is not restricted.
- C. The applicant may employ reasonable security measures, including bag checks conducted by Airshow personnel and metal detectors and emergency measures deemed necessary in real time by security personnel and/or local state, and/or federal law enforcement. If emergency measures are needed, they will be applied to the entire event, not only the public access routes and shall be conducted in the manner that imposes the least burden on public access to adequately address the emergency and/or security threat. If additional security concerns arise prior to the Airshow, the applicant may provide Commission staff with documented security concerns from local, state, and/or federal law enforcement and military authorities, after which additional security measures may be authorized by the Executive Director or her delegate that may further restrict public access to the area.
- D. No changes to the Shoreline Access Plan shall be undertaken without an amendment to this coastal development permit or a written determination from the Executive Director that no amendment is needed.

3. Parking Management Plan. PRIOR TO ISSUANCE of this coastal development permit, the applicant shall develop and implement a Parking Management Plan in cooperation with the City of Huntington Beach and Orange County Transportation Authority (OCTA). The plan shall comply with the following requirements:

- A. The permittee's use of the Huntington City Beach Parking Lots, RV camping spaces, beach, and other event areas shall be limited to no more than 17 days, in accordance with the submitted construction and removal submitted on June 10, 2025, and shall comply with the Huntington Beach LCP and the Coastal Act.
- B. In order to minimize obstructions to public access outside the Airshow performance dates of October 4-6, during those nonperformance days public access through the beach staging area shall be allowed to the maximum extent practicable given safety and security considerations, but in any event shall include any vertical and horizontal access through the event area that will be provided during the performance dates as set forth in the public access plan. During those non-performance dates, security guards may provide security for the venue and equipment and materials placed in the staging areas, but may not deter the public access through the venue to the beach and the shoreline. During the placement of equipment or materials on the beach staging areas, reasonable restrictions for public safety may be imposed.

- C. Parking space utilization and rates for the event shall be consistent with or lower in utilization and/or price to the June 10, 2025, letter sent to the Commission by the applicant.

4. Traffic Management Plan. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the permittees shall submit a Traffic Management Plan (TMP) developed in cooperation with the City of Huntington Beach for the review and approval by the Executive Director. The plan shall consist of sign posting, detours, phased construction, and temporary driveways where necessary. The TMP shall specify implementation timing of each plan element (e.g., sign posting, detours). Adequate local emergency access shall always be provided to adjacent uses. Proper detours and warning signs shall be established to ensure public safety. The plan shall be devised so that construction shall not interfere with any emergency response or evacuation plans.

5. Boardwalk Access Management Plan. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit a Boardwalk Access Management Plan for review and approval by the Executive director. The Plan shall demonstrate that the temporary event facilities (tents, fencing, etc.) are sited so as not to interfere with the public's use of the Huntington Beach boardwalk that crosses the downtown shoreline area. If temporary closure of the boardwalk is necessary during installation or tear-down of equipment, a five-minute interruption of traffic on the pedestrian and bicycle route is authorized with a flagger to stop bicycle and pedestrian traffic.

6. Lighting Plan. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and approval of the Executive Director, a lighting plan to protect biological resources from light generated by the project. The lighting plan to be submitted to the Executive Director shall be accompanied by an analysis of the lighting plan prepared by a qualified biologist, which documents that the lighting plan is effective at preventing lighting impacts upon adjacent habitat. All lighting shall be directed and shielded so that light is directed landward, away from the ocean and sandy beach not occupied by the project. Furthermore, no skyward-casting lighting shall be used in excess of the minimum necessary for aircraft and boating safety requirements. The plan shall describe the aerobatic box buoy lighting designs, including the light direction, intensity, color, and strobing period. The lowest intensity lighting shall be used that is appropriate to the intended use of the lighting.

7. Fuel Dump Clean-Up Plan. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT the applicant shall submit for the review and approval by the Executive Director a Fuel Dump Clean-Up Plan to address the potential of a high environmental impact event of an emergency fuel dump from aircraft over coastal waters for safety reasons. The plan should outline response measures that the permittee shall take in response to all fuel dump incidents as well as any coordination with external emergency response authorities that is required, including but not limited to the U.S. Coast Guard.

8. Marketing and Media Plan. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval by the Executive Director a Marketing and Media Plan that ensures sufficient awareness of the event to the broader community. The plan shall include copies of all marketing and media materials already disseminated or proposed to be disseminated. The applicant shall specify any proposed locations of street-level promotions. Marketing and media materials shall be distributed beyond the City of Huntington Beach to neighboring underserved communities in the greater Los Angeles area and acknowledge the California Coastal Commission's role in providing public access at this location. Marketing efforts shall include posting of marketing materials at relevant transit stops. The permittees shall clearly and equitably distribute information that highlight the free tickets being made available to the public. The permittees shall also strongly encourage attendees to walk, scoot, bike, or take public transit to the event. The permittees shall undertake development in conformance with the approved marketing and media plan unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required.

9. Submittal of Final Plans

- A. Prior to issuance of the coastal development permit, the applicant shall submit, for the review and written approval of the Executive Director, two full-size sets of the following final plans:
 - 1. *Pacific Airshow 2025 Site Plans*, that substantially conforms with the plans submitted to the Commission, titled *Pacific Airshow 2024 Site Plans* dated October 1, 2024.
- B. The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

10. Community Benefits Package. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval by the Executive Director a Community Benefits Package that outlines free community activities that the event organizers shall undertake during the event:

- A. Provide at least 1,500 free tickets during each ticketed day of the event, made available to Title 1 school students and their guardians as proposed in the application. Additionally, remaining tickets shall be distributed to the general public with priority given to communities that have historically and currently limited opportunities for coastal access (such as, low-income individuals, neurodivergent, individuals with disabilities, and underserved youth). No more than 30 days following the conclusion of the event, the permittees shall submit to the Executive Director a report demonstrating compliance with this

condition, with accompanying evidence and documentation, which includes the number of free tickets that were distributed for each day, a list of any groups that were recipients of the free tickets and the number of tickets provided to each group, and a narrative explanation of the distribution of free tickets offered to the general public for each day.

- B. At least 100 of the minimum 1,500 free tickets shall be for pier seating to mitigate for the closure of the pier to the general public.

11. Pier Access. By acceptance of this permit, the applicant agrees to maintain public access to the Huntington Beach Pier when Airshow flying activities are not occurring (i.e. between the hours of 6pm and 8am). The applicant will provide sufficient signs that indicate the hours when the Pier is available to the general public.

12. Water Access. By acceptance of this coastal development permit, the permittee agrees to ensure public navigation of coastal waters in the vicinity of the event shall not be obstructed when Airshow flying activities are not occurring (i.e. between the hours of 6pm and 8am).

13. Volleyball Court and Fire Pit Relocation. The applicant shall work with the City of Huntington Beach to temporarily relocate all volleyball courts, and fire pits as necessary, within the Show Center Area to an adjacent location to the project site away from coastal hazards for the duration of the event, to be determined by the City of Huntington Beach. All volleyball courts and fire pits shall be returned to their previous location by 7 pm on the Thursday following the event (October 9, 2025).

