

CALIFORNIA COASTAL COMMISSION

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W11b

MEMORANDUM

Date: February 3, 2026

To: Commissioners and Interested Persons

From: North Coast District Staff

Subject: Addendum for the Commission Meeting for Wednesday, February 4, 2026
Item W11b, Humboldt County LCP Amendment No. LCP-1-HUM-25-0060-1 (Humboldt County Outdoor Lighting Regulations)

The purpose of this addendum is to update the recommendation and findings of the January 26, 2026, staff recommendation for the above-referenced item in response to public comments received and subsequent coordination with the County on recommended suggested modifications. One public comment letter was received after publication of the staff report, from Humboldt Waterkeeper,¹ requesting that certain standards be added to the proposed regulations to better protect coastal resources from night-time lighting impacts. The additional recommended standards raised in the comment letter relate to (1) limiting Correlated Color Temperature (CCT) to 2,700 Kelvins for all outdoor lighting regardless of use type; (2) adding standards for motion detector lighting; and (3) applying different standards for agricultural uses than those applied to commercial uses.

In response to the comments received, the County planning staff acknowledged that it had been the County's intent to incorporate certain CCT standards into the regulations more broadly, which were inadvertently omitted, and County staff provided suggested "friendly modification" language to expand the CCT limit for various uses. Including such a standard ultimately is necessary to ensure conformity of the proposed regulations with the ESHA protection policies of the County's six LUPs, which direct that 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. Thus, this addendum includes supplemental ESHA findings substantiating the suggested modifications.

¹ See the correspondence packet published on the Commission's website:
<https://documents.coastal.ca.gov/reports/2026/2/W11b/W11b-2-2026-corresp.pdf>.

With the recommended changes detailed in this addendum updating and supplementing the recommended motions/resolutions, suggested modifications, and corresponding findings from those included in the staff report of January 22, 2026, staff recommend that the Commission, upon completion of the public hearing, (1) reject the IP amendment as submitted and then (2) certify the IP amendment if modified in accordance with the suggested changes set forth in this addendum.

Recommended Changes:

Staff recommend changes to the staff report of January 22, 2026, as detailed below. Changes are recommended to the (1) Motion & Resolution; (2) Suggested Modifications; and (3) Findings/Consistency Analysis sections of the report as described below:

1. **Motion & Resolution - Page 3:** Replace in its entirety the single Motion and Resolution on page 3 of the January 22, 2026 staff report with the following two motions and resolutions necessary to REJECT the IP amendment as submitted and to CERTIFY it with suggested modifications. All text shown below represents new added findings.

I. MOTIONS AND RESOLUTIONS

Staff recommends that the Commission, after public hearing, first reject the IP amendment as submitted and then approve the amendment if modified as suggested in the staff report addendum. The Commission needs to make two motions in order to act on this recommendation.

A. Denial of the IP Amendment as Submitted

Staff recommends a **YES** vote. Passage of this motion will result in rejection of the implementation program amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Motion A: I move that the Commission **reject** Implementation Program Amendment No. LCP-1-HUM-25-0060-1 C as submitted by the County of Humboldt.

Resolution A: The Commission hereby **denies** certification of Implementation Program Amendment No. LCP-1-HUM-25-0060-1 as submitted by the County of Humboldt on grounds that the implementation program amendment as submitted does not conform with, and is inadequate to carry out, the provisions of the certified land use plan. Certification of the implementation program amendment would not meet the requirements of the California Environmental Quality Act as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the implementation program amendment as submitted.

B. Certify IP Amendment with Suggested Modifications

Staff recommends a **YES** vote. Passage of this motion will result in certification of the implementation program amendment with suggested modifications and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Motion B: I move that the Commission **certify** Implementation Program Amendment No. LCP-1-HUM-25-0060-1 for the County of Humboldt if modified in accordance with the suggested changes set forth in the staff report.

Resolution B: The Commission hereby certifies the IP Amendment No. LCP-1-HUM-25-0060-1 for the County of Humboldt if modified as suggested on grounds that the implementation program, as amended, conforms with and is adequate to carry out the provisions of the certified land use plan. Certification of the implementation program amendment will comply with the California Environmental Quality Act, because 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the implementation program amendment on the environment, and 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment.

