

February 26, 2007

Marin County Planning Commission
3501 Civic Center Drive, Room 308
San Rafael, CA 94903
Re: DEIR for the Marin County Wide Plan Update

Dear Marin County Planning Commissioners,

The Almonte District Improvement Club would like to make the following recommendations regarding the Marin County Wide Plan Update Draft Environmental Impact Report.

Mitigated Alternative 4 as it relates to Impact 4.1-5, Impact 4.2-3 and Impact 4.2-24

We would like to address the portion of Mitigated Alternative 4, which includes further refinements to the Housing Overlay Designation (HOD) than what is recommended in Mitigation Measure 4.1-5 for Impact 4.1-5 "Development of Residential Land Uses Incompatible with Established Land Use." Mitigated Alternative 4's refinements to the HOD also help to mitigate Impact 4.2-3 and Impact 4.2-24. These two impacts relate to land uses and development consistent with the Draft 2005 CWP which would result in significant project and cumulative traffic impact and an unacceptable Level of Service on State Route 1.

Although a step in the right direction, the ADIC and I conclude that Mitigated Alternative 4's further refinements to the Housing Overlay Designation do not provide enough relief to the Tamalpais Community Plan Area (Almonte, Tam Valley, Homestead, and Muir Woods Park). This is because it still provides for an additional allowable build out of 75 units in Tam Junction and 50 units at the Fireside Motel.

Mitigated Alternative 4 as it relates to Impact 4.1-5 "Development of Residential Land Uses Incompatible with Established Land Use"

Mitigated Alternative 4 allows an additional 75 units to be built on a 7 ½ acre site in Tam Junction. The 75 units added to the already allowed 150 units on the same acreage, results in a total allowable build out of 225 units on 7 ½ acres, equivalent to 30 units per acre. This is an extremely high density level. The soil conditions of the Tam Junction HOD site, which sits in the Tamalpais Valley lowlands, are that of landfill which used to be marsh. The result is a three hazard zone (a seismic activity zone, a liquefaction zone, and a flood zone). Homes built in the same soil have experienced severe sinking. Sewage pipes lying in the same soil have ruptured due to one side of the pipe sinking at a different pace than the rest of the pipe. These are similar conditions to the San Francisco Marina which suffered tremendously during the Loma Prieta Earthquake. The February 1st, 2007 Marin IJ article, entitled "Climate Change Threat" indicates that, due to global warming, tides will rise 3 feet over the next 50 to 100 years. Flooding in Almonte and Tam Valley is destined

to occur more frequently and rise to greater heights, until the entire Tamalpais Valley lowlands will be under water. Such hazardous conditions increase construction costs and the risk of building damage and personal injury. The perils of this location make it an inappropriate site to be targeted for high density development and a surge in population.

Suggested Additional Mitigations:

- 1) We suggest the following additions to “Criteria used in establishing the Housing Overlay Designation”:
“The area to be developed”:
 - Is not within a high or very high liquefaction zone
 - Is not within an area that due to projected impact of global warming is destined to be in a flood plain and ultimately under water

- 2) Instead of adopting the Housing Overlay Designation (HOD) of Mitigated Alternative 4 as delineated on Exhibit 5.0-16 (b), we recommend the removal of the Housing Overlay Designation, in its entirety, from the Tam Valley and Almonte Districts.

Mitigated Alternative 4 as it relates to Impact 4.2-3 and Impact 4.2-24: Land uses and development consistent with the Draft 2005 CWP would result in significant project and cumulative traffic impact and an unacceptable Level of Service (LOS) on State Route 1.

Mitigated Alternative 4’s refinements to the Housing Overlay Designation (HOD) do not provide sufficient mitigation for Impacts 4.2-3 and 4.2-24, which relate to significant project and cumulative traffic impacts and an unacceptable Level of Service on State Route 1 due to land use and development consistent with the Draft 2005 CWP. The Housing Overlay Designation (HOD) of Mitigated Alternative 4 still provides for an unacceptable additional allowable build out of 75 units in Tam Junction. The area’s infrastructure simply can not handle the additional strain of these units. In making our case we wish to help you understand the severity of the plight facing the communities that surround Hwy 1 as well as commuters who regularly use the highway. There is an intense cumulative impact destined to the area, which is described in the following paragraphs:

Under current conditions, Hwy 1 is the most congested Hwy in the county with a Level of Service “F”. (Please see the attached photos in order to visualize the current predicament.) There is no known feasible way to mitigate the congestion. Thus, the roadway infrastructure has already surpassed its capacity and the local communities already suffer from severe congestion.

Now add on the Hwy 1 traffic impact of future build-out already allowed by existing zoning regulations. This includes traffic generated by the future build-out of all jurisdictions which feed into Hwy 1. Existing zoning in the Tamalpais Community Plan Area (Tam Valley, Almonte, Homestead, and Muir Woods) already allows an additional 419 units to be built in the future. The City of Mill Valley’s zoning already allows another 900 to 1000 units to be built. We don’t have the figures, but one must also take in to account the additional build out already allowed in Stinson Beach, Olema, and Point Reys. The average Marin household consists of 2.35 people and generates approximately 11.3 car trips per day. All of these communities use Hwy 1 as their regular commuter route to get to the Freeway, Hwy 101.

