

**CALIFORNIA COASTAL COMMISSION**

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**December 6, 2013**

Jack Liebster, Planning Manager  
Marin County Community Development Agency  
3501 Civic Center Drive, Room 308  
San Rafael, CA 94903-4157

**Subject: Marin County Local Coastal Program Update (LCP-2-MAR-13-0224-1)**

Dear Mr. Liebster:

We would first like to thank you and your staff for all of your open and inclusive coordination with Commission staff over the past few years in the development of the County's Local Coastal Program (LCP) update. We much appreciate all of the early consultation and interaction in which we discussed the myriad of important and complicated coastal resource issues faced by the County, and ultimately addressed in the proposed LCP update. We believe that this early coordination has enabled us to address many issues in a mutually agreeable way, and it has served to greatly narrow the range of potential issues moving forward. We are committed to continuing to work very closely with County staff to even further narrow issues as we head toward a Coastal Commission hearing on the proposed LCP update, which, as we have discussed, we hope to hold in May of 2013.

On November 7, 2013, we received the County's submittal proposing to amend both the existing certified LCP's Land Use Plan (LUP) and Implementation Plan (IP). The proposed amendments seek to update and refine numerous policies and code sections, including those related to agriculture, environmental hazards, biological resources, public facilities and services, and allowable uses and standards for development. Please note that the proposed amendment has been given the Commission tracking number of Marin County LCP Amendment LCP-2-MAR-13-0224-1.

The Coastal Act and the Commission's regulations require that proposed LCP amendment packages include "materials sufficient for a thorough and complete review" (Coastal Act Section 30510(b), California Code of Regulations (CCR) Sections 13552 and 13553) before an amendment submittal can be deemed submitted (also commonly referred to as "filed"). We have reviewed the materials that the County submitted, and are in need of additional clarification, information, and materials to adequately analyze the proposed amendment for consistency with the Coastal Act and to schedule it for a Commission hearing, and thus we have not yet filed this amendment request. We note that much of the requested information below emanates from our prior discussions on these topics, but that some of it is simply related to the package of materials submitted recently which raises other questions not necessarily discussed in the past. In both cases, we stand ready to further explain any particular request, including to discuss ways in which the requested information can be provided or packaged so as to limit the expenditure of limited County time and resources, and to facilitate its review. Thus, please submit the following:

**Marin County Local Coastal Program Update (LCP-2-MAR-13-0224-1)**  
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1. **Proposed Amendment.** Please clarify whether the proposed amendment is intended be a complete replacement of the existing certified LCP, or whether it is intended to modify the existing LCP.
2. **Proposed Amendment Documents.** We will need multiple copies of the proposed amendment documents for our review, for public review, and for Commission hearing purposes. Per item number 1 above, if the amendment is intended to be a complete replacement of the existing LCP, please submit four complete hard copies of: a) the existing LCP; b) materials clearly describing the manner in which existing LCP provisions are reflected in the new LCP; and c) the proposed new LCP. If instead the amendment is intended to make changes to the existing LCP but not replace it entirely, please submit four hard copies of: a) materials clearly describing the manner in which existing LCP provisions are reflected in the modified LCP; b) the proposed LCP in strike-through underline format that is color-coded (or equivalent) to identify provisions that are deleted, modified, stay the same, or are entirely new, where relevant provisions are shown in strikeout if deleted and underlined if added; and 3) a clean copy of the proposed LCP as it would appear if approved as proposed. In either case, the materials that describe the manner in which existing LCP provisions are reflected in the proposed LCP can be based on Section H (Comparisons) that you submitted, or another format that captures the information requested. In all cases, please submit pdf versions of each hard copy submittal, and a word version of the proposed LCP.
3. **Community Plans.** It appears that the County does not intend to submit the various County Community Plans as part of the proposed LCP. It is our understanding that the Community Plans provide significant additional detail that would appear important for guiding coastal development permit (CDP) decisions. Please explain the rationale for submitting only the Bolinas Gridded Mesa and the Dillon Beach Plans and not the others. In addition, please explain how the County intends to utilize the Community Plans that are not proposed to be incorporated into the LCP in relation to proposed development.
4. **Agricultural Worker Housing.** The proposed LCP's standards for agricultural worker housing are unclear, as are the ways in which the LCP currently governs agricultural worker housing and the current extent of agricultural worker housing in the County's coastal zone. Please submit an explanation that identifies: the standards that currently apply to agricultural worker housing; the standards that would apply under the proposed amendment; the number of agricultural worker housing units currently in the coastal zone; the expected number of units under the proposed policies and standards; the maximum number of units that could be allowed under the proposed policies and standards; and the way in which agricultural worker housing density is proposed to be calculated and applied under the proposed LCP. On the latter, the proposed LCP is particularly unclear, including where Section 22.32.028(B) indicates that proposals for agricultural worker housing that exceeds the maximum density for a specific site may need appropriate review from individuals with expertise with agriculture, and then Section 22.32.028(A) says that such housing is not included as part of density calculations.
5. **Agricultural Processing Uses.** The proposed LCP establishes 5,000 square feet as the threshold for determining whether an agricultural processing use is principally permitted or conditional. Please submit clarification on how this figure was derived (e.g., What is the median size of existing processing facilities within the coastal zone and how did the County establish 5,000 square feet as the threshold for whether a processing use is Principally Permitted or not? What is the typical range? Would most such uses be classified as principally permitted?).

