

**Appendix A:
EIR Noticing and Public Involvement**

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A.1 - Notice of Preparation

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City of Sausalito
Notice of Preparation of a Program Environmental Impact Report
and Notice of Public Scoping Meeting
City of Sausalito General Plan Update

Date: October 16, 2019

To: State Clearinghouse; Responsible Agencies, Trustee Agencies, and other Interested Agencies, Parties, and Organizations

From: City of Sausalito, Community Development Department

Subject: Notice of Preparation of a Program Environmental Impact Report for the City of Sausalito General Plan Update and Notice of Public Scoping Meeting

NOTICE IS HEREBY GIVEN THAT The City of Sausalito (lead agency) will prepare a Program Environmental Impact Report (EIR) for the proposed City of Sausalito General Plan Update (proposed project). The Program EIR will address the environmental impacts associated with the adoption and implementation of the City of Sausalito General Plan Update. This Notice of Preparation (NOP) is being distributed to applicable responsible agencies, trustee agencies, and interested agencies, parties, and organizations as required by the California Environmental Quality Act (CEQA). Interested agencies are requested to comment on the scope and content of the significant environmental issues, mitigation measures (if needed), and reasonable alternatives to be explored in the Program EIR. Information regarding the project description, project location, public outreach process and topics to be addressed in the Program EIR is provided below.

30-DAY NOP COMMENT PERIOD: The City of Sausalito is soliciting comments from responsible agencies, trustee agencies, public agencies, organizations, and members of the public regarding the scope and content of the Program EIR, and the environmental issues and alternatives to be addressed in the Program EIR. In accordance with the time limits established by CEQA, the NOP public review period will begin on **October 17, 2019**, and end on **November 18, 2019**. Please provide your written/typed comments (including name, affiliation, telephone number, and contact information) to the address shown below by **5:00 p.m., Monday, November 18, 2019**. If you wish to be placed on the notification list for this project, or need additional information, please contact:

Bill Meeker, Planning Advisor
Community Development Department
City of Sausalito
420 Litho Street
Sausalito, CA 94965
Phone: 415.289.4137
Email: bmeeker@sausalito.gov

PUBLIC SCOPING MEETING: The City of Sausalito will hold a Scoping Meeting to: (1) inform the public and interested agencies about the proposed project; and (2) solicit public comment on the scope of the environmental issues to be addressed in the Program EIR, as well as the range of alternatives to be evaluated. The date, time, and place of the Scoping Meeting is as follows:

Monday, November 4, 2019
at 7:00 p.m.
City Hall Council Chambers
420 Litho Street
Sausalito, CA 94965

Regularly scheduled General Plan Advisory Committee (GPAC) Meetings have been held from June 20, 2017, to the present. Since October 2017, formal community workshops, pop-up workshops, and stakeholder meetings have been held to collect interested parties and the public's suggestions about a vision for Sausalito, City goals, land-use, preferred alternatives, and the draft General Plan Update. In addition, the City of Sausalito General Plan Update website provides the public with consistent project updates, project resources, and a space for public comments and questions.

PROJECT-RELATED DOCUMENTS: The City of Sausalito's existing General Plan documents and materials for the General Plan Update and Program EIR are available at:
<https://www.sausalitogeneralplan.org/>.

GENERAL PLAN UPDATE PROJECT BACKGROUND: Sausalito's current General Plan dates back to 1995. Since 1995, the Circulation Element was updated in 1999, the Housing Element was updated in 2015, and the Safety Element was updated in 2019. The General Plan Update commenced in 2017 and is expected to culminate in Fall 2020. The General Plan Update provides the opportunity to reexamine the General Plan and make updates to reflect the opportunities and challenges that have emerged. The outcome of this proposed project will be a user-friendly and coherent policy document that contains the vision for the City of Sausalito and the policies that will support the vision. The General Plan Update includes examining existing conditions, formulating a vision, establishing goals, identifying preferred alternatives, and preparing updates to the General Plan document.

PROJECT LOCATION AND DESCRIPTION: The project location and description of the proposed City of Sausalito General Plan Update follows.

SAUSALITO GENERAL PLAN UPDATE PROJECT

Project Location

The City of Sausalito is located in southern Marin County, California (Exhibit 1). The 2.1-square-mile City is nestled on the shores of the San Francisco Bay with a population of 7,421 people.¹ The City is bound by San Francisco Bay (Richardson Bay) to the east, Golden Gate National Recreation Area to the west and south, and Marin City to the northwest (Exhibit 2). Regional access to Sausalito is provided via Highway 101, as well as by passenger ferry service to and from San Francisco. The General Plan Planning Area is comprised of approximately 1,730 acres.

Project Description

The City of Sausalito General Plan Update (proposed project) is a focused effort to refine the Objectives, Policies, and Programs within the existing General Plan to help guide and shape the community over the next 20 years. The Sausalito General Plan Update seeks to preserve Sausalito's historic character, public open space, and natural resources, while enhancing public access to the waterfront and pedestrian and bicycle circulation. The proposed project also seeks to support a working waterfront.

The purpose of the proposed project is to bring the General Plan up-to-date and to reflect current regulations. The Marinship Specific Plan will be superseded with the adoption of the City of Sausalito General Plan Update. The General Plan Update will consider land use issues within City limits as well as immediately adjacent properties located within its Sphere of Influence (SOI). Sausalito's SOI has decreased since the 1995 General Plan was adopted and the accuracy of the current SOI will be verified through the General Plan Update process.

The State requires that the General Plan contain seven mandatory elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. The Sausalito General Plan Update will include all of the State-mandated elements, as described below:

- **The Land Use and Growth Management Element** describes the physical, economic, and population growth and development of the City of Sausalito. It establishes the goals, programs, and policies for development and growth regulation within the City's SOI. It includes standards and guidelines for land use development and controls to maintain the historic character and diversity of the community while allowing development.
- **The Circulation and Parking Element** addresses all transit styles and includes the goals, policies, and programs that guide the development and maintenance for a safe and efficient transportation system. This element emphasizes public transit, pedestrian and bicycle facilities, and parking and transportation management programs.
- **The Health and Safety Element** describes the natural and human activity-related hazards that exist in the City of Sausalito and presents guiding policies to protect people and property from

¹ California Department of Finance. 2018. Population Estimate for Cities, Counties, and the State January 1, 2018 and 2019.

natural or man-made hazards, prepare disaster plans, and prevent exposure to unacceptable noise levels. This element addresses geologic, seismic, flood, and fire hazards, as well as hazards created by human activity such as hazardous materials and waste and incidents that call for emergency response. In addition, this element provides measures to control and abate noise and to protect citizens from excessive noise exposure.

