



THE TOWN OF
CORTE MADERA
MARIN COUNTY CALIFORNIA

300 TAMALPAIS DRIVE
CORTE MADERA, CA
94925-1418

www.ci.corte-madera.ca.us

TOWN MANAGER
TOWN COUNCIL
415-927-5050

TOWN CLERK
415-927-5086

FINANCE / BUS. LICENSE
415-927-5055

FIRE DEPARTMENT
415-927-5077

PLANNING / ZONING
415-927-5064

BUILDING INSPECTOR
415-927-5062

TOWN ENGINEER
PUBLIC WORKS
415-927-5057

RECREATION DEPARTMENT
415-927-5072

SANITARY DISTRICT NO. 2
415-927-5057

TWIN CITIES POLICE AUTHORITY
415-927-5150

October 14, 2016

Bay Area Metro Center
ATTN: Miriam Chion and Ken Kirkey
375 Beale Street Suite 800
San Francisco, CA 94105-2066

**Subject: Town of Corte Madera Comments on Plan Bay Area
2040 Draft Preferred Scenario**

Dear Ms. Chion and Mr. Kirkey:

Thank you for this opportunity to comment on the Draft Preferred Scenario for the 2017 update of Plan Bay Area 2040. The Town recognizes the challenge of projecting precisely where population and job growth will occur in the Bay Area over the long term, but believes it is critical to work closely with local staff and officials to ensure that your assumptions and the inputs used to determine future growth are based on the best and most accurate information available. This is particularly important when projections directly affect local development patterns and planning.

With this in mind, on October 4, 2016, the Town Council of the Town of Corte Madera reviewed a staff report, including the information in your August 30th letter, and September 15th and 29th emails, and discussed the household and job projections provided for our Town. The Town Council has directed the preparation of this letter and the comments that follow based on the information provided to the Town to date.

In general, we have serious concerns about the lack of information sharing and collaboration in the development of the Draft Preferred Scenario. It is difficult, if not impossible, to provide meaningful comments on the growth projections if we do not understand or cannot review the assumptions and inputs that are being used in their development. While staff has been able to obtain pieces of additional information, as discussed below, it is not clear how even this information is being used or if it is complete. It has also trickled in late in the comment process making it difficult to provide meaningful comment by the requested deadline.

Given that we are not certain what information and assumptions are being utilized in the projection process, it is important that growth projections are not in any way based on Corte Madera's land area, since approximately 43% of Corte Madera's total land area is either under water or protected marshlands.

The Town received two maps provided via the Transportation Authority of Marin (TAM) on October 4, 2016, titled, "Mill Valley and Corte Madera Maximum Allowable Commercial Density" (Map 1 attached) and "Mill Valley and Corte Madera Maximum Allowable Residential Density," (Map 2 attached) which we are told drive the UrbanSim model results. The following comments relate to these pieces of information:

- Map 1 appears to correctly assign FAR to parcels in Corte Madera based on the 2009 Corte Madera General Plan. However, the map should be revised to account for the following:

The map includes all public and private schools and government-owned and occupied properties in Corte Madera, including Neil Cummins public elementary school, the private schools of Marin Country Day and Marin Montessori, Corte Madera Public Library, California Department of Motor Vehicles, Marin Municipal Water District, and Town of Corte Madera government properties, such as our fire stations, Corporation Yard, and Town Hall. Based on the September 15, 2016 memo to City and County Planning Staff from MTC, under the heading "Prohibitions," "development is not allowed on *government-owned land*, parcels with long-term conservation easements, transportation/city infrastructure, water or wetlands, and parcels with very old/historic buildings [emphasis added]." Additionally, it should be noted that these properties are not commercially-designated properties, rather they are designated "Public/Semi-Public Facilities" in the Corte Madera General Plan. The map should be revised to remove the above-mentioned properties in Corte Madera and UrbanSim modelling should account for such revisions. This can be done by removing properties from the map that are designated "Public/Semi-Public" on Corte Madera's General Plan Land Use Diagram. We further note that similar properties in Mill Valley were not assigned FAR on this map.

