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MEMORANDUM

**TO: Jack Liebster
Kristin Drumm**

FROM: Peter B. Sandmann

DATE: April 14, 2016

SUBJECT: Comments re LCPA

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Map 27b re Categorical Exclusion area in Stinson Beach. (From original LUP.)
Categorical Exclusion Order E-82-6.

The map does not show the area that is actually covered by the Categorical Exclusion Order, so it should be revised. The Order states that additions of up to 50% of a single-family dwelling are excluded, and the area is the entire coastal zone other than houses on “the inland extent of any beach.” The map should show therefore that only ocean front lots are not excluded, but all the lots in the remainder of Seadrift and in other areas of Stinson Beach set back from the ocean itself are included in the exclusion order. This is an important issue which we hope will be addressed before the LCP is forwarded to the Coastal Commission.

Other, not so significant issues and questions are:

Attachment 4:

C-EH-8(1): who decides whether the minimum floor elevation will be raised by 3 feet, or 2 feet or 1 foot, or some other amount? The section provides for: “additional freeboard up to a maximum of three feet to accommodate identified sea level rise as depicted on “Potential Sea Level Rise Maps” prepared and adopted by the County of Marin, shall be added to the Base Flood Elevation (BFE) when establishing the minimum elevation required for proposed construction.”

Attachment 6:

22.68.060A: are the Seadrift ocean front lots “on a beach” within the meaning of this section?
22.68.060C: what does this mean? For example, if previous landscaping had been exempt, are further improvements required to have a coastal permit? The section refers to: “(or an additional improvement of 10 percent or less where an improvement to the structure had previously been exempt from Coastal Permit requirements),
22.70.160F: what area does “along the shoreline” refer to; is that the same as on the shoreline?

MEMORANDUM

April 14, 2016

Page Two

Attachment 7:

Table 5-4-b, page 50, the cross reference to 22.66.070D, is wrong, should be 22.65.070D, 22.65.070C should be modified to specifically allow construction up to the building set back lines on the subdivision maps; otherwise policies C-BIO-8 and 9 may inappropriately restrict development further back from the shore

22.65.070D cross references C-EH-8 with regard to minimum floor height, but does not cross-reference C-EH-9 allowing for increased roof height to correspond to increased floor height. This could result in limiting the interior height of houses such that ceilings would be very low.