

COASTAL CONSERVANCY

Staff Recommendation

June 18, 2026

**PEDRO POINT HEADLANDS RULEMAKING ACTION**

Project Manager: Erin Gravley

**RECOMMENDED ACTION:** Authorization to adopt regulations governing use of State-owned land at the Pedro Point Headlands San Mateo County.

**LOCATION:** Pedro Point Headlands, San Mateo County

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EXHIBITS

Exhibit 1: [Project Location](#)

Exhibit 2: [Proposed Regulations](#)

Exhibit 3: [Final Statement of Reasons](#)

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**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes adoption of regulations governing use of land owned by the State on behalf of the Conservancy at Pedro Point Headlands in San Mateo County, as set forth in Exhibit 2. The Executive Director is authorized to transmit the proposed regulations to the Office of Administrative Law for filing with the Secretary of State, and, if during its approval process the Office of Administrative Law determines that minor, non-substantive corrections to the language of the proposed regulations are needed for clarity or consistency, the Executive Director may make such changes.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 3 of Division 21 of the Public Resources Code, regarding establishment and functions of the Conservancy.
2. The proposed regulatory action, while not a project, is consistent with the current Conservancy Project Selection Criteria.

## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY**

Staff recommends the Conservancy authorize adoption of regulations governing use of State-owned land at Pedro Point Headlands in San Mateo County (Exhibit 1), as set forth in Exhibit 2 and with authority for the Executive Officer to make minor, non-substantive corrections to the language of the proposed regulations as needed for clarity or consistency under the Administrative Procedures Act.

In 1995, the Conservancy acquired 94 acres of undeveloped property with stunning coastal views, diverse habitats, and public trails at Pedro Point Headlands (Pedro Point Headlands) to protect the land from development and conserve the property for the purposes of natural resource conservation, habitat restoration, and public access. Historically, Pedro Point Headlands was used by a motorcycle club, causing erosion and gulying to the land. As part of the acquisition, the Conservancy entered into a management agreement with the Pacifica Land Trust (PLT), which included restoring Pedro Point Headlands and facilitating public access. Over the past 20 years, the Conservancy awarded other grants to PLT for community-based restoration and trail enhancements at Pedro Point Headlands, and PLT has made significant progress in restoring the natural habitats, such as coastal scrub, and improving the public trail system.

Unfortunately, improper use of Pedro Point Headlands has resulted in habitat degradation, damage to property, and unsafe conditions, creating a need to adopt regulations. For example, signage was removed, water tanks were graffitied, a storage unit was vandalized, and maintenance equipment was stolen. In addition, Pedro Point Headlands has multi-use trails, some of which are near the bluff's edge, many of which are steep with limited visibility. One trail is too narrow for pedestrian users to pass cyclists, equestrians, and other non-pedestrian users safely. In addition to steep and narrow terrain, there has been unauthorized off-trail use, resulting in damage to previously restored habitat areas, non-authorized use of chainsaws to clear vegetation, installation of a slackline high above a ravine, and unauthorized construction of a structure near the bluff's edge. After sunset, there is minimal to no lighting, causing safety concerns considering the nature of the topography with steep bluffs, a narrow trail, and trails with limited visibility. Finally, there are planning efforts underway for a priority segment of the California Coastal Trail over Pedro Point Headlands; if implemented, Pedro Point Headlands might experience an increase in visitation and user groups, requiring additional balancing of safety, natural resource protection, wildfire prevention, and recreational uses.

To allow for more effective management of Pedro Point Headlands, the Conservancy seeks to adopt regulations governing use of Pedro Point Headlands, including rules that protect PLT's habitat restoration and public access improvements to the land, and enhance the Conservancy's ability to provide safe public access while protecting the natural resources at Pedro Point Headlands. Although the Conservancy may rely on existing state statutes and local ordinances to address some management issues, those laws are not always sufficient.

On April 3, 2026, the Conservancy published a Notice of Proposed Rulemaking Action in the California Regulatory Notice Register (notice register 2026, number 14-Z) and, on or before

April 3, 2026, the Conservancy publicly circulated the proposed regulations, welcoming written public comments relevant to the proposed regulatory action from April 3, 2026 to May 19, 2026. The public comment period closed May 19, 2026, at 11:59 p.m. The Conservancy received 11 written comment letters on the proposed regulations and no requests for a public hearing at least 15 days before the close of the written public comment period. The Conservancy has responded to all comments in the Final Statement of Reasons (Exhibit 3) and, after weighing the priorities of multiple user groups, has determined that no changes to the proposed regulations are warranted. This Staff Recommendation was posted online on June 9, 2026. As of June 8, 2026, the Conservancy had not received additional written public comments relevant to the proposed regulations or a request for a public hearing. Conservancy staff is now recommending adoption of the regulations, as set forth in Exhibit 2.

