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Tom Lai, Director
Marin County Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
Via Electronic Mail

Re. Marin County Local Coastal Program

Dear Mr. Lai,

The Environmental Action Committee of West Marin (EAC) submits the following comments regarding the Marin County Local Coastal Program (LCP) amendments in our capacity as a member of the Coastal Communities Working Group (CCWG).

Since 2008, we have been actively involved in the County's LCP amendment process, participating in both County and California Coastal Commission (Coastal Commission) public hearings.

First, we would like to point out that there has not been adequate engagement and communication with stakeholders who are part of the CCWG concerning the proposed environmental hazards draft language. At the April 22, 2021 CCWG meeting, the County presented an overview of key updates including proposed environmental hazards language for the LCP amendments. We were surprised on June 17th (see attached email) when we received a note from County staff to submit comments by June 18th or June 23rd at the latest. Upon review of the April 22nd meeting and related written correspondence from the County, we were unable to find any mention of a deadline for receipt of CCWG stakeholder comments.

In addition, we learned from the Coastal Commission staff that a meeting between the County and the Coastal Commission staff is taking place on July 20th, so we are unclear why our CCWG comments are needed in such a rush.

As a result of this arbitrary deadline, EAC did not have sufficient time to provide detailed written comments on the draft environmental hazards policies proposed by Marin County.

We imagine other members of the CCWG may be in a similar situation. That being said, we do very much want to engage in this process, and we are providing some brief comments below.

Comments on Marin County's Draft Environmental Hazards Amendments

Overall, we are concerned with the general direction of the environmental hazards update, which is generally less protective of coastal resources – and largely inconsistent with the California Coastal Act (Coastal Act). We take particular issue with the emphasis on sea walls or armoring as a coastal adaptation “solution.” As demonstrated by the prevailing science, coastal armoring leads to the loss of beach, habitat, and public access, all of which are afforded the highest level of protection by the Coastal Act.

EAC continues to support the Coastal Commission's 2016 suggested modifications¹, as we did in 2016 at the Coastal Commission hearing in Half Moon Bay. There is no reason why these modifications need to be substantively changed unless perhaps they are strengthened to better protect coastal resources, especially given the extremely alarming projections for sea level rise and other hazards for our region and state, and given the state's commitment to 30x30 goals formalized in Governor Newsom's Executive Order N-82-20.²

The environmental hazards 2021 language, as proposed by Marin County, is insufficient to protect coastal resources from the impacts of the climate crisis. If Marin County is unwilling to abandon its insistence on coastal armoring as the primary adaptation strategy, EAC is reluctant to engage with the Community Development Agency further on the hazards policies. An unwillingness to look beyond armoring demonstrates the County is focused on short-term goals, ignoring the coast's long-term overall health, the Coastal Act, and the importance of public access, which appears to be in conflict with the excellent work of the Marin County Sustainability Team to proactively address and identify adaptation, mitigation, and sequestration needs and opportunities in our coastal communities.

Marin County's Plan to Advance the Local Coastal Program Amendments without Environmental Hazards

We are strongly opposed to the Board's proposed action on July 13th that would advance the LCP amendments without the environmental hazards chapter. The County should give priority to finishing environmental hazards and appropriately implement the *full* LCP amendments as promised to the Coastal Commission and the public in 2016. The 1981 environmental hazards chapter is outdated and the partial rollout will likely result in inconsistent and inequitable policy implementation.

This piecemeal approach by the County to package the 1981 LCP along with the non-hazards LCP amendments inadequately protects coastal resources. As you are fully aware, the purpose of the LCP is to carry out the coastal resource protection policies of the Coastal Act. By approving LCP amendments with outdated environmental hazards language, the Board of Supervisors circumvents the Coastal Act's intent. The environmental hazards chapter of the LCP is integral to the success of coastal protection; therefore, no version of an LCP should be approved without it.

Thank you for your dedication to the Marin County LCP amendment process and your continued work to engage with stakeholders. We look forward to continued work on this important topic.

Sincerely,



Morgan Patton, Executive Director



Bridger Mitchell, Board President

¹ See Coastal Commission Staff Report, prepared for the November 20, 2016 Hearing, Exhibit 14, <https://documents.coastal.ca.gov/reports/2016/11/w10a-11-2016.pdf> including C-EH-12 Standards for Shoreline Protective Devices (pp. 2348-9).

² <https://www.gov.ca.gov/wp-content/uploads/2020/10/10.07.2020-EO-N-82-20-.pdf>.

cc: Leslie Lacko, Senior Planner, Marin County
Jack Liebster, Planning Manager, Marin County
Supervisor Dennis Rodoni, Marin County
Rhonda Kutter, aide to Supervisor Dennis Rodoni, Marin County
Lorenzo Cordova, aide to Supervisor Dennis Rodoni, Marin County
Stephanie Rexing, North Central Coast District Manager, California Coastal Commission
Sara Pfeifer, Coastal Program Analyst, California Coastal Commission



Ashley Eagle-Gibbs <ashley@eacmarin.org>

EAC Comments on the LCP

Lacko, Leslie <LLacko@marincounty.org>
To: Ashley Eagle-Gibbs <ashley@eacmarin.org>
Cc: "Liebster, Jack" <JLiebster@marincounty.org>

Thu, Jun 17, 2021 at 12:20 PM

Hi Ashley:

I'm writing to see if the EAC has comments for us on the draft LCP Environmental Hazard policies that we presented to the CCWG on February 22nd. As you may recall, we asked for comments from the CCWG members and set a deadline of June 18th. We are working on a tight schedule with the Coastal Commission. The latest possible date that we can accept comments is June 23rd. I know that EAC members recently spoke with other County staff about the LCP, but written comments on the draft Environmental Hazards policies would be really helpful in our process.

Please feel free to reach out with any questions.

-Leslie

Leslie Lacko

Senior Planner

she/her ([why pronouns?](#))

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