

CALIFORNIA COASTAL COMMISSION

NORTH COAST DISTRICT OFFICE
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W14a

MEMORANDUM

Date: September 8, 2026

To: Commissioners and Interested Persons

From: North Coast District Staff

Subject: Addendum to Commission Meeting for Wednesday, September 9, 2026
Item W14a, CDP Application No. 1-24-1028 (Humboldt County Public Works)

The purpose of this addendum is to respond to comments received since publication of the August 26, 2026 staff report and to make the following changes to the recommendation in response to public comments:¹

1. Add Exhibit 7 (attached) to depict the location of the public access easements north of the County beach park that are referenced in the staff report (e.g., page 45).
2. Update Special Condition 5 (as shown below) to (1) clarify that the final Adaptation Planning Study required by Special Condition 5 should consider vulnerable portions of Centerville Road south of the project area, (2) ensure that the final Adaptation Planning Study includes a right-of-way (ROW) acquisition strategy and timeline and that potential funding sources for ROW acquisitions are identified in the study, and (3) require regular reporting to the Executive Director on the applicant's progress towards developing a long-term adaptation plan for this segment of Centerville Road and County park facilities that will ensure both minimization of risk and maximum protection of public access and coastal resources in the long term.
3. Add a Response to Comments section to the Adopted Findings report, which, in addition to supplementing the revised conditions and findings suggested herein, provides additional responses to comments that will be included as part of the Commission's Adopted Findings.

¹ Correspondence received is included in a packet accessible from the Commission's website: <https://documents.coastal.ca.gov/reports/2026/9/W14a/W14a-9-2026-corresp.pdf>.

Staff continue to recommend that the Commission approve the project with the special conditions included in the staff recommendation of August 26, 2026, as supplemented and modified by the revisions described below.

I. Changes to Exhibits

- **Add new Exhibit 7 as follows:**

- Exhibit 7 – Draft OTDs Required by Special Condition 12 of CD-0004-24 / CDP 1-17-0328 (Russ Creek and Centerville Slough Restoration Project) (attached).

II. Revisions to Special Conditions

The revisions to the staff report dated August 26, 2026 are shown below (related page numbers from that report are provided for reference). Text to be deleted is shown in ~~strikethrough~~; text to be added appears in underline.

- **Update Special Condition 5 (pages 12-13) as follows:**

5. Planning for Long-Term Adaptation of Centerville Road and Centerville Beach County Park Access Facilities.

(i) WITHIN FIVE (5) YEARS OF APPROVAL OF THIS COASTAL DEVELOPMENT PERMIT (by September 9, 2031), or such additional time as the Executive Director may grant for good cause, the Permittee shall submit a final Adaptation Planning Study for the Executive Director's review and approval. The final Adaptation Planning Study will serve as an initial step to adapt Centerville Road and the Centerville County Beach Park access facilities to long-term sea level rise and coastal hazards. The Adaptation Planning Study shall evaluate the impacts of coastal hazards on public access at Centerville Beach, including potential changes to access points, facilities, ownership, and management, considering sea level rise. The Adaptation Planning Study shall identify a suite of adaptation strategies that can be implemented in the future to provide for maximum public beach access while relocating road and parking facilities threatened by coastal hazards. The final Adaptation Planning Study shall include, at a minimum, the following:

- a. An engineering study that uses the current best available science on sea level rise to identify realignment and retreat alternatives for Centerville Road (including vulnerable portions of Centerville Road south of the project area) and public parking and access facilities that considers anticipated (future) coastal hazards through at least 2100 and avoidance of shoreline armoring in project concept designs;

...

- d. Identification of further monitoring, studies, and plans needed to inform a more defined, long-term adaptation strategy for the subject site. Plans and studies shall include, but not be limited to, a right-of-way acquisition strategy and timeline and a public access plan that will provide for public access facilities as part of the long-term adaptation project, including, as feasible, parking access, viewing area(s), coastal access trail(s), signage, and other amenities;
 - e. Recommendations and plans for additional community, stakeholder, and tribal engagement during the planning and implementation of the long-term adaptation project after the final Adaptation Plan is complete;
 - f. A preliminary schedule of actions and milestones needed to successfully achieve the development and implementation of a long-term adaptation plan to safely adapt Centerville Road and Centerville Beach County Park access facilities by the estimated time period that adverse impacts to current road and access facilities will become significant (i.e., by 2050) and to achieve compliance with the requirements of Special Condition 4-c;
 - g. Identification of funding sources to support further studies, right-of-way acquisitions, and ultimately the development of final plans and permit applications for a long-term adaptation project for Centerville Road and Centerville Beach County Park access facilities; and
 - h. The applicant shall recommend measures that demonstrate accountability (e.g., coordinating regular meetings with relevant agencies, proactively applying for funding, ~~briefing the Commission periodically on status of compliance~~) to the schedule in item (f) above to ensure a long-term project can be implemented no later than the end of the authorization period(s) specified in Special Condition 4 above.
- (ii) Every other year beginning two years after approval of final Adaptation Planning Study, the applicant shall provide a written progress report to the Executive Director on the applicant's progress towards developing a long-term adaptation plan for this segment of Centerville Road and the Centerville Beach County Park parking facilities that will ensure both minimization of risk to the roadway and parking facilities and maximum protection of public coastal access and coastal resources in the long term.
- (iii) The applicant shall implement the final approved Adaptation Planning Study and any associated recommended monitoring, studies, and plans needed to inform a more defined, long-term adaptation strategy for the subject site. Any proposed changes to the approved final study shall be reported to the Executive Director. No changes to the approved final study shall occur without a Commission approved amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

