

April 12, 2016

Members, Marin County Board of Supervisors  
c/o Mr. Jack Liebster  
Planning Manager, Community Development Agency  
3501 Civic Center Drive, Room 308  
San Rafael, CA, 94903

Re: **Marin County Local Coastal Program – Draft**

We write in support of the County staff's proposal to eliminate onerous and needlessly arbitrary language that the Coastal Commission staff has proposed to Marin County's Local Coastal Program. Such language, as currently proposed, would force homeowners to draft plans to remove their homes along the coast, redesign and potentially re-architect their homes to be "removable", and further require homeowners to pay for the demolition or relocation of their own home at any point in the future should a governmental body decide that any portion of it "might" be "subject to hazard". While we understand the Coastal Commission's overall objective – to protect California's coastal zone through planning and regulation of the use of land and water – the proposed language goes too far. It is also unnecessary given already existing regulations. The Commission staff might consider better-informed and less heavy-handed alternatives and, rather than impose costly and draconian measures upon homeowners, seek to ease the burden of the threat that these homeowners may face at some point in the future.

I support the County's decision to replace this language with an expanded statement of risk disclosure that acknowledges existing code sections that already specify when homes become too dangerous to occupy. Such disclosure is already required when building in my neighborhood, and it is the more appropriate mechanism for maintaining homeowner safety in the face of potential hazards.

Requiring homeowners to pay for studies of potential coastal impacts to their homes is onerous. Such studies by their nature will necessarily lend themselves to some level of conjecture and speculation. Forcing a homeowner to pay outside experts for a costly, time-consuming and possibly inconclusive study of whether their home might need to be "removed" 100 years in the future is of dubious value and excessively burdensome. This is particularly so for homeowners who only seek to perform modest home maintenance or modifications, including modifications to make their homes safer in the face of possible hazards such as flooding.

Further, requiring homeowners to design “removable” homes may conflict with federal FEMA standards in my area that require deep-sunk structural support to withstand coastal hazard. The proposed requirements are inconsistent with, and far exceed, requirements imposed on homeowners in other hazardous areas, such as those areas subject to earthquakes.

Finally, the proposed draft language would permit any individual inspector to determine – at *any time* in the future - that a single structural feature of a home may require removal of the entire home. For example, an inspector might determine “that dock of yours might get damaged in a storm” and thus “the law says you have to remove the entire home - and pay for it.” This is an absurd result. But, injudicious and overly broad wording in the proposal would allow such interpretation and arbitrary decision-making. **Our homes – which, for many, represent our life-savings – should not and cannot be exposed to such vagaries.**

For these reasons, we strongly urge you to support your County Staff in their considered drafting of a more appropriate policy that seeks to keep me and my neighbors safe, without exposing California homeowners to unintended, draconian measures in the future.

Sincerely yours,

Lokelani Devone  
Annette Brands  
Residents  
Stinson Beach, California