6. **Grazing/Agricultural Activities in Wetlands.** Proposed Policy C-BIO-14 continues the existing LCP's allowance for allowing continuing agricultural uses in wetlands if they have been used for such activities prior to April 1, 1981. Please explain how the County determines whether agricultural uses have been in place since that date, and provide copies of any maps or other information the County may have to make such a determination.
7. **Developed Area.** Policy C-BIO-8 reads: "In a developed area where most lots are developed and where there are relatively few vacant lots...". Are there any standards to help define these terms? Are there additional standards that define what constitutes a developed area and an area with relatively few vacant lots? If not, how does the County intend to determine whether a specific site is "in a developed area", and what constitutes "relatively few vacant lots"?
8. **Management of Major Vegetation.** Proposed Policies C-BIO-4 and C-EH-25 both allow for the "management" of major vegetation. As we have discussed, such "management" is not defined in the proposed LCP, and it is unclear whether the County is proposing that a CDP is required for the management of major vegetation, since Policy C-BIO-4 clearly states that a CDP is required only for the removal or harvesting of major vegetation. What types of activities would be interpreted to be "management", and is it the County's intent to have these activities be exempt from CDPs?
9. **Seadrift Heights.** Please explain what the maximum height of development at Seadrift would be under Policy C-EH-11's allowance of building heights to be calculated from the Base Flood Elevation (BFE). What is the BFE at this location and how many undeveloped parcels remain? Also, please provide an analysis to identify what the cumulative impacts such a policy over time will have on visual resources for both new and redevelopment in Seadrift.
10. **Shoreline Access Facilities on Bluffs.** Proposed Policy C-EH-16 allows for shoreline access facilities to be built when they will not cause, expand, or accelerate instability of a bluff. Does the County intend for this policy to affect both public and private accessways? Please explain.
11. **Removed Policies.** The following policies from the existing LCP have been removed, and such removal raises questions:
  - Existing Unit 1 Policy 1 requires a geotechnical report if proposed development is within 150 feet of a blufftop or the site is located in stability zones 2, 3, or 4 as indicated on the Slope Stability of the Bolinas Peninsula Study Area Map in "Geology for Planning, Western Marin County", 1977. This policy has been removed and replaced with a required report only when the parcel is located in "mapped" hazardous areas. Please explain why the 150' requirement was deleted and whether any areas that were previously required to prepare a geotechnical report would now be exempt under the proposed policy.
  - Existing Unit 1 Policy 4 requires development within 300 feet of mean high tide of sea, all lots within Seadrift, parcels with 35% slopes, and parcels within Alquist-Priolo earthquake zones to sign a waiver of liability that the property is located in a hazardous area. This policy has been replaced with Policy C-EH-3, which requires the applicant to record a document exempting the County from liability from environmental hazards and that future shoreline protective devices are not to be allowed. However, the policy only requires this recording for properties "in hazardous areas". Please explain why the more specific language in the existing LCP has not been carried

forward, and what the County intends to consider hazardous areas. Also, would any areas that were previously required to exempt themselves from shoreline protective devices now be exempt under the revised policy?

- Please explain why existing IP Section 22.56.130(L)(2)'s requirement that development of permanent structures are not to be allowed within the 100 year floodplain has been removed, and how the proposed LCP would address these issues. How would proposed development in floodplains be regulated with this policy removed?