- **The Housing Element** identifies and analyzes existing and projected housing needs for safe and affordable housing in all economic segments of the community. It contains the plan and policies for the preservation, conservation, rehabilitation, and production of housing in the City of Sausalito. This element provides a detailed analysis of the City's demographic, economic, and housing characteristics as required by State law. The current Housing Element was adopted in 2015.
- **The Environmental Quality Element** provides the framework to conserve existing natural resources, preserve open space, and maintain and grow the recreation systems of the City of Sausalito. This element addresses protection of Sausalito's native vegetation, wildlife habitat, and conservation of open space, improvement to water and air quality, as well as conservation of water, energy, and reduction of solid waste. Recreation policies are included in this element to preserve and enhance current and future recreation opportunities.
- **The Economic Element** describes the goals, policies, and programs to regulate commercial development to desired rates and encourage healthy business relationships and activities in the City of Sausalito.
- **The Community Design and Historical Preservation Element** describes the policies and programs that intend to ensure Sausalito's evolution and diversity of design are harmonious with and reinforce the unique identity and delicate beauty of Sausalito.

The General Plan Land Use Map identifies land use designations for land within the City of Sausalito and the City's SOI. The proposed City of Sausalito General Plan Update Land Use Map is attached as Exhibit 3. Table 1 shows the approximate acreage for each land use designation for the City of Sausalito, including areas within the city limits and the SOI.

Table 1: Sausalito Land Use

Land Use Designation	City Limit (Acres)	Sphere of Influence (Acres)	Total (Acres)
Residential			
Very Low Density Residential	23.57	—	23.57
Low Density Residential	34.41	—	34.41
Medium Low Density Residential	135.92	—	135.92
Medium Density Residential	5.89	—	5.89
Medium High Density Residential	85.46	—	85.46
Planned Development Residential	3.79	—	3.79
High Density Residential	48.94	—	48.94
Arks	0.34	—	0.34
Houseboats	4.89	53	57.90
Total	343.21	53	396.22
Commercial/Industrial			
Mixed Residential & Commercial	7.29	—	7.29
Central Commercial	6.33	—	6.33
Neighborhood Commercial	5.56	—	5.56
Commercial Waterfront	9.43	—	9.43
Shopping Center	1.56	—	1.56
Industrial	65.43	—	65.43
Waterfront	107.94	—	107.94
General Commercial	—	1.01	1.01
Total	203.55	1.01	204.56
Public/Open Space			
Public Institutional	64.45	—	64.45
Public Parks	15.19	—	15.19
Open Area	142.73	645.33	788.06
Conservation	—	49.73	49.73
Open Space	211.78	—	211.78
Total	434.16	695.06	1,129.22
Gross Total	980.92	749.07	1,729.99
Source: M-Group General Plan Summary from GIS, prepared October 2019.			

Program Environmental Impact Report Analysis

The City of Sausalito, as the lead agency under CEQA, will prepare a Program EIR for the Sausalito General Plan Update in accordance with CEQA, implementing the CEQA Guidelines, relevant case law, and City procedures. The Sausalito General Plan Update is considered a “project” under CEQA, and is therefore subject to CEQA review. As a policy document, the General Plan provides guidance and sets standards for several areas of mandatory environmental review for later “projects” that would be undertaken by local government and the private sector.

The Program EIR will evaluate potential environmental impacts associated with adoption and implementation of the Sausalito General Plan Update. The Program EIR will disclose potential impacts of the General Plan Update, propose mitigation measures to avoid and/or reduce impacts deemed potentially significant, identify reasonable alternatives, and compare the environmental impacts of the alternatives to the proposed project’s impacts. Pursuant to Section 15063(a) of the CEQA Guidelines, no Initial Study will be prepared. The Program EIR will evaluate the full range of environmental issues contemplated under CEQA and the CEQA Guidelines, as described below:

- **Aesthetics**—This section will analyze potential impacts to aesthetics, including scenic vistas, scenic resources, visual character and quality, and light and glare within the Planning Area.
- **Air Quality**—An air quality analysis will be prepared in accordance Bay Area Air Quality Management District requirements. A discussion of the General Plan Update’s contribution to regional air quality impacts will be included.
- **Biological Resources**—This section will address direct and indirect impacts to regulated waterways and wetlands, sensitive habitats and mature native trees, sensitive plants and wildlife, and wildlife movement corridors.
- **Cultural Resources**—The Program EIR will examine potential adverse impacts the project would have on historical resources (or eligible historical resources), archaeological, paleontological, and tribal cultural resources.
- **Energy**—This section will include a discussion of the potential energy consumption and/or impacts from implementation of the General Plan Update, with an emphasis on avoiding or reducing inefficient, wasteful, or unnecessary consumption of energy.
- **Geology, Seismicity, and Mineral Resources**—This section will analyze potential geological, seismic, and mineral resource impacts from implementation of the General Plan Update.
- **Greenhouse Gas Emissions**—The Program EIR will analyze the General Plan Update’s contribution to greenhouse gas emissions and potential impacts to climate change.
- **Hazards and Hazardous Materials**—This section will discuss potential exposure to toxic substances resulting from activities within the Planning Area.
- **Hydrology and Water Quality**—The Program EIR will analyze impacts of the General Plan Update on drainage patterns and water quality within the Planning Area.

- **Land Use and Planning**—This section will summarize the City’s land use characteristics, including the overall land use pattern and determine the potential environmental effects of the proposed General Plan Update related to Land Use and Planning.
- **Noise**—This section will analyze short-term impacts to noise sensitive receptors and long-term noise exposure.
- **Population and Housing**—This section will examine existing and future development potential and growth impacts within the Planning Area.
- **Public Services**—The Program EIR will analyze impacts on public services, including police, fire and schools, from implementation of the General Plan Update.
- **Recreation**—The Program EIR will analyze the potential impacts on recreational and open space resources from implementation of the General Plan Update.
- **Traffic and Circulation**—The Program EIR will analyze the General Plan Update’s impacts on the circulation system, including vehicle miles traveled within the Planning Area, safe routes to school and all modes of transit.
- **Utilities**—This section will analyze the potential impacts associated with water supply, wastewater services, and other utilities and service systems.
- **Wildfire**—This section will analyze the potential impacts to wildfire risks, adopted emergency and evacuation plans, infrastructure, and land and drainage stability.