14. Post-Event Public Access Report. WITHIN 30 DAYS OF THE CONCLUSION OF THE EVENT, the permittee shall submit a Post-Event Public Access Report to the Executive Director for review and approval describing how public access to the Huntington Beach Pier, the shoreline, bike paths, coastal waters, and other public spaces surrounding the event area was maintained or impacted throughout the event and documenting any incidents associated with the event that adversely affected public access. The report shall include data on attendance and parking, including but not limited to daily ticket sales by type and price. The report shall describe impacts to surrounding vehicular traffic that resulted from the event.

15. Construction Responsibilities and Debris Removal. The applicant shall not allow discharge of silt, debris, or construction materials into coastal waters as a result of this project. By acceptance of this coastal development permit, the applicant agrees that the permitted development shall be conducted in a manner that protects water quality pursuant to the implementation of the following BMPs.

- A. All construction materials shall be properly stored and contained so that these products will not spill or otherwise enter the coastal environment. No

construction materials, equipment, debris, or waste will be placed or stored where it may be subject to wave, wind, or rain erosion and dispersion.

- B. Staging and storage of construction machinery and storage of debris shall not take place on the beach.
- C. Any and all debris resulting from construction activities shall be removed from the beach and pier area on a daily basis and disposed of at an appropriate location.
- D. Divers shall recover non-buoyant debris discharged into coastal waters as soon as possible after loss.
- E. Erosion control/sedimentation Best Management Practices (BMP's) shall be used to control sedimentation impacts to coastal waters during project staging, demolition and construction. BMPs shall include a pre-construction meeting to review procedural and BMP guidelines. Methods to contain any leaks or spills shall be planned in advance, and any necessary equipment or supplies shall be readily accessible onsite. Any leaks or spills shall be immediately cleaned up.
- F. The applicant shall dispose of all demolition and construction debris resulting from the proposed project at an appropriate location outside the coastal zone. If the disposal site is located within the coastal zone, a coastal development permit or an amendment to this permit shall be required before disposal can take place.
- G. At the end of the construction period, the permittee shall inspect the project area and ensure that no debris, trash or construction material has been left on the beach or in the water, and that the project has not created any hazard to navigation.

16. Biological Monitoring Plan. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for review and written approval of the Executive Director a final detailed biological monitoring plan. The Plan shall be designed by a qualified biologist with knowledge of the local bird species and acoustic specialist for monitoring of wildlife disturbance within Bolsa Chica Ecological Reserve and/or Seal Beach National Wildlife Refuge (protected area) to measure noise levels and related impacts generated by the Pacific Airshow. The primary monitoring objective shall be to empirically measure and determine potential and realized impacts to birds using the protected areas. The Plan shall also address whether the sound levels and behavioral disturbances are the same as ambient conditions during a typical day when the proposed project is not occurring and determine links from any observed disturbances to the sound and/or presence of aircraft involved with the proposed project or other observed disturbances. The Monitoring Plan shall, at a minimum, include the following:

- A. A written agreement with staff at the selected protected area(s) to coordinate the dates and times for access to selected monitoring areas and monitoring activities within the monitoring plan;
 - i. For Bolsa Chica Ecological Reserve, the agreement shall include Department of Fish & Wildlife (CDFW) on-site staff and State Lands Commission (SLC) staff;
- B. A map with monitoring location(s) in the selected protected area(s) as well as in relationship to the official flight paths for the project;
- C. A table containing the dates and times of monitoring and a narrative explaining the selection of proposed dates and times. The minimum in-person, disturbance monitoring schedule shall include five separate monitoring events (calendar days): One event shall be in the 7 days prior to any project activities (pre-event), one event shall be during a training day in preparation for the project, two events shall be during the project, and one event shall be in the 7 days following the cessation of project activities (post-event). Each monitoring event shall be conducted at the same time each day for a minimum of 3 continuous hours per day during peak flight hours, when the highest concentration of event-related flights are to occur. The noise monitoring schedule shall include the same calendar days as the monitoring events. Noise monitoring shall occur, at a minimum, the entire time range that aircraft involved with the project are flying either in preparation for or during the project, for all monitoring events (e.g., if the longest time period project-related aircraft are planned to fly each day over the course of project preparation and duration is 10am-6pm, all noise monitoring during each monitoring event shall occur from 10am-6pm at a minimum). Ideally, noise monitoring should occur 24 hours on the date of those monitoring events.
- D. A narrative of the selected disturbance monitoring methods and protocols. Methods, including survey and monitoring design, should be clearly defined and selected from monitoring methods for birds and bird disturbance in the peer-reviewed or natural resource agency literature and provide sufficient detail to enable an independent scientist to duplicate them;
- E. A narrative of the selected noise monitoring equipment and protocols. The narrative shall include product information and associated documentation detailing the type and number of acoustic monitoring devices in each protected area that will be used to monitor the noise levels during monitoring. The noise monitoring equipment shall operate while in-person or disturbance monitoring is occurring and may operate unattended for additional acoustic data. The

monitoring methodology shall provide sufficient detail to enable an independent scientist to duplicate them;

- F. All reporting metrics shall be measured during all monitoring events. Reporting metrics shall include, but are not limited to,
 - i. The taxonomic families and/or species of observed birds, as well as their estimated counts. Where necessary, sensitive birds and/or birds most likely to be disturbed by the project activities should be prioritized for monitoring, at the discretion of the qualified biologist.
 - ii. Whether disturbed birds left the protected area, returned to the protected area, or otherwise demonstrated behavioral recovery from disturbance from project activities or ambient conditions;
 - iii. A count of for each flyover and number of aircraft flyovers over or adjacent to the protected area;
 - iv. The type of aircraft for each flyover should be identified to the extent feasible;
 - v. An estimated distance (elevation) of each flyover over or adjacent to the protected area. These distances may be binned for estimation purposes;
 - vi. Noise shall be recorded in units easily converted to and reported in dB(A). The ambient noise level as well as the noise level for each flyover and other sounds that correlate with avian disturbance shall be quantified and, where appropriate, binned;
- G. A narrative plan and methods for analyzing the disturbance and noise monitoring data. Methods for analyzing the monitoring data shall include clear technical rationale for their selection and be specified in terms of the type(s) of comparison, including whether and where normalized data is needed, and what monitoring questions are answered by the provided data analysis;
- H. Provision for a monitoring report due to the Executive Director no more than 60 days after the conclusion of project activities. The report must be prepared by a qualified acoustic specialist and a qualified biologist and address all of the monitoring data collected during the monitoring period. The report must document, analyze, and explain whether the monitoring data demonstrate the Pacific Airshow significantly impacts birds using the protected area(s), and the extent and magnitude of those impacts.
- I. Partnering Agencies and/or Subcontractors. The Permittee remains responsible for meeting all CDP terms and conditions, including funding the full

cost and implementing all measures to monitor project impacts to avian species inhabiting the respective protected area(s). If the permittee elects to enter into a binding agreement with a third-party agency or land management entity to carry out all or a portion of the Monitoring Plan requirements, the Permittee shall submit draft agreement provisions to the Executive Director for review and approval prior to finalizing such agreements.