III. Revisions to Findings

- **Add a “Responses to Comments” finding**
 - Add the following “Responses to Comments” section as Finding IV-N of the adopted findings report (and thus renumber the CEQA finding as Finding IV-O). Note: For readability, all text shown below is new text (not shown in strikethrough/underline to indicate revised text).

N. Responses to Comments

In addition to revisions made to the August 26, 2026 staff report in response to written comments received after publication of the report, following are additional responses included as part of the Commission’s Adopted Findings. Comments received are included in a correspondence packet.²

Comments Regarding Length of Permit Authorization Period

Comments received recommend shortening the authorization period of Special Condition 4(a) from twenty (20) years to ten (10) due to the pressing need for longer-term adaptation. The comment letter “questions whether a 20-year permit is necessary or ideal, considering conditions on the beach will worsen as the armoring comes under increasing stress.”

The County addressed the timeline for planning and relocating County road and park facilities in a letter provided in January 2026 (Exhibit 3):

Inland relocation of Centerville Road and creation of a new or substantially modified beach access point for Centerville Beach will be required in the future to adapt to changing shoreline conditions. Managed retreat will take a long time and will be expensive. The process of moving infrastructure back from the shoreline near Centerville Beach will require extensive conversations with the community of the Eel River Valley and landowners along Centerville Road. Inland relocation will depend on having a community-supported plan, sufficient funding, and willing sellers of property or right-of-way (with condemnation as a last-resort option). Funding for a project of this magnitude will depend on state or federal funding and will likely require at least 20 years. Neither inland retreat of the road nor creating a new inland beach access point are feasible at this time. Therefore, the proposed project is the only feasible alternative for preserving coastal recreation access at Centerville Beach and maintaining uninterrupted road access to residential and public properties south of the project site. Interim protection of the beach access point and county road

² Accessible from the Commission’s website:
<https://documents.coastal.ca.gov/reports/2026/9/W14a/W14a-9-2026-corresp.pdf>.

are critically important to allow time for developing a successful retreat strategy.

Based on the Commission's experience with timelines for other adaptation planning studies for other projects (e.g., the Caltrans Eureka-Arcata 101 Corridor Project permitted under CDP 1-18-1078), 20 years is a more realistic timeframe than 10 years for completing not only planning (for which there is currently no dedicated funding source) but also designing, funding, and implementing an adaptation planning project of this scale. Coupled with the requirements of Special Condition 5, requiring the County to regularly report to the Executive Director on the applicant's progress towards developing a long-term adaptation plan and the project's estimated 25-year lifespan, the Commission finds that authorizing the proposed development for a 20-year period following permit approval (until September 9, 2046) is appropriate.

Comments Regarding Adaptation Planning Study Requirements

Comments received further recommend that the Adaptation Planning Study required by Special Condition 5 include certain additional requirements. Specifically, the comments recommend that the plan should (1) be required to consider vulnerable portions of Centerville Road south of the project area, (2) ensure that a right-of-way (ROW) acquisition strategy, timeline, and funding sources are considered, (3) require more regular reporting on the applicant's progress towards developing a long-term adaptation plan for this segment of Centerville Road and the Centerville Beach County Park parking facilities. These recommendations have all been integrated into Special Condition 5 as adopted in these adopted conditions and findings.