The Program EIR will also discuss the cumulative impacts of the project in combination with other closely related past, present, and reasonably foreseeable probable future projects in the vicinity. The Program EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the project that could reasonably accomplish most of the basic project objectives and could avoid or substantially lessen one or more of the significant impacts. The Program EIR will also analyze the “No Project Alternative” and will identify the environmentally superior alternative. The Program EIR will briefly describe and explain any alternatives that were eliminated from detailed consideration. The alternatives to be analyzed will be developed during the environmental review process and will consider input received during the public scoping process.

Purpose of this Notice

In accordance with CEQA Guidelines (14 California Code of Regulations [CCR] § 15082), the City has prepared this NOP to inform agencies and interested parties that a Program EIR will be prepared for the City of Sausalito’s General Plan Update. The purpose of an NOP is to provide sufficient information about the General Plan Update to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the Program EIR, including mitigation measures that should be considered and alternatives that should be addressed (CEQA Guidelines 14 CCR § 15082[b]).

Environmental Review Process

Following completion of the 30-day NOP public review period, the City will incorporate relevant information into the Draft Program EIR, including results of public scoping and technical studies. Subsequently, the Draft Program EIR will be circulated for public review and comment for a 45-day public review period.

The City requests that any potential Responsible or Trustee Agency responding to this notice do so in a manner consistent with CEQA Guidelines Section 15082(b). All parties that have submitted their names and email or mailing addresses will be notified throughout the CEQA review process.

A copy of the NOP (in full color) can be found on the project website at <https://www.sausalitogeneralplan.org> and on file at the City of Sausalito City Hall, Community Development Department, 420 Litho Street, Sausalito, CA 94965.

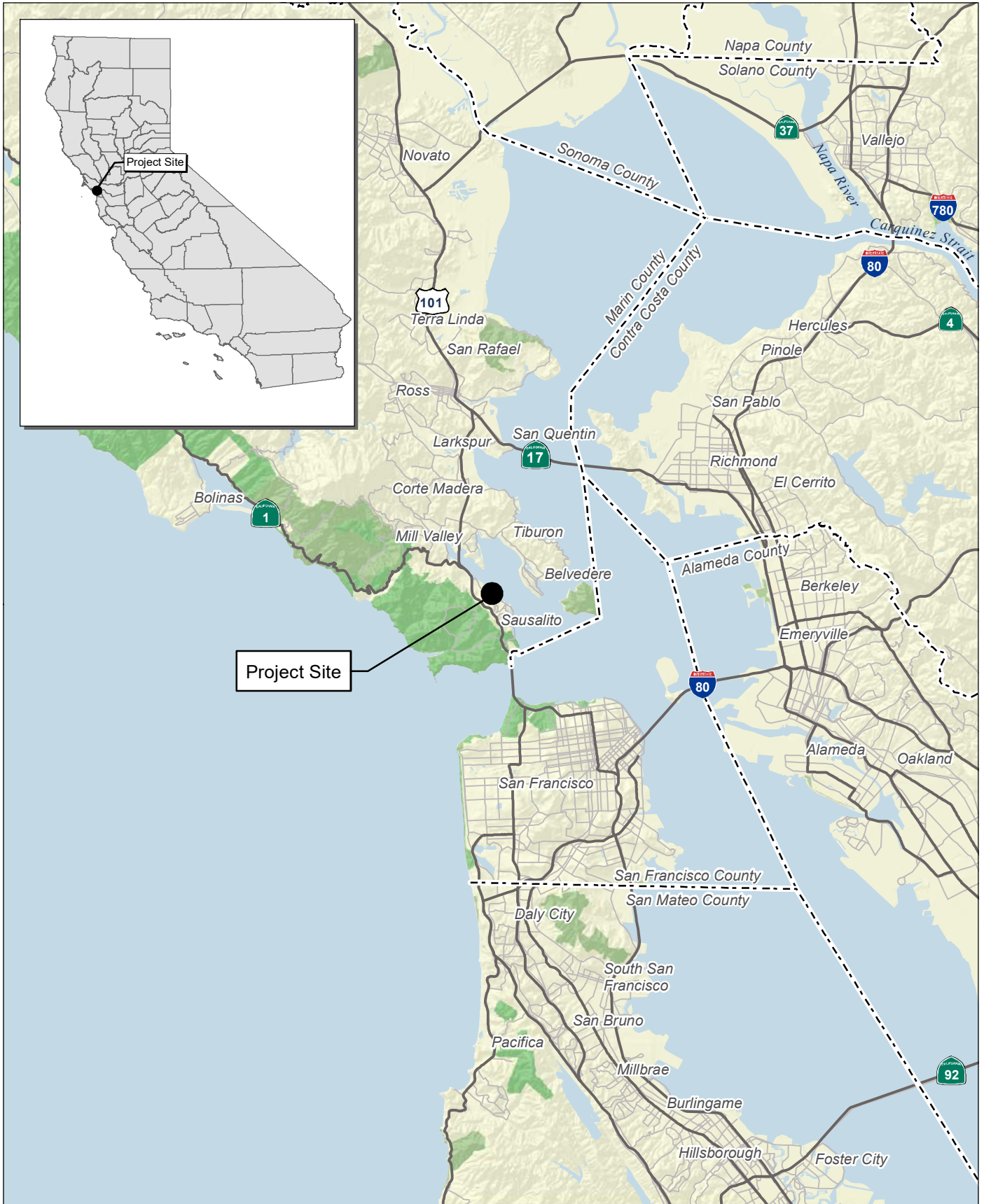
If you wish to be placed on the mailing list or need additional information, please contact Bill Meeker, Planning Advisor, Community Development Department, City of Sausalito, at 415.289.4137 or bmeeker@sausalito.gov.

Effects Found not to be Significant

Unless specific comments are received during the NOP public comment period that indicates a potential for the project to result in significant impacts, the following issues will be addressed in the Effects Found not to be Significant section of the Program EIR.

