



November 21, 2022

County of Marin
Attention: Rachel Reid
Environmental Planning Manager
3501 Civic Center Drive, Suite 308
San Rafael CA 94903

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Submitted via email to Rachel Reid at envplanning@marincounty.org, Supervisor Dennis Rodoni at DRodoni@marincounty.org, and the Marin County Board of Supervisors at bos@marincounty.org

RE: Housing and Safety Element Update Draft Environmental Impact Report

Dear Ms. Reid,

The Environmental Action Committee of West Marin (EAC) is based in Point Reyes Station and has been working to protect the unique lands, waters, and biodiversity of West Marin since 1971. We appreciate the opportunity to comment on the Housing and Safety Element Update Draft Environmental Impact Report (DEIR).

We have been engaged in the Housing and Safety Element Update public process since January 2022, submitted multiple written comments, and attended all 2022 Planning Commission and Board of Supervisors Workshops on this topic. While we reviewed the DEIR with a focus on West Marin, we also reviewed it for some county-wide impacts.

Since EAC's founding, we have been committed to the health of West Marin's lands, estuaries, bays, watersheds, and coastal communities and throughout this process have remained focused on key areas as this project has moved forward:

1. Protecting Sensitive Habitats

The impacts on critical habitat areas, listed and special status species, water quality, and wastewater development within 100 feet of sensitive habitat areas would be significant and potentially unavoidable.

2. Supporting Smart Growth Aligned with Plan Bay Area 2050 and Marin's Countywide Plan

Supporting high-density infill, redevelopment, and rezoning of commercial areas near job centers and transit corridors, maintaining A-60 zoning to protect the inland and coastal corridors from urban sprawl development and reducing greenhouse gas (GHG) emissions to meet local, regional, and state reduction goals.

3. Upholding the Integrity of Community Planning

Honoring local community plans and updating sections that are out of alignment with the Countywide Plan.

4. Supporting the Integrity of Adaptive Planning

Supporting projects that allow Marin County to meet the Climate Action Plan 2030 reduction targets and avoid and plan for environmental hazards related to climate change including drought, wildfire, rising sea levels, and groundwater intrusion as site locations are identified and selected.

5. Supporting Residential Housing

Supporting policies that ensure that future development of residential housing will support the residential community. Second homes and short-term rentals severely deplete Coastal Marin County's primary residential housing stock. This includes our support for a short-term rental ban, vacancy tax, and supporting community land trusts to ensure dedicated long-term affordable housing and solutions to these complex problems.

6. Supporting Proactive and Long-Term Planning for the 2030 Housing Element Update

The County is making dramatic and precedent-setting changes to the Countywide Plan to meet the Regional Housing Needs Allocation. Changing the primary planning corridors and rezoning A-60 parcels are significant. We are concerned that the County may be placing too many sites in this update that will become by-right development projects in 8 years and undermine the last 50 years of proactive community planning.

While we understand the complex challenge the County is facing to meet the significant Regional Housing Needs Allocation in a timely manner, we do raise several significant concerns. Our concerns are followed by additional questions and specific concerns organized by the chapter.

As a general comment, we are concerned that the structure of the DEIR is very challenging for the public to follow and understand. We explore this in detail below, as well as provide some suggestions where possible.

In the conclusion of our letter, we recommend the County create a **new** alternative that would incorporate aspects of Alternative 2 to reduce VMT and Alternative 3 to reduce impacts on water resources and wastewater that is balanced by overlaying specific project feasibility. However, we have significant concerns with the DEIR that should be considered and resolved prior to issuing the Final Environmental Impact Report.

