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Prepared October 22, 2026 for November 4, 2026 Hearing

To: Commissioners and Interested Persons

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Subject: City of Half Moon Bay LCP Amendment Number LCP-2-HMB-26-0047-1 (Housing Changes)

SUMMARY OF STAFF RECOMMENDATION

The City of Half Moon Bay proposes to amend its certified Local Coastal Program (LCP) Implementation Plan (IP), for which the proposed changes are intended to facilitate new infill residential development on nine specific sites with an emphasis on increased density and affordable/workforce housing. The proposed amendment is also in part a result of the City's response to its 2023-2031 Housing Element and Regional Housing Needs Allocation (RHNA) assessment, under which the City is required to accommodate an additional 480 housing units citywide by 2032. The City indicates that the nine sites[1] identified could provide some 268 new housing units across all income levels.

The proposed amendment has three main parts. First, the City proposes to rezone four of the sites from R-2 (two-family residential) to R-3 (multifamily residential), and to increase the applicable maximum building heights. These proposed changes would increase the maximum allowable density for these sites from 17.42 to 29.04 dwelling units per acre (du/ac), which would increase maximum heights from 28 to 40 feet.

Second, the City proposes to establish a Workforce Housing Overlay (WHO), and to apply it to another four sites. The WHO requires that at least 20% of units be deed-restricted as affordable housing, and only allows subdivision if it is intended to provide deed-restricted school district workforce housing and/or affordable housing. The underlying zoning for the four sites is for public facilities and institutions (P-S), within which residential use is currently not allowed, but the WHO would allow residential use at a relatively high density (up to 30 du/ac for three of the sites and 45 du/ac for the fourth), where all affordable/workforce units would be subject to deed restrictions and conditions to ensure required affordability and workforce provisions.

[1] 15 parcels/APNs in total, across 9 sites.

Third, the City proposes "by-right" processing for qualifying housing projects located on the nine sites that meet specific affordability and density criteria; namely at least 20% of the units must be affordable, and density must be at least 20 du/ac. The by-right provisions would mean that these projects would not require a public hearing, would not be appealable locally,[2] and they would only be subject to the LCP's "objective standards".[3]

Overall, the proposed LCP changes seek to accommodate infill residential development within already developed areas capable of accommodating additional residential development, with an emphasis on higher density and affordable housing. The nine sites are also well inland from the shoreline and located in areas where the increased densities and heights would not lead to significant coastal resource impacts, where eight of the sites are located inland of Highway 1 and all nine sites are located more than 0.4 miles from the beach. Existing LCP coastal resource protections – which would remain unchanged with the proposed amendment – should be sufficient to address any issues that might arise if development on the nine sites is pursued.

In sum, the City's proposal will enable its coastal zone housing goals – and particularly affordable/workforce housing goals – while still protecting coastal resources, and staff recommends that the Commission approve the proposed LCP amendment as submitted. The motion to do so is found below on **page 4**.

Staff Note: LCP Amendment Action Deadline

This proposed LCP amendment was filed as complete on October 15, 2026. The proposed amendment affects the LCP's Implementation Plan only, and the 60-working-day action deadline is January 14, 2027. Thus, unless the Commission extends the action deadline (it may be extended by up to one year), the Commission has until January 14, 2027 (i.e., no later than the Commission's December 2026 meeting) to take a final action on this LCP amendment.

Therefore, if the Commission fails to take a final action in this case (e.g., if the Commission instead chooses to postpone/continue LCP amendment consideration), then staff recommends that, as part of such non-final action, the Commission extend the deadline for final Commission action on the proposed amendment by one year. To do so, staff recommends a YES vote on the motion below. Passage of the motion will result in a new deadline for final Commission action on the proposed LCP amendment. The motion passes only by an affirmative vote of a majority of the Commissioners present.

> ***Time Extension Motion:*** *I move that the Commission extend the time limit to act on City of Half Moon Bay Local Coastal Program Amendment Number LCP-2-HMB-26-0047-1 to January 14, 2028 and I recommend a yes vote.*

[2] Although local CDP decisions could be appealed to the Coastal Commission for appealable projects. At this time, it appears that two of the sites could include appealable development.