**12. Water Resources.** The background section describes the Tomales Bay Watershed Grazing Waiver, adopted by the Regional Water Quality Control Board (RWQCB). Please provide a copy of this document.

**13. Community Specific Policies.** C-PRS-3 supports the recommendations of the Point Reyes Station Community Plan. Please send a copy of this plan. How will the County use the Plan to guide coastal permitting?

**14. Water and Sewer Capacity.** In terms of water and sewer capacity, the proposed LCP removes policies from the existing LCP, including:

- Policy 2.b: North Marin County Water District (NMWD), serving Point Reyes Station, Olema, Inverness Park, and Paradise Ranch Estates, is adequate to serve 755 residential units (354 more than the 401 units then existing), but not adequate to serve the 1,355 units planned for buildout. After 300 residential units have been approved, to ensure that adequate water is available for visitor-serving and other priority coastal uses, the County is to cease issuing residential building permits unless NMWD certifies that capacity is available.
- Policy 2.c: Inverness Public Utilities District, which serves Inverness and Seahaven, is to not permit development until it demonstrates reliable flow levels. When additional water is determined to exist, a reservation system for visitor-serving and other priority coastal uses should be implemented. Any expansion of capacity should have a reservation system for visitor serving uses sufficient to serve the same percentage of the maximum possible expansion of such uses as allowed by the Plan as the portion of total possible residential growth.
- Policy 3.e: After 24 additional units at Oceana Marin, or 125 total, the County is to cease issuing building permits unless North Marin Water District certifies that sewage capacity is available.

What is the implementation status of the above policies? For example, has the County approved its 300<sup>th</sup> residential unit and has North Marin Water District certified that additional capacity is available per Policy 2.b? Please explain how the proposed policies ensure that adequate water and sewer capacities are reserved for Coastal Act priority uses, such as agriculture, visitor-serving uses, and coastal dependent industry, when the County's buildout analysis shows that water and sewer capacities are already burdened and will most likely not be able to accommodate planned growth? In particular, the buildout analysis says: Coast Springs Water Company, Bolinas Public Utility District have moratoria on new water connections, and Stinson Beach County Water District, North Marin Water District-West Marin, Inverness Public Utility District, Estero Mutual Water Company, and private wells serving Marshall are all straining to meet existing capacity and are projected to not be able to serve buildout.

- 15. On-site Sewage Disposal.** Policy C-PFS-10 references the requirements of AB 885 for on-site sewage disposal systems. Please explain these requirements.
- 16. Wells.** Policy C-PFS-14 removes existing Unit 2 Policy 2.a's requirement that individual wells in water service areas are only allowed if they don't affect other existing wells or community sources and that the water system has no plans to extend service. How do the proposed policies ensure that individual wells do not adversely affect other wells and community water sources? Also, what standards would be required of the water system to determine that they are unwilling or unable to provide service, as required by Policy C-PFS-14?
- 17. Septic and RWQCB.** Existing Unit 1 Policy 7 requires all septic systems within the coastal zone to conform with RWQCB standards. However, Policy C-PFS-8 only requires sewage disposal systems *on newly created lots* to conform with applicable County and state regulations, and Policy C-PFS-6 requires new and expanded sewage disposal systems to be designed, constructed, and maintained to protect the biological productivity and quality of coastal streams, wetlands, and waters. What specific standards will the County employ to meet Policy C-PFS-6's requirements?
- 18. Sewer and RWQCB.** Existing Unit 1 Policy 9 and Unit 2 Policy 3.a.2 require that any enlargement or change in intensity of use of an existing structure have adequate sewer with water quality meeting RWQCB standards. This policy has been removed and replaced with Policy C-PFS-7, which says that new and expanded sewage disposal systems are to be sized to meet the requirements of the proposed use/structure. How will the County ensure that changes in use of existing structures have adequately sized and functioning sewage disposal facilities?
- 19. Sir Francis Drake Boulevard.** Existing Unit 2 Policy 4.b requires the protection of Sir Francis Drake Boulevard as a rural, scenic, two-lane roadway. This policy has been removed. What are the County's intended policies for this road, particularly through Inverness and Olema where the road is a primary commercial thoroughfare?
- 20. Commercial Uses.** The existing LCP describes on Pages 12 and 13 and in Policy 14 under Unit 1 that the principally permitted uses in C-VCR zones are commercial and incidental residential. Exclusive residential is a conditional use, and in no case shall it be permitted on more than 25% of vacant lots. There is also introductory language specifying the need to prevent residential uses from overtaking commercial in VCR zones. This language has been removed, and now residential (including single family residential) and commercial uses are classified as a principally permitted use (PPU) in the C-VCR district. Please explain why this language was removed and why the 25% rule is not carried forward into the proposed LCP. Are there any vacant lots remaining zoned C-VCR? How will the proposed amendments ensure that commercial uses over time remain the priority along the Marin coastal zone's primary commercial streets?
- 21. State Parks General Plans.** Are the Mount Tamalpais and Tomales Bay State Park General Plans listed in Policy C-PK-11 proposed to be part of the LCP? Or, are the listed recommendations, including restoring the estuary outlet at Heart's Desire Beach, the only recommendations from the General Plans that will be used to guide CDP decisions? Please explain the intent behind these policies for State Parks, and whether these policies will be regulatory requirements or general recommendations.