Comments Regarding Mitigation for Armoring Impacts

Comments received also recommend strengthening the mitigation requirement for the project's beach and armoring impacts by requiring the County to accept the "offer to dedicate" (OTD) public access and beach access easements required by Special Condition 12 of CD-0004-24 / CDP 1-17-0328 (Russ Creek and Centerville Slough Restoration Project). As previously discussed in the "Mitigation" section of Finding IV-E (Coastal Hazards), Special Condition 12 of CD-0004-24 / CDP 1-17-0328 requires the formal offer and dedication of public access and beach access easements for passive public recreational use that extend over 20 acres of beach and wetland areas immediately north of Centerville Beach County Park as well as over an additional 100-foot-wide, ~5-mile-long lateral easement adjacent to the mean high tide line north of the County beach park to the mouth of the Eel River. Exhibit 7 shows *draft* formal graphic depictions and legal descriptions of the OTD easements (OTDs). These OTDs, from three different landowners, are in process of being formally drafted, recorded, and offered for dedication for public passive recreational use. Once offered, they may ultimately be accepted by the County (or another suitable accepting entity) and added to Centerville Beach County Park, which would greatly expand the park boundaries (the total size of the additional easement areas is estimated to be an additional ~80 acres directly north of the existing 2-acre park). However, in the absence of timely consideration and acceptance of the OTDs, the OTDs could lapse. The comment letter

thus urges the Commission to condition this permit on the County's commitment to accept the easement(s) once the OTDs are recorded.

The County has stated its willingness to consider accepting the OTDs, so it is the Commission's understanding that the County will consider OTD acceptance in good faith. As discussed previously (Finding IV-E-5(a) (Approvable Mitigation)), appropriate feasible mitigation has been required for the project's armoring impacts, including (1) ensuring all public recreational access areas and features remain in good condition and available for public use during the project authorization period; (2) implementing additional design changes and added public access amenities (e.g., signs, benches, etc.), (3) ensuring that project elements that will be used to facilitate, manage, and provide public access to and through the approved project be planned, sited, and designed to maximize passive public recreational access by maintaining existing roadside pullout parking, by requiring that pedestrian access be available to the general public 24 hours a day free of charge, and by designing the facility to disallow motorized vehicular access while accommodating access for pedestrians and beach wheelchairs; (4) requiring development of a comprehensive Public Access Management Plan for the County beach park that clearly identifies all parameters for use of the public access areas, improvements, and amenities and ensures that facilities will be maintained in a manner that maximizes public use and enjoyment; and (5) developing the planning and design for long-term adaptation of the County access facilities. Given these requirements, the proposed project as conditioned will result in tangible public recreational access improvements both in the near-term and long-term to offset the identified armoring impacts.

EXHIBIT C

RAYL TRUST OFFER TO DEDICATE BEACH ACCESS AND PUBLIC ACCESS EASEMENTS

NOTE: THIS EASEMENT AREA IS AMBULATORY DUE TO CHANGES IN THE LOCATION OF THE MEAN HIGH TIDE LINE. THE EASEMENT BOUNDARIES SHALL MOVE INLAND WITHIN PERMITTEES PROPERTIES AS NEEDED TO MAINTAIN A 100 FOOT EASEMENT AREA INLAND OF THE MEAN HIGH TIDE LINE. THE MEAN HIGH TIDE LINE SHOWN HEREON IS ESTIMATED AT ELEVATION 4.44 FEET NAVD 88 PER THE CALIFORNIA COASTAL COMMISSION IN 2026. THIS LINE IS UNDERSTOOD TO BE AMBULATORY FROM DAY TO DAY.

