

DRAKE AVENUE APARTMENTS PROJECT RESPONSES TO PUBLIC COMMENTS ON THE ENVIRONMENTAL ASSESSMENT

The Environmental Assessment (EA) for the Drake Avenue Apartments Project (proposed project) was circulated for public comment from April 7, 2023 to April 24, 2023. During the public comment period, 62 written comment letters were received from individuals and two comment letters were received from groups. All comment letters are attached to this document. The comment letters were submitted by the following individuals and groups:

Individual Commenters	
First Name	Last Name
Alexis	Wise
Alida	Lasker
Angela	Miller
Anne	Wagner
Ariel	Soto-Suver
Barbara	Killey
Carol	Chandlee
Carol	Soto (2 comment letters)
Cherie	Velyines
Damion	Bullock
Dave	DuPont
Debra	Turner
Deidre	Kernan
Don	McCrea
Dorte	Bot
Edward	Hyman
Elizabeth	Smalley
Eos	Mahassine
Erin	Skiffer
Felecia	Gaston
Irene	Garcia
Jamie	Whittington
Janet	Karel
Jasmine	Curtis
Jennifer	Colin
Jennifer	Conway
Jennifer	Spinach
Joyce	Martha
Juanita	Collins
Kristin	Andersen
Kyle	Hara
Leon	Silverman
Leslie	Allen
Leslie	Hara
Margaret	MacLean
Marguerite	Moriarty
Marilyn	Long
Mary	Nahorniak
Michelle	Mokalla
Mickey	Allison
Milena	Fiore

Monica	Oriti	
Nancy	Miller	
Nancy	Peach	
Pamela	Ross	
Pat	Houden	
Patrice	Villars	
Rebekah	Helzel	
Robert	Hollingsworth	
Ronald	Kong	
Sam	Soto-Suver	
Sandra	Mausner	
Scott	Shapiro	
Shari	Hansen	
Shirin	Ami-Alikhani	
Susan	Shea	
Toni	Wittenmeier	
Traci	Schilling	
Tracy	Tandy	
Groups		
First Name	Last Name	Organization
Bettie	Hodges	Save Our City
Debra	Turner	
Felecia	Gaston	
Marilyn	Mackel	
Rondall	Leggett	
Terri	Green	
Tiawana	Bullock	
Kevin	Haroff	Golden Gate Village Resident Council

In addition to the above written comment letters, six verbal comments were received, in the form of voicemails, from the following individuals:

- Anne Jefferson;
- Ariel Soto;
- Barbara Killey;
- Carol Soto;
- Elaine Dempsey; and
- Elizabeth (last name not provided).

Marin County, as Responsible Entity, is responsible for reviewing and considering all public comments received during the public comment period. The County has considered all substantive comments received during the comment period and provides the following responses in accordance with statutory and regulatory requirements. The responses amplify or clarify information provided in the EA and/or refer the reader to the appropriate place in the document where the relevant information can be found. Revisions to the EA text were not required in response to the comments.

The County maintains their finding pursuant to the Code of Federal Regulations Title 24 (24 CFR), Part 58, Section 58.40(g)(1), that the project would not result in a significant impact on the quality of the human environment, and that this is sufficiently demonstrated through the analysis presented in the EA. The County also maintains that the EA has been prepared in compliance

with all relevant sections of 24 CFR Part 58, Section 58.40 in particular, including adequate analysis of the project's compliance with Sections 58.5 and 58.6.

The majority of comments received were generally opposed to the proposed project for varying reasons; however, most of the comments were not substantive (i.e., did not identify specific concerns regarding issues relevant to the analysis within the EA, which was prepared in compliance with the requirements established by the National Environmental Policy Act [NEPA]), did not provide sufficient evidence to support their claim or opinion, or did not provide sufficient specificity to allow for a detailed or meaningful response. However, several comments received did identify specific areas of concern that are relevant to NEPA analysis. Many of the commenters raised similar concerns. Thus, the County has addressed the common topics in a comprehensive manner, including thematic comments that are relevant to the NEPA analysis, as well as some that are not substantive (i.e., that pertain to issues that are not considered significant impacts on the environment under NEPA).

The environmental review process provides an impartial evaluation of the environmental impacts should the proposed project be implemented, and not opinions on whether the project should be approved or denied. The County, as the Responsible Entity with land use authority, is the primary agency providing information and recommendations on land development to decision-makers, and is required to weigh factors outside the scope of the EA, including public support, taxes, jobs, economic benefits, and other non-environmental factors, in considering approval of a project. However, comments regarding these topics do not concern environmental impacts; therefore, they are hereby noted for consideration for final decision on the project.

A summary of the thematic areas of concern, as well as detailed responses to such concerns are provided below.

Public Review Period

Multiple comments received on the EA expressed the opinion that the public has had insufficient time to review the proposed project. In compliance with NEPA guidelines, the EA, as well as all associated documents, was made available to the public on April 7, 2023, when the associated Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds (FONSI/NOIRROF) was made available in the local newspaper and on the County's website. In addition, the FONSI/NOIRROF was mailed to 37 interested parties and 3,000 copies were printed by the County and distributed by a local nonprofit serving Marin City, Performing Stars of Marin. The comment period ended on April 24, 2023.

On April 17, 2023, County staff received a letter from Mr. Haroff with Haroff Law P.A. requesting an extension beyond the April 24th comment period deadline. County staff responded in a letter dated April 18, 2023 in which it was affirmed that staff had reviewed the record, including the comment letters received up to that point and made the decision to respectfully decline the request for comment period extension. A copy of the letter is included in the attachments to this Response to Comments document. Further, on April 24th, prior to the close of comments, County staff reviewed the record, including the comment letters received and made the determination to close comments as proposed in the FONSI/NOIRROF.

Project Design

Many commenters have expressed concern about the design of the proposed project, including the height of the proposed structure, the amount of on-site parking proposed, and the proposed

density. Some commenters expressed concern regarding the blockage of sunlight from the project impacting the Village Oduduwa senior facility. It is important to note that the design of the proposed project is a planning and policy concern and not a concern evaluated under NEPA. In the case of the proposed project, the Planning Division of the Marin County Community Development Agency is responsible for ensuring the design of any new development is consistent with the County's vision and applicable laws and regulations, including compliance with design standards. NEPA requires the evaluation of the physical environmental effects of a proposed project. The EA was prepared in compliance with NEPA requirements.

As discussed in the EA, beginning on page 33, the Marin County Countywide Plan designates the project site as Multi Family 11-45 units per acre (MF 4.5), which typically allows residential densities between 11 and 45 dwelling units per acre (du/ac). The proposed project would include the development of 74 residential units on an approximately one-acre project site, for a density of 74 du/ac. However, because the proposed project would provide 100 percent affordable housing, the proposed project would qualify for an 80 percent density bonus, which would allow the development to exceed the normally allowable maximum density for the land use designation. Thus, the proposed project would be consistent with the General Plan land use designation.

The project site is zoned Residential Multiple Planned 34 units per acre (RMP-34), which is intended for a full range of residential development types within the unincorporated urban areas of Marin County, including single-family and multi-family residential development, and limited commercial uses in suburban settings. The RMP-34 zoning district typically allows for a maximum density of 34 du/ac. As stated above, although the project would have a density of 74 du/ac, following the approval of a density bonus, the proposed project would not conflict with the land use designation's maximum allowable density. A Zoning Compliance Review for the proposed project was approved in November 2020, given Government Code Section 65915 (State Density Bonus Law) and Section 65913.4 (Senate Bill 35). Thus, the proposed project was determined to be consistent with the assigned zoning designation. Accordingly, as stated in the EA, the project is consistent with the applicable General Plan designation and all applicable General Plan policies, as well as with the applicable zoning designation and regulations. In addition, the proposed project would be consistent with the multi-family residential developments in the immediate project area.

As discussed on page 34, of the EA, according to the County's Zoning Compliance Review, the proposed project would qualify for a parking reduction and the project would remain in compliance with County standards. Moreover, EA Factor; Transportation and Accessibility (Access and Capacity) describes in detail that the project will also be served by a bus route, a bike lane and has met the criteria for adequate on site and potential off-site parking as necessary. Moreover, the level of service (LOS) standard for the surrounding intersections are still meeting traffic requirements for normal wait times, therefore the project as proposed is not out of compliance with traffic standards. Because the EA is only required to demonstrate the project's conformance with General Plan and Development Code requirements, further analysis of impacts related to parking is not required.

Furthermore, the project has already been approved by the County pursuant to Senate Bill (SB) 35. As discussed in further detail below, the County based its decision on evidence in the record demonstrating that the project complies with the requirements of Government Code Section 65913.4. The statute of limitations regarding the County's decision to approve the project pursuant to SB 35 has lapsed and the approval is in effect.

The proposed project would be subject to review by the County Building Official through the building permit approval process, including review of construction drawings and inspections during each phase of construction. During such process, the County would ensure compliance with all applicable requirements and standards of the Marin County Development Code.

As discussed above, the proposed project has been adequately demonstrated to be compliant with all applicable General Plan and Development Code requirements. However, the County will consider concerns related to the project design prior to making a final decision on the project.

Senate Bill 35

Several commenters expressed opposition to the application of Senate Bill (SB) 35 to streamline the project approval process. Such concerns are not relevant to the adequacy of the EA analysis. However, as noted above, the statute of limitations regarding the County's decision to approve the project pursuant to SB 35 has lapsed and the approval remains in effect. In issuing the approval, the County based its decision and concluded that the preponderance of the evidence in the record demonstrated that the project complies with the requirements of Government Code Section 65913.4 and that there are not any objective inclusionary or exclusionary standards that would disqualify the project from a streamlined, ministerial review process. None of the exclusionary criteria apply to the proposed development in that it is not located in or on a coastal zone, floodplain, earthquake fault zone, hazardous waste site, wetland, or prime farmland. While the property is located in a high fire severity zone, the development will comply with fire hazard mitigation allowable under SB 35. Therefore, the development satisfies all of the objective planning standards of Government Code Section 65913.4(a), and is, therefore, subject to the streamlined, ministerial approval process provided in Government Code Sections 65913.4(b) and (c).

Concentration of Affordable Housing

Many commenters expressed concerns about the placement of additional affordable housing in the project area, stating that a substantial amount of affordable housing already exists in the vicinity. The concern does not address the adequacy of the EA. However, as stated on page 7 of the EA, the project site is specifically identified in the County's 2023-2031 Housing Element as an approved location for the development of affordable housing. The County conducted outreach and consideration of potential sites for affordable housing as part of the Housing Element Update process. As part of that process, the County Board of Supervisors adopted guiding principles for the site selection, which included the following:

- Ensure Countywide Distribution;
- Address Racial Equity and Historic Patterns of Segregation;
- Encourage Infill and Redevelopment Opportunities; and
- Consider Environmental Hazards.

In addition to the above criteria, the project site was identified as an affordable housing site due to the site already having entitlements through SB 35 approved in 2020. As stated above, the statute of limitations regarding the County's decision to approve the project pursuant to SB 35 has lapsed and the approval remains in effect.

Furthermore, as noted above and stated in the EA, the proposed project would be consistent with the site's General Plan land use and zoning designations, and the proposed use would be consistent with the surrounding existing uses.

Disproportionate Impacts to Minority Groups and/or Low-Income Populations

Multiple commenters expressed concerns about proposing additional affordable housing in an area that commenters state is mostly comprised of minorities and low-income populations. Pursuant to NEPA, an EA is required to evaluate a project's physical effects on the existing environment, including the surrounding community, regardless of race or income levels. The EA addresses all such physical environmental effects and includes mitigation measures, where necessary, to ensure that any such effects would not be significant. Furthermore, an EA is required to include analysis of environmental justice, meaning that the EA must analyze whether the proposed project would create a disproportionately high and adverse human health or environmental effect on minority and low-income populations. As discussed on page 41 of the EA, the project site is not located within an area that is subject to adverse environmental effects.

Traffic

Many commenters expressed concerns related to increased traffic in the project region following buildout of the proposed project. As discussed above, the proposed project would be consistent with the site's General Plan land use and zoning designations. As such, trips generated by the proposed project, as well as any related increases in traffic, have been anticipated and analyzed by the County in the Environmental Impact Report (EIR) prepared for the County's General Plan. As discussed on page 48 of the EA, the nearest study intersections to the project site that were evaluated in the Countywide General Plan EIR would operate at level of service (LOS) A or LOS B under General Plan buildout conditions.

According to the ITE Trip Generation Manual, the proposed project would generate approximately 403 daily trips, 27 trips during the AM peak hour, and 33 trips during the PM peak hour. Under the MF 4.5 General Plan land use designation, without a density bonus, buildout of the project site could result in a maximum of 45 dwelling units, which would generate approximately 245 trips per day, 16 AM peak hour trips, and 20 PM peak hour trips. As such, the proposed project would result in an additional 158 trips per day, 11 AM peak hour trips, and 13 PM peak hour trips from what has already been anticipated and could already occur pursuant to buildout consistent with the General Plan land use designation. It is also important to note that, according to the California Department of Transportation, affordable multi-family housing development would result in fewer trips than market rate multi-family housing development due to likely lower than average rates of car ownership and use. As such, the estimate of project trips is conservative. Therefore, the proposed project would not generate vehicle trips such that the LOS at any nearby intersection would degrade to a level considered unacceptable by the County.

Safety

Many of the comments received about the proposed project related to safety concerns. Specifically, commenters expressed concern about circulation hazards, wildfire, flood risk, and hazardous materials. Each concern is addressed below.

Circulation Hazards

Many comments were related to opinions of the existing conditions of streets surrounding the project site, including dangerous turns, narrow roadways, and speeding vehicles. The comments did not include sufficient evidence or detail to support the claim that roads in the project vicinity are unsafe. In addition, such comments do not address the adequacy of the EA. The proposed

project, in addition to all development within the County, would be required to comply with applicable laws and regulations, including compliance with roadway design standards. Furthermore, as discussed above, the proposed project would be consistent with the intended and anticipated use of the site. Thus, buildout of the proposed project would not exacerbate such conditions.

Wildfire

As many commenters stated, the project site is located within a State Responsibility Area (SRA) and a Very High Fire Hazard Severity Zone (VHFHSZ). However, as discussed on page 52 of the EA, the project site is located in a developed urban area. As such, wildfire risks associated with the area are urban in nature, and the Marin County Fire Department, who have been notified of the proposed project, would be capable of controlling any fire that occurs at the site. Furthermore, the proposed project would be subject to all relevant local, State, and federal provisions related to fire prevention, including fire prevention measures such as fire sprinklers and maintenance of vegetation. Therefore, as stated in the EA, wildfire risk is not a significant concern for the proposed project.

Flood Risk

As discussed on page 7 of the EA, the project site is located within an Area of Minimal Flood Hazard. As such, the proposed project would not be subject to substantial flood risk. In addition, as discussed on page 52 of the EA, due to site elevation, even in the most extreme climate change scenario, the project site would not be subject to flooding from predicted sea level rise. Therefore, the EA adequately demonstrates that the proposed project would not be subject to flood-related environmental impacts.

Hazardous Materials

Some commenters expressed concerns about the project site's proximity to hazardous materials sites. The EA addresses all such concerns beginning on page 20. As discussed therein, a Phase I Environmental Site Assessment was prepared for the proposed project, which identified all hazardous materials sites in the project vicinity, and determined that such sites do not constitute an environmental impact on the proposed project.

Public Safety

Some commenters raised the concern of existing crime rates such as theft, homicide, and gang activity. The EA specifically addresses public safety in Environmental Factor: Public Safety-Police, Fire and Emergency Medical beginning on page 36. The EA concluded that adequate public services regarding public safety are available to service the new housing development.

Emergency Access

Several comments received on the proposed project were related to concerns about adequate emergency access to Marin City; specifically, comments addressed the frequent inaccessibility of Donahue Street, which serves as the primary ingress and egress to Marin City. The EA is not required to address such impacts beyond their relevance to the proposed project. While an EA is required to analyze emergency access to the project site, such analysis is not required for the project region as a whole. As discussed on page 48 of the EA, access to the project site would be provided from Drake Avenue and Park Circle; both roads have multiple access points that

would allow emergency responders ingress to the site. In addition, both roadways are designed in compliance with all applicable County standards. Therefore, concerns related to emergency access have been adequately addressed in the EA.

Water/Wastewater Infrastructure

Numerous commenters expressed the opinion that the existing water and wastewater infrastructure in the project area would be inadequate to serve the proposed project due to the age and lack of functionality of the infrastructure. However, evidence to support this claim was not provided, nor was sufficient specificity to allow for a detailed response. In addition, any deficiencies of the existing water or wastewater system should be addressed by the appropriate service providers, separately from the NEPA analysis for the proposed project. The EA is only required to address whether adequate capacity and supplies exists to serve the proposed project, which is addressed starting on page 45 of the EA. As discussed therein, the Marin Municipal Water District and the Sausalito-Marin City Sanitary District have adequate capacity to serve the proposed project with regard to water and wastewater, respectively. Furthermore, prior to buildout of the proposed project, the proposed project would be subject to review by the County Building Official through the building permit approval process, including review of construction drawings and inspections during each phase of construction. During such process, the County would ensure compliance with all applicable requirements and standards of the Marin County Development Code, including the design of on-site infrastructure and connections to existing off-site infrastructure.

Biological Resources

Commenters expressed concerns about the proposed project's impacts to on-site biological resources, including the heritage tree that exists on-site, and impacts to nesting bird species that may occur on-site. As discussed on page 50 of the EA, the project applicant would be required to apply for a tree removal permit prior to the removal of the on-site heritage tree, subject to approval by the County's Community Development Agency. Pursuant to NEPA requirements, the acquisition of a tree removal permit and compliance with the provisions established therein is sufficient for the purposes of avoiding adverse effects to on-site protected trees.

According to the Biological Site Assessment prepared for the proposed project, which is included as an attachment to the EA and the results of which are incorporated into the EA, on-site trees and buildings directly adjacent to the project site could provide habitat for protected roosting bat species, as well as birds protected by the federal Migratory Bird Treaty Act (MBTA). As such, buildout of the proposed project could have the potential to result in adverse impacts upon protected wildlife species. However, the proposed project would be required to comply with the Marin County Development Code section 22.20.040, which requires protections for roosting bats and nesting birds. Compliance with such would be sufficient to reduce impacts to the aforementioned biological resources.

Seaplane Adventures

Multiple commenters expressed concerns about Seaplane Adventures, a business located approximately 1,500 feet north of the project site. The commenters assert that Seaplane Adventures has an unregistered above-ground storage tank (AST) on the premises, and also violates County noise ordinances during operation. The analysis of the EA is limited in that it assumes compliance with all applicable laws for both the proposed project and the surrounding land uses. Moreover, the Seaplane Adventures is under the jurisdiction of the Bayfront

Conservation District, and is outside of the scope of the EA analysis. As such, the EA is not required to address potential impacts related to speculative operations, including any related to the nearby Seaplane Adventures. However, the County will consider the comment prior to making a final decision on the project.

Project Construction

Multiple commenters expressed concerns related to air quality and noise impacts during construction activities on existing residences in the project vicinity. As discussed on page 37 of the EA, buildout of the proposed project would be required to comply with Mitigation Measure 1, which ensures that proper measures shall be taken to avoid air quality impacts during construction, subject to review and approval by the Marin County Community Development Agency. In addition, the proposed project would be required to comply with the applicable noise standards established in the Marin County Development Code. Compliance with such provisions would ensure that adverse impacts would not occur during project construction.

In addition, multiple comments were received stating that the project applicant has not guaranteed that construction work would be locally employed. As stated on page 40 of the EA, it is assumed that the proposed project would provide temporary employment for construction workers; however, the use of local labor has never been guaranteed. Furthermore, the proposed project would still provide employment opportunities for the general region. As such, the proposed project would still have a potentially beneficial impact for the project region. Regardless, the conclusion of the EA would not change. However, the County will consider the comment prior to making a final decision on the project.

Health Care Services

Multiple commenters have expressed concerns about adequate health care services being available to serve residents of the proposed project. As discussed on page 43 of the EA, the Marin City Health and Wellness Center would be the primary source of healthcare for future residents. Commenters have primarily stated concerns about wait times at the Marin City Health and Wellness Center, as well as concerns that residents of the proposed project, as tenants of affordable housing, would not have health insurance, thus limiting their health care options. It is important to note that evidence has not been provided that future tenants of the proposed project would not have health insurance. Furthermore, pursuant to NEPA requirements, the EA is required only to analyze the availability of health care institutions in the project vicinity. As such, the commenter's concerns do not address the adequacy of the analysis of the EA. However, the County will consider the comment prior to making a final decision on the project.

Community & General Services

Some commenters raised concerns regarding the access to basic services and amenities. The EA Factors beginning on page 16 address the services related to sewer, water, garbage/recycling, parks and recreation, public safety and all others that are considered under NEPA. The County will consider the comments prior to making a final decision on the project.

ATTACHMENT
PUBLIC COMMENT LETTERS

From: [alexis WISE](#)
To: [FederalGrants](#)
Subject: Requesting extension for 825 Drake
Date: Monday, April 24, 2023 8:44:46 AM

[You don't often get email from alexiswiselaw@gmail.com. Learn why this is important at [Hello,](https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIF-g&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A_CdpnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=cWBYFKNlul8ILdeq7Us4Dry3o7b5RQNIJMLYXaiDS2I&s=5gOkFt9WLzZ7P-hqrITfCZ1kWeWQI-gMtYWmzA8oRE&e=]</p></div><div data-bbox=)

We at the newly formed Marin City Youth Council and Wise Choices for Girls are requesting an extension for 825 Drake Ave. We believe it's in the best interest for all involved. What happens in OUR COMMUNITY MATTERS!

