



September 4, 2026

Delivered via email

To: Meagan Harmon, Chair, California Coastal Commission  
CC: Kate Huckelbridge, Executive Director, California Coastal Commission,  
North Coast District Director Dan Carl

**Re: W14a Application No. 1-24-1028 (Humboldt County Public Works Centerville Road Reconstruction Project)**

Dear Chair Harmon, Commissioners, and North Coast Staff,

Surfrider Foundation submits the following comments regarding the proposed reconstruction and armoring of Centerville Road. We appreciate that Humboldt County first pursued moving this road inland, away from the shoreline, and that the County has said it intends to keep pursuing that solution. We also appreciate North Coast District staff's work on this difficult application. Centerville Road provides the only meaningful coastal access along this stretch of beach, including to the Lost Coast Headlands, and Centerville Beach has long been a documented surf break. Staff have tried to protect both the beach and the access, and much of what they recommend deserves the Commission's support.

**What Surfrider supports**

We support several elements of the staff recommendation, including staff's correction of the project footprint from 1.2 to 1.7 acres of beach. We also support the limited authorization period, although **we ask that the authorization period be shortened from 20 years to 10 due to the pressing need for longer-term adaptation.**

Equally important is the requirement that the County return to the Commission with a plan to remove the armoring and restore the site before that authorization ends, tied to the separate requirement for an adaptation planning study that identifies realignment options, looks ahead to 2100, and avoids armoring in its concepts.

These permit conditions require the armoring to be truly temporary, paving the way for a more adaptive solution before the harm becomes irreversible.

Surfrider also supports the prohibition of any additional armoring to protect this project, along with the requirements to bury the rock under sand, revegetate the area with native plants, and mitigate habitat losses at a three-to-one ratio. **Covering rock with sand does not lessen the harm of armoring, however.**

## **Time is short**

The record is candid about how little time this project buys. The applicant's analysis estimates that by 2050, the summer beach will have eroded back to the roadway, permanently exposing the road to wave action, and the revetment's service life ends around the same time.

The project is designed to withstand a 25-year event, which means an event with a 4 percent chance of occurring (or being exceeded) in any given year. That threshold will likely be reached or exceeded, at least once, over a 20-year authorization period. The project's design standard also weakens over time, because the road elevation is fixed while sea level is not. Staff project 1.4 to 1.6 feet of sea level rise in this region by 2050. Erosion rates may accelerate beyond what the County has anticipated. We are already seeing faster rates of sea level rise and higher tides than predicted along California's coast as a result of El Niño, including in Humboldt County. This serves as an indicator that reality is likely to be worse than current predictions.

Of course, we are not arguing for a larger or longer-lasting structure. We concur with staff that a bigger design would result in more beach loss, not less, and a more difficult removal. But the County has told the Commission that relocating this road inland will likely require at least 20 years. Surfrider questions whether a 20-year permit is necessary or ideal, considering conditions on the beach will worsen as the armoring comes under increasing stress.

### **Recommendation 1: Shorten the authorization period to 10 years**

For the above-mentioned reasons, we ask that the Commission shorten the authorization period to 10 years with the adaptation study due in three years. Special Condition 4(d) already conditions any extension on demonstrating meaningful progress toward a non-armoring alternative. We ask that this be strengthened to require documented progress on right-of-way acquisition, including entering a condemnation process if no other pathway is feasible.

The recommendations that follow apply regardless of the authorization period the Commission adopts. If the 20-year term is retained, the second becomes essential.

### **Recommendation 2: Require regular progress reports on moving the road inland**

The staff report is clear that relocating this road inland is the durable solution, that it would protect access through at least 2100, and that it has been blocked by a private landowner unwilling to sell or grant an easement. The County has said it needs more time to pursue every available option, including condemnation.

As written, the County submits an adaptation planning study in 2031 and is not required to follow up until the removal application is due. **That would be a 14-year gap under the proposed authorization term.** Even under a shortened term, a gap of several years would remain. Surfrider sees no evidence

that allowing such long gaps without any required check-ins ensures the armoring eventually comes out – in fact, the longer a jurisdiction is allowed to do nothing, the more likely delays and “emergencies” will result.

The County offered to provide written updates to the Commission in a January 2026 letter to staff. **We encourage the Commission to accept that offer and build it into Special Condition 5.** We also encourage the Commission to require the adaptation planning study to address how the County will actually obtain the land it needs, including a right-of-way acquisition strategy and timeline. The study currently requires engineering work, outreach, and a search for funding. It should also address acquisition, since nothing else can occur without it. That is the step that has stalled this effort for years, and led to this maladaptive armor-in-place project that is now before the Commission.

### **Recommendation 3: Extend the adaptation study to the road south of the project site**

Staff found that portions of Centerville Road south of the project area sit less than 25 feet from an eroding cliff edge, with an average retreat of nearly 5 feet per year, and could be threatened within roughly five years. That is the same timeframe driving this application.

The adaptation planning study is currently scoped to this bend in the road and the park facilities. A plan that solves for this location without addressing the failing road further south will not preserve access to the Lost Coast Headlands, Fleener Creek Trail, and Guthrie Creek Trail. These are the same access points staff relies on to support approving this project under the Coastal Act’s public access provisions. An eventual County realignment project will need to address the entire threatened section in order to be durable.

For these reasons, we encourage the Commission to direct that the study include the vulnerable segments south of the project area within its scope.

### **Recommendation 4: Strengthen the beach-area side of the mitigation package by supporting acceptance of the public access easement**

Staff calculate that this project will permanently cover 1.7 acres of beach, growing to roughly 2.2 acres as the shoreline is squeezed against the fixed structure. The access improvements at the beach total about a quarter acre.

We do not dispute that keeping Centerville Road open protects meaningful public access, including to Lost Coast Headlands. But it is also a benefit of maintaining access that already exists. The impact being offset is the permanent loss of beach, and the mitigation package does not currently add beach area back to public use.

There is one mechanism in the record that would. The Russ Creek and Centerville Slough Restoration Project approved by the Commission last August requires the landowners to record an offer to dedicate (OTD) a public access easement across five miles of beach between the mouth of the Eel River and the beach access being modified in this project, at Centerville Beach.

If accepted, this could result in a substantial addition to public beach access in exactly the place this project takes the beach away. That offer has to be recorded before the restoration permit can be issued, but what happens next is less certain. The offer could lapse if no one accepts it within a 21-year window. The County has said it is willing to discuss holding the easement, but no commitments have been made and nothing currently requires it to decide.

We encourage the Commission to condition this permit on the County's commitment to accept the easement once the OTD is recorded.

## **Conclusion**

Humboldt County has the least armored coastline in California – in fact, Surfrider has been unable to identify any coastal armoring outside of Humboldt Bay. If approved, this will be one of the first rock revetments on the North Coast. The conditions agreed to in this CDP, and whether they are carried out in good faith, will be extremely important in determining whether Humboldt responds to sea level rise in a proactive, adaptive manner or with armoring that kills beaches. We appreciate that staff have recommended a time-limited approval with a clear expectation that the road will eventually move. The recommendations above are offered to make the mitigation match the loss and to keep the County moving toward the solution it has already identified.

Thank you for your consideration.

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