May 12, 2016

Re: Public Hearing - Marin County Local Coastal Program Amendment

Dear Board of Supervisors,

These comments are submitted on behalf of Turtle Island Restoration Network. We request that the Board approve the non-environmental hazards amendments including both the Land Use Plan and the Implementation Plan with suggested modifications from the Coastal Commission. It is in the best interest of the public, and the best use of the substantial taxpayer funds that the County has already expended, that the Board accepts these amendments so that the LCP Update process can continue to move forward.

If the County has any remaining issues with the conditionally-certified amendments, the appropriate time to raise these issues will be in a subsequent amendment process. The Coastal Commission has already indicated a willingness to work with the County on subsequent amendments when the environmental hazards portion of the LCP is brought back before the Commission.

Turtle Island recommends that all of the non-environmental hazards amendments, including the Land Use Plan (amendments 1 and 2) and the Implementation Plan (amendments 3, 6, and 7) be brought before the Board for its approval. The County staff’s proposed piecemeal approach of considering first the Land Use Plan and then the Implementation Plan separately serves no purpose other than to further delay the completion of the critical environmental hazards sections. To help accomplish timely consideration of all non-environmental hazards amendments, Turtle Island strongly urges the Board to direct County staff to prepare a new resolution to approve all of the amendments with the Coastal Commission suggested modifications excluding environmental hazards and brings the resolution forward for the Board’s consideration at the soonest possible date.
The County’s environmental hazards amendments will expire after September 29, 2017, which means the Coastal Commission must act at the latest at the Commission’s September 13-15 meeting. Although those environmental hazards amendments were previously brought before the Board in April 2016, significant changes must be made to make them Coastal Act compliant and additional approval by the Board will be required. Due to this fast approaching deadline, it is critical that the Board act May 16 on the non-environmental hazards amendments.

In conclusion, it is Turtle Island’s strong recommendation that the Board should approve the non-environmental hazards amendments including both the Land Use Plan and the Implementation Plan with suggested modifications. The approval will allow the County to keep this process moving forward so that the County and the Commission can turn to the important issue of environmental hazards.

Thank you for your consideration of our comments.

Respectfully submitted,

Cassie Burdyshaw  
Advocacy & Policy Director  
Turtle Island Restoration Network