17. Briefing Materials. By acceptance of this coastal development permit, the permittees agree to uphold the avian and sensitive species prevention guidance activities as submitted in their pilot participant briefing materials submitted June 10, 2025, as illustrated in [Exhibit 5](#). The daily pilot briefing shall include a request that aircraft not fly below 1,000 feet over the Bolsa Chica Ecological Reserve, and to the extent possible avoid the area entirely or fly at least 2,000 feet above ground level, and that operations use best efforts to avoid dropping streamers or other debris over the Bolsa Chica Ecological Reserve.

18. Single-Use Plastics Prohibited. By acceptance of this coastal development permit, the permittee acknowledges and agrees that the use of single-use plastic foodware and packaging on-site and for takeout is prohibited.

19. Water Quality.

- A. By acceptance of this coastal development permit, the permittees agree to remove and legally dispose of all trash, waste, oil, grease, and other materials that may be deposited within the event area incidental to public use of the Huntington Beach Pier, the beach, and adjacent parking facilities. The permittees shall surround all fuel storage areas with a double layer of sand or gravel bags to contain any fuel that is spilled and keep absorbent spill clean-up materials on hand in the event of a spill. The permittees shall develop and implement a program to collect and recycle beverage containers in coordination with the City of Huntington Beach.
- B. WITHIN 30 DAYS OF THE CONCLUSION OF THE EVENT, the permittees shall submit a Waste Management Report to the Executive Director that details the amount of waste (including trash, oil, grease, and other materials that may be deposited within the event area) produced by the event and implemented methods of disposal, and provides photographic documentation of the project site before and after the temporary event.

20. Assumption of Risk, Waiver of Liability, and Indemnity. By acceptance of this coastal development permit, the applicant acknowledges and agrees (i) that the approved development involves potentially hazardous activities; (ii) to assume the risks to the permittee and property that may be affected by this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold

harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

21. Mitigation Fee for Unpermitted Development. ON ACCEPTANCE of this Coastal Development Permit, the applicant shall pay \$274,758 to the California State Lands Commission for public access and habitat enhancement projects at the Bolsa Chica Ecological Reserve (BCER) to resolve unpermitted development. The payment shall be made to the account specified by the State Lands Commission and shall be paid in three payments: one payment of \$130,417.74 shall be paid by March 31, 2026, one payment of \$72,170.38 shall be paid by October 31, 2026, and one payment of \$72,170.38 shall be paid by October 31, 2027. A copy of the check shall be sent to the Commission, to the attention of Shelby Wayment at 455 Market Street, Suite 300, San Francisco, CA 94105.

IV. FINDINGS AND DECLARATIONS

A. Project Description and Background

Introduction and Project Location

The proposed project is a temporary airshow event, the Pacific Airshow Huntington Beach (hereafter named "Airshow"), that would take place on Huntington City Beach public beach, the Huntington Beach Pier, and public parking lots along Pacific Coast Highway between Beach Blvd. and 7th Street. ([Exhibit 1](#)). The event involves three (3) days of paid attraction and airshow viewing space.

The Airshow is located in the City of Huntington Beach. The Show Center Area is the location where primary on-the-ground activities of the Airshow will take place. The approximate boundaries of the Show Center Area from northwest to southeast would be 7th Street and Pacific Coast Highway to Beach Boulevard and Pacific Coast Highway to the Pacific Ocean. Portions of the public parking lots between 1st Street and Twin Dolphin Drive (totaling approximately 500 parking spaces) would be used for private event parking, both daytime parking and overnight RV parking, as well as temporary infrastructure staging. A ticketed satellite installation enclosing a portion of the western edge of the Huntington Beach Pier landward of the mean high tide line (MHTL) would include temporary seating and bars.

The Show Center Area consists of the beach, a portion of the Huntington Beach Pier, parking lots, commercial / restaurant uses, and bicycle and walking trails along Pacific Coast Highway. The Airshow Performance Area, the primary area for civilian and military aircraft flybys and aerial acrobatics, is located adjacent to the Show Center Area over the Pacific Ocean with an east-west length of approximately 3,000 feet from the shoreline and a north-south length of approximately 12,000 feet. A majority of the civilian and military aircraft flybys and aerial acrobatics occur within approximately 500

and 1,500 feet from the shoreline per Federal Aviation Administration (FAA) regulation. The Airshow Performance Area, or the aerobatic box, is identified by large inflatable marker buoys anchored in the ocean. However, many of the aircraft maneuvers, particularly for the military, spill out of the aerobatic box into the temporary flight restriction (TFR) airspace controlled by the Airshow. The TFR, as issued by the Southern California Terminal Radar Approach Control Facilities (SoCal TRACON) and the FAA for the Airshow, is a five nautical mile (NM) radius centered on the center of the Airshow's aerobatic box. The restricted airspace within the TFR ring extends from the surface to 15,000 feet above mean sea level (MSL). The Show Center Area and Airshow Performance Area collectively comprise of the Project Site (Exhibit 2).

According to the City's General Plan Land Use Plan, the Show Center Area is designated as OS-S Shore under the City's certified Land Use Plan. The Shore designation provides for coastal beaches operated by the City and state, and publicly or privately operated ancillary uses (e.g., food stands, recreational equipment rentals, and maintenance equipment storage). According to the City's Zoning Map, the Show Center Area is located within the Specific Plan Designation, Specific Plan 5, Downtown. The Downtown Specific Plan (DTSP) comprises a 336-acre area that extends from the intersection of Goldenwest Street and Pacific Coast Highway and curves along the coastline, including the Huntington Beach Pier landward of the mean high tide line, down to Beach Boulevard.

The downtown area of Huntington Beach, where the proposed event is located, is a popular coastal recreation area which provides the public with excellent coastal access opportunities and many different types of free and lower cost recreational activities. Throughout the year, visitors to Huntington Beach beachfront area can take advantage of the public Huntington Beach Pier, go fishing, sightsee, go along the coastal bicycle and pedestrian path, have bonfires in public fire pits, visit coastal parks and the public beach, or shop and eat in the downtown area. Many of these activities are free or lower cost visitor and recreational opportunities protected by Section 30213 of the Coastal Act.

Background

Pacific Airshow, LLC has held the Pacific Airshow annually in the City of Huntington Beach since 2016, with the exception of 2020, for three days over a weekend in September or October. Past airshows have featured aircraft flybys and aerial acrobatics from civilian and military aircraft, such as the U.S. Air Force Thunderbirds and U.S. Navy Blue Angels. Temporary Flight Restrictions (TFR) granted by the Federal Aviation Administration (FAA) that guide aircraft activity operating hours have typically lasted from 9:00 am to 5:00 pm of the event days, and practice flights over the area from participating aircraft may begin as early as the Monday before the event weekend. Participating aircraft for the most part operate from Joint Forces Training Base Los Alamitos Airfield (KSLI) in Los Alamitos and John Wayne Airport (SNA) in Santa Ana.

Past airshow event days, the Friday through Sunday portion that is ticketed, have typically run from 9:00 am to 6:00 pm. Past event activities have included vehicle and aircraft displays and demonstrations, flight simulations, sponsorship booths, merchandise tents, illustrations, concession, food trucks, bars, and overnight RV parking. In 2021, the airshow operators held a private party on the beach after the ticketed hours of the Friday and Saturday event days that included live music as part of a music festival, nighttime flyovers and parachute jump displays.