Summary of our Concerns

- The DEIR is an inadequate and defective analysis. Information, analysis, and mitigations are missing or incomplete in several areas. Details are noted below in our comments by chapter.
- The DEIR fails to provide a framework for decision-making on site selection or clear alternatives.
- The DEIR does not include enough information to identify protect and mitigate impacts from future by-right development projects.
- The DEIR fails to provide a way to identify a specific site and understand how a parcel may be used in the future due to the split programmatic analysis of the Proposed Project Sites and Candidate Housing Sites that fail to identify potential impacts to the Project Planning Area and foreseeable impacts with neighboring communities.

General Questions and Concerns

1. *It is unclear which policies will be applicable to by-right development projects for the final list of sites. Will all the listed mitigations within the DEIR be applicable to by-right development?*
2. *Are all the Candidate Housing Sites (more than 10,993 locations) included and applicable in this DEIR? If so, are all the Candidate Housing Sites eligible for by-right development in 8 years?*
3. *The DEIR refers to “inventory sites.” Does that refer to the third list of sites that are also included?*
4. *The policies of the Countywide Plan, local ordinances, and other land-use plans are presented as binding mitigation measures for the identified impacts within the planning area; however, it is not clear if these mitigation measures are binding in the event there are amendments to these plans and ordinances in the foreseeable future.*
5. *How will the County ensure that mitigation measures are implemented as planned?*
6. *Does the County of Marin Community Development Agency have the budget and staff to support development proposals for more than 750 units¹ per year?*

Specific Comments by Chapter

1. Chapter 1: Introduction

- a. We do not understand the equal distribution model for housing sites as a programmatic goal in unincorporated Marin County when there are significant and unavoidable impacts related to water availability, environmental hazards, wastewater, and the lack of job and transportation centers.

This decision has resulted in the Housing Element exceeding Vehicle Miles Traveled (VMT) thresholds causing the County’s proposal to be inconsistent with the Plan Bay Area 2050, BAAQMD 2017 Clean Air Plan, and the County of Marin Climate Action Plan 2030.

2. Chapter 3: Project Description

- a. The final list of Candidate Housing Sites was not included in the DEIR². The only table of sites in the DEIR is within Table 3-3 and is labeled Proposed Project Sites.
- b. *Where can the public find the Candidate Housing Sites list? There are multiple versions of lists online, and it is not clear which list to reference.*

Why was it not included in the DEIR when there are references to these sites throughout the document?

¹ A rough estimate calculated at 6,000 units divided by 8 years = 750 units per year.

² County of Marin, *Housing and Safety Element, Draft Environmental Impact Report*. Chapter 3, Page 30, Section E indicates the initial study included 10,993 possible “Candidate Housing Sites” and 150 sites contained development potential to allow 10,993 units, including Accessory Dwelling Units, and Density Bonus Allowances. A link or appendix reference to this list of 150 sites is not contained in the DEIR.

Why do some chapters analyze the full list of Candidate Housing Sites while others only analyze the Potential Project Sites?

3. Chapter 4: Aesthetics

- a. There are inconsistencies in the DEIR related to the policies of the Countywide Plan to address design and resource protection at the community level, promote infill, preserve visual quality, direct land uses to appropriate areas, concentrate urban development in the City-Center Corridor, etc.³

Decisions for future development should be directed by the Countywide Plan, as it has been upheld and strengthened by more than 40 years of case law.

How is the County reconciling these inconsistencies within the DEIR where the Countywide policies have not been applied as guidance for site selection?

What is the County's justification for failing to apply the planning guidance of the Countywide Plan in the site selection process?

4. Chapter 5: Agricultural Impacts

- a. The DEIR notes that there are no significant impacts related to agriculture as the only Project impact is related to the conversion of farmland to non-agricultural use⁴ and that agricultural zoning allows for residential development. The problem with this conclusion is that agricultural zoning allows for farmworker housing development, not conversion to multi-unit market-rate housing on agricultural lands.

Can the County explain this interpretation of agricultural land-use zoning and how the allowance for much-needed farmworker housing is being redefined as allowing market-rate housing on agricultural lands?

- b. To mitigate the conversion of A-60 zoning to urban sprawl, the County proposes to change the zoning on parcels and expand the City-Center Corridor.

