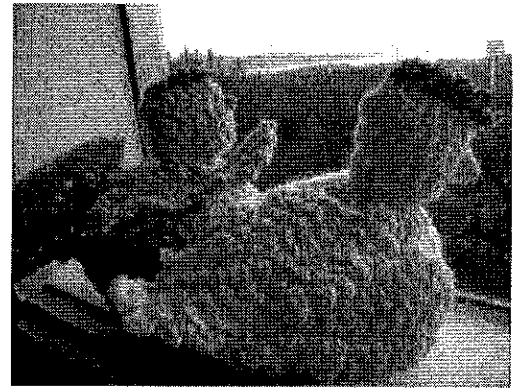


Scott Miller
 P.O. Box 145
 Dillon Beach, CA. 94929
 (707) 878-2167

October 3, 2014

California Coastal Commission
 45 Fremont St., suite 2000
 San Francisco, Ca. 94105-2219



Re: Marin County LCPA #LCP-2-MAR-13-0224-1 Part A

Dear Staff and Commissioners,

Part A should be due before Part B.

If approved, the new deadline for the LCP Part A (LUP) will be November 15, 2015.
 The deadline for the LCP Part B (IP) is July 27, 2015.
 The first step to completing the IP is certifying the LUP.
 Part B will need to be finished 3 1/2 months *before* Part A.
 Which is the chicken and which is the egg?

Doing Part A and Part B at the same time proved to be too complicated, and the IP was delayed (deadline extended) so the LUP could be finished first.
 Now the IP will need to be finished first.
 A,B,C, it's as easy as 3, 2,1.

If the IP deadline is missed, it is automatically *approved*.
 If the LUP deadline is missed, it is automatically *denied*.
 If both deadlines are missed, there will be a certified Part B and no Part A.

The Commission may extend, for good cause, time limits related to LCPs *up to* one year.
 There was good cause to extend the Part B (IP) deadline for one year.
 There is *not* good cause for extending the time limit for Part A beyond the time limit for Part B.

In summary,

Part A should be due before Part B.

Sincerely,

Scott Miller

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
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Prepared September 19, 2014 (for October 10, 2014 Hearing)

F12a

To: Coastal Commissioners and Interested Persons

From: Dan Carl, District Director
Nancy Cave, District Manager
Kevin Kahn, District Supervisor, LCP Planning

Subject: Request to Extend the Time Limit to Acknowledge and Accept the Modifications Suggested by the Coastal Commission on Marin County Local Coastal Program Amendment Number LCP-2-MAR-13-0224-1 Part A (Marin LUP Update)

At the May 15, 2014 Coastal Commission meeting in Inverness, the Commission denied, and then approved if modified by the Commission's suggested modifications, Marin County Local Coastal Program (LCP) Amendment Number LCP-2-MAR-13-0224-1 Part A (Marin LUP Update). This Land Use Plan (LUP) amendment is part of a package of amendments intended to comprehensively update the County's LCP overall. The Implementation Plan portion of the amendments is currently pending, with a hearing expected to be scheduled within the year.

Pursuant to the Commission's regulations, the County has six months from the date of Commission action to accept the Commission's suggested modifications, in this case by November 15, 2014 (California Code of Regulations (CCR) Section 13537). If the County has not accepted the suggested modifications by that time, then the Commission's approval with suggested modifications expires at that time, and only the Commission's denial stands.

Coastal Act Section 30517 and CCR Section 13535(c) provide that the Commission may extend, for good cause, time limits related to LCPs for a period not to exceed one year. The County requested a one year extension of time to accept the modifications suggested by the Commission on the LUP. A one year extension would result in a new deadline of November 15, 2015 for the County to accept the Commission's suggested modifications on the proposed amendment. Although staff believes that this matter will be resolved well before the new deadline, it is appropriate in this case to extend the deadline for a year as allowed by the Coastal Act and the Commission's regulations to provide maximum time flexibility for getting the LCP update certified overall, including in relation to the upcoming IP component. Therefore, staff recommends a one year extension of time.

Summary of the Staff Recommendation

Staff recommends that the Commission extend the expiration date of its approval with suggested modifications, and thus extend the six-month time limit that applies to the County's acceptance of the Commission's suggested modifications, for a period of one year. Staff recommends a **YES** vote on the motion below. Passage of the motion will result in a new deadline for County action on this proposed LCP amendment. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Motion. I move that the Commission extend the six-month time limit for Marin County to accept the Commission's suggested modifications that apply to LCP Amendment LCP-2-MAR-13-0224-1 Part A by a period of one year, to November 15, 2015.