

Commissioners of the California Coastal Commission
c/o Shannon Fiala, Planner
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Commissioners,

Please vote to approve all submitted Amendments to the Marin County LCP with your staff's recommend changes, except for Amendment EH and its corresponding IP sections in 22.64.060.

As a homeowner in Stinson Beach, an active member of a local homeowner's board and adjunct on sea level rise issues to the Stinson Beach Village Association, and finally as the Stinson area community representative to Marin's C-SMART program, I have spent the past three years intimately involved with the issue of sea level rise and the associated hazards it represents to my community, and to the entire coast. I have personally attended well over a dozen meetings with Marin County staff, and in many cases with your staff, including those of a technical nature and ones more focused on public outreach. I personally helped Marin County staff and the SBVA organize three large community meetings; these attracted the largest turnouts seen in recent memory at the local Community Center, with one exceeding 120 concerned residents. I have helped organize surveys of local residents, distributed fliers about sea level rise issues, attended meetings of architects and design engineers focused on flood safety solutions, and even appeared twice on the West Marin radio station, KWMR, to ask residents to inform themselves about sea level rise hazards and to get involved with the County in helping to craft our response to these threats in its Environmental Hazards amendment. I have read every line of the Coastal Act and every submission, staff report and proposed set of edits to our LCP, and helped many others to do the same. I can safely say, we in Stinson Beach have done about all that is humanly possible these past several years to get informed and involved in this very important amendment to the Marin County Local Coastal Program.

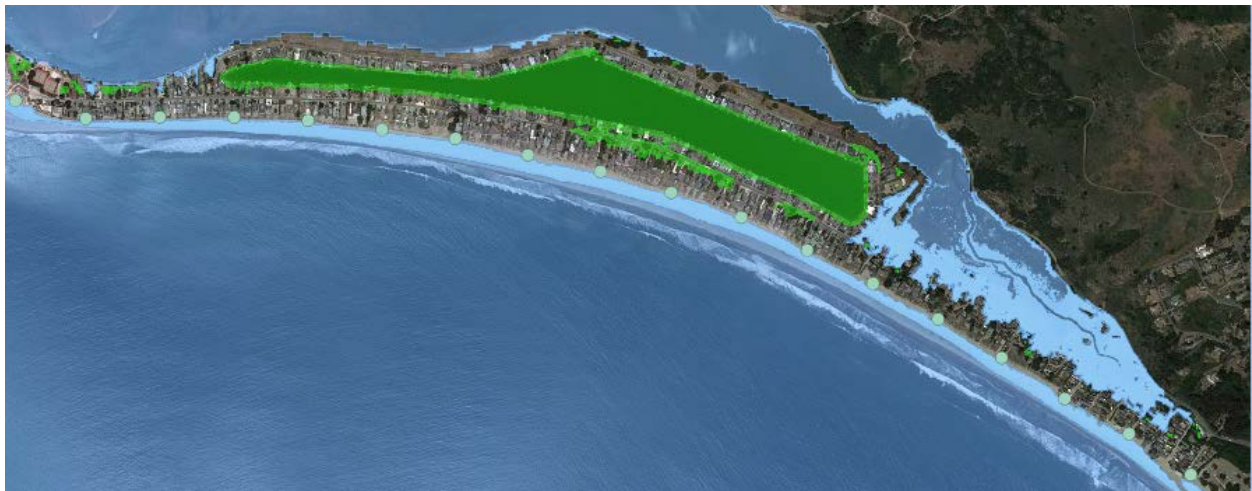
That is why I feel I can personally relate to you the stunned disappointment of local residents with the proposed changes to the Environmental Hazards Amendment your staff has once again put forward. The general reaction can be summed up as an incredulous: "but how can they do that – we worked so hard on this?" And we have. We helped the representatives of Marin County create a carefully thought out, delicately balanced set of hazards regulations that work for our area and meet the goals of the Coastal Act. This was no easy task, and to be frank, many if not most homeowners would argue that Marin County's proposed EH regulations are still more onerous and impose a greater burden on homeowners than we feel is truly fair in light of Coastal Act requirements. But in the end, every single community organization in the area agreed that we could live with the Amendment as approved by our Board of Supervisors, and we understood where County staff needed to carefully balance considerations beyond our personal health and safety, and our rights as homeowners, to make certain that they accommodated critical Coastal Act goals of ensuring public views, public access, erosion protection, environmental quality, and visitor-serving uses. To paraphrase a very wise man, we couldn't always get what we wanted, but we got what we needed.

