

# BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT

BCPUD      BOX 390 270 ELM ROAD BOLINAS CALIFORNIA 94924      415 868 1224



January 20, 2012

Marin County Planning Commission  
Marin County Civic Center  
3501 Civic Center Drive  
Room 308  
San Rafael, California 94903  
via e-mail: [dstratton@co.marin.ca.us](mailto:dstratton@co.marin.ca.us)

Marin County Board of Supervisors  
Marin County Civic Center  
3501 Civic Center Drive  
Room 329  
San Rafael, California 94903  
via e-mail: [bos@co.marin.ca.us](mailto:bos@co.marin.ca.us)

Re: Local Coastal Plan Update – Shoreline Protective Devices

Dear Commissioners and Supervisors:

On behalf of the Board of Directors of the Bolinas Community Public Utility District (“BCPUD”), I am writing this letter to convey the Board’s comments concerning criterion number 8 for the proposed LCP Land Use Policy Amendment C-EH-13 – Shoreline Protective Devices. Criterion number 8, as proposed, reads as follows:

“The shoreline protective device is authorized for a period of twenty years from the date of approval. Maintenance beyond the twenty-year period, modification, or expansion of the approved device shall require approval of an amendment to the Coastal Permit.”

Our district is concerned about this proposed language insofar as it appears to allow the County to authorize shoreline protective devices for a twenty-year period only, which is far less than the engineered lifespan of the type of shoreline protective device we understand to be preferred by the Coastal Commission (assuming all other permitting criteria can be met), which is a soil-nail sculpted concrete wall. These walls are very costly to design, permit and construct; applicants seeking to build such devices necessarily need to know that their permit will be in effect for so long as the shoreline protective device, and the structure(s) it is designed to protect, are in place. If not, it could be impossible for local jurisdictions to raise the funds needed for such devices, which often is the only solution available to preserve public roads, utilities and access to the coast.

While a twenty-year permit may be appropriate for other types of shoreline protective structures, such as revetments, which are not permanent structures and which require frequent maintenance and rebuilding, we do not believe a “one size fits all” approach to the length of a permit for shoreline protective devices is the best policy. ***We urge you not to approve criterion 8; rather, any limitation on the length of a permit for a shoreline protective device should be decided on a case-by-case basis, depending on the specific design of the device and the details of the structure(s) it is designed to protect.***

Thank you very much for this opportunity to comment on the proposed LCP Land Use Policy Amendment C-EH-13 – Shoreline Protective Devices. Please call me at the number listed above or send me an e-mail at [jblackman@bcpud.org](mailto:jblackman@bcpud.org) if you have any questions or would like to discuss any aspect of this letter.

Very truly yours,

Jennifer Blackman  
General Manager