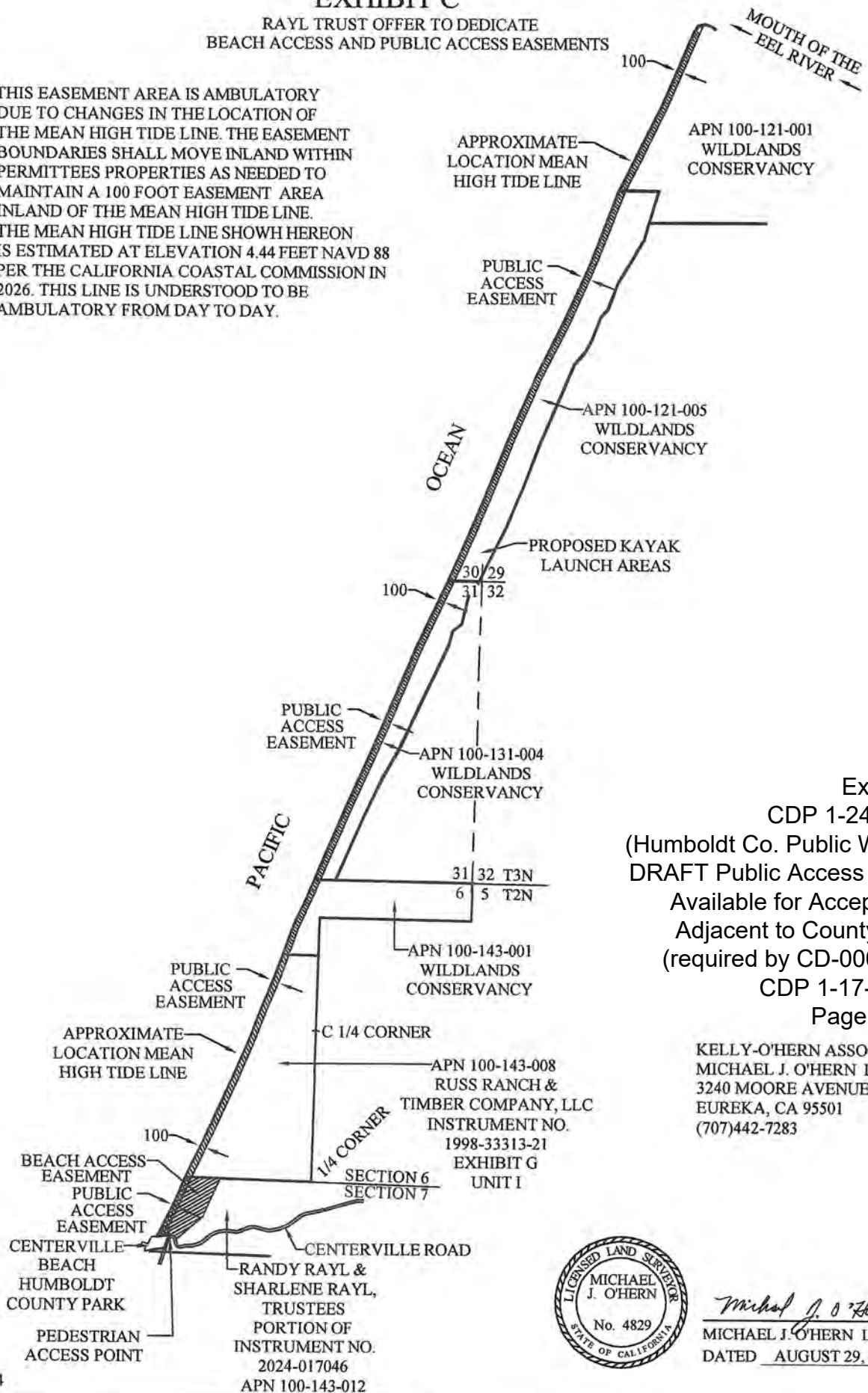


Exhibit 7
CDP 1-24-1028
(Humboldt Co. Public Works)
DRAFT Public Access OTDs
Available for Acceptance
Adjacent to County Park
(required by CD-0004-24/
CDP 1-17-0328)

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(707)442-7283



Michael J. O'Hern
MICHAEL J. O'HERN LS 4829
DATED AUGUST 29, 2026

RAYL TRUST

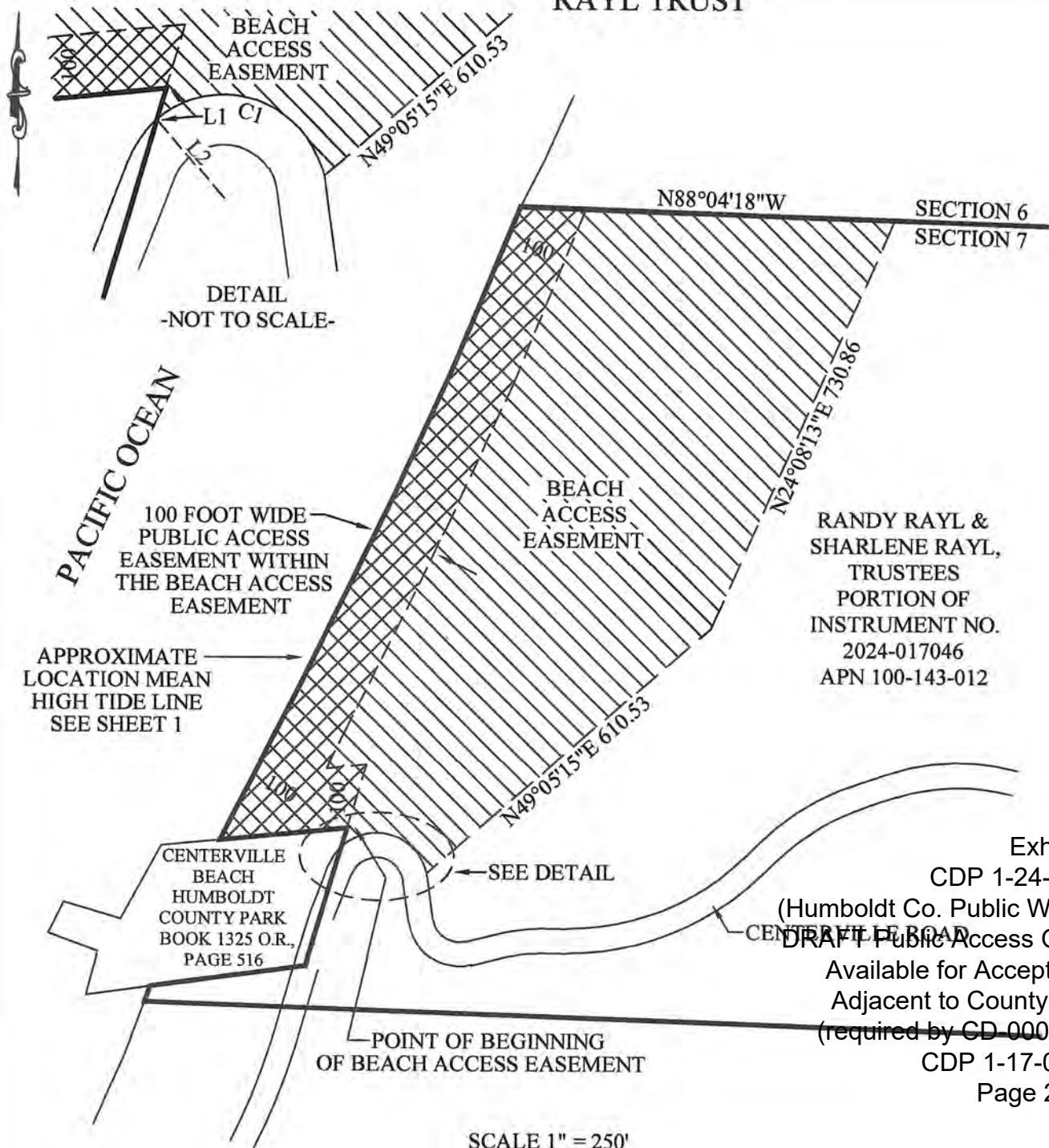
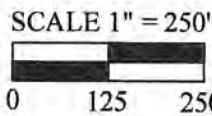


