

## STATE COASTAL CONSERVANCY FINAL STATEMENT OF REASONS

California Code of Regulations  
Title 14. Natural Resources  
Division 5.6. State Coastal Conservancy  
Chapter 5: Use of Pedro Point Headlands in San Mateo County  
(Section 13770 to Section 13796)

### UPDATE TO THE INITIAL STATEMENT OF REASONS

The information contained herein is updated as follows:

The Notice of Proposed Rulemaking (Notice) for these regulations was published in the California Regulatory Notice Register on April 3, 2026. The Notice invited written public comment relevant to the proposed regulatory action for a 45-day period between April 3, 2026 and May 19, 2026, and notified the public that any interested person could submit a written request for a public hearing at least 15 days prior to the close of the written public comment period; at a requested public hearing, the public can provide written and oral public comments.

The State Coastal Conservancy (Conservancy) received 11 written comments, summarized and discussed below, between April 3, 2026 and May 19, 2026. The Conservancy received no requests for a public hearing at least 15 days prior to the close of the written public comment period. After reviewing the 11 written comments and weighing the priorities of multiple user groups, the Conservancy made no changes to the proposed regulations and, therefore, did not alter the regulatory effect of the proposed provisions. Thus, no further notice is required. The entire rulemaking file, including the full text of the regulation as originally proposed, has been available to the public since April 3, 2026.

The Conservancy did not add and rely on a technical, theoretical, or empirical study, report, or similar document after publication of the notice of proposed action; thus, there were no documents of this nature to mail in accordance with Section 11347.1 of the Government Code.

### SUMMARY AND RESPONSE TO WRITTEN COMMENTS RECEIVED DURING 45-DAY COMMENT PERIOD:

The Conservancy received and reviewed the following 11 written comments during 45-day comment period:

#### **Comment 1 – A.L.**

**Comment 1.1:** Commenter notes that the mountain biking loop through the Pedro Point Headlands is a valued community resource. He acknowledges that some trails on the property may not be suitable for mountain bike use, such as the South Ridge and Arroyo Trails, but advocates for mountain biking use on the future Coastal Trail segment.

Response: The Conservancy is striving for balanced use of the trails and is weighing the priorities of multiple user groups, including safety concerns. As the commenter noted, not all trails are suitable for bicycle use. The proposed regulations authorize the Conservancy Executive Officer to determine appropriate locations for conventional bicycles and/or e-bikes based on specific factors, including public safety, protection of natural resources, and infrastructure and improvements to support the activity. The proposed regulations authorize use of conventional bicycles and/or electric bicycles where Conservancy signs expressly authorize conventional bicycles or a specific e-bike classification for a designated trail. In addition, the Conservancy is considering developing an improvement to the Pedro Point Headlands, a California Coastal Trail segment, which would be a multi-modal trail that could better support multiple user groups and provide cyclists with a safer alternative to traveling on Highway 1, south to Devil's Slide County Park and beyond. Thus, no change was made in response to this comment.

Comment 1.2: Commenter is concerned that a 5 mile-per-hour speed limit is unrealistic and inconsistent with current use and requests an alternate approach.

Response: The Conservancy has determined that no change to the default trail speed limit is necessary. The Conservancy is striving for balanced use of the trails and is weighing the priorities of multiple user groups, including safety concerns. The proposed regulation authorizes the Conservancy Executive Officer to designate trail speed limits on specific trails to protect the public, environment, and wildlife; and limits trail speed to 5-miles-per-hour, unless a sign or notice indicates a different speed. The Conservancy considered a higher default speed limit but determined that 5 miles-per-hour was necessary because there are areas with limited visibility and other commentors' experiences and concerns with cyclists traveling at high speeds and/or without regard for the public's safety. In addition, the Conservancy is considering developing an improvement to the Pedro Point Headlands, a California Coastal Trail segment, which would be a multi-modal trail that could better support multiple user groups and provide cyclists with a safer alternative to traveling on Highway 1, south to Devil's Slide County Park and beyond. Thus, no change was made in response to this comment.

## **Comment 2 – B.M.**

Comment 2.1: The commenter strongly objects to the presence of conventional bicycles or e-bikes on hiking trails at Pedro Point Headlands due to the risk of injury to hikers, especially senior citizens. The commenter no longer walks on hiking trails because the commenter has almost been hit by cyclists and/or e-bikers and is concerned that an injury could permanently compromise the quality of the commenter's life or result in their death. The commenter requests that bicycles and e-bikes have designated trails separate from pedestrian use.