- Maps 1 and 2, when read together, imply that the properties with Mixed-Use land use designations in the Corte Madera General Plan could be developed both at a maximum residential density *and* at a maximum commercial FAR. In certain instances, like Old Corte Madera Square, this is consistent with current zoning rules, however in large part, this is an unreasonable assumption to make and an incorrect interpretation of the Town's General Plan land use policies. For example, the impending adoption of the MX-1 Zoning District for Tamal Vista Boulevard will create new regulations that would set a maximum FAR for all uses on a parcel, meaning developing a site with the maximum allowable commercial FAR would preclude the development of the maximum allowable residential

density and vice versa (it should be noted that the maximum residential density would be 15.1 units/acre in this area as well). Furthermore, the vast majority of these "Mixed Use" areas are currently only zoned for commercial use, making commercial development more likely than residential.

At the very least, the maps should be revised to reflect that parcels within the Mixed-Use Commercial land use designation may be developed at either the maximum residential density *or* the maximum commercial density to more accurately reflect current Town policies. Given the current zoning regulations in place, the Town recommends placing all parcels in the Mixed Use Commercial land use designation (not in the MX-1 Zoning District) on Map 1, and remove them from Map 2.

- One of the last remaining sizable vacant parcels of land in Corte Madera, at 72 Industrial Way (approximately 5.0 acres), has recently been purchased by the Marin Audobon Society for the express purpose of restoring the land to protected marshland and habitat. This site currently has a General Plan designation for office space, but office development on this site is now entirely unrealistic. Map 1 should be revised to remove this site from Corte Madera's commercial land use inventory.

The Town received additional information related to the UrbanSim run that resulted in the Draft Preferred Scenario from TAM on October 7, 2016. The following comment relates to this piece of information:

- The UrbanSim run accessed at the following link: <http://mapcraftlabs.github.io/labs/r5080.html> indicates the development of 216 units at 195-205 Tamal Vista Boulevard. This site has been developed with 180 units and 3,000 square feet of commercial space. Therefore, the number of units projected to be developed at this location should be reduced by 36 units to 180.

Town staff had a phone conversation with ABAG staff on October 7, 2016 regarding household vacancy rates utilized in the UrbanSim run that resulted in the Preferred Scenario. The following comment relates to the information received in that communication:

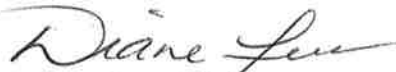
- It is our understanding that approximately 200 of the additional households projected in Corte Madera by 2040 result from decreased vacancy rates between 2010 and 2040 (from approximately 6% to 1% respectively). This is an important distinction that needs to be clearly explained to jurisdictions and the public so that household growth numbers are not confused with new units of housing created. We would like confirmation of the housing unit vacancy assumptions for Corte Madera used in the UrbanSim run and an explanation of how

household growth and new housing unit numbers would be affected if a more normal vacancy rate for 2040 is projected (i.e. would Corte Madera's household growth numbers be reduced or would new housing units increase).

Finally, while not directly related to the Plan Bay Area 2040 Draft Preferred Scenario, the Town believes it is important that MTC and ABAG, along with the Department of Housing and Community Development (HCD) begin the process of redefining what constitutes a housing unit. It is our understanding that certain types of housing for seniors for example (i.e. assisted living units without kitchens) do not qualify as a housing unit yet function as housing for our residents. This recognition and redefinition would more realistically represent the various ways in which jurisdictions accommodate household growth in the coming years.

We appreciate the opportunity to review and comment on the Draft Preferred Scenario and look forward to a response to our comments. Should you have any questions regarding the information in this letter please feel free to contact Adam Wolff, Director of Planning and Building, at (415) 927-5059 or email at awolff@tcmmail.org.

Sincerely,



Diane Furst, Vice-Mayor
Town of Corte Madera

cc: Town Council
Town Manager
Planning and Building Director
Planning Commission

MAP 1



Sources: Esri, DigitalGlobe, GeoEye, iSatellite, Earthstar, GeoEye, USDA, USGS, AEX, GeoEye, AeroGRID, IGN, IGR, swisstopo, and the GIS User Community Esri, HERE, DeLorme, TomTom, Intermap, Inc., © OpenStreetMap contributors, and the GIS user community

