



Thursday, June 2, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Inga Birkenstock

### Community You Live In/Represent

san geronimo

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

inga@bld-light.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

214

### Comment or Suggestion

Suggest that licensed short term rentals can remain, and only prohibit new licenses.

We have 2 properties:

1 in San Geronimo that is licensed as a short term rental and providing needed income due to loss of wages during covid, and the other in san rafael that we are trying to convert the zoning from business property to residential so we can live here while collecting income from the other home. Cannot seem to get a response from zoning about that!



Thursday, June 2, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Andreza Barriola

### Community You Live In/Represent

Novato

**Please select the best way to reach you in case there are questions about your submission**

Phone

### Phone Number

(415) 827-3834

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

No I don't



Thursday, June 2, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Andrew Walmisley

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

andrewwalmisley@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

## **Comment or Suggestion**

The vast majority of Point Reyes Station community members are opposed to the construction of housing on the Green/Red Barn site on Mesa Road. The recommendation to build 24 units on that site is way out of scale for our town, will negatively impact the quality of life in our community, change the rural character of the town, and cannot be sustained environmentally due to septic and drainage constraints. We strongly urge the County of Marin to remove this site from the Housing Element list. A number of individuals, including supervisor Rodoni, are convinced that building will never take place on that site for all the above reasons. It is, therefore, absurd to keep it on the list. We promise to fight this relentlessly!





Sunday, June 5, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Lauren Beal

### Community You Live In/Represent

Lucas Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

lbeal@mac.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

I encourage more caution and long term thinking with regard to water shortages and fire danger. In reading the Housing Element I learned that more development is encouraged in order to meet state mandates. Yet sites being considered are already cutting back on water use and/or are in areas of high fire danger. The danger of fire is exacerbated by the lack of exit corridors. I believe we need to build in higher density with multiple story apartment buildings to rent at affordable prices. I think we might do this in the town centers and along the rail and bus corridors. Chucky Cheese Pizza in Marinwood is no longer and the little shopping center is dead there. It would be a great location for an apartment complex. We don't need more shopping centers or retail so we need to

alter the tax structure to avoid dependency on retail development for tax revenue. Mixed use apartment buildings would allow for retail on the bottom and housing on top floors. Corte Madera already has one example of this near the DMV. The old theater property nearby there is shut down. They could convert that to housing. Another good location without further buildout. Build up, not out.

I also think we need to subsidize housing costs for teachers, firefighters, police, and other service employees to make it possible for them to live within the community they work in. Marin's high priced homes will diminish in value if a workforce to support residents disappears.

I don't believe in growth for growth's sake. There are limits to how much you can expand a balloon. The Housing Element makes me uneasy as it seems to rely on futuristic solutions in water technology which may or may not materialize. It also assumes the drought will end. There are limits imposed upon us by nature. We cannot continue to expand in spite of nature. It is far more powerful than we are. But our humanity demands we help those who are in need.



Wednesday, June 8, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jack Krystal

### Community You Live In/Represent

Southern Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jkrystal@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

Two letters with pertinent comments dated 5/19/2022 and 4/5/2002 regarding the parcel located at 260 Redwood Hwy Frontage Road (APN: 052-227-09) with the adjoining privately owned streets and two additional parcels owned by Diversified Realty Services and Charles Coyne were sent to Thomas Lai, Director of the Marin County Community Development Agency and Lellee Thomas, the Deputy Director of the Agency. Did you receive these comments and opinions on these topics?



Wednesday, June 8, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Michael Levy

### Community You Live In/Represent

Tam Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

mjlmv@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

Housing Element: Marin County Wide plan C-20 and C-21

### Comment or Suggestion

I made a previous suggestion to consider the existing Motel on Shoreline Hwy to become housing, as was done with the Fireside Motel site - never received a response. This is an ideal existing site, with parking, and would not adversely affect traffic or congestion - which is already very bad - even worse on weekends with traffic going to and coming from Muir Woods, Stinson and Muir Beaches.



Wednesday, June 8, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Barch

### Community You Live In/Represent

Santa Venetia, San Rafael, CA

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

onep220no380@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Santa Venetia is very small and has only two lanes of travel for fire evacuation. Current water supply levels and limited evacuation potential make the addition of residential housing a very poor choice. Please rethink locations for housing additions. A BIG mistake here.



Thursday, June 9, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

John Bischoff

### Community You Live In/Represent

San Rafael, West End

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jabischoff@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 3: Constraints

### Page Number

112-114

### Comment or Suggestion

Hi,  
I'm just beginning to study sea level rise and it's affects on policy and physical environment so I'm no expert. The current reference I am studying is "A Blueprint for Coastal Adaptation" by Kousky, Fleming and Berger, Island Press. There is a section all about San Rafael in the book.

I noted in the storms last year that San Rafael is already experiencing Pluvial flooding and some sea level effects coupled with heavy rains.

My question / comment is: Have you looked at the potential impacts on the plan if a decision were made to not build any new housing in the 100 year flood plane and within the footprint of effects from 5' of sea level rise? (Not being optimistic of our being able to stop warming) Some would recommend the 500 year flood plane. The table on page 114 seems to imply over 4000 units (in presumably fewer structures) would need repair or rebuilding or moving or raising. Building in these areas seems to imply that rebuilding and repairing over and over again would be required and for lower income housing, would affect low income people the most.

I think this section could be a little more clear as to why the risk of building in these areas is worth taking and potentially reference external research on what is expected in the next 30 years and what contingency plans are.

This is the section I went to first so I will confess I have not read the entire report yet.

THANKS for this opportunity.

John Bischoff

**From:** [Thomas, Leelee](#)  
**To:** [Tanielian, Aline](#)  
**Cc:** [Zeiger, Jillian](#)  
**Subject:** FW: Following up | Housing Element Workshop  
**Date:** Friday, June 10, 2022 10:43:27 AM  
**Attachments:** [image001.jpg](#)  
[Monterey 20152023HousingElementAdop.pdf](#)

---

Public comment to be included

---

**From:** Ericka Omena Erickson <eerickson@liifund.org>  
**Sent:** Friday, May 27, 2022 5:51 PM  
**To:** Thomas, Leelee <LThomas@marincounty.org>  
**Subject:** RE: Following up | Housing Element Workshop

Hi, Leelee,

I hope you and your family are well.

How is the County Housing Element update process going? I took a look at the page about it, and I am glad to see that the process is pretty advanced.

Our team is working on including child care policy/program language for inclusion in cities'/counties' Housing Elements. We have a consultant working in San Mateo, especially on this theme, and I thought of you and our process in Marin.

So, I would love to hear your insights on the most effective way for me (and local community organizations) to participate in the process to have this included there?

I searched child care in the draft Housing element programs documents and didn't find anything related to child care facilities. I want to suggest including related language in the programs section like the "Program. 2.c - Make provisions for multifamily housing amenities. Objective. Make appropriate consideration for families with children and larger households. Schedule." Sample language is attached, starting on page 22.

The following are links to informative publications on this topic:

- Housing Development and Child Care Facilities: Strategies and Financing- <https://www.liifund.org/justgoodcapital/2020/09/14/housing-development-and-child-care-facilities-strategies-and-financing/>In Their Own Words – How Co-Location Strategies Support High-Quality Child Care and Strong Communities - <https://www.liifund.org/justgoodcapital/2021/11/03/how-co-location-strategies-support-strong-communities/>



I am looking forward to hearing from you.

Wishing you a great holiday weekend,

Ericka

**Ericka Omena Erickson**

Policy and Program Officer, Early Care and Education

[eerickson@liifund.org](mailto:eerickson@liifund.org) | [415.489.6119](tel:415.489.6119) Ext 319

**Low Income Investment Fund (LIIF)**

49 Stevenson St., Suite 300, San Francisco, California, 94105

[www.liifund.org](http://www.liifund.org) | [Facebook](#) | [Twitter](#) | [YouTube](#) | [LinkedIn](#)

We're driving \$5 billion to advance racial equity. [Find out why.](#)

---

**From:** Thomas, Leelee <[LThomas@marincounty.org](mailto:LThomas@marincounty.org)>

**Sent:** Tuesday, November 16, 2021 8:52 AM

**To:** Ericka Omena Erickson <[eerickson@liifund.org](mailto:eerickson@liifund.org)>

**Subject:** RE: Following up | Housing Element Workshop

Erika, great to see you too! Yes, these units would count towards our RHNA. Please let me know how I can support this effort. I'm just unwinding from Emergency COVID response work and have some bandwidth and happy to help.



**Leelee Thomas**

Deputy Director

Housing & Federal Grants Division

County of Marin

Community Development Agency

3501 Civic Center Drive, Suite 308

San Rafael, CA 94903

415 473 6697 T

415 473 2951 F

---

**From:** Ericka Omena Erickson <[eerickson@liifund.org](mailto:eerickson@liifund.org)>

**Sent:** Tuesday, November 16, 2021 8:39 AM

**To:** Thomas, Leelee <[LThomas@marincounty.org](mailto:LThomas@marincounty.org)>

**Subject:** Following up | Housing Element Workshop

Great seeing you in action yesterday, Leelee! I hope everything is going well with you and your family.

Quick update and question: I am talking with Dr. Garcia, Superintendent of Sausalito Marin City School District, about affordable housing units and child care facilities being planned for District staff. We are connecting them with Bridge Housing and exploring possible financing options. Are these units in the School District's facility update plan considered in the RHNA numbers?

**Ericka Omena Erickson**

Policy and Program Officer, Early Care and Education

[eerickson@liifund.org](mailto:eerickson@liifund.org) | [415.489.6119](tel:415.489.6119) Ext 319

**Low Income Investment Fund (LIIF)**

49 Stevenson St., Suite 300, San Francisco, California, 94105

[www.liifund.org](http://www.liifund.org) | [Facebook](#) | [Twitter](#) | [YouTube](#) | [LinkedIn](#)

We're driving \$5 billion to advance racial equity. [Find out why.](#)

Email Disclaimer: <https://www.marincounty.org/main/disclaimers>

# Promoting the Power of General Plans: A Strategy to Support Early Childhood Development

## Executive Summary

Research underscores the importance of early childhood development. Upstream, preventative programs and services have the largest impact over a child's lifetime. Policy makers have a unique opportunity to lay the foundation for timely investments in early childhood by including early childhood policies in general plans. These policies will prioritize our youngest residents and their families through well-informed decision-making.

One method of influencing change in communities is strategic planning through a general plan. A general plan is a broad document, comprised of various elements, that guides a city or county's direction and priorities. Within each element, policies identify how early childhood can be integrated into the fabric of a community, implementation plans outline how quality programming will be achieved, and work to build collaborative partnerships is identified. In general plans, early childhood development policies demonstrate governments' understanding of the long-lasting value of early learning. Ultimately, communities' commitment to family friendly general plan policies and implementation will increase access to affordable and high quality early childhood education.

## WHAT HAPPENS WHEN COMMUNITIES INVEST IN EARLY LEARNING



Figure 1: Image courtesy of Bright Beginnings

## Promoting the Power of General Plans: A Strategy to Support Early Childhood Development

Research underscores the importance of early childhood development. “Early experiences affect the development of brain architecture, which in turn provides the foundation for all future learning, behavior, and health,” according to the Center for the Developing Child at Harvard University.<sup>i</sup> The first 5 years of life are critical for children’s development-- nearly 85% of the brain develops during this time. Yet, only 14% of public education dollars are spent on early childhood education (ECE) in the United States.<sup>ii</sup>

### Quality Early Childhood Environments

Upstream, preventative programs and services have the largest impact over a child’s lifetime. Quality early childhood education makes a difference for all children, has the greatest impact on closing the “opportunity gap” for under-resourced children, and is closely linked to increasing children’s welfare. Further, high quality child care settings provide safe, nurturing environments while promoting young children’s physical, social, emotional, and intellectual development. Low-quality child care is especially detrimental to low-income and vulnerable children.<sup>iii</sup>

### School Readiness

Kindergarten readiness establishes a foundation from which children can learn successfully. Children who are ready to enter school are more likely to experience later academic success, attain higher levels of education, and secure employment.<sup>iv</sup> Children ready for kindergarten tend have commonalities, including that their parents read to them daily, were enrolled in preschool, and that their transition to kindergarten was reported by their parent(s) as “easy.”<sup>v</sup> According to the Annie E Casey Foundation, children who do not read on grade level by 3<sup>rd</sup> grade are four times more likely to drop out of high school.<sup>vi</sup>

### Economic and Social Outcomes

Nobel Memorial Prize Winner Dr. James J. Heckman stated that investing in “quality early childhood development heavily influences health, economic, and social outcomes for

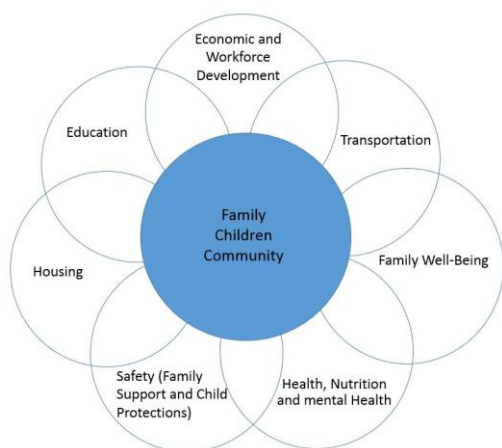
## Monterey County Early Childhood: Fast Facts

- There are 47,545 children aged 5 and under (2016). <sup>\*</sup>
- 48% of Monterey County parents of children under 6 years old (and not in kindergarten) report a grandparent or family member as the only source of childcare (2015). <sup>xi</sup>
- 47% of working families with children aged 0 to 4 have access to part- or full-day licensed care (2014). <sup>xii</sup>
- 41% of children aged 3 to 4 have access to preschool (2014). <sup>xii</sup>
- 87% of adults expressed a desire for their children to attend some form of child care or preschool. Only half said their children were enrolled in such programs. The most cited reason for lack of attendance was financial concerns (2015). <sup>xi</sup>
- 28% of kindergarteners had the skills needed to be optimally ready for kindergarten (2015). <sup>xiii</sup>

individuals and society at large,” especially for under-resourced families. Dr. Heckman’s research shows that investments in quality, early childhood services can yield a 13% return on investment per child, per annum, through better education, economic, health, and social outcomes.<sup>vii</sup> A holistic approach to early development is key. Family engagement, parent/caregiver development, relationship-based, reflective interactions, and two-generation programs and services are effective approaches.

While awareness of early childhood’s importance has increased, practices and investment have not kept pace.<sup>viii</sup> Policy makers have a responsibility to lay the foundation and facilitate timely investments in early childhood by prioritizing our youngest residents.

### Policy Recommendation – Institutionalize Early Childhood Development Policies in General Plans



*Figure 2: Public Policies that affect early childhood development collectively overlap.*

True change does not happen in isolation. Factors that affect early childhood include health, nutrition, mental health, education, safety (family support and child protection), and family well-being. However, there are policy areas that also influence a child and their family’s ability to thrive, including housing, transportation, and economic development, particularly workforce development.

One method of influencing change in communities is strategic planning and a general plan. Early childhood policies in a general plan reveal a local government’s prioritization of the well-being of their children. Children and families live in dynamic environments and should be supported in integrated ways. To create supportive environments for children and families, non-profit organizations, government agencies, private sector businesses, faith-based communities, and schools need to incorporate early childhood development in all aspects of the community.

### What is a general plan?

A general plan is a broad document that guides a city or county’s direction and priorities. The state of California requires that every city and county have a general plan to articulate its long-range goals “for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning” (Government Code §65300). Within each general plan, there are eight different “elements” defined by the state as land use, housing, circulation, conservation, noise, safety, open space, and environmental justice.<sup>ix</sup> The general plan must also incorporate 4 components: (1) vision, (2) goals, (3) objectives, (4) policy, and (5) implementation measures for their communities. Although there are required elements, a community can adapt the required elements to meet its specific needs.

Intentionally adding early childhood policies in all elements of a general plan, including additional ones guided by the community, highlights the importance of early childhood, prioritizes childhood development, and opens early childhood programming and services to additional resources. Early childhood policies can be integrated within each element to call for implementing high quality programs and building collaborative partnerships. Policies in a general plan can guide a community's budget, influencing the expansion or development of early childhood programs and allowing opportunities to leverage monies with other funding sources.

San Mateo County adopted early childhood policies in several cities' general plans. For instance, the city of San Mateo included the need for quality child care programs and facilities in its 2010 General Plan. Since then, staff proposed to city council the development of new child care facilities. The city also implemented a Developer Impact Fee that raised, so far, \$1.2 million in revenue. With these funds, city staff set the goal of expanding the number of child care spaces in the community and implementing programs with little to no increase in administrative costs. It is anticipated that this revenue will create up to 90 new child care spaces, with the hope of increasing that number in the future.

Without similar, consistent commitment to quality early childhood settings, children will enter kindergarten already behind, and, by 3<sup>rd</sup> grade, will struggle even more. San Mateo's dedication to quality early childhood is reflected in data. Half of the county's children are reading proficiently by 3<sup>rd</sup>, in comparison to Monterey County's 28%<sup>xv</sup>. This indicator cannot be completely attributed to a county or city's general plan. However, a community's understanding of the individual and collective power between non-profits, businesses, schools, and government to holistically support children and families contributes to enabling all children to be prepared for success today and later in life.

Good intentions do not create an effective general plan that addresses early childhood. For example, a community in Monterey County incorporated early childhood development policies for child care in their general plan, yet these were not impactful to children and their families. While the child care policies were approved and adopted, implementation lacked actions that should have guided city staff on how to carry them out. Lack of city council members monitoring progress added further challenges. As a result, city government did not prioritize implementing early childhood development policies. Simultaneously, residents did not call attention to these oversights.

Authentic community voice and engaging constituents in a commitment to early childhood development policies are important components to long-term success. Early childhood advocates have an important job in general plans—to provide input about needs and hold their elected officials and government staff accountable. Communities can make sure that decision makers stay informed on relevant early childhood issues and policies by attending public meetings and speaking during public comment sessions, participating in public input meetings,

and completing surveys. Government staff and elected officials can hold each other accountable by creating a system to track and monitor progress on policy implementation.

Several communities in Monterey County recognized the power of early childhood policies in their general plans. At the time of this policy brief, several communities were reviewing goals, policies, objectives, and implementation measures (Appendix A).

## **Imperative Policies and Implementation**

It is imperative that local elected officials be at the forefront of supporting early childhood development. The following is a sample recommendation for early childhood policies in general plans and implementation actions. For a longer list of recommendations for each element, see Appendices B through H.

### **LAND USE**

**Goal:** Available quality child care for all community members.

**Objective:** Ensure there is enough quality childcare for children 0-5 years old.

Policy: **Develop Quality Child Care Space** – Facilitate and promote the development of quality childcare spaces in areas and acknowledge that the provision of such facilities is a community goal.

**Implementation Action** – **Available Inventory** Review unused public and private locations for potential conversion into child care sites and identify available funding for the effort.

**Implementation Action** – **Partnerships** Encourage the use of public facilities for child care services, including collaboration between schools and parks, faith-based institutions, community centers, libraries, and senior centers.

## **Conclusion**

Supporting early childhood development enriches the well-being of a community both socially and economically. While legislative efforts take place at the national and state level, local policy can occur concurrently. By inserting early childhood development policies in general plans, local governments demonstrate that they prioritize the needs of all children and all families. This action creates more opportunities to ensure access to affordable, high quality early care and education and ensures more children enter school ready to learn. It further improves workforce development and allocates much-needed additional resources for services. Government at all levels should not forget their youngest residents when planning, their future—and our future—depends on it.

## Authors

---

**Amanda Mihalko**  
[Amanda.Mihalko@gmail.com](mailto:Amanda.Mihalko@gmail.com)  
831-241-1539

**Darlene Coronado**  
Preparing for Success  
[dcoronado2009@gmail.com](mailto:dcoronado2009@gmail.com)  
831-905-8672

**Nina Alcaraz**  
First 5 Monterey County  
[nina@first5monterey.org](mailto:nina@first5monterey.org)  
831-444-8549 ext. 11

**Janeth Rojas**  
Child Care Planning Council  
Quality Matters  
Monterey County Office of  
Education  
[jarojas@montereycoe.org](mailto:jarojas@montereycoe.org)  
831-784-4141

## Sponsored by

---

*the* **WOMEN'S  
FOUNDATION  
of CALIFORNIA**

## References

---

- <sup>i</sup> Key Concepts: Brain Architecture. Center for the Developing Child, Harvard University.  
<http://developingchild.harvard.edu/science/key-concepts/brain-architecture/>. Retrieved May 1, 2016.
- <sup>ii</sup> American Edge, Rand Corporation, American Institute for Early Education and Research
- <sup>iii</sup> Loeb, Susanna. Economics of Education Review. How Much is Too Much? The Influence of Preschool Centers on Children's Social and Cognitive Development. Volume 26, Issue 1, pp52-66, February 2007. And: Child Trends. Quality Dosage, Thresholds and Features in Early Childhood Settings: A Review of the Literature. Administration for Children and Families, US Depart. Of Health and Human Services. August 2010.
- <sup>iv</sup> Child Trends Data Bank. Early School Readiness: Indicators of Child and Youth Well-Being. July 2015
- <sup>v</sup> First 5 Monterey County. Full Report 2015: Ready for Kindergarten, Ready for Life: An Exploration of the School Readiness of Monterey County's Children. Harder+Company. May 2016.
- <sup>vi</sup> Annie E. Casey Foundation. Double Jeopardy: How Third Grade Reading Skills and Poverty Influence High School Graduation. January 2012.
- <sup>vii</sup> The Heckman Equation. <http://heckmanequation.org/about-professor-heckman> . Retrieved May 1, 2016.
- <sup>viii</sup> Olson, Steve. The Committee on From Neurons to Neighborhoods Anniversary Workshop. From Neurons to Neighborhoods: An Update. Institute of Medicine and National Research Council of the National Academies. 2012.
- <sup>ix</sup> "[State of California: General Plan Guidelines](#)". The Governor's Office of Planning and Research. State of California. Retrieved August 28, 2017
- <sup>x</sup> American Community Survey B09001. Retrieved March 2016.
- <sup>xi</sup> Impact Monterey County. Impact Monterey County Community Assessment: Adult Experiences and Aspirations. Institute for Community Collaborative Studies. May 2015.
- <sup>xii</sup> California Child Care Resource & Referral Network, California Child Care Portfolio, 2015
- <sup>xiii</sup> First 5 Monterey County. Full Report 2015: Ready for Kindergarten, Ready for Life: An Exploration of the School Readiness of Monterey County's Children. Harder+Company. May 2016.
- <sup>xv</sup> Kidsdata.org. Students Meeting or Exceeding Grade-Level Standard in English Language Arts (CAASPP), by Grade Level. 2016.



## APPENDIX A

### CALENDAR OF GENERAL PLANS IN MONTEREY COUNTY

	Link to General Plan	Date of Most recent plan	Scheduled to update again	Status of ECE in general plan
Monterey County	<a href="http://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan/final-version-of-the-monterey-county-general">http://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency-rma-/planning/resources-documents/2010-general-plan/final-version-of-the-monterey-county-general</a>	October 2010	2020	None
Carmel	<a href="http://ci.carmel.ca.us/carmel/index.cfm/search-results/?keywords=general+plan&amp;display=search&amp;newSearch=true&amp;noCache=1">http://ci.carmel.ca.us/carmel/index.cfm/search-results/?keywords=general+plan&amp;display=search&amp;newSearch=true&amp;noCache=1</a>	June 2003	2023	None
Del Rey Oaks	<a href="https://www.delreyoaks.org/general-plan.htm">https://www.delreyoaks.org/general-plan.htm</a>	January 1997	Unknown	None
Gonzales	<a href="http://www.ci.gonzales.ca.us/planning.php">http://www.ci.gonzales.ca.us/planning.php</a>	2010	2017 addition of Health Element	Proposed language in Health Element with thoughts to expand throughout general plan
Greenfield	<a href="http://ci.greenfield.ca.us/Search?searchPhrase=general%20plan">http://ci.greenfield.ca.us/Search?searchPhrase=general%20plan</a>	2005	2025	None
King City	<a href="http://www.kingcity.com/city-departments/community-development-department/general-plan-housing-element/">http://www.kingcity.com/city-departments/community-development-department/general-plan-housing-element/</a>	November 1998	Unknown	None
Marina	<a href="http://www.ci.marina.ca.us/Search?searchPhrase=general%20plan&amp;page=1&amp;perPage=10">http://www.ci.marina.ca.us/Search?searchPhrase=general%20plan&amp;page=1&amp;perPage=10</a>	October 2000 with amendments through 2010	Unknown	Land Use Element
Monterey	<a href="http://www.monterey.org/Portals/0/Policies-Procedures/Planning/GeneralPlan/16_0323-General-Plan.pdf">http://www.monterey.org/Portals/0/Policies-Procedures/Planning/GeneralPlan/16_0323-General-Plan.pdf</a>	January 2005 with amendments March 2016	Unknown	None
Pacific Grove	<a href="https://www.cityofpacificgrove.org/living/community-economic-development/planning/general-plan">https://www.cityofpacificgrove.org/living/community-economic-development/planning/general-plan</a>	1994	Unknown	None
Salinas	<a href="https://www.cityofsalinas.org/sites/default/files/departments_files/community_development_files/general_plan_files/generalplan.pdf">https://www.cityofsalinas.org/sites/default/files/departments_files/community_development_files/general_plan_files/generalplan.pdf</a>	September 2002	Alisal Vibrancy Plan Element 2017	None
Seaside	<a href="http://www.ci.seaside.ca.us/Search?searchPhrase=general%20plan">http://www.ci.seaside.ca.us/Search?searchPhrase=general%20plan</a>	August 2004	In process 2017	Proposed language in draft throughout general plan
Soledad	<a href="http://ci.soledad.ca.us/Search?searchPhrase=general+plan&amp;page=1&amp;perPage=10">http://ci.soledad.ca.us/Search?searchPhrase=general+plan&amp;page=1&amp;perPage=10</a>	September 2005	Unknown	None

---

## APPENDIX B

### HEALTH

A Health Element is an optional element for most general plans. Healthy community design bridges together planning activities (including land use, economic development, and infrastructure) to establish a strong tie with health-related items, including but limited to increasing the public's perception of safety, social support and cohesion, and livable complete communities. A healthy community will bring many benefits to a community, from better physical and emotional health to economic investments. Implementing these determinants can also help promote equity and community development over the long term.

---

**Goal:** Enhance educational attainment and employment readiness

**Objective:** Ensure early childhood supports are available to the community

#### EARLY CHILDHOOD EDUCATION

**Policy: Affordable and Quality Preschool and Head Start**

Support the development of affordable and accessible, quality early child care, preschools and Head Start programs to increase and promote early learning.

Implementing Action – **Cross-Agency Work** Develop childcare facilities through collaborative work among multiple city and county agencies and initiatives (ex: cradle to career initiatives).

Implementing Action – **Growth and Expansion** Promote mixed-use permits that will allow for inclusion of childcare facilities and preschools in residential neighborhoods and expansion of early learning facilities as part of the city's growth.

Implementing Action – **Facility Space** Explore ways of utilizing existing school, private, and commercial facilities for non-school related and child care activities, and advocate for the inclusion of early learning spaces in both the planning of new facilities and for the expansion of existing school facilities.

Implementing Action – **City Childcare Subsidies** Develop a subsidy program to support family access to quality local childcare.

---

**Policy: Early Childhood Development Partnerships**

Develop an education system that supports accessible early childhood education programs that provide all children with a foundation to become happy, healthy and successful.

Implementing Action – **Year-Round Enrichment Programs** Develop or continue collaboration with School Districts and public/private partnerships to maintain and enhance existing extended learning opportunities through after-school enrichment programs, summer boost programs, school breaks, and weekends for all children, especially low to moderate income families and English language learners.

Implementation Action – **Licensed Childcare Providers** Work with local institutions of higher education and the Child Care Resource & Referral agency to coordinate and expand professional development pathways for residents to become licensed childcare providers.

Implementing Action - **Family Strengthening** Through community events, provide families with practical ways to support their children, including resources on social-emotional development, extending learning into the home, and successful transitions into and out of pre-K. Ensure that all children gain foundational language, cognitive and social emotional skills, including students with special needs and children whose primary language is not English. Incorporate family strengthening messaging into social marketing campaigns.

Implementing Action – **Needs Assessment** Complete a child care nexus study to determine the extent of need for early childhood education and care programs within the community and expenses related to expansion of quality programs. Explore avenues to implement a systematic way to monitor and evaluate this on a periodic basis, developing mechanisms for gathering regular feedback from families on all aspects of programming and using those findings to inform ongoing improvements.

**Policy: Support of Early Childhood Education**

Promote community health and well-being through the promotion and support of early childhood education in collaboration with public and private entities.

Implementing Action - **Recreation Support** Partner with parks to develop parent-child playgroups that support all areas of child and parenting development.

Implementing Action – **Information Campaign** Promote significant benefits of quality early childhood education to community members, employers, businesses and developers through social marketing campaigns.

---

Implementing Action - **Community Engagement** Intentionally use community space to partner with local agencies to host workshops for parents on building early literacy skills.

#### CHILDCARE SERVICES

Policy: **Increase and Maintain Childcare Services**

Support the expansion of affordable, high quality child-care, and early learning options for working parents.

Implementing Action – **Year-Round Enrichment Programs** Increase collaboration with school districts and public/private partnerships to maintain and enhance existing extended learning opportunities through after-school enrichment programs, summer boost programs, school breaks, and weekends for all children.

Implementation Action – **Licensed Childcare Providers** Work with local institutions of higher education and the Child Care Resource & Referral agency to coordinate and expand professional development pathways for residents to become licensed childcare providers.

Implementing Action – **Facility Development** Streamline processing and permit regulation to the extent possible to promote and support the development of childcare facilities and family child care homes. Review zoning regulations regarding home-based early childhood education facilities for areas that can be streamlined.

Implementing Action – **Support License-Exempt Child Care** Create network of family, friend and neighborhood (FFN) caregivers to form a peer learning playgroup for information and strategy sharing. The playgroup will serve as an important strategy to achieve FFN caregivers feeling competent, well-informed, and capable of supporting the children to become happy, healthy and successful.

Policy: **Livable Communities**

Encourage childcare to be located strategically to support workforce and livable communities.

Implementation Action – **Future Development** Encourage developers and larger commercial employers to provide on-site childcare or to cluster public uses such as schools, early education centers, parks, libraries, and community activity centers around sites of development.

Implementation Action – **Inclusion in New Developments** New developments having more than 50 housing units or 50,000 square feet of commercial or industrial space shall prepare a Child Care Facilities Needs Assessment. The purpose is to assess new

---

childcare demand created by new residents and employees against available community resources.

Implementation Action – **Permits** Ensure Local City Permits Department inform new developments of this policy to ensure they meet this requirement.

Implementation Action – **Permits and Zoning** Ensure staff issuing permits are knowledgeable of policy which would require them to include a child care facility, community space, green space, etc. in new development or proposal for mixed-use space prior to permits being issued and approved.

Implementation Action – **Childcare Land Trust** Explore possibility of establishing a childcare land trust that reserves land and space for community uses such as early childhood education.

Policy: **Childcare Delivery Services**

Develop a comprehensive child care delivery system.

Implementation Action – **Childcare Task Force** Join a community-wide child care task force (or council) to study the development of childcare programs, fill service gaps, increase program effectiveness, improve service accessibility, and maximize available resources.

Implementation Action – **Childcare Master Plan** Create a joint public/private childcare master plan that will coordinate a range of services for children and their families, in conjunction with local agencies, groups, and larger county initiatives.

Implementation Action – **Childcare Trust Fund** Establish a Childcare Trust Fund under the direction of the Childcare Task Force with an emphasis on fundraising for capital projects and seed money for new programs.

---

## APPENDIX C

### LAND USE

The Land Use element is a system for classifying and designating the appropriate use of properties. It functions as a guide to planners, the public, and decision makers as to the ultimate pattern of development for the city or county as it grows. Land use plays a central role in correlating all land use issues into a set of coherent development policies. The land use element has a pivotal role in zoning, subdivision, and public works decisions. Recommendations provided could be inclusive of Land Use, Facilities, and other pertinent general plan elements.

**Goal:** Available quality child care for all community members.

**Objective:** Ensure there is enough available quality childcare for children.

Policy: **Develop Quality Child Care Space**

Facilitate and promote the development of quality child care spaces in all areas and acknowledge the provision of such facilities as a community goal.

To the greatest extent possible, schools should be utilized for after school programs whether operated by the school district or an outside entity.

Actively support efforts to develop child care facilities for downtown employees, shoppers, and visitors.

Implementation Action – **Available Inventory** Review unused public and private locations for potential conversion into child care sites and identify available funding for the effort.

Implementation Action – **Partnerships** Encourage the use of public facilities for child care services, including collaboration between schools and parks, faith-based institutions, community centers, libraries, and senior centers.

**Goal:** To develop a comprehensive child care delivery system that builds child care services into the fabric of community development.

**Objective:** Create a complete community with the inclusion of child care.

Policy: **Complete communities**

Promote health for all communities in the city/county, with attention to those that have been identified as lacking in amenities such as transit, clean air, grocery stores, bike lanes, parks, child care, education, health care and other components of a healthy community.

---

Establish activity centers within or near residential neighborhoods that contain services such as child or adult-care, recreation, public meeting rooms, convenient commercial uses, or similar facilities.

Within residential districts, land uses that have historically been in residential neighborhoods and which, by design, can be made compatible with the purpose and character of the residential classification should continue to be allowed. These other land uses include, but are not limited to, small child care facilities for children, group and residential care homes of six or fewer persons, schools, and parks.

Where appropriate, design communities with a balanced mix of uses (shopping, residential, child care) that provide regional transportation facilities within walking distance.

Implementing Action – **Year-Round Enrichment Programs** Increase collaboration with school district and public/private partnerships to maintain and enhance existing extended learning opportunities through after-school enrichment programs, summer boost programs, school breaks, and weekends for all children.

Implementation Action – **Licensed Childcare Providers** Work with local institutions of higher education and the Child Care Resource & Referral agency to coordinate and expand professional development pathways for residents to become licensed childcare providers.

Implementing Action – **Facility Development** Streamline processing and permit regulation to the extent possible to promote and support the development of childcare facilities and family childcare homes. Review zoning regulations regarding home-based early childhood education facilities for areas that can be streamlined.

Implementation Action – **Information Sharing** Host community conversation around current city regulations with city officials.

Implementing Action – **Support License-Exempt Child Care** Create network of family, friend and neighborhood (FFN) caregivers to form a peer learning playgroup for information and strategy sharing. The playgroup will serve as an important strategy to achieve FFN caregivers feeling competent, well-informed, and capable of supporting the children to become happy, healthy and successful.

---

**Goal:** To encourage the development of child care (both family child care home and child care centers) within new development centers (residential or business).

**Objective:** Ensure new development accounts for early childhood care.

Policy: **New growth**

Encourage the inclusion of child care facilities as part of the city's growth and to address existing demand.

Encourage retention of existing and development of new commercial uses that primarily are oriented to the residents of adjacent neighborhoods and promote the inclusion of community services (e.g., childcare and community meeting rooms).

Encourage child-care facilities (both in home and center based care) in residential areas if there is sufficient available space for outdoor activity, and traffic, parking and noise are mitigated.

Implementation Action – **Early Education in Neighborhood Design** All new residential developments with 50 or more homes should address the need for child care resulting from the new growth and consider the inclusion of child care facilities as a component of their neighborhood design.

Implementation Action – **Child Care Needs Assessment** New developments having 50,000 square feet or more of commercial or industrial floor area shall prepare a Child Care Facilities Needs Assessment. The purpose is to assess new child care demand created by new residents and employees against available community resources and recommend methods to meet these child care needs.

Implementation Action – **Future Development** Encourage developers and larger commercial employers to provide on-site childcare or to cluster public uses such as schools, early education centers, parks, libraries, and community activity centers around sites of development.

Implementation Action – **Inclusion in New Developments** New developments having more than 50 housing units or 50,000 square feet of commercial or industrial space shall prepare a Child Care Facilities Needs Assessment. The purpose is to assess new childcare demand created by new residents and employees against available community resources.

Implementation Action – **Permits** Ensure Local City Permits Department inform new developments of this policy to ensure they meet this requirement.

Implementation Action – **Permits and Zoning** Ensure staff issuing permits are knowledgeable of policy which would require them to include a child care facility,



---

community space, green space, etc. in new development or proposal for mixed-use space prior to permits being issued and approved.

Implementation Action – **Incentives** Study and adopt development guidelines that establish incentives for inclusion of public amenities, including child care facilities.

**Goal:** To streamline the facility development process.

**Objective:** Easier access for child care providers to do business within the community.

**Policy:** **Early Child Care Regulation and Permitting**

Reduce regulatory and other barriers to quality early care and education facilities.

Cooperate with the region's cities to draft a model ordinance or procedure for the processing of permits for child care facilities and to work with the region's cities to develop uniform zoning policies regarding location, parking and other requirements.

Implementation Action – **Permit Process** Streamline processing and permit regulation to promote the development of child care facilities.

Implementation Action – **Permits and Zoning** Ensure staff issuing permits are knowledgeable of policy which would require them to include a child care facility, community space, green space, etc. in new development or proposal for mixed-use space prior to permits being issues and approved.

Implementation Action – **Provider Assistance** Where feasible, make underutilized properties or low-cost loans available to child care providers, particularly for those child care facility types of greatest need, center or home based providers.

Implementation Action – **Information Sharing** Assist in the development of such programs by providing child care providers with information and assistance in obtaining space for early childhood care and education. Hold meeting(s) where current child care providers can offer their expertise on local regulations along with officials and what additional regulations would be necessary.

Implementation Action – **Code Enforcement** Have a Code Enforcement staff member hold informational meetings when potential new providers are going through the permitting process to ensure follow-through of city regulations.

Implementation Action – **Inspection** Schedule inspections with child care facilities at least 1 time per year.

---

**Goal:** Enhance early education.

**Objective:** Increase awareness and support of quality early education.

Policy: **Support early education**

Encourage employers to support child care for their employees with family friendly policies.

Ensure that all households have access to a sufficient supply of quality early care and education and supervised school-age enrichment options for children.

Implementation Action – **Promote Benefits** Reserve and pay (in full or in part) for child care spaces with a provider near the worksite, offer Dependent Care Flexible Spending Accounts or “cafeteria plan” benefits, and enter a consortium with other employers to provide an on- or near-site child care center.

Implementing Action – **Recreation Support** Partner with parks to develop parent-child playgroups that support all areas of child and parenting development.

Implementing Action – **Information Campaign** Promote significant benefits of quality early childhood education to community members, employers, businesses and developers through social marketing campaigns.

Implementing Action – **Community Engagement** Intentionally use community space to partner with local agencies to host workshops for parents on building early literacy skills.