Thank you,

Alexis Wise

Founder,

WC4G/MCYC

From: [Alida Lasker](#)
To: [FederalGrants](#); [Nazario Benvenuti](#)
Subject: Rescind Approval of project at 825 Drake Avenue
Date: Sunday, April 23, 2023 3:11:34 PM

You don't often get email from alidalasker@gmail.com. [Learn why this is important](#)

To whom it may concern:

My family and I live at 3 Terrace Drive in Marin City. We bought our townhouse in 2016 and love living here. I object to the project at 825 Drake Avenue on the basis that the finding of no significant impact seems completely out of step with reality. How can there only be 23 parking spaces for 74 units? There is simply not enough street parking on Drake and the surrounding streets to absorb more cars. Not to mention that that stretch of Drake is busy with kids visiting the Rocky Graham playground.

We also have a major problem with the amount of density already in Marin City. The focus should be addressing flooding and climate change issues (such as the rise of ground water); we don't need more people in an already dense area. There are so many parts of Marin County that have no affordable housing to speak of - why was Marin City chosen for this project as opposed to some other part of the county? I have not heard an answer to that question.

Please help Marin City fix our current problems; don't add more problems.

Thank you,

Alida Lasker & Nazario Benvenuti, Marin City homeowners

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(917) 822-7601
[**alidalasker@gmail.com**](mailto:alidalasker@gmail.com)

From: [Angie Miller](#)
To: [Sackett, Mary](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Moulton-Peters, Stephanie](#); [Lucan, Eric](#)
Cc: [FederalGrants](#)
Subject: Please Stop Unfair 825 Drake Development Plans in Marin City
Date: Monday, April 17, 2023 2:30:08 PM

Some people who received this message don't often get email from angiemiller70@gmail.com. [Learn why this is important](#)

Dear Supervisors:

Please take action to stop the 825 Drake development in Marin City. I have been a homeowner and resident of Mill Valley since 2009. I look around Marin County and I do not see low cost housing in Mill Valley where I live, or in Tiburon, San Anselmo, Ross, Corte Madera, etc. It is not fair to disproportionately place all low cost housing in Marin City, which already has unfair housing practices burdening this community with substandard housing conditions and delayed justice. Adding more injustice and congestion to this community compounds the years of inequity and disregard for this community. Once again they have not been meaningfully consulted or given a fair opportunity to participate. Please stand up and speak for them, and stop this project.

Your hands are not tied--under SB 35 this project can be denied because it is in a High Fire Hazard Zone and it imposes a disparate impact on Marin City residents.

Sincerely,
Angela Miller

From: [Anne Wagner](#)
To: [FederalGrants](#)
Subject: 825 Drake, Marin City
Date: Friday, April 21, 2023 4:43:42 PM

[You don't often get email from awagner132@gmail.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=0X8cFwPA9BZgmQMjz9Sz80bwNCPmydFy96n0AB1WJEU&s=OOn_flq4IdVdDq1fyr1M1xu4NKHG2EJRn7eXINUA_5w&e=J]

it is apparent that the BOS is intent on using the Marin City Community to accomplish its obligation to improve housing in the County. This was never the intent of the legislation and the voters will see through this.

Extend your considerations immediately and recognize the harm you perpetrating on this community.

Thank you.

Anne Wagner
San Anselmo

From: arielsotosuver@yahoo.com
To: [FederalGrants](#)
Subject: Stop 825 Drake Avenue!
Date: Sunday, April 23, 2023 8:14:58 PM

You don't often get email from arielsotosuver@yahoo.com. [Learn why this is important](#)

The monster project at 825 Drake Avenue that has been thrust upon the residents of Marin City should not be built.

Most importantly, the residents of Marin City know that this project, which is severely out of scale for the area, will negatively impact the nature of their community and are opposed to it. The project will:

1. Increase population density in what is already the densest community in Marin County.
2. Increase traffic congestion and air pollution to the neighborhood. The 825 project does not even provide adequate parking space.
3. Put the low-income Senior residents of Village Oduduwa directly north behind the 825 project in perpetual shadow by cutting off both their views and southern light.
4. Increase hazard risks in the event of flooding, fire or other natural disasters since there is only one road for entering and exiting the city. (Marin City has been classified as a high fire risk by the state.)
5. Add yet more subsidized housing to an area that already has a preponderance of low-income and Section 8 housing.
6. Negatively impact Rocky Graham Playground, the primary outdoor play space for Marin City children and a essential gathering spot for the entire community--by exposing it to significant noise and air pollution (both during construction and afterward.)
7. Removing a heritage coastal redwood from the site.
8. Impact nesting birds onsite by destroying critical habitat.

Please stop this project from happening!

Best,

Ariel Soto-Suver
Resident of Marin City

From: [Barb Killey](#)
To: [FederalGrants](#)
Subject: Extend 825 Drake comment period - Inability and/or extreme difficulty accessing County docs referenced in EA
Date: Friday, April 21, 2023 1:34:31 PM

You don't often get email from killeyb@yahoo.com. [Learn why this is important](#)

Please ignore my email of 12:54 pm. I accidentally hit Send before completing
I am writing to request an **immediate** grant of extension of the comment period to 30 days based upon

1. Inability and/or extreme difficulty accessing County docs referenced in EA.
2. The HUD regulations governing the extension. Specifically, 24 CFR Part 58, Subpart E, Sec. 58.46(a) which states The responsible entity **must** make the FONSI available for public comments for 30 days before the recipient files the RROF when: (a)

There is a considerable interest or controversy concerning the project

If this extension is not granted today, it will be moot, as all the work required to respond to HUD and the County will need to be done by Monday, and it will appear that the County is intentionally trying to prevent the public from responding knowledgeably.

1. None of the documents to which there are links in the County's 92 page Environmental Assessment are available to the public, as they all go to the log-in screen for the HEROS system, to which the general public does not have access.

When I reported this to Tammy Thomas Wed. afternoon (4/19/2023), she created 6 files, ranging from 252 pages to 1,979 pages, (the 4,483 pages was too large to send to me). Thursday afternoon she called me to tell me she had added them to the County's NEPA page containing the documents for 825 Drake.

I was initially thrilled - until I went into the first file. I could find no overall index using the same names as are listed in the EA or method of accessing some of the documents other than scrolling through a long list of URLs.

Tammy is out of the office today through April 26, but Mollie Kron returned my call and has been trying to put the documents in a form that more easily allows matching with the name in the EA. Unfortunately, other than clicking on them one at a time, the only part of the name that I could see was the HEROS #. On her system Mollie could expand the name column and she has sent me 3 pages of screenshots with the names in alphabetical order. I can now find the docs myself.

But, if I send the link Mollie sent me to others who are working on responding to the EA, when they try to open them, they get a msg that they need to enter the email that the item was shared to (me), at which time they would have to let me know they needed the code that had just been emailed to me, and I would have to check my email and give the code to them.

I do not assume that the County is intentionally trying to hide their supporting documents, and I appreciate both Tammy's and Mollie's attempts to be helpful. But, I think a reasonable person would agree that the County providing links that require access to the HEROS system and then providing access in only a very cumbersome way is a significant obstacle to the public's ability to make comments prior to Monday's deadline with sufficient knowledge of the grounds on which the County is drawing their conclusions and basing their decisions.

2. Additionally, the HUD regulations to which the County directs us in the Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds require the extension to 30 days of comment if there is considerable interest or controversy concerning the project. There is no definition in the regs of considerable interest or controversy, but a reasonable person would logically conclude that, in addition to any written comments you have received, the number of emails to Supervisors, number of Objections raised and comments made at BOS meetings, and even the developer's own bigoted comments about the BOS meeting comments indicate both high level of interest and controversy.

Please do this now, and we will try to work within the cumbersome way of accessing documents in order to learn exactly on what grounds the County's EA was based and its conclusions reached.

Barbara B. Killey
415-254-8234

Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has.

Margaret Mead

From: [Carol Chandlee](#)
To: [FederalGrants](#)
Subject: proposed development in Marin City ...
Date: Sunday, April 23, 2023 11:36:01 AM

[You don't often get email from cjchandlee@gmail.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIF-g&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYkISmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mISJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

Can't some architect come up with a more creative solution to housing the homeless , then to build a five story high residence without consideration of environmental and neighborhood function? Do you think we are all not separated, and therefore not connected?. The homeless people need help for sure, but in what direction does it all appear and come from?

I'm objecting to the proposed building, and hope for better creative effective action.

Carol Chandlee

From: [Carol Soto](#)
To: [FederalGrants](#)
Cc: [+smoultonpeters@marincounty.org](#); [+elucan@marincounty.org](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Sackett, Mary](#); [hhall@marinhousing.org](#); [scanson@marinhousing.org](#)
Subject: 825 Drake Avenue
Date: Friday, April 21, 2023 10:49:29 AM

Some people who received this message don't often get email from carol222us@gmail.com. [Learn why this is important](#)

The monster project at 825 Drake Avenue that has been thrust upon the residents of Marin City should not be built.

Most importantly, the residents of Marin City know that this project, which is severely out of scale for the area, will negatively impact the nature of their community and are opposed to it. The project will:

1. Increase population density in what is already the densest community in Marin County.
2. Increase traffic congestion and air pollution to the neighborhood. The 825 project does not even provide adequate parking space.
3. Put the low-income Senior residents of Village Oduduwa directly north behind the 825 project in perpetual shadow by cutting off both their views and southern light.
4. Increase hazard risks in the event of flooding, fire or other natural disasters since there is only one road for entering and exiting the city. (Marin City has been classified as a high fire risk by the state.)
5. Add yet more subsidized housing to an area that already has a preponderance of low-income and Section 8 housing.
6. Negatively impact Rocky Graham Playground, the primary outdoor play space for Marin City children and a essential gathering spot for the entire community--by exposing it to significant noise and air pollution (both during construction and afterward.)
7. Removing a heritage coastal redwood from the site.
8. Impact nesting birds onsite by destroying critical habitat.

I have scant doubt that this project would ever have seen the light of day if it had been proposed for other cities in Marin County such as Larkspur, Belvedere or Ross.

Marin City residents' voices deserve to be heard. Listen to them!

Sincerely,
Carol Soto
San Francisco, CA

From: [Carol Soto](#)
To: [Sackett, Mary](#); +krice@marincounty.org; +drodoni@marincounty.org; +smoultonpeters@marincounty.org; +elucan@marincounty.org
Cc: [FederalGrants](#)
Subject: 825 Drake Avenue
Date: Monday, April 17, 2023 7:15:52 AM

Some people who received this message don't often get email from carol222us@gmail.com. [Learn why this is important](#)

Dear Supervisors,

The residents of Marin City have spoken up loudly. Their voices should be heard! Unfortunately, for too long the County has side-lined their opinions and desires. It is past time to reverse that trajectory.

The proposed monstrosity at 825 Drake Avenue should not be built. It will not serve nor enhance the community. It is another attempt by the county to bundle their state housing mandates in one place.

Marin City has the most subsidized housing in Marin County. It has the highest population density. It does not need, Nor Want the 825 project.
Listen to its residents!

Sincerely,
Carol.Soto

From: [monnalisa Velyines](#)
To: [FederalGrants](#)
Subject: OBJECTION
Date: Thursday, April 20, 2023 5:57:05 PM

You don't often get email from nicolecv925@gmail.com. [Learn why this is important](#)

My name is Cherie Velyines, 69 Cole Drive #11 Marin City C.A.

I am writing to object to the notice of intent to request for release of funds. The 74 until high rise that only allows 23 parking spaces is not even logically possible! This is a set up for disaster.

From: [Mr. Mr.](#)
To: [FederalGrants](#)
Subject: Drakes Avenue Apartments Project
Date: Sunday, April 23, 2023 10:54:31 AM

You don't often get email from iamback411@gmail.com. [Learn why this is important](#)

To whom it may concern. As it now stands, my family and its extended branches have been in residence in Marin City since the town was built in order to house the workers in the Marin Shipyards. I have observed the systematic displacement of the original inhabitants of Marin City over the years and it must cease if such political terms such as "diversity" & "POC" are used in the public vernacular.

The overall issue is "cost of living" and what it takes for respective residence to maintain themselves in such a costly environment.

It is bold as well as oppressive to propose such a development within the confines of Marin City while knowing the majority of its original residence and succeeding generations live in PUBLIC HOUSING.

I have no desire or intent to attempt presenting my argument as a politician by showing grafts, presenting statistics etc.....

The facts are clear, MARIN CITY is the home and sanctuary for ALL families of African descent that have resided here since the creation of the town.

I remember the existence of family/friend owned Barbershops, Dry Cleaners and an actual Grocery Store (Hayden's Market), not to mention a Flea Market.

By outright sabotage (arson) or political maneuvering such establishments have ceased to exist and been replaced by BIG BUSINESS.

There is NO PLACE for individuals/families in such an environment that intends on committing 25 "LOW INCOME" (Section 8) units out of 74 units.

AFFORDABLE HOUSING and ALL respective politicians that use such verbiage have NO desire to assist the public that need housing most. LOW INCOME HOUSING is all that matters for respective residence in Marin City and GENTRIFICATION along with the accompanying modification of school policies, neighborhood "rules" etc.....is the result of building AFFORDABLE HOUSING in Marin City.

Much has changed in the aesthetic of Marin City since its original inhabitants began to "sell" the land they owned, NONE of the change has been to the betterment of COMMUNITY, but rather to the detriment of what community truly is at its core. I AM COMMUNITY !!!!

I presently find myself appealing to a politician for the sake of myself and respective family's legacy and history here in Marin City.

A five story, 74 unit housing development is a BLIGHT on the existing landscape.

My name is Damion Bullock and my family home is at 20 Buckelew St, Sausalito, CA 94965.

Thank you for your time.

From: [David DuPont](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave
Date: Monday, April 24, 2023 10:43:42 AM

You don't often get email from dave@thedupontgroup.net. [Learn why this is important](#)

Dear sir/Madam,
I object to this project at 825 Drake Ave Marin City.
Thank you!

Dave DuPont
415-867-6611
BRE #01355045
Dave@TheDupontGroup.net

From: [Debra Turner Design](#)
To: [FederalGrants](#)
Subject: 825 Drake
Date: Sunday, April 23, 2023 10:23:04 AM

[You don't often get email from debra@dtdesign.org. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mISJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

To Marin County Planning Department:

In the rush to move along the 5-story, 74-unit project several serious mistakes have been made. Among them are outdated maps, outdated fire-danger ratings, miscounted publicly assisted units already in Marin City, and the choice of a developer who is both racist and untruthful.

The AMG development at 825 Drake is inappropriate as a recipient of Section 8 vouchers.

I urge you to DO THE RIGHT THING!

Debra Turner
Marin City resident

From: [Deidre Kernan](#)
To: [FederalGrants](#)
Subject: Proposed development in Marin City
Date: Sunday, April 23, 2023 9:25:02 AM

[You don't often get email from djaykernan@gmail.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mlSJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

I oppose highly this proposed development in Marin City. The longtime residents who live there do not deserve to have more development thrust upon them in an already high density area.

Besides being completely ugly and out of character it will add more traffic into an area that already has only one road in and out. Besides the Golden Gateway there are residences in many other areas of the neighborhood all using the same one road

Deidre Kernan

Sent from my iPhone
Deidre Kernan
210 Bay Vista Circle
Sausalito, CA 94965
Cell 415-272-4328

From: [Don McCrea](#)
To: [Sackett, Mary](#)
Cc: [FederalGrants](#)
Subject: Opposition to 825 Drake Avenue Development
Date: Sunday, April 16, 2023 9:17:15 PM
Importance: High

Mary,

There appear to be several very sound reasons to reject the proposed development project at 825 Drake. The statement below is from the website opposing this development:

With only one way in and out of Marin City, 143 multi-family and single-family units in a 2-block perimeter, and narrow streets surrounding the site, the 825 Development is: Too Big, Too DENSE, UNSAFE, and DISRUPTS THE COMMUNITY'S CHARACTER.

- The complex will severely undermine the safety of Marin City residents by causing traffic congestion which will lead to hazardous conditions during emergency evacuation such as fire or flooding.
- Streets adjacent to Drake Avenue are too narrow to provide fire trucks clear passage.
- 23 parking spaces for a 74-unit complex that is across the street from an active community park is totally inadequate and will contribute to undue congestion and disruption in the neighborhood.
- Lack of cross walks and closeness to public park will endanger children lives due to its location on a blind curve.
- This apartment complex will tax an infrastructure (sewage and drinking water) that has not been upgraded for decades.
- Marin City is the most densely populated community in Marin County and well over 70% of its residential structures are multiple family units.
- Marin City already has a preponderous amount of affordable housing, and the County of Marin is placing an undue burden on Marin City without requiring other communities to absorb their fair share.

Needless to say, this proposed development reflects very poor planning!

I urge you to put a halt to this development until the Board of Supervisors enlists the involvement of a team of advisors comprising members of the Marin City Residents Council and Marin County citizen planning experts to address the broader issues concerning the affordable housing crisis in Marin County. The current development proposal is an "easy" solution to meet the mandated affordable housing requirements placed on Marin County, but it reflects very limited thinking and, one more time, dramatically short-changes Marin City residents.

This county and its wealth of highly creative individuals can create far better solutions if given the opportunity.

The role of the Board of Supervisors is to facilitate solutions to county-wide issues that serve the best and highest good for all of Marin. The Board and County staff, as competent as they are,

provide solutions from a very narrow perspective—that of County government. The outdated model of seeking citizen input and then making the Board’s own decisions based on staff recommendations is severely deficient.

Co-creative solutions are far more effective. They result from collaboration of staff and concerned citizen experts working together. They draw upon the far greater creativity of the community as equal members of the team, rather than just “advisors.”

I strongly encourage the Board of Supervisors to halt the current process and implement a “citizen-government” process as described above.

Mary, I would welcome the opportunity to meet with you—and any other interested supervisors—to explore how this co-creative process can be designed and implemented to provide far more effective solutions to significant County issues—such as affordable housing— that truly do serve the highest and best good for all Marin’s citizens.

Sincerely,
Don McCrea

Don McCrea, Ph.D.
Family & Small Business Exit Plan Architect
Your Business Legacy
The most complete exit planning process available today!
San Rafael, CA 94901
Ph: +1 949-584-0917
Don@YourBusinessLegacy.net
www.YourBusinessLegacy.net
<https://www.linkedin.com/in/donaldmccrea/>

From: [Dorte Bot](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave Development
Date: Saturday, April 22, 2023 1:02:52 PM

You don't often get email from dorte@sonic.net. [Learn why this is important](#)

I am writing to express my opposition to the new development that is being considered at 825 Drake Ave. in Marin City.

I do not believe that this development will benefit the community. I have been a Mill Valley resident for over 50 years and am very familiar with Marin City.

This is a high fire area with only one way in/out. The main intersection at the beginning of Marin City floods often during rains and high tide making it impossible for residents to get in/out.

This development is only planning to include 23 parking spaces for 74 units! The lack of parking is outrageous. And just too big for the parcel. Marin City is already extremely densely populated and this development would not be affordable to the current residents.

The residents have not been sufficiently involved in the planning process, you aren't listening to what they need! We DO NOT want this project.

STOP THIS PROJECT.

Sincerely,
Dorte Bot
343 Robin Road
Mill Valley, CA 94941

From: [Dr. Edward J. Hyman](#)
To: [FederalGrants](#)
Subject: New Marin City Project
Date: Sunday, April 23, 2023 11:44:30 AM

You don't often get email from psychologyexpert@hotmail.com. [Learn why this is important](#)

We thoroughly oppose the proposed 74 unit building in Marin City.

Dr. Edward J. Hyman

Dr Deborah A McDoanld

From: [ELIZABETH SMALLEY](#)
To: [FederalGrants](#)
Subject: Objection funding and no impact to 825 Drake proposal in Marin City
Date: Thursday, April 20, 2023 4:20:00 PM

You don't often get email from emsmarin1@comcast.net. [Learn why this is important](#)

I am writing to object to the notice of finding of no significant impact and notice of intent to release of funds for the project at 825 Drake in Marin City.

This project will have significant impact on Marin City which already has infrastructure issues evidenced in the plumbing problems that exist in Golden Gate Village today.

It is interesting that a private person who has wanted to develop an area of land on the ridge has repeatedly been turn down because of infrastructure issues and now 825 Drake is okay for funding?

45% of Marin City is already affordable housing which is 300% of the required amount of affordable housing. It's time for other cities, towns and unincorporated areas to get to the minimum requirement of 15%.

This is a high fire zone, with only one way in and one way out of the community.

Traffic and parking are already difficult and this proposal calls for 74 units with 23 parking spaces which is parking for 1/3rd of the units. If we assume 2 cars per household that is just 15% of the households in this development will have parking.

With so many cars already on the street this will create more congestion and a safety situation for emergency vehicles who will have difficulty providing services quickly.

The increased parking will all be in the area of the public safety building making this very dangerous for the community.

We have met our obligations here in Marin City for affordable housing. Give the money to a community that is struggling to get to the 15% as there are plenty of them in the county and overlook impacts to those communities. Don't add to those impacts in Marin City.