[3] However, neither the existing LCP nor the proposed amendment define "objective standards".

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1. MOTION AND RESOLUTION

Staff recommends that the Commission, after public hearing, certify the proposed LCP Implementation Plan amendment as submitted. The Commission needs to make a single motion in order to act on this recommendation, as follows.

A. Certify the IP Amendment as Submitted

Staff recommends a **NO** vote on the motion below. Failure of this motion will result in certification of the Implementation Plan amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

> ***Motion:*** *I move that the Commission reject LCP Amendment Number LCP-2-HMB-26-0047-1 as submitted by the City of Half Moon Bay, and I recommend a* ***no*** *vote.*
>
> ***Resolution to Certify:*** *The Commission hereby certifies LCP Amendment LCP-2-HMB-26-0047-1 for the City of Half Moon Bay and adopts the findings set forth below on grounds that the amended Implementation Plan conforms with the provisions of the certified City of Half Moon Bay Land Use Plan. Certification of the amendment 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 Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts on the environment that will result from certification of the Amendment.*

2. FINDINGS AND DECLARATIONS

A. Half Moon Bay Background

The City of Half Moon Bay is located about 20 miles south of San Francisco along the San Mateo County 'coastside', and the entirety of the City is located within the coastal zone. The City is bisected by Highway 1, with a traditional downtown inland of the Highway and primarily open space and relatively low intensity/density residential development on the seaward side. Since 2023, the City has added about 184 units of new housing citywide, including more than 50 affordable units and 40 ADUs. However, most of the City's housing supply is comprised of market-rate single-family dwellings.[4][5] The City also has a unique and ongoing agricultural heritage, and is home to the Half Moon Bay Pumpkin Festival, one of the oldest and largest such festivals in California, every year. In addition, the City is a popular recreational destination for visitors from all over the Bay Area, both due to its plentiful beaches, open spaces, and parks, but also due to its proximity to both the San Francisco area as well as to the Peninsula, San Mateo, the Santa Clara (or Silicon) Valley, and the East Bay via Highway 92 that enters

[4] See https://www.halfmoonbay.gov/775/Housing-Element-Update-2023-2031.

[5] As of 2020, the City's housing stock was comprised of 60.4% single-family detached homes, 11.9% single-family attached homes, 6.0% multi-family homes with 2 to 4 units, 10.4% multi-family homes with 5 or more units, and 11.3% mobile homes.

and bisects the City from the east. See **Exhibit 1** for a map showing the City's regional location and the location of the City's coastal zone.

B. LCP Background

The City's Local Coastal Program (LCP) Land Use Plan (LUP) was originally approved by the Commission in 1985, was updated again in 1993, and was then comprehensively updated in 2021. The LCP Implementation Plan (IP), and full LCP certification, occurred in 1996, and the City assumed coastal development permitting (CDP) authority at that time. The City's most recently amended its IP in 2022, and is currently in the process of comprehensively updating their IP (for which it received a $500,000 grant from the Coastal Commission in 2025). As a result, the City's LCP consists of a new and updated LUP, but the IP has not yet been updated to match. The proposed amendment is to the IP only.

C. Proposed LCP Amendment

The City proposes to amend its certified LCP to implement policies in the coastal zone intended to carry out the City's Regional Housing Needs Allocation (RHNA) goals identified in the City's 2023-2031 Housing Element, where the proposed changes are intended to facilitate new infill residential development on nine specific sites with an emphasis on increased density and affordable/workforce housing. Under its current RHNA, the City is required to accommodate an additional 480 housing units citywide by 2032, and the City indicates that the nine sites identified could provide some 268 new housing units across all income levels towards that goal.

The proposed amendment has three main parts. First, the City proposes to rezone four of the sites from R-2 (two-family residential) to R-3 (multifamily residential), and to modify height limits thereto. These proposed changes would increase the maximum allowable density for these sites from 17.42 to 29.04 dwelling units per acre (du/ac), and would increase maximum heights from 28 to 40 feet.