Response: The Conservancy appreciates the commenter's safety concerns and consideration for senior trail users. The Conservancy wishes to provide coastal access for as many Californians as possible and is striving for safe and a balanced of the limited trails at Pedro Point Headlands. The proposed regulations authorize the Conservancy Executive Officer to determine appropriate locations for conventional bicycles and/or e-bikes use based on specific factors, including public safety, and to designate trail speed limits on specific trails to protect the public, environment, and wildlife; the proposes regulations also limits trail speed to 5-miles-per-hour, unless a sign or notice

indicates a different speed. In addition, the Conservancy is considering expansion of the California Coastal Trail, a multi-modal trail that could provide cyclists with a safer alternative to traveling on Highway 1 south to Devil's Slide County Park and beyond. Thus, the proposed regulations address this safety concern.

Comment 2.2: The commenter requests that if a ban on bicycles and e-bikes is not feasible, then there should be a requirement that conventional bicycles and e-bikes have bells on them to alert hikers but also notes that this would create noise pollution into an otherwise pristine environment where one can hear birds, nature, and insects.

Response: The Conservancy must balance public access, natural resource conservation, and comments from other members of the public. The Conservancy did not add a regulation requiring all cyclists to obtain and use bells because of the environmental reasons stated by this commenter and comments from cyclists that the regulations are too restrictive. The regulations, however, do not prevent cyclists from using bells or other methods to notify other trail users of their presence. Thus, no change was made in response to this comment.

### **Comment 3 – J.S.**

Comment 3.1: The commenter states that some of the proposed regulations, such as prohibiting Class 3 e-bikes, fires, cutting down trees, and harming wildlife, are reasonable but finds many regulations too restrictive. The commenter is concerned with the proposed regulation prohibiting bicycles on certain trails and the 5-miles-per-hour speed limit and suggests, at minimum, 15-miles-per-hour speed limit.

Response: See the Conservancy's response to comments 1.1 and 1.2, above.

Comment 3.2: The commenter finds a dog leash requirement too restrictive.

Response: The Conservancy is striving for balanced use of the trails and is weighing the priorities of multiple user groups, including cyclists, equestrians, and hikers. Other commentors have expressed concern about off-leash dogs. The Conservancy also has an obligation to balance public access with natural resource conservation. Requiring dogs to be on leash allows visitors to walk their dogs while minimizing visitor conflicts and disturbance to the property's natural resources. Thus, no change was made in response to this comment.

Comment 3.3: The commenter, while not a drone owner, objects to the prohibition on drones because it restricts people's hobbies and prevents obtaining coastline footage.

Response: The Conservancy is striving for balanced use of the trails and is weighing the priorities of multiple user groups. The Conservancy also has an obligation to balance public access with natural resource conservation. Drones create noise pollution, which can disturb visitors and stress wildlife, such as nesting birds. In addition, much of the terrain is steep and/or heavily wooded; a fallen drone likely could not be safely retrieved, possibly causing unsafe conditions for members of the public attempting to retrieve a drone, persons entering areas closed to the public, or negative impacts to natural resources if not retrieved. Thus, no change was made in response to this

comment.

**Comment 4 – J.S.2**

Comment 4.1: The commenter stated that the 5-mile-per-hour speed limit won't be followed by a great number of bicyclists.

Response: See the Conservancy's response to comment 1.2, above.

**Comment 5 – B.H.**

Comment 5.1: Commenter supports allowing Class 1 e-bikes only and inquired about enforcement mechanisms.

Response: The regulations prohibit use of conventional bicycles or electric bicycles, except where Conservancy signs expressly authorize conventional bicycles or a specific e-bike classification for a designated trail. The proposed regulations authorize the Conservancy Executive Officer to determine appropriate locations for e-bikes and designate e-bike classifications for a designated trail based on specific factors, including public safety. If an e-bike classification is authorized on a trail, the proposed regulations require that a sign at or near the trail, designating permissible e-bike classifications, be installed to notify the public. The regulations seek to provide clarity to the public and prevent conflicts between visitors. The Conservancy does not employ enforcement staff, such as rangers, but partners with other agencies and organizations to protect and restore coastal resources, to help people get to and enjoy the coast, and to enhance climate resilience. As needed, the Conservancy will coordinate with partners for enforcement.