**Goal:** Make land available for early childhood activities.

**Objective:** Set aside land for early childhood care and education.

Policy: **Land Designation**

Land shall be reserved for community uses such as private schools, membership organization, child care centers, and senior centers.

Implementation Action – **Childcare Land Trust** Explore possibility of establishing a childcare land trust that reserves land and space for community uses such as early childhood education.

---

## APPENDIX D

### ECONOMIC DEVELOPMENT

Child care businesses contribute to the local economy. Quality child care promotes school readiness and ultimately a better workforce and productive citizens. Child care services attract and retain business and employees. Quality child care supports work/life balance and increases job loyalty and satisfaction. To develop and maintain livable communities, child care must be included in growth plans to encourage families to move to and remain in these local communities.

**Goal:** Increase the amount of quality childcare facilities.

**Objective:** To create incentives for developing child care facilities.

Policy: **Incentives to developers and businesses**

The City shall develop a formula for granting a bonus in density or intensify use for commercial, industrial, and residential projects (of specific sizes) that provide quality child care facilities.

Implementation Action – **Incentives** Review availability and provide incentives for building projects and new employment centers that include quality childcare facilities.

Implementation Action – **Mixed Use Space** Promote and permit mixed land use, including quality childcare centers in residential neighborhoods.

Implementation Action – **Expand Quality Childcare Facilities** Build relationships and collaborate with businesses, schools, and public/private partners to expand or develop childcare facilities.

**Goal:** Create an economic climate conducive to attracting new development and businesses which yield net social and economic benefits to the community.

**Objective:** Enable residents to prosper through employment with supports with quality child care services.

Policy: **Employment Opportunities**

Recognizing that working parents need affordable and available child care to enter and remain in the workforce, the City/County supports the provision of quality child care services in proximity to jobs.

Maintain and improve the City/County's strong, diversified economic base and provide for a wide range of employment opportunities and support services, such as job training and child care.

---

Work to remove impediments to gainful employment, such as lack of transportation, child care, job training, vocational education, and other factors.

Encourage the development of quality childcare facilities that support working parents.

Implementation Action – **Land Availability** Ensuring adequate land is available, with appropriate zoning, to encourage childcare centers in residential neighborhoods.

Implementation Action – **Expand Childcare Options** Establishing relationships with private businesses, schools, and other public and private entities to create more childcare facilities.

Implementation Action – **Incentives** Review availability and provide incentives for building projects and new employment centers that include childcare facilities.

Implementation Action – **Mixed Use Space** Promote and permit mixed land use, including childcare centers in residential neighborhoods.

**Goal:** Encourage quality child care to be located strategically to support workforce and livable communities.

**Objective:** Transportation efforts promoting childcare centers close to employment and home.

Policy: **Mixed Use Space**

Encourage community-serving uses, such as child care centers and personal services, to be in proximity to employment centers, at community and regional centers, near transportation facilities, in or adjacent to public parks and schools, and along the mixed-use corridors.

Encourage the inclusion of child care facilities in commercial and residential areas, near transportation facilities and in or adjacent to public parks and schools to provide a needed service to working parents and a benefit to the community.

Encourage developers of larger commercial and office projects to provide for on-site ancillary uses that would allow employees and residents to make non-work related trips (e.g., banking, lunch, dry cleaning, recreation, child care) without having to use their automobiles.

Implementation Action – **Mixed Use Space** Promote and permit mixed land use, including childcare centers in residential neighborhoods.

Implementation Action – **Promote Benefits** Promote significant benefits of quality childcare to citizens/employment centers/developers through public service announcement/social media/local publications campaigns.

---

Implementation Action – **Incentives** Review availability and provide incentives for building projects and new employment centers that include childcare facilities.

---

## APPENDIX E

### OPEN-SPACE

The Open-Space element guides the comprehensive and long-range preservation and conservation of open-space land, which is defined in statute as any parcel or area of land or water that is essentially unimproved and devoted to open-space use. This element has a broad scope and overlaps with several elements including Land Use, Conservation, Safety, Health, and Environmental Justice.

**Goal:** Increase early learning opportunities.

**Objective:** Provide early learning opportunities throughout the community.

Policy: **Recreational and Library Services**

Develop parks, recreational, and library programs that promote early learning opportunities for children.

Encourage joint-use agreements with school districts that allow school properties to be used during non-school hours.

Implementation Action – **Physical Structures** Ensure that parks include play areas that are developmentally appropriate for children ages 0-5.

Implementing Action – **Recreation/Library Support** Partner with parks and libraries to develop playgroups that support all areas of child development. Utilize existing partnerships of cradle to career initiatives to determine best practices of early childhood education delivered in playgroup models and ways to incorporate in groups.

Implementing Action – **Information Campaign** Promote significant benefits of quality early childhood education to community members, employers, businesses and developers through social marketing campaigns.

Implementing Action – **Community Engagement** Intentionally use community space to partner with local agencies to host workshops for parents on building early literacy skills.

---

**Goal:** Utilize open/park Space for early learning.

**Objective:** Encourage child care providers to utilize open/park space.

Policy: **Use of Open-Space**

Maximize the use and productivity of parks and recreation facilities by encouraging childcare facilities to be located adjacent to or nearby, allowing children who are under care and supervision to use the public space.

When planning communities, encourage the location of parks near other community facilities such as schools, senior centers, recreation centers, etc.

Require that development of parks, trails, and open-space facilities occur concurrently with other areas of development.

Implementation Action – Promote the use of community open-space and parks to child care providers through community conversations and informational sessions. Encourage the expansion of facilities and amenities in existing parks. Include map of city parks through public websites and in any information provided to childcare facilities interfacing with permitting office.

Implementation Action – Increase access to open-space resources by locating parks near homes and offices.

**Goal:** Understand relationship between open-space and child care

**Objective:** Include open-space in the development of larger child care planning documents.

Policy: **Create a joint public/private Child Care Master Plan and Child Care Trust Fund.**

Implementation Action – **Child Care Task Force** Create a community-wide child care task force (or council) to study the development of child care programs, to fill service gaps, increase program effectiveness, improve service accessibility, and maximize all available resources in the community.

Implementation Action – **Child Care Master Plan** Create a joint public/private child care master plan that will coordinate a range of services for children and their families, in conjunction with local agencies and groups.

Implementation Action – **Inventory and Repurpose Space** Review unused public and private facilities in the city (including open-space, parks, etc.) for potential renovation or use as child care sites.

---

## APPENDIX F

### HOUSING

The Housing Element addresses the provision of safe, affordable housing for existing and future community residents. The Housing Element is designed to meet the statewide goal of providing a home and suitable living environment for all Californians. It is also designed to meet local and regional goals for maintaining and improving the quality of life by making housing accessible to people of all ages, incomes, races, and physical capabilities.

**Goal:** Encourage communities to co-locate child care and other human services near homes, community centers, and transportation.

**Objective:** To provide social services at affordable housing locations.

**Policy: Housing-Community Partnership**

The City/County shall encourage the co-location of childcare, disabled, mentally-disabled, and elderly facilities compatible with the needs of residents and land use patterns; and encourage such facilities to be located near homes, schools, community centers, recreation, facilities, and transit hubs.

Incorporate child care and social services into affordable housing. Work with non-profit housing developers who build affordable housing to address any special needs of farm workers, such as on-site child care and community rooms. Encourage development of recreational centers to serve all phases of life (e.g. children, families, and senior citizens).

Implementation Action – **Intergenerational Facilities** Promote intergenerational community facilities. Senior centers and child-care facilities with the appropriate arrangements shall bring children and seniors together in new developments to maximize opportunities for innovation and interactions.

Implementation Action – **Co-location of Services** Encourage co-location of childcare services with other human services system that focus on the whole person. Expansion of partnerships, new equipment or renovations to facilities may be needed to help families struggling with adverse factors. Create a welcoming, friendly reception, and include private meeting spaces for privacy protection.

Implementation Action – **Develop On-site Child Care** Encourage non-profit housing developers to provide on-site child care and community rooms for children and their families.



---

**Goal:** Develop, conserve and improve affordable housing.

**Objective:** Allow for the development, conservation, and improvement of affordable housing.

Policy: **Quality of Life**

Maintain the quality of life within neighborhoods by maintaining an adequate level of community facilities, such as child care centers and municipal services by encouraging the inclusion of space for child care in new housing developments, including affordable housing developments.

Implementation Action – **On-site Child Care** Encourage low-income housing to offer child care space on-site.

Implementation Action – **Assessment** Work with project applicants to evaluate the demand for child care in new housing developments.

Implementation Action – **Incentives** Establish and provide incentives for the inclusion of child care facilities in affordable housing projects.

**Goal:** Ensure affordable housing is available to all residents.

**Objective:** Consider the affordable housing needs of single-parent and female-headed households.

Policy: **Single Parent Household Support**

The City/County will ensure that affordable housing constructed or rehabilitated by the City/County meets the needs of single-parent households, especially female-headed households.

Single parent households with children have special housing needs, primarily because single-parent households tend to contribute a higher percentage of their income to housing costs and women continue to earn less than men in comparable jobs. Due to relying on one income, these families need lower cost housing in proximity to employment as well as access to affordable childcare.

Implementation Action – **Collaboration** Collaborative approach with multiple agencies to develop child care facilities, including the Childcare Planning Council, local child care providers, transportation, parks and recreation, neighborhood groups, Chamber of Commerce, etc.

---

Implementation Action – **Partnership** Coordinate services for children and their families in conjunction with local agencies and groups. Build and maintain relationships with child development resource agencies and organizations in networking, referral, and coordination of services.

Implementation Action – **Funding Assistance** Research and promote grants for parents to afford quality child care centers within the jurisdiction, and for small businesses that offer affordable housing.

**Goal:** Provide support for license-exempt providers.

**Objective:** Assess and research the establishment of licensing requirements for license-exempt providers.

**Policy: Licensed Exempt (Family, Friend, and Neighbor)** Explore licensing (or training/inspection) for all license-exempt providers.

Implementing Action – **Support License-Exempt Child Care** Create network of family, friend and neighborhood (FFN) caregivers to form a peer learning playgroup for information and strategy sharing. The playgroup will serve as an important strategy to achieve FFN caregivers feeling competent, well-informed, and capable of supporting the children to become happy, healthy and successful.

Implementation Action – **Assessment** Explore opportunities for a pathway to licensure for license-exempt providers.

Implementation Action – **Safety** Adapt fingerprinting and background check requirements to now include license-exempt providers.

Implementation Action – **Subsidies** Create a tiered-reimbursement system that ties higher rates of government subsidy or other financial support to licensing levels or training requirements.

---

## APPENDIX G

### ENVIRONMENTAL JUSTICE

The Environmental Justice Element addresses environmental justice concerns in communities. It includes the fair treatment and meaningful participation of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (Government Code §65040.12).

**Goal:** Reduce carbon footprint.

**Objective:** Reduce the number of trips in vehicles needed by residents.

**Policy: Smart Growth and Transit Oriented Development**

Commercial uses and services for employees and businesses (i.e. grocers, child care, dry cleaners, branch banks, etc.) shall be required, as a means of reducing trips and vehicle miles traveled.

Support research on the feasibility of locating child care centers at 'Park and Ride' sites, transit centers, or other locations accessible to public transportation.

When feasible, avoid locating new sources of air pollution near homes and other sensitive receptors, including early childhood learning facilities.

Implementation Action - **Future Development** Encourage developers and larger commercial employers to provide on-site childcare or to cluster public uses such as schools, early education centers, parks, libraries, and community activity centers around sites of development.

Implementation Action – **Mixed Use Space** Promote and permit mixed land use, including childcare facilities in residential neighborhoods and commercial areas to maximize existing structures.

Implementation Action – **Partnerships** Partner with parks and libraries to develop playgroups that support all areas of child development. Utilize existing partnerships of cradle to career initiatives to determine best practices of early childhood education delivered in playgroup models and ways to incorporate in groups.

---

## APPENDIX H

### CIRCULATION

The Circulation Element is an infrastructure plan addressing the movement of people, goods, energy, water, sewage, storm drainage, and communications. By law, the Circulation Element must correlate directly with the Land Use Element and has direct relationships with the Housing, Open-Space, Noise and Safety Elements. For communities who have additional elements, there may also be relationships with Health and Economic Development Elements.

**Goal:** To support child care facilities within transportation hubs.

**Objective:** Achieve support of child care facilities near transportation locations.

**Policy:** **Child care facilities near transportation locations.**

Support research on the feasibility of locating child care centers at 'Park and Ride' sites, transit centers, or other locations accessible to public transportation.

Coordinate with transportation service providers and transportation planning entities to address the location of civic uses such as schools and government buildings, commercial corridors, and medical facilities so that they are accessible by public transit.

Implementation Action – **Existing Facilities** Continue researching availability of facilities for child care purposes that are also near public transportation.

Implementation Action – **Needs Assessment** Determine the proximity of child care to transportation hubs. If a gap is discovered, support and advocate within the community to ensure that additional bus routes and stops are added.

Implementation Action – **Information Campaign** Develop content on city website that includes Access to Public Transportation in relation to the location of child care facilities.

Implementation Action – **Partnership with Transportation** Coordinate with transportation service providers and transportation planning entities to ensure that public transportation facilities are located a convenient distance from residential areas.

---

**Goal:** Develop livable communities that promote walkability.

**Objective:** Create opportunities to include basic needs into the development of complete communities.

Policy: **Complete Communities**

Coordinate the development of complete neighborhoods that provide for the basic needs of daily life and for the health, safety, and welfare of residents.

Promote services that enable residents to meet their daily needs without driving. Such services may include: shopping shuttles to nearby retail districts, child care and social services near residential areas, and mobile or virtual health clinics.

Implementation Action – **Service Proximity** Where appropriate, require neighborhood retail, child care, service and public facilities within walking distance of residential areas.

**From:** [Zeiger, Jillian](#)  
**To:** [Tanielian, Aline](#)  
**Cc:** [Thomas, Leelee](#)  
**Subject:** FW: Housing element policy suggestions for draft  
**Date:** Friday, June 10, 2022 11:12:18 AM  
**Attachments:** [Age Forward Housing Element Draft Policies for consideration. .docx](#)

---

Let's also put this in the comment folder.

Jillian Nameth Zeiger, AICP  
Senior Planner  
Housing & Federal Grants Division  
County of Marin

---

**From:** Robinson, Sara <SRobinson@marincounty.org>  
**Sent:** Friday, June 10, 2022 11:11 AM  
**To:** Zeiger, Jillian <JZeiger@marincounty.org>  
**Subject:** Housing element policy suggestions for draft

Jillian,  
When we last spoke I said I would send some policy suggestions. My timing to meet your May deadline was deterred by a conference in LA and then by finding out that Lee was in Italy for 3 weeks. He is back and has finally reviewed these and agrees that I should send them on to you.

I also reviewed them with Linda Jackson to find that we are both on the same page and that she has already submitted some similar suggestions. You will find some new ideas for the draft or for implementation below.

I submit these as part of the Age Forward County Initiative. They are below and attached.

Thank you for all of your Element work. Looking forward to the meeting next week.

Sara

Age Forward Policy suggestions for CDA/Element process

- i. Provide incentives for developers to create congregate, multifamily, or cohousing
- ii. Consideration of a shallow subsidy program to help housing-insecure or recently homeless older adults transition into stable housing by providing direct financial assistance to address their unique needs, challenges, and barriers. (Possible funding AB2547, time-limited for transportation, move-in costs, rental assistance, security deposit.).
- iii. Consideration of a Visitability design ordinance
- iv. Offer streamlined and more affordable home modification permitting and review policy for 60+ residents.
- v. Consider creating permanent funding streams through zero and low-interest

modification loans for reasonable home modification programs to improve accessibility for property owners of 60+ renters not covered under the Fair Housing Act.

- vi. Consider low-cost construction loans for older homeowners that support the creation of affordable ADUs.
- vii. Implement zoning policies to accommodate more compact residential development near transit stops and in mixed-use, walkable communities—increasing accessibility for older adults who are unable or choose not to drive
- viii. Provide incentives to builders and municipalities to consider more senior housing options for those needing specialized care (memory care, residential care, assisted living, board and care)

## Age Forward Policy suggestions for CDA/Element process

Submitted by Sara Robinson, Age Forward Coordinator on June 10, 2022

- i. Provide incentives for developers to create congregate, multifamily, or cohousing
- ii. Consideration of a shallow subsidy program to help housing-insecure or recently homeless older adults transition into stable housing by providing direct financial assistance to address their unique needs, challenges, and barriers. (Possible funding AB2547, time-limited for transportation, move-in costs, rental assistance, security deposit.).
- iii. Consideration of a Visitability design ordinance
- iv. Offer streamlined and more affordable home modification permitting and review policy for 60+ residents.
- v. Consider creating permanent funding streams through zero and low-interest modification loans for reasonable home modification programs to improve accessibility for property owners of 60+ renters not covered under the Fair Housing Act.
- vi. Consider low-cost construction loans for older homeowners that support the creation of affordable ADUs.
- vii. Implement zoning policies to accommodate more compact residential development near transit stops and in mixed-use, walkable communities—increasing accessibility for older adults who are unable or choose not to drive
- viii. Provide incentives **to builders and municipalities to consider** more senior housing options for those needing specialized care (memory care, residential care, assisted living, board and care)





Monday, June 13, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Paul da Silva

### Community You Live In/Represent

Larkspur

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

pgsilva@sonic.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

196

### Comment or Suggestion

For Housing Goal 1, Policy 1.1,

"Efficient use of land" is vague, because use can be efficient with respect to many things. It could simply be generating the most money for a developer. If the plan really wants to promote sustainable development, it needs to be more specific about ensuring that projects must take into account the main three threats to sustainability today – loss of biodiversity, climate change, and pollution – as recognized by local, state, regional, national and international agencies

and organizations.

Better language would be “enact policies that help to reduce loss of biodiversity, climate change and pollution while fostering a range of housing types in our community.”



Monday, June 13, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Vivian Poole

### Community You Live In/Represent

Green Point/Black Point

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

vivianmpoole@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Dear Supervisors,  
While our state, county and community are in a drought and water shortage situation, I do not support building over 3,000 housing units anywhere in our County. There is just not enough water to support more households at this time. We have cut back as asked for several years and are still being asked to do more. Not flushing toilets, letting our gardens wither away, showering less, what more can we do? Please do not add to our community burden with more new housing.  
Respectfully,  
Vivian Poole Green Point Lane, Novato



Monday, June 13, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Robert Pendoley

### Community You Live In/Represent

Marin Environmental Housing collaborative

**Please select the best way to reach you in case there are questions about your submission**

Email

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Board of Supervisors  
3501 Civic Center Drive, Suite 329  
San Rafael, CA 94903

Dear Chairperson Rice and members of the Board:

The Marin Environmental Housing Collaborative (MEHC) is a multi-disciplinary consortium of advocates generating support for projects and policies that advance affordable housing, environmental integrity, and social justice. We are writing to support the draft 6th cycle Housing Element update.

The updated plan accurately assesses urgent housing needs and proposes programs with the potential to solve them. The planning process, including community out-reach and participation, has been transparent and thorough. The analysis

and policies proposals are comprehensive and, with follow through, will be effective. The comments in this note focus on specific land use proposals that we believe will support affordable housing production. In subsequent hearings we will comment on other important areas of the plan including policies to affirmatively further fair Housing and special needs.

Policies and programs in the draft Housing Element have the potential to promote affordable housing production. In particular, we support the following programs:

- Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss calls for rezoning/upzoning 109 parcels to accommodate 2677 homes. MEHC strongly urges that your Board commit to completing the rezoning process by January 31, 2023. This program also includes a proposal to add certainty to the planning and development process by revising the housing opportunity sites policy in the County Wide plan to specify allowable densities, minimum and maximum number of units, and objective design standards.
- Program 2: By-Right Approval states that per Government Code section 65583.2, sites identified for lower income housing in the 4th and 5th cycle Housing Elements shall be subject to by-right approval for projects that include 20 percent of the units affordable to lower income households. We support this policy and strongly urge that your Board extend by-right approval to projects that include 20 percent of the units affordable to homeowners at 60 percent AMI or to renters at 50 percent AMI; and 100 percent affordable projects on any Housing Element sites.
- Program 6: Efficient Use of Multi-Unit Land would require the County to set minimum densities for multi-family and mixed-use zoning districts. We

recommend a minimum density of 30 units per acre for these districts. Further, we support the proposal to create a residential combining district that allows for form-based objective development standards rather than discretionary review. Form based codes streamline the review and approval process and promote high quality design. Finally, we recommend that your Board revise this program to include developing a conventional multi-family zoning district.

- Program 8: Development Code Amendments would increase the height limit for mixed-use residential development to 45 feet. We concur with the analysis that finds this, along with the proposed 30 unit per acre density standard, will facilitate residential development.

Finally, we strongly support the proposed densities to accommodate lower income housing: 30 units per acre in the Baylands and City Centered Corridors and 20 units per acre within the Rural and Inland corridors. These densities would finally fulfill the promise of the then ground-breaking 1972 county General Plan, i.e., to concentrate housing opportunity along the 101 corridor and continuing to focus on agriculture and resource conservation in the county's interior and coast side.

Sincerely,

Board Chair



Monday, June 13, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Leah Tuffanelli

### Community You Live In/Represent

Greenpoint/Novato

**Please select the best way to reach you in case there are questions about your submission**

Phone

### Phone Number

(415) 246-2645

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

Table C, C-7

### Comment or Suggestion

Several parcels in the Greenpoint neighborhood have been removed from the inventory list dated April 27, such as an abandoned horse stable at 50 H Lane and other parcels at 618 and 654 Atherton Ave, but you have retained on the list 275 Olive Ave (Greenpoint Nursery) which is wetlands that have been filled. Your table even states that the lot is "wetlands". Why propose to develop sensitive land like wetlands when there is other land nearby which you once considered suitable? I also do not understand why 618 and 654 Atherton were once considered, but the adjoining neighbor

lots and those across the street on Atherton, which are essentially the same as 618 and 654 Atherton, were not considered? The policy rationale for site selection is explained in the plans posted online, but can you explain the application of the policy in actual site selection in this neighborhood?





Tuesday, June 14, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Robin Pendoley

### Community You Live In/Represent

San Rafael

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

rpendoley@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

50

### Comment or Suggestion

Affordable housing for the education workforce is essential for the quality of Marin County's schools, to advance racial and class equity in our community, and to improve environmental sustainability by reducing carbon emissions from commuting.

Marin Promise Partnership conducted a survey in Nov/Dec 2021 of 4000 members of Marin's education workforce, spanning early childhood educators through higher education. The survey produced 722 respondents – faculty, staff, and

administrators – at educational institutions across Marin with data reflecting their needs for affordable housing. Below are key findings from the survey:

- 57.5% or 1438 of the educators employed by the partner institutions either “probably” or “definitely” would be interested in rental housing at 30% below market rate. Of those, the demographic categories with the highest percentages:

- BIPOC respondents – 63.8%
  - 18-39 year old respondents – 65.4%
- Of those who probably or definitely would be interested, 30.84% have a one way commute longer than 30 mins and 30.6% live outside of Marin.

An important note about the survey data. Of those who responded they “probably” or “definitely” would NOT be interested in rental housing at 30% market rate, 40% of respondents said housing at this rate would still be too expensive.

While the average elementary teacher salary may be \$92,217, it's worth noting that many local districts anticipate significant retirements in the coming years as baby boomers leave the workforce. As a result, districts will need to recruit entry level education professionals who will be earning between \$55,000 and \$65,000 per year. This means young professionals with teaching credentials and Master's degrees will qualify for "Very Low Income" housing for the first 5 years of their careers. Given that the average teacher with a Master's degree has \$48,000 in student debt ([https://qctimes.com/opinion/columnists/column-help-teachers-drowning-in-debt/article\\_83d27c81-63d8-5ed0-b54a-533f5dc31305.html#:~:text=The%20average%20student%20loan%20debt,who%20hold%20federal%20student%20loans.](https://qctimes.com/opinion/columnists/column-help-teachers-drowning-in-debt/article_83d27c81-63d8-5ed0-b54a-533f5dc31305.html#:~:text=The%20average%20student%20loan%20debt,who%20hold%20federal%20student%20loans.) ), local districts will face serious challenges recruiting qualified applicants to teach in Marin County without the availability of quality affordable housing.



Tuesday, June 14, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Robin Pendoley

### Community You Live In/Represent

San Rafael

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

rpendoley@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

218

### Comment or Suggestion

Given the exceptional need for housing for the education workforce throughout the county (see copy of data provided in a previous comment below), Program 25: Incentives for Affordable Housing should be amended to specifically include supports to school districts to develop parcels in the unincorporated county as affordable educator housing. Support provisions should provide robust incentives and long term technical assistance that meets the needs of school district leadership to successfully develop housing in a reasonable timeframe that meets the

full range of their workforce housing needs (Very Low Income through Moderate Low Income). Given the time horizon for the development of any housing in Marin, districts need institutional support to make committing to a project of this sort feasible. Additionally, the development of affordable workforce housing specifically for the education workforce is likely to present less opposition from the community, as evidenced by the public support seen for the Oak Hill Village project.



Tuesday, June 14, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Luke Barnesmoore

### Community You Live In/Represent

Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

LBarnesmoore@FrontPorch.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

page 19 and page 32

### Comment or Suggestion

Home Match is excited to be included in the housing element plan! Home sharing is a viable, development-free solution that supports the county's efforts to address the affordable housing crisis. The Home Match team is looking forward to continuing our work of supporting community members through the home sharing process. For Home Providers, home sharing offers social and financial support and an opportunity for community members to support one another by offering an empty room to someone in need. For Home Seekers, home sharing provides a creative,

affordable housing option and the chance to build new social connections. Many Home Seeker participants are older adults who are being priced out of their communities and young professionals and students who want to live close to work.

The Home Match team is deepening its work in supporting the county in meeting its RHNA goals. The model we've developed for supporting the process of sharing a room in a home or apartment is helpful for individuals who may be nervous about renting an ADU on their property, as this process involves many of the same dynamics of shared space. We partnered with the City of Mill Valley to send our program materials to individuals who received permits to build an ADU in the hopes that knowledge of a trusted partner through renting an ADU would act as an incentive for Home Providers to rent their new units. For example, facing a slew of inquiries from Craigslist, having strangers visit your property, and then sharing your property with another individual can be daunting. Home Match can help ease someone's concerns around renting their ADU and provide support around best practices. Home Match is ready to support the Marin County community through this process as we strive to meet our RHNA goals through ADU development!

June 22<sup>nd</sup>, 2022



Protecting Marin Since 1934

Marin County Community Development Agency  
Planning Division - Housing  
3501 Civic Center Drive  
San Rafael, CA 94903  
Attn: Leelee Thomas and Tom Lai

Via Email: [lthomas@marincounty.org](mailto:lthomas@marincounty.org); [tlai@marincounty.org](mailto:tlai@marincounty.org)

**Subject: Marin County Draft Housing & Safety Elements**

Dear Ms. Thomas and Mr. Lai:

Thank you for the opportunity to review and submit comments on the Marin County Draft Housing & Safety Elements. Marin Conservation League (MCL) acknowledges that these documents are critical and important in this pivotal time of balancing the need for housing and the growing consequences of climate change. MCL would like to thank County staff for completing and releasing these documents in tandem, as a number of the goals, policies and programs in each element have a direct or indirect linkage.

MCL has reviewed these draft elements for alignment with its adopted policy positions on, among others, housing, flooding/sea level rise, and wildfire management. Further, these draft elements have also been reviewed for alignment with MCL's longstanding mission, which is, *"To preserve, protect and enhance the natural assets of Marin in a changing environment."* With this, MCL respectfully submits the following comments.

**Draft Housing Element**

MCL is an environmental organization, and housing is not its principal focus. Nonetheless, MCL follows its current policy position on housing, which is to: a) support a balance of commercial development and workforce employment with needed housing; b) avoid sprawl; c) correspond to the service capacity of Marin's infrastructure; and d) protect specific areas of environmental importance. As a result of the State's housing crisis, in the past five years there have been dramatic changes in mandated housing laws to promote housing development. These new laws prescribed public review processes that promote streamlining and "by-right" (ministerial) permitting processes. To fully understand these new housing laws, in January 2022, MCL hosted "After Hours Event – The Impacts of the New State Housing Laws." This event was intended to educate interested attendees on the recent State housing laws and how they affect the review and development of housing at a local level in Marin County. Consequently, with the many changes in the housing laws,

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |  
[mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

MCL is in the process of updating its housing policy position. The following comments combine MCL's current position on housing with consideration of the recent changes in State housing law:

1. Format. MCL applauds County staff for the format and organization of the draft element, which is comprised of numerous documents covering specific topic areas. The organization of the documents makes the read easy to follow from the Needs Assessment through to the Sites Inventory (Appendix C).
2. Needs Assessment. The Needs Assessment is telling, as it confirms that the greatest housing need is for the low-, very low-, and extremely low-income households. These income levels support a high percentage of Marin's workforce that is required to travel far for affordable housing. Planning for housing opportunities to accommodate these households will promote a more sustainable balance in jobs and housing within the County, which will help address the impacts of climate change.
3. Constraints Analysis. The Constraints Analysis is comprehensive and well written. It includes and acknowledges environmental resources and challenges such as stream conservation, flooding/sea level rise, and fire hazards. It is recommended that the Appendix C- Sites Inventory table be revised to include known environmental conditions and constraints for the individual sites. Adding this information to the Sites Inventory table will assist the public and decision-makers in better understanding these conditions and challenges of certain sites.
4. Chapter 5 – Goals, Policies & Programs. MCL supports the four goals and most of the policies and programs. Specific comments are as follows:
  - a. Goal 3 – “Ensure Leadership and Institutional Capacity” is confusing and difficult to interpret. It is recommended that the text be revised or rephrase so that it better aligns with the four supportive policies. The supportive policies are very clear, but do not clearly relate to the goal.
  - b. Policy 1.4 – Development Certainty - “Promote development certainty and minimize discretionary review for affordable housing and special needs housing through amendments to the Development Code.” The intention of this policy is clear. However, how this policy is implemented through Development Code amendments is unknown and open ended. MCL reserves the opportunity to review and comment on the content of the Development Code amendments when they are available for public review.
  - c. Program 1 – Adequate Sites for RHNA and Monitoring No Net Loss. This program references and summarizes the Sites Inventory (housing opportunity sites in Appendix C). The text of this program includes reference to a “revamp” of the Housing Opportunity Sites (HOD) policy language to acknowledge allowable density; maximum and minimum number of units; site constraints; and “objective standards” (if applied).



MCL reserves the opportunity to review and comment on a “revamp” of this policy language when it is available for public review.

- d. Program 2 – By-Right Approval. This program specifies that housing projects/sites that are eligible for the “by-right” approval process are: 1) market rate projects that propose to provide 20% low income inclusionary; 2) 100% affordable housing projects; and 3) projects that include 20% units affordable to homeowners at 60% of AMI or to renters at 50% AMI. Through the “by-right” process, an eligible project would not be subject to a discretionary review, would be exempt from CEQA/environmental review, and would be subject to compliance with “objective standards.” There are a handful of opportunity sites in Appendix C that are being “carried over” from the current and past County Housing Elements. It is our understanding that the State housing laws require that sites “carried over” from the current Housing Element are automatically eligible for the “by-right” process. Is this correct for these sites? Please clarify.
  - e. Program 8 – Development Code Amendments. This program recommends that the County Development Code be amended to, among others increase allowable density and building height limits to 30 dwelling units per acre and 45 feet, respectively in the City Center and Baylands Corridor (noted in Appendix C- Sites Inventory). MCL supports this recommendation for the City Center but opposes a broad-brush application of this change to the Baylands Corridor. Much of the Baylands Corridor is undeveloped Baylands and marsh. Please clarify the boundaries of the Bayland Corridor and what areas are proposed for application of these code amendments.
5. Appendix C – Sites Inventory. The Sites Inventory is well organized and comprehensive. While MCL is pleased that changes were made to the initial inventory that was published earlier this year, we still have concerns about specific sites because they have known site constraints. One example is the Black Point Nursery in East Novato, which is identified as a market rate housing site. A majority of this site is encumbered by Simmons Slough, is adjacent to wetlands, and it does not have sewer service. Appendix C notes that site constraints and environmental conditions were factored into the housing development estimates presented for each site in the table. Citing these known constraints would provide a better understanding on how the housing unit estimates were determined. As noted above, it is recommended that the Sites Inventory be amended to include a column citing known environmental conditions and other constraints such as access to utilities and services. This information will be helpful for the public and decision-makers. Lastly, if there are further changes to the Sites Inventory as a result of its review by the State of California Department of Housing and Community Development, MCL reserves the right to review and comment on these changes prior to final review and action by the County Board of Supervisors.

One missed opportunity in the Sites Inventory is specific, federally owned sites in the West Marin area that are developed and/or suitable for housing use. West Marin, as a Gateway Community to Point Reyes, experiences an affordable housing deficit. If the National Park Service (NPS) personnel could be housed withing the park, that may take some burden off

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |  
mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

of the community. In addition, the West Marin workforce is in dire need for affordable housing, and pressure for housing is exacerbated by the visitor draw to areas such as the Point Reyes National Seashore. It is assumed that since the Housing Element is a State-driven process, federal lands are left to the Federal government for planning land use. Please confirm that this assumption is correct. There might be an opportunity for coordination between the Federal government (e.g., NPS), the County of Marin, and housing interests to plan for housing outside the effort of the Housing Element.

## **Draft Safety Element**

The Draft Safety Element is well-written and well organized. The draft element comprehensively covers six topic areas: a) Equitable Community Safety Planning; b) Disaster Preparedness, Response & Recovery; c) Geology & Seismicity; d) Flooding; e) Wildfire; and f) Climate Change and Resiliency Planning. MCL supports the goals, and most of the policies and programs presented in the draft element. Specific comments are as follows:

1. Sea Level Rise – Climate Change and Resiliency Planning. MCL recently adopted its Sea Level Rise Policy Position Statement. The policies and implementing programs align with the MCL policy position. MCL specifically applauds the attention to the focus on:
  - a. Adaptation planning (Program EHS-6.1b – Develop Adaptation Plans, Program EHS-6.1c – Integrate Adaptation in Plan Documents;
  - b. Promoting nature-based adaptation strategies and tools (Program EHS-6.1b – Use Environmentally Sensitive Adaptation Strategies; and
  - c. Public disclosure of risks (Program EHS-6.1f – Disclose Current and Future Hazards [through development of a resale inspection program]).
2. Wildfire Risk and Regulations. The draft element acknowledges and supports the Marin Wildfire Prevention Authority (MWPA). MCL is pleased to see that new focus areas for wildfire safety include: a) supporting steps communities can take to reduce risks; b) considering equity in wildfire planning; c) incorporating climate change tools and adaptations; d) continuing to work to understand the importance of land use patterns relative to changes in climate; e) increasing safety and resilience for nonconforming developments; f) establishing proper evacuation plans; g) updating building code requirements in the WUI; and g) ensuring post fire recovery planning. The draft text is up to date with MWPA priorities including home hardening, and evacuation route planning. Additional attention should be given to community-based fuel break efforts (work beyond defensible space) and fire wise community organizing under FireSafe Marin auspices.

While the intentions are good, there is potential conflict between two of the recommended programs, Program EHS-1.1c (Present Displacement of Vulnerable People) and Program EHS-5.3c (Require Rebuilding After Disaster to Meet Current Standards). Marin County has many areas that are developed with old structures that are nonconforming and predate current zoning, building and fire code standards. Full compliance with current code

standards at the time of re-build could result in a smaller building footprint and the reduction or elimination of housing units (causing displacement).

MCL also offers strong support for the following programs related to fire safety:

- a. Program EHS-5.3d – Restrict Land Divisions. As stated in this program, land divisions should be prohibited in very high and high fire hazard areas unless there is availability of adequate water and reliable water for fire suppression access for firefighting vehicles, and adequate evacuation for residents.
- b. Programs EHS-5.5b – Implement Ecologically Sound Methods of Vegetation Management and EHS5.5d – Require Fuel Reduction and Management Plans for New Development. While MCL currently has a policy addressing vegetation management, it is being revisited to update.

### **Future Review of Draft Environmental Impact Report**

Marin Conservation League looks forward to the mid-summer release of the Draft Environmental Impact Report (DEIR) addressing CEQA/environmental review of these documents. With the changes in housing legislation that would streamline future development review, and in some cases exempt CEQA/environmental review, MCL will be reviewing the DEIR to assess the adequacy of this document.

Thank you for this opportunity to comment these critical County documents.

Yours truly,



Robert Miller  
President



Paul Jensen  
Board Member



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jennifer Silva

### Community You Live In/Represent

Sausalito (unincorporated)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jrskis@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

multiple

### Comment or Suggestion

I would like to submit the following comments on the housing programs:

- Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss. This program is not met in this housing element. Given Marin's history, we need a large buffer of sites. We have very little buffer (2%). Many sites have been no multiple housing elements, yet don't have a by right notation. Many are religious institutions or have commercial uses, but there is not information suggesting that owners are interested in converting.

- Program 2 – Parcels subject to by-right are not identified in Parcel C, as stated in here. The Program states that the County may consider expanding By-Right. Given Marin’s history, the County needs to commit to expanding By-right. Given the enormous resistance to building anything in Marin, expanding by-right approvals is the most important step we can take to creating the housing we need.
- Program 6 notes: “Also, currently no conventional zones in the County permit multi-unit housing, and only ten percent of the parcels are zoned to permit multi-unit residential use. This limited land available solely for multi-unit use is a potential constraint to housing development.” The County should commit to expanded the percentage of parcels zoned for multi-unit housing and to convert multi-unit zoned lots to conventional zoning.
- Program 9 – Parking standards. The County proposes to amend parking standards to conform to state law. The County should go further and match other progressive jurisdictions that have removed parking standards. Note, that this does not prohibit parking, but allows owners to build the level of parking they need. This is a good first step to creating a less car-dependent culture. 60% of Marin’s greenhouse emissions are from car travel, and we should be working to reduce the need to own a car.
- Program 15 – we should go much farther on agricultural housing. We have given agricultural landowners enormous tax breaks. They should be required to ensure adequate housing for employees. Employee housing should be permitted on all agricultural land.
- Program 17 – If we want senior housing, we should create a program for automatic approval of senior housing projects.
- Program 31 – The most effective tenant protection program will be to build vastly more rental housing so that landlords have to compete for tenants. Marin should adopt a goal of having sufficient rental housing for its entire workforce. (In addition to everything here).
- Program 33 – Marin should recognize that community engagement has largely served to prevent housing from being built. Any outreach done should be with the specific goal of ensuring that more housing is built.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jennifer Silva

### Community You Live In/Represent

Sausalito (unincorporated)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jrskis@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

multiple

### Comment or Suggestion

Marin County Comments on Site Selection.