Elizabeth Smalley
59 Terrace Drive
Marin City, CA 94965

From: [Eos Mahassine](#)
To: [FederalGrants](#)
Cc: [Barb Killey](#); [Mickey Allison](#)
Subject: Extend 825 Drake comment period - Inability and/or extreme difficulty accessing County docs
Date: Friday, April 21, 2023 4:28:31 PM

You don't often get email from eosmahassine@icloud.com. [Learn why this is important](#)

I am writing to request an **immediate** grant of extension of the comment period to 30 days based upon

1. Inability and/or extreme difficulty accessing County docs referenced in EA.
2. The HUD regulations governing the extension. Specifically, 24 CFR Part 58, Subpart E, Sec. 58.46(a) which states "The responsible entity **must** make the FONSI available for public comments for 30 days before the recipient files the RROF when:
(a) There is a considerable interest or controversy concerning the project

If this extension is not granted today, it will be moot, as all the work required to respond to HUD and the County will need to be done by Monday, and it will appear that the County is intentionally trying to prevent the public from responding knowledgeably.

1. None of the documents to which there are links in the County's 92 page Environmental Assessment are available to the public, as they all go to the log-in screen for the HEROS system, to which the general public does not have access.

I do not assume that the County is intentionally trying to hide their supporting documents, and I but, I think a reasonable person would agree that the County providing links that require access to the HEROS system and then providing access in only in a very cumbersome way is a significant obstacle to the public's ability to make comments prior to Monday's deadline with sufficient knowledge of the grounds on which the County is drawing their conclusions and basing their decisions.

2. Additionally, the HUD regulations to which the County directs us in the Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds require the extension to 30 days of comment if there is considerable interest or controversy concerning the project

There is obviously considerable interest and controversy regarding this project and the issues that already cause Marin City residents to have 20 years lower life expectancy than their neighbors in Sausalito and Mill Valley, both less than 1 mile away.

In addition to any written comments you have received, the number of emails to Supervisors, number of Objections raised and comments made at BOS meetings all indicate both high levels of interest and controversy.

Please do this now, and we will try to work within the cumbersome way of accessing documents in order to learn exactly on what grounds the County's EA was based and

its conclusions reached.

Yours truly,
Eos Mahassine
415-550-7195
Gordon Smith Trust Manager
Mill Valley

Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has.

- Margaret Mead

From: [Erin Skiffer](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave Marin City
Date: Monday, April 24, 2023 12:22:36 PM

You don't often get email from erinskiffer@b2bpsychotherapy.com. [Learn why this is important](#)

Hello,

I am writing as a resident and homeowner in the Marin City neighborhood to state my objections to the Notice of intent to Request for Release of Funds for the Marin City proposed development on 825 Drake Avenue. I am happy to discuss my objections further.

I live at 33 Terrace Dr., Marin City
My cell is 415.302.6228

Best,

Erin Skiffer, PsyD (she/her)
Co-Director & Clinical Psychologist
Bridge to Bridge Psychotherapy Group
Phone & Text: 415.870.1425
Email: erinskiffer@b2bpsychotherapy.com
Website: b2bpsychotherapy.com

Marin County Office
21 Tamal Vista Blvd, Suite 162
Corte Madera, CA 94925

San Francisco Office
2481 Clay St.
San Francisco, CA 94115

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If you are experiencing a psychiatric emergency or need immediate assistance, please call 911 or go to your nearest emergency room.

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From: [felecia.gaston](#)
To: [FederalGrants](#)
Subject: Fw: Urgent - Demand for immediate addition 15 days of public comment
Date: Saturday, April 22, 2023 3:55:18 AM

I am writing to object to the denial of an extension for 30 days for public comment and to add my voice to the request for the extension and that the additional time be granted today, as, otherwise the entire objection response is due on Mon. the 24th.

It is my understanding that that, by the law governing the environmental review process, the County **must** extend the time to 30 days if there is considerable interest or controversy about the project. Considering the level of interest and controversy indicated by numerous objections made in writing to the Board of Supervisors, the comments made at the past 2 Board of Supervisor's meetings, and the developer's own bigoted response to those comments, it is difficult to understand what would be needed to demonstrate a high level of interest or indicate controversy. (If you spoke at either of the meetings or emailed a supervisor, please indicate that.)

Please extend the comment period to 30 days and do it today, as anything else would require the objections to HUD and the County to be submitted by Monday, and the extension would be moot.

Thank you for your consideration

Felecia Gaston
Marin City resident

From: [Irene Garcia](#)
To: [Sackett, Mary](#); +krice@marincounty.org; +drodoni@marincounty.org; +smoultonpeters@marincounty.org; +elucan@marincounty.org
Cc: [FederalGrants](#)
Subject: Stop the Development of 825 Drake Avenue
Date: Sunday, April 16, 2023 4:11:04 PM

Some people who received this message don't often get email from 31.irenegarcia@gmail.com. [Learn why this is important](#)

Dear Supervisors,

As a long-time Marin resident, I am reaching out in full support of the Marin City community, and the concerns that come with the proposal of 825 Drake Ave. This is a completely inappropriate project for Marin City which already includes far more than its existing fair share of high-density, affordable housing, and the County of Marin is placing an undue burden on Marin City without requiring other communities to absorb their fair share. This will only lead to further gentrification of Marin City!

Because Marin County has been slow to respond and has benefited from its own systems of oppression of marginalized communities, should not mean that families who have lived in Marin City for generations, be the ones to pay the price.

In Community,
Irene

From: [Jamie Whittington](#)
To: [BOS](#); [FederalGrants](#)
Subject: Opposition to 825 Drake/Opposition to Release of Funds for Project-Based Vouchers
Date: Monday, April 17, 2023 2:35:29 PM

Some people who received this message don't often get email from jwhitt182@gmail.com. [Learn why this is important](#)

Marin County has repeatedly demonstrated an eagerness to fulfill the county's Regional Housing Needs Allocation (RHNA) by doing everything in your power to enable a massive development at 825 Drake Ave. in Marin City, thus relieving more affluent areas of the county of the burden of unwanted construction. This despite Marin City already being the most densely constructed community in the county and **despite Marin City's current low-income housing totals being vastly underreported due to the omission of Golden Gate Village from the data you were given.**

A construction that is massively out-of-scale for the surrounding neighborhood, and that is **overwhelmingly opposed by the Marin City population**, currently seems cleared to proceed at 825 Drake Ave. under SB 35.

To repeat what has already been pointed out, many times:

- * Despite the Developer's obvious ignorance of Marin City, per his testimony at your BOS meeting of March 21, and his subsequent comments to the press, the site is on the **ONLY** road in and out of the residential area of Marin City, a narrow two lanes on a sharp curve with limited on-street parking. The ensuing traffic snarl will be untenable relative to pedestrian safety and fire and flood evacuation.
- * Traffic and pedestrian safety issues are exacerbated by the site being directly across the road from a public park which is a center of family life in Marin City (**a mistake in the site maps you were given, which show the park as vacant land**) and the fact that the site shares the only access road to the local school.
- * The site is in a flood zone.
- * The site is in a state designated high fire hazard zone.
- * The persistent inadequacy of Marin City's infrastructure (sewage, garbage, public transportation and mitigation of environmental hazards) has been a historic source of public concern.
- * The Sierra Club authored a scathing inditement of the environmental and safety impact of the proposed development.

Your eagerness to fulfill the Marin County RHNA by enabling this construction at 825 Drake puts you in the legally vulnerable position of enabling a disparate impact on a protected class. What can you do? **At this point one thing you can do is refuse to request the release of funds for the Project-Based Section 8 housing vouchers which are essential for this project to proceed.**

Thank You,

Jamie Whittington
182 Sn Carlos Ave
Sausalito CA 94965

From: [janet karel](#)
To: [Lucan, Eric](#)
Cc: [FederalGrants](#)
Subject: Cbc West Range v. AMG (compelling, possibly helpful re: 825 Drake Ave)
Date: Saturday, April 22, 2023 2:29:09 PM
Attachments: [Cbc West Range I, Llc v. Amg & Associates, Llc et al Cross MOTION for Summary Judgment Partial Summary Judgment Casetext.pdf](#)

You don't often get email from janet@catsdogsrock.com. [Learn why this is important](#)

Dear Mr. Lucan,

I am writing to you on behalf of what I have learned to date about the the proposed development at 825 Drake.and what I read in the Pacific Sun, “Shit Show” What I am attaching is a case text (PDF) and link to the text re: Cbc West Range, Llc v. Amg & Associates, Llc et al. It may be something pertinent, not sure about how this will go in it’s ultimate direction. I believe there is more as well to uncover and work with what I am not well-versed in but additional information that could prevent this project passing under the apparent status today. Yet...I was shocked when learning what I have and sending the following. Who to share this with, and so forth I am not sure. Just think there is more, and more matters right now for all of Marin.

825 was called to my attention due to volunteering in MC. I read, heard about it-- then went digging for information about this heated deal.

Have attached a case that rung a bell with respect to the statement from the pacific sun article “shit show” —

“another bone of contention was that the developer couldn’t answer some questions because he didn’t have a current financial statement.”

noted by you (from the pacific sun) expressing concern the available financial information on the project was nine months old.

And then followed with wanting to see updated financials, etc. to see whether the county a public entity should authorize the issuance of tax-empt bonds that will benefit a for-profit corp.

That read very loudly, because it makes a lot of sense, so sending the case in which AMG not only loses, but gives light of unscrupulous natures from the developer.

The updates and accuracy is essential information and a paragraph in the case if you read the attached PDF points to what is similar to the 825 Drake case-Alexis Kevorgian didn’t care about the case (CBC Properties vs AMG)

Why I made a strong connection and sending you this letter— Alexis K. didn’t care to know the numbers, financials in your 31/2 hour meeting because he had the Senate Bill 85 on his side in a big way. He didn’t do due diligence, why would he care? Because he doesn’t, and that doesn’t win fights like these but it does reflect in possibilities of a lot of legalities and long-term circumstances.

And to say regardless of anything but, his behavior from reading, he horrifically belittles and demeans individuals, human beings in an outrageous way, how that could be overlooked by

supervisors, is equivocal to overlooking what we see happening in front of us on a macro-government and business operations level. Referring to residents as George F. And Jim C. And communists is unimaginable and being in that room to witness and see it being gotten away with speaks volumes. For that and nothing else, but that's not realistic in today's life. He is a real-life Mr. Potter from A Wonderful Life. Probably not the first time that has been said.

Vouchers? What about 40 million bonus opportunity. This will go on and on, personal opinions, but for the reason that I am hoping will cause some kind of motion towards something to overturn this is the purpose of this letter. You can stop reading now if you haven't already...

Life altering this guy says for those people living there—yes, it could be life altering for those same people and many more if something such as a flood, fire or deaths related to the development occur and domino effects other parts of Marin. This has more than Marin City to look out for, and not because it's to just throw a building in there because laws support that and make it convenient. There are examples of larger construction and development projects throughout the country that totally bombed and incurred losses beyond. It's about playing the tape forward instead of just staying the course because it's less of a hassle - it reads like that to me.

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This is a poor showing from the Board, and the Attorney with respect to Marin County-Marin City- the whole of the whole. It read as if he was peering the yes vote. Wasn't there though.

It may be more effort to turn it around and have lots of detail and peddling closing the deal- but so worth it, it's just too easy the other way. This man has NO interest in anybody's lives, otherwise he would never speak like that and refer to this names.

Hoping a Win on the side of Something right does happen. All the best, Janet Karel.

janet@catsdogsrock.com/415-307-9029

https://casetext.com/brief/cbc-west-range-i-llc-v-amg-associates-llc-et-al_cross-motion-for-summary-judgment-partial-summary-judgment

From: janet_karel
To: senator.mcguire@sen.ca.gov; christopher.nielsoen@sen.ca.gov
Cc: [Lucan, Eric](#); [FederalGrants](#)
Subject: Fwd: Cbc West Range v. AMG (compelling, possibly helpful re: 825 Drake Ave)
Date: Saturday, April 22, 2023 3:18:50 PM
Attachments: [Cbc West Range I, Llc v. Amg & Associates, Llc et al Cross MOTION for Summary Judgment Partial Summary Judgment Casetext.pdf](#)

You don't often get email from janet@catsdogsrock.com. [Learn why this is important](#)

Dear Senator McGuire, Mr. Neilsoen,

Thank you in advance for reading, and reviewing the recent email I sent to Board of Supervisors, Mr. E. Lucan (cc'd Federal Grants)

I thought the more the merrier.

My apologies to all for length and typo/grammatical errors. The URL below works great. It's right here too https://casetext.com/brief/cbc-west-range-i-llc-v-amg-associates-llc-et-al_cross-motion-for-summary-judgment-partial-summary-judgment

Happy Earth Day!

With much appreciation,
Janet Karel

From: janet karel <janet@catsdogsrock.com>
Subject: Cbc West Range v. AMG (compelling, possibly helpful re: 825 Drake Ave)
Date: April 22, 2023 at 2:28:35 PM PDT
To: elucan@marincounty.org
Cc: federalgrants@marincounty.org

Dear Mr. Lucan,

I am writing to you on behalf of what I have learned to date about the the proposed development at 825 Drake and what I read in the Pacific Sun, "Shit Show" What I am attaching is a case text (PDF) and link to the text re: Cbc West Range, Llc v. Amg & Associates, Llc et al. It may be something pertinent, not sure about how this will go in it's ultimate direction. I believe there is more as well to uncover and work with what I am not well-versed in but additional information that could prevent this project passing under the apparent status today. Yet...I was shocked when learning what I have and sending the following. Who to share this with, and so forth I am not sure. Just think there is more, and more matters right now for all of Marin.

825 was called to my attention due to volunteering in MC. I read, heard about it-- then went digging for information about this heated deal.

Have attached a case that rung a bell with respect to the statement from the pacific

sun article “shit show” —

“another bone of contention was that the developer couldn’t answer some questions because he didn’t have a current financial statement.”

noted by you (from the pacific sun) expressing concern the available financial information on the project was nine months old.

And then followed with wanting to see updated financials, etc. to see whether the county a public entity should authorize the issuance of tax-empt bonds that will benefit a for-profit corp.

That read very loudly, because it makes a lot of sense, so sending the case in which AMG not only loses, but gives light of unscrupulous natures from the developer.

The updates and accuracy is essential information and a paragraph in the case if you read the attached PDF points to what is similar to the 825 Drake case-Alexis Kevorgian didn’t care about the case (CBC Properties vs AMG)

Why I made a strong connection and sending you this letter— Alexis K. didn’t care to know the numbers, financials in your 31/2 hour meeting because he had the Senate Bill 85 on his side in a big way. He didn’t do due diligence, why would he care? Because he doesn’t, and that doesn’t win fights like these but it does reflect in possibilities of a lot of legalities and long-term circumstances.

And to say regardless of anything but, his behavior from reading, he horrifically belittles and demeans individuals, human beings in an outrageous way, how that could be overlooked by supervisors, is equivocal to overlooking what we see happening in front of us on a macro-government and business operations level. Referring to residents as George F. And Jim C. And communists is unimaginable and being in that room to witness and see it being gotten away with speaks volumes. For that and nothing else, but that’s not realistic in today’s life. He is a real-life Mr. Potter from A Wonderful Life. Probably not the first time that has been said.

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https://casetext.com/brief/cbc-west-range-i-llc-v-amg-associates-llc-et-al_cross-motion-for-summary-judgment-partial-summary-judgment

From: [Jasmine Curtis](#)
To: [FederalGrants](#)
Subject: Stop The Proposed Development
Date: Monday, April 24, 2023 8:00:48 AM

You don't often get email from jasminecurtis6@gmail.com. [Learn why this is important](#)

Good Morning I am Jasmine Curtis

I currently live at 49 Cole Drive Apt. 1

Sausalito ca

In our neighborhood with 74 units of five stories high, 23 parking spaces I do object to this proposed development being built. This would truly be a nightmare situation for all the families that are already in this community, the one way in and one way out aspect, potential flooding, and more risk of high fire hazards. This has a lot more negative impacts then positive for this community.

From: [Jennifer Colin](#)
To: [FederalGrants](#)
Cc: [Moulton-Peters, Stephanie](#); [Lucan, Eric](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Sackett, Mary](#); hhall@marinhousing.org; scanson@marinhousing.org
Subject: Notice of Finding of No Significant Impact/ Notice of Intent to Release Funds
Date: Sunday, April 23, 2023 10:14:30 PM
Attachments: [20221123_070308.jpg](#)
[20221123_070414.jpg](#)
[20221123_070350.jpg](#)

You don't often get email from elevatorbabe@yahoo.com. [Learn why this is important](#)

To County of Marin;

I am writing in vehement protest to the 5-story monstrosity of a housing project that the Planning Board very quickly, and without notification or concern for any of the residents or ordinances of Marin City, passed for approval at the 1-acre lot of 825 Drake Avenue.

I live next door, at the Oak Knolls Cooperative, an owner-occupied complex consisting of 48 two-story units, on both sides of Drake Ave, and also at right angles on the side street of Buckelew. I have resided here for over 14 years, since August 2009.

****In re to Finding of No Significant Impact on Human Environment:**

Nothing is farther from the truth!!

We first learned of this project (which breaks EVERY environmental ordinance we have) 2.5 years ago in Nov, 2020, from a flyer (attached below) distributed by the Hannah Project, a non-profit youth organization currently residing on the 825 Drake Ave lot.

At that time, we all got on a Zoom meeting with the Planning Board, and to a single person voiced vehement opposition to this project, which would basically ruin our neighborhood and also our way of life as we know it.

For 2 years it was very quiet, and we thought that our voices and opposition had been heard. Unfortunately, they were not. Rather, the Planning Board and developer just became quiet, until about 4 weeks ago when we all came home to yet another flyer (attached) with architect's rendering of this 5 story monstrosity.

As part of the daily scope of my work as an Otis Elevator mechanic and trained first responder, I have personally witnessed and worked on housing project after housing project being erected--some reasonable and some not.

This one is definitely not!

I have rarely seen such blatant disregard of both environmental and community rights. I personally asked the Planning Board that day why they chose to inundate our already overloaded community of MC, still unfortunately riddled throughout with more than its fair share of such (plus an old and outdated sewer system & real fire hazard!) with yet more of same?

Asked why they did not try to build it next to their homes, schools, children? Of course, no comment from the Planning Board.

And so, after weeks of laborious research I discovered the CEQA Act, which is supposed to prevent just such atrocities from creation.. I am at present working with the Hannah Project in fighting this unethical affront to our Environment, not to mention the blatant systemic racism in hiding behind the phrase "ministerial"... as no family in Marin City will be able to afford to live there.

There are few more heinous acts than covering up avarice with such euphemism. We all, to a one, see through it!

I will try to be as concise as possible:

1) Oak Knolls Co-op (Marin City), where I live, has joined a battle to prevent a 5-story "low income" housing project that is slated to be placed literally right next to us, at 825 Drake Ave, Marin City, within the next few months.

The ENTIRE community of MC is up in arms at the outrageousness of this project. Basically, we learned about it 2 years ago in November, 2020, from a flyer (from the Hannah Project), with an architect's rendering of a 5-story monstrosity--which breaks literally every ordinance Marin City has against such:

- NO building over 2 stories;
- 41 units MAX on 1 acre;
- At least 2 parking spaces per unit;
- Prohibited développement of wildlife & bird sanctuary (which the lot is);
- Noise & traffic pollution;
- Sufficient open space law;
- **FIRE HAZARD,
- **FLOOD ZONE,
- ** Sewer already overloaded,
- ** 1 way in & out... to name a few!

** The developers, along with the Planning Board, using SB35, have circumvented these existing laws by labeling this horrific Project a "Ministerial Venture"...

Sounds good, but we, the community of Marin City (presently 38% African American, 38% Caucasian, + 22% mixed races), know differently.

They are misusing this expression purposely, to circumvent the laws which protect against such!

2 yrs ago this month, in Nov 2020, a community Zoom mtg was held with the Planning Board (who lightning-quick approved this Project before our community was even aware of, nor given a chance to, refute it); approx 200 residents (myself included) joined the discussion.

We were all, to a person, uniformly against it-- for many reasons:

1. Disproportionate #:

MC ALREADY has 614 "very low income" housing units, while the many other cities & townships of Marin have less than a dozen--0.

- *Belvedere
- *Tiburon
- *Mill Valley

- *Larkspur
- *Corte Madera
- *San Anselmo
- *Fairfax ..& more.

2. Logistics/Space/Fire Hazard:

Project drawing shows a 5-story huge building-- lot is barely big enough to accommodate. No open land, no tree canopy, would remain!!

Likewise the Oduduwa senior housing structure that already exists behind it, would have completely obliterated view-- by a giant building mere 6"away!

Also considerable fire hazard from buildings being so close to one another.

Our Fire Station across the street is also vehemently opposed to this project, for this very reason!!

3. Parking Nightmare:

74 units / 23 parking spaces!

There is supposed to be at least 2 parking spaces per unit. Most people these days have 2 cars, any overflow parks on the street, which is already overloaded, esp near Rocky Graham Park.

They are getting around this law bc there is another that states if a housing project is nearby to a "major metropolitan hub" , then the one space/unit does not have to be adhered to.

There is a "small" bus stop at the bottom of the hill, that serves Marin City. They are trying to label this as a "major metropolitan hub".

It is not!