**22. CCT.** Policy C-PK-14 and Map 25 describe the California Coastal Trail (CCT). However, Map 25 includes a Countywide map of trails. Please explain which trail segments the County considers to be the CCT.

**23. Fires and Camping.** Proposed Policy C-PA-19 says that signs at public accessways and beaches shall indicate appropriate restrictions, including a prohibition on fires and camping. Is the intent of this policy to preclude fires and camping at all accessways and beaches at all times, or is the intent to allow for a site-specific analysis of where such restrictions may be appropriate?

**24. Public Access.** The following existing LCP policies have been removed, and such removal raises questions:

- Existing Unit 1 Policy 8's listing of Highway 1, Bolinas-Olema Rd, and Mesa Rd for public access signage.
- Existing Unit 1 Policy 9's specific access requirements Stinson Beach, including posting existing pedestrian access easements along Calle Del Arroyo, opening and maintaining at least two additional pedestrian access easements on Calle Del Arroyo at Walla Vista and another in the Calles, and protecting day-use beach access parking on the north side of Calle Del Arroyo.
- Existing Unit 2 Policy 2.b's requirement that accessways should be 10 feet in width and lateral access to exist during high tide.

How does the County intend to ensure that access at these areas, particularly along the Calles, remains clearly open to the public?

**25. Place and Parcel-Specific Policies.** The existing LCP contains numerous policies that are specific to a particular community, park, and/or parcel. While many of the policies are carried forward into the proposed LCP or have already been implemented, some policies have not been addressed in the County's submittal. Please explain whether the following policies have been implemented or why they have not been carried forward into the proposed LCP:

<b>Unit 1 Public Access</b>
Policy 10: Protect public access to Duxbury Reef
<b>Unit 1: Lagoon Protection</b>
Policy 15: Encourage restoration project to eliminate vacant lots on north side of Calle Del Arroyo.
Policy 16: Area north of Calle Del Arroyo shall be designated a resource management area, with permitted uses of fishing, birdwatching, nature study, etc.
Policy 17: Henry Wilkins property (11 acres). Public acquisition encouraged, any change from grazing shall be preceded by environmental investigation to assure habitat values of hightide roost for shorebirds and snipe.
<b>Unit 1: Location and Density of New Development</b>
Policy 30: No development within 100 year floodplain of Easkoot Creek
Policy 31: Rezone east side of Calle Del Arroyo from R-1 to Resource Management Area (same as Lagoon Protection Policy 15)
<b>Unit 2 Public Access</b>
Policy 3: Specific accessway recommendations