Agriculture and Forestry Resources

This section would analyze potential impacts resulting from conversion of agriculture and forest lands to non-agriculture and non-forest uses. Given the location of Sausalito in the urbanized context of the Bay Area, these resources are anticipated to not major considerations for the General Plan Update. Existing conditions and regulations will be summarized in this Program EIR.



Source: Census 2000 Data, The CaSIL

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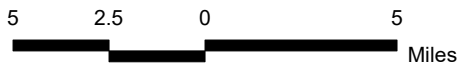
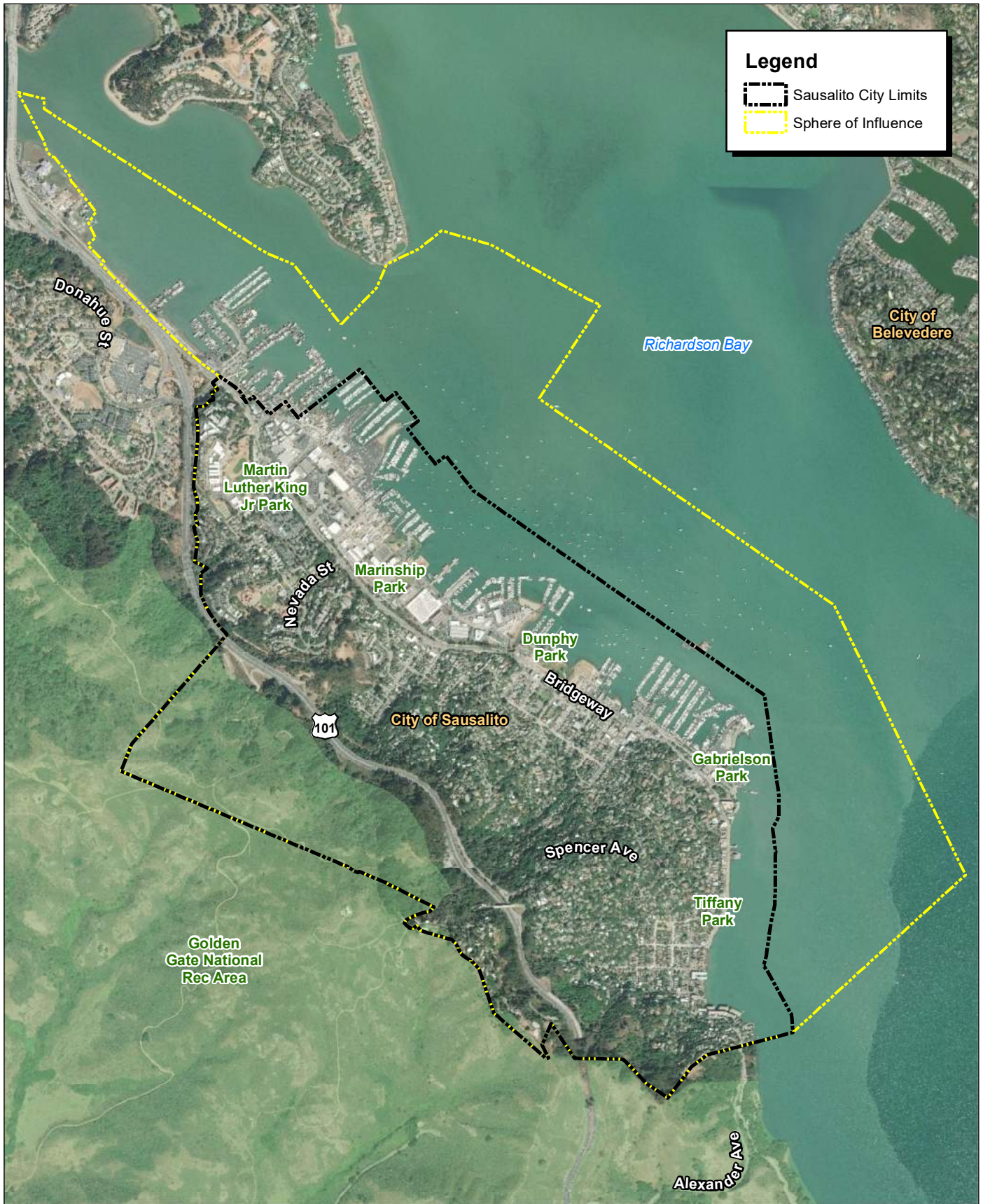
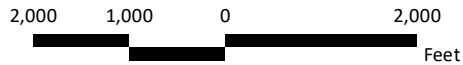