4. Community Resistance:

Many, many of us got on the Zoom meeting 2 years ago and expressed outrage over over what is an example of the systemic racism that pervades--esp in Marin county. MC currently already has 614 "very low income" units, while other cities/townships here have little to none!

Put another way, "Keep the ghetto-rats corralled in the ghetto!" is how we feel.

On the zoom mtg 2 yrs ago, I expressed this-- with dozens of text comments popping up in support of my words as I spoke. I suggested they try to build this Project in Belvedere, Tiburon, even downtown Mill Valley or Larkspur, etc.

Of course, that would never fly bc those cities are inhabited by the ultra-wealthy, who have resources to fight.

5. Traffic:

Housing project will bring a traffic NIGHTMARE onto our street. 825 Drake lot (previous location of the Village Baptist Church-- 3 trailers--last 2 yrs resided in by the Hannah Project, is directly across the street from our new Rocky Graham Park.

Built only a few years ago as a sanctuary/ playground for local children, it boasts a small space of open air, play equipment, + a small theatre for plays or music.

Cars already drive too fast past this park, tho it shares a border w/ our little police/fire station. Our neighborhood is already filled with cars...

74 units/23 parking spots will initiate a traffic congestion of approx 125 extra vehicles, "forced" to park on our street!

6. Access:

Only 1 way in/out of the "fishbowl" of MC-- via the 101 underpass corridor. That many extra cars = that much worse congestion, which already exists.

Never mind in a State of Emergency!

7. Sewer issues:

MC already has an old, outdated sewer system. It cannot handle so many extra people!

With every rainstorm and also king tides, Marin City is literally flooded, trapping cars inside, because the outdated sewer system cannot handle the overflow.

A 74-unit Project will quite literally cause an environmental catastrophe of dynamic proportion!

8. Crime/theft:

I am forced to use a PO Box for mail due to (somewhat regular, esp holidays) individuals coming onto our property, prying open our mail boxes.

Busstop-- likewise bus riders are at times targeted--robbed/pickpocketed, sometimes even w/ physical assault! Again more common around holidays. Calling police after the fact does NOT achieve either recoupment of stolen property, nor apprehension of perps.

Unfortunately I know about this from both experience, and talking to other victims.

It's a terrible feeling.

9. Homicide:

Yes that's right, murders. In the 14 yrs I have resided at Oak Knolls, I have lived thru at least 4 murders--2 single and 1 double (double homicide fairly recent). All of them taking place at the "very low income" end of Drake Ave (immediately after passing thru 101 underpass)... All of them gang/drug related.

Unfortunately if one is looking for drugs/trouble, he or she can still find it here.

Of course I am not saying that everybody, or even most people who live in these places are doing this sort of thing. But enough of them are, that we see, hear, read, & witness, the crime, drug dealing, shots fired, theft (petty + grand), and yes, homicides.

Again, much of it seems to increase during holiday season.

10. Bird/wildlife sanctuary:

The 825 Drake lot has already been declared a bird & wildlife sanctuary! Plus Open Air sanctuary... a 5-story monstrosity taking up literally EVERY square inch of space will completely obliterate these--from 25% - 0% tree canopy.

And all the clean air these trees generate to our children!!

11. Sell Out:

Spoke with Betty Hodges, manager of the Hannah project. I'd known it sold in Nov, 2020 for \$2M; apparently, it was the pastor of the Village Baptist Church himself--an African American man who used to preach constantly about how much he cared about his community.

I have been told he made special provisions in the sale of the property that state only another church could be built.

Yet, this info is being suppressed.

Gevorgian the developer has stated "if we don't like it, go live somewhere else"..? He does not validate our very real concerns bc he only wants to make money, enjoy the 50-year tax exemptions for developing one of the VERY FEW tiny open spaces we have left here...

I would say same to him: Go build somewhere else!

** Of course, these individuals would NEVER allow a housing project such as this to be placed anywhere around, by, or next to "their" homes or children...

What then, makes them think forcing it on MC is ok??

Answer: Discrimination, bias, greed, unethical behavior.

That's what!

I speak for ALL our community..

I write to you at the behest (and gratitude) of ALL my neighbors.

A Protest Rally was held Sat, 10/29, at Rocky Graham Park, and recently we have obtained over 1370 signatures on a Petition to Oppose.

We ALL want to fight against this tyranny & unfairness.

We are ALL so very upset & distraught. The past 2.5 years has been riddled with both horror and anxiety, in apprehension to this nightmare.

The whole world is getting harder and harder to live in by the day. However, Marin City should NOT have to bear the brunt of the homeless issue, of overloading, of discompassion, of uncaring about its needs... yet AGAIN.

Again- this venture was NOT INTENDED for here, but other areas of Marin which are and have been, historically DEFICIENT in such!

Again-- would you put this next to "you"..? How would you feel, if this was happening to YOU?

This project is SIMPLY WRONG on every level!!

With sincerity,
Jennifer Colin
713 Drake Ave
Marin City
617-642-0870
Otis Elevator mechanic

AMG & ASSOCIATES

825 DRAKE AVENUE (MULTI FAMILY HOUSING)

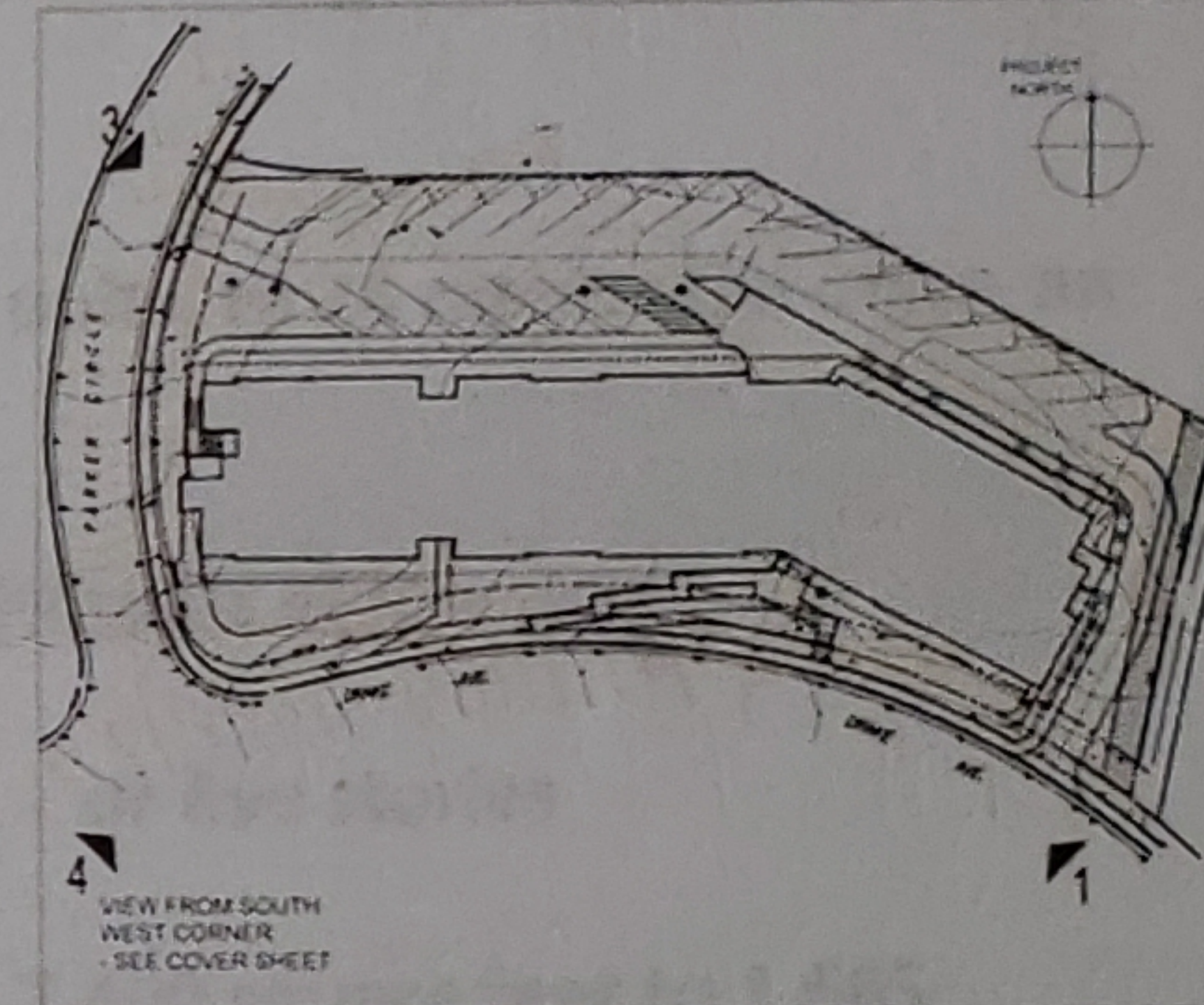
825 DRAKE AVENUE, MARIN CITY, CA 94965



1
VIEW FROM
SOUTH EAST
CORNER
DRAKE AVE



2
VIEW FROM
NORTH EAST
CORNER
ADJACENT
PROPERTY



4
VIEW FROM SOUTH
WEST CORNER
SEE COVER SHEET

3
VIEW FROM
NORTH WEST
CORNER
PARKER CIR



On November 30, 2020, the Marin County Planning Department approved a 74-unit housing development that will be built on the old Village Baptist Church property. The development will be comprised of 24 one bedroom, 42 two bedroom, and 8 three bedroom units that are slated to be affordable to very low and low income households. The plan was approved under California Senate Bill 35 ("SB35") which created a streamlined and ministerial approval process for certain housing projects in

SAVE OUR CITY



74 unit/23 parking space, 5 story housing complex.
PROJECT DEMOLITION AND CONSTRUCTION BEGINS SOON.
Traffic, noise, safety, parking, flooding and fire threat issues.
Marin City deserves better.

JOIN US **NOON - SAT OCT 29th** FOR A

March STARTING @
825 DRAKE AVE

ENDING @ **WITH A Rally**
Rocky Graham Park

850 DRAKE AVE, MARIN CITY, CA 94965

Demonstration Organizers:

The Hannah Project - Marin City CSD - Hope Housing - Play Marin - Oak Knolls Co-op -
Ponderosa Co-op - Women Helping All People - Marin City Climate Resilience + Health Justice
First Missionary Baptist Church - Golden Gate Village Resident Council
And Other Community Members

WHAT ISSUES ARE YOU MOST CONCERNED ABOUT WITH THIS PROJECT?

1. AESTHETICS

Project will have a substantial adverse effect on a scenic vista?

Project will substantially damage scenic resources, including, but not limited to, trees and buildings

Other: Please Describe Bldg is much too high - 5 stories? Destroying the beauty of our surroundings, the residents behind, & also destroy the natural hillside.

2. TRAFFIC

Project will create congestion in the area

Project will create safety hazard for pedestrian walking to school, going to park (lack of cross walks)

Other: Please Describe At present we have a nice wide open street. This project is ludicrous - 24 spaces for 74 units? Approx 2 cars/unit = 150+ additional cars!

3. INCONSISTENCY WITH THE COMMUNITY PLAN

Project will cause a significant environmental impact due to a conflict with any land use plan or regulation adopted for the purpose of avoiding or mitigating an environmental effect

Other: Please Describe We have ordinances in place to preserve our environment; open spaces, 2-story dwellings, etc. Not fair to try & squeeze a 5-story bldg in such a tiny space. We want to keep our environment peaceful, & beautiful.

4. LAND USE AND PLANNING

Scale and scope of project incompatible with surrounding area (Project footprint)

Density of project in relationship to surrounding project

Impaction: Marin City bearing the brunt of the county's affordable housing obligations

Other: Please Describe

Marin City is ALWAYS the target of projects like this. You need to put this one somewhere else..

5. Other, Please Describe

"Keep Low" income? Sorry but will WRECK our community. I still hear gunshots every so often at the other end of MC! Basically - you do not

Name _____ Address _____

Email _____

Signature _____

want this Project in your backyard. Why are you trying, then, to destroy our peace of mind? Hard enough as it is keeping ~~MC~~ MC safe. We watched it grow + evolve over the last decade; safe yes →

From: [Jennifer Conway](#)
To: [Moulton-Peters, Stephanie](#); [Lucan, Eric](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Sackett, Mary](#); [FederalGrants](#); [hhall@marinhousing.org](#); [scanson@marinhousing.org](#)
Cc: [felecia.gaston](#)
Subject: Re: Stop the Development of 825 Drake Avenue in Marin City
Date: Sunday, April 23, 2023 7:54:39 PM

Some people who received this message don't often get email from jenniferirwinconway@gmail.com. [Learn why this is important](#)

Dear County of Marin Community Development Agency and Board of Supervisors,

My name is Jennifer Conway and I live at 27 Buckelew Street in Marin City. Our family has lived in Marin City since 2005 and we absolutely love our special community.

I am writing to urge you to stop this completely inappropriate and dangerous development at 825 Drake Avenue in Marin City. There is indeed significant negative impact to the human environment:

- The environmental impact of these 74 units will be significant, further taxing our already fragile infrastructure
- We live in a flood and high fire danger zone with only one way in and out of our community that is barely sufficient for the residents we have today
- The traffic in that area is dangerous across from the Rocky Graham Park where families with small children cross the street and cars already drive too fast on blind curves
- It completely blocks the views from our local senior housing

Marin City cannot continue to bear the burden of all of the county's affordable and high density housing - we have more high density housing per buildable square foot than any other community in Marin as it is without adding this monstrosity of a development. Please reconsider any county support for this development - please revoke the 8 vouchers and any other political or financial support for this project. If it is going to happen it should be without one cent from our taxpayer monies and should trigger significant investment in the infrastructure in Marin City including addition of another route in and out of the community.

Thank you in advance for reconsidering your support!

Regards,
Jennifer Conway

From: [jennifer spinach](#)
To: [FederalGrants](#)
Subject: I am against this project
Date: Monday, April 24, 2023 2:25:01 PM

[You don't often get email from jennifer.spinach406@icloud.com. Learn why this is important at [There are so many thing wrong with thisnot enough parking ...one way in ...one way outlots of flooding in and out.....please listen to the people who live in Marin City.....thanks ,Jennifer Spinach](https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIF-g&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=cWBYFKNIul8ILdeq7Us4Dry3o7b5RQNIJMLYXaiDS2I&s=5gOkFt9WLzZ7P-hqrITfCZ1kWeWQI-gMtYWmzA8oRE&e=]</p></div><div data-bbox=)

From: [Joyce Martha](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave., Marin City, CA
Date: Monday, April 24, 2023 8:22:22 AM

You don't often get email from joycemartha@gmail.com. [Learn why this is important](#)

Hello Grantors,

I understand a unit is funded by federal monies for housing at this site. I object to this for the following reasons:

My feedback as a resident in a neighboring city is the design of this area has created more hardship for those left to live in that area: Poor drainage, poor egress with traffic away from this enclave, disproportionate density without shared resources for recreation and respite.

In addition, with climate change and increased flooding and wildfire threats among earthquake risk for this area, the impact of this design for 74 units and 23 parking spaces would create a greater risk for evacuation there is an increased probability for multiple risks to this area.

The rush for housing does not serve safety and risk reduction for the population already here whose needs are already under-served.

Thank you for considering that developments need a reasonable checklist to address the safety of a specific area and addressing the knowledge bank of long-time residents. Not having this type of review and feedback may ADD more risk and undesirable consequences to a greater number of people already burdened with inequity.

Thank you,
Joyce Martha
205 Brabo Terr.
Mill Valley, CA 94941

From: [Juanita Collins](#)
To: [FederalGrants](#)
Subject: Objections to the Notice of Finding of No Significant Impact/ Notice of Intent to Release Funds
Date: Sunday, April 23, 2023 6:46:07 PM

You don't often get email from jmcollins8@yahoo.com. [Learn why this is important](#)

Juanita Collins

48 Terrace Drive

Marin City, CA 94965

April 21, 2023

RE: Objection to Findings of No Impact/Notice of Intent to Request Release of Funds

To Whom It May Concern:

I'm writing regarding the proposed development at 825 Drake Avenue in Marin City. As currently planned, this building is five stories high, with seventy-four units and twenty-three parking spaces. My purpose in writing is to request that the funds set to be released for this project be rescinded.

We acknowledge that there is a need for housing, and a building on a smaller scale and with sufficient parking would have been accepted with minimal objections. The overall feeling in the community is this project is being pushed here due to an overall disregard for the community and the perception that Marin City is second rate and nonconsequential. As Marin City is under the purview of the county, it is also easier to force the county agenda. Golden Gate Village and the senior complex on Park Circle comprise a small amount of the housing in Marin City. However, the misconception is that all of Marin City is low-income housing. That is incorrect. This project would never have been considered for Sausalito (which has next to no affordable housing) Mill Valley, or any other city or town in Marin County.

It is interesting to read in the report that this project is purported to have no effect on the human environment. That is not the case. The area where this construction is planned already has a number of apartments and there is limited street parking. There is no way one could expect that having a bus station a short distance away from the development

would be enough to limit parking to twenty-three spaces. It takes forever to go anywhere by bus, and the reality is that these families will have at least one car, if not two. I live in a planned development of townhouses that is surrounded by apartments. When these townhouses were constructed, there was adequate parking as each home had garages and the apartments had assigned parking. Now it is impossible for two cars to drive down the street at the same time as people use their garages for storage and the street for extra cars. I cite this example because this is what occurred after the developer made what they thought were adequate provisions for parking. Knowingly constructing an apartment building of this size without an adequate provision for parking will only lead to chaos, dissension and a hazardous environment for residents.

I've heard the excuse that due to the Senate bill there is little that can be done. This is not true. Action and change depend on the perception and motivation of those who see there is a problem. Laws may be inflexible, but we often look at the spirit of the law when determining whether it fits the current situation. It is not possible to achieve something that is for the greater good while causing harm to others to achieve that goal. We want to be able to welcome our new neighbors and not view them as a problem.

Please vote to rescind the request for release of funds.

Sincerely,

Juanita M. Collins

From: [kristin](#)
To: [Sackett, Mary](#)
Cc: [FederalGrants](#)
Subject: 825 Drake Development
Date: Friday, April 21, 2023 3:48:05 PM

Some people who received this message don't often get email from spiritledkris@gmail.com. [Learn why this is important](#)

Dear Ms. Sackett,

I'm writing to let you know of my opposition to the proposed 74 unit/23 parking space 825 Drake Development. With only one way in and one way out of Marin City, this development is too big, too dense, disrupts the character of Marin City, and the Marin City residents have been solidly opposed to this since its inception. It is high time that Marin County listen to and respect the wishes of Marin City residents. The developer is misusing SB 35, which was intended to be used for streamlining affordable housing in areas that would otherwise oppose it, not force it on Marin City, a community that has more than its fair share of affordable housing. Please hear my plea and the pleas of many others, and oppose this development.

Sincerely,
Kristin Andersen

From: [Kyle Hara](#)
To: [FederalGrants](#)
Subject: Objections To The Notice Of Finding Of No Significant Impact & Notice Of Intent To Request Release Of Funds for the Drake Housing Project in Marin City
Date: Friday, April 21, 2023 9:04:57 AM

You don't often get email from kyleahara@gmail.com. [Learn why this is important](#)

Dear Planning Department,

I am writing to you today to express my deep concern and opposition to the proposed affordable housing project in our community. While I strongly support the need for affordable housing and the goal of expanding access to safe and affordable housing for all members of our community, I believe that the proposed project is deeply flawed and will ultimately do more harm than good.

First and foremost, the proposed site for this affordable housing project is already in an area with the highest population density in our community. Adding more residents to this already over-developed area will only exacerbate the existing challenges facing our community, including traffic congestion, overcrowding, and a lack of access to basic services and amenities.

Moreover, I am deeply concerned that the proposed project shows no consideration for the historical social injustice of our community. The area in question has long been subject to neglect and disinvestment, and the proposed project does little to address this underlying issue. Instead, it simply adds more density and congestion to an already stressed community.

I urge you to consider the long-term impact of this proposed project and to take a more thoughtful and inclusive approach to affordable housing development in our community. There are many other areas that could benefit from increased investment and affordable housing development, and I believe that we must take a more strategic and holistic approach to address the issue of housing affordability in our community.

In conclusion, I implore you to reconsider the proposed affordable housing project and to work with community stakeholders to identify a more suitable location for this critical need. Our community deserves better than a poorly planned and over-developed project that will only exacerbate existing challenges and do little to address the underlying issues of social injustice and inequality.

Thank you for your time and attention to this critical issue.

Sincerely,

Kyle Hara

718 Drake Ave

Marin City, CA 94965

From: [Leon Silverman](#)
To: [FederalGrants](#)
Subject: 825 Drake Avenue, Marin City Proposed Development
Date: Friday, April 21, 2023 10:49:52 AM

You don't often get email from leonsilverman@yahoo.com. [Learn why this is important](#)

Dear Sirs/ Madams,

This is to express my extreme disapproval of the SCALE of the proposed development adjacent to my home (733 Drake Avenue).

I acknowledge the need throughout Marin County to add affordable housing, but strongly believe it should be kept to the scale of neighboring properties and density considerations. 74 units with only 23 parking spaces is an absurd ratio and will lead to extreme street congestion.

I suggest the property be scaled back to no more than 3 stories, perhaps approximating 44 units. Even this would be a challenge, but believe it would be a fair compromise.