Second, the City proposes to establish a Workforce Housing Overlay (WHO), and to apply it to another four sites. The WHO requires that at least 20% of units be deed-restricted as affordable housing,[6] and only allows subdivision if it is intended to provide deed-restricted school district workforce housing and/or affordable housing. The underlying zoning for the four sites is public facilities and institutions (P-S), within which residential use is currently not allowed, but the WHO would allow residential use at a relatively high density (up to 30 du/ac for three of the sites and 45 du/ac for the fourth), where all affordable/workforce units would be subject to deed restrictions and conditions to ensure required affordability and workforce provisions.

Third, the City proposes "by-right" processing for qualifying housing projects located on the nine sites that meet specific affordability and density criteria; namely at least 20% of the units must be affordable, and density must be at least 20 du/ac. The by-right

[6] Where an affordable units must be "affordable to extremely low, very low, low-income, or moderate-income households".

provisions would mean that these projects would not require a public hearing,[7] would not be appealable locally,[8] and they would only be subject to the LCP's "objective standards".[9]

The nine sites, all of which could qualify for 'by right' processing, and the changes proposed, are summarized below:

Site	APNs	Acres	Existing Zoning/Max Density	Proposed Zoning/ Max Density	Existing Max Allowed Height	Proposed Max Allowed Height
940 Main Street	064-272-100	1.91	R-2/ 17.42 du/ac	R-3/ 29.04 du/ac	28	40
500 Poplar Street	064-244-040 064-244-030	0.32	R-2/ 17.42 du/ac	R-3/ 29.04 du/ac	28	40
604 Poplar Street	064-272-010 064-272-020 064-272-030	0.32	R-2/ 17.42 du/ac	R-3/ 29.04 du/ac	28	40
600 Poplar Street	064-272-170 064-272-180 064-272-190 064-272-200	0.42	R-2/ 17.42 du/ac	R-3/ 29.04 du/ac	28	40
498 Kelly Avenue	056-181-010	15.12	P-S/ Non-residential	P-S/ 30 du/ac	50	50
830 Stone Pine Road	056-590-010	6.86	P-S/ Non-residential	P-S/ 30 du/ac	50	50
101 Canada Cove Avenue	066-081-190	3.97	Mobile Home Park/ 21.78 du/ac	Mobile Home Park/ 21.78 du/ac	Unchanged	Unchanged
300 Church Street	056-150-020	2.10	P-S/ Non-residential	P-S/ 30 du/ac	50	50
0 Block Stone Pine Road	056-250-070	0.50	P-S/ Non-residential	P-S/ 30 du/ac	50	50

See **Exhibit 2** for the text of the proposed LCP amendment and see **Exhibit 3** for the map depicting the proposed zoning changes.

D. Standard of Review

The proposed amendment affects only the Implementation Plan component of the certified LCP. The standard of review for IP amendments is that they must be consistent with and adequate to carry out LCP Land Use Plan provisions.

[7] However, pursuant to the Coastal Act (14 CCR Section 13566) and the LCP (IP Section 18.20.055), a public hearing is required for any CDP application for a project that is appealable to the Coastal Commission, and it appears that two of the nine sites may result in appealable development requiring a public hearing (at 101 Canada Cove Avenue, which is seaward of the first through public road and the sea, and at 830 Stone Pine Road, which could include development within 100 feet of Pilarcitos Creek). Although the first site is clearly appealable, the second site is already developed with an existing workforce housing project located more than 100 feet from the creek, where the 100-foot creek buffer area is subject to a conservation easement, so it may be that appealability – and a public hearing – is not triggered at the second site. 101 Canada Cove Avenue is not proposed for any changes to allowable density or height. The seven other sites are not located in appealable areas.

[8] Although local CDP decisions could be appealed to the Coastal Commission for appealable projects. At this time, it appears that two of the sites could include appealable development.

[9] However, neither the existing LCP nor the proposed amendment define "objective standards".