The housing element makes the points both that Marin County has underproduced housing for decades and that Marin housing, including both homes and apartments are not affordable for low income residents. It's worth noting that an individual making \$100,000 is considered low income, and that the median Marin wage is \$90,000. We have 18,000 jobs in Marin and the majority of these workers cannot afford any housing in Marin. The remaining higher paid

workers are left to compete for the very limited housing stock. Through the process, we have heard many complaints about “state mandates”. The mandates are insufficient to resolve our housing needs. The County should be doing everything in its power to ensure the mandates are exceeded. Unfortunately, this draft plan is unlikely to meet even the state goals. I urge Marin County to think bigger. Specific site inventory comments are below.

#### Site inventory/Housing uses?

- The county has not adequately addressed the probability of sites being developed or redeveloped to meet our RHNA goals. The Housing Element has a buffer of only 61 units, less than 2%, of the RHNA. Given the challenges of developing in Marin, we need a substantial buffer.
  - o The Housing Element draft contains many parcels that are currently in use. It does not indicate that the County has received confirmation from these property owners that they have an interest in redevelopment. If the County does have indications from property owners that they would like to redevelop, that information should be included.
  - o Many of the sites with existing uses are proposed to be redeveloped for a low number of affordable units. These sites are extremely unlikely to be economically feasible to develop. HCD has stated that it presumes the 50 units are a minimum necessary scale for all affordable units. (And many 50 unit all affordable projects will not be economically viable). The economics become even more challenging when the land is privately held and has an existing use. Yet, many of the affordable units are projected to come from privately held parcels with existing uses. The County should provide some justification for why they believe these sites should develop.
  - o Marin County record on housing projection is very weak. Last cycle, only 1 of the identified sites was converted to housing. Marin county did not meet its RHNA for affordable housing, and 80% of the affordable housing produced last year was via ADUs. Yet, the Housing Element assumes that 324 affordable housing units will be developed without zoning changes, and 528 total units). The County needs to explain why these sites will develop now.

#### General allocation

- Marin City is currently subject to unsafe flooding. There are periods during which there is no egress from the community. Until this is resolved, it is irresponsible and unethical to add more housing to Marin City.
- The County is placing lower income units in

areas with cost burdened renters. (Marin City/Strawberry). This seems contrary to AFFH, as it is adding proportionally more low income housing to areas already with low income. In fact, the housing element identifies the concentration of low income housing in Marin City as contributing to segregation. This housing element worsens this concentration.

- Kentfield is identified as an area with highest resources, has excellent schools, yet has relatively little housing allocated to it. In the spirit of AFFH, much more low income housing should be placed here. This is particularly true giving the achievement gap in Marin County.

#### Sites inventory – specific comments

- A number of sites contributing large numbers of units (Marinwood, St. Vincent's, Oak Manor Commercial Center) were on the 4th and 5th housing elements. Program 2 states that sites on previous Housing Elements that will now have by right approval will be noted in the site inventory. There is no notation of by right approval that I can find. Given how long these have been discussed, they need to be set for by right approval.

- Marin County Juvenile Hall – I had heard that this site was previously considered for housing the officials at Juvenile Hall found the proposal infeasible. Does the County have a plan for this land that Juvenile Hall concurs with?

- Carmelite Monastery of the Mother of God (164-290-80) – Does the Church plan to close? Or are they in agreement with this.

- Atherton Corridor 143-101-35 – Is there interest by owner in converting from one housing unit to 4?

- Tomales Catholic Church (102-080-23) – Does the Church plan to close? Or are they in agreement with this.

- Tomales Nursery 102-051-09 0.3 27235 State Route 1 C-NC/C-VCRB1 N/A 20 No 0 0 3 3 Existing Use - Low intensity strip commercial; Building-to-Land Value - 0.16 102-051-08 – Is the nursery interested in converting?

- Inverness Underutilized Residential – there are a number of properties that are listed to go from 1 housing unit to 2 housing units. These properties should be categorized under the expected 280 ADUs that the County is planning on, rather than separately, unless the County has information from these owners that they are interested in lot splits, or building non-ADU residences.

- Point Reyes (119-270-12) – this is slated for 5 low income units. This is too small of a scale to support affordable housing. Should be adjusted to moderate income.

- Pt. Reyes Coast Guard Rehabilitation/Conversion (119-240-73) – Do we have any indication from the Coast Guard that they are willing to use this property?

- Grandi Building/Site (119-234-01). This is



identified for 25 affordable units. This is typically not economically feasible, especially with a private owner. Is the owner in agreement with this conversion?

- Presbytery of the Redwoods (119-202-05) – Has the church agreed to this conversion?
- Office - Lagunitas (Upper Floors and Rear Prop) 168-175-06 - This is identified for 16 affordable units. This is typically not economically feasible, especially with a private owner. Is the owner in agreement with this conversion?
- Saint Cecilia Church 168-183-04 – This is the last individual church that I will call out. I will just note that we should not include any religious institutions on the site inventory unless we have indication from the site that they are interested in converting to housing.
- Woodacre Fire Station – Is the County considering shutting down a fire station? This is a high fire risk area. Seems unlikely that we'd close the station.
- Stinson Beach Underutilized Residential – Same note as Inverness – a underutilized site going from 1 – 2 units should be counted under the ADU allocation.
- College of Marin Parking Lot – Does the county own the College of Marin land? If not, is there an agreement with the state for this land use?
- Sloat nursery (071-191-47) - slated for 26 affordable units Has the County confirmed with the owner that they would be interested in this? As the County evaluated inventory?
- San Domenico School (176-300-30) – Is San Domenico in agreement for 50 affordable units on its campus?
- North Coast Seminary – Is North Coast Seminary in agreement to build housing on its land?
- Strawberry Commercial (one owner) – Is the owner interested in adding housing?
- Strawberry Village Center (North of Belvedere Dr) 043-321-03 – seems unrealistic that housing will be built in the parking lot of a grocery store built in 2005. Is the owner interested?
- Strawberry Village Center (South of Belvedere Dr) – this is a busy commercial center. Not realistic that it will convert to 72 low income units.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Kirsch

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

SUSAN@SUSANKIRSCH.COM

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 3: Constraints

### Page Number

p 4

### Comment or Suggestion

"Community Resistance to New Development".  
The document says, "A significant constraint to housing production in Marin County is community resistance to new housing developments at all income levels."

This statement is not true and exemplifies how staff and elected officials contribute to creating an adversarial environment. Most residents embrace the concept of the state's involvement in funding housing for low-income wage earners who need subsidizes housing. Many cities, (Mill Valley,

for example) have met housing goals for low-income residents without heavy-handed top-down mandates. The opposite of "community opposition" to builders' dreams (represented in RHNA's inflated quotas) is "community commitment to neighborhood stakeholders."

Suggestion: The County should comply with the demands of the Housing Element and simultaneously sign on as a co-plaintiff in the state lawsuit filed by Aleshire & Wynder against SB9. The lawsuit, with an emphasis on local control, gets to the heart of the value and benefits of working with community leaders. Instead of strategies "to address opposition," consider strategies "to use truth and transparency to build understanding and support."



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Kirsch

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

SUSAN@SUSANKIRSCH.COM

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 4: Resources

### Page Number

182

### Comment or Suggestion

Table H-4.1: Regional Needs Housing Allocation, 2023-2031 Planning Period displays several shortcomings of HCD/RHNA's methodology. (1) Using specific numbers instead of a range of numbers for a time period of eight years. The rigid numbers ignore the reality that city/county life, just like personal life, is filled with changes. (2) The chart displays the ridiculous increase in mandated units, from 2,298 in the 2015-2023 to 14,405 units for the next eight-year cycle. The numbers ignore the declining Marin and CA populations and the carefully researched study by the Embarcadero

Institute that showed that HCD was double-counting.

Suggestion: Push back! Comply as you must, but resist. Call out that the emperor has no clothes. Stand up for your constituents with equal vigor as you submit to a dogmatic state agency. Sign on as a co-plaintiff in the state lawsuit filed by Aleshire & Wynder against SB9. The lawsuit, with an emphasis on local control, gets to the heart of the value and benefits of working with community leaders. Instead of strategies "to address opposition," consider strategies "to use truth and transparency to build understanding and support."



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jennifer Silva

### Community You Live In/Represent

Sausalito (unincorporated)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jrskis@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 4: Resources

### Page Number

191

### Comment or Suggestion

Resources – Funding

- The resources that we have directed at Affordable housing are woefully inadequate and do not represent our values as a community. The cost to produce affordable housing is now near \$1,000,000 per unit. Adding all the possible sources of funding, it looks like we have \$40,000,000 - \$50,000,000 to apply to affordable housing. If we applied all these funds to developing units (which we can't), it would only fund 40 – 50 units. There are
- The County states that in recent years it has

funded \$250,000 out of the general fund. This is a rounding error in our \$716,000,000 budget. We are experiencing a housing crises now and we should be acting like it. We should be committing far more resources.

- There is no commitment to continue this small funding. The County should commit to provide far more funding going forward.
- It is particularly galling to see these funding after watching the county rapidly put together a deal to buy the Martha property for \$26,000. We should be applying this energy and resources to building, not preventing building.



## Draft 2023-2031 Marin County Housing Element Comment Form

To submit comments about the draft Housing Element, please fill out this form and email to [housingelement@marincounty.org](mailto:housingelement@marincounty.org) by June 30, 2022, at midnight. Alternatively, you can mail this form to: Attn: Housing and Federal Grants Division, County of Marin Community Development Agency, 3501 Civic Center Drive Suite 308, San Rafael CA 94903.

If you have general comments, indicate "General" under Section Name/Number. If you have several comments relating to different sections, please submit a separate form for each comment.

**Your Name:** \_\_\_\_\_ **Your Community:** \_\_\_\_\_

**Section Name/Number:** \_\_\_\_\_ **Page Number:** \_\_\_\_\_

**Comment:**





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Paul da Silva

### Community You Live In/Represent

Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

pgsilva@sonic.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 4: Resources

### Page Number

194

### Comment or Suggestion

New language should be added at the end of the page to reflect new concern about the health of the urban environment.

Suitable language would be:

The County also recognizes the responsibility of the City-Centered Corridor to contribute to the health of its residents and the overall environment by encouraging specific measures such as reducing the total area of impervious surfaces, increasing the amount of vegetative canopy, and

increasing the proportions of native species.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Paul da Silva

### Community You Live In/Represent

Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

pgsilva@sonic.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 4: Resources

### Page Number

180

### Comment or Suggestion

Just as the Inland Rural and Coastal communities must recognize the need for housing, so the City-Centered Corridor must recognize its responsibility to conservation. Though it is good to recognize different zones, and indeed this was a major advance in the 1970's, now in 2022 it is time to move forward again to recognize contemporary thinking. New areas of consensus that must be recognized are:

1. We face intensifying global environmental threats, especially in the three critical areas of

biodiversity loss, climate change and pollution, as summarized in the recent United Nations Report Making Peace with Nature (<https://www.unep.org/interactive/making-peace-with-nature/> )

2. Urban and suburban areas must be recognized for their potential to contribute to environmental improvement. A summary of this new understanding may be found in McKinney, M.L. 2002. Urbanization, biodiversity and conservation. *BioScience* 52(10): 883-889) (<https://academic.oup.com/bioscience/article/52/10/883/354714?login=true> ), as well as many more recent reports and popular books such as Tallamy, D. 2019, *Nature's Best Hope*. Timber Press, 254 pp.

3. Mitigation of negative trends in the areas of biodiversity loss, climate change and pollution will have positive impacts on the health of urban and suburban residents, while failure to make any progress on these issues will lead to deteriorating human health. An example of new research in this area is recounted in Donovan, G.H. The surprising benefits of biodiversity *Arborist News*, Oct 2020, pp. 26-30. ([https://www.isa-arbor.com/quizbank/resources/5629/Donovan\\_October%202020.pdf](https://www.isa-arbor.com/quizbank/resources/5629/Donovan_October%202020.pdf) ).

To bring this section up to date, language such as this should be added after the second paragraph on Page 180:

"Similarly, the City-Centered Corridor recognizes the need to contribute to improvement of the overall environment and to the health of its residents by countering the negative trends of biodiversity loss, climate change and increasing pollution."



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Paul da Silva

### Community You Live In/Represent

Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

pgsilva@sonic.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

196

### Comment or Suggestion

Comment or Suggestion

For Housing Goal 1,

"Efficient use of land" is vague, because use can be efficient with respect to many things. It could simply be generating the most money for a developer. If the plan really wants to promote sustainable development, it needs to be more specific about ensuring that projects must take into account the main three threats to sustainability today – loss of biodiversity, climate change, and pollution – as recognized by local,

state, regional, national and international agencies and organizations.

Comment or Suggestion  
For Policy 1.1,

Better and more up-to-date language would be "enact policies that help to reduce loss of biodiversity, climate change and pollution while fostering a range of housing types in our community"

Comment or Suggestion  
Policy 1.5

Better and more up-to-date language would be: "Enact programs that facilitate well-designed, energy-efficient, biodiverse and pollution-reducing development and flexibility of standards to encourage outstanding projects."



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Diane Henderson

### Community You Live In/Represent

Catholic Charities (St. Vincent's)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

diane@dmhplanner.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-14

### Comment or Suggestion

Table C-3: Residential Sites Inventory by Community

St. Vincent's is erroneously shown as being located in the Santa Venetia/Los Ranchitos community, rather than the correct Marinwood/Lucas Valley community. Additionally, only three of the eight parcels making up St. Vincent's are listed. In fact, the St. Vincent's property consists of the following eight parcels: APN 155-011-02, -22, -24, -25, -28, -29, -30 and -32, totaling over 790 acres of land.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Program 5. Propose meaningful way to use provisions that mirror SB9/Lot Split in the coastal zone. Our objective is to net two+ independent affordable units from one single family lot. Ideally, the policy would allow individual ownership and financing. Allow for ministerial approval of the lot split.





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Program 5 - Shorten the delivery of the mapping tool to 6-12 months.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Implement concepts of AB 803 in the coastal zone. Minimum lot size need not apply to affordable homes in certain communities, historic cores with traditional small lots, or under certain conditions. Due to minimum lot sizes, current residential zoning limits the creation of fee simple zero lot line detached homes in areas that allow higher densities. By retaining the allowable density and base zoning and eliminating minimum lot sizes, new and strategic opportunities emerge to create small homes that are affordable by design and are better suited for fine grain development of existing residential neighborhoods.ry of the mapping tool to 6-12 months.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Program 7 – Do not limit the ADU/JADU capacity on Religious and Institutional Facility Housing Overlay. Allow junior units consistent with the primary dwelling capacity of the project.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Program 12 Septic Capacity - Identify alternative approaches to support a much needed update of the County's methodology for calculating both single and multifamily septic capacity (program title implies only multifamily). Existing residential data shows that 65 gpd per bedroom is reasonable for all affordable projects.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

Number the sites listed in the inventory, in addition to site names for easier navigation.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Loretta Figueroa

### Community You Live In/Represent

Almonte

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

millvalleyfig@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

Marin Countywide Plan page 34 - 2023/2031  
Housing Element

### Comment or Suggestion

County Department of Finance data, 509 units in the unincorporated County were listed as short-term rental properties in January 2022. For several unincorporated communities, the number of short-term rentals is a significant percentage of the community's overall residential units. This is the case for Muir Beach (35%), Dillon Beach and Marshall (25%) and Stinson Beach (21%).<sup>28</sup> The focus groups held for this Housing Element update emphasized that short-term

rentals impact the housing market, particularly in West Marin.

Comment: Not all short-term rental properties are licensed and included in the county data. Airbnb reports over 1,000 "stays" in Marin County. I don't know how to detect "untracked" short-term rentals, but enlisting residents to search the web for unlicensed rentals is not something most people are willing to do without compensation. Almonte, my neighborhood, is the "perfect location to San Francisco, Stinson Beach, Muir Woods, wine country", etc. It's also quiet, safe, and has "free street parking".



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Loretta Figueroa

### Community You Live In/Represent

Almonte

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

millvalleyfig@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

Marin Countywide Plan page 44 - 2023/2031  
Housing Element

### Comment or Suggestion

The cost of housing, particularly for homeownership, was a consistent theme in the public outreach for this Housing Element. The following is a summary of information from the community survey:

- 59% of respondents selected "Increase the amount of housing that is affordable to moderate, low, and very low income residents" as a top housing priority.
- 47% of respondents selected "Increase homeownership opportunities for



moderate, low and very low income residents” as a top housing priority.

- 55% of survey respondents felt there was limited availability of affordable units
- Regarding insufficient housing in their community:
  - o 59% selected insufficient housing for low income households
  - o 35% selected insufficient housing for families with children
  - o 34% selected insufficient housing for older adults

Comment: We need more affordable housing for residents with low, very low, and extremely low income. The Housing Element does not include housing for residents with very low, and extremely low income. 36% of the proposed housing units are for residents with "above moderate" income and 14% is proposed for residents with "moderate" income. It's the residents with "moderate income" who need more affordable housing, not the residents with "above moderate" income.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Loretta Figueroa

### Community You Live In/Represent

Almonte

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

millvalleyfig@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

Marin Countywide Plan page 60 - 2023/2031  
Housing Element

### Comment or Suggestion

Many seniors in Marin County are over-housed, which means living in a home far larger than they need. This phenomenon will become more pronounced in the coming years, as the unincorporated County's population will continue to age. According to the ACS 5-year estimates, approximately 32% of the current population is between the ages of 45 and 65 years old. These residents will become part of the senior population over the next twenty years. During the public outreach for this Housing Element,

insufficient housing options for seniors was one of the top concerns. Some may be willing to vacate their home for a smaller unit, thus increasing housing options for families. A program has been included in this Housing Element for the County to pursue a variety of housing options for seniors. The goal is to allow seniors to trade down their current homes for other housing that requires less maintenance, is designed to accommodate the mobility needs of seniors, and is more affordable.

Comment: My observation is that many Marin County families are "over housed", meaning they are living in a home far larger than they need. I know seniors who share their homes with others so it really is two or three households in the home. If a senior wants to downsize, selling the home is always an option. When their home is sold, a developer can build another McMansion with exotic landscaping and gobs of non-permeable hardscaping. Aging in place has been a reality for Marin County seniors for years. Assisting seniors so they can stay in their home as long as they want should be a priority.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Loretta Figueroa

### Community You Live In/Represent

Almonte

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

millvalleyfig@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

Marin Countywide Plan page 10 - 2023/2031  
Housing Element

### Comment or Suggestion

Sources of Information

The County used a variety of data sources for the assessment of fair housing at the regional and local level. These include:

- Housing Needs Data Packets prepared by the Association of Bay Area Governments (ABAG), which rely on 2015-2019 American Community Survey (ACS) data by the U.S. Census Bureau for most characteristics
- o Note: The ABAG Data Packets also referenced

the U.S. Department of  
Housing and Urban Development (HUD)  
Comprehensive Housing  
Affordability Strategy (CHAS) reports (based on  
the 2013-2017 ACS)  
• U.S. Census Bureau's Decennial Census (referred  
to as "Census") and American  
Community Survey (ACS)  
• Marin County Analysis of Impediments to Fair  
Housing Choice in January 2020  
(2020 AI)  
• Marin County 2020-2024 Consolidated Plan  
• California Department of Finance, E-5 Series  
Population and Housing Estimates.

Comment: I would like to suggest that Marin  
County inspect every property at the time of sale  
or title transfer. I think many of the cities and  
towns do this. I think is the most accurate way to  
know Marin's housing inventory. Knowing that  
non-permitted improvements would be detected at  
inspection would probably would reduce the  
workload of code compliance.



Tuesday, June 14, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Amir Kia

### Community You Live In/Represent

San Anselmo

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

amirkia@me.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

Appendix C, C-19 and Appendix A, P. 174-175, P. 249-250

### Comment or Suggestion

The vacant housing site at North Knoll Road and St. Thomas Drive in Mill Valley is large and centrally located which makes it a good site for multifamily and senior housing. The site is about 7 acres, it sits next to Hwy 101 in an urban area, it has easy access from Redwood Highway Frontage Road and Thomas Drive, it is near public transportation, shopping and restaurants and next to several other multifamily housing projects. As the other letters of support have stated, senior housing is much needed in Marin and would

generate less parking and traffic for the area. Marin has one of the oldest populations in the State and there is very little housing to support a continuum of care for elderly households as they develop care needs. This site can provide much needed housing opportunities for Marin residents to age in place.



Wednesday, June 15, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Angela Gott

### Community You Live In/Represent

San Rafael

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

angelagott@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

all pages indicating housing to be devoted to seniors/ disabled throughout Marin

### Comment or Suggestion

I am 71 now and have been living in Marin County since the mid-1980s when Ronald Reagan was President. I love CA and love Marin and but for getting access to move into Public Housing (one of the lucky seniors) at age 66, I would be homeless. I worked all my life. I am a college graduate and never married or had children. I was able to go to college forever when it was free and I was in NY under President Richard Nixon's Higher Education Assistance Act of 1972 and I earned six college degrees-- 5 of them at SUNY



Buffalo (my first BA was from WKU in KY where I grew up outside of Louisville, KY. )The election of Ronald Reagan took all access to higher education away for so many students who were emancipated and had no money. He raised the age from 16 to age 24 for emancipation for financial aid is why. So I moved here at age 35 to ride out the bad Reagan years as my other goal was world travel. I managed to get to all 50 states and to 90 countries, using Marin as my base to return to. I was able to do this as I had excellent health, no career to protect and no kids to raise and could backpack around and rough it. I always worked retail, clerical, and gig jobs like pet sitting, cleaning houses, and working parties and party clean up. I always had 3 or more jobs going and worked nights, weekends, holidays. I never earned more than \$23,000 a year and usually less. I drove a 1985 Toyota hatchback for 34 years. I rented a room and wore thrift store clothes. Using my Masters in Library Science, my MS in Education English, my JD in Law, and my other 3 BA degrees got me a job at Borders Books in San Rafael and I finally got access to healthcare at age 53 ! ! I had planned to work as a bookseller the rest of my life but at age 60 Borders went bankrupt and I barely survived the recession years. I lost healthcare until the ACA started January 1, 2014 and I got on Expanded Medicaid at age 63. At age 66 in 2017 I got into public housing. I managed to find part-time no benefits at will jobs in self-storage management for \$12/hour in 2014 and still work part-time now to supplement my SSA benefits that I waited to age 70 to finally take. The entire time I have lived in Marin I was in the extremely low income category of HUD poverty and very little housing for this demographic has ever been built in Marin. I am of the boomer generation those born 1946-1964 and Marin has just not built enough housing for this age demographic. Boomer generation women are high risk for falling into homelessness because of the SSA bonafide marriage rule which was created around 1974 when boomer generation women were in their 20s and not told about the 10 year rule as they sought divorces after 8 + years in bad marriages and just wanted out. Had they known they could have gotten legal separations and waited for the 10 year rule to be met but most were never informed and just got their divorces ASAP. This created a perfect storm once boomer generation women reached their 60s & 70s and have fallen into homelessness based on their dismal work histories and working less than 35 years. So all those zero earnings years when they were raising kids now work to give them around \$600 to \$700 a month in SSA benefits or even less. I waited to age 70 and even maximized, I was only granted \$1,254/month so this is how low SSA benefits are for low paid women who were

subjected to pay inequality all of their adult lives too. All this adds up to homeless women in their senior years so Marin has just got to build more senior housing for all these boomer generation women. Landlords are evicting women who have rented for 20 years and so now in their 80s they are becoming homeless. Senior housing needs to be a priority to be built for the boomer generation. Marinelli House and Rotary Manor have minimum income streams for eligibility to get on the waitlists and boomer age women can't meet these income levels. The waitlists are all closed and people who need housing can't even get on the lists. The national point in time homeless count does NOT count homeless by age so it is not known how many homeless every year are age 60+ either. The older you are, the more vulnerable you are living outdoors. So Marin really has to commit to building more senior housing. This county has the oldest population of all 58 counties and needs to do the right thing finally for Marin's seniors who desperately need housing. Thank you. Angela Gott



Friday, June 17, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Barch

### Community You Live In/Represent

Santa Venetia

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

onep220no380@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 3: Constraints

### Page Number

5

### Comment or Suggestion

North San Pedro will not sustain the volume of evacuees during a wildfire. Eight lanes proved insufficient for 28,000 residents in 2018 Camp Fire, Butte County . This increase in resident numbers will be the cause of high mortality in a fire event.



Tuesday, June 21, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Deanna Lutzeier

### Community You Live In/Represent

Tranquility

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

dmlutzeier@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

The city of Novato's website does not show a map of prospective development for the housing mandate. One has to take the time to dig for the information, unlike the city of Larkspur's website that is transparent and involves the community:

<https://livinginlarkspur.com> I'm surprised that many people in Novato are unaware of the development. I hope I didn't miss anything.

Also, preservation of wildlife, water, and fire safety is a major concern.

Thanks,  
Deanna & Marty Lutzeier



Monday, June 27, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Karen Andresen

### Community You Live In/Represent

Novato

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

kandre529@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

I am happy to see that the project is moving along well and appreciate all the opportunities to participate. I hope the Board of Supervisors approves it. My only suggestion for improvement would be as many low-income units as possible in place of some of the market price units.



Monday, June 27, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Suzannes Sadowsky

### Community You Live In/Represent

San Geronimo Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

suzannesadowsky@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

Regarding potential sites in the San Geronimo Valley, why are two sites owned by religious organizations included (SGC Presbyterian and St. Cecilia) included but not Spirit Rock? Also, why isn't the Lagunitas School District listed as a potential publicly owned site?

**From:** [James Higgins](#)  
**To:** [housingelement](#)  
**Subject:** Comment on Draft 2023-321 Housing Element  
**Date:** Monday, June 27, 2022 11:42:55 AM  
**Attachments:** [Housing Plan, P. C-15..png](#)  
[08.05.02 Disclosure Constraints p.277.png](#)  
[16.03.01 Constraints rev.pdf](#)

---

I am James Higgins, the representative contact for "Outnumbered2, LLC," which is the title holder (owner) of **70 Oxford Drive in Santa Venetia, APN 180-261-10**, listed on Page C-15 (attached) of the latest version of the RHNA Housing Element ("the Plan").

In a previous comment to the earlier draft of the Plan I delineated numerous topographical, environmental, historical and locational constraints which should evidence the limits to any rational proposal for housing on this site. I enclose two maps, drawn years apart, to illustrate its constraints. The first (attached, in B&W) was drawn in 2008; the second (attached, in color) drawn in 2016.

The currently proposed number of twenty-eight (28) "above moderate" Housing Units for this site is *wildly beyond rational*, considering the numerous constraints.

If the known and mapped topo- enviro- and histo- constraints of the property are considered, the 'buildable' portion of this site is likely less than one-third of its overall area.

Of equal or greater consideration must be its 'locational constraint' by which I mean its access/egress limitations: a steep-sided 'box canyon' at the eastern end of North San Pedro Road, a street with universally acknowledged problematic daily congestion. Adding dozens of 'above-moderate' homes (presumably hundreds of residents) to this parcel would increase the already potentially deadly evacuation situation in the event of flood or fire.

Even if the first three legal and responsible constraints listed above were blithely overcome or ignored in this RNHA process, not even the most callous and ambitious bureaucrat would suggest risking the potential loss of human life that 28 homes here would create.

Recognizing the need for more housing, and after years of my study of the limitations of this parcel, I suggest the proposed number be reduced to four (4).

*Submitted June 27, 2022*

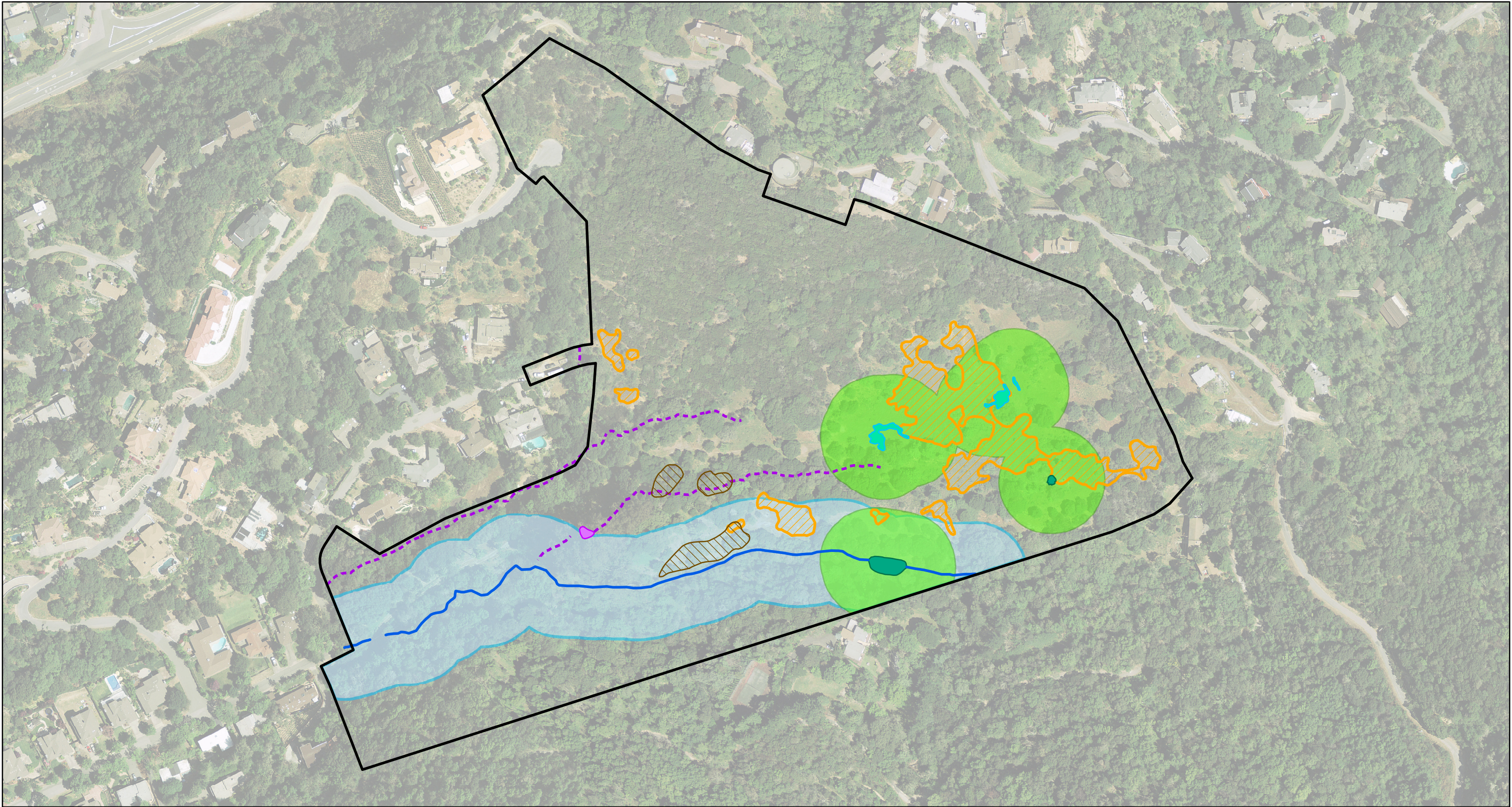


Board of Supervisor District, Strategy, and Site Name	Assessor Parcel Number	Acres	Address	Existing GP/Zoning	New Zoning	Density Allowance (du/ac)	Used in Previous HE?	Housing Units by RHNA Income Categories				Criteria
								Lower	Moderate	Above Moderate	Total	
Vacant Santa Venetia	180-171-32	1.1	180-171-32 (N San Pedro Rd), Santa Venetia	SF5/A2-B2	N/A	4	No	0	0	2	2	
Outnumbered2, LLC	180-261-10	27.9	Oxford Drive, Santa Venetia	SF5/A2-B2	N/A	4	No	0	0	28	28	
Vacant Santa Venetia	179-332-19	1.0	179-332-19 (Edgehill Way), Santa Venetia	SF6/R1	N/A	7	No	0	0	3	3	
Vacant Bayhills Drive	180-333-01	1.5	Bayhills Drive, Santa Venetia	PR/RMP-1	N/A	8	No	0	0	5	5	
Kentfield/Greenbrae												
School Sites												
College of Marin Parking Lot	071-132-11	0.8	Sir Francis Drake Blvd, Kentfield	PF/PF	N/A	30	No	21	0	0	21	Existing Use - Parking lot; Combined with College of Marin (Commercial Frontage) site below.
	071-132-12	0.3		PF/PF	N/A	30	No	7	0	0	7	
College of Marin Parking Lot	074-092-11	0.2	139 Kent Ave, Kentfield	PF/PF	N/A	20	No	3	0	0	3	
	074-181-18	2.7		PF/PF	N/A	20	No	48	0	0	48	
	074-092-17	0.2		PF/PF	N/A	20	No	2	0	0	2	
Underutilized Sites												
College of Marin (Commercial Frontage)	074-031-56	0.2	937 Sir Francis Drake Blvd, Kentfield	NC/RMPC	N/A	30	No	0	10	0	10	Existing Use - Low intensity strip commercial, built 1943; Building-to-Land Value - 0.00
	074-031-58	0.1	941 Sir Francis Drake Blvd, Kentfield	NC/RMPC	N/A	30	No	0	5	0	5	Existing Use - Low intensity strip commercial, built 1954; Building-to-Land Value - 0.00
	074-031-60	0.1	939 Sir Francis Drake Blvd, Kentfield	NC/RMPC	N/A	30	No	0	10	0	10	Existing Use - Low intensity strip commercial, built 1951; Building-to-Land Value - 0.00









L S A

LEGEND

Study Area (revised)

Regulated Waters - Federal and State

- Seasonal Wetland
- Wetland Seep
- Ephemeral Pond
- Stream
- Ephemeral Stream

Regulated Waters - County of Marin Regulation

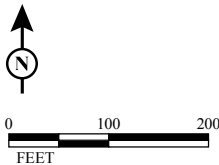
- Wetland Conservation Area  
Extends 100 feet from Wetland Limit.
- Stream Conservation Area.  
Extends 100 feet from Top of Stream Bank.  
(Width of Top of Bank Approximated as 12 feet)

Botanical Resources

- Extent of Native Grasslands in 2016

Cultural Resources

- Extent of Archaeological Site  
CA-MRN-634/H Based on Field  
Surveying Performed by Holman  
and Associates in February, 2005.



SOURCE: USGS Ortho Imagery (04/2011).

I:\LKE1601\GIS\Maps\Constraints\Constraints Map.mxd (2/26/2016)

*The Marin Montessori School Property  
Santa Venetia, Marin County, California  
Draft Constraints Map*





Monday, June 27, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Guy Palmer

### Community You Live In/Represent

Tam Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

g\_palmer2005@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Chief complaints: no traffic studies, no studies of the amount of traffic from recreational activities and tourism. No studies upon the impacts of proposed housing development upon threatened species and environmental health in general. No engineering studies upon the capacities of various infrastructural systems ( water, sewage, gas, electricity, roads etc.). Further- the presumption that public transit is widely used and effective (hint: it's not). demanding housing being placed in various small communities where there is little available land and so on. Further ABAG (et al) presumes that merely building lots of housing despite clear infrastructural problems - can be done "affordably" ABAG presumes developers will leap at the chance to ram housing into Marin

county and that new housing will be "affordable" but offers no proof that that presumption is valid. Further - despite the fact that Marin and CA. in general has lost population - ABAG performs a sleight of hand and (wrongly) asserts a "backlog" of housing demand when in fact, financial factors and the areas growth in income levels and wealth probably have way more to do with housing price levels than the supply alone. And (also) ABAG erroneously believes that despite much of southern Marin is - built out and land prices are amongst the highest in the country - building more housing with no additional land - and infrastructural incapacities - will (somehow) result in ethnic diversity and lower housing costs is laughable on its face. And such building and housing presumptions are just flatly false. Building "affordable" housing demands low cost land, expeditious permitting, minimal code requirements, cheap and abundant infrastructure and cheap and abundant labor and materials supplies in the construction industry. Absolutely none these conditions exist anywhere in the building industry, locally, area wide, statewide and/or nationwide. ABAG has simply mandated an entire series of ridiculous demands that are utterly unmeetable and will only result in the construction vast amounts of unneeded market rate housing that will only succeed in degrading quality of life in these communities and surrounding environment. ABAG's policies address non-existent problems and create monumental problems in existing communities.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Leanne Wolfson

### Community You Live In/Represent

Nicasio

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

lcwolfson@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-12

### Comment or Suggestion

The lot at 4449 Nicasio Valley Road in Nicasio is close to Nicasio Creek. In my opinion, this is not an appropriate site for 4 units. There are many homes with water issues on the east side of Nicasio Creek, and Nicasio School's water issue is an example of the dry well problems on that side of the creek. Also, due to its proximity to the creek, I don't see how it is a buildable lot for one home let alone 4 units, as .2 acres doesn't provide enough land to meet the required setback from the creek as well as provide a well, water storage, and septic system. I also think that parking would be

an issue, especially if there were 4 units. This is not a good location for multiple units for many reasons, and it's not because I don't want low income in my neighborhood. The location needs to make sense, and this location does not make sense.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Laurie Davis

### Community You Live In/Represent

Nicasio

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

wordsout@sbcglobal.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

4

### Comment or Suggestion

Will Bulltail Ranch (Lucas) be subjected to same analysis for listing in site inventory in unincorporated areas?



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Brendan Burke

### Community You Live In/Represent

Tam valley

**Please select the best way to reach you in case there are questions about your submission**

Phone

### Phone Number

(415) 879-0355

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Marin county's population is dropping or static. Why are our supervisors agreeing to anything?? This is an outrage to current residents. Water, evacuation and emergency vehicles access are current problems ignored by our supervisors. Only a small amount of land in our country is not parkland or farmland. The remaining areas are built out already. Dangerous lots are in the housing element. Toxic remnants, substance that flexes in earthquakes, sea rise imminent. All this and numerous petitions ignored by our supervisors. What is wrong that common sense is ignored. Hi density is not wanted by Marin residents. Already current residents are saddled with huge increases for sewage holding



tanks.MMWD already double cost of the state average plan huge rate increases.If affordable new residents don't pay for any of this.Our supervisors have sold out to developers.Abag is a unvoted,unwanted concoction of you politicians to destroy the status quo for profit.Fight the state!!! Pass more restrictions on all that you can.1200ft largest allowed.At least follow your own planning group who want less.The good old boy network of you pass my pet project and I'll vote for yours needs to end. The water issue alone can be used for a building moratorium.Let the state fight it out in court.Present all the impediments to safety for these new locations.Our supervisors can do so much more than rubber stamp the insanity proposed by ray Scott Weiner.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Geoffrey Flint

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

gflint@customweather.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

I would like to see Marin County take a stand against ABAG and the whole idea of 18,000 additional units in Marin County. I believe that the County of Marin needs to stand up for conservation and oppose the entire mandate being pressed on Marin County. As a County, we've stood up to other mandates such as turning immigrants over to ICE so we can certainly stand up for the preservation of Marin and its natural beauty. As a County, we need to collectively say "NO" to the new housing mandates. We do not need other levels of government bossing us around.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Lam Li

### Community You Live In/Represent

Kentfield

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

wo\_men\_ting\_hao@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

ABAG should not decide what gets built, where, and how large, in Marin County. Their refrain 'too much local control' is the opposite of democratic decision-making.

