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August 21, 2026

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Dr. Neil Jacobs

Under Secretary of Commerce for Oceans and Atmosphere

National Oceanic and Atmospheric Administration

1401 Constitution Avenue NW, Room 5128

Washington, DC 20230

RE: Comments on NOAA Evaluation of the California Coastal Management Program (Docket No. 260623-0150) pursuant to Federal Register Number 2026-12907

Dear Undersecretary Jacobs:

On behalf of the Marin County Board of Supervisors, I respectfully submit the following comments regarding the National Oceanic and Atmospheric Administration's (NOAA) evaluation of the California Coastal Management Program (CMP) under the Coastal Zone Management Act (CZMA). We appreciate the opportunity to participate in this public process and reaffirm our strong support for California's federally approved CMP and the longstanding federal-state partnership established by the CZMA.

Marin County is concerned that this off-cycle evaluation, with its unusually narrow focus on a limited set of federally prioritized issues — including offshore oil production, pipeline maintenance, desalination projects, undersea cables, and spaceport infrastructure — could be used to undermine California's longstanding coastal protections or diminish the role of state and local governments in coastal decision-making.

NOAA recently conducted a comprehensive evaluation of California's Coastal Management Program, including public meetings and extensive stakeholder engagement in 2024. In June 2025, NOAA completed a draft evaluation concluding that California had successfully implemented and enforced its federally approved Coastal Management Program. Marin County is concerned that reopening an evaluation so soon after a successful review undermines the predictability and cooperative federal-state partnership that has been the foundation of the CZMA for more than fifty years.

The Coastal Zone Management Act was intentionally designed as a cooperative framework that balances national interests with state expertise and local stewardship. California's Coastal Management Program has served as a national model for decades by protecting coastal resources while supporting sustainable economic development, public access, commercial fisheries, recreation, and coastal resilience. We urge NOAA to preserve this partnership and avoid actions that could erode state and local authority under the CZMA.

Marin County is particularly concerned that this evaluation could be used to facilitate new offshore oil and gas leasing or otherwise weaken California's ability to review federal activities affecting its coastline through the CZMA's federal consistency provisions. Any future federal action affecting California's coast must continue to respect the consistency requirements of the CZMA, including formal review by the California Coastal Commission.

Marin County has long opposed any new or expanded offshore oil and gas development because of the unacceptable risks it poses to our communities, environment, and economy. The Marin County Board of Supervisors has consistently opposed new offshore drilling and has repeatedly urged federal agencies to exclude California's coast from offshore leasing programs.

The waters offshore of Marin are among the most ecologically rich and sensitive ocean areas in the nation. The Cordell Bank and Greater Farallones National Marine Sanctuaries support globally important marine ecosystems and have layered protections reflecting decades of bipartisan federal and state efforts to globally important marine ecosystems.

These protected waters also sustain a thriving coastal economy built on tourism, recreation, commercial fishing, and outdoor businesses that depend upon healthy oceans and clean beaches. The state's coastal economy generates approximately \$51 billion annually, supporting businesses and jobs that depend on healthy coastal ecosystems. Weakening California's coastal management framework would place these economic benefits at unnecessary risk while providing little corresponding public benefit.

Marin County believes that decisions affecting California's coast must be grounded in sound science, existing law and protections, and meaningful engagement with the communities that will bear the environmental and economic consequences of those decisions. The Coastal Zone Management Act has succeeded for more than fifty years because it recognizes that coastal states are best positioned to balance resource protection with responsible coastal development.

Accordingly, we respectfully urge NOAA to:

- Preserve the cooperative federal-state partnership established by the Coastal Zone Management Act;
- Respect California's authority to implement its federally approved Coastal Management Program, including the CZMA's federal consistency requirements;
- Ensure that this evaluation is not used as a vehicle to weaken California's coastal protections or facilitate expanded offshore oil and gas development; and
- Continue to recognize the vital role that state and local governments play in protecting nationally significant coastal resources while supporting sustainable coastal economies.

Thank you for the opportunity to provide these comments. We appreciate NOAA's consideration and look forward to the continued partnership between the federal government and California in protecting our coastline.

Sincerely,



Eric Lucan, President
Marin County Board of Supervisors

CC: Marin County Board of Supervisors
Senator Adam Schiff
Senator Alex Padilla
Congressman Jared Huffman