E. Proposed LCP Amendment Consistency Determination

Applicable LUP Provisions

The LUP includes provisions designed to encourage infill development in already established neighborhoods, and housing for residents of all income levels (especially at low-income and moderate-income levels), as well as assuring adequate workforce housing, in a context-specific way that considers and protects coastal resources of significance including habitat protections and scenic and visual resources, including as follows:

> ***LUP Policy 2-4 (Sustainable Land Use Pattern):*** *Concentrate new development within the defined Urban Boundary by prioritizing development in the Town Center, allowing for infill development within established neighborhoods, and protecting the rural, open space, agricultural and habitat values of undeveloped areas.*
>
> ***LUP Policy 2-5 (Housing Element Conformance):*** *To ensure conformance with Coastal Act policies and priorities, focus the Housing Element's inventory of adequate sites within Town Center and through the Workforce Housing Overlay land use designation.*
>
> ***LUP Policy 2-70 (Workforce Housing Overlay):*** *Occupancy of the residential development established through the Workforce Housing Overlay land use designation shall be limited to the workers specified in these policies and their households, subject to a use permit, deed restriction, or other mechanism designed to ensure the housing will be affordable to the specified workforce… Establish IP standards for implementing the Workforce Housing Overlay designation, including setbacks, height limits, and other requirements as consistent for compatibility with the underlying land use designation.*
>
> ***LUP Policy 2-102 (Workforce Housing Overlay – Public Facilities and Institutions):*** *Apply the Workforce Housing Overlay to portions of lands in the Public Facilities and Institutions land use designation.*
>
> ***LUP Policy 6-49 (Riparian Corridor Buffers):*** *Buffer zones shall be required for development proposed along both sides of riparian corridors to provide habitat protection and space for meander belts and vegetation growth… For all perennial watercourses (i.e. Pilarcitos Creek…): buffer zones shall extend a minimum of 50 feet from the outer limit of the riparian vegetation or 100 feet from the top of bank, whichever is greater...*
>
> ***LUP Policy 6-41 (Wetland Buffer Zones):*** *Wetland buffer zones for proposed development shall extend a minimum of 100 feet landward from the edge of the delineated wetland. A larger buffer may be required based on site-specific evidence that a larger buffer is necessary to protect the functional capacity of the wetland ecosystem or to protect any sensitive species from the impacts of proposed development. …*

LUP Policy 9-2 (Scenic Resource Protection): *New development shall be sited and designed to protect views to and along the ocean, to minimize the alteration of natural land form, to be visually compatible with the character of its setting, and, where feasible, to restore and enhance visual quality in visually degraded areas.*

LUP Policy 9-5 (Visual Impact Evaluation): *Where any development is proposed within a scenic and visual resource area, including as designated on Figure 9-1 [page 9-18 of the LUP], a site-specific visual impact evaluation shall be required and may include visual simulations, story poles, and/or other means of visual assessment as appropriate based on the type and location of development.*

LUP Consistency Analysis

General

The Commission has, in general, found that allowing increased densities in existing developed areas able to accommodate it can be an effective tool to provide for needed housing, including affordable housing. Here, the City's proposal to identify nine sites generally located relatively inland from the coastline, generally in or near the Town Center, and in established infill areas, applies that same methodology. This conforms with LUP Policies 2-4 and 2-5 which encourage infill development within the Town Center and established neighborhoods, including through applying a Workforce Housing Overlay, where infill development opportunity sites for affordable and workforce housing are prioritized in already developed and established areas. Specifically, eight of the nine sites are concentrated either in or adjacent to the Town Center, with only the 101 Canada Cove Avenue site being located elsewhere (albeit located in the established mobile home park neighborhood at the southern end of the City, just south of the Ocean Colony neighborhood). Additionally, those eight sites are also located inland of Highway 1 and generally situated away from both prime scenic coastal views and sensitive habitat corridors.[10]

Overall, the proposed LCP changes seek to accommodate infill residential development in an already fairly developed environment able to accommodate it, with an emphasis on higher density and affordable housing. The nine sites are also well inland from the shoreline and located in areas where the increased densities and heights would not lead to significant coastal resource impacts, where eight of the sites are actually located inland of Highway 1 and more than 0.4 miles from the beach. Existing LCP coastal resource protections – which would remain unchanged with the proposed amendment – should be sufficient to address any issues that might arise if development on the nine sites is pursued.