This fails to honor the Countywide Plan's mandate and the public's desire to limit development to the City-Center Corridor near job and transportation corridors.

- c. In past meetings of the Planning Commission and Board of Supervisors, the Lucas Valley A-60 site (Site ID: 53) was requested to be removed from the Candidate Housing List by Supervisors Connelly and Rodoni; however, this site remains on the Proposed Project Site List. This could have significant negative precedent-setting impacts and reduce the carbon sequestration goals provided by fallow or working lands.

Why is the Lucas Valley, Site ID 53 still listed? Is this location being considered for rezoning?

³ Chapter 3, Page 7. Example Policies DES-1.1, DES-3.1, DES-4.1

⁴ Chapter 5, Page 13.

5. Chapter 6: Air Quality

- a. The intent of SB 375 is for Metropolitan Planning Organizations (MPOs) like the Association of Bay Area Governments (ABAG) to develop a sustainable communities strategy (SCS) to meet the air resources board standards with land-use and transportation policies to reduce the number of vehicle miles traveled (VMT) that ultimately assist the State of California in meeting (GHG) emissions reduction targets.⁵

ABAG developed Plan Bay Area 2050 that outlines Priority Development Areas which are areas that are not located in the unincorporated areas of Marin County. Following the general guidance of Plan Bay Area 2050 and the Countywide Plan, site selection should have been consistent along the 101 corridors promoting infill and redevelopment of commercial areas to accommodate potential housing. Instead of following this planning guidance, the County of Marin has spread potential housing sites across rural unincorporated areas creating VMT growth at a faster rate than the population.⁶

The DEIR states in Chapter 6, page 35:

The growth that could be facilitated by adoption of the proposed Housing Element Update would be inconsistent with the BAAQMD 2017 Clean Air Plan (see Impact 6-1) and, as discussed under Impact 6-2, could facilitate future development projects that generate construction emissions in excess of the BAAQMD's recommended regional CEQA thresholds, despite the implementation of Mitigation Measure 6-2.

Mitigation measures in the DEIR fail to change this impact making it significant and unavoidable⁷. Transportation and traffic congestion impacts are not analyzed in the DEIR for the Project areas and the nearby communities that would experience increased traffic from rural areas in maps or information that could be in the DEIR packet.

Why and how were the sites selected for this Project outside of the guidance of Plan Bay Area 2050 and the primary planning policies of the Countywide Plan?

Did the County analyze impacts on VMT compared to Sonoma County? The 118 units in Tomales and the 160 units in Point Reyes listed in the Proposed Project Sites are more likely to commute to Petaluma as a job center or access to the 101 Corridor.

If VMT was analyzed on impacts to Sonoma County, what impact does this have on Sonoma County's Climate Action Plans and their Regional Housing Needs Assessment?

6. Chapter 7: Biological Resources

- a. The Planning Area includes 140 special status plant species⁸, 109 special status animals, 8 natural communities and vegetation alliances as classified by the California Department of Fish and Wildlife, and 11 Critical Habitat Areas.

The DEIR notes multiple potential impacts to 20 threatened or endangered species and 11 Critical Habitat Areas that are included in the *site inventory* (emphasis added) and that sensitive

⁵ Fulton, William. *A Guide to Planning in California*, 5th ed., Solano Press Books, Point Arena, CA, 95468, pp. 105–106.

⁶ Chapter 6, Page 23.

⁷ Chapter 6, Page 35.

⁸ Chapter 7, Page 3.

vegetation alliances and associations may be present in the Planning Area, and a detailed analysis for these communities would be required on a project-by-project basis.

What is the site inventory? Is this the Candidate Housing Site, Proposed Project Site List, or another list?

Will a site-level analysis be required on a project-by-project basis for future by-right development projects? If not, those sites should be removed from all lists the County is including in the Housing Element.