The event employs a mix of more than 300 paid staff and unpaid volunteers assisting with the event activities. The Huntington Beach Police Department (HBPD) are engaged as the lead public safety agency for the event and conduct foot and motor patrol, though other local, regional, and federal security and public safety agencies are involved with event operations. Private security is also employed by Pacific Airshow for crowd control, internal security, venue safety, and emergency response coordination with the HBPD. HBPD is also deployed to address traffic impacts from the event in the surrounding area. Past airshows have involved traffic impacts that include an emergency vehicle staging area along 1st Street, airshow staging equipment on Main Street between Walnut Avenue and Pacific Coast Highway, and the use of an auxiliary traffic lane for parking lot exit traffic along Pacific Coast Highway. Past shows have involved the closure of public parking lots along Pacific Coast Highway, including the Huntington Beach RV Campground, for private parking charged by the airshow operators for daytime and overnight RV parking.

The 2016-2023 Airshows did not receive a CDP from the City of Huntington Beach or from the Coastal Commission. Rather, previous Airshows were authorized as a temporary event through the City's Library Services Department. Commission staff first contacted the City of Huntington Beach in 2023, prior to the October 2023 Pacific Airshow, regarding the airshow's privatization of public land and waters without a requisite CDP. Commission staff unfortunately did not receive a substantive response from the City addressing Commission staff's concerns prior to the 2023 Pacific Airshow. Following the 2023 Pacific Airshow, Commission staff wrote directly to the Pacific Airshow and the City on February 21, 2024, regarding the airshow's privatization of public lands and water without a requisite CDP. Following that letter, Commission staff and the Pacific Airshow began to meet regularly to discuss possible resolutions, including the issuance of a Consent Executive Director Cease and Desist Order (Consent EDCDO).

The Pacific Airshow later agreed to the terms and issuance of the Consent EDCDO on September 9, 2024, which provided an interim permitting measure to improve public access leading up to and throughout the duration of the 2024 Pacific Airshow. In the Consent EDCDO ([Exhibit 3](#)), the Airshow agreed to provide horizontal public access seaward of the ticketed event area along the shoreline, in addition to two vertical public access routes through the ticketed event area to the shoreline. Further, the Airshow provided at least 100 free tickets during each day of the event to underserved youth and posted directional signage regarding public access throughout the event. Commission staff attended the 2024 event and confirmed that the Airshow complied with all terms of the Consent EDCDO. Through the Consent EDCDO, the Airshow also agreed to seek

Coastal Act authorization for any future Airshows, including by submitting a complete CDP application. In order to ensure sufficient time to analyze the event, Commission staff requested that a CDP application be submitted by December 31, 2024. However, the South Coast District Office did not receive the subject application until March 18, 2025, almost three months later.

Current Proposal

In response to the Consent EDCDO, the applicant is seeking a five-year authorization for the airshow, which would cover the 2025-2029 calendar years. The proposed Airshow event for 2025 would take place on October 3 to October 5, 2025, and would include the following elements within the coastal zone:

- Flight familiarization and flight practice flyovers throughout the Airshow Performance Area beginning as early as Monday of the week of the Airshow leading up to the opening day (Wednesday, Thursday, or Friday);
- Airshow admission, venue, and festival areas that would be open from 9:00 AM to 6:00 PM;
- Civilian and military aircraft flybys and aerial acrobatics performances from approximately 10:00 AM to 5:00 PM each day.
- Demonstrations and vehicle and aircraft displays, illustrations, flight simulations, sponsorship booths, merchandise tents, concessions, and food trucks that are located throughout the venue;
- Static aircraft, drone and other urban air mobility (UAM) technology displays, to occur within both the Show Center Area during the hours of the Airshow;
- Freestyle motocross (FMX) and other action sports demonstrations to be generally located within the Seating/Activations Area during the hours of the Airshow;
- Sandcastle building competitions to be generally located within the Seating/Activations Area during the hours of the Airshow;
- Art installations to be generally located throughout the Show Center Area;
- Scheduled passenger urban air mobility vehicle / helicopter transport service to and from the beach parking lots (Area F) to local airports throughout Southern California to take place each day of the event;
- Science, Technology, Engineering and Mathematics (STEM) and other technology exhibitions.

The Show Center Area of the event includes a number of event activities and offerings, including reserved seating and hospitality spaces, catering tents, food trucks,

merchandise booths, bars serving beer, wine, and spirits, public safety stations, security checkpoints, volunteer tents, portable restrooms, and trash facilities.

While this coastal development permit only authorizes that development set out above for the 2025 Airshow, Future airshows are anticipated to include additional new activities added to the annual events between 2026 and 2029 in addition to the activities planned for the 2025 airshow. Activities anticipated for future years include multi-day air racing within the Airshow Performance Area, a temporary runway installed in the Show Center Area, wave pool surf competitions, skateboard, BMX and/or freestyle motorcross (FMX) competitions and demonstrations, offroad vehicle ride and drive, beach camping, and pyrotechnics. However, these additional activities have not been proposed under the current CDP application.

B. Standard of Review

The proposed project is located partially within the City of Huntington Beach's Local Coastal Program (LCP) jurisdiction and partially within the retained jurisdiction of the Coastal Commission. Coastal Act Section 30601.3 provides the Commission with the authority to act upon a consolidated permit for projects that require a coastal development permit from both a local government with a certified local coastal program (LCP) and the Commission. This authority is triggered if the applicant, local government and Executive Director (or Commission) consent to consolidate the permit. On March 18, 2025, the City of Huntington Beach, with the consent of the applicant and Executive Director, agreed to consolidate permit action for aspects of the proposed work that would be carried out in the City of Huntington Beach's LCP jurisdiction with aspects that would be carried out within the Commission's retained jurisdiction, consistent with Coastal Act Section 30601.3. The standard of review for such consolidated permits is consistency with the Chapter 3 policies of the Coastal Act, with certified LCP policies serving as guidance.

C. Unpermitted Development

Violations of the Coastal Act have occurred on the subject site without the required coastal development permits, including, but not limited to, the closure of state tidelands and waters, portions of Huntington Beach City Beach, the entire Huntington Beach Municipal Pier, Huntington Beach City Beach public parking spaces, and Huntington Beach City Beach public RV camping spaces during past Pacific Airshows, which obstructed public access to these areas. Further, past Pacific Airshows negatively impacted migrating birds at nearby wetlands due to flightpaths, including at the nearby Bolsa Chica Ecological Reserve (BCER).

The first Pacific Airshow was held at this approximate location in 2016, and no coastal development permit was obtained for that airshow or future ones, until 2025, as described above. The Pacific Airshow has been held every year since 2016, with the exception of 2020, which was cancelled due to COVID-19 government closures. After

numerous cooperative meetings with Commission staff, the Pacific Airshow agreed to the issuance and terms of the Consent Executive Director Cease and Desist Order (EDCDO) issued on September 9, 2024, which provided an interim permitting measure to improve public access at the 2024 Pacific Airshow (See [Exhibit 3](#)). Through the EDCDO, the Pacific Airshow also agreed to seek Coastal Act authorization for future Airshows, including submitting a complete CDP application. This CDP application submission is in fulfillment of that requirement.