[10] 830 Stone Pine Road is situated just inland of the Town Center area and relatively close to Pilarcitos Creek, a riparian corridor that the LCP designates as a perennial watercourse. A portion of this parcel (at 880 Stone Pine Road or the "Stone Pine Cove" development) is already developed with 46 manufactured homes for lower-income farmworker households, a manager's unit, and associated infrastructure (drives, utilities, public open space, parking areas, and landscaping). The City's approval also included a fenced conservation easement and LCP-required buffers to protect Pilarcitos Creek and its riparian habitat.

Habitat Resources

The proposed IP amendment would not enable increased development near to the ocean or the beach, nor would it enable new development in or near ESHA and other sensitive coastal resources. Out of the nine sites impacted by this amendment, only the 830 Stone Pine Road site is potentially proximal to sensitive habitat, more specifically the riparian corridor of Pilarcitos Creek. A small sliver of the parcel is within 100 feet of the riparian corridor and thus should a future project (besides what is currently developed onsite, namely the Stone Pine Cove development) be proposed, such habitat and riparian buffer protections would need to be adhered to. At the same time, it is worth noting that such a project seems unlikely given that the site has already been developed with affordable housing through a 2024 City CDP, and the area immediately surrounding Pilarcitos Creek is protected by a conservation easement.

The only other site proposed for rezoning through this action that is also located near Pilarcitos Creek is at the 300 block of Church Street, downstream from 830 Stone Pine Road. However, this parcel is more than 100 feet away from Pilarcitos Creek, so future development proposals should not implicate habitat or buffer concerns. Nonetheless, even with the by-right approval process for affordable housing projects, any proposed development for the rezoned parcels would still need to comply with the objective standards of the City's LCP, which includes clearly identified objective setback requirements from ESHA, wetlands, and other sensitive coastal resources and habitats.

By clustering new infill development and increased density in already-developed areas, and not encroaching into sensitive beaches, ocean, open space, habitat, ESHAs, or the required buffers for these coastal resources, the proposed IP amendment can be found consistent with and adequate to carry out the LUP's habitat protection policies.

Public Views and Character

LUP Policy 9-2 requires that development in the coastal zone be sited and designed to protect views to and along the ocean and be visually compatible with the general character of its setting. An important part of the City's coastal context is its visual and scenic resources, including the scenic corridors that are viewable from Highway 1, both looking west toward the ocean and east toward the Santa Cruz Mountain Range foothills. The Town Center area is part of such a scenic corridor,[11] where the most obvious outcome of the proposed IP amendment would be an increase in scale for the four sites being rezoned from R-2 to R-3 with maximum heights going from 28 to 40 feet. These sites are located just inland from Highway 1, bounded by Poplar Street to the north and Metzgar Street to the south. The City's certified LCP has designated these areas as a scenic viewing corridor, from Highway 1 looking toward the ridgeline. Accordingly, any proposed development at these sites would need to address LCP view requirements.

Similarly, the proposed rezoning at 498 Kelly Avenue would also need to address LCP view requirements, because it is also within the Highway 1 scenic corridor, and the

[11] The LCP-designates this as the Town Boulevard Scenic Corridor (which encompasses Highway 1 and Highway 92 within the City limits), and the Highway 1 Scenic Corridor (which extends 200 yards on either side of Highway 1).

portion of Kelly Avenue adjacent to the northern end of the site is identified by the LCP as a scenic coastal access route from Highway 1 out to the ocean. However, 498 Kelly Avenue is only proposed for an increased density allowance (to 30 du/ac) and a by-right approval process for qualifying affordable workforce housing projects, but not any height increases, because the underlying Public Services (P-S) designation and height limit of 50 feet would remain unchanged. Furthermore, 498 Kelly Avenue is already developed with Hatch Elementary and auxiliary structures on the property, so ocean views from the street level area are already partially occluded. The existing underlying zoning at this site allows for structures of up to four stories, or 50 feet, and will now allow for residential development only if it meets the affordability criteria and approval standards of the Workforce Housing Overlay.