- b. The DEIR is inconsistent with Countywide Plan Biological resources chapter related to site selection and potential for development to limit development impacts and fails to provide a site-by-site inventory of direct conflicts with the biological policies of the Countywide plan for impacts to special status and endangered species, critical habitat areas, wetlands, and coastal resources.

The kitchen sink approach to the site selection places habitat and species in direct risk as the programmatic DEIR is missing any site-specific details and mitigation to address these impacts.

- c. The DEIR fails to provide mapping of the Potential Project Sites or Candidate Housing Sites with biological resource overlays to understand where biological resources may be located with project densities or potential impacts to species and habitats.

Where can the public locate information about a specific site within the DEIR to understand the potential impacts or additional requirements for mitigations and environmental reporting?

- i. Special Status Species and Sensitive Habitats. Projects that may have a potential impact with a special status species require a biological resources site assessment. However, special-status species will only require a future study of a proposed location if there is a potential impact and the DEIR notes:

The County shall review the results of the biological resources site assessment to determine whether impacts to Special-Status Species are likely to occur and the actions needed to avoid identified impacts, as well as to determine if additional County permits are required, and the appropriate level of CEQA review.⁹

Do these mitigation measures apply to projects after 8 years when they are deemed by-right?

7. Chapter 9: Geology and Soils

- a. The DEIR notes Impact 9-5 potential impacts related to soil incompatibility for use of septic tanks or alternative wastewater disposal systems.

As a precautionary measure, areas that are near shorelines should be removed from all site selection lists, as it is not realistic to add new onsite wastewater treatment based on sea level rise projections.

⁹ Chapter 2, Pages 19-20.

8. Chapter 10: Greenhouse Gas Emissions and Energy

- a. Impact 10-1 highlights that the housing growth associated with the Project would generate GHG emissions in significant quantities and would be inconsistent with the CARB 2017 Scoping Plan, MTC/ABAG Plan Bay Area 2050, and County 2030 CAP.¹⁰

The DEIR notes, it is possible that the implementation of the Project could impede the ability to meet regional transportation GHG reduction goals established by Plan Bay Area 2050...this would be a potentially significant impact.¹¹

The methodology in this chapter indicates that the GHG emissions in the Project Area were estimated using the emissions inventories and forecasts contained in the County 2030 CAP¹² and specifically notes that the 2040 land-use data projections: 40,811 housing units/population of 90,170,¹³ yet the Project exceeds the County 2030 CAP goals by almost 13,000 units that are adding emissions to energy, natural gas, consumption, mobile source emissions, and other emission sectors.¹⁴

It is unclear how the Project is in alignment with the County's growth projections or how the growth rate has been determined that has far-reaching implications on GHG emissions.

If Marin County is unable to meet the regional and local goals for GHG reduction in emissions due to this Project, are other jurisdictions also out of compliance with the MOP regional plans like Plan Bay Area 2050 and the CARB 2017 Scoping Plan?

What are the implications of the Project on the County 2030 CAP? It seems like the goals and projects identified in the CAP must be updated if the County is able to meet emission reduction goals.

What are the short-term and long-term implications of failing to meet the GHG emission reduction goals? Does this place California's GHG reduction goals at risk?

- b. Plan Bay Area 2050 includes strategies to reach 20% GHG reduction goals to spur housing development at all income levels, including allowing a greater mix of housing densities in growth geographies; building affordable housing; integrating affordable housing into all major housing projects; and transforming aging malls and office parks into neighborhoods.¹⁵

It is unclear whether Marin County applied these strategies in developing the Candidate Housing Sites or Proposed Project Sites lists based on some of the site selections in the Coastal Corridor that identified single-family home parcels for development in rural areas away from public transportation and job centers.

- c. The Plan relies on a variety of mitigation measures to reduce the VMT of the Project, including requirements that residential development be able to achieve specific VMT significance thresholds 15% below the regional average VMT through strategies depending on the site and availability of nearby transportation services through the utilization of Transportation Demand

¹⁰ Chapter 10, Page 36.

