



PACIFIC LEGAL FOUNDATION

May 12, 2014

Mr. Kevin Kahn
District Supervisor, LCP Planning
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

VIA EMAIL: kevin.kahn@coastal.ca.gov

Re: Agenda Item No. Th 12a–May 15, 2014 Meeting
Marin County LCP Amendment No. LCP-2-MAR-13-0224-1 Part A
Marin LUP Update

Honorable Commissioners,

Pacific Legal Foundation attorneys submit for the record the attached letters addressing specific concerns with provisions of Marin County's Local Coastal Plan Amendment. While the policy numbers referenced in these letters may have changed in the document currently before the Commission, the issues have not. And the arguments remain relevant. As the letters explain, the Foundation's attorneys are very concerned that the LCPA, as drafted and with the Commission's staff's suggested modifications, does not adequately protect Marin County property owners' right to the beneficial use and enjoyment of their property. Clarifying the LCPA, as the letters suggest, will ensure that the document incorporates state and federal constitutional property rights' protections, which may help to insulate the Commission, and the County, from future legal challenges.

Thank you for your careful consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Beard".

PAUL J. BEARD
JONATHAN WOOD
JENNIFER F. THOMPSON
Attorneys for Pacific Legal Foundation

Enclosures