



April 9, 2018

999 Rush Creek Place  
P.O. Box 146  
Novato, CA 94948-0146

Marin County Board of Supervisors  
3501 Civic Center Drive, Suite 329  
San Rafael, CA 94903

**PHONE**  
415.897.4133

**EMAIL**  
info@nmwd.com

**WEB**  
www.nmwd.com

Via Electronic Mail: [BOS@marincounty.org](mailto:BOS@marincounty.org) / [marinLCP@marincounty.org](mailto:marinLCP@marincounty.org)

RE: Marin County Local Coastal Program Amendment

Dear Supervisors:

The Marin County coastal municipal water systems have unique challenges before them to ensure our communities have safe drinking water and adequate fire protection. The Coastal Permit process needs to recognize this and provide consideration to streamline the permitting process. Our water systems have aged infrastructure needing replacement, may have limited fire water storage that needs to be upgraded, and aged redwood tanks that are fire and earthquake damage prone needing replacement.

These critical lifeline infrastructure projects (and others) should have a streamlined permitting process that spends public monies effectively. Per the California Code Title 22, Division 4, under the California Environmental Quality Act, many water system projects are Categorically Exempt Class 2 or 3. It would be helpful if the Coastal Permit process mirrored the Exemptions allowed for in the CEQA process.

One particular area of concern is the replacement of redwood tanks. The 1995 Mt. Vision fire caused the redwood potable water tank (North Marin Water District service area) at the top of Drakes View Drive to be destroyed by fire. The Inverness Public Utility District has a Capital Improvement Program (CIP) to replace all six of the remaining redwood tanks with steel tanks. Similarly, the North Marin Water District has an ongoing CIP program to replace all remaining redwood tanks. There are limited tax payer monies available to provide for replacement of key infrastructure crucial to our coastal water systems. The LCP permitting process should be amended to reflect the replacement of this important infrastructure in the coastal permitting process to reduce overall project cost and schedule.

The undersigned water districts respectfully request that the Local Coastal Program amendment provide the County planners with a means to streamline the Coastal Permit process, particularly for critical lifeline infrastructure such as water systems. This would include the ability to grant a de minimis waiver if there are no adverse impacts. An exemption should allow for an increase in storage of up to 10% or that required for Marin County fire protection goals. In a high fire area, this storage is important. Fees for this permit application (if the de minimis waiver is granted) would be waived.

The current LCP updates do not address municipal public water system concerns with already overly complex and burdensome permitting requirements.

Thank you for your consideration.

Signed:

A handwritten signature in blue ink, appearing to be "John Schoonover", is written over a blue circular stamp.

General Manager  
North Marin Water District

Muir Beach Community Services District  
Inverness Public Utility District

\\nmwdsrver1\administration\gm\local coastal program\lcr county lcp 04.09.18.doc  
DIRECTORS: JACK BAKER • RICK FRAITES • MICHAEL JOLY • STEPHEN PETERLE • JOHN SCHOONOVER

OFFICERS: DREW MCINTYRE, General Manager • KATIE YOUNG, District Secretary • DAVID L. BENTLEY, Auditor-Controller • ROCKY VOGLER, Chief Engineer