2. Suggested Modifications. Add a new “Suggested Modifications” Finding after Finding I (Motions & Resolutions) and renumber remaining report findings accordingly. All text shown below represents new added findings.

II. Suggested Modifications:

The Commission hereby suggests the following modifications to the proposed Implementation Plan (IP) amendment, which are necessary to make the requisite findings that the IP as amended conforms with and is adequate to carry out the coastal resource protection policies of the six Land Use Plans (LUPs). If the County of Humboldt accepts the suggested modifications within six months of Commission action (i.e., by August 3, 2026), by formal resolution of the County Board of Supervisors, the modified amendment will become effective upon the Executive Director’s reporting the determination that this acceptance has been properly accomplished to the Commission. Text shown below in underline and ~~striketrough~~ font denotes text that the County proposes to add or delete (respectively) to the certified IP. Text shown in **bold double underline** and ~~**bold double strikethrough**~~ format denotes text to be added through the Commission’s suggested modifications.

Suggested Modification 1: Apply the correlated color temperature (CCT) limit of 2700 Kelvins (K) specified in section 105.1.6.3 (standards for parking lots for agricultural, commercial, and industrial uses) more broadly to apply to all outdoor circulation areas for these use types. Also apply the standards of this section to “Public Facilities” uses, including, but not limited to streets:

105.1.6 Lighting for Agricultural/Commercial/Industrial/**Public Facilities** Use. All outdoor lighting fixtures for agricultural, commercial, ~~and/or~~ industrial, ~~and/or public facilities use~~ shall be installed and operated in conformance with subsection 105.1.2 and the subsection below:

105.1.6.1 Maximum Illumination.

105.1.6.1.1 Outdoor lighting fixtures shall not exceed 3200 lumens.

105.1.6.1.2 When adjacent to a residential area, lighting at the property boundary line shall not exceed 0.3 foot-candles.

105.1.6.1.3 Lighting along the public right-of-way, shall not exceed 1.0 foot-candle.

105.1.6.2 Height Limit. Lights mounted on poles or structures intended primarily for mounting lights shall not exceed a mounting height of 20 feet high.

105.1.6.3 Parking ~~Lots~~ and Circulation areas. ~~Parking lot~~ Lighting in parking lots, loading docks, walkways, ~~and~~ streets, ~~and other areas~~ shall utilize bulbs that have a CCT of 2700K or less between sunset and sunrise.

105.1.6.4 Modifications. The standards within subsection 105.1.6 may be modified with the approval of a Conditional Use Permit.

Suggested Modification 2: Add the same correlated color temperature (CCT) limit of 2700K to the Lighting for Residential Use standards of section 105.1.5 as follows:

105.1.5 Lighting for Residential Use. All outdoor lighting fixtures for residential use shall be subject to subsection 105.1.2.

105.1.5.1 Maximum Illumination. Outdoor lighting fixtures shall not exceed 1100 lumens.

105.1.5.2 Maximum CCT. Lighting shall utilize bulbs that have a CCT of 2700K or less between sunset and sunrise.

3. Changes to the Consistency Analysis Findings. Update the report findings as detailed in (i) and (ii) below to reflect the updated recommendation of denial as submitted and certification with suggested modifications. Text to be deleted is shown in **bold double underline** format and text to be added is shown in ~~**bold double underline**~~ **bold double underline** format. Page numbers referenced are from the January 22, 2026 staff report.

- i. **Page 6:** Update the findings to reflect the updated recommendation of denial as submitted and certification with suggested modifications.

~~III~~ IV Findings for ~~Approval~~ Denial of the IP Amendment As Submitted

The following findings support the Commission's ~~rejection~~ approval of the proposed Implementation Plan Amendment as submitted. The Commission hereby finds and declares as follows:

...