Using bribes and threats of withholding federal funds is also unethical and contrary to the structure and spirit of our government and society. Again, the ABAG chorus 'regional governance' is a clear abrogation and assault on our county and the communities within it.

No one in Marin County or the Bay Area as a whole has voted to create or govern ABAG. There is no legitimate reason for Marin County Supervisors or city councils in any of our cities to allow ABAG

to dictate how our communities are planned or governed.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Joy Sidon

### Community You Live In/Represent

San Rafael Santa Venetia

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

joysdn1@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

In reviewing housing development, I would like to see something written or a comment mentioned about roughly how much water will be used in one year from the tenants and if the water consumption will have an effect in community rationing.

Also mention something about whether the development hinders in the road exit in case of fire.

The title above says Housing and Safety Elements.

Joy

Joy



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Epidendio

### Community You Live In/Represent

Santa Venetia

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

susanepidendio@att.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

The 2 sites that I have concerns about are the Old Gallinis School site because it is the only ball field here in Santa Venetia for children to play. Also the traffic this will cause getting in and out of Santa Venetia with the schools along North San Pedro Road causing delays getting in and out of this area already are of great concern. The McPhail school is prone to flooding and also causes a problem with traffic and parking. I have lived here for 70 plus years and I believe that the impact of this will be a great problem of putting more cars on the one road in and out of are area and will take a long time to drive from are homes to 101 not considering the Children coming and leaving schools and the people coming and going at the Civic Center employees to and from work.

This is a poor plan and should not be part of this many housing for this area. Bad Idea. I vote No No No. a few would be fine not the amount you are planning. I would like to see more plans for children playing ball or Soccer or basketball not condominiums with cars. It will also cause traffic Noise in our very quiet sanctuary here in Santa Venetia.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jeff Bialik

### Community You Live In/Represent

San Rafael, Marin Organizing Committee, Housing  
Crisis Action Marin

**Please select the best way to reach you in case  
there are questions about your submission**

Email

### Email

jvbialik@gmail.com

## Housing Element Section

**Please indicate the Housing Element section  
that your comment relates to. If you have  
general comments, indicate "General". Please  
provide a separate form submission for  
additional topics you may have.**

Section 5: Housing Plan

### Page Number

Various

### Comment or Suggestion

Thank you for the opportunity to review and provide comments on the Marin County Draft Housing Element 2023-2031. I applaud the extensive efforts to inform and gather valuable input from the community throughout the process and the demonstrated commitment to seriously quantify and address the housing crisis in the unincorporated areas of Marin County.

I agree and support the approach of the Housing Element to focus on four goals, and recommend that resources and activities be directed even



more tightly toward two of these priorities:

- Undo historic patterns of segregation, and
- Meet housing needs through a variety of housing choices.

Decades of restrictive housing policies emphasizing “local control” over land use decisions that sought to “protect the character of the neighborhood” has resulted in a Marin County that is highly segregated and a housing supply that is not only inadequate to meet current needs but lacks the diversity of housing options that a thriving community requires. We cannot undo historic patterns of segregation without significantly increasing the supply of housing available to all income levels, especially for those who were previously excluded.

The Marin County Draft Housing Element 2023-2031 is understandably comprehensive given the numbers of areas it must cover, and the range of perspectives reflected in public input. Given that we are indeed in the midst of a housing affordability crisis in Marin, it is imperative that the draft retain its emphasis on the need to increase development of new affordable housing.

In addition to the extensive list of potential sites for new construction, the draft outlines specific goals, policies, and programs designed to create an environment that would be conducive to the creation of affordable housing. I urge the County to retain and possibly strengthen these elements. Specifically:

- Reducing the risk and costs to funders and developers
- Creating clear standards, incentives, minimal reviews, and streamlined permit processes
- Prioritizing water and sewer allocations for new affordable housing development
- Using land efficiently by up zoning for density and allowable building height, and setting minimum density targets
- Expanding the scope of by right approval streamlining beyond sites covered under current state law
- Removing discriminatory language such as “single unit” and “protecting the character of the neighborhood” from zoning and planning policies
- Bringing Marin County into compliance with current state law regarding inclusionary housing, parking standards, ADU sales for nonprofits, and housing for special needs groups

It is important that current policies and programs that provide incentives, fee reductions, and funding for affordable housing remain in place. It is also certain that significant new financing resources will be required if the County is to meet its affordable housing goals. The Draft Housing Element does not directly address the question of where new money will come from and I encourage us all to prepare for that critically important

conversation as soon as the housing element is completed.  
Thank you.

Sincerely,

Jeff Bialik  
San Rafael, CA



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Christopher Dunham

### Community You Live In/Represent

Novato

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

chrisandlisette@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

ABAG's goal of shifting housing density from cities to suburbs goes against the heart of the Marin County development vision: to preserve open space throughout the suburban areas of the county.

Therefore, please do not implement this scheme in Marin County; instead, it's far more appropriate for the Marin County leaders/supervisors to continue to plan & implement our housing development needs.

**From:** [safetyelement](#)  
**To:** [Zeiger, Jillian](#); [Tanielian, Aline](#)  
**Subject:** FW: Applies to housing and safety  
**Date:** Tuesday, June 28, 2022 3:46:14 PM

---

This comment came to the safety element email

-----Original Message-----

From: Lorin Schneider <[photolas@comcast.net](mailto:photolas@comcast.net)>  
Sent: Monday, June 27, 2022 11:49 AM  
To: safetyelement <[safetyelement@marincounty.org](mailto:safetyelement@marincounty.org)>  
Subject: Applies to housing and safety

Adding the thousands of homes that you want to add to Marin County in Tiburon, Mill Valley, Sausalito and Corte Madera is one of the biggest mistakes this county & the state could be making. You have to use whatever is available housing and is already built, not build more. Our infrastructure is horrendous in this county and getting in and out of these cities in any kind of an emergency is an impossibility! You people have to wake up and realize what you're doing and make the affordable housing with what is already here. Restructure what is already here, do not add more !!! There are ways that this can be done but adding more housing is absolutely absurd because adding thousands of more cars on these roads is going to be a hazard!!! Not quite sure who it is that we have to get this through to but that is the reality.  
Lorin Schneider, Tiburon.

**From:** [safetylement](#)  
**To:** [Zeiger, Jillian](#); [Tanielian, Aline](#)  
**Subject:** FW: Safety  
**Date:** Tuesday, June 28, 2022 3:47:19 PM

---

This message came to the safety element email

---

**From:** Brian Mcarthy <brianmcCarthy1@gmail.com>  
**Sent:** Tuesday, June 28, 2022 11:33 AM  
**To:** safetylement <safetylement@marincounty.org>  
**Subject:** Safety

Many of the sites in the housing element are dangerous. Toxic substances are in the ground. These were ignored at great cost at Hamilton. Sea rise is imminent at many sites, especially near shoreline. Roads with parking restrictions for access will be blocked under the new rules. CEQA has been run over and ignored in this planning. Toxic air near bus and freeways are not good for poor or kids. Would you want to live in a place where car exhaust is omnipresent?? No but you will have houses built there. Lot subsidence during earthquakes is also ignored. Water availability in the future is exacerbated by new building and residents. This housing element is wrong and politically driven to destroy our community as we know it. WRONG AND UNSAFE!!!!.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Enrique Goldenberg

### Community You Live In/Represent

San Rafael, Lucas valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

bikki123@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

Policy 1.5, page 197

### Comment or Suggestion

Reference to this policy, have you considered utilization of prefab units that take 1 or 2 days to erect or if more complicated just a couple of weeks? Extraordinary models start in the mid \$50,000 for one bedroom and less than \$100,000 for two bedrooms, complete with appliances, bathroom, electrical installation, even, some of them with solar collectors, security and more. Please check companies like Roombus, Boxabl, Tenfold engineering and many others. You can mix several designs to make it interesting. Prices are way less than building them from

scratch. Be bold and check this possibility. Once you get funding and land purchased you can have a whole neighborhood in a couple of months. For your information, I understand that Elon Musk lives, when on the rocket site, in a Boxabl unit.



Tuesday, June 28, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

**Name**

**Community You Live In/Represent**

**Please select the best way to reach you in case there are questions about your submission**

Email

**Email**

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

**Comment or Suggestion**

Hello,

Thank you for consideration of my suggestion. I ask that my comment be considered, but I do not give consent to my comment appearing in any public forums unless as part of a generalized list that does not release my name or any of my personally identifiable information.

I urge you to remove the Atherton Corridor from the sites inventory list. This is an extremely sensitive wildlife corridor and re-zoning this area to support high density homes is irresponsible and will cause irreparable damage. The entire corridor, from Black Point to the beginning of Atherton must be preserved to support the



migratory birds and endangered species who call this place home. Both the city of Novato and the County continue to permit lots along this corridor to be re-zoned and subdivided for development. This greatly disrupts the migration of wildlife here to important food and water sources and decreases their overall safety. The Atherton Corridor is not a suitable area for what you are proposing. The county should instead work with the city of Novato to develop areas that have already been paved over and underused, such as the Firemans Fund and the Old CVS complex on Novato Blvd. Building high density housing on Atherton undermines conservation! The multi acre lots on Atherton may have but one home, which the county has deemed underutilized, but that is far from the truth. These lots provide native plants for pollinators and safe havens/homes for all the wildlife. If you strip that away with high density homes, you are causing so much damage to a fragile ecosystem.

As tax payers, we should not be concerned with providing housing to people who have entered this country illegally. As an ethnic minority of both latin and south east asian origin, I have not experienced any racial bias in Marin county and I certainly don't want the tax dollars I provide to the county to fund undocumented immigrants. Living in Marin is not an entitlement. The people who live and have moved here from the outside like myself work hard to do so. I can't just illegally move to a different country and expect to receive free hand outs of housing and income. There is nothing wrong with people moving to different states because California has gotten too expensive. I've done it before and there is nothing wrong with this concept.

More people are working from home. Why not convert those vacant offices into housing?

Lastly, we do not have the water resources to support more housing. There is a drought and water sources are drying up. You cannot continue to kick the the issue of water down the road. In California, we've seen catastrophic events when companies ignore the warnings given to them. By moving forward with sites along the Atherton corridor, you'll end up with another Salton Sea. What happens then? You cannot reverse this. It's done. Biodiversity gone, birds gone, plants gone, everything gone. The county must be willing to fight for what it has preserved for so long.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Thomas Wood

### Community You Live In/Represent

Nicasio

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

thomaspwood@att.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

The 4449 Nicasio Valley Rd parcel is adjacent to the town square. Availability of ground water on the parcel is little or none.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jennifer Silva

### Community You Live In/Represent

Sausalito (unincorporated)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jrskis@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 3: Constraints

### Page Number

90

### Comment or Suggestion

I appreciate that the Housing Element states: "A significant constraint to housing production in Marin County is community resistance to new housing developments at all income levels." However, the suggested remedies are insufficient. Education is good, although it is not clear if the County is allocating funding for this. Much more important is to lessen the ability of a small number of residents to stop projects. More effective solutions would include: (1) maximum number of public hearings on projects (2) expansion of by-right approval (3) expansion of

conventional zoning.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jeanine Strobel

### Community You Live In/Represent

Novato

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

jestrobel12@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix D: Affirmatively Furthering Fair Housing (AFFH)

### Page Number

From presentation to Planning Commission

### Comment or Suggestion

I strongly support creating affordable housing for working people in Marin, especially families who are struggling to keep up with housing payments/rent and seniors/people with disabilities.

Creating more affordable housing with help both our neighbors and our communities.



## Draft 2023-2031 Marin County Housing Element Comment Form

To submit comments about the draft Housing Element, please fill out this form and email to [housingelement@marincounty.org](mailto:housingelement@marincounty.org) by June 30, 2022, at midnight. Alternatively, you can mail this form to: Attn: Housing and Federal Grants Division, County of Marin Community Development Agency, 3501 Civic Center Drive Suite 308, San Rafael CA 94903.

If you have general comments, indicate "General" under Section Name/Number. If you have several comments relating to different sections, please submit a separate form for each comment.

Your Name: Betty Lou Hudson Your Community: Inverness

Section Name/Number: Section 2 Page Number: \_\_\_\_\_

### Comment:

Dear Housing and Federal Grants Division,

I am writing to share my thoughts and concerns about your research of housing needs for unincorporated Marin county.

My first concern is supplying water to additional housing. We in unincorporated Marin county already have a problem with sharing the water supplies we have. Adding additional housing only adds to that problem.

Secondly, for the number of additional housing you are proposing I am concerned for the jobs that would be available to those residents. Where will they be working in this community? Are there enough jobs to support this additional housing? Or will you be creating housing for commuters to areas that have jobs to support them.

Your ideas are 'White Mans' Feel Good Ideas' ! No water. No Jobs. But we're feeling good that we got some housing out there in West Marin and those people who will be commuting or are retired.

The brilliant people that fought so hard to keep urban sprawl from happening in the 60's in West Marin is only exasperated by thoughtless planning you're proposing.

Thoughtful Density. That's our savior.

Thank you for taking the time to read my comments. I hope you will THINK about them.

With kind regards,  
Betty Lou Hudson



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jill Barnett

### Community You Live In/Represent

Belvedere

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

JillGBarentt@hotmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Comment or Suggestion

California's politically driven quest for additional housing stands to damage our towns with unrealistic and unsupported housing requirements. RHNA numbers are flawed and unsupported. Who says so? The Auditor of the State of California, Michael S. Tilden!

On March 17, 2022, the office of the Auditor of the State of California published their analysis of the methodology used to reach the RHNA numbers. In the summary, Tilden writes that Housing and Community Development, which performed the analysis used to create the flawed RHNA numbers, "made errors when completing its needs assessments because it does not sufficiently review and verify all of the data it uses....did not demonstrate that it adequately considered certain

factors that state law requires for housing needs assessments in some regions...(and) has not provided sufficient support for its projections of the number of households that are likely to be formed in the future." He concludes the report by writing, "Overall, our audit determined that HCD does not ensure that its needs assessment are accurate and adequately supported."

The RHNA numbers ignore the realities of each municipality. 160 new housing units assigned to Belvedere are unrealistic. The town is already built out. It is NOT a transit hub. There is only one lane in and one lane out. This week there was tree trimming on Tiburon Blvd, tree trimming not an emergency, and traffic was unsafely backed up all day long on Tiburon Blvd. What would happen in an emergency?

These housing numbers must be re-evaluated based on reality.

Jill Barnett





Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Kirsch

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

SUSAN@SUSANKIRSCH.COM

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

p 11

### Comment or Suggestion

RHNA is called "a critical part of the State housing element law," yet it is fundamentally flawed. The state audit report, which only addressed three of seven concerns identified in the audit request letter, concluded it was riddled with errors, carelessness, and inconsistencies. To remedy the problems discovered in the audit, the audit recommends that HCD take steps to improve its processes. This is akin to putting the foxes in charge of checking the fences of the henhouse. The agency is unreliable and focused on meeting the economic needs of developers and investors,

not constituents.

Without addressing the HCD/RHNA shortcomings, counties and cities are still pressured to invest thousands of hours and millions of dollars in an unreliable process that mandates unachievable goals. As one elected official said, "the state has a gun to our head."

Suggestion: The County should comply with the demands of the Housing Element and simultaneously sign on as a co-plaintiff in the state lawsuit filed by Aleshire & Wynder against SB9, which gets to the heart of the shortcomings of RHNA and recent legislation.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Emilie Lygren

### Community You Live In/Represent

Los Ranchitos

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

emilie.lygren@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

I am a property owner and resident at 3 Oak Ridge Road in the Los Ranchitos neighborhood. I am aware that Leyla Hill has been advocating on behalf of the Los Ranchitos Improvement Association to restrict ADU sizes in the neighborhood, and to ask the Planning Commission to make it such that SB9 will not apply in the neighborhood.

I am writing to communicate to the County Planning Commission that Leyla Hill does not speak for all residents of Los Ranchitos, to offer some alternative perspectives on planning and housing in Los Ranchitos, and to strongly urge the Planning Commission to apply SB9 to the neighborhood of Los Ranchitos.

While I have a different perspective on the implementation of housing planning in the neighborhood, I share some priorities and concerns with the Los Ranchitos Improvement Association: I too am concerned about fire safety. And I too enjoy the the quiet, rural feel of the neighborhood, value the space for agricultural activities, and want to support wildlife. However, I do not see any of these priorities being at odds with the implementation of SB9 in Los Ranchitos.

The implementation of SB9 would allow property owners who would like to help create more housing opportunities in Marin to do so. Because lot sizes are so large in the neighborhood, it is very feasible from my perspective to offer landowners the choice to build an additional unit through the implementation of SB9 while retaining the rural and quiet feel of the neighborhood.

I already have a legal ADU on my property at 3 Oak Ridge Road. I rent this unit out at below market rate to offer an affordable housing option in the neighborhood. There is ample space to build another single-family dwelling on our property while following setback laws and by creating ample defensible space around all dwellings on the property. Building one more single family home on our large property would not impact or limit the possibility of agricultural activities such as keeping bees, chickens, or goats. Most of the 1.25 acre of land I live on is unused, largely empty grassland. Many of the properties around the neighborhood are similar. Additionally, the roads in the neighborhood are quite wide, and our quick proximity to the freeway makes Los Ranchitos a safer neighborhood than many in terms of evacuation in the case of a fire. Moreover, there are other ways to support local wildlife, such as by planting native plants and by thoughtfully planning gardens to offer cover for wildlife, rather than by restricting all development.

While I understand the concern of residents who do not want large-scale development to come to the neighborhood of Los Ranchitos, I see a large amount of difference between giving landowners the choice to build an additional single family dwelling development or ADU on their property, and development in the form of large apartment buildings throughout the neighborhood. The implementation of SB9 in Los Ranchitos would not equate to an immediate influx of massive housing developments in the neighborhood. Likely, many landowners would not choose to build more on their properties, and new developments would still need to be approved by the County Planning Commission, offering the opportunity to consider

impacts to the neighborhood's fire safety and other important issues.

I sincerely hope the Housing Element will offer landowners choice and agency in how they manage their properties in the Los Ranchitos neighborhood by applying SB9 to the neighborhood of Los Ranchitos.

With gratitude,  
Emilie Lygren  
Property Owner  
3 Oak Ridge Road  
Los Ranchitos



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Karen Auroy

### Community You Live In/Represent

Novato

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

karenauroy3@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

21

### Comment or Suggestion

As a long-time resident of Novato and an active member of the Marin Organizing Committee (MOC), I noted particularly that we have a large gap of 5+ housing units being built in our unincorporated areas of Marin. It shows on the chart that the number of 5+ units built between 2013 and 2021 has been 0%. We need more of this type of dwelling with an allocation of at least 20% for affordable housing.

**From:** [Liebster, Jack](#)  
**To:** [kbeals@berkeley.edu](mailto:kbeals@berkeley.edu); [housingelement](#)  
**Subject:** RE: Please allow additional units in Los Ranchitos  
**Date:** Wednesday, June 29, 2022 5:53:47 PM

---

Hi,

With this email I am forwarding your comments to the appropriate people.

Thanks

---

**From:** kbeals@berkeley.edu <kbeals@berkeley.edu>  
**Sent:** Wednesday, June 29, 2022 4:39 PM  
**To:** Liebster, Jack <JLiebster@marincounty.org>  
**Subject:** Please allow additional units in Los Ranchitos

Kevin Beals would like information about:

I live with 2 other people on 1¼ acres of mostly unused land. Our land could easily accommodate more occupants while maintaining semi-rural appeal.

Leyla Hill, president of the Los Ranchitos Improvement Association, distributes biased information in opposition to any development, & has urged us to write against it. She claims we will become dense with housing, & agricultural activities/nature will be lost. She does not speak for me. She wants to restrict ADU footage to 1200 rather than the 1800 allowed by SB9. How does restricting the already small living footprint of an ADU benefit anyone?

She says fire hazard is too high & roads too narrow. We chose this home because it's fire hardened, & roads are wide with little traffic.

I am in favor of adding housing to properties in a reasonable manner that preserves open space. Not fire hazard properties, such as steep hillsides, but flatter properties like ours.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Sara Robinson

### Community You Live In/Represent

San Anselmo

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

SRobinson@MarinCounty.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Page Number

195-225

### Comment or Suggestion

As the coordinator for the Age Forward Framework for an Age-Friendly County of Marin, I want to commend the work of the many staff involved in preparing this Housing Element draft.

The goal of the Framework is affordable and accessible housing options that are available to all residents, but our focus area has been addressing the limited supply of affordable and accessible age-friendly housing that would ensure that older adults can age in their homes or desired setting.



Below I note how the draft addresses many of the needs of our older resident population, and suggest a few more policies, programs, and implementation considerations.

Sara Robinson

\* In programs 4 and 7 you enhance the promotion and encourage a greater supply of ADUs.

\* In programs 13,14 and 21 you assist residents with home modifications to improve accessibility and address design for residents and adults with functional needs

\* The program 8 development code amendments might provide much-needed residential care facilities and smaller homes in the nonprofit-owned ADUs.

\*With Program 16 Project Homekey we encourage future consideration of dedicated shelters to meet the unique needs of homeless adults over 60. Holding a homeless count and survey of those 60+ would provide the data needed to support decision-making.

\*In programs 17 and 25 when considering incentives and development standards to facilitate various senior housing options consider a CA Master Plan for Aging Initiative: Assess the feasibility of expanding the Adult Family Homes model (currently for adults with a developmental disability) to more aging adults, including with dementia. Also, consider transitional housing for homeless seniors tied with HHS supportive services as a direct stepping stone to permanent affordable housing. Ex. [ServingSeniors.org](http://ServingSeniors.org) in San Diego

\*Consider a shallow subsidy program to help housing-insecure or recently homeless older adults transition into stable housing by providing direct financial assistance to address their unique needs, challenges, and barriers. (Funding could be time-limited for transportation, move-in costs, rental assistance, and security deposits.)An assessment of older adult homeless in San Diego determined that a subsidy of \$500 a month helps keep residents in their homes and is less than the cost to shelter them or care for them on the street or in the hospitals. San Diego has had success with this program.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Dale Benson

### Community You Live In/Represent

Greenpoint/Atherton Avenue

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

dale\_90026@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Page Number

Chapter 1, Page 5

### Comment or Suggestion

"Provide efficient and effective transportation. We will expand our public transportation systems to better connect jobs, housing, schools, shopping, and recreational facilities. We will provide affordable and convenient transportation alternatives that reduce our dependence on single occupancy vehicles, conserve resources, improve air quality, and reduce traffic congestion."

How will be accomplished? Please be more specific. Design communities that prioritize people over cars. Provide safe and convenient

walking and biking infrastructure within neighborhoods and between neighborhoods and destinations. Build grids - not lollypop cul-de-sacs. Please- not just token bike lanes here and there. We need a robust bicycle and pedestrian trail system, traffic calmed streets, and safe and convenient transit connections. Please see City of Davis planning documents for examples.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Sandra Mardigian

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

smardigian.kilili.self.help@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

The imposed housing addition requirements are not prudent, safe, sustainable, or rational. Here in Marin County we have water supply insecurity due to the era of drought that we find ourselves in. Until there is a plan in place for ensuring a dependable water supply adequate for the population already here and then some, it seems insane to add more housing. Drought conditions also cause extreme fire danger. In the month of June there have already been many fires, what will happen in the upcoming driest months when the danger becomes elevated? The constrained escape routes for evacuation are a terrifying feature of the fire jeopardy in our county. These issues are obvious reasons to postpone the concentrated, programmatic buildup of additional

homes until a realistic study influences the decision making state entities that have imposed the quotas. this is an urgent matter, it needs to be faced.



Wednesday, June 29, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Housing Crisis Action (HCA)

### Community You Live In/Represent

Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

housingcrisisaction@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Thank you for the opportunity to comment on the Marin County Draft Housing Element 2023-2031. On behalf of Housing Crisis Action, a robust network of over 800 Marin County housing advocates and 17 organizations working to tackle our housing crisis. HCA's mission is to create, build, and preserve much-needed housing in Marin County. We support more housing at all levels of affordability and reforms to land use and zoning code to make housing more attainable, jobs and transit more accessible, our environment more sustainable, and the County more racially and economically equitable.

We are grateful for the County's extensive outreach efforts to engage the community in the Housing

Element process and garner feedback and input from all community members. We support the County's effort to respond to community feedback and focus on "programs to expand and preserve the County's affordable housing inventory, to create a diverse range of housing choices, and to mitigate infrastructure constraints." We urge the County to focus on two of the goals in particular, "Meet Housing Needs through a variety of Housing Choices" and "Combat Housing Discrimination, Eliminate Racial Bias, Undo Historic Patterns of Segregation."

We commend the deep focus on increasing the development of new and affordable housing. We are excited about the extensive list of potential sites for further development, areas to be rezoned, and other detailed policies and programs. Within the current draft, we urge the County to retain and strengthen the following elements:

- Reducing the risk and costs to funders and developers
- Creating clear standards, incentives, minimal reviews, and streamlined permit processes
- Prioritizing water and sewer allocations for new affordable housing development
- Using land efficiently by up-zoning for density and allowable building height, and setting minimum density targets
- Expanding the scope of by-right approval streamlining beyond sites covered under current state law
- Removing discriminatory language such as "single unit" and "protecting the character of the neighborhood" from zoning and planning policies
- Bringing Marin County into compliance with current state law regarding inclusionary housing, parking standards, ADU sales for nonprofits, and housing for special needs groups and seniors

Undoing historic patterns of segregation is essential to a sustainable Marin. We support affirmatively furthering fair housing and actively reforming land use and zoning code so that people at all income levels can afford to live in our community. By significantly increasing housing supply and options, we can begin to create a more equitable and thriving future for our County. Funding for affordable housing, streamlined permitting and approval processes, and incentives/fee reductions are essential to meet the plan's goals. During the next steps of this process, we look forward to conversations on funding sources to help make this well-outlined plan of increasing and improving housing supply a reality.

Sincerely,

The Housing Crisis Action Steering Committee

Cynthia Murray, CEO, North Bay Leadership  
Council

Jeff Bialik, Marin Organizing Committee

Diana Conti, Trustee, College of Marin

Linda M. Jackson, Program Director, Aging Action  
Initiative

Larry Kennings, Board member, Marin  
Environmental Housing Collaborative

Ethan Strull, Marin Housing Activist





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Elizabeth Patterson

### Community You Live In/Represent

Ross/Nicasio

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

liebe@patterson5.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Thank you for addressing the issue of affordable housing in Marin. I have not been able to review the entire document, but I have two general comments that I would like to share. I have lived in the county of Marin for 30 years in the town of Ross and have owned agricultural property in Nicasio for the past 7 years. My comments have to do with living in these two, very different communities in Marin - one suburban and affluent, and one rural and agricultural. While building new affordable housing units in Marin is important, there needs to be an assessment of existing housing and how it can be utilized to serve the needs of the community. The two communities that I am part of have two very different housing needs.

1. Many living in affluent communities in Marin are over-housed and houses sit empty much of the year. ADUs are built as pool houses, not used as affordable housing. Could some of this empty housing be utilized to give teachers, health care providers, firemen and public safety officers that work in our communities and affordable place to live? Could local government provide an incentive to homeowners to rent to those that work in and serve our communities at rents that are affordable for their income levels not at market rates? It takes years to build new units, but is there a way to utilize housing that already exists?

2. There is an enormous need for Agricultural Worker Housing on agricultural properties in West Marin. Agricultural workers can't commute to their jobs and need to be on-site to care for land and animals. Most farms and ranches in Marin are permitted to have housing for their workers, but the permitting process of building, repairing or replacing this housing is extremely time consuming and expensive. It took 14 months to get plans permitted to replace an approved worker housing unit on my farm in Nicasio and one dairy farmer I spoke to said it took 5 years to get housing for his workers approved. The rural housing stock is aging and needs to be repaired, but the time, hassle and cost is often too much for farmers and ranchers to plow through. This leaves agricultural workers living in substandard living conditions or with a long commute to their jobs of growing the food that we all depend on. Is there a way to make the process of building and repairing Ag worker housing more efficient and affordable? Could there be a pre-approved plan for agricultural worker housing that could be built quickly and affordably? Could agricultural properties use waste management systems other than extremely expensive and space consuming septic systems that are currently required?

Affordable housing is an extremely important problem in Marin County that needs to be addressed, and I appreciate the work that has gone into this report. It is an immediate and complex problem and I hope you will consider ways to look at the different needs across the county and find ways that will make more housing available now to members of our community that need it. Please feel free to contact me if you have any questions.

Sincerely,  
Elizabeth Patterson



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Chris Hulld

### Community You Live In/Represent

Point Reyes

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

crhulls@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

I am writing to 1) provide feedback on the list of housing sites and 2) offer two of my own properties as additions to the list.

1) Feedback

I am the creator of this petition (<https://www.change.org/savepointreyes>) which is requesting the county reconsider the use of high density housing to fulfill housing needs in Pt Reyes and broader West Marin. Over 400 people, largely locals have signed on. Details of the request are in the petition and I have been in touch with Supervisor Rodoni. I hope the county listens to such a large group of its constituents.

## 2) Additional Sites Offer

I am fortunate to own multiple properties in Marin, some of which are more appropriate for low income housing than some of the sites on the list in Inverness and Pt Reyes.

I would like to volunteer:

-451 Mesa Road, Point Reyes - this is 2 acres across from the Green Barn site. It has far superior septic options and also is less visible to the downtown. I would like the county to consider swapping the Green Barn with my parcel.

-13270 Sir Francis Drake, Inverness - this is a property adjacent to the county lot. I have been considering resorting the property to provide low income housing and would be happy for it to be on the official list. I note that the address is already on the county list, but I think the county meant to add the adjacent county lot to the list, not the property that I own which is the actual 13270 SFD.

Thanks,

Chris  
415 497 7260



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Patrick McNeil

### Community You Live In/Represent

Nicasio

**Please select the best way to reach you in case there are questions about your submission**

Phone

### Phone Number

(415) 662-2075

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C12

### Comment or Suggestion

To Whom It May Concern: I am the current owner and steward of one of Nicasio's most historic properties, parcel #121-080-05, located at 4449 Nicasio Valley Road, Nicasio CA 94946. The historic nature of this site has always been preserved by my family, and I continue to preserve, memorialize, and share this treasured Nicasio history from this site. Appendix C characterizes this site as "vacant"; it is not a vacant site. This site would not be physically eligible for any development as stated or suggested. Moreover, this site is significant to the character, charm,

identity and the preservation therein of Nicasio.  
Thank you for your time.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Elizabeth Taska

### Community You Live In/Represent

West Marin

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

bethtaska1@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

The Marin problem:

- Due to the end-of-work in offices and shop in-person, our downtowns are on life-support, minus the life support.
- Affordable housing is about as scarce as ridership on our "SMART" train.
- California has mandated new dwellings be constructed (just in unincorporated Marin: 3,569)—we don't really know where, we don't know how.
- Municipal leaders have been spending millions of dollars (just Marin County paid \$1.6M this year) solely on consultants (not from our community) to identify locations (very questionable) to build housing.
- Many of these locations are far away from

our downtowns, transportation, water and even if anyone would build on them (likely requiring massive subsidies) they would destroy pristine open space.

- Marin is becoming less and less diverse—racially, culturally, economically.

It's an exercise in futility as during the last (Element) go-around—almost nothing was built. But this time, the state just might get serious and put in draconian penalties for our non-compliance.

These are all big problems that can be almost completely solved with one solution.

“What’s the one thing you can do, such that by doing it, everything else will be easier or unnecessary?” – Gary Keller

The One Thing: We can immediately support and encourage the conversion of hundreds if not thousands of empty offices and retail spaces within our communities to quality, highly rentable, housing (that’s affordable and profitable for property owners). This encourages diversity in our neighborhoods. Thirty-eight percent of all offices in the United States are vacant. There’s no indication this will change. Just in San Rafael there’s well over 100 vacant commercial buildings (Loopnet).

By doing so, our downtowns could be revitalized, commercial property owners could make their properties profitable, local establishments could increase their viability and pristine open space in the middle of nowhere with no water or transportation can be left to the hikers, cows and wildlife. And, no increased traffic congestion.

How can this be done?

First, it’s begun. San Rafael is leading the way with supporting conversion of downtown, mixed use commercial offices to housing.

What’s the path?

1. Zoning—most downtowns have historically blocked residential housing on ground level. This is an archaic zoning “ideal” when there was demand for retail and offices in our downtowns. It should be stopped immediately.
2. Life Safety—residential units need to be safe and up to code. Fortunately, most commercial spaces are built to a higher standard than residential codes require. Brining these spaces to safety standards is quite doable.
3. Identify appropriate commercial buildings—



Apartments need windows, doors, air and light.

The best commercial buildings to convert are long and narrow. Luckily, we have plenty.

4. Upgrades. The most appropriate buildings to convert are those that have been seismically upgraded or built within the past 50 years.

Otherwise, upgrading could be cost prohibitive.

5. Incent homes to be homes. Many of our downtown homes were allowed to become commercial and are now vacant. Because they always were houses, not commercial property, these can be done with almost no work.

6. Parking. Most of our downtowns have public transportation. Parking is not critical, and public lots can be tapped into. No mandates on parking should be made for units constructed within ½ mile of public transportation.

7. Profitability—the best development plans are those that make economic sense to those who have the property and means to convert. The average rent in Marin for an apartment is just under \$3,000 and demand is surging. The cost to convert, can be recaptured quickly making this a highly attractive solution to property owners of empty commercial spaces with almost no other options.

8. Demand—Not only is the state mandating more housing, the market, with rising interest rates, and inflation, will mean there would be almost no vacancies.

**From:** [Kutter, Rhonda](#)  
**To:** [housingelement](#)  
**Cc:** [Gounard, Doreen](#); [Imbimbo, Jennifer](#)  
**Subject:** FW: Housing Sites  
**Date:** Thursday, June 30, 2022 10:43:43 AM  
**Attachments:** [image001.jpg](#)

---

FYI

Rhonda Lynn Kutter  
Aide to Supervisor Dennis Rodoni  
she/her  
Marin County Board of Supervisors  
415-473-3246; [RKutter@MarinCounty.org](mailto:RKutter@MarinCounty.org)

---

**From:** BOS <[BOS@marincounty.org](mailto:BOS@marincounty.org)>  
**Sent:** Thursday, June 30, 2022 10:39 AM  
**To:** BOS - Aides <[BOS-AidesNOT@marincounty.org](mailto:BOS-AidesNOT@marincounty.org)>  
**Subject:** FW: Housing Sites

Aides,

Attached is a letter from Linda Rames received in the June 28, 2022 BOS mailbox that I believe is related to the Joint BOS/PC meeting. Please forward as you deem appropriate.

Thank you,



**Joyce Evans**  
DEPUTY CLERK

County of Marin  
Board of Supervisors  
3501 Civic Center Drive, Suite 329  
San Rafael, CA 94903  
415 473 3768 T  
415 473 3645 F  
CRS Dial 711  
[jevans@marincounty.org](mailto:jevans@marincounty.org)

---

**From:** Linda Rames <[ljrames@gmail.com](mailto:ljrames@gmail.com)>

**Sent:** Tuesday, June 28, 2022 4:07 PM

**To:** BOS <[BOS@marincounty.org](mailto:BOS@marincounty.org)>

**Subject:** Housing Sites

June 28th 2022

Members of the Board of Supervisors:

This letter is written in regard to sites chosen by your board as possible housing locations in the Tam Valley/Manzanita area of Mill Valley.

The Board has been advised several times in the past of inappropriate sites at the above mentioned locations in Mill Valley, specifically 150 Shoreline Hwy and 260 Redwood Hwy. To remind you, 150 Shoreline Hwy is in the Baylands Corridor and is notorious for flooding several times during the year. Cal Trans has placed sandbags at the site, but they do not stop the water. In addition, it is advised in the Tamalpais Community Plan that there should be no building in the Baylands Corridor. Do you really think this is an appropriate site for homes and a small hotel? In regard to 260 Shoreline Hwy, this site is actually in Richardson's Bay. Over the years fill has been added to the land; however, climate change is very likely to cause tides to overcome this land sooner rather than later. The only kind of building suitable on this site would be a community of houseboats which was the original use of the parcel. Is that what the Board is contemplating?

I am amazed at the lack of common sense and care for your future constituents as indicated by these two choices. Both would be likely to present serious safety and property issues for any future occupants of housing of any type on the properties.

Linda Rames  
240 Morning Sun Ave.  
Mill Valley, CA 94941

June 27, 2022

Dear Marin County Community Development Agency:

The Marin Organizing Committee (MOC) was established in 2009 and has 23 dues paying member institutions throughout the County of Marin. We have a long-standing team focused on creating more affordable housing in Marin County as well as furthering protections for renters.

MOC would like to commend the County staff for their community outreach process as well as conducting a critical evaluation of the programs and policies from the 2015 Housing Element.

The County staff have done a thorough analysis by beginning with “Housing Goals”, which includes the following: (1) using land efficiently; (2) supporting a mix of housing types, affordability levels, density, and design; (3) creating and maintaining the local governmental capacity to respond to housing needs effectively over time; and (4) eliminating racial bias, and historic housing discrimination based upon race.

It is important to point out that these policies are not simply words on paper. These policies are organized around the County’s four central “Housing Goals”, where the primary emphasis is on “facilitating development of housing affordable to lower and moderate-income households in Marin.”

The State allocated a need for 3,569 units to Marin County under RHNA. Given projected ADU’s and entitled projects, the County has met 475 of the RHNA, leaving 3094 units (1,458 lower income, 428 moderate income, and 1,208 above moderate income units). The County staff have done a thorough analysis and have identified an inventory of sites with potential for redevelopment over the eight-year planning period. This inventory includes sites the “can accommodate additional housing (689 units) under current Countywide Plan (CWP) and Development Code. The inventory also includes sites that will be rezoned/upzoned concurrent with this Housing Element update. Sites identified for rezoning/upzoning can accommodate 2,677 units (see Table H-5.1).

We commend the policies articulated by the Marin County Planning Department, as well as and their goal to complete the redesignation and rezoning of sites by January 31, 2023.