I greatly appreciate your consideration of the needs of our community, while fulfilling your housing mandates -

Sincerely,

Leon Silverman

From: [Leslie Allen](#)
To: [FederalGrants](#); [Moulton-Peters, Stephanie](#); [Lucan, Eric](#); krice@marincounty.org; [Rodoni, Dennis](#); [Sackett, Mary](#); hhall@marinhousing.org; scanson@marinhousing.org
Cc: [Washington, Brian](#); [Jordan, Jamillah](#); [Hymel, Matthew](#); lisabpolitics@gmail.com
Subject: 825 Drake Avenue Proposed Housing Project
Date: Monday, April 24, 2023 3:56:42 PM

You don't often get email from leslieallen@sonic.net. [Learn why this is important](#)

Dear County of Marin Supervisors and Others,

I live ONE block from the proposed housing project at 825 Drake Avenue in Marin City. I am both intimately aware of the neighborhood, community, and both physical and social context. I am also a retired architect with housing design experience, including the essential community involvement process.

The current scale and form of this proposed housing project is irresponsible, even without regard to the well-established hazards of this location due to emergency access and egress, immediate open space fire hazards, and inadequate and very old infrastructure.

The 825 Drake site location could be appropriate for a much smaller project, with a minimum of one parking space per unit, IF significant improvements could be made to infrastructure as well as overall design. A monolithic, 5-story wall of housing serves only the bank account of the appallingly abusive developer.

This project needs to go Back To The Drawing Board, and it needs to involve the community in planning it, in a genuine and committed way.

Leslie Allen, Retired Architect
PO Box 275, Sausalito, CA 94966

(415)380-9999 leslieallenart.com

From: [Katie Hara](#)
To: [FederalGrants](#)
Subject: Objections To The Notice Of Finding and Notice Of Intent for Housing Project in Marin City
Date: Friday, April 21, 2023 9:21:42 AM

You don't often get email from harakatie@gmail.com. [Learn why this is important](#)

Dear Planning Department,

I am writing to you today with a deep sense of concern regarding the affordable housing project that you have proposed for Marin City. While I appreciate the need for affordable housing in our area, I strongly urge you to reconsider the current plan for this project, which is, in my opinion, overdeveloped and insensitive to the historical social injustices that Marin City has already faced.

We already have the highest population density, and adding more housing units will only exacerbate the existing overcrowding and strain on our local resources. Additionally, the proposed development is far too large and dense for the area, which will undoubtedly lead to traffic congestion, reduced air quality, and a general decrease in the quality of life for our community. Our community has already suffered from years of neglect and exploitation, and we cannot allow this project to further perpetuate these injustices. We need a thoughtful and sensitive approach that considers the needs of our community, both now and in the future.

I understand that providing affordable housing is a complex issue that requires careful consideration and planning. However, I implore you to prioritize the well-being and sustainability of our community in your decision-making process. This means taking into account the existing infrastructure, the historical context of the community, and the needs of our residents. We need a solution that is equitable, sustainable, and respectful of our community's history and needs. Thank you for your attention to this important matter.

Sincerely,

Leslie "Katie" Hara

718 Drake Ave

Marin City, CA 94965

From: [Megan Mac Lean](#)
To: [FederalGrants](#)
Subject: Proposed 74 units in Marin city
Date: Sunday, April 23, 2023 6:42:56 PM

[You don't often get email from meganannmaclean@gmail.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mlSJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

To whom it may concern:

I totally object to this proposal and find it discriminatory against this community. Please consider building elsewhere.

Margaret MacLean
415-279-7273

Sent from my iPhone

From: [Marguerite Moriarty](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave., Marin City Development Project
Date: Friday, April 21, 2023 2:17:43 PM

You don't often get email from margmoriarty@gmail.com. [Learn why this is important](#)

Federal Grants Marin County,

I am opposed to this project going forward. Seventy units and **23** parking spaces is a flawed design. The interview by Alexis Grevorian showed what a cold hearted man the developer is and has no understanding of the beautiful residents that live in Marin City. This property is on 1.01 Acres.

I am writing to object to the denial of an extension for 30 days for public comment and to add my voice to the request for the extension and that the additional time be granted today, as, otherwise the entire objection response is due on Mon. the 24th.

It is my understanding that, by the law governing the environmental review process, the County **must** extend the time to 30 days if there is considerable interest or controversy about the project. Considering the level of interest and controversy indicated by numerous objections made in writing to the Board of Supervisors, the comments made at the past 2 Board of Supervisor's meetings, and the developer's own bigoted response to those comments, it is difficult to understand what would be needed to demonstrate a high level of interest or indicate controversy.

Please extend the comment period to 30 days and do it today, as anything else would require the objections to HUD and the County to be submitted by Monday, and the extension would be moot.

Thank you for your consideration

Sincerely,

Marguerite Moriarty

Marguerite Moriarty
ICARE
(415) 264-1113
margmoriarty@gmail.com

From: [marilyn Long](#)
To: [FederalGrants](#)
Subject: Marin City
Date: Sunday, April 23, 2023 9:21:43 AM

[You don't often get email from marilynplong@mac.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIF-g&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYkISmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mISJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

STOP the development of 74 units on one acre with 23 parking spaces.
What are you people thinking? Totally inappropriate for Marin gov't to allow that and I don't even live in Marin City.
How can you sleep at night with such nonsense!!!!!!

From: [Mary Nahorniak](#)
To: [BOS](#)
Cc: [FederalGrants](#)
Subject: I support Marin City residents in opposing 825 Drake
Date: Monday, April 17, 2023 12:39:25 PM

Dear supervisors,

I urge you to listen to the residents of Marin City and do what you can (which is not nothing!) to oppose the development at 825 Drake. I understand the state requirements and the feeling that "your hands are tied," but I think this is an opportunity to show courage in standing up for these residents. I am in favor of more housing in Marin and you have heard from me for the past several years in support of these issues. But in this case, the development is being concentrated in a place where it doesn't belong -- it needs to be spread out around the county not "dumped on" Marin City. Residents there have already suffered so much from bad housing policy, going back decades.

Marin City is the most densely populated community in Marin County. It already has a preponderance of affordable housing. The County of Marin is placing an undue burden on Marin City without requiring other communities to absorb their fair share of affordable housing.

Additionally, as you know, this large apartment complex will create significant traffic congestion and therefore a safety hazard since there is only one way in and one way out of Marin City. The location is within a High Fire Severity Zone, and there is inadequate updated infrastructure (water and sewer) for these additional living units.

The developer is using a state law, SB 35, to build more units than would be otherwise allowed and to avoid local input into the development. However, SB 35 was intended to be used to streamline affordable housing development in communities that would otherwise not accept it – not foist it on a community that already has more than its share of affordable housing.

Thank you,
Mary Nahorniak
San Anselmo

From: [Michelle Mokalla](#)
To: [FederalGrants](#)
Cc: [Tony Morabito](#)
Subject: 825 Drake Development - Sausalito
Date: Sunday, April 23, 2023 9:09:43 AM

You don't often get email from michelle_mokalla@yahoo.com. [Learn why this is important](#)

Hello - my name is Michelle and my husband is Tony. I bought our condo in the Nevada Valley area of Sausalito in 2016 and ever since we've had water and sewage issues.

We are opposed to the construction of this "affordable low income" housing development because our area **cannot** handle more stress on our current water and sewage system, not to mention the fact that it's way too many units (5 stories - 74 units) with not enough parking (only 32 spaces) in a high fire zone that is prone to flooding with only one way in and out. Did this developer do his homework ???

I strongly believe this project would be better suited in an area like Marinwood. We're not opposed to building low income housing in Marin County and we understand the state is mandating it, but this project makes NO sense for tiny Sausalito.

The city of Sausalito has already lost so much tourist income due to the pandemic and increased crime. We also had to deal with a homeless encampment at Marinship Park that had to be moved because of fecal contamination so we clearly have a sewage issue in Sausalito that needs to be fixed before adding more stress to our water and sewage system.

Sausalito residents have been through enough! This SoCal builder is clearly taking advantage of state mandate to build more low income housing for his own personal profit and doesn't care about Sausalito or Marin City as a community.

Thank you,
Michelle Mokalla & Tony Morabito

From: [Mickey Allison](mailto:Mickey.Allison)
To: FederalGrants
Cc: senator.mcguire@senate.ca.gov; assemblymember.connolly@assembly.ca.gov
Subject: Please extend the FONSI period
Date: Friday, April 21, 2023 3:35:38 PM

[You don't often get email from mickall1@yahoo.com. Learn why this is important at [To Whom it may concern,](https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIF-g&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpnVfiiMM&r=Gwn-CCemEOYklSmkNtMI30P40CMV4q71luxQ9XZmcsA&m=PrLIUfbYy4-ccQ4t6cOq7dDe6TPrhmg90hQ7gbygF54&s=DopCNE42yFR2KTIKFXO8lpiuEJOarCw23P_j_Nx1RfY&e=]</p></div><div data-bbox=)

I cannot comprehend why the county has rejected the request to extend the 825 Drake FONSI response to HUD from both Marin City and Marin County residents who want to respond, and are struggling to do so.

I/we believe that the 825 Drake project is controversial, and of considerable interest to multiple allies of Marin City residents who think that it is the wrong project for Marin City.

I tried to access documents used, but like others have found they password protected. That seems unfair and does not live up to the Freedom of Information Act (FOIA) that is guaranteed.

The 15 day period is too short, for first a request and delivery of documents. Therefore, we're having to go to other sources, and blind to what was sent to HUD.

I am copying this to my State Representatives: Senator Mike McGuire and Assembly Member Damon Connolly

As a Sierra Club Marin Group Executive Committee Member, I researched and wrote the first draft of our letter and accompanying Exhibits to Marin Planning Commission re. 825 Drake. I worked directly with Judy Schriebman, recently deceased to edit and finish the letter, dated September 28, 2020.

Since then, I have joined forces with other allies of Marin City residents trying to overturn the 825 Drake AB 35 initiated project.

Currently Marin City Multifamily 5+ Housing Units = 878
632 low income housing Units:
Ponderosa Estates' 56 Units,
Village Oduduwa's 25 Units,
Doretha Mitchell Apartments' 30 Units,
Ridgeway Apartments' 296 Units, plus
254 moderate income housing units
Oak Knolls' 56 Units and
Summit at Sausalito's 198 Units

Multifamily 5+ Unit Housing total = 878 is 63.761% of Marin City's total housing.
Single family and 2-4 Unit housing total = 499 Units or 35.873% of Marin City's total housing = 1,377 Units

The above does not include Marin City Health's 24 low income housing units over their new health clinic at 200 Phillips, next to MLK Jr. Academy. Ground has been broken for this project.

If 825 Drake 74 unit complex, on 1.01 acres, is built, 5+ Multifamily housing will rise to 976 units or 66.169% of Marin City's total housing units will total = 1475

AB 35 should have exempted communities like Marin City.

I do not like lawsuits, have never been involved in one, but I will join with others to overturn the 825 Drake Project, that is way to large and not right for Marin City if you do not grant us a full 30 days to respond.

Mickey Allison
Issaquah Dock
Sausalito, CA

From: [Milena Fiore](#)
To: [FederalGrants](#); [Sackett, Mary](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Moulton-Peters, Stephanie](#); [Lucan, Eric](#); [hhall@marincounty.org](#); [scanson@marinhousing.org](#); [todd.r.greene@hud.gov](#)
Cc: [Washington, Brian](#); [Jordan, Jamillah](#); [Hymel, Matthew](#); [lisabpolitics@gmail.com](#)
Subject: NO to 825 Drake Avenue Housing Project
Date: Monday, April 24, 2023 1:23:59 PM

Some people who received this message don't often get email from milenafire1@gmail.com. [Learn why this is important](#)

Hello:

I strongly object to the development of 825 Drake Avenue, the 5-story housing project that will have 74 units on 1 acre, and only 24 parking spots. The project benefited from a streamlined approval process, and received an 80% density bonus, which added 33 units to the 41 units allowed under the county code. This number will be added to an already densely populated area of 143 multi-family and single family units in a two block perimeter.

825 Drake Avenue is in a state-designated high fire hazard zone. It is an area where the natural watershed flows have been blocked and therefore has created extreme flooding issues. There are current water system infrastructure (sewer, drinking water) issues in Marin City, and this site will further tax them.

There is only one road in and out of Marin City. This complex will severely undermine the safety of Marin City residents by causing more traffic congestion. The streets adjacent to the site are narrow, and would exponentially increase hazardous conditions during emergencies for ambulance or fire response.

I live one block parallel to Drake Avenue and there are ongoing safety issues of speeding cars down our very narrow street. Additionally, it has obviously not been planned well, as the project will add to the parking burden on our streets.

The biggest issue is that of racial justice. Marin City has the highest Black and Brown community in Marin County, which is the least integrated county in the San Francisco Bay Area. Marin City already has a large amount of affordable housing, and the County of Marin is placing an undue burden on Marin City without requiring other communities to absorb their fair share.

Throughout this process there has been a glaring lack of community inclusion, as the developer, Alexis Gevorgian, has completely failed to engage respectfully with the community. The developer's racist comments and attitude following 21 March 2023 Board of Supervisors Meeting are wrong, harmful and oppressive, and must be addressed.

Please reverse the incorrect Notice of No Significant Impact, and do not allow this project to move forward.

Thanks in advance for your reply,

Milena Fiore
42 Terrace Drive

Sausalito, CA 94965

--

It is, therefore, now more than ever, essential that we each accept our role in service to others, looking for no greater reward than the welfare of our neighbors and the betterment of our communities. -William Steding, PhD

From: [Monica Oriti](#)
To: [FederalGrants](#)
Subject: Fwd: STOP the proposed development at 825 Drake Avenue, Marin City
Date: Thursday, April 20, 2023 8:44:51 PM

You don't often get email from shebaderoxy@gmail.com. [Learn why this is important](#)

Begin forwarded message:

From: Monica Oriti <shebaderoxy@gmail.com>
Subject: Re: STOP the proposed development at 825 Drake Avenue, Marin City
Date: April 20, 2023 at 8:41:31 PM PDT
To: federalgrants@marincounty.org
Cc: smoultonpeters@marincounty.org, elucan@marincounty.org, krice@marincounty.org, drodoni@marincounty.org, msackett@marincity.org, hhall@marincounty.org, scanson@marincounty.org

On Apr 20, 2023, at 8:36 PM, Monica Oriti <shebaderoxy@gmail.com> wrote:

Please heed this everyone with power over said development,

I urge you to rescind the approval of construction of the monstrosity about to be inflicted upon the people of Marin City in the name of affordable housing. We already have the most dense concentration of affordable housing in the entirety of Marin County. It is blatantly racist to situate more in a predominantly African American community when there is so much land available in other areas of this overwhelmingly Caucasian county with virtually none of it providing homes for the less advantaged.

The impact of this development would be enormous, not only further stressing our already stressed infrastructure but causing traffic congestion to a city which has only one way out in the event of a wildfire, earthquake, flood or other disaster. It is a patent fallacy to proclaim that with public transportation nearby the population of these dwellings would not own cars. Most of the residents will have at least one car and possibly more. Adding 74 units with so many cars would doom many of the people of Marin City with no actual way to evacuate in the event of an emergency. There will be no escape for some if this development is permitted to proceed. The potential loss of life is criminal. It seems this development was planned here because minority lives are not counted as worthy of protection. It is a

failure of society to situate this development in Marin City and indicative of fundamentally appalling attitude toward the lives of the of primarily black Section 8 recipients it purports to be the basis of serving.

The development is across from the heavily used Rocky Graham Park which serves not only Marin City but nearby suburbs. Parking is already a problem in our neighborhood which would be severely exacerbated should this atrocity against the people of this area whose need for physical recreation, exercise and a playing field is vital to their health and well being.

There is no guarantee the 49 units above the 25 Section 8 units would even remain affordable in the future. It is nothing more than a land grab and it is ugly, robbing us of a green space overlooked by the charming Village Oduduwa, where 6 Section 8 units are currently going begging and where I am a lucky Section 8 resident, The developers would cut down a heritage redwood in the process.

To say there is no impact is simply a racist lie promulgated by those concerned only with protecting their own pristine communities. Please stop it if for no other reason that you all face being sued for discrimination if it proceeds.

Thank you for your attention to this urgent matter.

Mo Hill Esq, known as Monica M Oriti, 2 Park Circle #307, Marin City, California 94965.

You may reach me by email or at 216-280-3637

From: [Nancy Miller](#)
To: [FederalGrants](#)
Subject: 825 Drake
Date: Monday, April 17, 2023 12:47:04 PM

You don't often get email from nm249292@gmail.com. [Learn why this is important](#)

825 Drake, Marin City Inbox



Nancy Miller <nm249292@gmail.com>

12:31 PM (13 minutes ago)



to msackett, drodoni, Stephanie, krice, elucan, bcc: me



Dear Supervisors,

As Sen. Weiner, the author of SB 35, says himself in [SB 35's Fact Sheet](#), “...when local communities refuse to create enough housing — instead punting housing creation to other communities — then the State needs to ensure that all communities are equitably contributing to regional housing needs.” This bill was not intended to stuff more housing in dense neighborhoods, such as Marin City, that already have the most affordable housing in the county. The poorest neighborhood with the highest density of black residents? SB 35 is meant to get communities with little or no affordable housing to do their fair share. Burdening Marin City is Disparate Impact 101.

Sincerely,
Nancy Miller
The Redwoods, Mill Valley

From: [Nancy Peach](#)
To: [FederalGrants](#)
Subject: Fwd: Objections to the Notice of Finding of No Significant Impact in Marin City
Date: Monday, April 24, 2023 4:06:59 PM

You don't often get email from nancypeachartist@gmail.com. [Learn why this is important](#)

----- Forwarded message -----

From: Nancy Peach <nancypeachartist@gmail.com>
Date: Mon, Apr 24, 2023, 3:32 PM
Subject: Objections to the Notice of Finding of No Significant Impact in Marin City
To: <scanson@mainhousing.org>, <hhall@marinhousing.org>, msackett@marincounty.org
<msackett@marincounty.org>, <drodoni@marincounty.org>, <krice@marincounty.org>,
<elucan@manincounty.org>, <smoultonpeters@marincount.org>,
<federlgrants@marincounty.org>

Hello,

I object to the proposed development at 825 drake avenue, Marin city, due to the inadequate parking situation, one way in and one way out...too much traffic and negative impacts to Marin City.

I have lived at 3 Flemings Court for almost 30 years and have been living at 441 Drake Avenue prior to that for 6 years.

I have seen Marin City grow and it is not ok to build something like this in our neighborhood.

Our neighbors have enough of a headache with the inability to shop here due to the prices of Mollie Stones, etc.

This neighborhood needs to have all the parking spaces and the fact that you have not provided enough is proof enough that this is a bad idea.

I live at 3 Flemings Ct, Sausalito, CA 94965,
My name is Nancy Peach and my husband is Carl Turner
415 823-3458

Thank you,
Nancy Peach

From: [Pamela Ross](#)
To: [Sackett, Mary](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Moulton-Peters, Stephanie](#); [Lucan, Eric](#)
Cc: [FederalGrants](#)
Subject: Marin City affordable housing/825 Drake
Date: Sunday, April 16, 2023 4:40:35 PM

Some people who received this message don't often get email from rossgay108@gmail.com. [Learn why this is important](#)

Dear Supervisors,

Despite many years of supporting affordable housing in West Marin, which this community wants and is willing to support both politically and financially, I find myself writing to oppose the so-called affordable housing proposal at 825 Drake. This project is a travesty of what affordable housing should be, and is possible only because Marin County has failed to make real provision for real affordable housing elsewhere in the county. And how ironic that this terrible proposed development is in Marin City, an unincorporated area that already has a big share of the actual affordable housing in our wealthy county. Talk about segregation!

Shortly after stabbing the GGV Resident Council in the back regarding financing for the long-overdue renovations at GGV, the Board of Supervisors approved \$40 million in bonds for Gevorgian's rule-beater. Why can't Marin stop this ridiculous project? Because the county is subject to SB35, which is a developer's dream act, because we have not built enough affordable housing in this county to meet the requirements of the state bill. That's right—it's our past record on affordable housing that has put us in this box.

825 Drake has everything wrong: only 25 Section 8 project-based vouchers for 74 units, completely inadequate parking, in a high fire zone, a developer who has done exactly no community outreach, and who calls the opposition to the project "Communists...they just want free handouts."

How about approving \$40 million in bonds for the renovation of Golden Gate Village? Put your money where your mouth is, please.

Pamela Ross
Inverness

From: [Patricia Houden](#)
To: [FederalGrants](#)
Subject: OPPOSED 825 Drake Ave.
Date: Monday, April 24, 2023 12:02:20 AM

You don't often get email from phouden@me.com. [Learn why this is important](#)

RE: 825 Drake Ave. Proposal

I am in favor of building affordable housing, which is done with outstanding architectural and urban design, that takes the community where it is sited into consideration, and involves them cooperatively in planning.

The proposed project at 825 Drake Ave. **accomplishes none of these things**, and needs to go back to the drawing board. Do not exploit the most vulnerable population in Marin County to satisfy the requests of developers.