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LINE TABLE

	BEARING	DISTANCE
L1	S16°46'16"W	30.90
L2	S43°00'58"E RADIAL	

CURVE TABLE

	RADIUS	DELTA	LENGTH
C1	83.50	120°40'51"	175.87

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AUGUST 29, 2026
 SHEET 4 OF 4

EXHIBIT C

RUSS RANCH & TIMBER COMPANY
OFFER TO DEDICATE PUBLIC ACCESS EASEMENT

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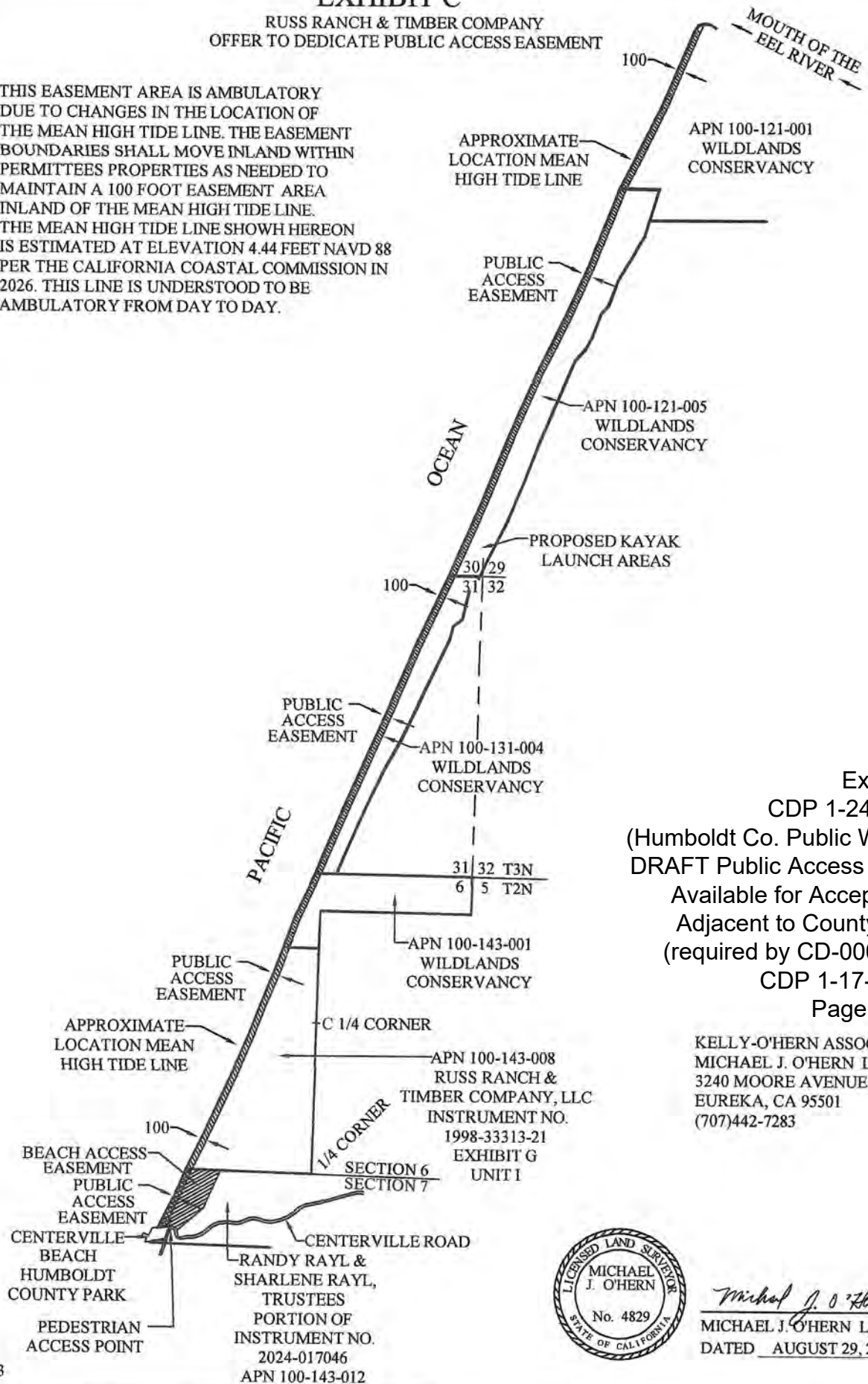


