

**Date** : November 1, 2024

**To** : Scott Phillips, City of Half Moon Bay

Linda Hitchcock, California State Parks

**Subject:** Pullman Ditch Culvert Replacement Project Biological Report

It has come to my attention that the use of the term “bluff” in the Project and Property Description introductory section of the biological report for the Pullman Ditch Culvert Replacement project (dated June 20, 2022) has been interpreted as to suggest that the project is on or adjacent to a sea cliff or bluff that would invoke a setback requirement.

This interpretation is not correct and is not consistent with other language in that same paragraph as well as in the rest of the document, including maps and figures. To avoid confusion, I have suggested removing the word “bluff” and retaining the reference to “coastal terrace” in the following sentence.

The edited paragraph should read (emphasis added):

**The proposed project is within a coastal area impacted by previous road construction, agriculture, and other activities. The area is a low marine terrace, with soil composed of alluvial deposits from sedimentary rocks and other sources. The topography is fairly flat, sloping gently toward the ocean.**

### **Background**

The word “bluff” and the term “bluff area” may be commonly used as a description of habitat, rather than a specific landform. In Half Moon Bay State Beach, we use the term to differentiate the habitat found on dunes and sandy areas typically closer to the ocean from that found on the upland marine terraces that comprise the majority of the State Park land.

The Half Moon Bay Local Coastal Land Use Plan (page 6-32) uses the term “blufftop terraces” to describe the area inland from the sea cliff in the definition of sea cliffs as a Terrestrial ESHA (emphasis added):

**Sea Cliffs. Sea cliffs are areas of steep slopes at the interface between the marine environment and land-based habitats including blufftop terraces. Sea cliffs are generally present along bluff/marine environment interface in areas where dune habitat is lacking, primarily south of Half Moon Bay State Beach. All areas that meet this definition of Sea Cliffs are considered ESHA.**

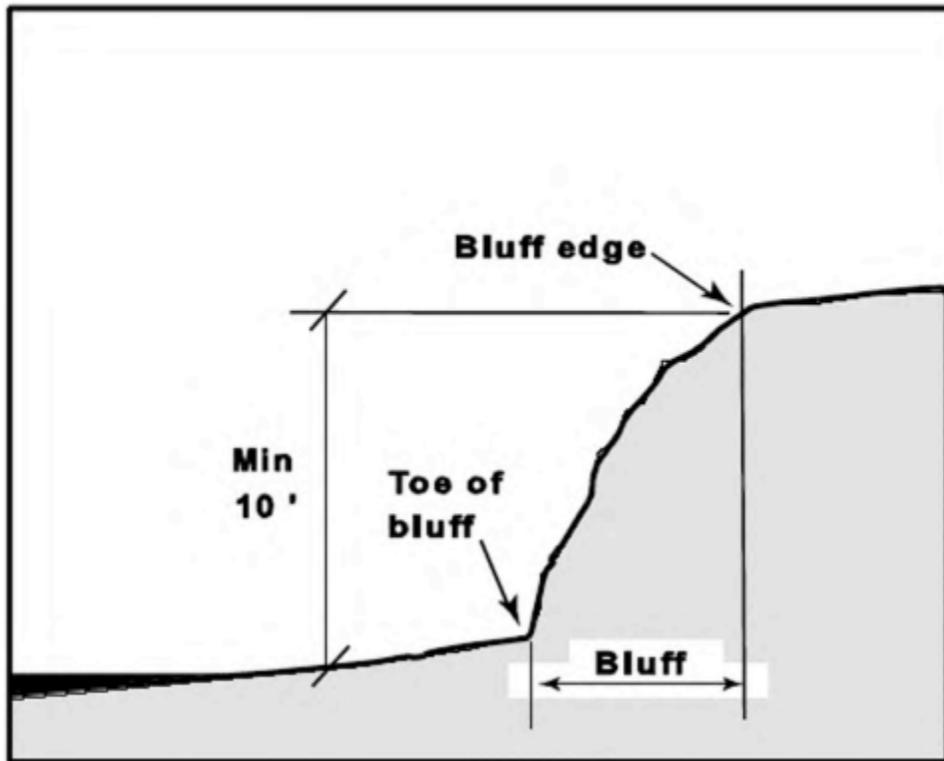
From this definition, the area included in the Terrestrial ESHA and thus requiring a setback is the area of the bluff/marine interface, or the bluff edge. The blufftop terraces are outside of this definition.

### **Recommendation**

To reduce confusion over the term “bluff” or “blufftop” as it applies to the setback requirements, it may be valuable to use more accurate definitions with illustrations. As an example, the City of San Diego Coastal Bluffs and Beaches Guidelines include the figure below to clearly define the

meaning of “bluff” for the purpose of the regulations.

### DIAGRAM I-1: COASTAL BLUFF



From Coastal Bluffs and Beaches Guidelines (amended 2020)  
San Diego Municipal Code; Land Development Code

#### Conclusion

The biological report for the Pullman Ditch Culvert Replacement project (dated June 20, 2022) correctly describes the project location as being on a low coastal terrace over 300 feet inland from the marine interface.

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