Pat Houden
Homeowner

P. Houden | phouden@mac.com | +1 415.286.0876

From: [Patrice Villars](#)
To: [Sackett, Mary](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Moulton-Peters, Stephanie](#); [Lucan, Eric](#)
Cc: [FederalGrants](#)
Subject: STOP the 825 development in Marin City
Date: Monday, April 17, 2023 12:38:12 PM

[Some people who received this message don't often get email from prvillars@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Marin needs affordable housing but NOT in an area that is already severely impacted with housing congestion. It seems very problematic to me that all of these 74 units (with 23 parking spaces!) is proposed in one of the parts of Marin with the highest number of Black and brown residents. The building in this area is not only impractical but appears to be imposed on people of color with little to no consideration of their lived experience. Build affordable housing in a predominantly white area, spread it out over the county.

Respectfully,
Patrice Villars
San Rafael resident

From: [Rebekah Helzel](#)
To: [FederalGrants](#)
Cc: [Moulton-Peters, Stephanie](#)
Subject: URGENT request for action
Date: Friday, April 21, 2023 3:11:29 PM
Attachments: [Marin Race Equity Action Plan February 2022 - UPDATED \(1\).pdf](#)

I am writing to request an **immediate** grant of extension of the comment period to 30 days based upon

1. Inability and/or extreme difficulty accessing County docs referenced in EA.
2. The HUD regulations governing the extension. Specifically, 24 CFR Part 58, Subpart E, Sec. 58.46(a) which states The responsible entity (County) **must** make the FONSI available for public comments for 30 days before the recipient files the RROF when: There is a considerable interest or controversy concerning the project.

If this extension is not granted today, it will be moot, as all the work required to respond to HUD and the County will need to be done by Monday, and it will appear that the County is intentionally trying to prevent the public from responding knowledgeably and is downright obstruction of due process and HUD's intention of granting appropriate time for comment and feedback.

As you don't listen to public comments, which in this case were based on facts and information that relates to the safety and welfare of the community, you would understand why this scale of project is such a big mistake. Most of us work this makes refusal to extend an obstructionist act which penalizes the community - i.e. disparate impact by not giving the time that HUD requires for a controversial project. If you are doing so because the developer has an expiring option on the property, well that makes it something more.

Attached is the County's Equity Action Plan. How is preventing the community the reasonable time to comment fit into the County Plan?

Rebekah Helzel
Mill Valley

County Note: The attachment referenced above is 70 pages. Here is a direct link to the County's Equity Action Plan: <https://www.docdroid.net/9TqcMKJ/marin-race-equity-action-plan-february-2022-updated-pdf>

From: [ROBERT HOLLINGSWORTH](#)
To: [FederalGrants](#); todd.r.greene@hud.gov
Cc: [Moulton-Peters, Stephanie](#); [Lucan, Eric](#); [Rice, Katie](#); [Rodoni, Dennis](#); [Sackett, Mary](#); hhall@marinhousing.org; scanson@marinhousing.org
Subject: 825 Drake Avenue Apartment Project in Marin City
Date: Monday, April 24, 2023 3:43:53 PM

You don't often get email from robert.hollingsworth@comcast.net. [Learn why this is important](#)

Subject: 825 Drake Avenue Apartment Project in Marin City

I apologize in advance for the formatting of this email; it was out of my control.

This submittal is regarding the Apartment Project proposed to be built at 825 Drake Avenue in Marin City. I only found out about this proposed project last week when I read an article about it in the local Pacific Sun newspaper, so have not had time to thoroughly research it.

However, there is one aspect of it that doesn't need much research to know it is unacceptable. The first sentence describing the project always starts out that it will have 74 units and 24 parking spaces. What's wrong with this picture! Marin City's population is so dense that parking is always a matter of concern to all residents here.

It is obvious prima facie that the ratio of 24 parking spaces to 74 units is way out of kilter and is unacceptable. I felt confident that there must be some kind of regulations on the books that would serve to prevent such a topsy-turvy 24 parking spaces to serve 74 units. And this indeed turned out to be the case. The minimum required parking spaces required is specified in Schedule 24.04.340-A in Chapter 21.04.340 of the Marin County Building Code, "Minimum Automobile and Bicycle Parking Standards for Residential Development."

The applicable portion of the Schedule for the Drake Avenue project is reproduced below:

Schedule 24.04.340-A: Minimum Automobile and Bicycle Parking Standards for Residential Development

Minimum Number of Parking Spaces ¹

Type of Residential Unit	Automobile Parking Requirements	Bicycle Parking Requirements
One-bedroom units	Base Standard: 1.25 spaces per unit, plus 1 guest space per 5 dwelling units Senior Citizen Housing: 0.5 spaces per unit,	If unit has private garage: 1 short-term space per 2 units. If unit does not have private garage: 1

	plus 1 guest space per 5 units Housing Overlay Designation: 0,75 spaces per unit	short-term space per 2 units and 1 long-term space per 3 units.
Two-bedroom units	Base Standard: 1.5 spaces per unit, plus 1 guest space per 5 dwelling units Senior Citizen Housing: 0.5 spaces per unit, plus 1 guest space per 5 units Housing Overlay Designation: 1 space per unit	If unit has private garage: 1 short-term space per 3 units. If unit does not have private garage: 1 short-term space per 3 units and 1 long-term space per unit.
Three + bedroom units	Base Standard: 2 spaces per unit, plus 1 guest space per 5 dwelling units Senior Citizen Housing: 0.5 spaces per unit, plus 1 guest space per 5 units	If unit has private garage: 1 short-term space per unit. If unit does not have private garage: 1 short-term space per unit and 1.5 long-term spaces per unit.

The apartment complex is scheduled to have

24 1-bedroom units, 42 2-bedroom units, and 8 3-bedroom units.

Per the Schedule 24.04.340-A above,

the Marin County Building Code specifies that

the 24 1-bed units have an allocation of 30 parking spaces + 5 more spaces for guests,

the 42 2-bedroom units allocate 63 parking spaces + 9 guest spaces,

and the 8 3-bedroom units require 16 spaces + 2 guest spaces,

for a total number of $35 + 72 + 18 = 125$ spaces being called for by the Code.

This is a far cry from the 24 total spaces the developer was apparently planning to provide per the Pacific Sun newspaper article. I suspect there must be some miscommunication involved here.

The potential Code violation that would be created if only 24 parking spaces were provided as part of the development is not mentioned or addressed in the April 7, 2023, letter from the Marin County Community Development Agency Housing and Federal Grants Division. How could this be overlooked!

The Marin County Building code contains a significant amount of supplemental information regarding the design requirements for the parking spaces, including the layout and dimensions of the parking areas. The following examples of these design requirements are from the Code:

(a) Access drives, aisles, passageways, and parking and internal circulation areas shall be illuminated with intensities of at least one-quarter of one foot-candle at the ground level during the hours of darkness. Motion detectors to restrict certain lighting to times of use may be approved if there is adequate safety and security lighting where needed.

(b) Energy efficient lighting (high pressure sodium fixtures) shall be used.

(c) Light bollards or similar low-level (less than ten feet in height) small-scale lighting fixtures should be used to provide a safe level of illumination for pedestrian walkways in or leading to parking areas. Their form, texture and color shall be compatible with the architectural character of the adjacent structures.

(d) Lighting fixtures shall be shielded so as not to produce obtrusive glare on the public right of way or adjoining properties. All luminaries shall meet the most recently adopted criteria of the Illuminating Society of North American (IESNA) for "full cut off" luminaries.

There are many other such parking space and parking lot specifications. Some of these are mentioned here to illustrate this:

24.04.335 – General Conditions

Off-street residential *parking*. All residential *parking* and loading *spaces* shall be provided on the same site as the use to which they relate.

Design of facilities. *Parking spaces* shall be located so as to create a reasonably convenient and safe relationship for pedestrians between those *spaces* and destination of users of the *spaces*.

Parking spaces shall be independently accessible such that a vehicle may enter or exit any *space* without the necessity of moving another vehicle (except for tandem *parking* conforming to the standards found in this chapter). In multi-family residential projects, *parking* shall be located on the side or behind buildings or below grade relative to the fronting street, except where small *parking* areas of fewer than six *spaces* are located between buildings and vehicles are screened from view, or where the *parking* is within street-facing garages that serve individual *units*.

No compact *parking spaces* shall be allowed in providing the number of *parking spaces* required by this chapter.

Except for detached single-family dwellings and duplexes, all off-street *parking* and loading *spaces* shall be striped and provided with concrete bumper guards or wheel stops. A six-inch high concrete curb surrounding a landscape area at least five feet wide may be used as a wheel stop, provided that a vehicle overhang will not damage or interfere with plant growth or its irrigation. A concrete sidewalk may be used as a wheel stop if the overhang will not reduce the walkway width to less than the minimum required.

For *multifamily* residential *parking* areas with more than fifteen vehicles *parking spaces* in total, at least fifty percent of the interior of the *parking* areas, excluding perimeter landscaping, shall be shaded by either a shade structure of light-colored materials with a Solar Reflectance Index of at least twenty-nine, a shade structure with solar panels, or by trees. If shade is provided by trees, the amount of required shading is to be reached within fifteen years for the tree type.

24.04.350 - Parking bays.

Parking bays shall not be allowed on roads which are or are proposed to be county-maintained roads.

24.04.360 - Provisions relating to designated accessible parking.

Designated accessible parking and related facilities shall be provided in accordance with federal and state requirements.

24.04.400 - Slopes.

The maximum cross-slope or grade of a parking area should not be more than five percent and shall not be more than eight percent [sic]. Parking stalls should slope towards the curb or wheel stop.

24.04.410 - Parking lot lighting.

All open residential parking areas designed to accommodate ten or more vehicles shall be provided with exterior lighting in accordance with other titles of this code that generally meets the following standards:

24.04.380 - Dimensional standards.

Head-in parking spaces shall be a minimum eight and one-half feet by eighteen feet. Parallel spaces shall be a minimum eight feet by twenty feet.

Another item that may have an impact on potential parking space-associated requirements may result from any CALGreen requirements adopted by Marin County associated with Electric Vehicle charging stations. If so, this could have an impact of the availability parking spaces and the technical requirements associated with installing the chargers. Any requirements resulting from the transition to EVs should be reviewed carefully for any impact on the project's design requirements. For more information on the County's Green Building requirements, please visit www.marinegreenbuilding.org

CalGreen Mandatory Measures

CalGreen Mandatory Measures are a requirement of the California Green Building Standards Code. These mandatory measures are required on all new homes and residences. Furthermore, they also apply to additions and alterations which increase the building's conditioned area, interior volume, or size.

The type of buildings required to comply with the CalGreen residential mandatory measures include:

- One and two-family dwellings, townhouses, and factory- built housing.
- Accessory Dwelling Units (ADU's)
- Hotels, motels, lodging houses
- Apartment houses and condominiums
- Dormitories, shelters, employee housing
- Other types of dwellings containing sleeping accommodations

Note that the requirements apply not only to single and multi-family homes,.

Conclusion:

With the pressure to construct affordable housing all over the state, including Marin County, care needs to be taken to we don't, in our haste, inadvertently violate any of the Building Code requirements. Those codes were developed and incorporated into regulations to help insure the safety and welfare of the County residents. Allowing any code violations to creep into the project, even involving as mundane a subject as parking spaces. opens the developer and the County to law suits. In this case, having sufficient parking for the residents protects not just the safety and welfare of the residents, but also their sanity. Thank you for your consideration of the contents of this letter.

Regards, Robert Hollingsworth

robert.hollingsworth@comcast.net

26 Dutton Court

Marin City, CA 94965

From: [Kong, David - BLS](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave
Date: Friday, April 21, 2023 5:42:19 PM

You don't often get email from kong.david@bls.gov. [Learn why this is important](#)

No on 74 units at 825 Drake Ave

Ronald Kong
23 Terrace Drive
Main City CA 94965

From: samuelsotosuver@yahoo.com
To: [FederalGrants](#)
Subject: Opposition to Release of Funds for 825 Drake Ave Project
Date: Sunday, April 23, 2023 9:46:52 PM

You don't often get email from samuelsotosuver@yahoo.com. [Learn why this is important](#)

Hello,

I am opposed to the release of funds for the 825 Drake Ave Project (APN) 052-112-03, and object to the finding of no significant impact.

The County of Marin's declaration of no significant impact on the human environment is not justifiable. One of the areas that should be evaluated is the potential impact on adjacent properties, including the reduction of natural light due to shading. This needs to be identified as a problem, and mitigated. It is obvious that a 5 story building will totally block the sun from the Oduduwa Senior Housing apartments, for many months of the year.

Of course the EIR process requires consultation with stakeholders, including Oduduwa residents and the developer must provide information about the impact of the sunlight reduction and get feedback for mitigation. This was not done.

Since County of Marin did not fulfill their obligation of due diligence for the significant impact of sunlight blockage to senior residents (the Attorney General focuses on the need to address impacts on the most vulnerable residents including the elderly) I object to release of funds until these problems can be addressed.

In addition, since significant parking is not provided by the developer, this affects the community, as the street cannot take the additional parking. This restrict access to an important park across the street that has no dedicated parking.

Also concerning, is the impact on the heritage redwood tree on the property and nesting birds.

In addition, in the event of an emergency, egress out of Marin City becomes dangerously congested due to only one road out. With a significant increase in population due to a 74 unit building, this would make a dangerous situation much worse.

For the above reasons the finding of no significant finding should be rescinded and the release of funds stopped.

Sincerely,

Sam Soto-Suver
Resident of 706 Drake Ave., Marin City, CA 94965

Bowerbird Photography

Samuel + Ariel Soto-Suver
www.bowerbirdphotography.com
tel: 415.312.8545

Global + Social Impact Photography: <http://www.arielandsam.com>
Top Bay Area Wedding Venues & Vendors: <http://www.topbayareaweddingvenuesandvendors.com>

Read our reviews on [Yelp](#)
Follow us on [Instagram](#) and [Facebook](#)

From: [Sandra Mausner](#)
To: drodoni@marincounty.gov
Subject: 825 Drake
Date: Monday, April 17, 2023 11:42:51 AM

You don't often get email from sandra.mausner@gmail.com. [Learn why this is important](#)

Dear Sir:

As my representative on the Marin County Board of Supervisors, I am writing to strongly urge you to **stop any approvals for the 825 Drake Ave development project in MarinCity.**

I am particularly concerned about building in a **high fire hazard zone and the lack of adequate parking.**

These are certainly critical issues for Marin County.

This is a vote for reasonableness. I hope I can count on you.

Best,
[Sandra Mausner](#)
Sandra Mausner Consulting
Corte Madera, California
[415-686-2075](tel:415-686-2075)

From: [Scott S](#)
To: [FederalGrants](#)
Subject: 825 Drake is a disaster and needs to be stopped
Date: Monday, April 24, 2023 7:48:25 AM

You don't often get email from scottshaps@gmail.com. [Learn why this is important](#)

How could your organization possibly see no issues with the planned development at 825 Drake? How could this project be approved?

1. Marin City is already high density with limited resources.
2. There is only one entrance to this already high density area.
3. This is a classified high wild-fire risk area
4. There is a significant flood risk with no way out or access to services
5. No/minimal parking is being provided (the alternatives are a joke) causing sever congestion on already overcrowded local roads.

Mill Valley, Corte Madera, Larkspur, Greenbrae, and the rest of Southern Marin have much better locations ,plenty of services, plenty of available land, no fire risk, and multiple access points -so why is this being forced on the already disadvantaged citizens of Marin City?? Is it a demographic issue? Isn't that the point of SB35 - to give greater access to those in need, not to cram more suffering together?

825 Drake is an unsafe disaster that will destroy property values in Marin City - will the rest of the county who benefit, while Marin City suffers, be providing proper compensation to those hurt by this project and put in danger? Will the county pay for a second road access point through Mill Valley to protect the residents of Marin City?

This project will be a disaster that puts people at risk, and its approval to proceed is extremely dubious and should be revoked.

I am certainly available for any followup questions or comments.

Regards,
~ Scott Shapiro
Marin City resident

From: [Shari Hansen](#)
To: [FederalGrants](#)
Subject: Proposed Development at 825 Drake Ave, Marin City
Date: Sunday, April 23, 2023 8:45:19 PM

[You don't often get email from sydanese@yahoo.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIF-g&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYkISmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mISJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

To whom it may concern:

We are writing to say that we oppose the development of this 5-story housing project. We understand that more affordable housing is needed in Marin County but this project seems both socially and environmentally irresponsible. This entire project seems to not have taken the concerns of the community into consideration. There are real faults with this project - the extreme density of housing, the lack of enough parking, the high cost of the monthly "affordable" rent, the flooding of the one road in and out of the area, the fire hazard designation zone, etc.

All in all, we are completely against this project.

Sincerely,
Shari and Bjarne Hansen
Residents of Sausalito

From: [Shirin Amir-Alikhani](#)
To: [FederalGrants](#)
Subject: Opposing the 74 unit housing
Date: Sunday, April 23, 2023 5:40:54 PM

[You don't often get email from shirinalikhani@mac.com. Learn why this is important at https://urldefense.proofpoint.com/v2/url?u=https-3A__aka.ms_LearnAboutSenderIdentification&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=Gwn-CCemEOYkISmkNtMI30P40CMV4q71luxQ9XZmcsA&m=tVXTG-mlSJxKi6QBVu_nq8C_7WQm7lnFr74mc8bBnXU&s=bUcpSNWYgJltojPfyIVI_nfuGgPFAnGZmofdSr7n1Xw&e=]

Hi,

My name is Shirin Amir-Alikhani and I am a Sausalito resident. I oppose the hideous 74 unit housing proposal on Darke Ave in Marin City. We're a small community who needs more housing AND appropriate parking. This looks more like a jail and not adequate parking for the number of units built.

Please consider an overhaul of its design and the number of allocated parking.

Best,
Shirin Ami-Alikhani
2 Platt Ave.,
Sausalito, CA 94965

Sent from my iPhone

From: [Susan Shea](#)
To: [FederalGrants](#)
Cc: [Barb](#); [Susan Shea](#)
Subject: FONSI comments extension
Date: Friday, April 21, 2023 2:51:33 PM

You don't often get email from sshea123@outlook.com. [Learn why this is important](#)

Hello,

I have been assisting in responding to the Environmental Assessment for the proposed development at 825 Drake Avenue, Marin City. Please grant an extension for the community to respond the county's surprising lack of understanding about its impact.

I have not been able to access the documents that the County of Marin used to make their determinations of significance of this project on Marin City's human environment.

Also, I have attended many forums on this project that have demonstrated that this is a very controversial issue.

PLEASE allow the community more time to access the documents used by the county to determine that this project will no have a significant impact. The community comments at the Board of Supervisor's hearing alone on the bond issue should be enough to grant an extension.

From: [Toni Wittenmeier](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave., Marin City Development Project
Date: Saturday, April 22, 2023 6:53:02 PM

You don't often get email from toniwitt2@yahoo.com. [Learn why this is important](#)

Federal Grants Marin County,

I am opposed to this project going forward. Seventy units and **23** parking spaces is a flawed design. The interview by Alexis Grevorian showed what a cold hearted man the developer is and has no understanding of the beautiful residents that live in Marin City. This property is on 1.01 Acres.

I am writing to object to the denial of an extension for 30 days for public comment and to add my voice to the request for the extension and that the additional time be granted today, as, otherwise the entire objection response is due on Mon. the 24th.

It is my understanding that, by the law governing the environmental review process, the County **must** extend the time to 30 days if there is considerable interest or controversy about the project. Considering the level of interest and controversy indicated by numerous objections made in writing to the Board of Supervisors, the comments made at the past 2 Board of Supervisor's meetings, and the developer's own bigoted response to those comments, it is difficult to understand what would be needed to demonstrate a high level of interest or indicate controversy.

Please extend the comment period to 30 days and do it today, as anything else would require the objections to HUD and the County to be submitted by Monday, and the extension would be moot.

Thank you for your consideration

Sincerely,

Toni Wittenmeier

From: [Traci Schilling](#)
To: [FederalGrants](#)
Subject: 825 Drake
Date: Monday, April 24, 2023 1:51:28 PM

[You don't often get email from tracilou@me.com. Learn why this is important at

I object to the proposed development at 825 Drake Avenue. Five stories high, this building will block essential sunlight for Village Oduduwa and its senior citizen residents, especially during winter.

Seniors, often mobility challenged, may rely on widows for sunshine and the health benefits that come from our exposure to sun and light as well as the joy of an open visita.

Please don't block the sun, please say no to vouchers, please consider the harmful impact on seniors at Oduduwa.

Best regards,
Traci Schilling, RN

From: [Tracy Tandy](#)
To: [FederalGrants](#)
Subject: 825 Drake Ave., Marin City Development Project
Date: Friday, April 21, 2023 5:51:27 PM

You don't often get email from tracyts@comcast.net. [Learn why this is important](#)

Federal Grants Marin County,

I am opposed to this project going forward. Seventy units and **23** parking spaces is a flawed design. The interview by Alexis Grevorian demonstrates that the developer has no understanding of the residents that live in Marin City. This property is on 1.01 Acres.

I am writing to object to the denial of an extension for 30 days for public comment and to add my voice to the request for the extension and that the additional time be granted today, as, otherwise the entire objection response is due on Mon. the 24th.

It is my understanding that, by the law governing the environmental review process, the County **must** extend the time to 30 days if there is considerable interest or controversy about the project. Considering the level of interest and controversy indicated by numerous objections made in writing to the Board of Supervisors, the comments made at the past 2 Board of Supervisor's meetings, and the developer's own bigoted response to those comments, it is difficult to understand what would be needed to demonstrate a high level of interest or indicate controversy.