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DATED AUGUST 29, 2026

RUSS RANCH & TIMBER COMPANY

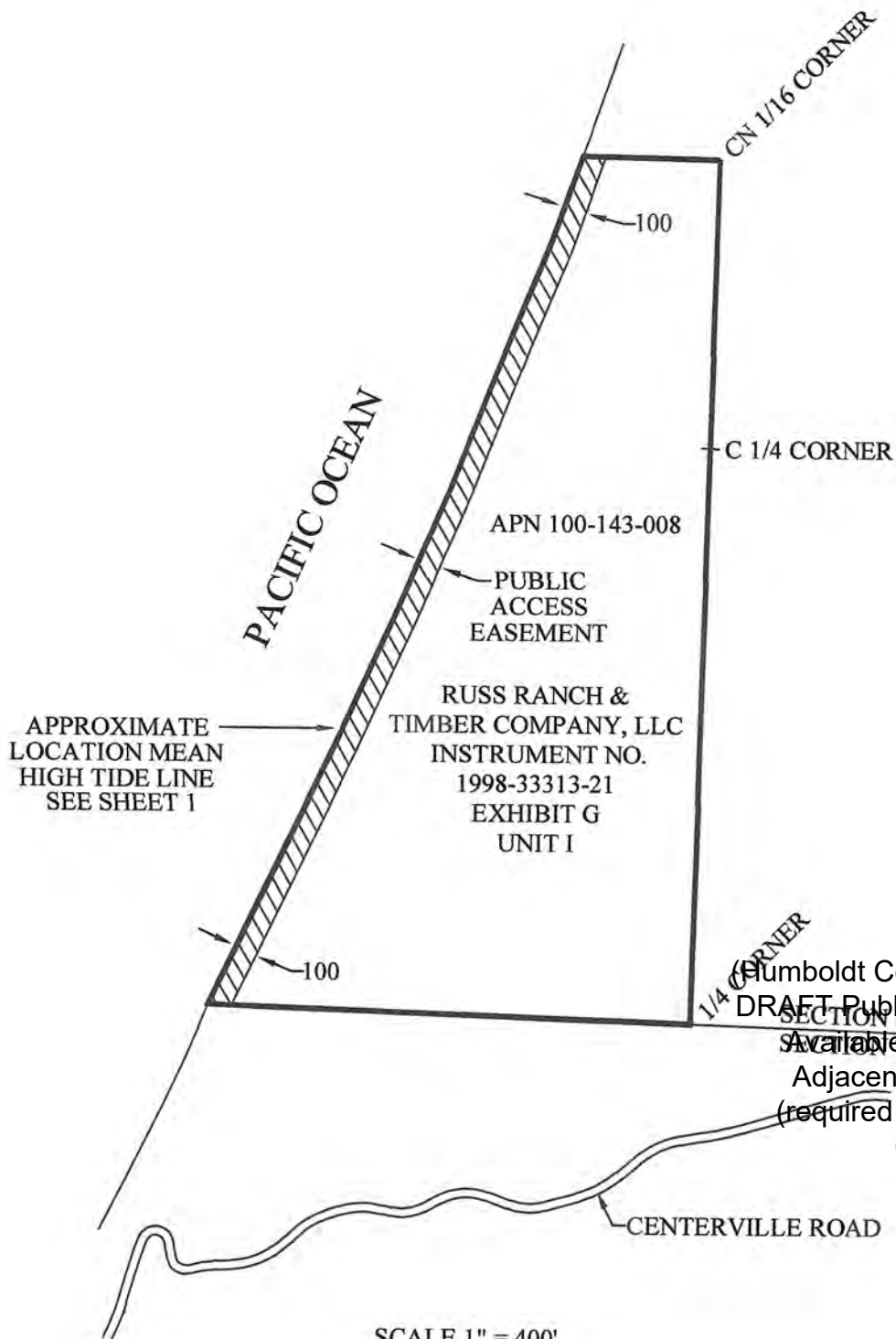


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AUGUST 29, 2026
SHEET 3 OF 3

