

**SUSTAINABLE TAMALMONTE  
215 JULIA AVE.  
MILL VALLEY, CA 94941**

June 22, 2015

Marin County Board of Supervisors  
3501 Civic Center Dr., Rm. 329  
San Rafael, CA 94941

Re: Marin County Housing Element SEIR 2013

Dear Marin County Board of Supervisors,

The Superior Court recently set aside the Marin County Housing Element (HE) Supplemental Environmental Impact Report (SEIR) of 2013, pending additional traffic studies and analysis. We strongly urge you to continue to set aside this SEIR 2013 and not support any efforts to re-certify it.

We strongly opposed and continue to oppose the HE SEIR 2013. The document is severely flawed, as demonstrated by Environmental Attorneys Michael Graf, Rachael Koss, Kevin Haroff, Ed Yates, and Riley Hurd, among others and by technical experts and well-informed residents. There are many more deficiencies in the SEIR 2013 than just the lack of an adequate evaluation of traffic in Lucas Valley.

The HE SEIR 2013 evaluated an excessive number of potential housing sites (49 sites) that accommodated far more dwelling units (2192 dwelling units) than what were needed for the last or current Housing Element. (Please see the enclosed list of evaluated sites and units.) As such, if the SEIR 2013 were re-certified, then a needless number of sites would be subject to potential streamlining or exemption of the California Environmental Quality Act (CEQA).

Re-certification of the SEIR 2013 would allow developers to rely on the SEIR as a programmatic CEQA document to which the environmental review of future development projects may be tiered. Re-certification of the SEIR 2013 would confer what is essentially a CEQA free pass on future programmatic issues relating to cumulative impacts and alternatives.

If most of the sites evaluated by the SEIR 2013 would be developed, the cumulative adverse impacts on city and county infrastructure, services (including schools), traffic congestion, environment and public health and safety would be catastrophic. However, if the SEIR 2013 were re-certified, then potential

cumulative impacts resulting from proposed future development at these sites would not be further evaluated.

CEQA streamlining or exemption at the Tam Junction and Manzanita sites would be especially grievous due to the fact that these sites are subject to multiple constraints and hazards, including LOS “F” traffic congestion, excessive flooding, sea level rise, high air pollution, high seismic activity, subsidence, mud displacement, and proximity to vulnerable natural habitat and endangered species.

In addition, the County would have the option to add any of the sites, evaluated by the SEIR 2013, into the current 2015 to 2023 Housing Element, even though this is unnecessary.

Marin County has identified three sites in its current certified 2015 to 2023 Housing Element. These sites accommodate over 200% more housing units than required by law. Moreover, these sites were evaluated by the Countywide Plan’s EIR and do not need additional environmental review. Therefore, there is no need for the County to invest time, energy, or resources to pursue a new certified Housing Element SEIR for 49 sites that are not needed to comply with State Housing Law or Regional Housing Needs Allocation (RHNA) requirements.

We strongly urge you to continue to set aside the Marin County Housing Element Supplemental Environmental Impact Report 2013 and not support any efforts to re-certify it.

Thank you for your conscientious consideration.

Very truly yours,

/s/

Sharon Rushton

Chairperson

**Sustainable TamAlmonte**

Enclosure

**49 SITES & 2192 DWELLING UNITS EVALUATED BY THE MARIN COUNTY HOUSING ELEMENT SEIR 2013: All unit numbers are subject to up to 35% Density Bonus Increase**

**Connolly - District 1**

Marinwood Plaza - 85 units  
California Park - 50 units  
St Vincents/ Silvera - 221 units  
650 N San Pedro Road - 12 units  
Grady Ranch - 240 units  
Roosevelt Santa Venetia - 2 units  
Los Ranchitos - 60 units  
Big Rock Store Lucas Valley - 80 units  
Rotary Field Lucas Valley - 60 units  
Bail Bonds Santa Venetia - 44 units  
LDS Church Santa Venetia - 30 units  
McPhail School SV - 18 units  
San Pedro Road - 30 units  
Marin County Farmers Market – 18 units

**Total – 950 Units**

**Rice - District 2**

College of Marin – 45 units  
Kentfield SFD Eastbound - 60 units  
Kentfield SFD Westbound - 60 units  
Marin General Hospital - 50 units  
Ross Valley Storage - 45 units  
Sloat Garden Center Kentfield - 60 units  
Oak Manor - 10 units  
Sunnyside Nursery - 30 units

**Total – 360 Units**

**Sears - District 3**

Old Chevron Station - 21 units  
Manzanita - 3 units  
Armstrong Nursery - 53 units  
Around Manzanita - 45 units  
Tam Junction Retail - 60 units  
GG Seminary - 60 Units  
Strawberry Village – 30 units  
Strawberry Retail Reed Ave - 45 units  
Tiburon Blvd Eastbound - 43 units  
Tiburon Blvd Westbound - 30 units

Tiburon Redwood Highway - 81 units  
Easton Point - 43 units  
Oak Hill School, Marin City - 30 units  
Gateway Shopping Center - 150 units  
**Total – 694 Units**

**Kinsey - District 4**

Woodacre - 6 units  
Forest Knolls - 6 units  
Pt Reyes Grandi - 2 units  
Bear Valley Road - 5 units  
Olema Campground - 10 units  
Pt Reyes Feed - 27 units  
Pine Cone Diner - 4 units  
Pt Reyes North - 15 units  
Red Barn - 10 units  
Inverness - 21 units  
**Total - 101 Units**

**Arnold - District 5**

Tamarin Lane - 5 units  
Indian Valley - 5 units  
Atherton Ave - 80 units  
**Total - 90 Units**