¹¹ Chapter 10, Page 36.

¹² Chapter 10, Page 36.

¹³ Chapter 10, Pages 38.

¹⁴ Chapter 10, Page 42, See Table 10-9.

¹⁵ Chapter 10, Pages 20-21.

Management (TMD) strategies to play a major role.¹⁶

Based on the site lists,¹⁷ areas that are identified for development that are outside of the City-Center Corridor are not near adequate public transportation or job centers will be difficult to reduce VMT. Furthermore, reliance on bike travel is not feasible where there are no dedicated bike lanes on narrow and winding roads. In short, it is dangerous. Most cycling that occurs in the Coastal Corridor is not for the commute but for recreational cycling.

Is the County considering improving roadways for bike lanes in Coastal Areas targeted for residential commute use? For example, are bike lanes and roadway improvements from Inverness to Point Reyes Station or San Geronimo Valley to Fairfax or Point Reyes being considered to make commuter bike travel safer?

How can the County rely on Safe Routes to Schools as a mitigation measure in Coastal Corridor communities where students may reside miles from their local school? For example, students in Inverness and Point Reyes Station attend Tomales High School, and many students reside on ranches typically traveling a significant distance by bus.

Alternative 2, removes 354 units, leaving 482 units in the Coastal Corridor. The site removal seems only based on a specific methodology and not in alignment with projects on the ground or realistic travel. For example, Alternative 2 removes the Coast Guard Site from inclusion in the Project while leaving small residential sites in Inverness and more challenging development projects like the Grandi Building.

It would be helpful to have a new Alternative presented that took into account the reduction of VMT and realistic site selection based on project readiness to ultimately remove additional sites from the Coastal Corridor to reduce the overall VMT threshold.

If an additional 200 units within the Coastal Corridor were removed¹⁸ and replaced with sites within the City Center Corridor, would this significantly reduce the VMT total?

Are lands identified in the County 2030 CAP for carbon sequestration included in the Proposed Project Site list or Candidate Site List? If so, why are those not removed since the County 2030 CAP relies so heavily on soil sequestration?

9. Chapter 11: Hazards and Hazardous Materials

- a. It is a concern that it was not analyzed the potential consequences of unbundling parking units¹⁹ that could allow increases in street parking and how this may impact evacuation routes and emergency vehicle access on narrow roads.

¹⁶ Chapter 10, Page 46.

¹⁷ List implied to include, Proposed Project Sites, Candidate Sites, and Inventory Sites

¹⁸ Leaving project ready sites like the Coast Guard Housing in Point Reyes Station.

¹⁹ Chapter 6, Page 27, Mitigation Measure 6-1; and Chapter 10, Page 48; Mitigation Measure 10-1.

10. Chapter 12: Hydrology and Water Quality

- a. The beauty of Marin’s Countywide Plan is that it applies a precautionary approach to planning, which now more than the last 50 years, is crucial as the impacts of climate change are just being understood and the modeling improves each year. As an example, the County has included an update to the Safety Element to study the impacts of groundwater intrusion. This was not considered only a few years ago.

To continue with this precautionary planning, the County should remove sites that are within 100 feet of shoreline, wetland, or creek. Otherwise, projects could be approved to provide new residential housing that will be at risk of flooding events in the foreseeable future placing strain on emergency and community services programs.

- b. The DEIR relies completely on mitigation measures to protect freshwater resources and water quality based on existing federal and state environmental regulations that would fully mitigate impacts deeming the impacts from this project as less than significant.

However, multiple sites identified in the Coastal Corridor are near creeks, wetlands, and shorelines that will be subject to flooding and environmental hazards associated with rising sea levels and groundwater intrusion. If the existing regulatory framework fully mitigates impacts, why are sites in flooding areas on the lists? It does not make good sense to include sites in Olema (wetland) or the shorelines of Tomales Bay.