We now address the specific parts of the County's 2023-2031 Housing Element:

**Program 1: Adequate Sites for RHNA and Monitoring of No Net Loss.** This program would have the County rezone 1,445 acres by January 31, 2022 to provide enough land appropriately zoned to support the RHNA. It would also revise the County Wide Plan (the County's General Plan) to specify allowable densities, minimum and maximum number of units allowed or required, and assign objective design standards that will be used to evaluate the design aspects of projects. This program is important because it adjusts the rules to assure that there is enough land properly zoned to support RHNA. It also helps to streamline the approval process by making objective design standards available.

*The Marin Organizing Committee recommends that the rezoning and CWP amendments must be completed by January 31, 2023.*

**Program 2: By-Right Approval.** This program states that per Government Code section 65583.2, sites identified for lower income housing in the 4<sup>th</sup> and 5<sup>th</sup> cycle Housing Elements shall be subject to by-right approval for projects that include 20 percent of the units affordable to lower income households. This is important because it streamlines the approval process and eliminates "discretionary" review. In other words, projects would be evaluated against a specific measurable set of standards and must be approved if they meet the standards. Rules changes to implement this program are to be made by December 2022.

This program also says this the County may extend this program to projects that include 20 percent of the units affordable to homeowners at 60 percent AMI or to renters at 50 percent AMI; and 100 percent affordable projects on any Housing Element sites.

This program is important because it shortens the review process and adds certainty. These factors in turn make affordable housing a more attractive and achievable alternative for landowners and developers.

*The Marin Organizing Committee recommends that the County implement this program including the option by December 2022.*

**Program 4: Accessory Dwelling Units.** The draft Housing Element relies heavily on ADU's to meet the RHNA. However, MOC has learned that the ADU application and approval process is slow and arbitrary. Program 4 proposed to correct this by –

- Dedicating a specific page on the County website to provide information and resources for ADU construction.
- Dedicating an ombudsman position to help applicants navigate the predevelopment phase of ADU construction.

- Developing an ADU construction guide to clarify the permit application process and requirements.
- Providing financial assistance to income-qualified property owners to build ADUs using State funds (such as Cal HOME funds).

*The Marin Organizing Committee recommends this program which has the potential to correct problems MOC has identified in the Accessory Dwelling Unit program.*

**Program 6: Efficient Use of Multi-Unit Land.** The County permits single family homes in multi-family zoning districts; this reduces the amount of land available for affordable housing. This program would mandate minimum densities for land zoned for multi-family housing which will encourage landowners to develop their properties to levels consistent with RHNA. This program would also create a combining district that would apply objective design standards to projects, thereby adding certainty to the application process. Certainty in the review process encourages landowners to develop their properties consistent with RHNA and other Housing Element policies.

*Marin Organizing Committee is in favor of this program because it would assure valuable land resources that support affordable housing are not underutilized or wasted.*

**Program 8: Development Code Amendments.** This program would require amendments to the Development Code (zoning ordinance) that would promote development of affordable housing in mixed-use projects (projects that combine commercial and residential uses on a property) including Increasing the allowed density – to 30 units per acre– and allowing building heights up to 45 feet.

*MOC supports this policy because it increases the feasibility of locating housing on mixed-use sites, including projects with affordable housing.*

**Program 13: Reasonable Accommodation** This program would have the County make changes or exceptions to its rules on a case-by-case basis to accommodate the special needs of persons with disabilities.

*MOC supports this program because it would address some of the unique housing needs of people with disabilities.*

**Program 15: Housing for Farmworkers and Hospitality Workers.** By December 2025, the County will develop strategies for addressing farmworker and hospitality worker housing, with the goal of increasing housing for these employees by 20 percent.

*MOC supports this program which would create affordable housing for a particular class of predominantly lower-income workers who work in these jobs.*

**Program 16: Project Homekey.** This program sets a goal of developing 20 Homekey units over 8 years.

Marin Organizing Committee supports this program which has proven to be the most effective way to combat people experiencing homelessness or the risk of being precariously housed.

**Program 17: Housing for Seniors.** This program would have the County expand housing services for seniors including home matching and development incentives for various senior housing options including affordable housing .

MOC supports this program because the fastest growing demographic in this County are senior citizens, many who are living on fixed-incomes and living alone.

**Program 23: Preservation of At-Risk Housing.** 61 units of affordable housing are at risk of converting to market-rate. This program would have the County make various initiatives to assure that these units and other affordable housing are preserved.

MOC supports this program because it would help to maintain the County's limited stock of affordable housing.

**Program 24: Inclusionary Housing.** Under this program, the County would work with the cities and towns to develop consistent standards for requiring affordable units in proposed housing projects.

The Marin Organizing Committee supports this program as a way to strengthen inclusionary programs throughout the county and thereby increase the stock of affordable housing.

**Program 25: Incentives for Affordable Housing.** Under this program the County would continue to offer incentives to build affordable housing such as financial assistance and density bonuses.

MOC supports this program as a way to increase the stock of affordable housing.

**Program 26: Below Market Rate (BMR) Homeownership Program.** The County would continue to operate this program that provides 90 for-sale units at rates affordable to lower and moderate-income households.

The Marin Organizing Committee supports this program as a way to provide home ownership opportunities to lower income households.

**Program 27: Community Land Trusts.** Community land trusts (CLTs) are a way to provide a form of homeownership at below-market rate costs. There are currently two CLTs in the county. Under this program the County would support the formation of additional CLTs.

MOC supports this program as a proven way to provide home equity opportunities for lower income households.

**Program 28: Affordable Housing Funding Sources.** Under the program, the County will continue to pursue funding opportunities from State and Federal housing programs to facilitate the development of 200 affordable housing units.

Marin Organizing Committee supports this approach to increasing the affordable housing stock because the cost to build affordable multi-family housing in the county is exorbitant.

**Program 30: Fair Housing Outreach and Enforcement.** The County partners with Fair Housing of Northern California in fair housing education and enforcement. This program would have the County expand its enforcement outreach to include Homeowners Associations, realtors, property managers, and brokers, as well as individual property owners.

MOC support fair housing enforcement because we have heard the stories of people within our institutions that housing discrimination does exist in the County of Marin .

**Program 31: Tenant Protection Strategies.** Under this program, the County would explore the following initiatives to protect tenants:

- Rent stabilization
- Just cause for eviction
- Local relocation assistance
- A tenant commission
- Right to purchase
- Tenant bill of rights

The County would begin community outreach to explore these options in 2023 and adopt appropriate programs in 2024.

While MOC supports this program to expand protections to tenants who have limited choices of where to live because of the small number of available rental units but it doesn't go far enough. Strengthening Marin's just cause ordinance must address the no-fault just causes that represents the majority of tenant evictions and displacement. These include owner move-ins, substantial remodels, and the ambiguous "withdrawal" from the rental market. A local just cause ordinance should include policies to address this displacement that is of no-fault of the tenant, such as longer eviction notice periods, higher relocation costs for displaced tenants, and the right of the tenant to return to the unit at the same rent at the time of displacement. We also urge committed timelines to enacting rent stabilization and a tenant/community right to purchase program. We do applaud the inclusion of a tenant bill of rights and a



tenant commission, however again, we believe the state will require much more specificity than currently reflected in this draft.

**Quantified Objectives:** Pursuant to State Law, for the 2023-2031 planning period, the County has done a “**Requisite Analysis**” and listed quantified objectives to estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period. Per State requirements, “the quantified objectives do not represent a ceiling on development, but rather set a target goal for the jurisdiction to achieve, based on needs, resources, and constraints.”

MOC believes that requiring quantifiable objectives is important in reinforcing the County of Marin’s efforts to meet its stated goals for the 2023-2031 planning period, to further the construction, rehabilitation, and/or preservation of affordable housing.

### **Creation of Regional Authority Focused on Affordable and Workforce Housing**

**RECOMMENDATIONS R1.** No later than December 31, 2022, the Marin County Board of Supervisors and Marin’s city and town councils should jointly create a regional authority or empower an existing authority such as the Transportation Authority of Marin, to coordinate affordable and workforce housing policy on a countywide basis.

MOC believes that this recommendation has merit because of the number of cities and towns throughout Marin. An example is the Bay Area Housing Finance Authority (BAHFA) which is the first regional housing finance authority in California. This regional authority has the potential to raise hundreds of millions of dollars to help address affordable housing and housing stability. The goals are to protect current residents from displacement; preservation of existing housing affordable to lower and middle-income residents; and production of new housing at all income levels, but especially affordable housing.

Sincerely,

Ron Brown, Congregation Kol Shofar

Bob Pendoley, Marin Environmental Housing Collaborative (MEHC)

Linda Haumann, Unitarian Universalist Congregation of Marin

Jan O’Brien, Mt. Tam United Methodist Church

Jeff Bialik, Marin Interfaith Council

Patti Breitman, Gan Halev

Lisel Blash, Marin Environmental Housing Collaborative (MEHC)

Lucie Hollingsworth, Legal Aid of Marin

John Reynolds, First United Methodist Church of San Rafael

Judith Bloomberg, Congregation Rodef Sholom

**From:** [Sackett, Mary](#)  
**To:** [Tanielian, Aline](#)  
**Subject:** FW: In support of SB9 and larger ADU's in Los Ranchitos  
**Date:** Thursday, June 30, 2022 9:58:33 AM

---

---

**From:** emlygren@gmail.com <emlygren@gmail.com>  
**Sent:** Thursday, June 30, 2022 9:17 AM  
**To:** Sackett, Mary <MSackett@marincounty.org>  
**Subject:** In support of SB9 and larger ADU's in Los Ranchitos

Emilie Lygren would like information about:

The Los Ranchitos Improvement Association (LRIA) wants to stop SB9 and limit ADU size in the neighborhood. I am a landowner and resident and I disagree with the LRIA on this. Yet I share some priorities with the LRIA and the concern of residents who oppose large-scale development. I too like the quiet feel and space for agriculture, and want to support wildlife and manage fire safety. But I don't think any of these things are at odds with supporting SB9.

There's big difference between allowing to create housing by adding a single-family home or ADU and development in the form of large apartment buildings. SB9 would not equate to an influx of massive housing developments. Many landowners would not choose to build. County Planning screens new projects, helping manage fire safety. Large lots and wide streets mean new projects don't have to impact the rural vibe, stop agricultural activities, or clog evacuation routes. Please consider applying SB9 and not limiting ADU size in Los Ranchitos



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Susan Scott

### Community You Live In/Represent

inverness

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

syscott@sonic.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

I see the county property on Sir Francis Drake 1+mile north of the town of Inverness is still listed for 20 units of high cost housing. All county land should go to affordable housing! If the County donated the land to non-profit developers the housing can be built- and sold or rented- affordably. Our community doesn't need any more high priced housing if we're going to survive as a real community w families living and working here! County land needs to support low cost housing and the BOS, as stewards of County land, need to correct the designation of this parcel.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Meehyun Kurtzman

### Community You Live In/Represent

Lucas Valley Marinwood

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

meehyun@me.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-7, C-18

### Comment or Suggestion

Please submit for the record.

7 Mount Lassen is located immediately adjacent to the Miller Creek. This is currently an office complex which serves as a much needed resource in unincorporated Marin. To renovate an office complex to residential use, will violate your development regulations for sites adjacent to any waterway. Please provide a project based EIR, to be distributed to the local Lucas Valley Homeowner's Association for their review, outlining its impact on the community.

1501 Lucas Valley Road is one large parcel of land overlooking the aforementioned LVHA. We collectively do not approve of any zoning changes to this land without a project based EIR and comments and input by the community. The owners of this property have been brazen enough to build structures without a planning review nor building permits. There is no record of permits filed for this property as of today in the Marin County Permit online records. As it is now, this owner can only build four separate units on this parcel of land, with proper approvals from local jurisdiction. If you allow, deviations from the rule of law and regulations, our Lucas Valley environ will be harmed.

Rotary Field open space: Please be advised that the open space for this site has been approved to remain an open space resource for the community for many years. Again any development in this field shall have its own project based EIR to inform the nearby residents as to the impact it will have to build 80 units on this site.

More importantly, a cumulative impact of 170+/- units on two intersections of Lucas Valley Road and Mount Lassen and Lucas Valley Road and Mount Muir Court needs to be addressed for traffic, wildfire evacuation, water and sewer needs, and numerous other factors that would impact the health and safety of residents living nearby.

Also please refer to my earlier comment on the current Housing Element on record.

Thank you.

Meehyun Kurtzman  
Lucas Valley Homeowner's Association - Zoning  
Committee member



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Ken Levin

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

klevin13@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-10/11

### Comment or Suggestion

Inverness sites (27) : all are designated Above Moderate Income

Point Reyes Station sites (153) : all are designated Lower Income

The rubric for determining development potential based on lot size is basically flawed and does not take into account values and motivation of local residents. It reflects the common economic thinking of the commercial real estate/developer industry and does not allow for local solutions that involve creative community building.

Point Reyes Station residents welcome neighbors of all economic classes. Inverness residents should be given the opportunity to do the same.



**From:** [Susan Simpkin](#)  
**To:** [housingelement](#)  
**Subject:** 2023-2031 Marin County Housing Element: COMMENT FORM from Susan V. Simpkin, Mill Valley, CA  
**Date:** Thursday, June 30, 2022 12:42:32 PM

---

To the Board of Supervisors and Planning Department,

I'm very upset by the RHNA, the punitive laws that enforce them, the loss of local control and the control that is potentially being handed over to private developers who put profit over safety.

I am angered and disgusted at ABAG's utter disregard for the safety of residents and their disrespect of valid appeals. Their actions completely contradict their Plan Bay Area 2050 goals and assurances that one size does not fit all, and that high risk areas would be spared development. Even with the new state laws, these factors should have been considered together with appeals and distributions.

ABAG continues to ignore both the fire hazards and the complete lack of safe evacuation routes due to constantly congested roads and highways in Marin. The numbers assigned to build cannot be met without putting a great number of people, including the new residents, at risk.

Ignoring the realities of each municipality, ABAG has failed to consider the cumulative effects of building. 865 new units in Mill Valley does not just add 2000 people to an evacuation. It also blocks egress from the heavily populated unincorporated areas and their new residents, rippling all the way back to the coastal areas — including the daily population of employees and visitors to Mill Valley.

Mill Valley roads were built with the consideration that each household would have approximately 6 trips a day in and out of town. With the daily workforce (tourists, delivery trucks, retail workers, restaurant workers, housekeepers, gardeners, tradespeople, etc.) that enter Mill Valley that number of trips has skyrocketed. There could be 20,000 plus people stuck in a miles long, gridlocked fire-trap towards two chronically congested 101 exits in Mill Valley.

We are experiencing fires in Marin on almost a weekly basis, some already requiring small scale evacuation. On Monday, June 27, 2022 a fire at the Novato/Petaluma Narrows, a low density residential business area, backed up traffic on 101 for hours. This fire together with a 3-car accident on Hwy 37 gridlocked traffic all the way to San Rafael for hours. I am terrified to consider what will happen if a fire initiates in a high density residential area with limited egress and ingress. To date, we have just been lucky.

The Marin Community Wildfire Protection Plan (CWPP) 2020 describes our situation in stark terms. It also contains very relevant risk assessment maps, unlike CAL FIRE'S, which are totally out of date, <https://www.arcgis.com/apps/MapJournal/index.html?appid=6b55c55b3f7d41fe980ef5e65ae881a6>

My family is emergency conscious. Our Scott Highlands neighborhood in Mill Valley has been a FireWise community for many years. Our family and our neighbors are dedicated to fire mitigation and preparedness. We have spent thousands of dollars removing vegetation and trees to attempt to create a safe fire cordon around our home. Our MVFD and Southern Marin Fire Dept. have made great outreach efforts to residents throughout Mill Valley and Marin. The facts are that the roads were not built for the ever increasing volume of traffic and high density living. The trees and hills that create the beauty of the area also create a fire trap.

It is disgusting and despicable that ABAG is choosing to ignore all the efforts of citizens and first responders all to be undone by the reckless development that is demanded. Besides the safety issues, the punishments that the cities and counties are being threatened with do not comport with reality.

The San Francisco Chronicle today highlighted the impossibility of using private developers to make our RHNA. [San Francisco housing development slowed due to high costs](#) They just won't build what doesn't "pencil out." The system is rigged for failure. The state should take responsibility for low income housing. I hope the Board joins other communities and pushes back.

Minimally, ABAG needs to re-hear the appeals and balance them against reality. RHNA has been based on census and other dry financial data. But our situation is dire and dynamic. HCD needs to adjust expectations in a world of climate-change-fueled year round fire season and extreme drought, during a pandemic that has upended everything, including interest rates, plus the costs and supply of materials and labor.

The process (already found faulty and is still under state audit) should be halted, even under threat of fines and receivership.

I know that none of this was of your making. But please, do more to protect us than what was provided in the Hybrid Plan. There will be a crisis of loss of life and property if our government representatives abrogate their responsibilities and take the path of least resistance

I appreciate your consideration of all of these factors. I recognize that you all are

between the proverbial “rock and hard place” and that you’ve all been doing your best.

Sincerely yours,

Susan V. Simpkin  
Mill Valley, CA  
(415) 888-3789



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Michael Folk

### Community You Live In/Represent

San Anselmo

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

mikefolk@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-18

### Comment or Suggestion

As the owner of the properties in San Anselmo at 404 San Francisco Blvd, 4 Sacramento Ave, 60 Sacramento Ave and in contract to purchase 1 Sacramento Ave, we are thankful for inclusion in county's Housing Element site inventory. We are actively planning for the redevelopment of the site into a multi-family rental housing. This project is not seeking public funding or grants to support affordable housing construction. We are planning to adhere to the current county standard of 20% affordable of the total number of units in the project. Our project is not financially viable at 56

affordable units as projected for our site on the inventory list.

**From:** [Remick Hart](#)  
**To:** [housingelement](#)  
**Subject:** General comment  
**Date:** Thursday, June 30, 2022 1:22:32 PM

---

Housing should not be placed in unincorporated west Marin where there are no good paying jobs available, medical services are not adequate, fire and emergency is marginal at best, water is limited, septic systems are widely known not to meet current health standards. Housing should be placed where all services are in close proximity.

Thank you,

Dean Hart

West Marin

Sent from my iPhone



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Mark Inbody

### Community You Live In/Represent

Strawberry (Eagle Rock Association)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

markinbody47@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

19 (North Knoll), 21 (Pan Pacific)

### Comment or Suggestion

I write on behalf of the Eagle Rock Association as well as my own behalf, to reiterate the comments and objections I stated in writing and orally at prior workshops/hearings. No rights are waived under the Government Code. My objections include but are not limited to:

1. There has been insufficient outreach to the community. A resident has to affirmatively sign up for electronic notification for the proceedings/events relating to the Housing Element. Our older neighbors that do not have

easy internet access have no idea what is happening.

2. There is a disproportionate allocation of housing to Strawberry, a small community with the highest density of housing in the County.

3. There has been inadequate actual investigation of the sites. The Pan Pacific site is on a 37 degree slope. There is no such road as "Saint Thomas Drive". I believe the consultants that identified the sites never saw them "boots on the ground." Supervisor Moulton-Peters has not accepted invitations to see the sites herself. Actual investigation would demonstrate the inappropriateness of these sites for high-density housing.

4. The sites are both, in fact, inappropriate for high density housing. They are not "vacant", they have natural vegetation on serpentine geology. They abut the Tiburon Open Space and Ring Mountain, respectively. The slope is extremely steep, particularly for the Pan Pacific property. There is only one road for ingress and egress, North Knoll. The additional traffic is one problem, but the single option for egress in the event of a wildfire is a clear safety issue. There are no sidewalks, and the current residents walk/hike in the street. For these reasons, the Pan Pacific site was REMOVED from the site list in the last HE cycle.

5. There are better options for development, both in Strawberry and outside of it. These sites are NATURAL ECOLOGY. The Strawberry shopping center and Seminary should be on the list, if they must, ahead of North Knoll and Pan Pacific. Re-use of existing sites is a clearly better option from an environmental standpoint. No EIR has been issued for either site to date.

6. Finally, the desire of the residents, Strawberry Community Plan, and characteristic of the neighborhood should be respected. Development should not be shoved down our throats from either the state leadership, ABAG or our own Supervisor.

Respectfully, Mark Inbody





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Toni Shroyer

### Community You Live In/Represent

Novato

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

tonishroyer@hotmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

Novato has more than their fair share of high density housing/apartments. What is not being addressed is our infrastructure, our water, schools and public safety. The increase in traffic will be horrific.

What is not being acknowledged is the incredible amount of money developers will be making and unions that are building the poorly constructed units. Corporate nonprofits developers do not pay real estate taxes and drain our resources yet make millions off the backs of the hard working taxpayer.

The sites in Novato are too dense and we don't have enough jobs for the new residents—if the residents need to work.

It's sad that our politicians have not provided

better solutions for us.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Shepherd and Dorothy Burton

### Community You Live In/Represent

Marinwood-Lucas Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

burtonentp@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

We understand and support "...the primary objective of the Marin County Housing Element (MCHE) ... to plan environmentally and equitably sustainable communities by supplying housing affordable to the full range of our diverse community and workforce" with "Goal 1 [to] use land efficiently (emphasis added)... to meet housing needs and implement smart and sustainable development principles." However, in the light of certain proposed sites we seem to disagree on the report's meaning of "sustainable communities" and efficient use of land.

As Marin urbanizes—increases its housing density in pursuit of increasing housing affordability—we argue that county planners and decision makers

not diminish Marin's livability by using park land to build more housing. A park experience rejuvenates suburban dwellers, provides a sense of peacefulness and tranquility, and enhances contemplativeness and community. Existing public parks cannot be excluded from the County's objective of "equitably sustainable communities."

What brought this issue to our attention is the inclusion of Parcel 164-640-01, 2 Jeannette Prandi Way, which is 33 acres, zoned PF/PF and "includes existing Probation Department facilities, Marin County offices, and an open recreational area." The draft MCHE proposes using ~30 percent of this parcel for 80 affordable housing units on 10 acres, while "preserving the recreational area."

All but approximately 9 acres of the 33 acres of parcel 164-640-01 contains either roads, easements, buildings or a cemetery. County staff and its consultants indicated during the County Road Show that existing buildings would not be demolished. Without removing some existing structures only the "the recreational area" is available for proposed housing. (We used Google Maps area calculator to calculate the area of LVP.)

We remind the draft MCHE authors that what is referred to as "recreational area" is known to residents of Marinwood-Lucas Valley and to Marin County Parks and Recreation as Lucas Valley Park, which is maintained by Measure A funds (numerous county documents and websites support this. (See County Parks Strategic Plan (2008) as well as <https://www.parks.marincounty.org/parkspreserve> and a sign posted at the northeast entrance to LVP)

If it walks like a duck and quacks like a duck it's a duck. And so it is with one-third of Parcel 164-640-01; it was constructed in the middle '90s as a park, is used as and called a park, and maintained with money designated for parks. So it's a park.

This is why we say to the proposal for 80 residential units designated for Parcel 164-640-01 in Marin County's draft Housing Element, "Not In Anyone's Park."

We believe replacing parks with housing, whether market rate or affordable housing, would be a perversion of the principles of "equitable sustainable development" and "efficient land use."

Replacing a park with low-income housing, in light of the MCHE's draft stated objective and goal, is, in our judgement, no more than a veritable piñata bursting with goodies for builders.

A version of these comments has also been provided with supporting attachments to Supervisor Connolly via email.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Scott Takaoka

### Community You Live In/Represent

Lucas valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

scotttaka@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

The planned zoning for 1501 Lucas valley rd is building without permits and no env impact report. 7 Mt lassen is right next to Miller creek. The rotary open space has been designated so for many years. All are next to Miller creek where salmon go to spawn. It's a delicate habitat and needs to be evaluated. We know that there needs to be a 50 ft setback from the creek. Gave consideration on auto fuel and oil runoff into the creek. With 170 units in the plan it could have a big impact on the environs.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Amy Kalish

### Community You Live In/Represent

Unincorporated Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

amylkalish@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

To the Planning Department and Board of Supervisors

The housing plan put forward as a RHNA cycle and backed up by punitive state laws is a travesty. Instead of working with local governments to achieve something real, that could help those most in need of housing, Sacramento has chosen a path that puts us all at odds with our own state government.

The Planning Commission and the Board have dutifully taken on the Housing Element, but there are many flaws that make it's goals unattainable and will not result in HCD certification.

The Housing Element list contains a number of questionable sites, such as businesses that do not plan to transform into housing. I know the overage is supposed to account for this.

The County is not in the business of building, and has no legal authority to tell developers what to do, only to point out the spaces they can take advantage of. This means that whatever percentage of low income housing is finally included in plans is up to them. They are currently reluctant to move forward anyway, when interest rates are high, and labor and materials are scarce and expensive. Private developers are interested in their bottom line. They do not see building low income units to their advantage, even with bonuses. The county has had to upzone agricultural land for use as above moderate income housing, and was denied ability to let the numbers rise elsewhere in favor of more low income housing.

Why is the county forced to point out land where housing for the wealthy must be built? Isn't this what the whole historical social-equity part of RHNA is supposed to prevent?

If builders don't configure their projects to match the mandates, the county is punished. If they don't finish on time, the county is punished.

The San Francisco Chronicle just highlighted the impossibility of using private developers to make our RHNA. San Francisco housing development slowed due to high costs. Developers won't build what doesn't "pencil out."

The system is rigged for failure. The state should take responsibility for low income housing. I hope the Board joins other communities and pushes back; there is currently an active lawsuit with legs going after the legality of SB9, with space for more local governments to sign on. I hope you will consider joining.

Minimally, ABAG needs to re-hear the County appeal and balance numbers against reality. Historically HCD has relied only on census and other dry financial data. But in 2022, our situation is dire and dynamic.

HCD needs to adjust expectations in a world of climate-change-fueled year-round fire season and extreme drought, during a pandemic that has upended everything. Our population is currently shrinking, large companies are leaving the state, telecommuting has changed work habits, and so on. People are still not willing to use public transportation at pre-Covid levels.



The HCDs RHNA process (already found faulty and still under state audit) should be halted, even under threat of fines and receivership.

I know that none of this was of your making. But please, do more to protect us than what I see in the Housing Element Plan. Otherwise there is eventually going to be a crisis of life and property that no one wants.

I appreciate your consideration of all of these factors. I can see from the meetings that it has been a difficult process, and not what you thought you'd be doing as Supervisors and Planners. It was obvious from the beginning that you would not be able to exclude hazards from the Housing Element if the numbers were to be made.

For the most part I've watched a Board trying hard to do their best to both protect constituents' safety and protect the county from severe penalties. But in the end, your plans will provide neither.

I remain discomfited.

Sincerely,

Amy Kalish  
7 Walsh Drive, Mill Valley, CA 94941  
415-383-9115



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Td Strada

### Community You Live In/Represent

Lucas Valley marinwood

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

nick.strada@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Please submit for the record.

7 Mount Lassen is located immediately adjacent to the Miller Creek. This is currently an office complex which serves as a much needed resource in unincorporated Marin. To renovate an office complex to residential use, will violate your development regulations for sites adjacent to any waterway. Please provide a project based EIR, to be distributed to the local Lucas Valley Homeowner's Association for their review, outlining its impact on the community.

1501 Lucas Valley Road is one large parcel of land overlooking the aforementioned LVHA. We

collectively do not approve of any zoning changes to this land without a project based EIR and comments and input by the community. The owners of this property have been brazen enough to build structures without a planning review nor building permits. There is no record of permits filed for this property as of today in the Marin County Permit online records. As it is now, this owner can only build four separate units on this parcel of land, with proper approvals from local jurisdiction. If you allow, deviations from the rule of law and regulations, our Lucas Valley environ will be harmed.

Rotary Field open space: Please be advised that the open space for this site has been approved to remain an open space resource for the community for many years. Again any development in this field shall have its own project based EIR to inform the nearby residents as to the impact it will have to build 80 units on this site.

More importantly, a cumulative impact of 170+/- units on two intersections of Lucas Valley Road and Mount Lassen and Lucas Valley Road and Mount Muir Court needs to be addressed for traffic, wildfire evacuation, water and sewer needs, and numerous other factors that would impact the health and safety of residents living nearby

Any and all development in Lucas Valley marinwood will threaten critical habitat for endangered Central Coast steelhead.

Furthermore we simply don't have the water for this level of high density development.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Michael Tar

### Community You Live In/Represent

Lucas Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

mike.tar@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-7, C-18

### Comment or Suggestion

Giving us less than five minutes to respond is unethical and immoral.

Please submit for the record.

7 Mount Lassen is located immediately adjacent to the Miller Creek. This is currently an office complex which serves as a much needed resource in unincorporated Marin. To renovate an office complex to residential use, will violate your development regulations for sites adjacent to any waterway. Please provide a project based EIR, to

be distributed to the local Lucas Valley Homeowner's Association for their review, outlining its impact on the community.

1501 Lucas Valley Road is one large parcel of land overlooking the aforementioned LVHA. We collectively do not approve of any zoning changes to this land without a project based EIR and comments and input by the community. The owners of this property have been brazen enough to build structures without a planning review nor building permits. There is no record of permits filed for this property as of today in the Marin County Permit online records. As it is now, this owner can only build four separate units on this parcel of land, with proper approvals from local jurisdiction. If you allow, deviations from the rule of law and regulations, our Lucas Valley environ will be harmed.

Rotary Field open space: Please be advised that the open space for this site has been approved to remain an open space resource for the community for many years. Again any development in this field shall have its own project based EIR to inform the nearby residents as to the impact it will have to build 80 units on this site.

More importantly, a cumulative impact of 170+/- units on two intersections of Lucas Valley Road and Mount Lassen and Lucas Valley Road and Mount Muir Court needs to be addressed for traffic, wildfire evacuation, water and sewer needs, and numerous other factors that would impact the health and safety of residents living nearby.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

April Post

### Community You Live In/Represent

Tamalpais Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

april\_post@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

I want to add my comments to those of Amy Kalish and other community leaders who have spent a good deal of time exploring the topic of the newest Housing Element. I strongly encourage you to push back on these outrageous housing numbers. There are limits to the carrying capacity of our lands. Water infrastructure, inadequate roads and safety concerns from fires and sea level rise are among some of the top concerns for the people who LIVE HERE NOW. Let's not build a worse disaster by increasing the density of people who will have to suffer from these unresolved conditions. Not only do you owe it to us to address the existing conditions, but it is immoral to add more people to the situation.

Also, these numbers from ABAG cannot be supported. They have not shown how there is a sudden huge need for all this building. A tiny percentage of what is being proposed will be affordable, so we aren't even close to addressing that issue. The laws passed on the State level and signed into law by Newsom, end runs the will of the people by avoiding putting it on the ballot for a vote of the people. It completely guts generations of planning that does reflect the will of the people and their wishes for the future of the lands where they live. I served on the TDRB for 11 years and the People have been very careful to delineate exactly the kind of development is appropriate for our area. We are loosing our Democracy with laws like this that rip away the careful planning and safety concerns, just to give Big Development free reign, once again as in the 50's and 60's, to ignore what is appropriate and do whatever they want. This will stand if you do not push back!

I am deeply concerned that the costs of the infrastructure improvements will not be paid for by developers, but foisted off on the residents, who didn't have a chance to vote on that, either. Many of us are retired or not wealthy, and cannot pay endless tax increases. What about those of us who are here now who are at low to moderate income levels? How will we be protected from taxes that will drive us out of our homes? In Tam Valley, for example, our sewer has quadrupled because of improvements to our sewerage plants. This is a tiny part of what will be needed to accommodate all these new housing numbers...And what about next planning cycle?? There is no end to what will be demanded. Please push back! MARIN CO DOES NOT WANT TO BECOME A SPRAWLING CITY SCAPE! Thank you for your attention to this important issue that will effect Marin FOREVER!~A



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Terri Leker

### Community You Live In/Represent

Santa Venetia

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

terri.leker@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Page Number

Multiple pages

### Comment or Suggestion

To the Marin County Board of Supervisors and Planning Department:

My husband and I are longtime residents of Santa Venetia in unincorporated Marin County, and members of the Santa Venetia Neighborhood Association (SVNA). We and our neighbors remain gravely concerned about the implications of the Draft Housing and Safety Elements on our ability to evacuate in the event of emergency (the likelihood of which increases with the addition of approximately one thousand new residents). We



ask again that you consider the magnitude of risk that this unfettered new development places on Santa Venetia, which relies on a single road in and out and is already crippled by daily gridlock. We also wish to call out the astronomical and disproportionate number of units that our neighborhood has been asked to absorb.

It is indisputable that much of the proposed housing is sited in areas at high risk of fire, with inadequate evacuation routes; nor does it appear that these draft documents were created in partnership with our first responders or that their expert and vital opinions were considered. The Marin Community Wildfire Protection Plan (MCWP), prepared in December 2020 for the Marin County Fire Department, is an excellent and thorough report detailing the extreme challenges of fire management in WUI environments. The MCWP addressed several critical issues, including emergency egress:

An article in the Marin Independent Journal (August 23, 2019) discussed how several communities in Marin could face major traffic during a disaster. The article was based on research by StreetLight Data Inc. that was inspired, in part, by the gridlock faced by residents of Paradise, California, during the Camp Fire in 2018. Researchers looked at communities of 40,000 residents or less across the country, showing how traffic would flow during an emergency and pointing out potential bottlenecks. Of the 30,000 communities analyzed, about 800 had scores that were three or more times the national average, including 107 in California, indicating that residents in California have fewer options than average when evacuating during an emergency. Twenty-two of the towns and cities are in the Bay Area, and of these, seven are in Marin County. (4.8 Roadways and Streets, p. 28)

On this same page, MCWP cites a map from StreetLight Data Inc. which identifies Santa Venetia as one of only 675 U.S. communities with limited evacuation routes:

<https://www.streetlightdata.com/limited-emergency-evacuation-routes-map> The maps used in the June 2022 Draft Safety Element also demonstrate great risk to Santa Venetia from liquefaction, seismic shaking amplification, historic flooding, and sea level rise. Any single one of these risk factors will severely impact emergency evacuation on North San Pedro, the sole route in and out of Santa Venetia.

The Draft Safety Element Section EHS-2.4.c: Identify and Improve Deficient Evacuation Routes, has a stated goal to:

Implement findings of the Marin Wildfire Protection Authority Evacuation Ingress-Egress Risk Assessment. Use the visual risk assessment and risk factors to identify and prioritize existing deficient evacuation routes. Improve evacuation routes based on the prioritization ranking, but also in consideration of improvements required for a transportation network which is resilient to flooding and inundation from sea level rise.

However, the corresponding Implementation Table (Figure 2-21: Goal EHS-2. Disaster Preparedness, Response, & Recovery Program) states that meeting this goal “Requires additional funding.” We do not believe that even a single new home should be approved before funding is secured.

Finally, the Draft Safety Element states:

A regional approach to wildfire planning and response is addressed in the Marin County Multi-Jurisdictional Local Hazard Mitigation Plan and the Marin Community Wildfire Protection Plan (CWPP). The Marin Wildfire Protection Authority (MWPA), established in 2020, coordinates and funds 17 local member agencies to create more fire adapted communities based on the priorities outlined in the CWPP. Additional information detailing wildfire hazard in the County and detailed descriptions of the CWPP and the MWPA are provided in a technical memo supporting this Safety Element. (15)

We object to the use of the “supporting” in this context, as it implies that the recommendations of the CWPP and MWPA support the conclusions of the Draft Safety Element, when, in fact, detailed descriptions of these plans are simply provided as a supplement to the Draft Safety Element.

With regard to fire, Map 2-15 (Fire Hazard Severity Zones) is dated August 15, 2021, but cites CALFIRE 2007 as its source. We believe that some of the hazard maps in use are more current, but can you confirm that no 2007 FHSZ CAL FIRE maps are still in use?

We also take issue with the loss of local control over how our communities are planned and developed. Rather than defining this as a simplistic NIMBY vs YIMBY argument, we should call it what it is: a transfer of power from communities to for-profit developers. The current process, along with SBs 9 and 10 is a gross overreach to overturn local autonomy and planning decisions and is in direct opposition to the wishes of most Marin residents. The majority of mandated units would be at or above market rate, which does not ameliorate the most urgent need for truly affordable housing.

We have written before to state our concerns,

none of which were lessened by the series of Zoom “workshops” where MIG representatives could not answer questions about the degree to which the Draft Housing and Safety Elements, RHNA, ABAG, and the new state bills were interdependent, how water would be supplied, or how critical infrastructure needs would be addressed. As we have noted previously, many Marin residents are still unaware that this process is underway and have yet to even formulate questions or objections.

In addition to everything that has already been stated, we want to add that it is a foregone conclusion that we will never reach compliance with the RHNA mandates, whether we attempt to do so or not. Our “success” is completely dependent upon multiple unstable factors, including a reliable supply chain for the innumerable building materials — lumber, concrete, metal, cinder blocks, drywall, glass, etc. — required to construct this amount of housing. Further to this, can you begin to calculate the amount of water necessary to produce the essential concrete and cinder blocks? Where will we find the enormous labor force to build thousands of new housing units? In Corte Madera alone, Nugget Markets has for weeks advertised dozens of unfilled positions, from checker to meat clerk, for which they are offering a \$1000 sign-on bonus. Now consider that all of this development will take place simultaneously throughout the state. Regardless of our efforts, we will most certainly be penalized for not meeting our quotas, which, again, is to the benefit of the developers who will then proceed without environmental review.

After reading the MCWP and related reports, we will state the obvious conclusion that should have been drawn by the Draft Safety Element: The multifold hazards to the residents of Marin County are so great and insurmountable that the Housing Element must be thoroughly reconsidered.

We will not win this battle for our communities by attempting to comply. We ask that you stand up to Sacramento and fight like our lives depend on it.

Thank you,

Terri Leker and Mark Wallace  
10 Bayhills Drive  
San Rafael, CA 94903



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stephen Nestel

### Community You Live In/Represent

Marinwood in Unincorporated Marin

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stephennestel@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

Overconcentration of housing in Marinwood/Lucas Valley will lead to massive negative impacts on our community- virtually doubling our population with subsidized, non profit housing who will contribute little taxes and fees for the necessary upgrades to infrastructure, water, schools and government services. It is a poorly conceived plan to fails to consider the impacts on the existing population. A good plan would include balanced growth, integrating subsidized housing with new market rate housing that will contribute tax resources to the community. We have the space for a large scale development at Silveira Ranch/ St Vincents. Why not build a "new town" instead of carving up our neighborhoods for the benefit of a few developers? The actually

economics of the housing element will have to play out over the coming years. No doubt, there is nearly unlimited demand for low cost housing. The real question is "How much will it cost the community and who will pay for it?" The housing element as proposed should be scrapped in favor of a "future friendly" version that balances the need for housing with our infrastructure requirements and tax revenue to support it. Otherwise, the housing element is doomed to be a fairy tale wish list of projects that lack the practical elements for success.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

arianne dar

### Community You Live In/Represent

Bolinas

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

adar@bolinaslandtrust.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Comment or Suggestion

It seems that some of the proposed sites in Bolinas have been removed. I know for a fact that the BCPUD is renovating their building and will be adding 5 units of affordable housing and I am still hopeful that the Tacherra Ranch will be able to house 30 households. If priority is being given to sites that have been identified on this plan, then these to sites should be included. I would also say that the Waterhouse Building which suffered a fire in 2019 could be renovated and 4 homes could be restored there.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Diane Henderson

### Community You Live In/Represent

Catholic Charities (St. Vincent's)

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

diane@dmhplanner.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-3

### Comment or Suggestion

The text states as follows:

"Large and Small Sites

St. Vincent's School for Boys. This site consists of three properties totaling over 315 acres of land."