**Site Description:** Pedro Point Headlands is a large promontory located at the southern edge of the City of Pacifica, approximately 15 miles south of San Francisco. Pedro Point Headlands rises almost vertically from the ocean to a height of approximately 625 feet, where the bluff-tops provide a spectacular view of the coastline north to Point Reyes, south to Devil’s Slide, and east to Montara Mountain and the Santa Cruz Mountains. While a small portion of the Pedro Point Headlands is privately owned and developed with houses, the remainder is publicly-owned open space. The Conservancy owns approximately 94 acres, and the City owns approximately 162 adjacent acres at Pedro Point Headlands.

The only level areas at Pedro Point Headlands lie along the bluff-tops and in the main valley. Scenic trails link these level areas and connect to a six-foot-wide trail running parallel to Highway 1. To the south, protected public land extends to Devil’s Slide County Park, while nearby Pacifica State Beach, an approximately 0.75-mile crescent shaped beach, is popular regionally for families and surfers. A planned California Coastal Trail alignment for the Pedro Point Headlands is anticipated to connect approximately 7 miles of existing Coastal Trail segments in the City of Pacifica to the Coastal Trail at Devil’s Slide.

## **CONSISTENCY WITH CONSERVANCY’S PROJECT SELECTION CRITERIA**

While the regulatory action is not a project, this section considers how the project selection criteria apply to this proposed Conservancy action. The proposed regulatory action is consistent with the Conservancy’s Project Selection Criteria, last updated on September 23, 2021, in the following respects:

### **Selection Criteria**

#### **1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the “Consistency with Conservancy’s Strategic Plan” section below.

**2. Project is a good investment of state resources.**

The proposed regulations will enable the Conservancy to deliver clear guidance to the public on how to safely recreate at Pedro Point Headlands and improve the Conservancy's ability to protect the environment.

**3. Project benefits will be sustainable or resilient over the project lifespan.**

The proposed regulations were drafted to complement regulations governing nearby land and to facilitate conservation of natural resources, protection of wildlife habitats, responses in emergency circumstances, and the public's safe access to the property, leading to sustainable and resilient benefits for the land and public.

**4. Project delivers multiple benefits and significant positive impact.**

The proposed regulations will deliver multiple benefits, including increasing public safety, reducing conflicts between different user groups, and protecting wildlife and the natural environment.

**5. Project planned with meaningful community engagement and broad community support.**

The proposed regulations were drafted with input from land management agencies, such as the City of Pacifica and the United States National Park Service, and the Conservancy notified the public of the proposed regulations. The Conservancy published the Notice of Proposed Rulemaking; notified individuals and groups it believed would be interested in the proposed regulations, including neighbors and those on a Pedro Point Coastal Trail Planning project listserv; posted the notice, proposed regulations, and initial statement of reasons to its website; and has offered to make the entire rulemaking file available for inspection and copying at its office. The Conservancy welcomed written public comments relevant to the proposed regulatory action for 45-days and considered all input received.

**FINANCING**

No funds are recommended for the proposed regulatory action.

**CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION**

The proposed regulatory action will be undertaken pursuant to Chapter 3 of Division 21 of the Public Resources Code, Sections 31100 to 31123, regarding establishment and functions of the Conservancy. Pursuant to Section 31105, the Conservancy is authorized to acquire real property or interests for purposes specified in Division 21; and, pursuant to Section 31102, the Conservancy shall adopt its own regulations. Consistent with these sections, the Conservancy acquired a portion of the Pedro Point Headlands for coastal restoration and public access, aligned with Division 21, and is now proposing adoption of regulations to more effectively manage the property.

**CONSISTENCY WITH CONSERVANCY'S [2023-2027 STRATEGIC PLAN](#)**

Consistent with **Goal 2 Enjoy the Coast** and **Goal 3 Protect and Restore the Coast**, adoption of regulations for State-owned property at Pedro Point Headlands will allow the public to continue to access and enjoy Pedro Point Headlands, while also protecting the property's scenic and natural resources.

**CEQA COMPLIANCE:**

Under the California Environmental Quality Act (CEQA), a "project" consists of an activity that may cause either a direct physical change in the environment, or a reasonably foreseeable indirect change in the environment; and is an activity directly undertaken by any public agency, an activity undertaken by a person who is supported through a form of assistance from one or more public agencies, or an activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (Public Resources Code Section 21065.) The CEQA Guidelines further define the term "project" and confirm that it does not include continuing administrative activities or organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment. (Cal. Code Regs. tit. 14, Section 15378(b)(2), (5).) Adoption of the proposed regulations is an administrative activity that does not have the potential to cause a physical change to the environment. Accordingly, adoption of the proposed regulations governing use of land within the Pedro Point Headlands under the Conservancy's ownership or control does not constitute a "project" for purposes of CEQA.