11. Chapter 13: Land Use and Planning

- a. Rather than repeating ourselves, see our comments related to the VMT, inconsistencies with regional and local plans, and general questions regarding site selection and equal distribution of sites. Ultimately, the site selection process was not informed by these regional and local planning efforts and has resulted in multiple inconsistencies in public planning including MTC/ABAG Plan Bay Area 2050, the CARB 2017 Scoping Plan, the Marin County 2030 Climate Action Plan (CAP), sections of the Marin Countywide Plan that the County has not identified for an amendment to meet the Project goals.

The selection of more than 830 units in the Coastal Corridor is interesting because this is not a major job center. People would need to work locally, remotely, or commute an hour or more to existing job centers that increase VMT.

It is also concerning that new housing could be converted to second homes and vacation rentals, exacerbating the existing problem of lack of residential housing in coastal communities.

What policies are included in the Housing Element or adjacent planning document to protect potential housing from being removed from the residential housing stock?

12. Chapter 16: Housing & Population

- a. The tables and information on housing and population indicate a 12% growth that was assigned to Marin County from ABAG. Looking at historic census data, the growth rate from 2000-2010 was 3% and from 2010-2020 was also 3%.²⁰

It is unclear where the 12% expected growth rate is being calculated and if this figure includes new population totals, existing residents who are unable to afford housing in Marin, and individuals who are inadequately housed. What does the growth rate include?

13. Chapter 17: Public Services

- a. The analysis of the impacts on public schools is incomplete. Table 17-1 is missing school enrollment information for 41% of the schools, and school capacity is missing from 76% of the sites. The DEIR also notes that there would be a 13% increase in students in the unincorporated area, which may impact school enrollment and facilities.²¹

The DEIR is missing critical information on school capacity limits and current enrollment to analyze the impact on schools.

Has the County conducted outreach directly to the school district boards that may be impacted by this Project? Some schools are discussing downsizing programs in unincorporated areas due to low enrollment. If school districts have not been notified, why not?

- b. This growth plan is out of alignment with the school district's plans and projections on enrollment in the coming years. If school districts are making the decision to reduce staff based on current population totals and enrollment, there will be another impact in the next 8 years on the ability of schools to provide educational services to the new populations based on housing growth plans and there may be challenges in obtaining adequate staffing as there is currently a teacher shortage.

Did the County analyze the potential impacts of new residential housing against congestion models near public parks, recreational areas, and beaches?

14. Chapter 18: Transportation Services

- a. The VMT with this Project is significant and unavoidable, even with mitigations. Sites in the Coastal Corridor are not near transit or job centers and create impacts.

As mentioned above, are there plans by the County to upgrade public services or bike lanes in the Coastal Corridor to reduce VMT?

- b. The DEIR notes that emergency access is deemed less than significant, as “all potential housing sites are located on or adjacent to public streets that are sufficient width to support two-way traffic and accommodate emergency response vehicle circulation.”²²

²⁰ Census Totals, USAFacts.org. Available at www.usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/california/county/marin-county.

²¹ Chapter 17, Pages 8. Table 17-1.

²² Chapter 19, Page 32.

This is a factual misrepresentation; first, it is unclear what sites are analyzed in this Chapter of the DEIR (the Proposed Project Sites, the Candidate Sites, or the Site Inventory). Second, even with the constrained Proposed Project Site list locations like Balmoral Drive in Inverness are located up a narrow road with blind corners, no sidewalks, and could be blocked by traffic or hazards in an emergency. Many of West Marin's villages are only accessible by one way.

Furthermore, the Coastal Communities receive more than 2.5 million visitors to the area annually. It is common for roads to be blocked by illegally parked vehicles that prevent emergency access. Adding more housing, and thus parking needs, in already congested areas is problematic.