While it is true that the slightly larger buildings that would be allowed pursuant to the proposed changes can impact the coastal viewshed, it is also true that such development would be inland of the prime coastal views at the immediate shoreline and would be seen against the backdrop of already-developed neighborhoods and infill areas. While many of these areas are predominantly developed with single story homes up to about 20 feet (and multi-story homes up to about 28 feet), the areas targeted for increased height allowances via the subject amendments are generally outside of the Highway 1 scenic corridor, and those that are within it are isolated to the 500-600 blocks of Poplar Street. While multi-story and denser developments in these areas might be different than the current single family residential built environment, these types of changes do not raise significant coastal resource concerns and can be found consistent with the LUP on these points. Specifically, all the sites proposed for rezoning are relatively inland, away from views to the ocean, and for those that are within the Highway 1 scenic corridor, it would appear that any visual impacts can be addressed by the LCP's view protection requirements, which are unchanged with the proposed amendment. While taller and denser development proposals may not be the norm in Half Moon Bay, this type of clustering for such development represents the types of trade-offs that coastal zone communities may need to make to provide additional housing, including lower income affordable housing. Either way, each proposal that results from these zoning changes will be individually assessed for their impacts to visual resources, and it does not appear that the changes allowed by the amended LCP would lead to the types of substantial negative impacts on public views and character that cannot be handled under the LCP.

In short, the proposed IP changes should not lead to any significant adverse public view and character issues and can be found consistent with those LUP requirements. Importantly, however, that is not the only analysis that any such future projects must face, and in fact all proposed development would require a CDP that must be found consistent with the LCP, meaning that all proposed development will itself go through an LCP analysis that is 'place-based' and context specific, where that analysis is the refined analysis that ensures that these planning level decisions are borne out, and that public views and character are protected as directed by the LCP.

For all the above reasons, the proposed IP amendment can be found consistent with and adequate to carry out the LUP with respect to public views and character.

Public Services Zoning Designation

The proposed IP amendment also aims to provide affordable workforce housing by establishing a Workforce Housing Overlay (WHO), as called for in the LUP. All four of the sites to which the WHO would be applied are developed and are currently zoned as P-S (Public Services) and would remain as such. However, while residential development is currently not allowed on these sites, the WHO would now allow such development for these sites. The 300 Block on Church Street would have an allowable density of 45 du/ac for WHO projects, while the other three sites[12] would have an allowable density of 30 du/ac for WHO projects.

LUP Policy 2-102 specifically calls for the application of the WHO for portions of lands in the Public Facilities and Institutions (P-S) land use designation. As such, the City has proposed applying the WHO to opportunity sites identified as part of the Housing Element process and for its RHNA requirements. The four P-S sites are located on already-developed sites in already-developed neighborhoods, as is encouraged by LUP Policy 2-4. Furthermore, the sites are generally located away from sensitive coastal resources, with the exception of 830 Stone Pine Road, as previously discussed. The existing height limit for P-S zoning would remain unchanged, at a maximum of four stories or 50 feet.

Thus, the allowance of a Workforce Housing Overlay on these four sites designated P-S (Public Services) does not raise any significant coastal resource concerns and may provide valuable opportunities for affordable/workforce housing in an already established infill development setting in a way that is consistent with and adequate to carry out the LUP.

Permitting Procedures and Hearings

All nine sites are proposed for "by-right" or ministerial review only through the proposed IP amendments, which means in theory that the City could approve a CDP for development on these sites with no public hearing. However, the LCP is clear that consistent with the Coastal Act and regulations,[13] "a public hearing is required on most discretionary action and on all actions appealable to the Coastal Commission."[14,15] One of the subject parcels (101 Canada Cove Avenue) is fully within the appeals jurisdiction of the Coastal Commission and a portion of a second subject parcel (830 Stone Pine Road) is partially within the appeals jurisdiction. Therefore, any proposals on these sites that implicate appealable areas would still require a public hearing.

In approving a by-right application, the City may impose conditions of approval to ensure that the development complies with the objective standards of the LCP. Regarding public noticing, the City indicates that it intends to continue its standard

[12] 830 Stone Pine Road (APN 056-590-010), 498 Kelly Avenue (APN 056-181-010), and the 0 Block Stone Pine Road (APN 056-250-070)

[13] Coastal Act Sections 30333 and 30620 (via 14 CCR Section 13566).

[14] See Page A-2 of the City's certified LCP Land Use Plan.