Exhibit 1 Regional Location Map

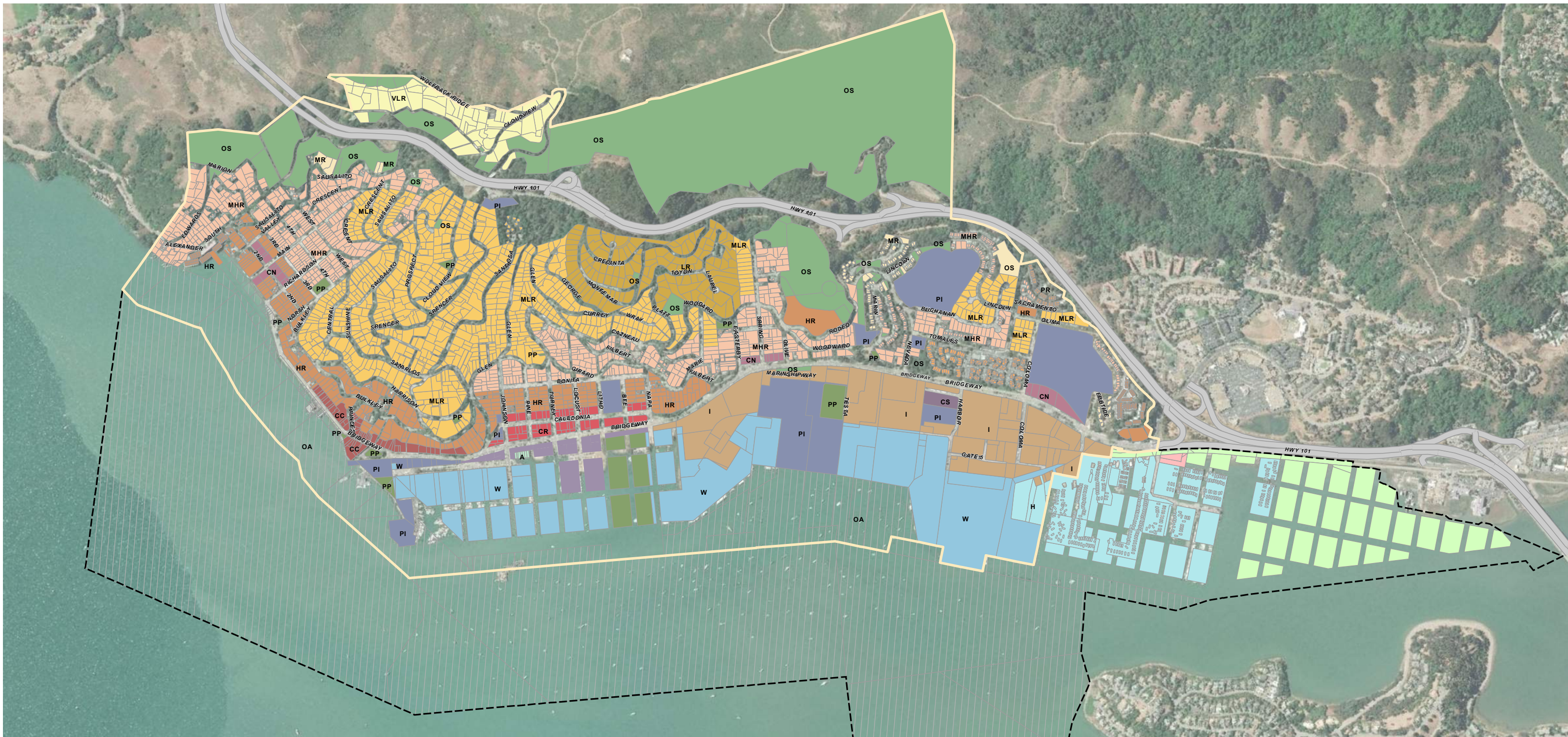
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Source: ESRI Aerial Imagery. Marin County GIS data.



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Land Use	Mixed Residential & Commercial (CR)	Planned Development Residential (PR)	Boundaries
General Plan Land Use	Arks (A)	Public Parks (PP)	City Boundary
Public Institutional (PI)	Houseboats (H)	Open Space (OS)	Sphere of Influence
Industrial (I)	Very Low Density Residential (VLR)	Open Area (OA)	
Waterfront (W)	Low Density Residential (LR)		
Central Commercial (CC)	Medium Low Density Residential (MLR)	SOI Land Uses	
Neighborhood Commercial (CN)	Medium Density Residential (MR)	General Commercial	
Shopping Center (CS)	Medium High Density Residential (MHR)	Conservation	
Commercial Waterfront (CW)	High Density Residential (HR)		



SAUSALITO GENERAL PLAN UPDATE
GENERAL PLAN LAND USE MAP



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A.2 - Summary of EIR Scoping Comments

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Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
State Agency				
San Francisco Bay Conservation and Development Commission (BCDC)	Clesi Bennett, Coastal Planner	11/04/2019	<ul style="list-style-type: none"> • States that projects within General Plan area and BCDC jurisdiction may require permits, and GPU and DEIR should acknowledge and describe BCDC’s jurisdiction and authority • States that DEIR should discuss whether General Plan elements would be consistent with San Francisco Bay Plan policies on: <ul style="list-style-type: none"> ○ transportation ○ public access and recreation ○ tidal marshes and flats ○ water quality ○ climate change and flooding • States that General Plan covers ocean waters and shoreline areas within the Richardson Bay Special Area Plan (RBSAP), and any projects proposed within this special area must be consistent with the RBSAP • States there are existing BCDC permits in General Plan area, and DEIR should discuss impacts that GPU would have on existing public access or other conditions required by these permits 	<ul style="list-style-type: none"> • Section 2, Project Description • Section 3.3, Biological Resources • Section 3.9, Hydrology and Water Quality • Section 3.13, Public Services and Recreation • Section 3.14, Transportation
State of California Department of Transportation (Caltrans) District 4	Mark Leong, District Branch Chief of Local Development – Intergovernmental Review	11/18/2019	<ul style="list-style-type: none"> • Requests a travel demand analysis that provides a VMT analysis and mitigation for significant impacts • States GPU should address multimodal impacts consistent with the Metropolitan Transportation Commission’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) • States GPU should include a Transportation Demand Management Program that would be documented with annual reports • States city should estimate costs for transit and active transportation improvements needed from buildout of the General Plan, and identify funding sources such as development and/or transportation impact fees • States city, as Lead Agency, is responsible for all project mitigation, including any improvements to the State Transportation Network 	<ul style="list-style-type: none"> • Section 3.14, Transportation
Golden Gate Bridge, Highway, and Transportation District	David Davenport, Senior Planner	12/09/2019	<ul style="list-style-type: none"> • Expresses enthusiasm to support city efforts and provide comments as necessary on environmental review 	<ul style="list-style-type: none"> • N/A

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
Individuals				
General Plan Advisory Committee (GPAC)	Peter Van Meter	10/29/2019	<ul style="list-style-type: none"> • Requests that EIR consider an alternative that allows office use (at a proper FAR) in selected portions of the Marinship 	<ul style="list-style-type: none"> • Section 4, Alternatives to the Proposed Project
--	Carlo Berg	11/26/2019	<ul style="list-style-type: none"> • Notes lack of elder memory care facilities in city and region • Expresses the desire to have senior uses on his subject property in the Marinship • Cites neighbor support for use of his property for senior uses • Encourages EIR to consider senior housing at the density per acre of an existing use, such as R-3 • Attached report on “Older Adult Housing in Marin” • Attached Age-Friendly Sausalito Questionnaire 	<ul style="list-style-type: none"> • Section 3.12, Population, Housing and Employment • Section 4, Alternatives to the Proposed Project
--	Tim Walch	12/02/2019	<ul style="list-style-type: none"> • Expresses need for more housing in City • Suggests mixed uses in commercial corridors, specifically residential with no/reduced parking • Suggests continuing to dedicate resources for safe bicycle traffic • Suggests creating a historic designation for qualifying buildings in Marinship to provide tax credits for rehabilitation • Suggests establishing non-automobile paths in Marinship • Suggests allowing senior housing and micro apartments with limited parking in Marinship 	<ul style="list-style-type: none"> • Section 3.12, Population, Housing and Employment • Section 3.14, Transportation
GPAC	Peter Van Meter	12/04/2019	<ul style="list-style-type: none"> • States that an expanded community plaza at ferry landing is being considered 	<ul style="list-style-type: none"> • Section 3.13, Public Services and Recreation