It would be easier to explain to disheartened neighbors why your staff simply erased years of our hard work with Marin County staff had they replaced it with thoughtful changes that took the County's submitted proposal as the basis for discussion and then carefully justified a few necessary modifications in terms of Act requirements, as they have for instance done in the AG amendment. Instead – and I think this is why so many I have talked to have lost all respect for this "process" – they clearly rehashed and pasted back in the same language and the same proposed regulations that had twice been rejected in the past two years by the Board of Supervisors for Marin County. Making this even more mystifying, I was at the last hearing in 2015 when clear marching orders to both staffs were to find a compromise, and to do so with substantial public input as mandated by the Coastal Act. It is not a "compromise" when one party gathers all the public input and then moves more than halfway to a solution, and then the other party simply moves the goalposts that much further away. After three years of this, a third submission where your staff simply refuses to do anything other than put forward their own preferred solutions and brooks no compromise, it is finally time to admit that no compromise will ever be found.

Marin County should not compromise on the Environmental Hazards amendment. They created an amendment that works in Stinson Beach and elsewhere along the coast, and your staff did not. I could go into many, many places in your staff's proposals to explain why, and indeed I am sure many of my neighbors will, but as the C-SMART representative let me clarify one particularly graphic example: if the Shoreline Development and 100 year maximum possible sea level rise standards your staff has repeatedly insisted on reinserting ever become law in Marin, no permits could ever again be issued in most of Stinson Beach. I have counted well over 300 homes just in our neighborhoods alone that would eventually become unmaintainable due to denied permitting. Here is a map that illustrates your staff's proposal for my village: by combining a requirement to floodsafe for a 1%-chance-occurrence 100 year storm at the maximum possible sea level projected by best available science 100 years from now, everything in Stinson Beach west of Highway One loses its permitting rights. The likelihood of this occurring, based on the equal-proability-distribution likeliness at 1" increments of the maximum possible sea level rise actually reaching 6'6", according to C-SMART's tools, is slightly more than one one hundredth of one percent - your staff would like us to give up our property rights and our ability to safeguard our homes based on a 0.00016 probability that our town will be inundated.

Instead, the following is a map of Marin County staff's proposal. It shows FEMA heights + 3 feet. The odds of this occurring 100 years from now with a hundred year storm are a little less than one in a hundred. That still seems an excessive level of protection to impose on us for the next 100 years, but as you can see, meeting these odds gives a reasonable chance my town can "survive", since only a few of the lowest lying homes, which could be safeguarded under Marin's EH, would have permitting issues.

And under Marin County's proposal, we would revisit this map every 10 years, adjusting it as science progresses and our understanding of what really will happen 100 years from now improves. In one proposal, we lose our property rights for an insanely longshot gamble by your staff. On the other, we sanely balance those rights with legitimate science, correctly evaluated probabilities, and a process that keeps us safe.



This is just one of many examples of how ill-conceived the proposed changes to Environmental Hazards really are. Please, respect the time, energy, and careful consideration we have put into crafting a workable amendment with Marin County, and vote to accept Marin County's submitted Environmental Hazards amendment on Wednesday the 2nd.

Thank you,

Jeff Loomans
C-SMART Community Representative for Stinson Beach
167 Dipsea Rd, Stinson Beach, CA
loomans@stanfordalumni.org