In fact, St. Vincent's consists of eight properties (APN 155-011-02, -22, -24, -25, -28, -29, -30 and -32) totaling over 790 acres of land.



June 30, 2022

County of Marin  
Board of Supervisors  
Planning Commission  
Community Development Agency

#### **Board of Directors**

Bridger Mitchell, Ph.D.  
*President*

Ken Drexler, Esq.  
*Vice-President*

Terence Carroll  
*Treasurer*

Cynthia Lloyd, Ph.D.  
*Secretary*

Sarah Killingsworth, Esq.  
*Director*

Jerry Meral, Ph.D.  
*Director*

Mairi Pileggi, Ph.D.  
*Director*

Claire Seda  
*Director*

David Weinsoff, Esq.  
*Director*

David Wimpfheimer  
*Director*

#### **Staff and Consultants**

Morgan Patton  
*Executive Director*

Ashley Eagle-Gibbs, Esq.  
*Legal and Policy Director*

Leslie Adler-Ivanbrook  
*Program Director*

Jessica Reynolds Taylor  
*Development Director*

Patricia Wimpfheimer  
*Bookkeeper*

*Submitted via email: [housingelement@marincounty.org](mailto:housingelement@marincounty.org),  
[BOS@marincounty.org](mailto:BOS@marincounty.org), [planningcommission@marincounty.org](mailto:planningcommission@marincounty.org), and  
[DRodoni@marincounty.org](mailto:DRodoni@marincounty.org)*

#### **RE: Draft Housing & Safety Elements**

To Whom It May Concern:

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

Since EAC's founding, we have been committed to the health of West Marin's lands, estuaries, bays, and watersheds. In one of our earliest campaigns, we advocated for sustainable community planning to safeguard the irreplaceable natural environments from 1960s development plans that would have paved over the lands we know today as the Point Reyes National Seashore, Golden Gate National Recreation Area, Marin County Parks and Open Space, Marin Municipal Water District Watershed, Gary Giacomini Open Space, and more than 136,000 acres of productive agricultural lands.

These comments are focused on communities in the West Marin watersheds and proposed changes to the Countywide Plan (CWP) that would have long-term impacts to sustainable planning. We have organized this letter into three sections:

#### **1) Public Process and Countywide Plan (CWP) Integrity**

#### **2) General Questions and Inconsistencies in the Draft Housing Element**

#### **3) Requested Actions for the CDA to Incorporate into the Draft Housing & Safety Elements**

We look forward to providing more substantive comments in the coming months with the release of the Draft Environmental Impact Report (Draft EIR) that we understand will narrow site selection, allowing for more comprehensive comments on both the Housing and Safety Elements.



## **Section 1: Public Process and Integrity of the Countywide Plan (CWP)**

### **1.1. Public Process Concerns.**

EAC has participated in the public processes for the Housing and Safety Element since January 2022. While we are grateful to the Community Development Agency (CDA) for the availability of online meetings and remote access to staff for questions, the planning process has been less than ideal, and in our opinion is one of the main reasons that the Draft Housing Element proposes precedent-setting rollbacks to the County's environmental corridors and conservation zoning. This could have been avoided with ground-up community planning.

Due to the pandemic, the CDA engaged in a series of online meetings and developed online tools to encourage public input. While online meetings do increase accessibility for some, these meetings are not collaborative and exclude individuals who do not have access to the internet<sup>1</sup> or the skills to understand how to comment or communicate through the complex portals. Ultimately, the online meeting process constrains public engagement and collaboration, reducing the planning session to online PowerPoint presentations for community members who have access to the internet and a home computer. It becomes an experience of being talked at rather than participating in a dialogue.

The online forums prevent actual collaboration, dialogue, and input that is fostered through in-person community-by-community meetings. In addition, the online forum prevents public employees, and appointed and elected officials from engaging with and being accountable to a local community while making decisions that propose to dramatically change the development of that community.

### **1.2. Online Mapping Tools and Relationship to the Countywide Plan (CWP).**

The CDA released an extensive series of online mapping tools to gather broad community feedback to identify parcels appropriate for potential development. As the Draft Housing Element report indicates, hundreds of people participated in the use of the tools to make suggestions and recommendations of sites for consideration<sup>2</sup>. The multiple versions of maps and lists of potential sites was an overwhelming amount of information that kept changing from week-to-week, making it difficult to understand what was being proposed.

EAC's review of the Draft Inventory Sites<sup>3</sup> and the Balancing Act Tool established that the information collected was not informed by the CWP nor were these documents easily

---

<sup>1</sup> June 14, 2022 Draft Housing Element Workshop, community members from the San Geronimo Valley were unable to participate due to a power outage.

<sup>2</sup> This data collection was limited to English speaking individuals with computers, internet access, and with the technology skills to navigate the online tools. While some efforts have been made to offer information in Spanish, this effort has not been comprehensive.

<sup>3</sup> County of Marin Draft Inventory Site List Google Map available at:

<https://www.google.com/maps/d/u/0/viewer?mid=1fpxZN5FM9A7ZBYyc1FyYZNkqItN056&ll=38.05956845131791%2C-122.67626699999998&z=10>

accessible in the distribution of materials intended to inform and guide participating members of the public in the process.

In other words, the tools designed to gather public input were not designed or grounded in the CWP's policies or framework that is the supreme document to guide future physical development of a community. All decisions on future development should flow from the CWP, the supreme document to guide future physical development of a community, as is supported by 40 years of case law.

Instead, the CDA is proposing changes to the CWP to meet the Regional Housing Needs Allocation (RHNA). This subverts the strategic land-use intentions of the CWP. While we understand the need to identify additional sites to create a planning buffer—as parcels will be removed after the Draft EIR is released—the process is akin to a kitchen sink approach.

### 1.3. The Case for Ground-Up Community Engagement.

In-person and coordinated local community engagement should not be disregarded. We found two examples within the Draft Housing Element where community stakeholders helped to inform and find solutions that meet specific community needs when compared to the January 2022 inventory of sites.

- **San Geronimo Valley:** The County's top-down planning approach identified 90 potential housing units in the Tamalpais School District parcel and former Golf Course parcel that is currently owned by the Trust for Public Land. In the local Community Plan, the CWP, and Plan Bay Area 2050 these locations are inappropriate and infeasible for development. Thanks to local community engagement, the inappropriate site selections were removed and replaced with alternate locations that have potential to provide housing and serve the needs of the community that lacks affordable housing options and that will complement the villages of the San Geronimo Valley.
- **Community of Bolinas:** The top-down planning approach incorrectly identified the public park and local businesses as appropriate areas for future development. Following the release of the maps, the local community stakeholders and the Bolinas Community Land Trust worked with the CDA to identify parcels that were planned for affordable housing and to identify other potential sites to serve the needs of the community, also lacking in affordable housing options, that are in alignment with the current community culture and infrastructure.

In both examples, community groups found out about site selection *after it was released* to the public and had to work backwards, investing rushed time and effort to provide information to community members and provide input to the CDA for better site selection. In

the end, the site selections seem to be balanced in the community planning, pending the release of the Draft EIR.

Unfortunately, the same type of community coordination has not occurred in other communities in unincorporated Marin County. At the June 14th Public Workshop, coastal community members expressed that they did not have the opportunity to fully review plans, coordinate community response, or provide education to the community on what is happening. This is a major shift in the way that the County of Marin engages with their community members around development planning.

The County of Marin has a storied history of responsive community planning to plan for development proactively and sustainably. As mentioned in the introduction of our letter, the 1970s community planning safeguarded the irreplaceable habitats and natural resources that sustain our human and natural environment. The last update to the CWP in 2007 served as another example of collaborative community engagement and development that resulted in an award-winning CWP that would help protect sensitive coastal habitats; ensure resource availability; reduce greenhouse gas impacts; encourage infill and redevelopment projects focused on underutilized development near transit and job centers.

Under pressure of the RHNA timeline, the CDA has moved away from bottom-up community collaboration and relied on top-down consultant-informed planning that undermines the goals of our CWP, disregards the time and effort of the public participating in the comprehensive CWP updates of the past, and reduces public confidence in community engagement and outreach.

## **Section 2: General Questions and Inconsistencies in the Draft Housing Element**

Below we have outlined questions and inconsistencies within the Draft Housing Element that we would like to have addressed in the public process. We have also included suggestions to increase public understanding and transparency.

### **2.1. Guiding Principles of Housing Element Update.**

Why is the Housing Element update applying only three of the twelve CWP Guiding Principles to this update? The CWP is the supreme document that guides future physical development of the community. All Guiding Principles of the CWP should apply in housing site selection to ensure appropriate site selection that is informed by this overarching framework.

### **2.2. Land Use Element Update.**

Due to the non-standard organization and layout of the Marin's CWP, it is unclear what modifications are being made to the Land Use Element. Where can the public easily find a list of the Land Use Element policies that are being updated? How does the County cross reference for internal consistency between elements? How is this information being provided to the public to ensure that subordinate land-use actions comply with the CWP at the time they are being passed and implemented?

### **2.3. Table H-2.5: Population by Unincorporated County Community.**

The total population of the communities based on the figures provided in *Table H-2.5 Population by Unincorporated County Community* does not equal 68,902 as the total line indicates. The total is 47,396 with a variance of 21,506 people. Why is there a variance in these totals? What is the correct number?

### **2.4. Population by Unincorporated County Community + Housing Element Projected Population Increase.**

It would be helpful for the report to integrate or include a table that demonstrates the potential population increase if the Draft Housing Element was implemented. This provides important information for the public to cross-examine against the projected population increases in Marin County over the next 8 years.

### **2.5. Table H-2.21: Vacant Units by Type.**

The paragraphs of text preceding and describing *Table H-2.21 Vacant Units by Type* highlight some specific community vacancy rates and the high percentages of second homes or vacation units in coastal Marin County. Unfortunately, this table is organized by type of vacancy and not by community like the other tables in the Draft Housing Element.

We would like to see a table of vacancy rates that includes the community level information to better understand which communities are impacted more heavily by seasonal, recreational, or occasional use. This is an important aspect of the housing challenges in coastal Marin County as vacation rentals, second homes, and investment properties remove critical residential housing stock.

### **2.6. Inclusion of “Other Vacant” Sites (Abandoned or Red-Tagged).**

Has the County reviewed specific parcels in areas of coastal Marin villages that are categorized as “other vacant” that are abandoned or red-tagged to be included as potential development sites in the Draft Housing Element Update? Abandoned or red-tagged<sup>4</sup> housing units not in current use as residential housing stock could be identified for redevelopment or subdivision.

### **2.7. Availability of Water Table H-3.2: Water Capacity for New Development.**

We are unable to find reference to the Buck Center Inventory Site that proposes 249 housing units on this table. Where would the water supply for this site come from? Is there capacity to serve the proposed units within the existing water district?

---

<sup>4</sup> Eligible, red-tagged units that are eligible to be brought up to current code and safety standards

## **2.8. Wastewater Infrastructure Capacity and Sensitive Environmental Habitat Areas.**

It would be helpful for the County to overlay a heat map based on number of units proposed in the Site Inventory List over a GIS map of environmental resources including shorelines, sea-level rise projections, emergent groundwater projections, wetlands, creeks, the stream conservation planning area, water capacity based on *Table H-3.2 Water Capacity for New Development by Water District or Private Well*, and *Table H-3.5 Wastewater Treatment Capacity*. Without this information or the pending Draft EIR, it is difficult to comment on the feasibility of potential sites based on the ability to be able to support the potential development.

## **2.9. Table H-3.11: Coastal Zone Development (1982-2022).**

This table seems to be incomplete. Only two cells are updated for *Units Constructed* for the years 1988-2002 and 2002-2010, and the rest of the table is blank.

## **2.10. Implementing Programs Contradictions.**

Throughout the Draft Housing Element there are numerous references to the 2007 CWP land-use policies that are focused on promotion of compact neighborhoods, encouraging infill development, and promoting cluster development.

In unincorporated areas of Marin County, there are proposed Inventory Sites that do not meet this definition. For example, locations in Inverness on Balmoral Road do not meet these criteria; and the site selection seems arbitrarily based on allocating potential housing units to each coastal village rather than reviewing the layout of the communities and proposed locations to proximity of services, transportation, and the village core.

Locations like the Buck Center are located outside of the City-Center Corridor and would require a precedent-setting change to the CWP to modify the environmental planning corridors and rezone A-60 agricultural conservation zoning, promoting urban sprawl.

These examples highlight a fundamental contradiction with the CWP as the Housing Element strays from the CWP policies and guidelines.

## **2.11. By-Right Development and Loss of Local Control.**

The requirement in this RHNA cycle that sites that are not developed in 8 years may thereafter be subject to by-right development creates a host of unintended and unknown consequences for the County and communities to cope with in the coming years.

The large number of potential locations being identified in this RHNA allocation creates an environment in which developers may side-step local community planning. It benefits developers to delay developing housing units on the identified parcels, instead waiting

until the 9th year to submit applications, benefitting from a streamlined permitting process, which in some cases, may not require a project specific CEQA analysis.

This potential for thousands of streamlined development projects needs to be analyzed to ensure that all potential development locations are not sited near sensitive environmental resources and that the community infrastructure and resources are able to support the development projects.

## **2.12. Analysis on Upzoning and Potential to Exacerbate Displacement, Gentrification, and Fragmentation.**

We are not aware of comprehensive analysis by the County of potential consequences or outcomes of upzoning and the increased housing supply on disadvantaged communities. It has been reported that upzoning without promotion and support of affordable housing within communities has the potential to create additional displacement, gentrification, or greater social and economic fragmentation<sup>5</sup>.

The County needs to examine and unravel its history of exclusionary zoning practices and promote locally planned housing development to address the housing crisis in our communities. However, this type of planning must be accompanied by additional sets of policies to ensure the increased housing supply and density does not displace, gentrify, or further fragment communities.

In addition, the County needs to ensure any new housing stock is not converted to short-term rentals, investment properties, or vacation homes that harms the residential community. Otherwise, we are only exacerbating housing problems, promoting urban sprawl, diminishing future potential development locations, and placing pressure on our finite natural resources without achieving the intended goals to provide residential housing within our communities.

## **2.13. General By-Right and Coastal Zone Development Questions.**

During public workshops, County staff and consultants stated that by-right or ministerial permitting will take place under the RHNA allocations if the locations are not developed in 8 years. However, it has also been stated that this will not apply in the Coastal Zone.

Can you please provide the authority for the Coastal Act savings clause or other reference in the regulations?

Will any rezoning need to take place in the Coastal Zone? If so, a Local Coastal Planning amendment will need to occur, and coastal resource impacts should be closely reviewed and coordinated with the California Coastal Commission staff.

---

<sup>5</sup> Brookings, Double Edged-Sword of Upzoning. July 15, 2021. Available [www.brookings.edu/blog/how-we-rise/2021/07/15/the-double-edged-sword-of-upzoning](http://www.brookings.edu/blog/how-we-rise/2021/07/15/the-double-edged-sword-of-upzoning)

In areas that are subject to by-right development in the future, will potential development projects be required to prove access to freshwater and wastewater treatment ability?

#### **2.14. Potential Site Inventory: Priority Development Areas and Impacts to Infrastructure and Resources.**

Some of the Potential Site Inventory locations in unincorporated Marin County are not located in Priority Development Areas<sup>6</sup> and fail to meet the criteria for sustainable development. Development in these locations would promote urban sprawl and increase greenhouse gas emissions<sup>7</sup>, both conflict with the goals of Marin's CWP.

How is the County reconciling the distribution of potential housing locations in rural areas lacking adequate infrastructure (roads, wastewater treatment, access to water, public transportation, and job centers) that would increase populations and negative impacts on these limited resources?

#### **2.15. Best Available Science and Data to Inform Planning.**

Is the County able to integrate the most up to date science and data into the Draft EIS and the Draft Housing and Safety Elements? Specifically, the County's Climate Vulnerability Reports are now out of date as new science and data has been released regarding the potential severity of rising sea levels and new mapping systems that integrate the impacts of emergent groundwater. Rising sea levels and emergent groundwater predictions should require any potential sites within 100 feet of a shoreline or wetland be removed. In low-lying areas within floodplains, the setback should be much greater.

### **3. Requested Actions to Incorporate into the Draft Housing & Safety Elements**

It is difficult to comment on the potential site list in the Draft Housing Element and Draft Safety Element without the Draft EIR that ultimately will narrow the list of sites. However, we have made some recommendations below:

#### **3.1. Marin's award-winning Countywide Plan must be honored, not rolled back. Do not change our environmental corridor boundaries.**

In 2007, Community members volunteered their time and worked with the Community Development Agency to help update the CWP with a theme of "sustainable communities" creating a plan that would reduce negative impacts on the environment

---

<sup>6</sup> Association of Bay Area Governments, Priority Development Areas. Available at: <https://abag.ca.gov/our-work/land-use/pda-priority-development-areas>

<sup>7</sup> Priority Development Areas are defined as: 1) Infill to be in existing urban areas that are not to extend beyond urban growth boundaries and that are not Priority Conservation Areas. 2) must have a completed plan for significant job and population growth. 3) Either A) Transit-Rich, at least 50% of the area is within a 1/2 mile of ferry, rail, or bus service that runs every 15 minutes, or b) Connected Community, entire area within 1/2 mile of bus stop with peak service of 30 minutes or less or 1/2 mile of high quality transit and must be in an area identified by the California Department of Housing and Community Development as High Resource or has in place two policies to reduce Vehicle Miles Traveled (bicycle and pedestrian planning projects).

through strategic land-use planning that encourages development to infill sites near transportation corridors and discourages development in hazardous areas subject to wildfires, flooding, and sea level rise. It does not make any sense that the County is planning to change the environmental corridors that contradict the guidelines of the CWP and would initiate urban sprawl development.

### **3.2. Do Not Rezone A-60 Parcels or Modify Environmental Corridors.**

Agricultural conservation zoning should not be changed to pave the way for developers to build housing over the next 8 years. A-60 zoning has protected the Inland Rural Corridor from urban sprawl development since 1973. The County should make decisions based on sustainable development and incorporate the long-term consequences of changing the CWP Corridors and roll-backs to A-60 zoning before making these precedent-setting changes. The Buck Center site and other proposed A-60 sites should be excluded from the list.

### **3.3. Protect Sensitive Habitat Areas and Depleted Water Resources from Irresponsible Development Locations.**

New potential development sites should be at least 100 feet away from shorelines, creeks, and wetlands to protect habitat, water quality, and potential development from rising sea levels and emergent groundwater.

Locations within mapped floodplains, within 100 feet of riparian corridors, wetlands, or shorelines should be removed from consideration to protect critical and sensitive environmental habitat areas.

Sites located within critical watersheds that provide habitat for endangered and threatened species should be removed from consideration.

The County's Inventory Site List continues to include inappropriate locations for development that are too close to creeks, wetlands, and shorelines and agricultural lands that would expand suburban sprawl outside of urban growth boundaries. This conflicts with climate change vulnerability planning and studies the County has been working on for years and will only exacerbate problems in the coming decades.

### **3.4. Proposed housing should be in areas with adequate water and wastewater infrastructure to reduce environmental harms and avoid exacerbating lack of water availability due to extreme drought conditions.**

The rural villages of West Marin are without any centralized wastewater treatment systems, and any new development that would be susceptible to flooding should not be developed. Our communities will only set the stage for increasing bacterial loads in our freshwaters systems and beaches that are threats to public and environmental health.



In addition, freshwater is provided to communities through a network of water districts or private wells. In some communities, the viability of household wells is unstable. Specifically, in Nicasio, household wells run dry each summer. The smaller water districts in the rural coastal communities are extremely vulnerable to drought conditions, as demonstrated in the 2021 Water Year where some communities were on the brink of water rationing.

### **3.5. Avoid Environmental Hazards and Focus on Urban Area Infill.**

It is essential to apply current environmental hazards planning to remove locations susceptible to environmental hazards including wildfire, flooding, and sea level rise.

Locations proposed in high wildfire risk areas should be reconsidered, and the County should focus on infill near community services and transportation corridors. Infill will provide access to public transportation and services and align with the Sustainable Communities Strategy Growth Geographies as Priority Development Areas.<sup>8</sup> Adding thousands of housing units to rural areas will increase the number of Vehicle Miles Traveled (VMT), undermining Marin and California's greenhouse gas emission reduction goals.

### **3.6. Protect Residential Communities with Complementary Programs and Policies.**

Housing should be prioritized for people that live and work in our communities on a full-time basis. We can't simply build our way out of this crisis. Without ensuring safeguards that proposed development will serve the residential and workforce communities, we may exacerbate our existing affordable housing crisis. The County needs to find ways to further restrict short-term rentals, tax investment housing that does not serve as a primary residence (e.g., vacancy tax that reduces investment property incentives), and explore other solutions to preserve our communities.

### **3.7. Honor the Sustainable Communities Strategies of Plan Bay Area 2050.**

The County should promote infill near commercial cores, job centers, and transit centers, as well as promoting mixed-use commercial spaces. The Bay Area Association of Governments released the Plan Bay Area 2050<sup>9</sup> strategy that identifies Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs). The Draft Housing Element refers to the County obtaining funding by developing PDAs, but fails to honor the protections intended by PCAs. The full potential site list of 6,500 locations includes parcels in areas of PCAs.

---

<sup>8</sup> The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments, Plan 2050, Chapter 1. Growth Geographies. Available at: <https://www.planbayarea.org/2050-plan/final-plan-bay-area-2050/chapter-1-introduction-and-growth-geographies>

<sup>9</sup> Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area 2050. Available at: <https://www.planbayarea.org/>

**3.8. Any significant amendments to the CWP environmental corridors or conservation zoning must take place as a transparent and comprehensive public process.**

We recommend the CDA conduct an update to the CWP in the coming years that will fully engage local community members to update Community Plans and to prioritize engagement with the unincorporated villages to ensure consistency throughout planning and housing element documents.

**3.9. We request the Planning Commission and Board of Supervisors uphold the current CWP and not approve any updates that are not specifically required by the State of California<sup>10</sup>.**

The County should not make precedent-setting changes to expand the City-Center Corridor and should remove all A-60 agricultural zoning parcels from site selection and rezoning plans.

Thank you for the consideration of our comments. We look forward to further engagement on the Housing and Safety Element update process in the coming months and the release of the Draft EIR.

Respectfully,



Morgan Patton, Executive Director  
Environmental Action Committee of West Marin



Bridger Mitchell, Board President  
Environmental Action Committee of West Marin

---

<sup>10</sup> There is no legal requirement for the County to change the CWP environmental corridors and or A-60 zoning. The proposed changes seem to be based on the RHNA and the CDA's scramble for site selection to meet the allocation. If the Buck Center (and any other A-60 parcels remaining on the list) are removed from consideration, this will eliminate the need to amend the Countywide Plan environmental corridors, any needs to change A-60 zoning, and respect the will of the residents of Novato who voted to create an urban growth boundary.



## **Santa Venetia Neighborhood Association**

---

P.O. Box 4047 · San Rafael · CA · 94913-4047

June 30, 2022

County of Marin, Community Development Agency, Planning Division  
3501 Civic Center Drive, Suite 308  
San Rafael, CA 94903-4157

Attention: County Staff: [housingelement@marincounty.org](mailto:housingelement@marincounty.org)

Attention: County Staff: [safetyelement@marincounty.org](mailto:safetyelement@marincounty.org)

Re: Marin County Housing and Safety Elements Update, 2023 – 2031

We have received multiple notifications that June 30, 2022 is the last day to submit comments for the Draft Housing Element and the Draft Safety Element, and are resubmitting our previous comments to emphasize our grave safety concerns. We do not trust that the Housing Element numbers can be met without putting a great number of people, including new residents, at risk.

We wish to add that Marin County has seen multiple fires over the past several days, thankfully in the absence of gusting wind, and July has not yet begun. As well, we would like to point out the safety and evacuation data from Streetlight Data, cited in the Marin Community Wildfire Protection Plan, which states that Santa Venetia is one of 675 U.S. communities with limited evacuation routes. <https://www.streetlightdata.com/limited-emergency-evacuation-routes-map>)

The Santa Venetia Neighborhood Association (SVNA) is an organization representing the interests of 1,700 – 1,800 households (4,474 residents per the 2019 census figures) who live in Santa Venetia. As an organization, we are dedicated to the enhancement and preservation of the character and quality of life of the Santa Venetia neighborhood. We do our best to represent our community and have an established reputation to be a voice for proper development. And in accordance with our mission statement, we, the Board Members of the SVNA, feel compelled to comment on this issue.

As we wrote to you on April 11 and in previous letters, we want to ensure that the Marin County Board of Supervisors receives an accurate impression from our community regarding the updated Housing Element and understands our grave collective concerns about the magnitude of development proposed. All of the issues described in those letters — highly constricted road access that impedes emergency ingress/egress, our history of landslides and flooding, and the risk of catastrophic fire danger (particularly to

**SVNA@santavenetia.org ~ www.thesvna.org**

# **Santa Venetia Neighborhood Association**

Page 2 of 4

June 30, 2022

homes sited in the WUI) — are well-known to the Marin County BOS. Before rushing to build, we deserve answers about these areas of concern, perhaps none more important than how water will be supplied.

Community outreach has left much to be desired, and in our attempts to reach out to neighbors we have found that, by and large, they are unaware of the degree to which the updated Housing Element will adversely change our neighborhood and greater Marin. Many neighbors are under the impression that the housing mandates were originated by County staff rather than State officials. Also, since most do not have the time to wade through more than 300 pages of dense and complicated documents, we assure you that the number of comments you receive regarding the updated Housing and Safety Elements do not reflect the attitude of the Santa Venetia community.

As has been frequently stated in previous workshops, community members were unaware that the process was even underway until they were alerted by word of mouth (including a hand-made sign on a telephone pole). As for the workshops themselves, we do not believe that they represent a true and transparent dialogue between community partners. This is due in part to the severe limitation on comments, and the fact that the virtual workshops are held in “webinar” mode. As a result, only County staff know the number of attendees, which is critical in gauging community awareness. Also, speakers representing the County, or, by extension, MIG, have not been clearly identified by name and title on the Zoom screen.

The June 2022 Draft Safety Element and Draft Housing Element appear to conflict with one another, and it is unclear how, or if, that conflict will be resolved. Key findings of the “Preparation of the Housing Element Update” clearly state the limitations on infrastructure:

- Limited infrastructure capacity to support more housing development.
- Insufficient clean water and septic infrastructure.
- Insufficient evacuation capacity and ingress/egress for emergency vehicles.
- Insufficient infrastructure for pedestrians and bicyclists.

In response to these comments, this Housing Element introduces programs to expand and preserve the County’s affordable housing inventory, to create a diverse range of housing choices, and to mitigate infrastructure constraints. (p. 4 DHE)

These limitations are not actually addressed in the Safety Element— they are merely mentioned as areas requiring further study. SB 9 and other recent legislation driving the Housing Element fail to plan for multiple proven risks such as wildfire, flooding, and landslides. (we assume due largely to their insolubility). We strongly agree with Supervisor Connolly’s statement in a recent IJ article that, “SB 9 is a flawed law in the sense that things like high-fire-risk zones and other hazards are not adequately accounted for.”

The maps used in the Safety Element demonstrate the great risk to Santa Venetia from liquefaction, seismic shaking amplification, historic flooding and sea level rise, and fire.

# **Santa Venetia Neighborhood Association**

Page 3 of 4

June 30, 2022

Any one of these risk factors will severely impact emergency evacuation on North San Pedro Road, the sole route in and out of Santa Venetia.

For example:

Map 2-9, (Seismic Shaking Amplification Hazards) shows that parts of Santa Venetia are on or adjacent to "Soil Type E (200 m/sec > Vs). The strongest amplification of shaking is expected for this soil type. Soil type E includes water-saturated mud and artificial fill."

Map 2-11 (Liquefaction Susceptibility Hazards) shows that our neighborhood is directly adjacent to areas of "very high" level of liquification susceptibility.

Map 2-12 (Landslide Hazards) does not accurately portray the landslide risk on Crestview, Sunny Oaks, Bayhills Drive and surrounding streets.

We are concerned by the language regarding flooding, which reads: "Development in flood hazard areas in the County is not restricted, but rather municipal code requirements and other regulations consider existing and projected flood zones and extents when reviewing the design and adaptation measures of proposed development." (p. 9)

Map 2-13 (Flood Hazard Areas) directly follows, which demonstrates the severe flooding risk our community faces. This risk is exacerbated by our inadequate and aging levies.

We noted with interest the section on wildfire:

Fire hazard severity zones (FHSZ) are CAL FIRE-designated areas of significant fire hazard that influence how people construct buildings and protect property to reduce risk associated with wildland fires. A CAL FIRE countywide assessment of wildland fire threat revealed that approximately 82 percent of the total land area of the County is ranked as having moderate to very high fire hazard severity zone ratings. (p. 11)

We ask the date on which the countywide assessment was conducted, and where it has been made publicly available.

Map 2-15 (Fire Hazard Severity Zones) is dated August 15, 2021 but cites CALFIRE 2007 as its source. We ask that you clarify this discrepancy.

Map 2-19 (Sea Level Rise) projects near-term (2040-2050) sea level rise of - 50 cm (1.6 ft) in Santa Venetia, which is the highest risk category.

The Disaster Preparedness, Response, and Recovery section states:

The MWPA is conducting an Evacuation Ingress-Egress Risk Assessment to create a rating system of roads, presenting a visual risk assessment of the County's roadways at various levels of aggregation (geographic areas, evacuation zones, or other). In addition to the software platform, a report will also present an initial list of risk factors for improvement by area, by risk category, and by responsible agency. (p. 20)

# **Santa Venetia Neighborhood Association**

Page 4 of 4

June 30, 2022

We see that this assessment is in progress; we ask that it reflect Santa Venetia's undeniable status as one of Marin County's most vulnerable areas. We urge you not to exploit our neighborhood for development and exacerbate existing risks

Figure 2-24 Goal EHS-5. Safety from Wildfire, Program Implementation Table states that funding for fire evacuation safety "may require grant funding or additional revenue." (p. 56). We ask where such funding is available.

As we stated in previous letters regarding the updated housing sites list, not only do we object to the placement, density, and extraordinarily high number of selected sites, we reject the process under which the State and, by extension, the County are operating. With the Safety Element still in progress, and no consensus on critical infrastructure improvements, it is premature to move forward with site identification. We must also acknowledge the cumulative impact of such massive development. For example, we need to analyze the repercussions to Santa Venetia (before adding a single new unit) from the upcoming Northgate development, which will add nearly 1,500 units. We question the purpose of updating the Housing Element to remove organizations that currently provide needed services to our community and beyond, such as Old Gallinas School.

To quote from the County's July 9, 2021 appeal, unincorporated Marin County (lacks) "Availability of land suitable for urban development or for conversion to residential use." That this and nearly every other statewide appeal was denied proves that the entire process needs further evaluation before continuing. We urge you to take a pause from this rushed process to consider — truly consider — these impacts.

Please consider the safety of your constituents, rather than complying with state laws that put us at even greater risk of fire, flooding, and landslides.

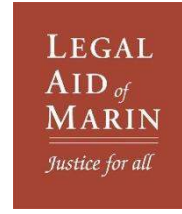
This push for development is couched as filling a need for "affordable" housing, but in reality, only a minority of the new building will serve truly low-income residents. The majority of housing will be at market rate, and the building process will override local control, limit public input and community planning, and in some cases remove any environmental oversight.

As we did in our letter of April 11, and past letters, we will close by paraphrasing one of our SVNA members, who stated: "The County's first responsibility is for the health and safety of the existing residents of our neighborhood." We again ask you to consider this as you move forward.

These are just a few of the concerns that we have. The SVNA has encouraged our members to send comment letters as well, citing their concerns about this update. Please include those concerns as concerns of the SVNA.

Thank you, SVNA Board of Directors

cc: Damon Connolly, District 1 Supervisor



June 30, 2022

Planning Commission  
MIG, Inc.

Dear General Plan Updating Team:

Thank you for the opportunity to comment on the draft Housing Element (“Draft”). We appreciate all the work that has gone into producing this document, and we offer our comments for incorporation into the final document that moves the County in the direction of significant progress to achieve housing justice and meet our current and future housing needs. We stand as partners committed to this goal.

We represent a broad coalition of Marin social service, legal aid, tenants’ rights, affordable housing, fair housing, community economic development, and social justice organizations working alongside or on behalf of thousands of Marin residents, especially low-income, Latino, Black, Indigenous, and People of Color (BIPOC), and other classes of residents protected under fair housing law who are disproportionately impacted by the current housing crisis.

At the outset, we urge the County’s planners and consultants to strengthen specificity throughout the plan to ensure it is clear, aligned, and actionable. State law requires all Housing Element programs to have beneficial impact within the planning period, including identification of specific actions, which agency or official is responsible for those actions, and a timeline.<sup>1</sup> Programs to affirmatively further fair housing must identify clear “metrics and milestones for determining what fair housing results will be achieved.”<sup>2</sup> Furthermore, a recent survey of HCD reviews of draft housing actions from Southern California jurisdictions emphasizes that time bound actions with “specific commitments [from local actors], metrics, and milestones” are required.<sup>3</sup> Though the County’s Housing Element currently has an AFFH action matrix with labels “specific commitments,” “timelines,” etc., in many places – and specifically as outlined below, – there is not the detail or specificity needed to make these commitments meaningful.

### **Prioritize Specific Policies and Programs to Protect Tenants**

“Program 31: Tenant Protection Strategies,” as currently drafted, is both insufficient to meet the needs of low-income community members, people of color, and protected classes at risk of

---

<sup>1</sup> Gov. Code § 65583(c).

<sup>2</sup> Gov. Code § 65583(c)(10)(A)(iv).

<sup>3</sup> ABAG, [Affirmatively Furthering Fair Housing \(AFFH\) Policy Tips Memo Learning from Southern California & Sacramento: Early Experiences in Complying with AB686](#).

displacement and inadequate to meet state statutory requirements.<sup>4</sup> The Draft's list of 7 tenant protections and anti-displacement policies and the inclusion of a Tenant Bill of Rights is commendable, but we must comment on the lack of specificity, clarity, and a failure to commit to strong policies that address the established goals of the Housing Element process - to address historical inequities, segregation, and vulnerability of Marin's low-income renters.

### Rent Stabilization

Program 31 first suggests rent stabilization as a strategy the County "may" want to explore because of Costa Hawkins exemption of single family homes and developments built within the previous 15 years. This neglects the reality - that under the protections of AB 1482, allowable rent increases are currently 8.1% and will change to 10% in August of 2022 based on the increasing CPI. While noting the gaps in protections from Costa Hawkins - certainly a relic that must be addressed - Marin's authority to address it at the local level is highly questionable, as the Draft references, stressing that complying with Costa Hawkins "is critical."<sup>5</sup> Further limiting the rent increase caps enacted by the state is crucial to address the displacement of Marin's low-income renters. The vague suggestion to consider rent stabilization, and a 'why' that misses the point, is not a specific commitment to take action that will have any real-world impact. Furthermore, while other jurisdictions in the County (most notably Fairfax) are considering rent stabilization, it is imperative that the County lead this movement and provide the administrative infrastructure to make rent stabilization ordinances effective throughout the County.

### Just Cause

The Draft also recognizes the need to expand the County's just cause ordinance, however it continues to erroneously rely solely on addressing the exemptions enacted by Costa Hawkins. The Draft also fails to note the leading cause of evictions and displacement, which are the no-fault just causes - substantial remodels, owner move-ins, and withdrawal from the rental market. These no-fault just causes are often used, and abused, by owners to remove tenants so that rents can be increased to market rate, further eroding affordable housing stock. Strengthening no-fault just causes for evictions through higher relocation payments, longer eviction notice periods, and a right for a tenant to return **at the same rent at the time of displacement**, apart from lawful, annual rent increases are critical to a general plan that complies with state law and addressing the displacement of Marin's BIPOC and senior renters. Moreover, this displacement is happening now, thus the Draft should commit to strengthening Marin's just cause ordinance by the end of 2022. An expanded just cause ordinance should include:

- Substantial repairs - Repairs for health and safety concerns only and permits obtained before notice to vacate served; tenant has right to return under same terms/rent, subject to allowable rent increases
- Withdrawal from the rental market - Clarify that a sale of the property is not "withdrawal" and is not a just cause for eviction; owner is required to file notice with the city/county; longer notice period and right to return for displaced tenants

---

<sup>4</sup> [County of Marin Housing Element Update, Draft for Community Review](#), June 2022, p. 28-29.

<sup>5</sup> *Id.* at 28.



- Right to Return if owner/owner's family move out of the unit within 2 years, or if the owner/owner's family fail to move into the unit within 30 days of the tenant's removal.

### Tenant Bill of Rights

The undersigned were encouraged to see that the Tenant Bill of Rights ("TBR") made it into the Draft. However, as with the other listed anti-displacement policies, we urge more specificity and a concrete timeline (2023) for its passage. The purpose of a TBR is to state unequivocally that all Marin residents have the right to clean, safe, and secure housing, which includes but is not limited to:

- Clean, safe housing - stronger protections for tenants from eviction if they deduct repairs from rent
- Rental registry - Marin's current registry has no real penalties for failure to register because courts, tenants, and advocates are unable to access it when facing an unlawful detainer. It is not enough to "continue to implement the County's Landlord Registry requirement," because the implementation is not currently happening.<sup>6</sup>
- Tenant Commission - Seats reserved that represent low-income seniors, persons with disabilities, federally subsidized housing including LIHTC, and communities of color that provides information, referrals, and advice to tenants and advises the Board of Supervisors on programs and policies affecting Marin tenants.
- Fair Chance Housing - The use of criminal history in obtaining housing should be eliminated, given the disparate impact on people of color, using Berkeley, Oakland, and Seattle as templates for such an ordinance.
- Nonpayment notices - Require landlords to provide a 7 day warning letter before a 3 day notice to pay or quit.
- Protections for subletting - Subletting not a just cause for eviction IF landlord unreasonably withheld consent following written request by tenant, so long as max number of occupants does not exceed allowable limits.
- Protections for families - Addition of family members not just cause for eviction, so long as the number of occupants does not exceed allowable limits.
- Anti-retaliation - Rebuttable presumption if tenant asserted rights, including but not limited to, requesting a reasonable accommodation, reporting sexual harassment, and otherwise filing complaints against housing provider staff within 6 months.