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
--	Tre Balchowsky	12/06/2019	<ul style="list-style-type: none"> • Asks how GPU will affect public transportation demand in City and surrounding region, and what will be done to offset any impacts to public transportation demand (e.g., ferry) from increased population in the city • Asks what municipal transportation departments will be involved in offsetting traffic increases with public transportation increase • Asks how increased traffic will be dealt with; notes speeding on Gate 5 Road is increasing and asks about safety • Asks how additional smog and toxins from increased vehicles will be abated • Asks how GPU will affect natural springs and wildlife that rely on them • Asks how native species will be affected/utilized in GPU • Asks how invasive species will be accounted for and mitigated • Asks how GPU will affect Mission blue butterfly, an endangered species • Notes city wastewater treatment plant experiences overflow and asks how it will adapt; also asks about cost of updating and increasing volume • Asks how power is provided and how it will be provided consistently • Asks how children are accounted for in GPU regarding school accessibility • Asks if renewable energy will be used 	<ul style="list-style-type: none"> • Section 3.2, Air Quality • Section 3.3, Biological Resources • Section 3.5, Energy • Section 3.13, Public Services and Recreation • Section 3.15, Utilities and Service Systems • Section 3.14, Transportation
--	Charles Kaufman	12/06/2019	<ul style="list-style-type: none"> • Asks how traffic increases will be addressed to ensure pedestrian safety and how GPU will enhance bike safety • Asks how GPU will address public transportation regarding accessibility • Asks what circulation changes will be made for safer streets and sidewalks • Asks how school transportation routes will be made safe and accessible • Asks how soil toxicity will be identified and addressed in shoreline and Marinship areas 	<ul style="list-style-type: none"> • Section 3.3, Biological Resources • Section 3.6, Geology, Soils, and Seismicity • Section 3.8, Hazards and Hazardous Materials • Section 3.13, Public Services and Recreation • Section 3.14, Transportation • Section 3.16, Wildfire

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Asks how General Plan will ensure emergency vehicle access to hillside areas • Asks what recreation will be identified and supported in GPU • Asks how public spaces will be protected from development • Asks how General Plan will protect natural streams and wildlife • Asks how bay waters will be protected from runoff and contamination • Asks how GPU will determine and address hillside stability • Asks how GPU will mitigate fire risk 	
--	Sonya Hammons	12/07/2019	<ul style="list-style-type: none"> • Requests information on public input process for GPU EIR process • Asks what mitigation will be required to address contamination in Marinship area • Asks what mitigation is necessary to address flood risk in Marinship area, and if flood risk poses a long term threat to residential development • Asks if floating/portable structures are being considered as an alternative to mitigate flood and earthquake risk • Asks about risks of siting residential and commercial uses near industrial, pointing to noise, air quality, and hazardous material, and asks how risks will be mitigated • Asks how liquefaction risk will be mitigated for new construction in Marinship area • Asks what mitigation is necessary for noise and hazardous materials impacts from light industrial uses on other uses • Asks how new land uses in Marinship area could be compatible with City sustainability planning • Asks how City is liable for property damage and health hazard associated with flood, earthquake, and contamination risk in Marinship area • Asks how housing and retail would be compatible with BCDC recommendations on not developing housing in areas vulnerable to sea level rise 	<ul style="list-style-type: none"> • Section 1, Introduction • Section 2, Project Description • Section 3.2, Air Quality • Section 3.6, Geology, Soils, and Seismicity • Section 3.8, Hazards and Hazardous Materials • Section 3.9, Hydrology and Water Quality • Section 3.11, Noise • Section 4, Alternatives to the Proposed Project

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Asks if there are other potential sites for residential and retail development other than Marinship, and if there will be a detailed analysis 	
Planning Commission; GPAC	Janelle Kellman	12/07/2019	<ul style="list-style-type: none"> • Asks why following agencies were not on NOP distribution list: <ul style="list-style-type: none"> ○ Environmental Protection Agency (EPA) (specifically Region IX) ○ California EPA (CalEPA) ○ Caltrans ○ United States Geological Survey (USGS) ○ Bureau of Indian Affairs ○ National Oceanic and Atmospheric Administration ○ California Air Resources Board (CARB) ○ Department of Water Resources ○ California Energy Commission / Public Utilities Commission (PUC) ○ California Coastal Conservancy • Asks if GPU raises federal air quality concerns • Asks if GPU raises historical resource concerns • Asks why US Fish and Wildlife Service are not being provided information to comment • States Federal Emergency Management Agency (FEMA) should be notified of GPU • Notes air quality analysis should be according to By Area Air Quality Management District (BAAQMD) CEQA Air Quality Handbook using California emissions Estimator Model (CalEEMOD) • Notes GPU should consider alternatives to reduce potential significant air quality impacts • Asks how GPU will accommodate CEQA alternatives analysis requirement • Notes BAAQMD should be a responsible agency for the project should it require a permit from them • Notes project should be evaluated for consistency with the 2016 RTP/SCS 	<ul style="list-style-type: none"> • Section 3.2, Air Quality • Section 3.4, Cultural and Tribal Cultural Resources • Section 3.6, Geology, Soils, and Seismicity • Section 3.8, Hazards and Hazardous Materials • Section 3.9, Hydrology and Water Quality • Section 3.10, Land Use and Planning • Section 3.14, Transportation • Section 3.15, Utilities and Service Systems • Section 4, Alternatives to the Proposed Project

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • States traffic patterns in peak and off-peak hours should be considered • States vehicle alternatives like water taxis should be in alternatives section • States impact of autonomous vehicles should be included • Notes project should evaluate potential impacts to wastewater and stormwater systems • Notes project should evaluate impacts to utility infrastructure • Notes project should be consistent with City of Sausalito Urban Runoff Pollution Prevention ordinance • States project should evaluate whether National Pollutant Discharge Elimination System (NPDES) permits will be required • Notes project should explain pending enforcement actions on water quality and present mitigation to avoid non-compliance • States project should inventory infrastructure needs to explain impacts and mitigation • States project should consider impacts of siting incompatible land uses • States project should identify contamination in city, including federal or private studies, and consider alternatives if found • States project should inventory historic landslides and support programs leading to a hillside ordinance • States project should consider alternate land use in Marinship for greater enforcement/restrictions so zoned industrial use is used as such • States economics studies conducted after conclusion of EIR should not be allowed to amend General Plan unless they receive full CEQA review • Asks how alternatives analysis will mitigate economic balance with community and quality of life • Supports historic protection policies in 1995 General Plan and state they should be retained 	