EXHIBIT C

WILDLANDS CONSERVANCY OFFER TO DEDICATE PUBLIC ACCESS EASEMENT

NOTE: THIS EASEMENT AREA IS AMBULATORY DUE TO CHANGES IN THE LOCATION OF THE MEAN HIGH TIDE LINE. THE EASEMENT BOUNDARIES SHALL MOVE INLAND WITHIN PERMITTEES PROPERTIES AS NEEDED TO MAINTAIN A 100 FOOT EASEMENT AREA INLAND OF THE MEAN HIGH TIDE LINE. THE MEAN HIGH TIDE LINE SHOWN HEREON IS ESTIMATED AT ELEVATION 4.44 FEET NAVD 88 PER THE CALIFORNIA COASTAL COMMISSION IN 2026. THIS LINE IS UNDERSTOOD TO BE AMBULATORY FROM DAY TO DAY.

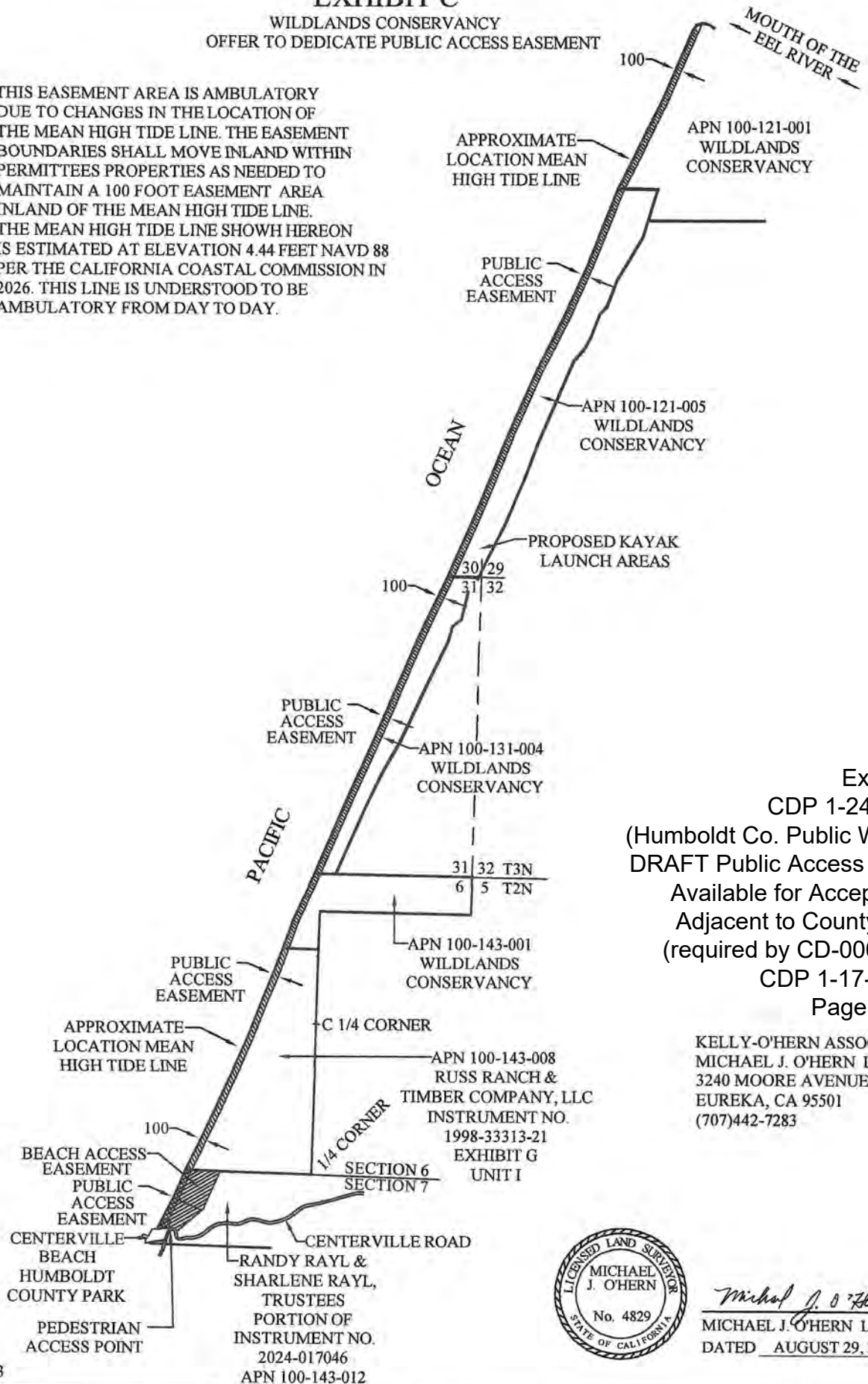


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MICHAEL J. O'HERN LS 4829
DATED AUGUST 29, 2026

