



August 6, 2021

Chair Steve Padilla
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
Via Electronic Delivery: NorthCentralCoast@coastal.ca.gov

Cc: Stephanie Rexing, North Central Coast District Manager
Sara Pfeifer, Coastal Planner

Re: Item Th14a Marin County Local Coastal Program Update – Informational Item

Dear Chair Padilla,

On July 13, 2021, the Marin County Board of Supervisors moved to put all LCP amendments into effect in 30 days without updating its critical environmental hazards chapter, which is still pending. **Surfrider is urging Marin County and Coastal Commission staff to proceed with review and certification of the Environmental Hazard (EH) section of the comprehensive local coastal program (LCP) update.**

Marin County's LCP was originally approved in 1981 — sea level rise science has emerged since then and Marin County has completed a vulnerability assessment and adaptation plan. The County also has a complete draft update of EH policies. Further delays to certifying updated EH policies will be costly to the coast, impacting vital coastal resources and recreational opportunities for decades to come. The permit and planning decisions being made today under outdated hazard policies will impact Marin's coast for decades to come.

It is now understood that the next ten years provide a brief moment of opportunity to prepare before sea level rise begins to dramatically accelerate. Marin County has the chance now to formalize its vision for the future and to avoid such damaging uncertainties. We cannot continue to perpetuate a maladaptive pattern of development that will jeopardize public coastal resources. Updating the LCP as soon as possible is particularly important when it comes to protecting existing recreational opportunities and habitat resources.

The County's hazard policies should prioritize nature based solutions as suggested in the County's collaborative report, *Sea Level Rise Adaptation Framework - A user*



*guide to planning with nature as demonstrated in Marin County*¹. The report suggests nature based projects and transfer of development rights (TDR) as adaptation priorities. These approaches will take a long time to implement, particularly TDR programs, which are complex and require significant staff time to implement. Updating the hazard policies sooner than later will initiate and formalize this important priority-setting work achieved in the adaptation planning process.

The County's adaptation plan should be periodically updated with the latest sea level rise science; however, further delays to certification of EH policies due to a lack of scientific certainty or emerging data are not warranted. The trend of sea level rise is clear – sea levels are increasing. Given the urgency of the situation, we encourage the County to move forward with certifying EH policies sooner than later.

Marin County is aware of its extensive coastal risks and has a responsibility to plan and adapt wisely. We strongly encourage Coastal Commissioners and staff to move forward with the EH updates as soon as possible.

Sincerely,

Mandy Sackett
California Policy Coordinator
Surfrider Foundation

¹ Point Blue Conservation Science, San Francisco Estuary Institute, and County of Marin. 2019. Sea Level Rise Adaptation Framework - A user guide to planning with nature as demonstrated in Marin County. Point Blue Conservation Science (Contribution #2239), Petaluma, CA. San Francisco Estuary Institute (Publication #946), Richmond, CA. Version: 1.0, August 2019