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Asks how Objective 4.0 of 1995 General Plan, Preserve the Character of Community Sub Areas, will be maintained in GPU • States a citywide inventory of city structures should be included as an objective of program in GPU • States land use section should include recommendation on senior housing in publicly owned spaces • States General Plan should address programs and policies for resilient and enhanced waterfront given sea level rise • Requests resilient land use policies that promote a sustainable community in alternatives analysis 	
GPAC	John DiRe	12/09/2019	<ul style="list-style-type: none"> • Asks if city will seek additional environmental review after General Plan is proposed to gather additional public comment • Asks about impacts of a seawall as potential sea-level rise mitigation • Asks about impacts of additional housing in city • Asks if check valves could help postpone sea-level rise and what their impacts are • Asks about impacts of eliminating natural gas for heat • Asks if increased traffic in Marinship would increase vehicle miles traveled in City • Asks about tree inventory in city, including invasives, and tradeoff between removal for fire safety and planting for aesthetics • Asks about importance of natural springs in Golden Gate National Recreation Area and how they will be affected by new development • Notes the Department of Fish and Wildlife should be involved in identifying endangered Mission blue butterflies in city open spaces • States mine tailings near natural springs may need investigation before circulation or development changes, and that the California Water Resources Control Board and Bureau of Land Management should provide input on concerns • Asks if/requests that the Federal Aviation Administration examine/propose guidelines on drone delivery and single-passenger taxi drones in the City • Asks if water taxis will be considered and what their biological impacts are 	<ul style="list-style-type: none"> • Section 3.3, Biological Resources • Section 3.4, Cultural and Tribal Cultural Resources • Section 3.5, Energy • Section 3.6, Geology, Soils, and Seismicity • Section 3.8, Hazards and Hazardous Materials • Section 3.9, Hydrology and Water Quality • Section 3.14, Transportation • Section 3.15, Utilities and Service Systems

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Asks if accelerated sea level rise post-2040 should be planned for or ignored • Notes that BCDC does not recommend residential development in areas vulnerable to sea level rise, and asks if city should ignore this; states that BCDC should provide input • Notes residential uses in Marinship/near hazardous sites/on landfills must comply with federal regulations, and that California Department of Insurance should provide input on potential problems • Requests San Francisco RWQCB be contacted regarding WWII-era soil contaminants at the Marinship • Requests Surface Transportation Board be contacted regarding projects requiring railroad track removal in Marinship • Requests the PUC, PG&E, and CARB be notified of increased land use/ development, and that increased demand on the City water treatment plant be determined • Requests the California State Historic Resource Commission and State Office of Historical Preservation be contacted regarding potential WWII-era cultural resources in Marinship • Requests a FEMA tsunami risk evaluation for all shoreline development, and a tsunami evacuation plan for all new residential development near the shoreline, particularly senior housing 	
--	Craig Merrilees	12/09/2019	<ul style="list-style-type: none"> • Asks if city is prepared to evaluate additional vehicle trip impacts if Marinship is up-zoned for housing and more commercial/retail uses. • Asks if city will evaluate increased traffic impact on air pollution, including sensitive receptors, especially during tourist season and rush hours on major routes like Bridgeway • Asks if city will account for fuel inefficient vehicles with a weighted average favored by drivers who might occupy potential residences in Marinship area 	<ul style="list-style-type: none"> • Section 3.2, Air Quality • Section 3.14, Transportation
GPAC	William Arno Werner	12/09/2019	<ul style="list-style-type: none"> • Expresses concern over not having a draft General Plan or summary of elements at time of NOP release • States probable environmental project impacts were not listed in NOP • Asserts that Marinship Specific Plan cannot be retired or superseded by the GPU 	<ul style="list-style-type: none"> • Section 3.2, Air Quality • Section 3.3, Biological Resources • Section 3.4, Cultural and Tribal Cultural Resources

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Notes City Ordinance 1022 was adopted prior to Marinship Specific Plan and can only be “superseded” by an election • Requests alternatives analysis of Marinship Specific Plan under: continued enforcement, incorporation into the GPU, and abandonment • Requests land use analysis of area of Richardson Bay within City’s Sphere of Influence • Requests including climate change in land use analysis • Requests including flooding/sea level rise and waterfront housing in land use and housing analyses • Requests including flooding and associated hazardous materials movement in land use analysis • Requests land use analysis of short term rentals • Requests economic and environmental impact examination in land use analysis of expanding City Sphere of Influence to annex Marin City • Requests history and potential impact examination of City Ordinance 1022 and 1128 in land use and transportation analyses • Requests analysis of waterborne transportation in Richardson Bay within City’s Sphere of Influence • Requests transportation analysis of short term rentals and their impact on emergency access • Requests evaluation of “anchor-outs” in Richardson Bay within City’s Sphere of Influence • Requests the Housing Element be consistent with the rest of the GPU • Requests biological and water quality analysis, including oyster farming and anchor-outs, of area of Richardson Bay within City’s Sphere of Influence • Requests consistency with ecological goals included in such plans as Marin County BayWAVE and Marin Climate Action Plan • Requests evaluation of waterfront economy • Requests assessment of CEQA Guidelines Section 15131(b) and (c) • Requests examination of cost management • Requests tribal cultural resources analysis 	<ul style="list-style-type: none"> • Section 3.7, Greenhouse Gas Emissions • Section 3.9, Hydrology and Water Quality • Section 3.14, Transportation • Section 4, Alternatives to the Proposed Project