<ul style="list-style-type: none"> <li>• Lateral access shall be required for 112-101-09, -10, -11, 112-123-01.</li> <li>• OTD on 104-180-15 and -16. Lateral access shall be provided.</li> <li>• OTD on 106-210-41 (County says need not be accepted).</li> </ul>
<b>Unit 2 Recreation and Visitor-Serving Facilities</b>
<p>Policy 2: State Parks recommendations</p> <ul style="list-style-type: none"> <li>• Inverness Ridge (should be limited to hiking/nature study, County encourages transfer of state lands to PRNS)</li> <li>• Tomasini/Millerton Points: Should be developed for day and overnight use, five single family residences should be removed, bike trail included.</li> <li>• Cypress Grove Project.</li> </ul>
<p>Policy 3b (Olema)</p> <p>(b4): Rezone four parcels 166-202-01 through -04 to VCR</p> <p>(b5) 13 acre parcel 166-193-01, -02, and 166-230-05 shall be rezoned to RCR for hotel/motel</p>
<p>Policy 3c Point Reyes Station</p> <p>County supports overnight accommodations at 119-234-01</p> <p>(1) Village commercial use shall be expanded to A/B/5<sup>th</sup>/6<sup>th</sup> Streets</p>
Policy 3f Tomales: Rezone 1 acre of C-1-H to planned commercial
Policy 4 Bike Paths and 10 ft easements for all projects on either side of Highway 1 and SFD Blvd.
<b>New Development and Land Use</b>
8a(3) Olema: rezone 14 parcels to 20k sq ft lots and/or ARP-5.
<p>8c(4) Paradise Ranch Estates</p> <p>Lot consolidation from 24 to 11 (incorporated in concept)</p>
<p>8g Tomales</p> <p>Rezone 102-080-04, -06</p> <p>102-080-05, -07</p> <p>All land zoned C-R-A:B-1 to C-RSP-7.26</p> <p>102-100-06</p> <p>100-090-17, -18</p>
<p>8h Dillon Beach</p> <p>(4) Rezone Parcels J though M to RMP</p> <p>(5) Rezone RMPC parcels</p>

**26. Coastal Designation.** Section 22.32 describes standards for specific land uses. However, some land uses have two sets of standards, including Agricultural Worker Housing (22.32.023) and Agricultural Worker Housing (Coastal) (22.32.028). Is it the County's intent to have both sets of such standards apply in the coastal zone, or to only have the requirements designated "Coastal" apply (so, for example, Animal Keeping (22.32.030) wouldn't apply)? Please explain.

**27. New Land Uses.** Proposed Land Uses Chapter 22.62 describes the allowable land uses for each zoning district. It appears that many new land uses have been added as allowable. Please explain how the County developed the list of allowable uses. In particular, please explain the following:

- Please explain the difference between "agricultural product sales" (PPU in C-APZ) and "sale of agricultural products" (conditional in C-APZ).

- Please explain why affordable housing is allowed in all zoning districts, including C-APZ, C-OA, and C-RCR.
- Please explain why non-agricultural land uses are allowed in C-APZ, including tennis courts, waste disposal sites, marinas/harbors, and campgrounds.
- Please explain why single family dwellings and other residential uses, as well as industrial uses such as recycling facilities, are identified as a PPU in C-VCR districts.
- Please explain why Table 5-4-b says that residential density is not applicable for C-CP and C-RCR because it is not permitted, even though affordable housing is listed as a PPU for both zoning districts.

**28. CDP Procedures.** Chapter 22.70 describes the County's Coastal Permit Administration procedures. Sections 22.70.030 and 22.70.040 describe CDP category determinations and appeal procedures. Both Section 22.114 of the County's ordinances as well as Section 13569 of the Commission's regulations are referenced for determining the process for appealing a permit category determination. Section 22.114 is not included as part of the County's submittal package. Is it the County's intention to have two parallel but separate appeal procedures, one based on non-coastal County regulations and another based on coastal regulations?

**29. Development Definition.** Please explain the inclusion of the following: "Development" does not mean a "change of organization", as defined in California Code Section 56021 or a "reorganization", as defined in California Code Section 56073. For example, if a public service provider wanted to expand its boundaries and potentially increase development potential, would the County consider the expansion exempt from CDP requirements?

**30. Tidelands.** The proposed definition of tidelands includes uplands to either a point 100 feet inland of the tide line or to the nearest publicly maintained road. Please explain the reason for including this additional upland area in the County's definition of tidelands.

**31. TOC.** The Table of Contents beginning of Page iii of the Development Code does not include all sections that are proposed as part of the LCP. Please submit a revised TOC that clearly identifies all of the applicable code sections that constitute the proposed Implementation Plan.

**32. Height Exceptions.** Under Chapter 22.20.060 (Height Measurement and Height Limit Exceptions), institutional buildings, including schools, churches, and public buildings, may be up to 75 feet tall in all zoning districts if the Director finds no impact to scenic resources. Additionally, the ordinance allows telecommunications facilities, spires, towers, and water tanks to reach up to 150 feet tall, and agricultural structures to exceed height limits with Design Review. Please explain how the County intends to carry out these provisions given that Policy C-DES-4 limits all new construction in the coastal zone to a maximum height of 25 feet.