### Community or Tenant Right to Purchase ("COPA/TOPA")

Again, at risk of belaboring the requirements for specificity and concrete timeline for adoption, the Draft must do more than merely suggest anti-displacement strategies. As a key intervention against speculation, TOPA/COPA preserves currently affordable housing and generates new permanently affordable housing for future generations. TOPA/COPA expands stability and wealth-building opportunities for tenants by creating pathways to homeownership. A COPA/TOPA program requires a significant amount of planning and funding. Outlining those

---

<sup>6</sup> *Id.* at 29.

steps and preparations must start now with this Housing Element update in order to implement a program in 2024.

The Draft should specify the above proven policies and programs to improve and conserve existing, non-subsidized, affordable housing stock and address the unmet needs of low-income, protected class tenants in order to meet the obligations under Housing Element Law.<sup>7</sup> We urge the County to make concrete commitments in the Housing Element update to strengthen just cause laws by the end of 2022; pass a Tenant Bill of Rights by 2023; and pass TOPA/COPA and rent stabilization by 2024. These are key tenant protection and affordable housing strategies that require concrete objectives.

### **Fair Housing Housing Outreach and Enforcement Program Should Delineate Entity Performing Specific Tasks**

The Draft outlines specifically that it funds Fair Housing Advocates of Northern California (FHANC) to provide fair housing outreach and enforcement. FHANC provides fair housing counseling, education, and enforcement for Marin County residents. However, one of the actions listed is “Beginning in 2023, increase fair housing outreach to Homeowners Associations, realtors, property managers, and brokers, as well as individual property owners (such as single-unit homes, duplex/triplex units, and ADUs used as rentals). Specifically, promote the State’s Source of Income Protection bills (SB 329 and SB 222) that prohibit discrimination based on the use of public assistance for housing payments (such as Housing Choice Vouchers).” Particularly given the documented discriminatory policies and practices against housing choice voucher holders, this is an important part of affirmatively furthering fair housing in the County. However, it is not stated who will be conducting this work. Responsibility and accountability should therefore be clarified.

### **Comprehensive Review of Zoning and Planning Policies Should Occur Prior to 2025**

The Count acknowledges that its “Development Code and planning policies have been incrementally developed over time and may have inherited language rooted in segregation. The County will conduct a comprehensive review of its zoning and planning policies to remove discriminatory language or policies that may directly or indirectly perpetuate segregation. This includes reviewing the use of the terms ‘single-unit’ residential use, ‘protecting the character of the neighborhood,’ and findings of conditional approval in different regulatory documents.” The specific action and timeline suggests conducting a comprehensive review of zoning and planning policies to remove discriminatory language and policies, but not until 2025. Not only did the Othering & Belonging Institute identify Marin County as the most segregated in the Bay Area<sup>8</sup> (as identified above), Institute researchers found that roughly 80% of the Bay Area’s residential

---

<sup>7</sup> See Gov. Code § 65583(c)(4) (The Housing Element must contain a program that addresses the conservation of existing affordable housing stock in the community); *see also Buena Vista Garden Apartments Ass’n v. City of San Diego Planning Dept.*, 175 Cal. App. 3d 289, 294, 302-303 (1985) (holding that this requirement in Housing Element Law includes action programs that preserve all housing that is already affordable to lower- and moderate-income households, not just subsidized or rent controlled housing).

<sup>8</sup>[https://belonging.gis-cdn.net/us\\_segregation\\_map/?year=2020&bounds=38.48%2C-122.03%2C37.65%2C-123.40&geo=tract](https://belonging.gis-cdn.net/us_segregation_map/?year=2020&bounds=38.48%2C-122.03%2C37.65%2C-123.40&geo=tract)

property is zoned for single-family homes, a significant indicator for racial segregation. Neighborhoods restricted to single-family homes are more likely to be exclusively White than communities with a mix of apartments and homes. The state and numerous cities around the state have recently taken steps to scale back single-family zoning, and the County should do the same, prior to 2025.

### **Strengthen Connections of Programs to Policies and Goals**

We appreciate that programs can meet different policies and goals. But in the current version, there is no way for a reader to see which programs meet which policies. It is not the responsibility of citizens and organizations to sift through the programs to check that each policy is supported by a particular program.

- Programs could be labeled with each policy they support if there are more than one
- Hyperlinks could be used to indicate in the policy section which programs are related, and allow readers to see them
- A Table could be created to show them in a matrix, similar to the AFFH matrix
- AFFH actions should also be flagged in the body of the text alongside the requisite programs, rather than relegated to the end.
- The current sections for the Programs could use some revision - and ideally be reformed to be consistent with the Goals and Policies. For instance, the first section labeled ‘housing supply’ is really about land use regulation and entitlements. Most of the document is about housing supply.

### **Outline Specific Commitments to Actions**

The State has made it clear that AFFH guidelines and new HE law expect real action. Too often, the plan resorts to non-committal language like “consider” for key programs.

- See for instance the Community Opportunity to Purchase Act in Program 23.
- The County should make real commitments to design and implement programs to address housing needs in every policy and program area.
- It must make more direct commitment to housing finance, and to making housing finance more efficient by combining efforts from jurisdictions and regional agencies.

### **Detail the Collaboration and Leadership Role the County Will Play**

Policy 3.2 states that the County will take a proactive approach in local housing coordination. This fits with the Marin Civil Grand Jury report calling [for more collaboration](#), and our letter to the Board of Supervisors dated April 11, 2022.

Unfortunately, there are almost no commitments or ideas or plans for collaboration and coordination. The Draft Housing Element reads like the housing element from a jurisdiction whose only housing role is land use regulation. While the County has this role, it is also the single most important leadership institution in the County, providing resources and guidance and institutional capacity for all 12 jurisdictions, and acting as a key node connecting municipalities to regional, state, and federal institutions. One example of how the County might take a proactive and leadership role is enumerated above, related to passing a rent stabilization ordinance that would create structure for other jurisdictions to follow suit.

The plan needs to:

- Directly address the Grand Jury recommendations regarding building more institutional capacity, either through transforming the Marin General Services Agency or through another mechanism.
- More directly discuss other policy and coordinating activities that the county can lead with local jurisdictions.
- Address how the County will lead local jurisdiction in engagement with regional and state agencies, and particularly address cooperation with the new Bay Area Housing Finance Agency.

The plan should also elevate areas where the County is poised to lead, and flag specific interventions where collaboration is possible.

- **Rental Registry is poised** to be one of the most innovative and progressive in the State, and a model for statewide action. This should be its stated ambition.
- **The SB9 Tool** is something that the State and other jurisdictions (and some private companies) are already working on. Marin can achieve its goals more affordably and effectively by coordinating with other groups in this area.

### **Address Marin's Limited Development Capacity**

The plan admirably calls for needed housing development in the county, with important attention to housing at different income levels and for communities with different needs, as required by law. But it largely stays silent on how to achieve that - how to actually ensure that qualified organizations will finance and build housing. The County is not limited to land use regulation, and must become more creative in driving housing development, as the Grand Jury made clear.

Ideas for this could and should include:

- Creative ways to support small construction and development businesses in Marin, especially BIPOC & women-owned businesses and businesses based in the Canal and Marin City.
- Ways of increasing our construction workforce through growing existing training programs or building new ones
- Ways of growing the pool of finance discussed in Section 4, and better connecting the housing finance resources in Section 4 with the Programs in Section 5 (the two sections are only marginally connected).
- Ways of encouraging more philanthropic capital to collaborate in housing development and support services.
- Increase the capacity of the non-profit or low-profit development industry in the county to better meet the established and significant housing needs of particularly low-income and BIPOC residents, as well as other protected classes.

### **Set Ambitious Goals for Below Market Rate Homeownership**

The current Program 26 only calls for maintaining 90 BMR units, when the actual number of existing units is much higher. There is no ambition for significant growth in a vital area of

housing policy, especially in a county with massive wealth inequality and huge political and economic incentives to own.

Marin instead needs to:

- Set a loftier goal for BMR units.
- Implement a study of BMR models, including Habitat for Humanity, Community Land Trusts, Limited-equity Co-ops and more, as a way of considering a broader push for supportive and inclusive homeownership - connecting Program 27 to Program 26.
  - As part of the study, the County should examine opportunities for creative and supportive conversion of existing rental buildings into BMR homeownership opportunities
- It should connect sections in Program 23 and elsewhere calling for Community Opportunity to Purchase (COPA) - which should be revised to include the more common Tenant Opportunity to Purchase (TOPA) - as a BMR homeownership tool. COPA/TOPA should be pursued as a homeownership strategy, and not just a preservation strategy in the case of condo conversions.
- The County must examine barriers to multi-family homeownership opportunities (i.e. condos, townhouses, etc.) as a means of providing more ‘affordable by design’ opportunities for homeownership.

### **StrengthenConnections to Existing Programs and Previously Set Goals**

In our April letter, we urged the County to do a better job evaluating progress from the 2015-23 HE. What was produced is the standard practice of a matrix of evaluation with limited details in one section, and almost no reference to existing programs in Section 5. Section 5 needs to act more as a continuum, connecting what exists, what was done and not done, and what needs to be done in the future. Each section should flag the degree to which that program was included in the previous HE, and progress that was made, separating new ideas from continuing ideas, and clearly showing where the County made commitments and didn’t implement them as well as where the County made commitments and succeeded.

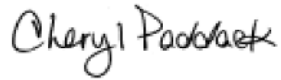
### **Conclusion**

Public Participation is not simply about soliciting community input, but incorporating that input into the Housing Element update. The current set of actions to address the needs of residents and the urgency of increasing affordable housing do not accomplish this. We urge the County to incorporate the community’s input, which is supported by available fair housing data and the documented experiences of residents and service providers.

Our nonprofit agencies share a commitment to housing justice and meeting the current and future housing needs across Marin County. There is a tremendous opportunity with this Housing Element to outline specific, aligned, and actionable plans that will have widespread impact for years and decades to come. The County must seize this opportunity and take the lead to outline and advance specific policies and practices if we as a community are to realize this goal. We

recognize the enormous amount of resources that the Housing Element requires and look forward to actively contributing in its completion, approval, and implementation.

Sincerely,



Cheryl Paddack  
Chief Executive Officer  
North Marin Community Services



Omar Carrera  
Chief Executive Officer  
Canal Alliance



Caroline Peattie  
Executive Director  
Fair Housing Advocates of Northern California



Chris Cabral  
Executive Director  
Legal Aid of Marin



Chandra Alexandre  
Chief Executive Officer  
Community Action Marin



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Elaine Fischman

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

lainiefisch@comcast.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Sacramento's "one size fits all" approach to mandated housing will not work in Marin. The housing plan put forward as an RHNA cycle and backed up by punitive state laws, is problematic and unworkable. The Housing Element includes many flaws that make its goals unattainable and will not result in HCD certification.

Marin is already overbuilt. Mill Valley's hilly, winding roads were not meant to accommodate the scale of development now being demanded.

We are in a severe drought. Sacramento should not leave the problem of where to find water up to the towns and cities of Marin. "Build it" and then "find your own water" is a ridiculously

unreasonable, unworkable demand.

Mill Valley's evacuation routes are extremely limited and will be gridlocked when residents attempt to flee during a wildfire, which would lead to loss of life (see, Oakland Hills Fire of 1991).

Marin is estimated to lose 13,000 jobs over the next 30 years. Public transit (Golden Gate Transit) has greatly decreased its routes and reduced the number of buses scheduled since the start of the Covid pandemic. Many of those bus routes are not coming back since many jobs that used to be filled by commuters working in San Francisco are now, and will continue to remain, filled by remote workers, working on computers from home.

HCD needs to adjust expectations in a world of climate-change-fueled year-round fire season and extreme drought, during a pandemic that has upended everything. Our population is currently shrinking, large companies are leaving the state, telecommuting has changed work habits, and so on. People are still not willing to use public transportation at pre-Covid levels.

The HCD's RHNA process (already found faulty and still under state audit) should be halted, even under threat of fines and receivership.

Marin would require costly infrastructure upgrades as part of new development. Will Sacramento pay for these upgrades, and allow Marin time to implement them, in the "beat the clock" punitive system being put in place by the State? We're in danger of totally losing local control of our environment and our small town way of life, only to be at the mercy of developers? This is a disaster for our beautiful Marin County. Please push back, join in the appeals, and help us protect Marin!





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Stacey Laumann

### Community You Live In/Represent

Point Reyes Station

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

stacey@clam-ptreyes.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 5: Housing Plan

### Comment or Suggestion

Program 4 - ADUs. Please add adoption of pre-approved plans for detached ADUs? 1 bedroom units, 2 bedrooms at 800 sqft and 3 bedrooms at 1200 sqft.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Sheila Meadr

### Community You Live In/Represent

Mill Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

sheila.g.meade@ail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

Hello,

I am very concerned about our state government attempting to trump local sensibilities with a one size fits all overbuilding mandate. I could go on about all the reasons a small town like Mill Valley should not be over developed but if you live here, you know why. The whole NIMBY argument falls flat. People are tired of cancel culture. Issues such as this are complex & local voices deserve to be heard & respected. The resistance against overbuilding is rooted in legitimate environmental & safety concerns.

As a popular state, CA will face housing shortages. But there are better ways to approach

these issues than just  
make California build, build, build.  
That is short sighted. Celebrate & respect our  
cities differences.

Thank you for your time & consideration.

Sheila



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Loretta Figueroa

### Community You Live In/Represent

Almonte

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

millvalleyfig@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Section 2: Needs Assessment

### Page Number

Marin Countywide Plan 23 - 2023/2031 Housing Element

### Comment or Suggestion

"As of 2019, there were 25,850 households in unincorporated Marin County, a decrease of 343 from the 2010 level of 26,193."

Is this decrease in households a reflection of an increase in short term rentals? Something else? How many "official" short term rentals are there in unincorporated Marin County? Airbnb says there are 570 "stays" in the Mill Valley, California, area. Some of these may be "untracked" guest suites or "styled sheds" and not the main dwelling.

Unfortunately, the main dwelling may also be a short term rental.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Kenneth Drisdell

### Community You Live In/Represent

Upper Lucas Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

k\_drisdell@hotmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-7, C18

### Comment or Suggestion

I offer these comments both as a homeowner and a member of our Lucas Valley community:

7 Mount Lassen is located immediately adjacent to the Miller Creek. This is currently an office complex which serves as a much needed resource in unincorporated Marin. To renovate an office complex to residential use, will violate your development regulations for sites adjacent to any waterway. Please provide a project based EIR, to be distributed to the local Lucas Valley Homeowner's Association for their review,

outlining its impact on the community.

1501 Lucas Valley Road is one large parcel of land overlooking the aforementioned LVHA. We collectively do not approve of any zoning changes to this land without a project based EIR and comments and input by the community. The owners of this property have been brazen enough to build structures without a planning review nor building permits. There is no record of permits filed for this property as of today in the Marin County Permit online records. As it is now, this owner can only build four separate units on this parcel of land, with proper approvals from local jurisdiction. If you allow, deviations from the rule of law and regulations, our Lucas Valley environ will be harmed, and legal action may ensue.

Rotary Field open space: Please be advised that the open space for this site has been approved to remain an open space resource for the community for many years. Again any development in this field shall have its own project based EIR to inform the nearby residents as to the impact it will have to build 80 units on this site, including traffic, bus access, infrastructure build-outs, and schools.

More importantly, a cumulative impact of 170+/- units on two intersections of Lucas Valley Road and Mount Lassen and Lucas Valley Road and Mount Muir Court needs to be addressed for traffic, wildfire evacuation, water and sewer needs, and numerous other factors that would impact the health and safety of residents living nearby.

Thank you.  
Ken Drisdell,  
Lucas Valley Homeowners Association, Board  
President.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Vikrum Nijjar

### Community You Live In/Represent

Strawberry

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

vsnijjar@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-19

### Comment or Suggestion

I'm in strong support of the only vacant site in Strawberry (70 N Knoll - 034-012-26, 034-061-09) to continue to be included in the upcoming Housing Element. The site is adjacent to existing multi-family housing which is built on the same slope, has plenty of traffic capacity on Thomas Dr, and as other parts of the Housing Element clearly indicate: utilities are not in deficit. The site is more than feasible for inclusion as a prime in-fill location. The community is in dire need of additional housing and this site is a perfect candidate.





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Francine Hentz

### Community You Live In/Represent

Tomales

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

dan\_fran@att.net

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

**Comment or Suggestion**

To Whom it May Concern.

Hello,

You may already have been informed of the water issues we're having here in Tomales, due to record low rainfall. As long term home and property owners, I wanted to make sure the facts be known, our tap water is coming out coffee colored, due to the extremely low water table, so resources are quite limited. Currently we are recycling our laundry and shower water to accommodate our landscaping, also we are filtering our drinking water for the first time ever.

Sincerely, Francine Hentz and Dan Erickson

**From:** [Ken](#)  
**To:** [BOS](#); [PlanningCommission](#); [housingelement](#)  
**Cc:** [Rodoni, Dennis](#)  
**Subject:** Draft Housing Element  
**Date:** Thursday, June 30, 2022 9:05:46 PM

---

Supervisors, Commissioners, Planners,

The Point Reyes Station Village Association is concerned that the method used to produce the Housing Element Sites Inventory has resulted in a flawed document that is not in the best interests of the citizens of the county, the residents of Point Reyes Station or our millions of visitors. The rubric for determining development potential based on lot size does not take into account the values and motivation of local residents. It reflects the common economic thinking of the commercial real estate/developer industry and does not allow for local solutions that involve creative community building. We recognize that historic opposition in some communities has resulted in exclusionary policies based on race and/or income. However, Point Reyes Station community members are a mix of low, moderate and above moderate income people who welcome neighbors of all economic classes and ethnicities, and we are confident that there is a process that will allow our village to expand in an appropriate manner without sacrificing its rural community character.

For us, rural "community character" is not code for exclusion, but rather a set of objective features, many specifically noted in the Point Reyes Station Community Plan, such as varied densities distributed throughout a large area; more open spaces between buildings; some large, but many more small, buildings; and significant space devoted to agricultural-related support functions, work vehicles and other mixed uses, spread throughout the town. Extensive impervious surfaces should be minimized and curbs and sidewalks discouraged in order to maintain the rural nature of the village.

These objective features of a rural community are in conflict with the results of the county's site selection which basically forces the same urban/suburban outcome on a rural, largely undeveloped area rather than using guidelines for site selection that are more appropriate to a rural environment. High density development that follows the urban/suburban approach will necessarily translate into negative impacts on rural infrastructure (and rural community character) than would be the case in urban and suburban Marin communities where new development can rely on the existing infrastructure. Roadways, parking, sidewalks, water supply and sewer systems as well as public transit make concentrating new density in the existing urban areas of Marin more cost effective, sensible and less impactful than would be the case if sited in a small village like Point Reyes Station.

Community character in coastal Marin, and Point Reyes Station particularly, is an agreed upon value recognized by the millions of people who visit here annually as well as by the California Coastal Commission. Adding 153 new residential units to the town will at best diminish and possibly destroy this existing value that benefits so many. We look forward to discussing a reduced and reasonable siting plan with you.

Thank you,  
Ken Levin, President  
Point Reyes Station Village Association



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Margaret Nau

### Community You Live In/Represent

Lucas Valley-Unincorporated Marin

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

margaretnau@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

Appendix C: Sites Inventory

### Page Number

C-18, C-14

### Comment or Suggestion

1501 Lucas Valley Rd (c-18) identified for 26 above moderate housing is not recommended for the housing element. This area is mainly on the slope of the hillside. It is a high wind area that is a fire hazard as well as Lucas Valley Rd being the only access road. This road serves the residential housing of Lucas Valley and is the sole road to escape fire. We have Talus housing going in down the road so density is already increasing. Building on a hillside 26 units is not in keeping with the area which has neighborhoods in the valley and not ridgeline construction. Visually it is

unappealing to have 26 homes looking down on the residents below. There is already enough new housing going into the Lucas Valley Rd Corridor (Talus, 70 Mt Lassen possibly, Juvenile Hall possibly)-a road that has been attempted to be designated a protected scenic road in the past. The neighbors in Lucas Valley fought to keep the opposite mountain undeveloped and bought out the old ranch to prevent ridge development and deeded it to CSA 13. This is antithetical and repugnant to this community to build up the hillsides. Re: C-14 St Vincents this is one of the last remnants of old Marin along Hwy 101. Cows graze and the old building remain. The density and number of units is really a massive development that is insensitive to this area. Also the impact on the schools and services with over 600 units is really too much for one location. That being said, I do support Marinwood Plaza area, the Juvenile Hall area (low density senior housing like Rotary that is there), 70 Mt Lassen adaptive reuse. This is an 8 year plan. After that there will be subsequent plans for years. My question really is when do we hold the line on building additional housing? There is a finite amount of resources: water, increased fire danger, declining tax base to support low income. We should be able to put a cap based on what the area can sustain and still maintain the quality of life that Marinites want-nature, clean air and water, decent schools, no traffic congestion. Don't change Marin to meet a one size fits all State mandate-we do not want to be Emeryville, Fremont, San Jose or Los Angeles. I think Marinites would almost agree to pay the penalties that the State would impose to avoid radically transforming their quality of life. Keep Marin beautiful-adaptive reuse of existing Commercial building is the solution to meeting our housing numbers within areas that have public transport and existing infrastructure.

**From:** [R.R.](#)  
**To:** [housingelement](#)  
**Cc:** [drondoni@marincounty.org](mailto:drondoni@marincounty.org)  
**Subject:** County Draft Housing and Safety Elements  
**Date:** Thursday, June 30, 2022 9:25:54 PM

---

Please do not change the A60 conservation zoning. It has served us well for decades and preserved some of our most iconic areas.

R. Reichard  
18140 CA-1  
Marshall 94940

**From:** [Bill Fridl](#)  
**To:** [housingelement](#)  
**Subject:** Draft 2023-2031 Marin County Housing Element  
**Date:** Thursday, June 30, 2022 9:50:49 PM  
**Attachments:** [image001.jpg](#)

---

Hi there,

I live in greater Mill Valley. These hills are going to burn during my lifetime (and I'm old!) It's possible that hundreds will die, unable to get off the hills to safety because the roads couldn't handle the exodus.

And Marin bureaucrats are still trying to squeeze in more housing. Because some other bureaucrats said to.

Ridiculous...

Bill Fridl  
222 Cleveland Ave  
Mill Valley, CA

Oakland Firestorm 1991 - Oakland - LocalWiki





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Jennie Pfeiffer

### Community You Live In/Represent

BOLINAS

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

Jenniepfeifferr@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

It cannot be overstated the importance of bearing in mind: water shortages; carbon emissions as well as safe emergency community egress impact from increased vehicular traffic in downtown areas of small communities; septic/sewer limited system concerns; impact of rainwater run-off over paved surfaces into storm drains flowing into protected bodies of water; negative impact on families of high density housing without adequate private patio or outdoor living spaces. Housing developments must have adequate affordable units and just because people need affordable housing doesn't mean lower standards for quality of life requirements are acceptable.





Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Maureen Sedonaen

### Community You Live In/Represent

Marin County

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

msedonaen@habitatgsf.org

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

As a partner to the County of Marin, Habitat for Humanity Greater San Francisco thanks the staff and community for their efforts to develop this draft Housing Element. With 14 homes built or acquired across the County, and more than 80 homes slated for development in Novato, we are committed to strengthening our partnership with businesses, residents, and local government to create and preserve affordable homeownership and all forms of affordable housing across Marin County.

As the costs to build homes escalates, we strongly support the range of housing production policies and programs that the Element has outlined to streamline approvals, facilitate

permitting, identify buildable sites, reduce costs for development, and improve inclusionary housing program consistency across jurisdictions. We also support the range of policies and strategies that the Element outlines to preserve existing affordable housing and protect tenants from eviction.

We wanted to acknowledge the range of options that the County will continue to offer to incentivize affordable housing (Program 25 on page 218) are critical to future new home production. Given the scale of need identified in the most recent RHNA for very low-, low- and moderate-income housing, we'd like to see a more aggressive goal than the 200 units over eight years that is currently proposed on page 219.

We also encourage the County to consider modifying their proposal for the BMR Homeownership Program (Program 26, on page 219) to include not only efforts to preserve the existing 90 homes in the County's BMR program, but explicitly invest in growing affordable homeownership for low- and moderate-income households. Given the unique intergenerational and community benefits of Affordable Homeownership, particularly given the growing racial wealth gap, we recommend that the Housing Element set a meaningful target for new affordable homeownership opportunities.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Karri O'Bryan

### Community You Live In/Represent

Marinwood

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

karriwilliams@yahoo.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Comment or Suggestion

I am strongly opposed to this project.

I would like to understand:

1) Where do you plan to source the water for completion of the project, and what are your plans for the long term water supply for the residents of this community? We are already living in a drought in Marin County. If there isn't enough water to supply our existing needs, what is the rationale for adding to those needs?

2) What is your plan for education for students that move into this community? We have two children in elementary school and class size for both ages already increased by 30% from 2020-2021 to 2021-

2022. Are you planning to build a new school and fund it with teachers and administrators?

Your perspective is appreciated.



Thursday, June 30, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

Gwen Anderson

### Community You Live In/Represent

Greenpoint / Atherton Corridor - Rush Creek  
Preserve

### Please select the best way to reach you in case there are questions about your submission

Email

### Email

ptcnovato@gmail.com

## Housing Element Section

Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.

General

### Page Number

25

### Comment or Suggestion

(page 6 and 25 and general) Unincorporated Marin has no representation in ABAG. These open space areas DEFINE Marin. They are unique to this area, to the Bay Area, to California. They are also sensitive ecosystems. There is no model that shows when housing costs are reduced people will live near their work. There is the effect of LAND USE CLIMATE CHANGE. When you take away the wildlife corridors and replace with asphalt and hard surfaces, the climate changes instantly. In cities this leads to the Urban

Heat Island Effect. Obviously these areas have been preserved and protected for generations and are now called "underutilized" which is yet another euphemism in the overdevelopment scandal. Building dense housing 2.5M homes all over California will produce an influx to the state and not solve the problems purported. I am tired of the name-calling NIMBY and YIMBY since it is not true. I do want development in my backyard, at the Fireman's Fund site where the train stops at a now ghost town. But overdevelopment anywhere and everywhere will deepen the recession. The US printed currency to pay for pandemic expenses which devalues the dollar and drives up the price of tangible assets (but not the value in "real" terms). Now investors want to "print" housing for investments just like currency, for instance Jeff Bezos of Amazon who will be allowed make a stock market out of houses, while we all need houses to live in. Please do not allow housing to be commoditized. We need to come up with real solutions such as Section 8 housing vouchers that can be used, fair wages for educators and health care workers (which government took away), programs that provide housing to the people who work here in necessary occupations and people who grew up in the area and have family here, rather than every person in the world who wants to live in California ("the demand"). The current capitalist mechanisms drive housing prices up, and while we have work from home (WFH) options that mean people could live in lower cost areas, unique landscapes like Marin will always attract whomever can afford to be here, in droves. So of course developers can sell as many homes as they can possibly build. But what about the 40,000 vacancies in San Francisco held by speculators to manipulate a housing shortage to drive up rents, and all of the commercial buildings not needed due to WFH, can we not start there? ABAG had no business allocating crass dense development to unincorporated Marin. Atherton Corridor and Rush Creek are the sites of a rare shore bird migration. If you are going to build then it needs to be under biodynamic zoning, not mansions and not dense condos. The building needs to respect the natural surroundings, without creating night time lights and noise that harm the habitats. Rush Creek is both historic and prehistoric. A fiscal policy to make college affordable again will bring temporary labor from college students who can afford to pay their own way through school, and not create a demand for lifetime low wage earners. It is midnight so I will submit what I have!

**June 30, 2022**

Thomas Lai,  
Director  
Marin County Community  
Development Agency  
3501 Civic Center Drive, Room 308  
San Rafael, CA 94903

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

**RE: Marin County Housing Element Opportunity Site List**

Tom and Leelee,

As the owner of the properties in San Anselmo at 404 San Francisco Blvd, 60 Sacramento Ave, 4 Sacramento, and in contract to purchase 1 Sacramento Ave (APNs: 177-203-03, 04, 09 and 177-220-10 and 41), we are thankful for inclusion in County's Housing Element site inventory list. As you are aware, we are actively planning for the redevelopment of the site into a multi-family rental housing project. At this time, we are not seeking public funding or grants to support affordable housing construction in the proposed project. That said, we are planning to adhere to the current County standard of 20% affordable of the total number of units in the project. Our project is not financially viable at 56 low-income affordable units as projected in your inventory list designation for the site. That said, we are committed to developing a unique and economically diverse multi-family residential rental project with a myriad of attainable unit types including market-rate, senior, affordable, and micro-units. We continue to develop a working matrix for the overall project, but do not yet have a final unit count.

Furthermore, I understand that the County has adopted an inventory buffer of 15 percent capacity to accommodate for lower income units pursuant to the Regional Housing Needs Assessment (RHNA) requirements for the No Net Loss Law (Chapter 367, Statutes of 2017 (Senate Bill 166)). We are committed to retaining/replacing the existing units on site and building affordable housing in our development as required by the Marin Development Code. However, in order to construct the number of units outlined in your Housing Sites inventory, a much greater density, and/or incentives and financing would be needed to achieve the identified goal so as to not impact the No Net Loss buffer. As a small, local, independent builder, I do not have the intention, nor the financial backing, to develop a project that could support such an expansion needed to meet the identified units in the County's inventory list. By the County's existing inclusionary housing requirements of 20% affordable units per project, to provide 56 low-income units, a project would require 280 total units to be developed, which is completely inconceivable and non-supportable for the small project site.

Consistent with our previous conversations, I am requesting confirmation from you and your staff that your analysis of our project site in the Housing Element considers a traditional mixed income/market rate development with a density range of 30 units per acre. We will continue to follow the Housing Element process but understanding the planning and environmental limitations for these properties will help shape the final project, which will provide the much-needed additional rental housing units for Marin County and the greater San Anselmo community. My project team continues to evaluate the site

conditions and aims to produce a working site plan later in 2022 or early 2023. We eagerly anticipate the findings of your update and environmental review.

Please do not hesitate to call me at (415) 596-3655 or contact me via email at [mikefolk@yahoo.com](mailto:mikefolk@yahoo.com) if you have questions or concerns regarding this request. I am looking forward to the results of the Housing Element update.

Sincerely,

Mike Folk

cc: Sean Kennings, [sean@lakassociates.com](mailto:sean@lakassociates.com)



**From:** [Thomas, Leelee](#)  
**To:** [housingelement](#)  
**Subject:** FW: Draft Housing Element Comments - TAM  
**Date:** Friday, July 1, 2022 8:31:01 AM  
**Attachments:** [6d - Attachment A - MEF Report 083018 - Final -dc.pdf](#)

---

---

**From:** Derek McGill <DMcGill@tam.ca.gov>  
**Sent:** Thursday, June 30, 2022 4:01 PM  
**To:** Thomas, Leelee <LThomas@marincounty.org>; Zeiger, Jillian <JZeiger@marincounty.org>  
**Cc:** Jones, Sarah <sbjones@marincounty.org>; Anne Richman <ARichman@tam.ca.gov>  
**Subject:** Draft Housing Element Comments - TAM

Hi Leelee and Jillian,

Congratulations on completing the draft housing element update! A couple comments for consideration:

- Jobs/housing balance – US Census LEHD data does not include estimates of the self-employed, and Marin county has among the highest rates of self-employment in the bay area. Consider reviewing additional data sets to account for work from home categories, and revising discussions on transportation issues resulting from this inclusion. MEF analysis prepared for TAM (attached) has demonstrated that the LEHD data set can overrepresent county to county traffic flows (62% in commute shown in LEHD, compared to 33-36% in commute at the county level).
- Expand discussion on applicability of housing element sites to demonstrate consistency with low VMT communities. TAM has developed VMT web maps that allow jurisdictions to plan for housing sites in low VMT areas served by transit and active transportation modes. Supporting the qualitative assessment on page 92 with analysis to confirm that these sites are in low VMT communities would be helpful to verify the assertions made in the document and support demonstrating equity through reduced housing & transportation costs.
- Marin Transit agency – please update this reference to Marin County Transit District (MCTD).
- Housing & Transportation Costs – consider expanding the discussion on housing costs to include housing & transportation costs, the second largest household expense.
- Consider adopting VMT policies to streamline development in low VMT areas. – the county currently does not have adopted VMT policies. Consider identifying adoption of VMT policies as a supportive housing development action.
- Coordinate with TAM and transit operators early in the design process to support transit integration on new development. – as the housing element adoption proceeds, please coordinate with TAM and transit operators on how to serve housing element sites with transit or non-single occupancy vehicle modes. The housing element should support housing that is not required to depend on SOV trips. Engagement early would allow for informed decisions on transit service opportunities, including routing, frequency and service types, or other low VMT transportation opportunities.

Thanks for the consideration, and congratulations on the milestone! Happy to discuss further at your convenience.

Best,

Derek McGill, AICP  
Director of Planning  
Transportation Authority of Marin  
[dmcgill@tam.ca.gov](mailto:dmcgill@tam.ca.gov)  
(415) 226-0825  
900 5<sup>th</sup> Avenue, Suite 100  
San Rafael, CA 94901



**Origin-Destination Employment Levels and Data Sources  
A Primer**

**August 2018**

---

## Origin-Destination Employment Levels and Data Sources A Primer

### 1. Introduction

This study examines current data (as of August 1, 2018) on commuter origins and destinations data in Marin County, California. This study was commissioned by the Transportation Authority of Marin (TAM) to provide an overview of data sources on workforce and commuting. The deliverables of this report include:

- An overview of differences in methodology and survey design among major data sources;
- An overview of the differing sources of data;
- A high-level reconciliation of available data sources used to determine an estimated number of in-commuters; and
- Provide recommendations on appropriate data sources for employment population and commute traffic data.

Generally, there are four sources of employment and worker information for Marin County and other counties throughout the United States. These include:

- the US Census American Community Survey (2013 and 2016, see <http://factfinder.census.gov>);
- the Longitudinal Employment-Household Dynamics or LEHD database (2015) also of the Census Bureau (see <http://lehd.ces.census.gov>);
- US Bureau of Economic Analysis (2016) (see <http://www.bea.gov>);
- and state employment data from the Bureau of Labor Statistics (BLS) reported by the California Employment Development Department (EDD, see [https://www.labormarketinfo.edd.ca.gov/data/Quarterly\\_Census\\_of\\_Employment\\_and\\_Wages.html](https://www.labormarketinfo.edd.ca.gov/data/Quarterly_Census_of_Employment_and_Wages.html)).

In addition to these employment data sources, MEF reviews the TAM Origin and Destination Study Draft report along with Caltrans traffic count information provided by TAM. Plan Bay Area, prepared by the Metropolitan Transportation Commission of California (MTC), provides long-term forecasts of employment, households and population in an attempt to accommodate projected traffic flows and development for new housing units to 2040.

This study has three sections from here. Section 2 provides a brief overview of the data sources, background information on how those sources gather data, and what each source is trying to measure. No source is solely measuring the flow of people to work and back home, but the LEHD and ACS have specific components that do so. Section 3 looks at recent data to compare and contrast each database and attempt to reconcile similarities and differences. Section 4 provides conclusions.

## 2. Employment Data Sources and Overview

It is important to note the distinction between jobs and workers reported in different sources of employment data. A single worker may have multiple jobs; for example, a business owner who also manages a national chain's retail store, may be counted as two jobs. Additionally, if that same store has multiple business owners, this may be reported as multiple jobs, even without those owners performing any work duties. The dichotomy between "payroll" employment (workers who are eligible for unemployment insurance and have taxes paid to finance that insurance fund) and those working for a self-employed business is a key difference and may unlock reasons why differences exist in reported commute pattern data.

We see below that the major databases are concerned more with reporting the number of workers, and using payroll employment surveys and employee counts as the data's bases. Self-employed is more difficult to measure, but is estimated by both the Census Bureau's American Community Survey (ACS) and also the Bureau of Economic Analysis (BEA) as shown below. We start with the Quarterly Census of Employment and Wages (QCEW), as reported by California Employment Development Department (EDD).

### *QCEW and EDD Labor Market Data*

Employment data for Marin County come from multiple sources, and we will focus on three sources. California EDD and the Bureau of Labor Statistics (BLS) work in concert to provide data on employment and occupations. Data on employer hiring levels come in two forms, where one source informs the other:

1. Monthly Estimates of Employment and "labor market information", reported as excel spreadsheets for every county in California; and
2. The Quarterly Census of Employment and Wages or QCEW.

The QCEW program and its data (as reported by California EDD) tracks employment and wage information for workers covered by state unemployment insurance (UI) laws and also federal workers covered under the federal unemployment program. The QCEW is produce for all 50 states, and all 3,142 counties or townships in the Unites States. The Bureau of Labor Statistics (BLS) is the federal government's repository for these data. Payroll survey data, mainly compiled from quarterly payroll tax submissions by employers to determine UI eligibility, generate QCEW source data.

Notice the QCEW has the word "census" in it on purpose: the data come from survey or census-like data gathering. An employer fills out the payroll data and submits the data. When published and released to the public, the QCEW is the federal government's official statement (unless there is a future re-benchmarking exercise to revise old data) on the number of people working. Figure 1 shows four major categories of employers (private businesses and three levels of government employers) from 2002 to 2017 for Marin County. Figure 1 is the number of people working for an employer in Marin County, regardless of where the employee lives.

Figure 1: QCEW Labor Market Data, **Working in Marin County**, 2002-2017

Year	Total	Fed	State	Local	Private
2002	111,854	977	1,783	11,231	97,863

---

2003	109,696	958	1,798	10,782	96,159
2004	109,601	928	1,849	10,723	96,101
2005	108,903	895	1,842	10,721	95,444
2006	108,984	905	1,874	10,678	95,527
2007	108,655	683	1,929	10,963	95,081
2008	109,340	909	2,117	11,127	95,187
2009	102,632	896	2,136	11,010	88,590
2010	102,062	910	2,129	11,447	87,576
2011	102,656	819	2,128	12,066	87,644
2012	106,021	789	2,002	12,107	91,123
2013	108,850	750	1,883	12,177	94,039
2014	110,424	747	1,815	12,103	95,758
2015	112,056	744	1,954	12,383	96,975
2016	114,063	738	2,004	12,491	98,830
2017	115,421	747	1,978	12,702	99,995

Source: QCEW ([www.bls.gov/cew](http://www.bls.gov/cew))

These QCEW data then inform multiple organizations, such as the Bureau of Economic Analysis (BEA) quarterly GDP and employment estimates. The BEA uses QCEW surveys and estimates as a benchmark for estimates of gross domestic product (GDP) and personal income data. The BEA also publishes labor-market data across many industries and for all counties, though these data are not the same as reported by QCEW. Part of the BEA data, as we see later, includes an estimate on the number of workers not working in jobs for self-employed (non-payroll and not eligible for state unemployment insurance programs), called “Proprietor Employment” in the BEA data, which means working for a self-employed business in Figure 2. These data on self-employed business hiring may be a missing link between datasets on commuting as shown below.