Please extend the comment period to 30 days and do it today, as anything else would require the objections to HUD and the County to be submitted by Monday, and the extension would be moot.

Thank you for your consideration

Sincerely,

Tracy Tandy

From: mmackel@gmail.com
To: FederalGrants; todd.r.greene@hud.gov
Subject: Objections to the Drake Avenue Apartments Heros # 90000010311721
Date: Monday, April 24, 2023 3:41:05 PM
Attachments: [Cover letter for FONSI.docx](#)
[825 Drake - Objections to FONSI.docx](#)

You don't often get email from mmackel@gmail.com. [Learn why this is important](#)

To: federalgrants@marincounty.org, todd.r.greene@hud.gov

RE: Objections to the DRAKE-AVENUE APARTMENTS
HEROS NUMBER 90000010311721
825 DRAKE AVENUE, MARIN CITY, CA 94965

DATE: April 24, 2023 - 3:35pm PST

Objectors: Save Our City, represented by: Bettie Hodges, Rev. Dr. Rondall Leggett, Debra Turner, Tiawana Bullock, Terri Green, Felicia Gasden, Marilyn H Mackel,

Address: 3001 Bridgeway # 422
Sausalito, CA 94965

Telephone number: 323.807.8006

Basis for our objection: 24 CFR § 58.75, b) The responsible entity has failed to make findings pursuant to [§ 58.40](#) or to make the written determination required by [§§ 58.35](#), 58.47 or 58.53 for the project, as applicable.

In preparing an EA for a particular proposed project or other action, the responsible entity must, **and did not:**

(a) Determine existing conditions and describe the character, features and resources of the project area and its surroundings; identify the trends that are likely to continue in the absence of the project.

(b) Identify all potential environmental impacts, **whether beneficial or adverse**, and the conditions that would change as a result of the project.

(c) Identify, analyze and evaluate all impacts to determine the significance of their effects on the human environment and whether the project will require further compliance under related laws and authorities cited in [§ 58.5](#) and [§ 58.6](#).

A copy of the objection was mailed to the responsible entity's certifying officer, at the same time as sent to the identified HUD contact, Todd R. Greene

Signed by: Marilyn Mackel
Save our City
April 24, 2023

OBJECTIONS TO MARIN COUNTY'S ENVIRONMENTAL ASSESSMENT/FONSI

CLIMATE CHANGE IMPACTS

Flooding

The estimated 182 new residents will take a toll on Marin City's overtaxed infrastructure, negatively impacting the 2,993 people currently living in Marin City. Fifty-five percent of Marin City's population are People of Color.

Marin City is its own watershed. Built in a natural bowl, the highlands and every surface drain naturally into what was historically fertile saltwater marshlands. In event rains, all the water ends up in the lowlands which are now the concrete parking lots of the Marin Gateway Shopping Center and the bottom of Donohue Street – another paved surface which also provides the only way in or out of Marin City for both for pedestrians and for vehicles. Residents have been stranded inside their homes or prevented them from reaching their homes. Children have been unable to make their way home after school.

Adding to the flooding problem, the Marin City watershed has no upstream ponds or wetlands. Without storage areas, there is nothing to slow down the stormwater flow from the steep hillsides, according to Leventhal. (<https://pacificsun.com/marin-city-flooding/>)

The issue will worsen with the sea level rise and increased rainfall intensity due to climate change, according to Roger Leventhal, senior engineer for the Marin County Department of Public Works. These two factors will form a "perfect storm for flooding" in Marin City, Leventhal said. (<https://pacificsun.com/marin-city-flooding/>)

Highway 101 blocks stormwater from flowing out from the watershed to the Bay and also contributes polluted stormwater runoff to Marin City. The community has only one road in and out (Donohue Street), and that road floods with those polluted waters. It's an unincorporated community without self-representation and depends on the County of Marin for public works.

The County is working with Caltrans on an improvement project, which includes plans to bore a second culvert under Highway 101 and construct a new flood wall around Marin City's drainage pond. Leventhal said as sea levels continue to rise, the upgrade won't be sufficient to prevent flooding.

"I have spoken with the County fire department and the Department of Emergency Services," Marin County Supervisor Stephanie Moulton-Peters said. "I've been told they do have equipment to get people out of Marin City during a flood, including trucks, skiffs and boats." (<https://pacificsun.com/marin-city-flooding/>)

While the additional 182 people living in the development will not necessarily exacerbate flooding that, it places an additional burden on the community during a flooding emergency. Increasing Marin City's total population by almost 7% will make it more difficult to safely evacuate residents during a major flood, especially with only one community ingress and egress.

The 5 story building proposed for 825 Drake Avenue may not have on-site flooding issues however, all of the hard-scaping; the roofs, walls and paved ground will all produce stormwater runoff that will contribute to the pollution and endangerment of everyone in Marin City. A pump station cannot be

relied upon to alleviate the dangers, especially as Sea Level Rise continues to put more pressure on existing infrastructure and ground water saturation levels. The existing pump station adjacent to the tidally active saltwater lagoon between Highway 101 and the Mall is an example. It is often needing repair and emits sewage odors on a regular basis.

https://www.sfestuary.org/wp-content/uploads/2022/09/SFEP_RWNA_09.07_MarinCityClimate.090122.pdf

[The Peoples Plan \(Marin County\) — Bay Area: Resilient By Design Challenge \(resilientbayarea.org\).](https://www.resilientbayarea.org/)

Wildfire

The proposed development at 825 Drake Avenue is in a state-designated high fire hazard zone. There is a growing likelihood of wildfires. This project sits in the middle of Marin City. Marin City is surrounded on two sides by the GGNRA. The development is within a few hundred feet of the Marin Headlands portion of the GGNRA, which consists of 2,100 acres of undeveloped federal parkland full of dense and dying vegetation, including Oak, Eucalyptus, Pine, Madrone and Bay trees. Shrubs closer to the ground include several species of Broom, Coyote Bush, and Manzanita. All are very flammable. A recent forest fire in the Marin Headlands triggered a shelter-in-place order to residents. If an evacuation was ordered, the single egress route would create a potentially deadly backup of residents attempting to escape. It is likely only a matter of time until a natural disaster descends on Marin City.

LAND DEVELOPMENT

Conformance with Plans – The community’s comprehensive long-range plan

- A. This project, 5 stories tall, 74 units/23 parking spaces built on **1.1 acres of land**. Neither it’s size, density, scale, or mass is in keeping with the surrounding built environment nor any built environment within miles. The residents of this community are and have been in **STRONG** opposition to this development since its inception. **All** housing in this community, **INCLUDING THE PUBLIC HOUSING BUILDINGS CALLED GOLDEN GATE VILLAGE**, have open spaces, balconies, or terraces, play facilities, parking spaces, and are built to facilitate the safety of children and adults alike. You cannot leave Marin City to go to any northern or southern city (except adjoining Sausalito) without using the bicycle trail, or by driving on the 101 highway. Intercounty transportation is grossly inadequate. So, persons residing here without an auto are restricted even more than is the norm in living *spaces* (https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/publications/communityandareaplan/marin_city_community_plan_1992.pdf pg. 9.).
- B. This project will sit near the top of the “Flat Fishbowl Area” in Marin City on Drake Avenue. “This area, originally a salt marsh around an inlet of Richardson Bay, was filled with elevations ranging from 5 feet (near Donahue Street) to 25 feet (near the upper section of Drake Avenue),” where this project will sit. (*Marin City Community Plan pg. 2.)
- C. The Project will sit in a **Cal Fire Very High Severity Zone**. It has only one way in and out, and those access points of ingress and egress have frequently flooded blocking ability of residents to leave or enter. See *Marin City Drainage Study pages 14-15 The points of

entry and exit and one end of the street (Drake AV) on which this is located floods during king and high tides.

- D. The Marin City Community plan (requires before any new development is built at least another road is built for ingress and egress.
- E. The project exceeds the Density allowed by the County of Marin's Community Plan. The maximum Density 1.1 acres is 40 units. While a new State law allows a density Bonus, HUD's Environmental Impact Assessments CANNOT and MUST NOT allow Developers seeing federal funding to place residents in harm's way. Marin City has the greatest population density in Marin County. See
- F. The project sits in a **blind curve on a hill** directly **across** from the only **park** in Marin City. <https://www.tpl.org/our-work/rocky-graham-park>
 - a. The park is small – only 1.095 acres. Described by users as a “decent little park”, great little park.”
 - b. There are few available parking spots, and none most days – families double park to load and unload children. Community members know to drive with caution.
- G. The building is massive and will block completely the sunlight for the ODUDAWA senior housing complex. Common sense. That this developer, and our county would even consider building this monstrosity. Sun does not go over buildings to reach the one behind it.

Scale and Urban Design – Building Styles, Density

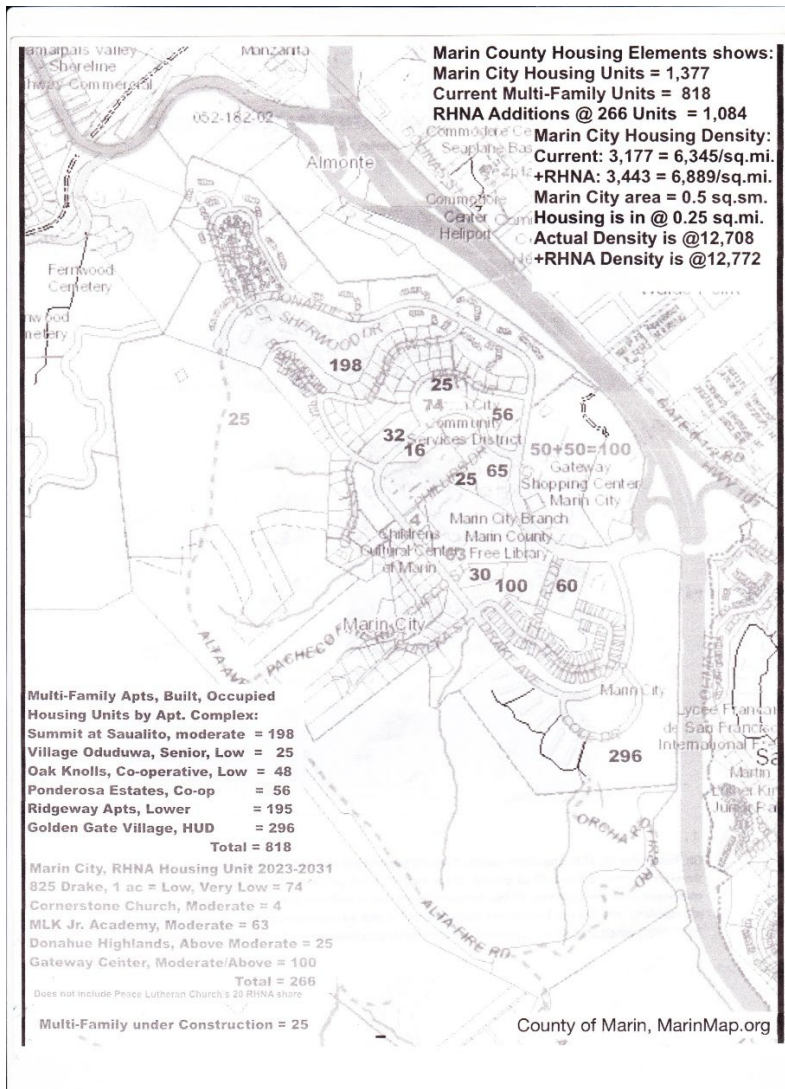
Though the Marin County Countywide Plan designates the project site as MF 4.5 and 100% affordable housing technically qualifies it for a density bonus. What is not given enough consideration, is the fact there are 818 units nearby, as well as a children's play area directly across the curvy street. The rating of Impact Code 2 signals that the lives of those in the community do not matter. Marin City has the most affordable housing and the densest housing area anywhere in Marin County. This is clearly disparate impact. Disparate Impact Refers to practices in employment, housing and other areas that adversely affect one group of people.

The inaccessibility of the documents supporting the impact rating of Code 2 obstructs the ability to the necessary County staff thinking on this inappropriately sized and placed, I will use the data I have available and the human impact that this project clearly has on Marin City residents.

1. **The 5 stories block the light and views of the 25 units of senior housing** – Village Oduduwa directly behind the project. Imagine having seniors having their daylight taken away which they have enjoyed and is essential for a healthy life.
2. Density without adequate parking 74 units with 23 parking spaces= **51 units with no parking nearby**. This impacts the existing 818 housing units located in adjacent area. It also impacts people living in the proposed building as well. It is on a hill, a steep hill. Walking up and down that hill to get groceries, work and go to the store is inhumane. There is no white community in Marin County that would stand for this. We are sure you are conscious of that fact. It creates disparate impact on the entire community.

3. Human impact is high leaving few places to park in a steep hillside that many cannot physically navigate. **Seniors, handicapped individuals in many cases will be at risk, parking and navigating to their existing homes.**
4. Marin City Housing Density =6,345/sq. mile. **Marin City is =.5 sq. mile.** The Actual housing density is **12,708 per .25 square mile before this project is completed.** It is the densest housing in Marin County and has the most affordable housing than any other area of the County. This housing serves residents in the County as a whole. SB35 clearly states that this legislation is meant to require communities (most of them) that have not built affordable housing and not unfairly burden those that have done their share.
5. Increased traffic will be on a street that has a children's park and seniors in high density area puts all residents at risk. **Additionally, the children's park is on a blind curve and speeding is frequent. Parents and Seniors shouldn't have to navigate a dangerous curve and street, because a developer wants to max out his profit.**

In summary the safety, health and welfare effects on this neighborhood would be significant and last for decades into the future. These characteristics and impact on residents warrant an Impact Code 4 at best and ideally be rejected unless it is **significantly** down sized.



Hazards and Nuisances Including Site Safety and Noise – Fire-Prone areas, Floods from Weather events

The topics of Fire-prone areas and floods were covered in the Climate Change category above. The topic of site safety includes the issues 6 and 7 in the Scale and Urban Design category. Regarding other hazards and nuisances:

Explosive and Flammable Hazards

825 Drake is actually within 2,400 feet of the Manzanita/Commodore Seaplane Adventures, San Francisco Helicopters landing pad and 5,999 gallon tank, plus a new one, un-permitted by BCDC. Owner is being fined by BCDC. <https://www.marinij.com/2023/03/25/marin-air-tour-operation-battles-mounting-state-fines/>

In contradiction to the County’s An explosion combined with wind from N, NE or E could easily carry particles into Marin City. Marin IJ article notes addition of a second gas tank without a permit from BCDC. <https://www.marinij.com/2023/03/25/marin-air-tour-operation-battles-mounting-state-fines/>

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. One mile = 5,280 feet. 2,400 feet = 0.45 or less than 1/2 mile

Noise abatement and control

The County's analysis ignores helicopter and seaplane tours from Commodore, Nearest measuring location at jct of Hwy 1 and 101 is likely near, but beyond where seaplane and helicopters land and take off. Is there a dB measuring device near the steep hill that all vehicles, cars, trucks, buses and semi-tractors have to labor up. The Marin City bowl is mostly higher than 65 dB but no measurements were made.

Seaplane and Helicopter landing pads are at the southern end of Manzanita, and The Strawberry homeowners contended that Seaplane Adventures had expanded its operations, however, by using larger commercial seaplanes. Planning division staff reported that following a complaint about the business in 2015 it hired BridgeNet International, an aviation consulting firm, to monitor compliance with the use permit. BridgeNet found that Seaplane Adventures did at least twice exceed the 86-decibel level by up to 2.5 decibels.

Source: <https://www.marinij.com/2017/08/28/marin-commission-rejects-tighter-regulations-on-seaplane-business/>

Both seaplanes and helicopters takeoff and/or land in Richardson Bay, carry tourists over GGNRA, Muir Woods, to San Francisco and back to Manzanita. They are often fly low and under some wind conditions takeoff and altitude is well beyond the Floating Homes community. These slow take offs are extremely noisy and would carry into the Marin City housing bowl.

Superfund Proximity

The proposed low-income housing at 825 Drake Avenue is less than a mile from a Superfund site, according to the Environmental Protection Agency. The Superfund site, located in Sausalito, is not currently a national priority based on existing information.

(<https://cumulis.epa.gov/supercpad/CurSites/csitinfo.cfm?id=0903540>)

State-Listed Hazardous Materials Sites in Marin County

There are 14 hazardous materials sites within three miles of 825 Drake Avenue. Some of the sites require further action and others have land use restrictions.

https://ehq-production-us-california.s3.us-west-1.amazonaws.com/c496e1b816029fd919f367083e73950f015afcb3/original/1665113228/8799c28740754b44faaf5762d9075028_AppendixF_reduced.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKICO37GBEP%2F20230422%2Fus-west-1%2Fs3%2Faws4_request&X-Amz-Date=20230422T074908Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=08871eb5f9e5379ec31982e1c1575534f94487b544df9309095c892f1cbc9ee9

SOCIOECONOMIC

Employment and Income Patterns

There are no assurances that the project construction jobs will "be filled by local workers."

The developer of the project has not committed to hiring Marin City residents for the construction or maintenance of the property. There has also been no commitment to a worker training or apprenticeship program by the developer. The developer was specifically asked about hiring and training local residents during the presentation at the Marin City Community Services District meeting on April 12, 2023, and he failed to commit to doing so.

Under SB 35, the project is required to employ “a skilled and trained workforce.” According to the 2020 data from the Census Bureau ACS 5-year Estimate, a total of 40 Marin City residents, equivalent to 2.6% of the Marin City workforce, are employed in the construction industry. It is unknown whether these 40 workers are considered “skilled and trained.”

Based on the average median income of \$32,847 for a Marin City individual, it is unlikely that many residents are “skilled and trained” in the construction field. The average hourly earnings in construction—a measure of all wages and salaries—is \$30.73, according to an analysis of 2018-2019 government data by the Associated General Contractors of America. The hourly wage is equivalent to an annual salary of \$64,918, which is approximately twice the annual earnings of the average Marin City resident.

Demographic Character Changes and Displacement/Disruption

Background

Marin City is a small, historically Black enclave located at the Southern end of one of the wealthiest, most segregated counties in the Bay Area. The community was established by the federal government during WWII to house workers who were building ships for the war effort.

At the conclusion of the war, the Black residents of Marin City were unable to buy or rent homes elsewhere in the area due to redlining practices. Instead, they were left to languish for the next 15 years in shoddily built structures that were intended to be temporary.

In the early 1960s, a public housing project, Golden Gate Village, was built to replace the dilapidated housing. The 296 units in Golden Gate Village house about 600 predominantly Black residents, many of whom are descendants of the WWII shipbuilders.

Other housing was also built in Marin City for Black residents during the years of redlining. Since then, additional low-income and market rate housing has been added to the community, resulting in the small area becoming densely populated.

Demographic character changes

There are glaring problems in the analysis made by the County in the Demographic Character Changes/Displacement section of its report. The County is using the 825 Drake development to correct its past failures, thereby attempting to keep the state and federal governments at bay.

Unfortunately, the County’s goals are in direct conflict with preserving the character of the local community, which is a historically low-income, Black neighborhood. The reality is that no other community in the extremely affluent, predominantly white County would accept the disingenuous

efforts to “improve” the neighborhood with an out-of-scale, five-story development perched atop a hill on a one-acre plot of land.

Adding insult to injury, the building will loom over the community’s only park, where school children play during the weekdays and families gather on the weekend. The two-story Village Oduduwa senior housing complex is set behind the proposed building, a mere 60 feet away, according to the developer’s plans. Sadly, the developer admits that 85 Drake Avenue will block the sunlight from reaching Village Oduduwa.

The County is using these 74 affordable units to help fulfill the affordable housing requirements set forth in the RHNA for the ABAG in Marin County. While the County must fulfill its RHNA numbers, it should not place the majority of its affordable housing in Marin City, which already has more affordable housing units than any other community in the County.

In addition, adding these 74 units is considered an easy solution to the “overhousing” issue in Golden Gate Village, a public housing project located in Marin City. However, it is an ill-conceived solution.

Overhousing typically occurs when children become adults and depart from the family home, leaving bedrooms without occupants. Since this issue was not previously addressed by the Marin Housing Authority, the majority of the overhoused units are occupied by seniors.

HUD has been very clear with the Marin Housing Authority and its Board of Commissioners that the overhousing issue must be resolved as soon as possible. In fact, HUD has been exerting pressure on the agency since at least May 2021 to correct all overhousing at Golden Gate Village, stating that the Marin Housing Authority is in violation of HUD regulations.

Obviously, it is the primary reason that the Marin Housing Authority has committed the 25 project-based Section 8 housing vouchers to the development. However, it is an untenable solution to the overhousing problem at Golden Gate Village.

The 825 Drake Avenue development is on a steep hill with only 23 parking spaces for 74 units. Even if a senior resident has a vehicle, odds are that they will not consistently find an available parking space. Climbing the hill will be difficult for seniors, especially when they are carrying groceries.

The 25 project-based Section 8 housing vouchers should be placed with units in developments that don’t require senior residents to descend and climb a steep hill each time they depart or return to their home. It is unreasonable and dangerous to relocate over-housed seniors from Golden Gate Village to 825 Drake Avenue.

Awarding the 25 project-based Section 8 housing vouchers to 825 Drake Avenue provides the private, for-profit developer with market rate rents for one-third of the units in the building. It ensures that the project “pencils out,” as the developer stated at Marin County Board of Supervisors meeting in March.