One must also take note of the traffic that will be generated by the 50 units at the Fireside Motel, located at the most congested section of Hwy 1, which are now under construction.

Now add on the Hwy 1 traffic generated by tourism. In 2005, Muir Woods alone had 780,000 visitors. In 2006, this figure was higher due to many more warm weekends. Warm weather is a magnet for tourists visiting Muir Woods and other near by tourist destinations. This trend of increasing tourism is likely to continue as Global Warming brings to the area more and more warm summer days.

In addition, please remember the fact that Hwy 1 regularly floods. As previously mentioned, such flooding will occur more frequently and will rise to greater heights as the tides rise higher and higher due to global warming. (Please refer to the Marin IJ article of February 1, 2007, entitled "Climate Change Threat".) Flooding further exacerbates Hwy 1 congestion.

The above paragraphs describe what is already slated for Hwy 1 and the communities that surround it. Is it rational to increase the traffic burden even more? Yet, that is what the zoning changes of the Draft County Wide Plan will do.

Zoning changes of the Draft CWP call for relaxation of parking requirements. Yet Tam Valley and Almonte are at a current deficit in safe off-street parking. Residents, Patrons, Commuters, and Tourists (who park their cars all day to ride their bikes) all compete for a limited supply of parking spaces. Almonte's narrow streets, already taxed, are regularly crowded with parked cars, making passage unsafe. (Almonte had an incident in which an ambulance could not reach a resident in need because it could not pass by a parked SUV.) Commuters, who would like to use Public Transit, drive their cars to work instead because they can not find parking spaces near Manzanita and other bus stops. The result is illegal parking which clogs unsafe streets and adds to the congested condition.

If adopted, the "Land Use Categories" section of the Draft CWP also increases allowable density, which, among other things, would encourage an enormous population surge and thus more pedestrians and bicyclists. However, besides lacking roadway infrastructure, Tam Valley and Almonte are severely deficient in safe pedestrian and bicycle passage ways and thus would not be able to accommodate the increased demand. Unsafe pedestrian and bicycle usage of the streets would result. Of particular concern is that the proposed "Land Use Categories" section increases allowable residential units on parcels which sit on the East side of Hwy 1 (the marsh side), the side opposite to most local shops. Without appropriately spaced crosswalks, there is likelihood that the future residents will jay-walk across Hwy 1 to go shopping as well as to get to Bus Stops that lead south towards San Francisco. (Hwy 1 falls under the jurisdiction of Cal Trans. We understand that Cal Trans is not willing to place more crosswalks across Hwy 1 due to the curvature and slant of the road and because such crossings would further impede the congested traffic flow.) Such potential pedestrian mayhem will further complicate the untenable congestion.

On top of all these before mentioned factors contributing to the Hwy 1 corridor's dire congestion problem, Mitigated Alternative 4 then adds an additional allowable 75 units in Tam Junction to further aggravate the area's traffic. Such an escalation of the problem does not make sense, when it can be avoided.

Suggested Additional Mitigations:

Since Mitigated Alternative 4 does not provide sufficient mitigation for Impacts 4.2-3 and 4.2-24, we recommend the following additional mitigations:

1) We suggest the following addition to the "Criteria used in establishing the Housing Overlay Designation":

"The area to be developed":

- Does not generate traffic that feeds into a roadway with a Level of Service (LOS) greater than LOS "D".

2) We suggest that measures should be put in place to reduce future population growth and future development in areas which generate traffic that feeds into Hwy 1.

- This would include removal of the Housing Overlay Designation, in its entirety, from the Almonte and Tam Valley Districts.
- This would also include finding ways to reduce the number of additional residential units and additional commercial development already allowed by current zoning (1994 CWP) to be built in the Tamalpais Community Plan Area as well as in other jurisdictions where development contributes to Hwy 1 traffic. To accomplish this, we recommend that the residential density and Floor Area Ratio (FAR) of environmentally sensitive parcels located in the Tamalpais Community Plan Area and in other jurisdictions where development contributes to Hwy 1 traffic, be calculated at the low end of the applicable zoning designation. However, such units removed from environmentally sensitive sites should not then be transferred through a Housing Bank to other areas within the Tamalpais Community Plan Area and jurisdictions that contribute traffic to Hwy1, but instead should simply be removed. We further recommend that the number of residential units and the Floor Area Ratio (FAR) of "commercial/mixed use" parcels be calculated at the low end of the applicable zoning designation in the Tamalpais Community Plan Area as well as in other jurisdictions where development contributes to Hwy 1 traffic.

Thank you for your kind consideration.

Very truly yours,

Sharon Rushton
President
Almonte District Improvement Club
Enclosure

Cc: Marin County Board of Supervisors
Cc: Alex Hinds, Director of Marin County Community Development Agency