**COMPARISON OF COASTAL ACT POLICY CONSISTENCY:**

 **LAND USE FOR PEDRO POINT FIELD**

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| **Coastal Act Policy**  | **Commercial – Recreation** [**C-R]** (current) or **Low-Intensity Visitor-serving Commercial (LIVC)**; PPCA alternative)  | **Coastal Residential Mixed Use** [**CRMU**] proposed LU Update  |
| **Section 30212 New development projects –** (a) ***Public access from the nearest public roadway to the shoreline*** and along the coast *shall* be provided in *new development projects* except where: (1) [conflict] public safety, military security..protection of fragile coastal resources,(2) [redundant shore access] (3) [conflict] agriculture | **Fully consistent**; Recreational land use: physically compatible with public access from public road to shore.  | **CONSTRAINT OR CONFLICT**: Mixed residential land use at 10-15 units/acre: constraint on access from public road to shore |
| **Section 30221 Oceanfront land; protection for recreational use and Development*****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. | **Fully consistent**; directly furthers purpose of section 30221.Pedro Point Field is adjacent to Pacific Ocean, separated by historic railroad berm segment; thus “oceanfront”; fully suitable for recreational use (Outdoor beer garden or socially-distant eating opportunities, food trucks, mini-golf, Easter egg hunts, Firehouse children’s park spillover, dog walking; ball games) | **CONFLICT:** Residential development precludes recreational use and development.Recreational opportunities in the neighborhood on alternate sites are precluded: steep hillslopes, saturated residential development.  |
| **Section 30222 Private lands; priority of development purposes****The use of private lands suitable for *visitor-serving commercial recreational facilities* designed to enhance public opportunities for coastal recreation *shall have priority* over *private residential*, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.** | **Fully consistent**: *visitor-serving commercial recreational facilities* designed to enhance public opportunities for coastal recreation | **CONFLICT**: Private residential development and general commercial development allowed to have priority over and exclude visitor-serving commercial recreational development. |
| **Section 30240 Environmentally sensitive habitat areas (ESHA); adjacent developments**(a) Environmentally sensitive habitat areas sh*all 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*. | **Compatible**: Low-intensity recreational uses may be compatible with seasonal wetlands (no fill or drainage required for dry season use) and adjacent perennial wetland swale tributary to San Pedro Creek (documented California red-legged frog habitat) | **CONFLICT**: Residential development at proposed density range would require fill and drainage of seasonal wetlands and degrade ESHA wetlands.  |
| **Section 30242. Lands suitable for agricultural use; conversion**All other ***lands suitable for agricultural use*** shall not be converted to nonagricultural uses | **Compatible**: historical artichoke field soils may be kept intact or converted back to coastal agriculture (U-pick berry farm model) | **CONFLICT**: Residential development would require placement of pad fill (flood protection; 100 yr floodplain) and drainage) precluding agriculture physically and by land use conflict |
| **Section 30251 Scenic and visual qualities****The *scenic and visual qualities of coastal areas shall be considered and protected* as a resource of public importance.** Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to *minimize the alteration of natural land forms*, to be *visually compatible with the character of surrounding areas*… | **Compatible**. Low-intensity or open space recreational development protects scenic ocean views.  | **CONFLICT**: Residential development would infill the last open space in coastal lowlands from Linda Mar to Pedro Point.  |
| **Section 30253 Minimization of adverse impacts**New development shall do all of the following:(a) **Minimize risks to life and property in areas of high geologic, flood, and fire hazard**.(b) Assure stability and structural integrity, and **neither create nor contribute significantly to erosion, geologic instability,** or destruction of the site or surrounding area or in any way **require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs**. […] | **Compatible**.  | **CONFLICT**. Most of field lies approximately 15-17 feet in elevation above Mean Sea Level (MSL), only about 3-5 feet above the marsh and high tide beach at the mouth of San Pedro Creek. Residential development requires flood protection and drainage. Wave runup to the field depends on the non-engineered privately owned berm which is not maintained by Pacifica. Residential development would require armored flood protection structures as sea level rises. Alluvial soils (historical wetland) of the field have the same relative liquefaction (earthquake shaking) potential as diked bay muds and marshes in San Francisco Bay |
| **Section 30255 Priority of coastal-dependent developments*****Coastal-dependent developments shall have priority over other developments*** *on or near the shoreline*. Except as provided elsewhere in this division, ***coastal-dependent developments shall not be sited in a wetland****.* When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support. | **Fully consistent**. Coastal visitor-serving recreational uses do not require fill or drainage of wetlands in field directly landward of the ocean shoreline.  | **FULL CONFLICT**. Residential development is not coastal-dependent, and would infill the seasonal wetlands in the lowland floodplain of the field.  |