Since the Marin County Board of Supervisors doubles as the Marin Housing Authority Board of Commissioners, it has double incentive to push through this development. It helps the County to meet

its RHNA numbers for the state and the housing authority to come into compliance with HUD's regulations for overhousing.

The County has handed the developer the keys to the candy store, despite the fact that it will change the character and demographics of the Marin City community.

Displacement/Disruption

The County's statement that this project will not disrupt the demographic character of the community is false. It is disingenuous to use the County population data when discussing the magnitude of a five-story, 74-unit development in a small community.

It is accurate that the 182 new residents of the project would represent a 0.07 percent population increase in the County's population - a relative drop in the proverbial bucket. Yet, those 182 new residents will represent a 6.2% increase in the Marin City population.

This 6.2% increase in the population will absolutely disrupt the existing demographic character of this small community. Marin City, an unincorporated area of the County, has a population of 2,993, according to 2020 data from United States Census Bureau. Almost 23% percent of the community is Black.

While the 74 affordable housing units help fulfill the affordable housing requirements set forth in the RHNA for the ABAG in Marin County, the 74 housing units are located in Marin City, a densely populated community that already accounts for 44% of all affordable housing in the County.

The 85 Drake Avenue development received streamlined approvals under SB35, California's Housing Accountability & Affordability Act. The SB 35 "fact sheet" opines that "when local communities refuse to create enough housing—instead punting housing creation to other communities—then the State needs to ensure that all communities are equitably contributing to regional housing needs. Local control must be about how a community meets its housing goals, not whether it meets those goals."

(https://sd11.senate.ca.gov/sites/sd11.senate.ca.gov/files/SB%2035%20Fact%20Sheet_1.pdf)

Clearly, Marin City has not been "punting housing creation." In reality, Marin County has continued to thrust low-income housing projects into the densely populated community overrun with infrastructure problems.

Marin County must disperse affordable housing throughout other areas of the unincorporated County, rather than overburdening Marin City with the detrimental effects of clustering low-income households in a small geographic region.

By dispersing low-income housing to other areas of Marin County, it would allow "low-income families to secure housing options in more affluent communities—a proven strategy for promoting better health, increased employment, and earnings and educational attainment for low-income residents."

(Margery Austin Turner and Lynette A. Rawlings, "Promoting Neighborhood Diversity: Benefits, Barriers, and Strategies" (Washington: Urban Institute, 2009), available

at <http://www.urban.org/research/publication/promoting-neighborhood-diversity-benefits-barriers-and-strategies>)

Instead, Marin County is choosing to build another 74 units of low-income housing in a community already filled with low-income housing and plagued with significant infrastructure issues that are not being addressed.

“Federal and local subsidized housing programs also continue to prioritize building affordable housing in already-distressed neighborhoods, which reinforces the geographic segregation of low-income people of color who are residents.” (Racial Residential Segregation and Neighborhood Disparities by Solomon Greene, Margery Austin Turner, and Ruth Gourevitch, August 2017)

This is exactly the practice that Marin County has participated in for decades by continually building most of its affordable housing in one place: Marin City.

In doing so, the county is violating the disparate impact discrimination regulations, which “seek to ensure that programs accepting federal money are not administered in a way that perpetuates the repercussions of past discrimination.” (<https://www.justice.gov/crt/fcs/T6Manual7>)

Conversely, the rent structure of the project could contribute to the gentrification of the Marin City community, eventually leading to the displacement of current Marin City residents. The average Marin City resident will not be able to afford to rent a unit in the development using the rental rates in the developer’s plan.

The rents are determined by Marin County’s area median income, which is \$116,000 for an individual, according to HUD. However, Marin City’s area median income is just 28% of the county’s figure—\$32,847 for an individual—based on the most recent Census Bureau data.

“While increased investment in an area can be positive, gentrification is often associated with displacement which means that in some of these communities, long-term residents are not able to stay to benefit from new investments in housing, healthy food access, or transit infrastructure.” (<https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/>)

The possibility of gentrification must be considered when a single project on a one-acre parcel of land is increasing the population of a small community by more than 6%.

Environmental Justice

The following unresolved environmental justice issues have been discussed in the preceding topics.

- Flooding
- Fire hazards
- Site safety
- Explosive and flammable hazards
- Noise abatement and control
- Proximity to Superfund sites
- State-listed hazardous materials sites in Marin County

Additional Environmental Justice issues include, but are not limited to, the impacts of darkness on the residents next door and impacts from construction contaminants. Given access to the County’s

supporting documents for their justification of no significant impact, this list would likely be greatly expanded.

Darkness Impacts on Senior residents next door

The five-story building at 825 Drake Avenue will be built on a hillside, 60 feet away from the two-story, 23-unit Village Oduduwa housing complex for low-income seniors, owned by a nonprofit organization. The developer of 825 Drake Avenue attended a Marin City Community Services District meeting on April 12 and made a presentation showing that the new building will block sunlight from reaching Village Oduduwa.

Mold, a naturally growing toxin that can be dangerous to humans, is able to thrive in buildings when there is moisture and a lack of sunlight. The Bay ecosystem combined with the foggy conditions in Marin City provide the moisture component necessary for mold growth. With the new five-story building blocking out the sunlight at Village Oduduwa, mold exposure becomes a very real risk for the vulnerable senior residents.

Older buildings, such as the 33-year-old Village Oduduwa complex, are more susceptible to mold growth due to aged windows, cracks and decaying materials. In fact, most of Village Oduduwa has not been upgraded since it was built in 1985.

“The Institute of Medicine (IOM) found there was sufficient evidence to link indoor exposure to mold with upper respiratory tract symptoms, cough, and wheeze in otherwise healthy people; with asthma symptoms in people with asthma; and with hypersensitivity pneumonitis in individuals susceptible to that immune-mediated condition,” according to the Centers for Disease Control and Prevention.

Impacts from Construction Contaminants

Construction contaminants are a given with any project. However, the Village Oduduwa residents will be a mere five yards away from the construction of a five-story building, exposing this vulnerable, low-income senior population to a litany of contaminants.

Noise pollution from the construction is an obvious problem that will plague the Village Oduduwa residents and other neighbors in the densely populated area.

The Village Oduduwa residents will also be affected by airborne contaminants. “The main construction contaminants that spread around by wind include PM10 (particulate matter with a diameter less than 10 microns generating polluted dust), PAHs bound to particulate matter, VOCs (volatile organic compounds), asbestos, gases such as carbon monoxide, carbon dioxide, and nitrogen oxides,” according to the Environmental Pollution Center.

Equal access to the decision-making process

The Marin City Community has not been consulted at any time about the building of this project, nor about how it would be funded. The Community has, after learning that the County had approved the building of such a monstrous building, organized to oppose this development. The only opportunity for public comment came two days before the community learned that the county planned to approve the funding for this development. Following the public outrage, the developer arranged to meet with the Marin City Community Service District where additional opposition has been communicated.

COMMUNITY FACILITIES AND SERVICES

Education and Cultural facilities

The Sausalito Marin City School District is a California Basic Aid School District. It is entirely funded by portion of the collected property taxes. Substantial numbers of the real properties in Marin City are tax reduced or tax free because of the public subsidies that support them. - 44% of the Affordable housing in Marin County is located in Marin City. Most recently a development called Summit Apartments, and Ridgeway Apartments were afforded (by the County) tax concessions. For the Summit apartments, the tax concessions reported by the County Board of Education total as much as a \$67,000s annual loss of tax dollars for the School District. This scheme works for the developer WITHOUT THE GUARANTEED PROVISION OF AFFORDABLE WORKFORCE HOUSING.

<https://www.forbes.com/sites/schifrin/2021/12/02/california-scheming-municipal-bonds-workforce-housing-crisis-luxury-apartments/?sh=5b4327093001>

The Executive Director of Marin Housing recently acknowledged that she requires 40 apartments at the Summit apartment complex to house GGV residents while Marin Housing engages in the rehabilitation of its Public Housing. She acknowledged that those apartments will not be made available unless and until current tenants voluntarily move out. YET, Summit Apartments through the bond deal financing purchase of this property and “agreement” to provide workforce housing and Section 8 housing has received immediately a property tax free building.

Allowing these properties to exist tax free cuts deeply into the property and thusly the school and Recreational tax revenues for Marin City. The Marin City CSD receives approx. 100k annually from the County to run its program. They have to fund raise and seek grants to do programming and to staff its minimal operation.

The Marin City Community Development Corporation (MCCDC) has been informed, by LeeLee Thomas, head of the County’s Community Development Department, that the Community will receive a reduction in the annual set-aside payment it receives for the MCCDC & the community governing body, the Marin City Community Services District (MCCSD). The County has made tax concessions with property owners that reduce substantially the dollars available to the school district and for recreational facilities and services. This property at 825 Drake Av is another such concession.

This reduction of tax funding has already created significant impacts to the funding for the school district that lacks sufficient space to operate the school with the current population, and in the academic year 2022-2023 came close to take over by the County Superintendent. (*See Communication from Mary Jane Burke) for fiscal reasons. The school district remains under the Supervision of the CA Attorney General following a finding of segregation by the Sausalito run District Board, who had stripped the bulk of funds from the largely African American and Latinx Marin City Students to give them to the charter school. The charter school has been closed; the school district has almost completed two full years as a unified school. Today the school is barely able to serve its 325 unified students with the tax dollars received. The School District relies significantly on grants.

Additionally, the Sausalito Marin City School District Superintendent voiced the following concerns:

School district Superintendent, Dr. Itoco Garcia, stated at the April 20, 2023 SMCS D Board of Trustees meeting that he was never contacted about this project and its potential impact on the school and that the school district does not support this project in this community.

Safety concerns were also cited by Dr. Garcia. Being in a high fire risk area and high flood occurrence area with one road in and out of Marin City and a large number of residents [up to 264?] in this building, the ability to evacuate children from the school, given competition with so many more people trying to leave, will be significantly reduced.

The SMCS D Superintendent also cited concerns about the impact of the project’s inadequate parking on the current parking available for teachers and staff. This limited parking is already shared by several adjacent community organizations including a *Cornerstone Community Church of God in Christ*, Marin City Community Services District offices, Marin City Rec Center, Senior Center and likely the Marin City Health and Wellness Center. Because this parking is closer to the project than the County’s proposed alternative of the shopping center, it is likely to be the first choice of new residents, whose autos could consume its entirety.

There are additional concerns specific to the two schools that serve Marin City students. No info is provided in this statement about the (TK-5th grade) Sausalito campus of the SMCS D and its greater distance from the project. There is no mention of school transportation impacts for Transitional Kindergarten – 5th grade students who attend the Sausalito campus.

In terms of capacity at the school, the report cites the Facilities Master Plan only and says “projected to have capacity to support increasing populations” – no numbers or any specific clarification given. **The middle school campus in Marin City doesn’t have adequate classroom space now and there is no plan to increase it.**

There are no “human” environmental impacts related to education noted in this report at all. A particularly significant human impact of the is that there are reasons to expect renters will not remain in this building and this will bring instability to the school with students regularly revolving in and out.

- To cut costs and maximize his profit, the developer has exploited the reduction of usual minimum standard building regulations afforded him by SB 35. The builder’s plans include smaller than regulation window size, no outdoor space and no outdoor access by balconies or porches (See Sierra Club report from 2020), not to mention almost no parking. Such inferior living conditions will likely deter most residents from remaining there.

- The developer reported in a recent (date) Marin County BOS meeting that the project will have tight rules and controls over residents. No one wants to be ‘policed’ in their home. This is another deterrent from people wanting to stay in this housing.

Health Care/Social Services

Proximity does not equal Accessibility or Health Equity. These vouchers are intended for a population that is low income and largely people of color. The Black population in Marin County has the lowest life expectancy, highest premature age-adjusted mortality highest premature death, and highest percent of babies born low birth weight, compared to any other racial/ethnic group. 1

Only 56.7% of Blacks in Marin County aged 18-64 have health insurance compared to 91.8% of all other races and ethnicities in Marin County.¹ This means that those who may receive these vouchers will be more likely to need access to the Marin Health and Wellness Center (MHWC), the closest health facility for the uninsured. Currently, the wait for a new patient appointment at the MHWC for adults is 6-8 weeks.² The addition of 150 new residents and especially those that belong to an ethnic or racial minority will add to wait times at the clinic.

Additionally, there is no access to urgent care in Marin City and the public transportation system is not adequate to deliver sick residents to resources 7-9 miles away without long and uncomfortable rides and wait times that may result in higher morbidity at arrival.

The number of planned parking spaces for residents in this proposed project is inadequate. 24 spaces for ~150 residents requires residents, many with disabilities, to walk quite a distance to access their cars. This additional burden can lead to asthma attacks and other health crises.

1. 2022 Community Health Needs Assessment
2. Phone call requesting new patient appointment 4.20.23

Public safety

Public Safety is much more than just police and fire services.

The following safety issues are the currently unmitigated, often uncontrollable human environment safety concerns:

Marin City has one route in and one route out. This is an ongoing and growing concern as the climate crisis makes wildfires, flooding and mudslides in Marin City more likely going forward.

There are currently occasions when the Bridge Street tunnel floods, in the future those occurrences will increase. More concerning is the growing likelihood of wildfires.

This project sits in the middle of Marin City. Marin City is surrounded on two sides by the GGNRA which is full of dense and dying vegetation, including Oak, Eucalyptus, Pine, Madrone and Bay trees. Shrubs closer to the ground include several species of Broom, Coyote Bush, and Manzanita, all are very flammable.

This year we had an abundance of rain. In years like this, wildfires are less likely, but the risk of flooding and mudslides increases. In addition, the risk of mudslides increases significantly if the vegetation on the surrounding hillsides is removed due to the danger of wild fires during the dry years.

Highway 101 runs along the East side of Marin City adding to the danger of wildfires. There have been several instances of wildfires starting along this stretch of 101 in the past few years.

Bay marsh lands run along a northern portion of Marin City, near the shopping center and the entrance and exit to Highway 101 South. There are efforts underway to preserve the marshland and control flooding. There is no way of knowing how long these efforts will be sufficient to prevent flooding from sea level rise.

Placing a 74 unit high rise apartment building with just 24 parking spots, in an already very densely populated area in Marin City, would seem to be in direct contradiction to the public safety concerns listed above, that are escalating due to the climate crisis. The addition of 150 or more residents to an already dense area of Marin City puts these residents, as well as current residents at increased risk for adverse events from these safety concerns.

NATURAL FEATURES

Vegetation/Wildlife

1. The huge redwood tree on the property at 825 Drake is a heritage tree that was carefully protected by the previous owners of the property.

The major criteria for heritage tree designation are age, rarity, and size, as well as aesthetic, botanical, ecological, and historical value. Heritage tree ordinances are developed to place limits upon the removal of these trees; the ordinances are oriented towards a specific tree, not a woodland.

Three species, quercus (oak), sequoia (redwood) or cedrus (cedar) are considered “Heritage” if they have a circumference of twelve inches (12”) measured at fifty-four inches (54”) above natural grade.

When the Village Baptist Church was built over a 15 year period by donated labor from the Marin City community they were very careful to protect this beautiful tree. I interviewed the Rev. Christine Jones from the family that owned the property. (1)

It is clear that the beautiful Heritage Coast Redwood Tree (No. 930, the 53” diameter *Sequoia sempervirens* (coast redwood), will stand in the location of the first floor lobby of the proposed development at 825 Drake Avenue and the developer will seek a permit to remove the tree,

The tree removal permit is subject to the review and approval by the Planning Commission at the Marin County Community Development Agency. They could decide not to approve the developer’s permit, but that is not likely, and Marin City will lose this historic and culturally important Heritage tree that is across the street from the only public park in Marin City.

Please see the photos and analysis of this redwood tree in Exhibit 3: A History of a Heritage Redwood Tree and a Historic Grove in Marin City attached to the Sierra Club Marin Group Letter September 17, 2020 Vegetation / Wildlife (Introduction, Modification,).

2. Nesting migratory hawks have been observed in the Heritage Redwood Tree on the 825 Drake property. The Migratory Bird Treaty Act makes it illegal to disturb the nest any native bird without a permit. Federal and state laws protect all hawks and owls.

This has been confirmed in an interview with Ms. Ariel Soto-Suver who lives in an adjacent property at Oak Knolls, 706 Drake Avenue. 415-312-8545.

BSA indicates that on-site trees and buildings directly adjacent to the project site could provide hibernation or roosting habitat for two species of bats: the pallid bat and the hoary bat.

From: kevinharoff@gmail.com
To: [FederalGrants](#); todd.r.greene@hud.gov
Cc: [Washington, Brian](#); [BOS](#)
Subject: FONSI Comment Letter V2
Date: Monday, April 24, 2023 3:49:47 PM
Attachments: [FONSI Comment Letter V2.pdf](#)
Importance: High

Some people who received this message don't often get email from kevinharoff@gmail.com. [Learn why this is important](#)

Please see attached.

Kevin Haroff | **HAROFF LAW P.A.**™
1.415.860.3356 | kharoff@harofflaw.com

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April 17, 2023

By Electronic Delivery (federalgrants@marincounty.org)

Housing and Federal Grants Division
County of Marin, Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
Attn: Leelee Thomas, Deputy Director of Housing and Federal Grants

**DRAKE AVENUE APARTMENTS PROJECT –
FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

Dear Ms. Thomas:

I represent the Golden Gate Village Resident Council (the “Council”), which has asked me to convey the Council’s concerns over the County of Marin’s determination that the Drake Avenue Apartments Project at 825 Drake Avenue, in Marin City, CA (the “Project”) will have no significant impact on the human environment and that an Environmental Impact Statement (“EIS”) is not required under the National Environmental Policy Act of 1969 (“NEPA”).

The Council represents the interests of the members of the residential community of Golden Gate Village (“GGV”), a large and historic low-income development project located in close proximity to the Project Site. The Council believes that GGV residents and those living in Marin City generally will be significantly affected by the Project in numerous ways, including aesthetic impacts, impacts on local parking availability, impacts on the use of local recreational facilities and other public infrastructure, and potentially other respects. There is widespread sentiment within the community that these impacts may be substantial and highly disruptive to the overall quality of life within the community. A full environmental review of these impacts is clearly warranted.

The County has imposed a deadline of April 24, 2023 for members of the public to provide formal comments regarding the potential environmental impacts to the Project. Given the highly controversial nature of the Project, additional time is needed to prepare and submit comments beyond that minimum statutory deadline. 24 CFR sec. 58.46 clearly envisions that “[t]ime delays for exceptional circumstances” are allowed for controversial or unique projects or those similar projects normally requiring preparation of an EIS. The Drake Avenue Project presents exactly the kind of exceptional circumstances that warrant a time delay in the minimum allowed public comment period.

It is entirely within the County’s discretion to allow such a delay in this case. Indeed, failure to allow a minimum 30-day comment period would be an abuse of that discretion. Consequently, the Council respectfully requests that the County extend the public

Leelee Thomas, Deputy Director of Housing and Federal Grants

April 17, 2023

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comment period for the its determination no significant environmental impact for the Project for at least additional 15-days beyond the current April 24, 2023 deadline. In addition, because the existing deadline is now just one week from today, we would appreciate receiving your response to this request by the close of business tomorrow, 5:00 p.m., April 18, 2023.

Respectfully yours,



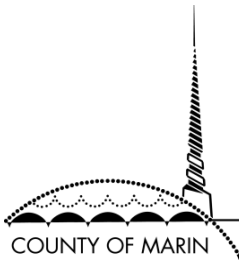
Kevin Haroff
Haroff Law P.A.

Copy (by Electronic Delivery):

Mr. Todd Greene
U.S. Department of Housing and Urban Development
todd.r.greene@hud.gov

Separate Copy (by Electronic Delivery):

Matthew H. Hymel, Marin County Administrator
Brian Washington, Marin County Counsel
Members, Marin County Board of Supervisors



COMMUNITY DEVELOPMENT AGENCY
HOUSING AND FEDERAL GRANTS DIVISION

Sarah B. Jones
INTERIM DIRECTOR

April 18, 2023

By Electronic Delivery to kevinharoff@gmail.com

Marin County Civic Center
3501 Civic Center Drive
Suite 308
San Rafael, CA 94903
415 473 6269 T
415 473 7880 F
415 473 2255 TTY

Kevin Haroff
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111

Re: Comment Period for Drake Avenue Apartments Project – Finding of No Significant Impact (FONSI)

Building and Safety
Environmental Health Services
Planning
Environmental Review
Housing
Sustainability
Code Enforcement
GIS
Federal Grants

Dear Mr. Haroff,

I write in response to your letter dated April 17, 2023 requesting an extension of the comment period regarding the County's determination that the Drake Avenue Apartments Project at 825 Drake Avenue, in Marin City, CA (the "Project") will have no significant impact on the human environment under the National Environmental Policy Act of 1969 ("NEPA").

www.marincounty.org/cda

Staff have reviewed the record, including comments received so far, and respectfully decline to extend the comment period beyond the current April 24, 2023 deadline.

We will continue to work with our representative at the U.S. Department of Housing and Urban Development (HUD), the Marin Housing Authority, the community and the project applicant to ensure compliance with our responsibilities as the responsible entity on behalf of HUD.

Please let me know if you have any further questions. I can be reached by email at lthomas@marincounty.org or by phone at (415) 473-6697

Sincerely,

Leelee Thomas
Deputy Director, Housing & Grants Division