- ii. **Pages 12-13:** Update Finding D (Consistency Analysis) to support the basis for the suggested modifications:

During the process of drafting the proposed regulations, the County researched currently available lighting technologies and supplies available in local retail outlets to inform the standards and limits on brightness and color temperature. While the intent was to align as closely as possible with DarkSky recommendations, the County ultimately determined that a certain level of flexibility was necessary to accommodate practical considerations, such as the availability of compliant fixtures in the local retail market and the lighting needs of agricultural, residential, and commercial uses in a rural setting. As such, lumen limits and color temperature requirements were adjusted slightly to ensure that residential owners/tenants and operators of agricultural, industrial, and commercial uses could reasonably obtain fixtures and bulbs that meet safety and operational needs without compromising resource protection goals. Largely, DarkSky International recommends a maximum CCT for color tunable or field-selectable CCT products as 3000 K.² The County proposed a value slightly lower than this (2700 K) for exempt string lights (as that type of light source is not required to be fully shielded; such lights also must be turned off by 10 p.m.) and also for parking lots, which typically include an abundance of lights over a relatively large area that may be left on all night. As all other outdoor lighting sources (for all residential, agricultural, industrial, and commercial uses) must be fully shielded (no translucent fixtures allowed) and directed downwards to prevent light trespass, the regulations do not specify CCT limits for these uses.

While including the proposed CCT limit of 2700K for parking lots and string lights is appropriate, not imposing this same CCT limit for other uses and situations could result in degradation of ESHA and parks and recreation areas in the County's coastal zone, inconsistent LUP requirements. Humboldt is a rural county with limited urban areas and abundant parks and recreation areas, and low-density rural residential uses extend across areas of coastal forests, bluffs, and dunes. Many of the County's coastal commercial and industrial lands also are situated in and around beach and dune areas. In many cases, these rural residential and commercial and industrial lands and various public facilities are

adjacent to federal, state, and local parks and recreation areas.² As described in Finding B (Environmental Setting), environmentally sensitive habitat areas and parks and recreation areas (including forests, wetlands, estuaries, and other sensitive resource areas) are common throughout each of the six LUP planning areas.³ As cited above, each of the six certified LUPs include Coastal Act section 30240(b) as an enforceable policy, which directs that 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. According to DarkSky International, blue light (which arises from bulbs with color temperatures above 3000K) is more apt to scatter locally in the atmosphere and thus is prone to being redirected back toward earth as a physical manifestation of sky glow. This veil of sky glow not only reduces the visibility of stars within the natural nighttime sky, but the increased illumination cumulatively may result in disruption of biological and ecological health, according to scientific literature sources.⁴ Limits designed to control light trespass (ensuring that light does not shine beyond intended property boundary or directly into ESHA by requiring focus and shielding of light) do not on their own adequately protect ESHA and parks and recreation areas from degradation, because they do not address diffuse light from non-discrete sources that accumulates in the atmosphere from the cumulative effects of higher color temperature light sources. Furthermore, the Humboldt coast is part of the Pacific Flyway with many areas of migratory bird use, and the glare and skyglow created by scattered light can disrupt navigation, particularly during inclement weather that further scatters light and affects visibility. As a result, adding standards to restrict light's CCT is necessary for the proposed regulations to conform with and adequately carry out the above-cited resource protection policies of the six LUPs. Accordingly, Suggested Modifications 1 and 2 are needed to (1) broaden the CCT limit of 2700K specified in section 105.1.6, which applies to parking lots only, to also apply to other areas for agricultural,

² For example, in the North Coast LUP area, commercial and industrial lands are adjacent to Redwood National and State Parks, with local parks and public facilities scattered throughout the area. In the Humboldt Bay LUP area, many of the County's commercial and industrial lands are adjacent to or near the Samoa Dunes Recreation Area, the Ma-le'i Dunes Cooperative Management Area, and the Lanphere Dunes Unit of the Humboldt Bay National Wildlife Refuge. Several local County parks and public facilities occur in both the McKinleyville LUP and Humboldt Bay LUP areas as well. In the Eel River LUP area, commercial and industrial lands are adjacent to the lower Eel River and its associated riparian habitats. The King Range National Conservation Area extends across much of the South Coast LUP area, with Shelter Cove and its associated public facilities near the southern end of the King Range NCA.

