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CRAC-26-01

January 22, 2026

MEMORANDUM

TO: Coastal Resources Advisory Council (CRAC)
FROM: Ken Richardson, *Shoreline Management Specialist*
SUBJECT: Inlet Hazard Areas (IHA) – Rule Amendments:

Given the necessary rule amendments required to update Inlet Hazard Area (IHA) boundaries and inlet and oceanfront erosion rates, while also considering the CRC Science Panel's recommendation to measure setbacks from the hybrid-vegetation line (HVL), the CRC established a temporary subcommittee to evaluate potential IHA rule amendment options. This review included consideration of grandfathering provisions, with the outcome intended to inform and guide the Commission's rule-making deliberations at its February meeting.

The subcommittee fully understands the rationale for using the HVL as the basis for setback measurements. The primary challenge, however, is how to implement this approach without causing existing structures to become nonconforming. Following a detailed discussion of issues, including the advantages and disadvantages of grandfathering approaches, the subcommittee will bring rule amendment recommendations back to the CRAC for discussion and, ultimately, consideration by the full Commission.

While the subcommittee supports the proposed updates to IHA boundaries and erosion rates, it discussed an alternative approach that would establish a "development line" within IHAs rather than directly measuring setbacks from the HVL. Under this concept, setbacks would continue to be measured from the actual vegetation line; however, new development would be prohibited from extending farther oceanward than the established development line. This line would generally reflect the oceanward extent of existing development. This approach would avoid creating nonconforming structures while also preventing new development from advancing seaward in response to natural accretion within an IHA.

As an additional alternative, DCM Staff discussed maintaining the current setback framework, measuring setbacks from the vegetation line, pre-project vegetation line, or measurement line, but limiting development so that it may not extend farther oceanward than the landward-most adjacent



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structure and/or beyond an existing footprint. This approach could achieve outcomes similar to the development line concept without requiring a new line to be mapped and administered through CRC rules.



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