Figure 2: BEA Employment Data, QCEW benchmark, Marin County, 2002 to 2016

Year	Wage/Salary	Self- Employ	Totals
2002	121,452	55,646	177,098
2003	119,113	56,863	175,976
2004	116,942	59,132	176,074
2005	115,738	60,049	175,787
2006	116,395	60,810	177,205
2007	117,265	64,070	181,335
2008	117,396	64,981	182,377
2009	110,440	66,510	176,950
2010	109,769	66,992	176,761
2011	110,433	68,471	178,904
2012	114,559	68,431	182,990
2013	118,174	70,267	188,441
2014	120,382	71,582	191,964
2015	121,978	72,508	194,486
2016	123,557	74,364	197,921

Source: BEA ([www.bea.gov](http://www.bea.gov))

The U.S. Census Bureau produces two complementary data products, the American Community Survey (ACS) commuting and workplace data and the Longitudinal Employer-Household Dynamics (LEHD) and its Origin-Destination Employment Statistics (LODES). Both datasets can be used to answer questions

relating to workplaces and the flow of people from where they live to work and back again. The products are complementary in the sense that they measure similar activities. They are also compared at length by public policy advocates on opposing sides of traffic and commute and infrastructure funding debates because the implications from each dataset have been different.

The LEHD Origin-Destination Employment Statistics (LODES) are the basis commute data measured inside the LEHD. Studies on the LODES data and methodology describe this proves as combining different source documents of count data rather than extrapolate from survey data that are one to five percent of the population then extrapolated as in the ACS.<sup>1</sup> A recent Census report (2017) suggests that the LODES data understates the in-county commute versus the ACS in-county commute by almost 18 percentage points. However, on an employer match model (ibid), the ACS and the LEHD through LODES would predict about 54.9 percent within county commute rates on average; this 2017 study attempts to reconcile the differences in these databases.

Design differences seem to be the key place where ACS and LEHD differ becoming differences in the data; part of the LODES/LEHD design is to not count self-employed workers, where the ACS does. The LEHD/LODES data are worker-specific data that link worker records to where they live. This is connected to the QCEW and ultimately the Census Bureau's quarterly workforce indicators (QWI, see <https://qwiexplorer.ces.census.gov/static/explore.html>) that utilize more complete aspects of employer surveys from the QCEW. In theory, these LEHD data cover 96 percent of the workforce that are eligible to collect unemployment insurance (are not self-employed or work on contracts such that they must pay self-employment tax).

One of the key concerns with the LEHD is multiple employer locations. In the LEHD model, if there are two locations, as an example, the default address for the employee is the closer location. This location may not be where the worker works, nor in the correct county where the worker works. In the case of multiple locations, the FTE is allocated to each location in a proportional way, though the worker (FTE) has one employment address. Such a model can also help explain longer commute times in the LODES data by providing probability weights to employer locations that have little meaning to a worker.

Figure 3 show the LEHD data that are comparable to the QCEW data on who works in Marin, regardless of where the workers live (shown in Figure 1), as well as the data on who lives in Marin County and is part of the labor force (the measurement of local residents that are working in jobs that are part of payroll surveys that determine the unemployment insurance eligibility in California).

---

<sup>1</sup> Please see the "References" section of this paper for studies that provide strong descriptions and understanding from comparing these datasets.

**Figure 3: LEHD and QCEW Labor Market Comparison, 2002-2017**

**Workers in Marin County who live anywhere and those that Live in Marin County and Work Anywhere**

Year	LEHD Works in Marin	QCEW/EDD	Inbound LEHD %	Outbound LEHD %	LEHD Lives in Marin	EDD Civilian Employment
2002	105,571	107,300	55.0%	52.0%	98,822	128,000
2003	101,803	106,700	55.7%	52.6%	95,202	124,300
2004	100,780	105,800	56.6%	53.1%	93,248	123,500
2005	103,716	105,000	57.2%	52.6%	93,569	124,100
2006	103,269	106,000	57.1%	53.2%	94,516	126,000
2007	103,381	107,100	59.2%	56.2%	96,357	127,100
2008	105,208	107,900	59.5%	57.2%	99,656	126,000
2009	102,818	101,300	59.9%	57.2%	96,319	122,100
2010	101,475	100,800	60.1%	58.4%	97,407	122,600
2011	103,790	102,700	60.7%	59.4%	100,428	124,800
2012	104,964	105,800	61.4%	59.8%	101,007	128,300
2013	108,172	109,700	61.9%	60.2%	103,532	131,200
2014	109,639	110,900	62.0%	60.5%	105,625	133,200
2015	112,471	112,300	62.5%	60.1%	105,779	134,600
2016		114,500				135,700
2017		116,000				137,300

Sources: LEHD (<http://onthemap.ces.census.gov>) and QCEW ([www.bls.gov/ces](http://www.bls.gov/ces))

Commuting statistics (or Journey-to-Work) are tabulated from the ACS. Questions about transportation pertain only to work travel. ACS estimates related to commuting are derived from a sample of workers 16 years and over who worked during the ACS reference week, the calendar week preceding the date respondents completed their questionnaire. The ACS questions related to travel focus solely on commuting and do not ask about non-work travel. Respondents answer questions about where they work, what time they leave home for work, the means of transportation used to get there, the number of workers riding in the car, truck, or van, and how long it takes to travel to work.

The ACS attempts to provide annual updates to the 10-year census using a 1- to 5-percent sample. A pooled dataset over five years provides something closer to the sample size of the decennial census, which aims for one in six households. It is from the five-year pooled sample that commute data are estimated. Unlike the LEHD/LODES data, the ACS is not able to provide sub-county estimates of commute patterns or flows.<sup>2</sup> A difference between the ACS and the LEHD is the self-employed are not counted in the LEHD and are estimated in the ACS as part of the broader survey of the working population.

Figure 4 shows the ACS data for those that live in Marin, which include the self-employed; the second panel of Figure 4 are those that work in Marin and the those that work for self-employed businesses, regardless of where the worker lives (based on “workforce geography” versus “resident geography”). These data are, based on the geocoding of where people claimed they work on the survey versus where workers say

<sup>2</sup> Through the ACS, “Journey to Work” data provides county to county flows. These data are also available at the California EDD for 2006 to 2010 (see <https://www.labormarketinfo.edd.ca.gov/data/county-to-county-commute-patterns.html> for more), but there are some journey to work data available for Marin County from the ACS directly through 2016.



they live, determine the commute patterns reported by the ACS and Public Use Microdata System or PUMS data. Figure 5 provides the percent commuting, for those that report in the ACS that as workers they working inside Marin County, versus outside.

Figure 4: ACS Labor Market Data, 2007 to 2016 (Three and Five-Year Averages)

Year	Lives in Marin	Self Employed	Works in Marin	Self Employed
2007	121,198	22,267	125,498	21,029
2008	124,678	22,965	128,925	20,802
2009	121,210	22,241	124,599	20,653
2010	121,354	22,075	124,267	20,398
2011	121,068	21,797	124,749	20,084
2012	122,388	21,554	126,017	19,961
2013	121,269	20,444	124,550	19,277
2014	122,993	20,013	125,849	18,780
2015	125,612	19,816	128,242	18,919
2016	127,178	19,775	127,518	18,507

Source: ACS (<http://factfinder.census.gov>)

Figure 5: Commute Data, Marin County, Percentage of Workers (%), 2007 to 2016 (Three and Five-Year Averages), ACS

Year	Marin Resident		Data Comparisons	
	Works Inside Marin County	Works Outside Marin County	Implied Inbound Workers	LEHD With BEA Self-Employed
2007	66.5	33.5	33.5	33.7
2008	66.1	33.7	33.9	34.3
2009	65.7	34.3	34.3	34.8
2010	65.1	34.0	34.9	34.5
2011	65.3	33.6	34.7	35.2
2012	65.8	33.7	34.2	35.2
2013	65.7	34.5	34.3	35.5
2014	64.9	34.4	35.1	35.4
2015	65.1	35.4	34.9	36.2
2016	64.0	33.5	36.0	36.2

Sources: ACS (<http://factfinder.census.gov>) and LEHD (<http://onthemap.ces.census.gov>)

#### *Forecasts of Workers and Population: Plan Bay Area*

Plan Bay Area's forecast goes out in 5-year increments, we show through 2025 here). The forecast sources use the above, official statements about employment as a benchmark and then forecast from there. None of these discuss inbound commuting. Plan Bay Area (see <http://www.planbayarea.org> for more, though the report that we use here came from TAM staff) reports the level of payroll employment as 131,000, with a 2010 benchmark of 115,855 workers.

Figure 6: Plan Bay Area Employment and Population Forecast, 2010 Benchmark, 2010-2040

Year	Employment	Growth Rate from 2010	Pop	Growth Rate from 2010
2010	110,420		253,975	
2015	129,890	17.6%	262,375	3.3%
2020	130,635	18.3%	265,845	4.7%
2025	131,180	18.8%	269,215	6.0%
2030	132,355	19.9%	274,500	8.1%
2035	132,100	19.6%	278,180	9.5%
2040	131,540	19.1%	282,640	11.3%

Source: Plan Bay Area (data file provided by TAM staff), [www.planbayarea.org](http://www.planbayarea.org)

These data suggest relatively slow rates of population growth through 2040, suggesting as Marin County's population grows more slowly than its employment levels, there will be more inbound commuting growth versus outbound commuting, which looks to switch in the 2030s. The labor force participation rate is another factor to watch in terms of how new residents become new workers available for work or working or not (e.g. retired residents). There are other, private databases and firms (such as EMSI at [www.economicmodeling.com](http://www.economicmodeling.com)) that attempt to estimate commute flows, but all use these government sources as a benchmark and do so through 2028.

Before we summarize the labor market data and the implications of the databases that report commute statistics, let's review a recent study by Transportation Authority of Marin (TAM) on traffic counts and commuting.

#### *TAM Origin and Destination Study 2018*

Most studies of traffic flows involve a physical count at a point in time, normally at a major connection between highways or at a county line. Such studies are then supplemented by surveys and other third-party data to round out the data sourcing. Like some of the other studies shown here, survey work is a sample and then used as a basis for extrapolation; like the LEHD, TAM generally tries to match data from counts with specific data (license plates provide DMV records on resident origin addresses to match destinations) to complete the count.

The 2018 TAM origin and destination study used a purchase of GPS data using cell phones to locate people and determine locations and where trips begin and end, included home to work based trips for Marin County residents. Saving time on data collection and being able to track person by person using geocoding and "big data" techniques was a major component of this 2018 study by TAM. Intra-county trips are considered easier to gather, as the origin and destination are the same county and there is no need to consider the initial destination further. Linking this to worker flows was not the intent, short of indirectly estimating movement of Marin County residents going to work. Mobile device data of three types were used: countywide data on trips; specific origin-destination data between pre-designated zones; and home-work locations for outbound, Marin County residents that commute and presumed (due to the time of the day) to be going to work when their cell phone is moving on the map.

The TAM Origin and Destination study estimates that the 57 percent of Marin County residents (who are workers) work in Marin. TAM consultants used the ACS estimate of 121,269 workers in Marin County to extrapolate home to work trips for residents. This data suggests that 69,123 workers live in Marin county, and the remainder of the workers, 52,146 (or 43 percent) commute in, larger than the vehicle counts that were conducted.

There are many reasons why trips may be fewer than the number of worker that commute in: carpools; use of mass transit; etc. Because the focus what on residents of Marin County, the outbound location was also a goal of TAM's work. The link to the data above is generally here, as the use of ACS data on "Journey to Work" fills this gap. The study shows that GPS cell-phone data during peak commute times closely matches the number of implied commuters and the numbers are close.

The data used in this report was over 75 million trips. The focus on trips showed that most trips were intra-county, an estimate of 72 percent. TAM concludes that Marin County imports more workers than it exports, with approximately 22,300 trips into Marin County from outside and 15,870 trips from Marin County to other counties during peak commute times. San Francisco is the dominant, outbound location with 52 percent of trips. Most intra-county trips originate in San Rafael and end in San Rafael.

There are 30 "origin" zones in Marin County and 10 destination zones outside the county to help identify flow. Also, some of the cell-phone data were of select "links" to look at trips between specific areas of interest. Examples include: US 101 at the Marin-Sonoma counties line; both north and south of San Rafael; and east and west of US 101 at Sir Francis Drake Blvd.

Some of the basic data conclusions in the TAM study concerning the flow of workers include the following:

- Census data indicates there are approximately 120,000 workers who live in Marin County with approximately 34 percent travelling outside of Marin County for work (28 percent of residents work in San Francisco County).
- Factoring of the census data based on the home and work zone data indicates that approximately 70,000 Marin County residents work in Marin County while approximately 34,000 work in San Francisco County.
- The city with the highest percentage of residents working in San Francisco is Sausalito (57 percent) and the city with the lowest percentage of residents working in San Francisco is Terra Linda/Northern San Rafael (16 percent).
- Census data indicates there are approximately 125,000 workers who work in Marin County with approximately 35 percent living outside of Marin County.

The TAM study uses a clever, modern approach to trip counts and has data on flows of worker that links closely to findings from major governmental sources and also to the reconciliation shown above. The self-employed worker, the resident of Marin County that also works at home or close to it, may generate many of the intra-county trips shown in these GPS data once school commute times are completed. However, the TAM study and conclusions do not address the self-employed versus payroll employment; while we assume for purposes of origin-destination counts that those working for a self-employed business have a work destination and a

home origin that are generally the same for trips purposes, some error in worker movement counts come from this measurement problem. The next section summarizes our findings.

### 3. Data Summary for Latest Available Data

To help close the loop on the above database differences, this section provides the latest data (as of August 1, 2018) on employment levels, self-employment levels, commuting volumes (inbound and outbound commuting), and the commuter destinations and origins.

1. As of June 2018, there are approximately 117,600 people working at jobs covered by unemployment insurance (part of the payroll surveys and tax structure done by California EDD monthly and quarterly) for employers inside Marin County. This number is called “Total Employment” in the dataset from California EDD.
  - a. The number of Marin County residents that are working at jobs covered by unemployment insurance is 136,300 people, what is sometimes called “Civilian Employment” in the data but is really “Residential Employment for Jobs Covered by Unemployment Insurance” or from here “Residential Employment”.
  - b. See <http://www.labormarketinfo.edd.ca.gov/data/employment-by-industry.html> for the datasets.
  - c. This does not include the self-employed.

In a crude but logical way, the difference between these two numbers provides some sense of **net** commute flows. For example, if Residential Employment is greater than Total Employment, it suggests net **outbound** commuting; if the opposite inequality, it suggests net **inbound** commuting. The logic is simple: if there are more working residents than jobs available, those working residents must be working some other place besides Marin County in net. Because these data do not show the self-employed, we must look elsewhere for the self-employed figures, where the ACS and the BEA data provide more details and the other databases do not.

2. As discussed, the Census Bureau’s Longitudinal Employer-Household Dynamics or LEHD database (see <http://lehd.ces.census.gov>) uses the payroll surveys that help determine the EDD estimates (which use the QCEW data and the monthly tally from those QCEW surveys as the basis of what is reported in the employer section of the EDD data). Because the LEHD uses multiple data sources, the reported data tends to lag two or more years (similar to the ACS data but a longer lag). Similar to the EDD data, there are no self-employment figures reported in LEHD.
  - a. December 2018 is the release data for the 2016 LEHD data;
  - b. In 2015 (the latest data), a total employment level of 112,470 workers who may live in anywhere.
    - i. The analogous number from EDD, which is an annual average of sorts and reported different than the monthly data is 112,300 workers, which is close;
    - ii. These numbers should be close as they come from the same database in theory (QCEW);
  - c. Further detail in the LEHD suggests 62.5% or 70,310 of these 112,470 people work in Marin County at payroll jobs commute in from elsewhere;

- d. The percent in-bound commuting to Marin County for payroll fluctuated between 59.2% and 62.5% between 2007 and 2015 according to LEHD; and
  - e. Holding that percentage at 62.5%, for May 2018 that implied approximately 73,500 payroll workers are inbound commuters.
3. Looking at the number of working residents, there is a large discrepancy between the datasets.
  - a. LEHD in 2015 reports 105,780 people living in Marin County and employed;
  - b. EDD reports 134,600 in Civilian Employment;
  - c. The implied difference is not made up by reducing the number of local residents who are “non-civilian” in Marin County; and
  - d. This is a major issue with the LEHD data, as it understates the residential employment level, which can then understate the outbound commuting level.
  - e. By further implication combining the recent EDD data and the 2015 LEHD percentage, 37.5% or 44,100 payroll workers live and work in Marin County.
4. The American Community Survey (ACS) (<http://factfinder.census.gov>) on commute patterns. The latest data comes from the “Public Use Microdata System” or PUMS as of 2016:
  - a. 44,800 workers (38 percent) in Marin County are inbound commuters (live elsewhere but work in Marin County), which implies that there 117,915 workers.
    - i. 73,115 workers by implication of the LEHD numbers above both live and work in Marin County.
    - ii. ACS is not clear about these workers employed by payroll employers or self-proprietors (see below for more on this dichotomy).
5. The Bureau of Economic Analysis (<http://www.bea.gov/regional>) estimates payroll (what it calls “wage and salary”) employment as well as self-employed (what it calls “proprietors employment”) jobs for all counties in the United States. The latest data are from 2016.
  - a. For Marin County, the estimate for payroll employment is 123,557 workers in 2016, and self-employed is 74,364 workers (these workers are employed by self-proprietor businesses and those eligible for unemployment insurance).
    - i. There is not an analogous residential employment number in the BEA data;
    - ii. The California EDD figure for 2016 residential employment is 135,700, which implies that there may be as many as 210,000 “workers” living in Marin County when self-employed workers are included; and
    - iii. This does not discern between workers with self-employment and payroll income.
  - b. These two points imply 197,921 workers in Marin County on payroll or working for a self-proprietor, or about 13,000 people net **outbound** commuting in 2016;
  - c. LEHD reports a net **inbound** commuting of 6,600 people; but
  - d. Some of these workers are double-counted because they may earn both payroll and self-employment income.

#### 4. Conclusions

While these estimates have different dates and different assumptions, traffic counts and recent data from TAM point to a rising number of vehicle trips per day likely coming from workers that work in Marin County and live elsewhere. The snapshot data above all come from time series data, and we can track back to 2010 on all these data (ACS oldest data on commute patterns is 2009). To reconcile the datasets means some wild algebra and assumptions about how the data may match up. The LEHD data on payroll comes from payroll data, tax return data, and a point estimate of all the data available, not a survey estimate from a sample (like ACS data are). In considering the number of workers in transit, this study showed several databases on employment and commute patterns. Combining some of these data and recognizing where data are missing or not accounted for can help. Here is how one may surmise and summarize the data above.

1. The QCEW/BLS/EDD employment counts are the official statement of employment in an area by our state and national governments. However, these only count workers eligible for unemployment insurance (payroll workers), not the self-employed.
2. The BEA uses these data as a basis for their estimates of macroeconomic data, as well as employment, and also estimates the number of workers not eligible for unemployment insurance (self-employed or working as a contract worker for another employer).
  - a. The self-employed are considered to not be commuting anywhere to a job location otherwise.
3. The LEHD data measure the flow of payroll workers, and do not include estimates of the self-employed.
  - a. The basis for these estimates includes the QCEW data, which are also the bases of the payroll (wage and salary) employment data for the BEA.
  - b. The LEHD uses other data on where workers live to match up the flow of workers from home to work and back and is a precise estimate for payroll workers.
4. The ACS uses a census-like survey instrument and matches the number of workers that live in a place (resident geography) with where workers identify is the place they work (workplace geography).
  - a. These data in combination allow the ACS to estimate the “county-to-county” flows of people for work, giving a similar number as the LEHD figures.
  - b. The ACS data also attempt to estimate the self-employed, thus giving a percentage of overall workers that move between two counties, or in total toward a specific county.
5. In Marin County, the percent of inbound workers as reported by the ACS (a rolling five-year average since 2009 and a three-year rolling average from 2007 to 2009) ranges between 33.5% and 36.0% of workers are coming into Marin to work for all the workers in Marin County.
6. The LEHD reports a range from 2007 to 2015 that is from 33.7 to 36.2 **if self-employment workers are added to the based LEHD payroll employment for total employment levels in Marin County.**
  - a. This close matching of the ACS data and LEHD data plus BEA suggests tracking self-employed workers is a key to tracking traffic patterns;
  - b. The assumption here is that self-employed workers are not “commuting” thus work where they live; and
  - c. The ACS total workplace geography estimate of workers for Marin County is similar to the QCEW figures for Marin County employers and the number of workers that work in Marin

County, suggesting major miscalculation of the total workers in Marin but a good estimate of the percentage of total workers commuting.

It is recommended that TAM consider using older data (as available) to provide a time series of trips to compare to governmental sources on commuting, as well as repeat the GPS, cell-phone exercise in the future.

## **References**

McKenzie, Brian (2013) "County-to-County Commuting Flows, 2006-10", accessed at <https://www.census.gov/library/working-papers/2013/acs/2013-McKenzie.html>

Graham, Matthew and Mark J. Kutzbach and Brian McKenzie (2014) "Design comparison of LODES and ACES commuting data products", accessed at <https://www2.census.gov/ces/wp/2014/CES-WP-14-38.pdf>

Green, Andrew S. and Mark J. Kutzbach and Lars Vilhuber (2017) "Two Perspectives on Commuting: A Comparison of Home to Work Flows Across Job-Linked Survey and Administrative Files", Accessed at <https://ideas.repec.org/p/cen/wpaper/17-34.html>

Fehr Peers (2018) "TAM Origin and Destination Report", provided by Transportation Authority of Marin, April 2018.

## *Data Sources:*

Bureau of Economic Analysis (2018) "Employment by County, Metro, and Other Areas", accessed at <https://www.bea.gov/data/employment/employment-county-metro-and-other-areas>

Bureau of Labor Statistics (2018) "Quarterly Census of Employment and Wages (QCEW)", accessed at <http://www.bls.gov/ces>

California Employment Development Department (2018) "Labor Market Information: QCEW", accessed at [https://www.labormarketinfo.edd.ca.gov/data/Quarterly\\_Census\\_of\\_Employment\\_and\\_Wages.html](https://www.labormarketinfo.edd.ca.gov/data/Quarterly_Census_of_Employment_and_Wages.html)

Census Bureau (2018) "American Community Survey", accessed at <http://factfinder.census.gov>

Census Bureau (2018) "Longitudinal Employer-Household Dynamics (LEHD)" accessed at <https://onthemap.ces.census.gov/>

Plan Bay Area data provided by TAM staff from Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC)



**From:** [Carolyn Longstreth](#)  
**To:** [housingelement](#)  
**Subject:** Draft Housing and Safety Element  
**Date:** Thursday, June 30, 2022 1:57:24 PM

---

Dear Housing Element Community Development Agency,

Dear County of Marin Planning Commission and Board of Supervisors,

I am writing today regarding the Draft Housing and Safety Element reports. For the last 50 years, the community has worked in partnership with the County to ensure that community planning (1) incorporates the theme of sustainable communities to protect sensitive coastal habitats; (2) reduces greenhouse gas impacts; and (3) encourages infill and redevelopment projects focused on underutilized development near transit and job centers.

The County is currently on track to rollback the foundational elements of the award-winning 2007 Countywide Plan and conservation zoning that has safeguarded Marin from sprawl and irresponsible development projects. Please uphold the legacy of sustainable community planning and development and consider the following priorities as this plan proceeds:

1. Marin's award-winning Countywide Plan must be honored, not rolled back. The environmental corridors should not be changed to promote urban sprawl.
2. Don't roll back A-60 zoning (one house per 60 acres of agricultural lands). This is a slippery slope! Except for the Buck Center site, exclude proposed A-60 sites from consideration for residential housing development.
3. Protect sensitive habitat areas and depleted water resources from irresponsible development. Development sites should be 100 feet away from a shoreline or creek, protecting riparian habitat and water quality.
4. Proposed housing locations must have adequate water supplies and wastewater infrastructure to reduce environmental harms. The housing units proposed for Balmoral Way in Inverness do not meet this criteria, as I and my neighbors have repeatedly pointed out.
5. Exclude locations in and near low-lying wetlands. These areas will be flooded due to rising sea levels in the coming decades.
6. Protect our residential communities with programs and policies that prioritize residential housing stock for the people who live and work in our communities.
7. Honor the Sustainable Communities Strategies of Plan Bay Area 2050. The County should promote infill near commercial cores, job centers, and transit centers, as well as promoting mixed-use commercial spaces.

Thank you for consideration of my comments,

Sincerely,  
Carolyn Longstreth  
PO Box 657



Inverness, CA 94937

**From:** [Jessica Taylor](#)  
**To:** [housingelement](#)  
**Subject:** Draft Housing and Safety Element  
**Date:** Wednesday, June 29, 2022 5:47:33 PM

---

Dear Housing Element Community Development Agency,

Dear County of Marin Planning Commission and Board of Supervisors,

I am writing today regarding the Draft Housing and Safety Element reports. For the last 50 years, the community has worked in partnership with the County to ensure community planning incorporates the theme of sustainable communities to protect sensitive coastal habitats; ensure resource availability; reduce greenhouse gas impacts; encourage infill and redevelopment projects to recolonize the asphalt with projects focused on underutilized development near transit and job centers. The County is currently on track to rollback the foundational elements of the award-winning 2007 Countywide Plan and conservation zoning that has safeguarded Marin from sprawl and irresponsible development projects. Please uphold the legacy of sustainable community planning and development and consider the below priorities as this plan proceeds:

1. Marin's award-winning Countywide Plan must be honored, not rolled back. The environmental corridors should not be changed to promote urban sprawl.
2. Don't roll back A-60 zoning (one house per 60 acres of agricultural lands). This is a slippery slope! Exclude the Buck Center site and other proposed A-60 sites from consideration for residential housing development.
3. Protect sensitive habitat areas and depleted water resources from irresponsible development. Development sites should be 100 feet away from a shoreline or creek, protecting riparian habitat and water quality.
4. Proposed housing locations must be near adequate water supplies and wastewater infrastructure to reduce environmental harms.
5. Exclude locations in and near low-lying wetlands. These areas will be flooded due to rising sea levels in the coming decades.
6. Protect our residential communities with programs and policies that prioritize residential housing stock for the people who live and work in our communities.
7. Honor the Sustainable Communities Strategies of Plan Bay Area 2050. The County should promote infill near commercial cores, job centers, and transit centers, as well as promoting mixed-use commercial spaces.

Thank you for consideration of my comments,

Sincerely,  
Jessica Taylor  
255 Aberdeen Way  
Inverness, CA 94937

**From:** [Bobbi Loeb](#)  
**To:** [housingelement](#)  
**Subject:** Draft Housing and Safety Element  
**Date:** Sunday, June 26, 2022 5:22:00 PM

---

Dear Housing Element Community Development Agency,

Dear County of Marin Planning Commission and Board of Supervisors,

I am writing today regarding the Draft Housing and Safety Element reports. For the last 50 years, the community has worked in partnership with the County to ensure community planning incorporates the theme of sustainable communities to protect sensitive coastal habitats; ensure resource availability; reduce greenhouse gas impacts; encourage infill and redevelopment projects to recolonize the asphalt with projects focused on underutilized development near transit and job centers. The County is currently on track to rollback the foundational elements of the award-winning 2007 Countywide Plan and conservation zoning that has safeguarded Marin from sprawl and irresponsible development projects. Please uphold the legacy of sustainable community planning and development and consider the below priorities as this plan proceeds:

1. Marin's award-winning Countywide Plan must be honored, not rolled back. The environmental corridors should not be changed to promote urban sprawl.
2. Don't roll back A-60 zoning (one house per 60 acres of agricultural lands). This is a slippery slope! Exclude the Buck Center site and other proposed A-60 sites from consideration for residential housing development.
3. Protect sensitive habitat areas and depleted water resources from irresponsible development. Development sites should be 100 feet away from a shoreline or creek, protecting riparian habitat and water quality.
4. Proposed housing locations must be near adequate water supplies and wastewater infrastructure to reduce environmental harms.
5. Exclude locations in and near low-lying wetlands. These areas will be flooded due to rising sea levels in the coming decades.
6. Protect our residential communities with programs and policies that prioritize residential housing stock for the people who live and work in our communities.
7. Honor the Sustainable Communities Strategies of Plan Bay Area 2050. The County should promote infill near commercial cores, job centers, and transit centers, as well as promoting mixed-use commercial spaces.

Thank you for consideration of my comments,

Sincerely,  
Bobbi Loeb  
PO Box 673  
Point Reyes Station, CA 94956



Saturday, June 25, 2022

## Draft Marin County Housing Element - Comment Form

The County of Marin is currently updating the Housing Element of the Countywide Plan (the County's General Plan) for the 2023-2031 period. Please fill out this form with any comments or suggestions. The public review period is June 1 through June 30. Comments will be accepted through June 30 at midnight.

### Name

ted von Glahn

### Community You Live In/Represent

Lucas Valley

**Please select the best way to reach you in case there are questions about your submission**

Email

### Email

tedvong@gmail.com

## Housing Element Section

**Please indicate the Housing Element section that your comment relates to. If you have general comments, indicate "General". Please provide a separate form submission for additional topics you may have.**

General

### Page Number

many

### Comment or Suggestion

Thanks for your consideration of my thoughts below. I've listed a set of draft Plan shortcomings and suggest ways to remedy these limitations. I may have missed some content in the Plan as it's a lot for a layperson to digest. But, if I misunderstood the Plan happy to be educated and thanks in advance. I'm supportive of this work but per my comments have my worries about the implementation. Ted von Glahn

1. Problem: The Plan is opaque regarding the likely number of units that could be built on each

of the proposed sites and the nature of developer concessions that would be permissible given SB35, AB1763 and the County 10% Density Bonus. The 80% affordable housing density bonus translates to huge increases in the number of units compared to the unit counts presented in the appendix.

Remedy: The Countywide Plan should include tables that list the number of units upper limit per the density bonus formula for each of the proposed sites and, via footnotes/other devices, indicate the types of developer concessions that are applicable and permissible per the mix of low income and other slated housing. And, the County should be explicit about its Plan assumptions (e.g. water capacity, etc.) regarding the uptake on the density bonus – presumably the County anticipates that the bonus density is needed for these sites to be financially feasible investments.

2. Problem: The implications of the various County developer incentives/concessions is unclear. As an example, there is no discussion of the typical scenarios in which higher building heights would be approved and the upper limit of such concessions. Similarly, the County proposes reducing the number of required off-site parking spaces but there is no discussion of the implications – if a two-adult household in a single bedroom unit is limited to one parking space, does that mean that the second adult would need to park their car on a nearby street? Given there is no mass transit serving many of these sites, 2 working adults, each with a car for work commuting, is a reasonable scenario.

Remedy: Explain the permitted developer incentive/concessions and the implications. As an example, it appears that the County is changing the building height limit to a 45-foot maximum to attract more developer interest. If so, does this maximum height allowance apply to any site? Is the expectation that this allowance typically would mean 3-story buildings or otherwise?

3. Problem: The Plan contains a number of developer fast track elements – ways that the County seeks to encourage developers to invest in local affordable housing. The County's concomitant responsibility to ensure Marin residents' other interests ranging from safety to quality of life are not addressed. The Plan lacks any details to educate and assure the reader that the County, or other entities serving the public, have the capacity to implement the related off-site improvements/mitigation elements whether it be road and traffic control, water and septic, schools and recreation, or wildfire safety. Notwithstanding

the Plan's statement that "this Housing Element introduces programs...to mitigate infrastructure constraints" here is no substantive discussion of such mitigation for a number of these critical topics (there are details for certain topics like water and public sewer services though some of the risks including likely long-term rainfall reductions are not vetted and the impact of higher build counts per the bonus density is unclear).

Remedy: Conduct site-specific assessments for at least the larger sites and for sites that could have greater impacts on neighboring areas or due to higher safety/other risks. As an example, it seems unthinkable to proceed with the St. Vincent site, with 2,400 units per the density bonus, which would well exceed the population of many smaller towns given there are no services/anything nearby except for the Hwy 101 ramp. The two sites at Mt. Lassen, with ~250 units per the density bonus, translates to ~12% increase in the local population – that would have a significant impact on road interchanges, traffic congestion, safety, etc.

4. Problem: The "infrastructure" component of this Plan is woefully incomplete. As examples:

Transportation: the Plan includes a brief inventory of Marin transportation but the Plan does not address the barriers faced by a number of the proposed sites per the distance to work and commercial/shopping districts, lack of public transit and sidewalks, and the congestion and travel time per the secondary, two-lane roads. The following Plan summary statement prompts an eyeroll as it is at odds with the actual list of proposed sites "The Countywide Plan and Inventory of Sites aims to address these conditions by facilitating development of higher density housing in areas which promote the minimization of vehicle miles travelled. These areas are typically in more urbanized locations with wider streets, close to city arterials and greater access to public transit systems."

Remedy At a minimum, explain steps that will be taken to measure and evaluate the increase in road use, congestion and travel time per the TAM traffic demand, vehicle miles traveled and other modelling tools. In turn, explain the transportation impact and mitigation requirements like traffic controls, roadway changes, safe routes to schools etc.

Emergency Access/Evacuation: the Plan states "For the Housing Element sites inventory, evacuation routes were considered as part of the site selection process any [sic] many of the larger sites have more than one access point. In addition the County's existing procedures described above and additional actions included in this element will help to minimize constraints between

environmental hazards and the sites included in the housing element inventory.” This element of the Plan gives short shrift to an issue that was among residents’ most commonly cited concerns as documented in the community input section. There is no other discussion of this issue be it “existing procedures” or otherwise in this Plan. Is the County saying “don’t worry it’s not a problem”... and no further analysis/mitigation will be considered?

west  
marin

environmental  
action  
committee



Tomales Design Review Board

Point Reyes Station  
Village Association



SIERRA  
CLUB

MARIN COUNTY GROUP



Resource Renewal Institute  
40 Years. Innovation for a Sustainable Future.



June 30, 2022

County of Marin  
Board of Supervisors  
Planning Commission  
Community Development Agency

*Submitted via email: [housingelement@marincounty.org](mailto:housingelement@marincounty.org), [BOS@marincounty.org](mailto:BOS@marincounty.org),  
[planningcommission@marincounty.org](mailto:planningcommission@marincounty.org), and [DRodoni@marincounty.org](mailto:DRodoni@marincounty.org)*

## **RE: Draft Housing and Safety Elements**

The under-signed organizations and individuals appreciate the opportunity to comment on the Draft Housing and Safety Element updates. These comments are focused on the proposed changes to the Countywide Plan (CWP) that would have long-term impacts to community-led sustainable planning.

## **Public Process and Inconsistencies with the Countywide Plan**

While we are grateful to the Community Development Agency (CDA) for the availability of online meetings and remote access to staff for questions, the planning process has been less than ideal, and in our opinion is one of the main reasons that there are proposed precedent-setting rollbacks to the County's environmental corridors and conservation zoning folded into the Draft Housing Element. This could have been avoided up front with ground-up in-person community planning.

Site selection by the CDA was driven by consultants, rather than the local communities. The CDA provided online tools and maps to collect data and potential site locations from the general public, but they failed to integrate those resources with the CWP that is the requirement to inform future physical development in



unincorporated Marin County. Decisions on future development flows first from the CWP's policies and guidance as has been upheld and strengthened by more than 40 years of case law.

It is our understanding from the June 14th public workshop that several coastal communities have not had the opportunity to fully review plans, understand the proposed CDA changes, or effectively coordinate community engagement and recommendations into this process. This is a major change in the manner in which the County of Marin has historically engaged with the community around development planning, especially when the CDA is proposing a significant revision to expand the City-Center Corridor and potentially change A-60 zoning on multiple parcels.

There is no legal requirement for the County to change the CWP environmental corridors and or A-60 zoning. Instead, the proposed changes seem to be based solely on the RHNA and the CDA's scramble for site selection to meet the allocation. If the Buck Center (and any other A-60 parcels remaining on the list) are removed from consideration, this will eliminate the need to amend the CWP environmental corridors, change A60 zoning, and uphold the will of the residents of Novato who voted to create an urban growth boundary.

The County of Marin has a storied history of responsive community planning to proactively and sustainably plan for development. This began with the community push back to the 1960s pro-development planning that would have paved over the lands we know today as the Point Reyes National Seashore, Golden Gate National Recreation Area, Marin County Parks and Open Space, Marin Municipal Water District Watershed, Gary Giacomini Open Space, and more than 136,000 acres of productive agricultural lands.

The 1970s community planning safeguarded the irreplaceable habitats and natural resources that sustain our human and natural environments. The 2007 update to the CWP was another example of collaborative community engagement and development resulting in an award-winning CWP that would protect sensitive coastal habitats; ensure resource availability; reduce greenhouse gas impacts; encourage infill and redevelopment projects to recolonize the asphalt with projects focused on underutilized development near transit and job centers.

Unfortunately, under pressure with the Regional Housing Needs Allocation (RHNA) timeline, the CDA departed from bottom-up community collaboration to top-down planning that undermines the goals of our CWP, disregards the time and effort of the public participating in the comprehensive CWP updates of the past, and reduces public confidence in community engagement and outreach.

## Requested Action

- We request the Planning Commission and Board of Supervisors uphold the current CWP and not approve any updates that are not specifically required by the State of California. This includes not making precedent-setting changes to expand the City-Center Corridor and also removing all A-60 agricultural zoning from site selection and rezoning plans.
- We request the Planning Commission and Board of Supervisors recommend the CDA conduct an update to the CWP in the coming years that will fully engage local community members and prioritize engagement with the unincorporated villages to update Community Plans to ensure consistency throughout documents and a community-led process.

Thank you for considering these comments.

Morgan Patton  
Executive Director  
Environmental Action Committee of West Marin (EAC)

Eric Morey  
Chair  
San Geronimo Valley Planning Group

Ken Levin  
President  
Point Reyes Station Village Association

Karen Anderson  
Resident  
Olema

Donna Clavaud  
Chair  
Tomaes Design Review Board

Kathleen Hartzell  
President  
Inverness Association

Chance Cutano  
Director of Programs  
Resource Renewal Institute

Judy Schriebman  
Chair Marin Group ExCom  
Sierra Club, Marin Group

Megan Isadore  
Executive Director  
River Otter Ecology Project

Laura Chariton  
Watershed Alliance of Marin

Preston Brown  
Director of Watershed Conservation  
Salmon Protection And Watershed Network (SPAWN)

Bridger Mitchell  
Resident  
Inverness

Robert Johnston  
Resident  
Inverness