³ Additionally, the Humboldt County General Plan identifies more than 20 percent of the County's 2.3 million acres as protected open space, forests, and recreation areas, including, but not limited to, four federal parks and beaches, 10 state parks (including three around Redwood National Park), 16 County parks, beaches, recreational areas and reserves. The plan describes these areas as contributing to the quality of life in Humboldt County and providing needed recreational opportunities for residents of neighboring counties and visitors from all over the world.

⁴ For example, see <https://travislongcore.net/research/light-pollution/> and <https://urbanwildlands.org/abstracts.html> among others.

commercial, and industrial uses and also extend this and the other standards of this section to “Public Facilities” uses; and (2) apply the same CCT limit of 2700K to the Lighting for Residential Use standards of section 105.1.5.

~~While CCT limits have been set slightly lower than DarkSky International recommendations, the proposed regulations set slightly higher limits for lumen requirements.~~ As submitted, the regulations cap lumen limits for residential uses at 1100 lumens (DarkSky International generally recommends 1000 lumens, though this limit varies based on property size and for multi-family uses). Consideration was given to capping the lumen limit at 1000 lumens, but the County ultimately adopted and is proposing a slightly higher limit due to local availability of light bulbs at retail stores in the area that range up to 1100 lumens. The slight variability allows users to maintain use of what is locally available by Humboldt County retailers while also maintaining the requirement that lighting be fully shielded and other requirements previously mentioned. Similarly, commercial, industrial, and agricultural (not including lighting for commercial cannabis cultivation, which is subject to a different section of previously certified IP regulations – section 313-55), uses may not exceed 3200 lumens. While consideration was given to a maximum limit of 3000 lumens consistent with DarkSky International recommendations, the County ultimately adopted and is proposing a maximum brightness level of 3200 lumens, since that bulb type is more widely available by local retailers. Lumen maximums, which are measured in foot-candles (one lumen per square foot), are measurable and therefore enforceable. If lighting creates a nuisance as defined in the proposed regulations, then it is subject to requirements for removal or replacement.

Pre-existing lighting or previously approved lighting that was consistent with County regulations prior to the adoption and certification of the subject regulations will be considered compliant so long as the County does not receive a complaint about the source as a lighting nuisance and the use or design of the light has not substantially changed over time. If the lighting source has been determined to be a nuisance, it may be subject to correction or redesign at the discretion of the Planning Director. Corrective actions could include requirements for shielding, filtering, redirecting, replacement of the fixture or source, removal, or a combination of the mentions to eliminate the lighting trespass, pollution, or nuisance.

As previously described, exempt lighting may only be considered exempt so long as it results in no light trespass to neighboring properties, the night sky, or ESHA. This includes temporary holiday decorations, fixtures that illuminate flags (subject to Federal and State flag codes), string lights that have warmer color temperatures only and are turned off by 10 p.m., emergency lighting, and motion detected lighting sources that have an activation limit of 5 minutes or less and that cannot be triggered from outside the property boundary. With the various limitations specified for meeting the exemption criteria, these exemptions will not have a significant adverse impact on ESHA or visual resources inconsistent with the certified LUPs (also, as previously noted, these light sources are expressly prohibited from impacting the night sky or adjacent ESHA).

6. Conclusion

In conclusion, the proposed amendment as ~~submitted~~ **suggested to be modified** will help preserve dark skies, reduce light pollution and light trespass, and protect coastal resources while maintaining nighttime safety and functionality. Key provisions include shielding and downward-directed lighting, lumen and correlated color temperature limits, prohibitions on high-impact lighting types, exemptions for low-impact uses, and requirements for lighting plans with new or modified development. The proposed LCPA aims to protect ESHA and wildlife, maintain scenic and visual qualities, and achieve DarkSky International principles as slightly adapted for feasibility, available market options, and Humboldt County's rural setting. Overall, the proposed IP amendment as ~~submitted~~ **suggested to be modified** conforms with and is adequate to carry out the County's six certified land use plans.