In order to address the Commission's claims for monetary penalties, and in an effort to reflect any adverse impacts resulting from unpermitted development related to past Pacific Airshows, the applicants have agreed to pay a cash payment of \$274,758. This amount was calculated on and reduced in amount in part based on their agreement to resolve the liabilities for the unpermitted airshows conducted in prior years consensually in this context, without requiring a separate enforcement proceeding. These funds will be used to fund critical public access and habitat enhancement projects at the nearby Bolsa Chica Ecological Reserve (BCER), including public access trail improvements and a project to improve water quality at the Reserve. This amount is based, in part, off the fact that the event itself has typically taken place annually over a three-day period since the first Pacific Airshow in 2016 with the exception of 2020 when there was no airshow, and 2021 when the show was truncated.

The payment shall be paid according to the schedule listed in **Special Condition 21** to the State Lands Commission (SLC) to address public access trail repairs, erosion that has been exacerbated from past winter storms, water monitoring, and creek pump repairs. These specific projects have been chosen by the SLC and the California Department of Fish and Wildlife to address some of the highest priority needs at the BCER, including public access improvements. While there is no way to fully replace the period of lost public access during past Pacific Airshow, these projects will provide additional public benefits by restoring dangerously eroded trails at an area that was impacted by the unpermitted development.

If the previous years of unpermitted development are mitigated through the Pacific Airshow's funding of public access and habitat enhancement projects at the BCER within the schedule described above, these Coastal Act violations regarding unpermitted development at prior airshows will be resolved.

Consideration of the permit application by the Commission has been based solely on consistency of the proposed development with the policies of Chapter 3 of the Coastal Act. Approval of this application pursuant to the staff recommendation, issuance of the permit, and the applicant's subsequent compliance with all terms and conditions of the permit, including **Special Condition 21** will result in resolution of the above-described violations. Commission review and action on this permit 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 the development undertaken on the subject site without a coastal permit, or of any other development, except as otherwise expressed herein. In fact, approval of this permit is

possible only because of the conditions included herein, and the applicant's presumed subsequent compliance with said conditions, and failure to comply with these conditions in conjunction with the exercise of this permit would also constitute a violation of this permit and of the Coastal Act. Accordingly, the applicant remains subject to enforcement action just as it was prior to this permit approval for engaging in the unpermitted development described herein, unless and until the conditions of approval included in this permit are satisfied.

D. Public Access and Recreation

The exclusive use of a segment of public beaches by the promoters and operators of special events, and the associated limitations on public access and recreation, has long been an issue of prime importance to the Commission. The following Coastal Act policies protect the public's right to public access and recreation opportunities:

Section 30210 of the Coastal Act states:

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 30213 of the Coastal Act states:

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

Section 30220 of the Coastal Act states:

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

Section 30221 of the Coastal Act states:

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 30604 of the Coastal Act states, in part:

(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.

Huntington Beach is unique in that it consists of a particularly wide stretch of sand located directly adjacent to the City's downtown area, as well as expansive public parking facilities offering access to the beach and nearby visitor-serving facilities. The City regularly hosts large events and activities, including annual beach volleyball events, and the annual US Open of Surfing. The Huntington Beach Pier serves as a prominent landmark for Huntington Beach where visitors can enjoy walking, fishing, scenic views, and dining at the restaurant located at its end.

As detailed above, the proposed project is a temporary airshow event that will be located on the sandy beach. During an approximately 17-day period from setup to takedown of this year's event (September 23-October 9, 2025), an approximately one-mile stretch of sandy beach, the pier, and public parking lots immediately upland of the sandy beach will be developed with temporary fencing and other structures that will restrict the general public from use of the entire beach and disproportionately impact underserved populations. Tickets for the event start at \$45 for adults and children 3 and older, while VIP ticket options start at \$200 and can go higher ([Exhibit 4](#)).

The primary Coastal Act issue raised by this project is the impact that the proposed Airshow would have on public access to Huntington City Beach. The proposed event boundary would result in two significant coastal access impacts. First, the event would temporarily privatize the large portion of enclosed sandy beach that the public would otherwise have free recreational access to for a three-day period. Second, the project would significantly restrict both vertical access to the ocean from the land, and lateral access of the shoreline along the water. Section 30211 of the Coastal Act codifies the public's interest in retaining access to sandy beach both vertically and laterally and requires that development does not interfere with the public's access to the shoreline.

The applicant has insisted that the temporary restriction of coastal access during the event is necessary for public safety and security needs pursuant to Section 30212(a) of the Coastal Act. As evidence to their argument, the applicant provided a third-party public safety study outlining different types of public safety incidents that have occurred during previous airshows and other similar events, concluding in its recommendation that there should be no unmitigated access to the beach during the proposed airshow. In recognizing that public safety is of paramount importance for an event of this size, the Commission accepts that, for vertical and lateral shoreline access to persist during the event, some security measures will need to be placed on this movement. The Commission will allow the applicant to implement security measures that will result in some restrictions in lateral and vertical access during the event. To prevent significant risks to public safety while enabling shoreline access to be maintained, the Commission imposes **Special Condition 2** requiring the applicant to prepare a shoreline access plan. The shoreline access plan requires the event to allow for horizontal shoreline and at least two vertical accessways, but would allow the applicant to manage security along entry points using metal detectors, bag checks, or similar security features. The plan would also allow the applicant to respond to emergencies during the event as necessary and also coordinate with the Executive Director to restrict access as part of emergency

response measures as necessary if a credible security threat is established prior to the event. Further, while the Commission was not made aware of any known security threats to the 2025 airshow at this time, should the airshow operators become aware of any threats the plan allows for them to undertake necessary security measures.

The project also proposes to occupy a portion of the Huntington Beach Pier for ticketed private viewing seats during the airshow. The seating area would run from the base of the pier near the Huntington Beach Bike Trail to the mean high tide line (MHTL) on the southeastern face of the pier, leaving a 15 foot emergency buffer between the seating area and northwestern pier edge. This closed-off area of the pier for the event would have several hundred temporary seats for purchase, umbrellas, tables, and two alcohol-serving bars. While the originally submitted application materials stated that the event pier area would not result in additional restrictions to public access of the pier, correspondence with the applicant on July 31, 2025, indicated that it was their intention to close off public access to the end of the pier seaward of the seating area during event activity. This closure constitutes a significant restriction of public access and recreation opportunities offered by the pier, where visitors can typically freely access scenic views, recreational fishing, and dining opportunities. The applicant provided additional information justifying the closure for compliance with FAA regulations to restrict access within an airshow's aerobatic box, which for the Pacific Airshow includes this portion of the Huntington Beach Pier seaward of the MHTL. During the proposed airshow, unauthorized persons and vessels would be prevented from accessing the pier or coastal waters within the aerobatic box. The portion of the pier over coastal waters is managed by the SLC, and the applicant has indicated they are seeking authorization for the usage and closure of this area for the event.

An attendance survey provided by applicant from the 2022 Pacific Airshow estimated that 690,000 people attended the 2022 event in Huntington Beach, of which 79 percent were non-local visitors. The applicant proposed to distribute at least 1,500 free tickets for each event day as mitigation for public access impacts. **Special Condition 10** is imposed to require this number of tickets to be distributed for each airshow event and describes priority considerations that should be given to students of Title 1 schools in the community and their guardians with the remaining tickets to be distributed to the general public. Further, to ensure that the access restrictions caused by the aerobatic box are minimized, **Special Condition 11** and **Special Condition 12** are imposed to require the applicant to restore access to the pier and coastal waters in the hours when aircraft are not operating in the area for the event.

