

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
301 E Ocean Blvd, Suite 300  
Long Beach, CA 90802  
(562) 590-5071



May 15, 2025

Jason Lee, Program Manager, Capital Project Delivery  
Orange County Transportation Authority  
550 South Main Street P.O. Box 14184  
Orange, CA 92863-1584

**Re: Emergency Permit No. G-5-23-0013 Request**

Dear Mr. Lee,

On April 10, 2025, the Coastal Commission's South Coast District Office issued Emergency Coastal Development Permit (ECDP) No. G-5-25-0013 for development including, in relevant part, placement of rock and sand at OCTA's Priority areas 1 & 2 to provide needed protection of the rail. On May 14, 2025, your team met with Commission staff and shared a presentation identifying updated survey data, changed circumstances, and additional public safety concerns that necessitate project modifications. Additional information was provided today, May 15<sup>th</sup>, that together with previously submitted information documents your conclusion that emergency conditions exist for the proposed work areas. The proposed modifications are as follows: abandon rock slope repair along the northern portion of the Area 1 site, add a 530 ft. long segment of rip rap slope (Area 1a) between Areas 1 and 2 to the repair footprint, and removal of an existing damaged culvert headwall and associated debris at the culvert outlet in Area 2 (MP 204.18) and temporarily extend the culvert 6 ft. seaward. OCTA is requesting authorization to implement these changes immediately as work in these areas is ongoing.

Regarding the rock repair location modifications, given that the photos provided demonstrate a need for rapid repair, the total tonnage of rock needed for the proposed repairs in Areas 1 & 2 will not change, and the new part of the site is coterminous with Areas 1 & 2, Commission staff finds these plans substantially conform with the Executive Director's emergency authorization. The changes to the damaged culvert appear to be needed to accommodate the approved rock slope repairs at that location and, if done in conjunction with that work, would reduce impacts as compared to a separate culvert repair project. In addition, as proposed, the culvert extension is an interim measure and the OCTA's proposed removal of materials that are blocking the culvert mouth would facilitate culvert function. Thus, Commission staff authorize OCTA to move forward with the proposed project modifications as described herein and in further detail in the materials submitted on May 14-15, 2025. All conditions of approval for ECDP No. G-5-25-0013 continue to apply to the revised project, including the need for as-built plans and submittal of a follow-up CDP that reflects the full scope of the emergency development conducted.

Feel free to contact me, [dani.ziff@coastal.ca.gov](mailto:dani.ziff@coastal.ca.gov), with any questions.

Sincerely,

Dani Ziff for:

A handwritten signature in black ink, appearing to read "Kate Huckelbridge".

Dr. Kate Huckelbridge  
Executive Director