15. Chapter 19: Utilities and Service Systems

- a. The impacts on public services that supply freshwater and provide sewage treatment are potentially significant and unavoidable. The growth projections in the DEIR exceed freshwater resource availability, areas with well water may not be able to find water to service the parcel, and wastewater processing exceeds the capacity of some districts and may trigger capacity updates.

The impacts on the water supply could exceed resource availability and the mitigation measures list requirements for holding tanks, expansion of water lines, dependency upon outside water suppliers, etc. This places pressure on already strained water resource districts, as we are in the middle of a long-term moderate to severe drought.

Strategic removal of sites that do not have access to water connection hookups, are in water districts that are on a moratorium, or lack the ability to provide water resources, and have overlapping impacts to other areas (critical habitat areas, impacts to species, not connected to wastewater treatment, etc.) should be prioritized.

- b. Impacts on wastewater processing and the uncertainty that a given parcel can accommodate a proposed housing site's wastewater treatment needs create cumulative significant and unavoidable impacts.²³

Due to the inability of the Project to analyze wastewater processing, we recommend the strategic removal of sites that are not connected to existing wastewater processing facilities. Identifying sites with inadequate resources is speculative at best. At worst, it sets the County up for a failure to meet its mandate.

- c. As is true in other sections, it is unclear whether this evaluates the Potential Project Site List or the Candidate Site List. Please clarify in a summary table which chapters of the DEIR analyze each list for the public.

See our list of questions 1.a. Regarding the equal distribution of housing sites. It again highlights the problem of expanding development on this scale in rural areas due to the lack of public infrastructure and services available to meet these needs. Many of these areas are struggling to meet existing demand.

²³ Chapter 19, Page 57.

16. Chapter 22: Alternative 2

- a. This alternative seeks to improve VMT to benefit air quality and GHG emission reductions. However, even with the proposed mitigations and modified site selection to remove 354 units from the Project Area, it still results in significant and unavoidable impacts.
- b. Alternative 2 removes the Coast Guard Property from development consideration, leaving smaller sites in the Coastal Corridor. This is an illogical choice since the Coast Guard Housing project is well into the planning phase. In other words, these 50 units are highly likely to be developed in the next 8 years.

Was the site selection in Alternative 2 guided only by the VMT screening methodology removing larger in-fill development sites based on size rather than project feasibility.

- c. Table 22-1: Reduced VMT Alternative²⁴, is difficult for the public to read and understand what is being proposed as the Housing Site names identified on this table do not reference the Site ID or Site Location Name from Table 3-3.

To figure out which locations were being removed, we had to manually match against Table 3-3 and make our best guesses at which site was being referenced.

- d. Specific issues or questions Table 22-1
 - *Housing Site “6750 Sir Francis Drake” does this match Table 3-3: Site ID: 61, Site Name: Office - Lagunitas (upper floors and rear property)?*
 - *Is Site ID: 126 in Tomales still included as a potential development in Alternative 2? We had to match parcel numbers that were listed back to Table 3-3 and are unsure if it leaves 4 units in “Vacant Tomales” as potential development in Alternative 2.*

17. Chapter 22: Alternative 3

- a. This alternative seeks to reduce impacts on water and wastewater impact, but again it screens based on the location and scope of the project and not on project feasibility for development. For example, Bolinas Land Trust projects are removed from this alternative while the Coast Guard Housing site is not. This appears illogical since the Coast Guard project is already well underway in the planning phase.
- b. Table 22-2: Housing Site Removed from Utility Service Providers²⁵ is difficult for the public to read and understand what is being proposed, as the Housing Site names identified in this table do not reference the Site ID or Site Location Name from Table 3-3.

To figure out which locations were being removed, we had to manually match against Table 3-3 and make our best guesses at which site was being referenced.

- c. Specific issues or questions Table 22-2

²⁴ Chapter 22, Pages 19-20.

²⁵ Chapter 22, Pages 32-33.