Huntington Beach beaches are dotted with both public fire pits and volleyball nets, including in the vicinity of the proposed event area. **Special Condition 1** is imposed by the Commission to ensure that any fire pits or volleyball nets that could be in the project area and affected by the activity would be temporarily removed and replaced follow the event's conclusion.

The submittal of the applicant's application several months later than requested in the Consent EDCDO in 2024 and a lack of specific development details provided in the event plans hindered the Commission's capacity to completely evaluate mitigation efforts for the proposal's public access impacts, and as such the Commission is imposing **Special Condition 13** to require the applicant to analyze impacts on access and document incidents where public access was adversely affected due to event operations and to provide attendance data that could be used to inform future event mitigation plans. These and other persistent access concerns created by the event lead the Commission to impose **Special Condition 1** that limits the term of this authorization to only the 2025 airshow.

The applicant has expressed its intent to continue to produce the Pacific Airshow in the future and in the same location. There are a number of other potential new activities that the applicant has alluded to offering in future airshow events between 2026 and 2029. Because these activities are conceptual in the current state of project plans and subject to change based on their implementation in future events, their potential coastal resource impacts will correspondingly depend on the specific plans that would be prepared in advance of their inclusion in future airshows. **Special Condition 13** imposed by the Commission requires the applicant to seek an amendment to this Coastal Development Permit before new potential activities are allowed as part of the proposed development, to allow for the complete analysis of coastal resource impacts based on revised project plans.

Applicants are regularly required to acknowledge inherent hazards and agree to waive any claims of liability on the part of the Commission for allowing potentially hazardous development to proceed. This allows for potentially hazardous development or events to occur while avoiding placing the economic burden for damages onto the people of the State of California. Accordingly, this approval is conditioned for the applicant to assume all risks for developing at this location (**Special Condition 20**).

Final Site Plans

In their submission of materials, the applicant provided plans for the airshow event site for the previous 2024 airshow event site along Huntington Beach and the Huntington Beach Pier. Because the final site plans for the 2025 airshow have the potential to significantly vary from those of past years, including with different perimeter fencing and activity placement designs, impacts to coastal access and recreation may also change relative to the design of the event area. To ensure that final design of the event venue does not adversely affect public access, the Commission imposes **Special Condition 9** which requires the applicant to submit final site plans for the review and approval of the Executive Director before issuance of the permit.

Environmental Justice

Throughout California's history, low-income communities and other marginalized populations have faced disproportionate burdens in accessing the coastline due to geographic, economic, social, and cultural barriers. Ensuring equitable public access to the coast is consistent with the recreational access principles reflected in the Coastal Act (Sections 30210 and 30213), and the Commission has the authority to consider environmental justice, or the equitable distribution of benefits, when acting on a CDP (Section 30604(h)). The event is located in Huntington Beach, a popular recreation location for the greater Orange County area. These communities are inland to this beach, and many of which are considered low-income.¹ For example, communities in Costa Mesa, Fountain Valley, Santa Ana, Long Beach and Westminster. Furthermore, a number of neighborhoods within Huntington Beach, including Oak View, Goldenwest, and Newland, are considered in poverty or low-income areas.² For many of these communities, the closest beach for recreation is Huntington Beach due to proximity or because of Orange County Transit Authority coverage. Commission staff met with a local community leader who highlighted the importance of access for these neighborhoods to the event, citing unfulfilled past promises of free attendance by event organizers. Therefore, the proposed temporary exclusion for a of the public from an approximately one mile stretch of public beach for a private event may disproportionately affect individuals from these low-income communities. Many of these individuals are transit-dependent or may not have access to alternate low-cost modes of transportation to access the coast or other coastal areas (i.e., many of these communities primarily use Huntington Beach as their principal location for coastal access and recreation). This impact raises environmental justice and equitable access concerns with both Sections 30210 and 30213 of the Coastal Act. Exclusion of the public from approximately one square mile of the beach in order to hold a three-day private event for which admission will be between \$45 and over \$200 does not maximize access or recreational opportunities for all people (Section 30210), nor does such a pricing structure for this concert event constitute a lower-cost visitor or recreational opportunity (Section 30213).

Although the proposed event can create barriers to coastal public access for low-income communities, the impacts can be reduced because: (a) the event is temporary – the paid event is only three days; and (b) the applicant has made an effort to remediate

¹ Per AB 1550 which identifies low-income households or communities according to this definition: "Low-income communities" are census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093.

² CDBG Eligible Block Group Maps (2024)
[https://www.huntingtonbeachca.gov/Documents/Departments/Community%20Development/Affordable%20Housing/Eligible%20Area%20Maps/CDBG%20Eligible%20Block%20Group%20Maps%20\(2024\).pdf](https://www.huntingtonbeachca.gov/Documents/Departments/Community%20Development/Affordable%20Housing/Eligible%20Area%20Maps/CDBG%20Eligible%20Block%20Group%20Maps%20(2024).pdf)

these impacts by proposing to provide 1,500 free tickets per day disseminated to the public with priority for students of Title 1 schools and their guardians, as well as low-income groups and communities that face greater barriers to accessing the coast. The applicant is further considering to provide free activity portions of the event area that could include some portions of the planned activities, such as hosting a sandcastle competition and STEM education booths. These public access mitigation efforts are memorialized by the Commission imposing **Special Condition 109** outlining the community benefits package provided by the applicant and amended by staff.

Parking and Traffic

The crowds generated by the proposed event will temporarily impact some beachgoer's ability to find a parking space near the beach. The Commission has found that in many coastal beach locations a direct relationship exists between the provision of adequate parking and availability of public access to the coast. The site of the proposed event has several high-capacity public parking lots situated nearby along Pacific Coast Highway. The proposed project would include the closure and usage of approximately 500 of the public parking spaces provided in these public lots for paid daytime event parking, overnight RV parking, and equipment staging space. The applicant notes that there are over 6,500 parking spaces in the vicinity of the project from the City of Huntington Beach and Huntington State Beach, though it is unclear how far these spaces may be distributed from the site.

The impact to visitors of the privatization of the public parking spaces would primarily be through the elevated fees charged by the event. These fees are currently estimated to be approximately \$50 for daytime parking, though this is subject to finalization of a parking scheme agreement between Pacific Airshow and the City of Huntington Beach, to determine the parking rate and revenues shares to both parties. Parking fee rates for beach parking in the City otherwise typically range from \$15-\$30. Significant impacts to otherwise low-cost visitor serving could result from the overnight RV parking fees proposed to be charged by Pacific Airshow in the otherwise public parking lot. The fees for overnight RV parking at the event starts at and exceeds \$4,500 for four nights, running from Thursday October 2 till Monday October 6, 2025, according to the Pacific Airshow ticketing website.³ To ensure that public access is not significantly impacted by the occupation of public parking areas and potentially exorbitant parking fees, the Commission imposes **Special Condition 3** for the applicant to submit a parking management plan covering all parking plans for the event.