**33. Setbacks.** Chapter 22.20.090 (Setback Requirements and Exceptions) allows exceptions for the setback requirements spelled out in Chapter 22.64 of the IP, including for detached accessory structures (with Design Review approval), decks, swimming pools, retaining walls, and others. Does the County intend for these exceptions to apply to all setbacks, including ESHA and blufftop/shoreline setbacks?



- 34. Affordable Housing Incentives.** Chapter 22.24 is referenced by Policy C-HS-9 and Section 22.64.130.A.2. The code allows for either a density bonus of 10% in all zoning districts that allow residential uses, or for development of 5 units or greater, a 20% bonus if 10% of units are for low income or 5% for very low income. The proposed IP requires any density bonus to meet all resource protection requirements of the LCP. Since agricultural zoning districts allow housing, would such bonuses be applicable there as well? Have there been any density bonuses granted in the coastal zone? How many units does the County anticipate?
- 35. Tree Protection.** Chapter 22.27 (Native Tree Protection and Preservation) and Chapter 22.62 (Tree Removal Permits) apply to “Protected Trees and Heritage Trees”, which is a list of 36 trees defined in Section 22.130, and is only applicable in non-agricultural areas. Section 22.62.060 also describes a list of exemptions. Please explain how these policies work in concert with the definitions of ESHA and major vegetation. In particular, it must be clear that any allowed exemption from the County’s Tree Removal Permits does not obviate the need for a coastal development permit if the tree is considered major vegetation and/or ESHA.
- 36. Non-agricultural Use Findings.** Some non-agricultural uses in the proposed tables are shown as subject to Section 22.32.115 while others are not (e.g. affordable housing, nature preserve, mineral extraction). Please explain why all uses not listed under “Agriculture, Mariculture” aren’t subject to Section 22.32.115’s required findings that they are accessory and incidental to agricultural production.
- 37. Second Units.** Chapter 22.56 and 22.32.140 (Residential Second Units) allow second units to be separate structures on the property. Please explain why second units are not required to be on the same lot as the owner’s primary residence in Bolinas and Inverness. Please explain how/whether such second units are calculated as residential density. Finally, please explain what is meant by “Applications for Second Unit Permits that are not otherwise subject to a discretionary permit (e.g., Coastal Permit...)”. Wouldn’t all second units be subject to a CDP? Have there been second unit CDPs issued? If so, how many? How many second units does the County anticipate?
- 38. Telecommunications Facilities Policy Plan.** Please explain how heights of telecommunications facilities are regulated, in light of Policy C-DES-3’s requirement that no structures on ridgelines be greater than 18 feet in height, Policy C-DES-4’s requirement that all structures in the coastal zone have a maximum height of 25 feet, and IP Section 22.20.060’s allowance for towers, spires, and other such structures to be up to 150 feet tall. What is the typical height of such facilities in Marin and how many are there in the coastal zone?
- 39. Noticing.** Thank you for submitting a mailing list for all of the people who have participated and commented on the LCP during local hearings. Noting that public interest in the proposed LCP update is high, and extends beyond those who have testified at hearings, please provide stamped, addressed envelopes for all other known interested persons (e.g., parties that commented on CEQA documents, etc.). In addition, please submit an additional 20 stamped, unaddressed, plain envelopes to allow us to notify any additional interested parties of the project hearing date when it approaches. Also, additional noticing will be required for the LCP update if it is agendized for more than one hearing (e.g., if an initial hearing is postponed or continued and noticing is again required for a subsequent hearing). Please provide a commitment to provide additional stamped envelopes in the event that additional noticing is necessary.

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Please note that there may be additional materials necessary for filing purposes depending upon the nature of the information provided pursuant to the above-listed materials.

Again, we would like to thank the County for its commitment to LCP planning, and to the process undertaken locally, including the significant commitment to coordination with Commission staff. As indicated above, we stand ready to continue working together to help perfect the County's LCP amendment package, and to work to narrow potential issues ahead of Coastal Commission hearings on the proposed update. If you have any questions or would like additional detail on these points, please don't hesitate to contact me at (831) 427-4863 or by email at [kevin.kahn@coastal.ca.gov](mailto:kevin.kahn@coastal.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Kahn". The signature is fluid and cursive, with the first name "Kevin" and last name "Kahn" clearly distinguishable.

Kevin Kahn  
Supervising Coastal Planner, LCP Planning  
California Coastal Commission