- *Housing Site: “534 Overlook” is this matched to 530 Overlook noted in Table 3-3 as Site ID: J, Site Name: 530 Overlook in Bolinas?*
- *Housing Site “13270 Sir Francis Drake” is this matched to Table 3-3: Site ID: 33, Site Name: Inverness County Site?*
- *As noted in Alternative 2, Site ID: 126 in Tomales still included as a potential development in Alternative 2? We had to match parcel numbers that were listed back to Table 3-3 and are unsure if it leaves 4 units in “Vacant Tomales” as potential development in Alternative 2.*
- *There are 8 sites that are not listed in Table 3-3 that we assume are part of the Candidate Housing Site List that is not included in the DEIR. We listed those in the table below. It is unclear why these sites are in Alternative 3 and which list they come from.*

Site ID	Site Location / Name	Village	RHNA	Alt 2	Alt 3	Notes
?	102-062-01 Dillon Beach Road	Tomales	?		-4	Site not on Proposed Project List
?	29 John Street	Tomales	?		-5	Site not on Proposed Project List
?	102-080-19/10/20 State Rte 1	Tomales	?		-58	Site not on Proposed Project List
?	209 Dillon Beach Rd	Tomales	?		-13	Site not on Proposed Project List
?	26825 State Rte 1	Tomales	?		-13	Site not on Proposed Project List
?	26845 State Rte 1	Tomales	?		-3	Site not on Proposed Project List
?	200 Valley Ave	Tomales	?		-6	Site not on Proposed Project List
?	27275 State Rte 1	Tomales	?		-3	Site not on Proposed Project List

- *If these are on the Proposed Project Site list, please provide the Site ID for these. Ultimately, this is confusing to understand which sites are included in the DEIR based on the changes in the alternatives.*
- *Why do the alternatives include sites that are not listed in the Proposed Project List?*

18. Suggestions to Improve Readability for the Public in the Final EIR

- Update to include the entire list of Candidate Housing Sites, as there is missing incomplete information in the DEIR to understand the entire scope of this project.

Alternatives 2 and 3 reference sites that would be removed from the project plan, however, multiple sites are not included in the DEIR Proposed Project Sites list in Table 3-3. They are most likely from the Candidate Housing Site list that is not included in the DEIR for public review.

Improve Site List Reference Organization. Table 3-3 includes the Proposed Project Sites with a Site ID and Site Name that are not used in Alternatives 2 and 3. This makes it difficult for the public to know which locations are being removed in both Alternatives. The Site ID and Site Name are helpful and should be used throughout the document, in applicable tables, and in the alternatives.

- b. The DEIR is almost 800 pages long (without the appendices) and costs more than \$150 to print.²⁶ It is important to ensure the online readability of PDF files for the public.

Please add PDF chapter bookmarks and hyperlinks in the Table of Contents and Lists of Tables for the public to navigate by chapter through the document to make reading easier.

- c. The DEIR includes tables that fail to carry forward headings and consistent formatting (centering numbers) throughout.

Please ensure formatting consistency in tables and keep table headings and columns with the next to ease readability.

Conclusion

In conclusion, we recommend the creation of a **new** combined alternative that would incorporate aspects of Alternative 2 to reduce VMT and Alternative 3 to reduce impacts on water resources and wastewater that is balanced overlaying a project feasibility overlay that retains sites that are currently moving forward with development plans or are highly likely to be developed.

For example, in the Coastal Corridor, we recommend retaining the Coast Guard Property and Bolinas Land Trust projects while removing single-family home locations that lack access to water and would have wastewater processing issues and possibly other biological resource impacts.

This will hopefully ensure that appropriate sites are developed in 8 years before by-right sets in, losing local control and oversight.

Thank you for the consideration of our comments and your work on this challenging project.

Sincerely,



Morgan Patton
Executive Director

²⁶ Quote from Kinkos printers for two-sided black and white printing.