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Dear Alex, Terry and Kristin,

It was great seeing you at the Gateway Planning Committee Meeting on Monday. Your input was very helpful. We especially appreciate your interest in hearing our views and hope you will take them under serious consideration as you reevaluate the Marin County Wide Plan Housing Overlay Designation (HOD), particularly in the Tamalpais Community Plan Area.

Let me commend you on the recent reduction of the Housing Overlay residential units in the Tam Valley and Almonte Districts. (Please let us know the specific parcels as well as the exact number of residential units that were removed from the Housing Overlay Designation (HOD) in our area.) This reduction is a great start. Yet, more needs to be done. The ADIC and I strongly urge you to continue with your removal efforts and eliminate the rest of the Housing Overlay Designation from our area.

My previous letter addressed to Supervisor McGlashan re: the Marin CWP Housing Overlay Designation (For reference, this letter is attached) presented strong reasons for our basic premise, which is: Due to the unique characteristics of our region and the fact that we have surpassed the capacity of our infrastructure, the Housing Overlay Designation should be removed, in its entirety, from the Tamalpais Community Plan Area. Furthermore, the existing allowable build out must be lowered. Below you will find further support for our case.

Basic Provisions of the Smart Growth Doctrine:

Basic provisions in "Smart Growth" doctrine prohibit placing the Housing Overlay Designation (HOD) in the Tamalpais Community Plan Area. According to the Berkeley Council of Neighborhood Association (CNA) website (www.berkeleycna.org): "One of the legal requirements for "smart growth" development is that the targeted area has adequate existing infrastructure capable of accommodating the additional population load expected by high-density transit oriented "smart growth"." Based on this criterion, Marin County Planning should not even consider the Hwy 1 corridor for the Housing Overlay Designation and high-density residential development. The area has far surpassed its traffic capacity. The infrastructure, particularly the roadway system, simply does not exist for any additional growth.

Making matters worse, factors emanating from outside our area will further burden our infrastructure. Many outside influences were listed in my letter to Supervisor McGlashan. The following supplements this list:

- Traffic has been exceptionally unbearable this warm summer. Numerous times the Hwy 1/ Stinson Beach exit was backed up to the middle of the Richardson Bay Bridge. (Please

view the attached photos which illustrate the extreme congestion we are dealing with.) With global warming, I believe we will continue to see more warm weather in our area and thus more days of high tourism and high traffic.

- Muir Woods states their yearly number of visitors have been down since 9/11. Yet, they still had 780,000 visitors in 2005. Once tourism resumes to normal, its tremendous burden on our infrastructure will become even more cumbersome.
- In addition to tourists and the City of Mill Valley's citizens, the Stinson Beach and Bolinas area residents also drive through our area to reach the freeway. Therefore, future growth in Stinson Beach & Bolinas must also be taken into account when evaluating the capacity of our infrastructure.

Another basic principal of "Smart Growth" is explained in the following quote from the Association of Bay Area Governments (ABAG): "**Scattering affordable housing helps check crime.** In areas comprised mostly of low-income housing – crime can be higher. Local governments can help blunt the effect of such concentrations of low-income housing in any one place by accommodating their share of the state's need for new affordable housing, by encouraging the development of affordable apartments and duplexes in scattered locations, and by approving mixed-income residential developments."

The Housing Overlay Designation (HOD) of the 2005 Draft Marin CWP violates both aspects of ABAG's principle. 1) Scattered Locations: Please look at the Housing Overlay Maps 3-2a and 3-2b of the 2005 Draft Marin CWP. Visually, one can see that affordable housing is concentrated in large pockets throughout the county. I.e. The close proximity of the selected Almonte and Tam Valley Housing Overlay Designation parcels (almost all within a few blocks of one another) constitutes a concentration of affordable housing rather than the preferred method of scattering them. 2) Mixed-income Residential Developments: The 2005 Draft Housing Overlay regulations encourage a developer to build an overly high percent of affordable housing because by doing so, the development can qualify for a higher unit/acre and FAR density as well as other development standard adjustments. On Page 3-18 of the 2005 Draft Marin CWP, section CD-2.de entitled "Implement the Housing Overlay Designation Program" requires developments to be geared to 50% very low income households or to 60% low income households in order to receive a density bonus and development perks. This is poor planning.

The term "mixed-income" does not carry a formal definition and has had different interpretations. In order to maintain a high standard of living, Marin's mixed-income residential development should include a somewhat equal number of 1) low to moderate income renters (for affordable units), 2) medium income renters (for medium range market rate units) and 3) high income renters (for high-end market rate units). The HOD's 50% to 60% affordable does not come close to representing a true mix of income levels. Moreover, witnessing numerous 100% affordable complexes in Marin, we suspect that a developer that is agreeable to building 50% to 60% affordable will actually end up developing a complex with an even higher affordable housing quotient. This is due to the affordable housing developer's mandate, the requirements of the affordable housing funding sources. Marin County's Inclusionary Requirement mandates 20% affordable residents. **20% affordable should not be exceeded.**

As advised on the ABAG website, the concentration of affordable housing and the unbalanced proportion of renter's income levels with 50% to 100% affordable may cause undue stress on the surrounding community and may breed crime. This is an unacceptable result. Moreover, the high density level promoted by the Density Bonus of the HOD is not compatible with our three-hazard-zone flatlands (liquefaction, seismic activity, and flood zones) nor with our communities' traditional and desired character.

Recommendations:

1. Remove the Housing Overlay Designation, in its entirety, from the Tamalpais Community Plan Area.
2. Focus on the reduction of existing traffic along the Hwy 1 corridor and the excessive congestion we experience today. Promote further development of public and non-motorized transportation.
3. Reduce the current allowable build-out to the greatest extent possible. When possible, it is in our best interest to prohibit development of vacant ridge-land and other environmentally sensitive parcels in our community. However, the growth should simply be eliminated. It shouldn't then be transferred to the lowland Housing Overlay Designation parcels. Population growth should not be encouraged in the Tamalpais Community Plan Area. Any new unit built, even if created in the "smart growth" design, still increases the number of car trips per day.
4. If "smart growth" is applied in the Tamalpais Community Plan Area, the goal should not be to reduce an increase in future traffic caused by allowable build out, but rather to not increase traffic at all beyond current levels.
5. Regarding Marin County in general: The two goals of 1) increasing Affordable Housing and 2) implementing "Smart Growth", rather than always being combined, should be pursued separately in such a way that they may or may not coincide. This would allow affordable housing to be fairly and evenly scattered throughout Marin County. In addition, it would reduce resistance to the "Smart Growth" concept.

Thank you in advance for your kind consideration and assistance.

Very truly yours,

Sharon Rushton
President
Almonte District Improvement Club
Enclosure
CC Supervisor Charles McGlashan
CC The Planning Commission