WILDLANDS CONSERVANCY

NOTE: THE NORTHERLY LIMIT OF THE WILDLANDS CONSERVANCY LATERAL ACCESS IS THE MEAN HIGH TIDE LINE AT THE MOUTH OF EEL RIVER WITHIN WILDLANDS CONSERVANCY OWNERSHIP.

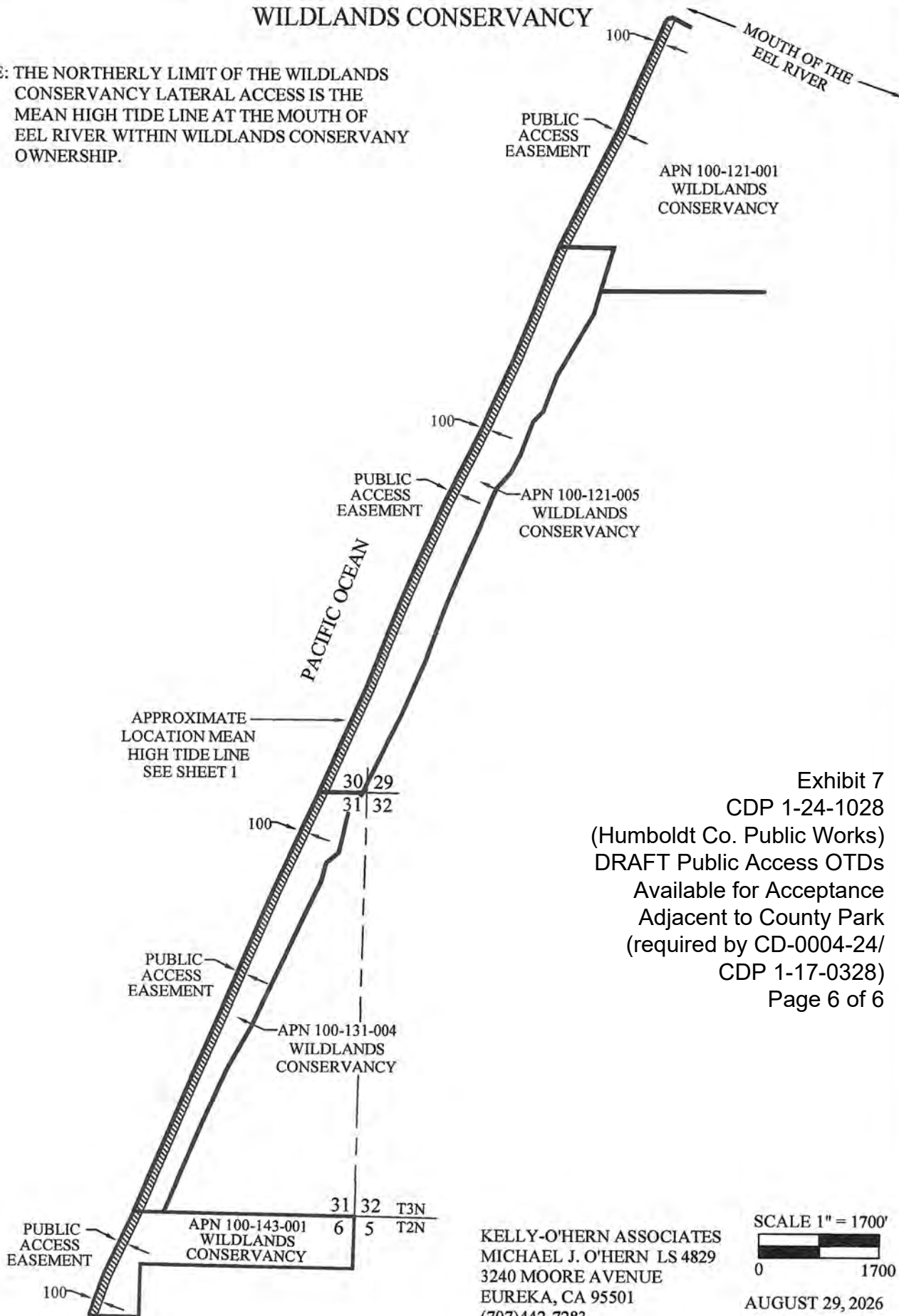


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SCALE 1" = 1700'
0 1700

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SHEET 3 OF 3