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March 14, 2022

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

*Submitted via email: housingelement@marincounty.org,  
bos@marincounty.org, drodoni@marincounty.org*

**RE: Unincorporated Marin County Housing Element 2023-2031**

Dear Marin County Supervisors,

Since 1971, the Environmental Action Committee of West Marin (EAC) has worked to protect the unique lands, waters, and biodiversity of unincorporated coastal West Marin County. Since our inception, we have advocated to protect the irreplaceable natural resources and environment, while balancing the needs of our coastal communities and villages.

Over the last fifty years, we have worked to support A-60 zoning to protect Marin’s agricultural lands; supported collaborative efforts to address water quality issues, preventing sewage from being discharged into our watersheds; worked collaboratively within our coastal communities and with the County to identify sustainable pathways for development and growth; participated extensively in the Local Coastal Program Amendment update; and supported countywide efforts to adapt, mitigate, and build community resilience to the effects of the climate crisis.

Since 1973, the Marin Countywide Plan has called for the protection and development of communities characterized by accessibility, mixed use, and amenities for shopping, services, and public spaces. The prevailing character of

new development in Marin County continues to be focused on single use, urban sprawl, and vehicle dependence. Future growth in Marin should be planned in accordance with standards for protection of the environment and the availability of services and resources.<sup>1</sup>

EAC understands that we have a severe housing crisis in Marin County for low- and moderate-income residents, and we are supportive of affordable housing projects that are sited in appropriate areas for development (focused on infill, near transportation corridors and community services, and that do not degrade freshwater systems or sensitive habitat areas).

This community discussion on housing does not need to be framed as environmentalists verse housing advocates. Rather, our communities are all experiencing the same challenges, and through effective public engagement and meetings, we could find ways to appropriately site and develop much needed residential housing together.

Today, EAC submits our comments in response to the housing alternatives that were released to the public on March 1, 2022, and the hybrid list of sites published on March 8, 2022. Our comments are focused on West Marin, an area we define by the coastal watersheds that discharge to the Pacific Ocean, Tomales Bay, and Bolinas Lagoon including the villages of Tomales, Dillion Beach, Inverness, Marshall, Point Reyes Station, Nicasio, Olema, San Geronimo Valley, Bolinas, Stinson Beach, and Muir Beach. These comments follow up on our prior comments.

### **A-60 Zoning**

- The County of Marin should remove from consideration all locations currently zoned as A-60. A-60 Zoning was established to protect Marin’s agricultural lands from suburban development and urban sprawl in the 1970s, and the County defended this zoning in litigation all the way to the Supreme Court.
- A-60 zoning should be left in place as any rezoning is a slippery slope that allows for chipping away agricultural parcels one at a time. In eight years, the County of Marin will receive another Regional Housing Needs Allocation (RHNA), and decisions made today to undermine the intentions of A-60 zoning to allow for subdivision and development will only justify additional rezoning of other A-60 parcels in the future and result in sprawl beyond the urban growth boundaries.
- We request the A-60 sites listed on the hybrid map: Buck Center (104 units), Lucas Valley (26 units), and Bowman Canyon (152 units) are removed from consideration. All these units are for moderate and above-moderate housing suburban sprawl (a slap in the face to the hard work and efforts of our communities and the County of Marin the last 50-years to protect our agricultural lands and open space).

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<sup>1</sup> Community Marin, A Vision for Marin County, Policy Recommendations. 2013.

### **Remove Parcels within 100 feet of riparian corridors, wetlands, or shorelines**

- Parcels within mapped floodplains, within 100 feet of riparian corridors, wetlands, or shorelines should be removed from consideration to protect critical and sensitive environmental habitat areas.
- The rural villages of West Marin are without any centralized wastewater treatment systems and any new development that would be susceptible to flooding should not be developed. Our communities will only set the stage for increasing bacterial loads in our freshwaters systems and beaches.
- Planning must be smart and proactive, benefiting the entire ecosystem (including our villages) protecting our clean water and important habitat areas that sequester greenhouse gases, act as fire breaks, and provide essential habitat to species.

### **Housing Crisis Concerns, We Can't Just Build our Way out of This!**

- Creating thousands of units of new development is not guaranteed to solve the housing crisis. It is important this housing discussion is thoughtful and considerate of the unintended outcomes that could arise by just adding more housing stock in West Marin and other parts of unincorporated Marin.
- Housing that could be developed from this RHNA cycle needs to be protected as residential housing. There is a severe shortage of housing in West Marin, primarily due to second homes (vacation homes that drive up the cost of housing<sup>2</sup>), and housing being converted to income properties through short-term rentals and corporate timesharing corporations.
- As the County plans for increased development to meet the need for this RHNA cycle, the County must also focus on limiting some of the issues that continue to reduce our current housing stock, specifically related to short-term rentals.

### **Avoid Environmental Hazards and Focus on In-Fill**

- It is essential to this planning process to use our current plans for environmental hazards to remove locations susceptible to environmental hazards including wildfire, flooding, and sea level rise.
- Locations proposed in high wildfire risk areas should be reconsidered and the County should focus on in-fill near community services and transportation corridors. In-fill will provide access to public transportation and services and align with the Sustainable Communities Strategy Growth Geographies as Priority Development Areas.<sup>3</sup> Adding thousands of housing units to rural

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<sup>2</sup> Sale of 398 Ocean Pkwy, Bolinas, CA 94924. 640 square feet that sold for \$1.75 million dollars, or \$2,734 per square foot which will now have a primary use as a vacation home and is removed from available housing stock.

<sup>3</sup> The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments, Plan 2050, Chapter 1. Growth Geographies. Available at: <https://www.planbayarea.org/2050-plan/final-plan-bay-area-2050/chapter-1-introduction-and-growth-geographies>

areas will increase the number of Vehicle Miles Traveled (VMT), undermining Marin and California's greenhouse gas emission reduction goals.

- Sites that are located in critical watersheds for endangered and threatened species should also be removed from consideration.
- Locations that are within public utility districts that provide drinking water to residents should also be removed due to concerns with pollution and wastewater contamination.

#### **Additional Locations to Consider**

- The Marin County Fire Station located in Woodacre should be added to the site list for consideration of housing rather than the Club House parcel on the former San Geronimo Golf Course. The San Geronimo Golf Course property is currently owned by the Trust for Public Land and has a low probability of being sold for housing development.

#### **Process and Alternative Site Selection Questions:**

- On March 1, 2022, the County released two alternatives for consideration. Then later, on March 8, 2022 a hybrid site list was released for public review. Some parcels listed on alternative 1 and 2 are not included on the hybrid site list. We are unclear which list of sites are actually under consideration for development. Please clarify.
- What is the process for community members to suggest alternative locations for development, and what is the deadline for any new considerations?

Thank you for the consideration of our comments. We will continue to share information about the progress of this planning effort and hope there will be an opportunity for an in-person meeting in the near future for the community to fully participate in this critical planning process. We look forward to continued participation in this complex process.

Sincerely,



Morgan Patton  
Executive Director



Bridger Mitchell  
Board President