**Comment 6 – S.C.**

Comment 6.1: The commenter values the ability to exit off Highway 1 and enter the Pedro Point Headlands to cycle from Pacifica to Devil's Slide County Park. The commenter advocates for continued bicycle use on the trails while acknowledging the necessity of protecting hikers and the landscape.

Response: See the Conservancy's response to comment 1.1, above.

**Comment 7 – C.Q.**

Comment 7.1: The commenter generally agrees with the proposed regulations but would like the regulations to specify enforcement actions for violations of e-bike regulations, such as confiscation or disablement of a wheel or key, to limit e-bikes to pedal-assist bikes with strict speed limits, and to provide for enforcement staff.

Response: The Conservancy does not employ enforcement staff, such as rangers, but partners with other agencies and organizations to protect and restore coastal resources, to help people get to and enjoy the coast, and to enhance climate resilience. As needed, the Conservancy will coordinate with partners for enforcement.

### **Comment 8 – J.E.**

Comment 8.1: The commenter acknowledges that the proposed regulations must balance public access with natural resource conservation. The commenter notes that the use of Unmanned Aerial Vehicles (drones) for hobbyists is prohibited and requests that the proposed regulation be reconsidered for FAA Trust Certificate holders in a well-defined, designated area that is compatible with other recreation activities. The commenter provides example in the region where drone flying is permitted in specific areas with rules and regulations, notes that to the commenter’s knowledge, this has not led to negative outcomes, and requests that the regulations direct park users to where drones would be allowed with minor impacts to nature.

Response: See the Conservancy’s response to comment 3.3, above.

### **Comment 9 – A.Z.**

Comment 9.1: Commenter supports the regulation requiring dogs on leash and suggests adding a means of enforcement or signage.

Response: The proposed regulations require dogs, except for service animals, to be on a leash that does not exceed six feet in length and authorize the Conservancy Executive Director to erect or post signs notifying the public of rules. Thus, the proposed regulations address this concern.

### **Comment 10 – Y.T.**

Comment 10.1: The commenter states that the proposed regulations make sense and suggests that a trash can with dog waste bags be added to the Pedro Point Headlands to keep the area clean.

Response: The Conservancy appreciates the suggestion and will take it into consideration (for management purposes) outside of the rulemaking process.

### **Comment 11 – T.S.**

Comment 11.1: The commenter, commenting both as a field biologist and recreational hiker, advises a maximum six-foot leash for leashed dogs to protect other human users and wildlife, including ground-nesting birds.

Response: See the Conservancy’s response to comment 8.1, above.

Comment 11.2: The commenter noted that a major concern at Pedro Point Headlands is the disregard for hikers’ safety by enough bicyclists to cause some hikers to abandon the park entirely.

Response: See the Conservancy’s response to comments 2.1, above.

Comment 11.3: The commenter notes that regulations limiting e-bike use to Class 1 are generally disregarded in other areas but that the proposed regulations are a step in the right direction of

park safety and environmental preservation for Pedro Point Headlands.

Response: The Conservancy appreciates this feedback. No change has been made in response to this comment.

**SUMMARY AND RESPONSE TO ORAL COMMENTS RECEIVED AT THE PUBLIC HEARING:**

The Conservancy received no requests for a public hearing (to provide written and oral public comments) at least 15 days prior to the close of the written public comment period.

**SUMMARY AND RESPONSE TO WRITTEN COMMENTS RECEIVED DURING THE 15-DAY COMMENT PERIOD:**

As discussed above, no further notice was required; thus, there was no subsequent written comment period.

**SUMMARY AND RESPONSE TO WRITTEN COMMENTS RECEIVED AFTER THE COMMENT PERIOD:**

The Final Statement of Reasons 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.

**LOCAL MANDATE DETERMINATION:**

In accordance with Section 11346.9(a)(2) of the Government Code, the Conservancy has determined that the regulations do not impose a mandate on local agencies or school districts.

**ALTERNATIVES DETERMINATION:**

In accordance with Section 11346.9(a)(4) of the Government Code , the Conservancy determined that no alternative it considered or that was otherwise identified and brought to its attention would be more effective in carrying out the purpose for which the regulation is proposed, would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. The only alternatives that were brought to our attention during this rulemaking process are discussed above in the summary and response to comments, and the Conservancy has not identified any others.