The crowds generated by the event will temporarily impact traffic in the downtown Huntington Beach area. The proposed project will follow the same traffic impacts as past years which include an emergency vehicle staging area along 1st Street, airshow staging equipment on Main Street between Walnut Avenue and Pacific Coast Highway, and the use of an auxiliary traffic lane for parking lot exit traffic along Pacific Coast

³ See <https://rv.pacificairshow.com/event-details/2025-pacific-airshow-rv-camping>

Highway. Traffic resulting from the event has the potential to affect visitors' access to the coast not associated with the airshow. **Special Condition 4** requires the development and implementation of a traffic management plan to minimize the impacts to travel outside of the proposed event on public access to the beach.

Huntington Beach is easily accessible by pedestrian and bike paths that extend along the coastline, and there are a number of public transit systems that stop in the downtown Huntington Beach area. The proposed airshow event has installations on either side of the Huntington Beach Bike Trail, on both the sandy beach and in the public parking lots along Pacific Coast Highway. **Special Condition 5** requires the applicants to site and operate the event so as not to interfere with the public's use of the east-west regional bicycle and pedestrian route that crosses the downtown Huntington Beach area. In addition, **Special Condition 8** requires the applicants to submit a final Marketing and Media Plan to the Executive Director that would, in part, encourage attendees to use alternative transportation to access proposed event.

Conclusion

As conditioned, the Commission finds that the development will not produce any long-term adverse impacts on public access and recreation and is consistent with the public access and recreation policies of the Coastal Act. The Commission will continue to evaluate public access issues identified during a 2025 airshow when analyzing any future airshows and will consider expansion of mitigation measures as shown to be necessary.

E. Biological Resources

Section 30107.5 of the Coastal Act defines Environmentally Sensitive Area as follows:

"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240 of the Coastal Act states:

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- (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.

The proposed event would take place on sandy beach adjacent to coastal waters with aircraft displays centered over the open waters of Huntington Beach (**Exhibit 1**). Coastal Act section 30240(b) requires development that is adjacent to ESHA and parks and recreation areas to be sited and designed to prevent significant degradation of those areas. There are no sensitive species known to be established in the sandy beach area of the project site; however, nighttime lighting and loud noises, including from jet aircraft and amplified sound, can disturb birds and other species living in the coastal and marine environments surrounding the proposed airshow event.

While the ground activity associated with the airshow is sited along the public beach and pier of Huntington Beach, the aircraft serving as a pivotal component of the event will be present and active in the Temporary Flight Restriction (TFR) area extending 5 nautical miles around Huntington Beach, as well as in flight paths connecting the TFR to numerous airfields in Southern California. Within the TFR and along flight path corridors extending to John Wayne Airport and Los Alamitos Joint Forces Training Base are a number of nature reserves and preserves, including Bolsa Chica Ecological Reserve and Seal Beach National Wildlife Refuge.

The Bolsa Chica Ecological Reserve is an approximately 1,400-acre coastal estuary, connected to the ocean through the tidal inlet at the southern end of the Bolsa Chica, about 800 feet north of Seapoint Street and fully located within the airshow 5 nautical mile TFR. Habitats include open water, mudflats, salt marsh, coastal dunes, seabird nesting islands, riparian, and freshwater marsh. More than 200 avian species have been identified at Bolsa Chica. The Bolsa Chica Ecological Reserve (BCER) is one of the largest wetland ecosystems remaining in California. The Bolsa Chica Conservancy (BCC) provides wetlands education programs for the public. In 2017, the BCC served 54,000 students, visitors, and volunteers. Annually, an estimated 90,000 visitors enjoy outdoor nature viewing, hiking and multiple educational programs hosted by BCER's three non-profit organizations (BCC, Amigos de Bolsa Chica, and the Bolsa Chica Land Trust).

With five plant communities, and its use as a rest stop for migratory birds, nursery for marine life, and haven for rare and endangered species, the Reserve abounds with a multitude of wildlife. Rare and sensitive bird species that are known to occur in the Reserve include Belding's savannah sparrow, burrowing owl, Ridgway's rail, and

western snowy plover. Some of the many other species of birds that use the area include various types of herons, egrets, terns, and raptors such as white tailed kites, northern harriers, osprey, and a variety of hawks. The reserve is very popular with birders and photographers.

Due to the proximity of the ESHA and wetlands of the BCER, and their known use by a great variety of birds, protection of birds must be assured. Species such as the western snowy plover, a federal listed endangered species, may nest into late September, when airshow associated aircraft operations can be expected to begin in preparation for the event weekend in early October. Although BCER is not directly incorporated as part of the project site, it is located within the flightpath between the Los Alamitos Joint Base station and the aerobatic box where a majority of the in-air activities would take place. If the aircraft fly at too low of an altitude, they could interfere with bird species through flushing actions.

Section 30240 requires that environmentally sensitive habitat areas be protected against any significant disruption of habitat values. It is important to assure that the proposed development not interfere with potential nesting bird ESHA. In order to prevent interference with breeding birds, certain steps must be incorporated into the proposed project. These steps include information dissemination amongst participating pilots and biological monitoring of sensitive areas. The applicant has stated that they will request that aircraft avoid overflights of the BCER to the maximum extent feasible, and would limit overflight to 1,000 feet when unavoidable. In previous Airshows, the applicant has provided all participating pilots with pre-flight safety briefing materials reflecting these requests during a mandatory pre-show briefing meeting;; the mandatory pre-show meeting and briefing materials will be used for this year's event as well. To memorialize the applicant's avoidance measures, the Commission imposes **Special Condition 17** requiring the applicant to conduct the safety briefing for pilots with these explicit requests.

The applicant has also proposed to propose biological monitoring at BCER before the Airshow and during the Airshow pursuant to the following biological mitigation measures outlined in the event's draft EIR:

Mitigation Measure HAZ-1: A qualified avian biologist will conduct one Wildlife Hazard Site Visit (WHSV) prior to the start of the each annual Airshow (beginning in 2025) following the protocol developed by the FAA in the Protocol for the Conduct and Review of Wildlife Hazard Site Visits, Wildlife Hazard Assessments, and Wildlife Hazard Management Plans (Federal Aviation Administration, Advisory Circular 150/5200-38, August 2018 to evaluate potential risk of wildlife strikes at airports, specifically for the proposed temporary aircraft landing pad on the beach during all future Airshow events. The WHSV shall include field observations conducted over one day at dawn, noon, and dusk from a variety of pre-determined locations to ensure complete visual coverage of the location of

the temporary runway and immediate surroundings. All signs of birds, mammals, habitat attractants, and wildlife/habitat relationship observations shall be recorded. A wildlife hazard site visit memorandum shall be prepared and include a list of wildlife species or signs observed during the surveys, federal and state status of the species observed, habitat features that may encourage wildlife, natural and artificial wildlife attractants, strike data analysis, and recommendations to reduce wildlife hazards. Recommendations may include developing a long-term management strategy that includes wildlife hazard management and/or reduction in flights under 500 feet above ground level.

Mitigation Measure HAZ-2: A qualified biological monitor will be on-site during event performances for the duration of the event (3-5 days) to document bird activity during aircraft flyovers and take-off and landing within the Show Center Area. Biological monitoring will also inform the recommendations to reduce wildlife hazards. Based on monitoring observations, recommendations may include following standard best management practices such as properly disposing of trash to avoid attracting wildlife to the Show Center Area and/or employing means of harassment (e.g., lasers) to disperse birds.