[15] Section 18.20.055 of the City's IP states that a public hearing shall be required on all appealable development, as is required by the City's LUP (the standard of review).

noticing procedures (for property owners, residents and neighbors within 300 feet) and requiring a physical posting-on-site upon receipt of an application to the City's planning department.

The proposed changes to local hearings would only affect the nine sites proposed for by-right approval processes in order to facilitate increased density and affordable housing, and only if the affordability criteria and approval requirements of IP Chapter 18.44 (By-Right Affordable Housing Development) are met, including compliance with the objective standards of the LCP, discussed in further detail below. Therefore, the proposed IP procedural changes for by-right affordable housing development do not raise any significant procedural consistency issues and are adequate to carry out the LUP requirements on this point.

Objective Standards

The proposed LCP amendment refers to "objective standards" of the LCP needing to be met in order for the by-right approval process and local streamlining efforts to be possible. More specifically, on pages 9-10 of Exhibit 2, for "by-right" or ministerial approval by the City's planning department, it states that the City's Planning Director may approve a project that meets such requirements only after making a finding that "the proposed development is consistent with the objective standards of the: General Plan, this Development Code, the City's Local Coastal Program & Land Use Plan and other City goals, policies, and standards, as applicable."

However, the City's LCP (which includes both the LUP and IP components) does not define "objective standards". It is important to note that there are numerous LCP provisions that the Commission understands as objective and would apply in all situations, including, but not limited to, height limits, lot coverage requirements, and required setbacks for wetlands, riparian corridors, ESHAs, and geologic hazards. Additionally, the City indicates that LCP objective standards include: maximum and minimum allowed density, minimum site area per unit, minimum site width, minimum mean site area, minimum setbacks (front, side, rear, street side), combined setback percentage, maximum height, maximum lot coverage, usable open space, maximum building envelope, vehicle parking, in addition to the numerous LCP provisions that the Commission understands as objective.

Therefore, with this understanding established regarding the applicability of the LCP's objective standards as part of the standard of review for the proposed by-right affordable housing approval process, the proposed IP amendment can be found LUP consistent on these points.

Conclusion

In sum, the City's proposal will facilitate achievement of its coastal zone housing goals – and particularly affordable/workforce housing goals – while still protecting coastal resources. Thus, the Commission concludes that the proposed IP amendment can be found to conform with and be adequate to carry out the provisions of the LUP, and the Commission approves the proposed LCP amendment as submitted.

F. California Environmental Quality Act (CEQA)

CEQA Section 21080.5(d)(2)(A) prohibits a proposed LCP or LCP amendment from being approved if there are feasible alternatives and/or feasible mitigation measures available that would substantially lessen any significant adverse effect that the LCP or LCP amendment may have on the environment. Although local governments are not required to satisfy CEQA in terms of local preparation and adoption of LCPs and LCP amendments, many local governments use the CEQA process to develop information about proposed LCPs and LCP amendments, including to help facilitate Coastal Act review. In this case, in November 2025 the City adopted a Mitigated Negative Declaration for the proposed 2023-2031 (6th Cycle) Housing Element Environmental Impact Report which assessed the subject IP amendments.

The Coastal Commission is not exempt from satisfying CEQA requirements with respect to LCPs and LCP amendments, but the Commission's LCP amendment review, approval, and certification process has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA (CCR Section 15251(f)). Accordingly, in fulfilling that review, this report has discussed the relevant coastal resource issues with the proposal, has addressed all significant comments received, and has concluded that approval of the proposed LCP amendment is not expected to result in significant environmental effects, including as those terms are understood in CEQA.

Accordingly, it is unnecessary for the Commission to suggest modifications (including through alternatives and/or mitigation measures) as there are no significant adverse environmental effects that approval of the proposed amendment would necessitate. Thus, the proposed amendment will not result in any significant adverse environmental effects for which feasible mitigation measures have not been employed, consistent with CEQA Section 21080.5(d)(2)(A).

3. APPENDICES

A. Substantive File Documents

- LCP Amendment File for LCP-2-HMB-26-0047-1
- City of Half Moon Bay Housing Element Environmental Impact Report

B. Staff Contact with Agencies and Groups

- City of Half Moon Bay Planning Department
- California Department of Housing and Community Development