Before each airshow, wildlife monitoring will begin in the BCER and will be carried out across each day of airshow-associated aircraft flying activity. Monitoring is expected to identify the incidence and severity of noise impacts caused by the airshow flying activity. After a post-event survey, a report shall be submitted to Executive Director following each airshow that documents disturbances caused to reserve wildlife, as well as potential provisions for future mitigation measures to address any observed significant impacts to birds. To ensure all monitoring procedures are sufficient to evaluate and address wildlife impacts, the Commission imposes **Special Condition 16** requiring the applicant to submit for the review and approval of the Executive Director a final biological monitoring plan before the airshow.

These measures are necessary to find the proposed development consistent with Section 30240's requirement to protect against significant disruption of ESHA by avoiding impacts to sensitive nesting birds, and generally to sensitive bird use of the area. Special Condition 15 imposes these requirements which are necessary to assure that adverse impacts to nesting bird species in the Bolsa Chica Ecological Reserve are avoided.

Conclusion

As conditioned, the development will not result in significant degradation of adjacent habitat or impacts to biological resources and is compatible with the preservation of those resources. Therefore, the Commission finds that the project, as conditioned, conforms with Section 30231 and Section 30240 of the Coastal Act.

F. Marine Resources and Water Quality

The following Coastal Act policies protect marine resources from the effects of polluted runoff:

Section 30230 of the Coastal Act states:

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231 of the Coastal Act states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30240(b) of the Coastal Act states:

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.

The proposed event will occur in a location where there is a potential for a discharge of polluted runoff from the site into coastal waters. The spilling of fuel, debris, or waste onto the beach or in a location where it could be carried into coastal waters would result in an adverse effect on the marine environment. In order to reduce the potential for adverse impacts to water quality, the Commission imposes **Special Condition 19** requiring the appropriate storage, handling, and disposal of fuel, waste, oil, grease and other materials, and **Special Condition 18** to prohibit the use of single-use plastics that pose particular risk of contributing to marine debris. **Special Condition 19** also requires the applicants to submit a Waste Management Report that details the waste generated by the event and any waste management measures implemented. As conditioned, the Commission finds that the development conforms with Sections 30230 and 30231 of the Coastal Act. To further protect water quality, **Special Condition 15** is imposed, which identifies additional construction related measures to be incorporated into the project

during construction of temporary event facilities. These measures include methods for the appropriate storage and handling of construction equipment and materials to minimize the potential of pollutants to enter the coastal waters.

The project proposal identifies that there is the possibility of a “low probability, potentially high impact event of an emergency fuel dump” from aircraft participating in the airshow that results from emergency safety maneuvering. The application states that if dumped at significant altitude, upwards of 90 percent of the expelled aviation fuel dumped will typically evaporate before hitting the surface. Though this depends on a variety of factors including fuel volume, altitude, fuel chemistry, and air temperature, and many estimates for the evaporation rate of aviation fuel assume a dumping altitude several times higher than the low altitudes typical of airshow flight displays, which can be as low as just 500 feet above the ground. With the airshow’s aerobatic box situated offshore over coastal waters, there is a significant risk that any fuel dumps that could result from the airshow would lead to some amount of aviation fuel entering coastal water. The applicant provides the example of a naval 2,000 gallon fuel capacity F/A-18 naval jet dumping half of its fuel due to an emergency, which with a 10 percent non-evaporated fuel rate would result in 100 gallons of jet fuel potentially spilling into the ocean. The project’s EIR insufficiently evaluates the severity of such an event, stating that dispersion would minimize impacts because the exposure could last less than a week, and as such does not propose mitigation measures. To protect water quality and marine resources from the possibility of such significant albeit rare petroleum spill event, and ensure that the applicant is prepared to respond to such an emergency through coordination with relevant emergency response agencies, the Commission imposes **Special Condition 7** requiring a Fuel Dump Clean-Up Plan.

The project involves the placement of between 16 and 20 buoys offshore to outline the airshow aerobatic box used by participating pilots for flight orientation. The buoys would be 10 ft by 10 ft inflatables located approximately 3,000 ft offshore from the shoreline, anchored in approximately 40 ft deep water using Danforth anchors. An alternatives analysis presented by the applicant of different anchoring types, including helical and deadweight anchors, demonstrated that the proposed Danforth anchors are the anchor type most suitable to cost-effectively secure the buoys and prevent movement of the anchors due to wind or currents.

The applicants propose the use of lighting after dark for the proposed event to ensure that participants can safely navigate the event site during and after the airshow at the project site, which is adjacent to the ocean, paved parking lots, the Huntington Beach Pier, and hotels, restaurants, and shops in the downtown area. Coastal Act section 30240(b) requires development that is adjacent to parks and recreation areas to be sited and designed to prevent significant degradation of those areas. There are no sensitive species known to be established in the area; however, nighttime lighting and loud noises, including amplified sound, can disturb birds and other species in proximity to the project site. The event, as proposed, could impact biota on the beach that are protected by 30240(b). Further, the buoys being used to outline the airshow aerobatic box are expected to include lighting necessary to ensure safe boating navigation at

night. Without specific design plans for the buoy lighting, there exists the possibility of impacts to biological and marine species from their usage, which can be mitigated with conscious design choices. In order to ensure that the proposed activities do not significantly degrade the beach, ocean, and other recreation areas, **Special Condition 6** requires the applicant to submit a lighting plan for review and approval by the Executive Director prior to issuance of the CDP. Consistent with preliminary plans submitted by the applicant, the lighting plan shall direct all light away from the ocean, sandy beach, and from the night sky, and shall only include the lowest intensity lighting that is appropriate for event and marking buoys. **Special Condition 6** ensures that the surrounding marine environment is protected while providing public access and safety during the airshow.

By incorporating the marine resource and water quality protection measures into the proposed development, as conditioned, the project minimizes the effect of event activities on the marine environment. Therefore, the Commission finds that the proposed development, as conditioned, conforms to Sections 30230, 30231, and 30240(b) of the Coastal Act regarding the protection of marine resources and water quality.

G. California Environmental Quality Act

Section 13096 of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as modified by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act ("CEQA"). The findings above are incorporated herein by reference.

Under Section 15251(c) of Title 14 of the California Code of Regulations, the Commission's CDP regulatory process has been certified as the functional equivalent to the CEQA process. As a certified regulatory program, Section 21080.5(d)(2)(A) of CEQA still applies to the Commission's CDP regulatory process and prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect which the activity may have on the environment.

The City of Huntington Beach is the lead agency for purposes of CEQA. The City determined that the proposed development required an Environmental Impact Report (EIR). The Draft EIR for the project was released in March 2025. The Final EIR has not been published yet, but in signing Appendix B of the subject CDP application, the City determined that the project and its EIR was consistent with the CEQA requirements.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. As conditioned, there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse effect which the development may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative, has no

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remaining significant environmental effects, either individual or cumulative, and complies with the applicable requirements of the Coastal Act to conform to CEQA.

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

CDP Application 5-25-0242 and associated File Documents