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
Individuals (Verbal Comments Received During EIR Scoping Meeting)				
--	Carlo Berg	11/04/2019	<ul style="list-style-type: none"> • Requested an evaluation of different land uses at Marinship based on CEQA • Noted lack of senior mental care facilities in Sausalito area • Noted Age Friendly Sausalito Committee reported large increases in older adult population • Commended Kellman for identifying office vacancy rate in Marinship • Requested land use, need, and supply and demand be considered in the GPU and General Plan EIR • Noted large unmet demand for senior housing • Recommended consideration of beneficial uses that would not displace uses important to the community • Recommended methods of land use consideration being 1) analyze existing development density or (2) analyze existing zoning in residential areas with added overlays for senior/ affordable housing 	<ul style="list-style-type: none"> • Section 3.10, Land Use and Planning • Section 4, Alternatives to the Proposed Project
Mudslide Task Force; City Disaster Preparedness Committee	Sandra Bushmaker	11/04/2019	<ul style="list-style-type: none"> • Asserted NOP was released to general public without adequate time to allow for comment • Noted City of Novato’s GPU EIR NOP process • Requested more structure for public to comment on at NOP stage, such as General Plan revisions, or proposed policies and programs • Noted Marinship Specific Plan of 1985 should have been included in GPU EIR NOP • Noted the GPAC has been unable to review or comment on Marinship Specific Plan • Requested additional environmental topics in EIR, including toxicity, sea level rise, and subsidence • Requested review of zoning at the Marinship, as existing land uses do not fit current zoning • Requested more substance in NOP particularly on Downtown and other areas such as Caledonia Street • Noted City of Novato published suggested GPU policies 14 months previous to release of the EIR NOP 	<ul style="list-style-type: none"> • Section 3.8 Hazards and Hazardous Materials • Section 3.6, Geology, Soils, and Seismicity • Section 3.8, Hazards and Hazardous Materials • Section 3.9, Hydrology and Water Quality • Section 3.15, Utilities and Service Systems

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Noted that current GPU process feels like it is being fast tracked and would like to know why • Asked what the next step for FCS is to address objections to the EIR process raised at the scoping meeting 	
GPAC	John DiRe	11/04/2019	<ul style="list-style-type: none"> • Requested alternatives analysis include study of impacts in Marinship of increasing regulatory restrictions and enforcements to reduce existing, out of zoning office space, and encourage industrial use • Requested consideration of long term vacancy rate of office and industrial uses in Marinship • Requested additional topics for environmental review including historical significance, subsidence and soil contamination, and past and future enforcement mechanisms of City zoning regulations • Noted the community does not want a sea wall to mitigate sea level rise 	<ul style="list-style-type: none"> • Section 3.4, Cultural and Tribal Cultural Resources • Section 3.6, Geology, Soils, and Seismicity • Section 3.8, Hazards and Hazardous Materials • Section 4, Alternatives to the Proposed Project
—	Tom Hoover	11/04/2019	<ul style="list-style-type: none"> • Requested Marinship be included in GPU and General Plan EIR • Requested analysis of assisted/senior housing in the EIR and parameters to protect Marinship from overdevelopment • Noted Marinship is not only area in city out of compliance with zoning; referenced Caledonia Street and Downtown areas • Seconded comments of Bushmaker, Smith, and Van Meter • Noted that the U.S. Coast Guard should be an agency notified of NOP 	<ul style="list-style-type: none"> • Section 2, Project Description • Section 4, Alternatives to the Proposed
Planning Commission; GPAC	Janelle Kellman	11/04/2019	<ul style="list-style-type: none"> • Seconded Bushmaker comment on City of Novato and noted other nearby Cities with recent GPUs that provided materials to public agencies and general public on a better schedule • Noted that NOP is premature; points to CEQA Guidelines Section 15082 defining purpose of scoping process • Seconded Zuch comment (referred to Nichols) on erroneous statement in NOP • Noted project description is not specific enough for comment to be made • Expressed confusion about several public agencies left off list of public agencies notified of NOP 	<ul style="list-style-type: none"> • Section 2, Project Description • Section 3.6, Geology, Soils, and Seismicity • Section 3.9, Hydrology and Water Quality • Section 4, Alternatives to the Proposed Project

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Requested an inventory of resources be discussed in Hydrology and Water Quality Section • Requested historic landslide areas be discussed in Geology, Seismicity, and Mineral Resources Section, and potential to adopt hillside ordinance be analyzed • Opposed segmenting Marinship into three areas to avoid piecemealing • Requested alternatives analysis of retiring Marinship Specific Plan • Noted that opening Marinship to senior housing opens area to housing in general, and that this should be analyzed in alternatives analysis • Noted that including affordable housing at Marinship would require analysis of concessions and use intensification under State density bonuses • Requested the EIR explore placing housing in existing city owned property, and that this be explored as alternative to housing in Marinship • Requested that alternatives analysis consider office use in Marinship and their 20% vacancy rate; added that office use is not generally a permitted use at Marinship and the area's resources are not being protected 	
—	Adam Krivatsy	11/04/2019	<ul style="list-style-type: none"> • Advised the scoping meeting be treated as a scoping meeting and not a time to determine subjects for analysis; urged the meeting be used to determine approach • Commended decision to begin planning process and environmental analysis early • Urged provision of alternatives and consideration of those presented at the meeting, and complete alternatives analysis • Welcomed FCS's participation in the GPU and urged FCS to provide information as soon as possible 	<ul style="list-style-type: none"> • Section 4, Alternatives to the Proposed Project
—	Vicki Nichols	11/04/2019	<ul style="list-style-type: none"> • Asked whether California Department of Finance is standard source for population estimates • Requested all EIR topics be included with exception of Agriculture and Forestry Resources 	<ul style="list-style-type: none"> • Section 3.12, Population, Housing, and Employment

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
Commission on Aging; Age Friendly Sausalito Task Force; Board of Sausalito Village; Call a Ride for Sausalito Seniors	Tricia Smith	11/04/2019	<ul style="list-style-type: none"> • Requested exchanging office space for senior and affordable housing and facilities in Marinship 	<ul style="list-style-type: none"> • Section 4, Alternatives to the Proposed Project
GPAC	Peter Van Meter	11/04/2019	<ul style="list-style-type: none"> • Requested consideration of land use alternatives at industrial district of Marinship, namely for office space • Requested recognition of how modern business operates in Marinship • Requested consideration of financial ramifications of re-introducing office uses in Marinship • Requested consideration of adaptation of uses in Marinship • Noted Marinship is an important tax base contributor to City and must be considered as support for public services and resident quality of life • Noted that alternatives are informative and not final determinations • Urged waterfront use be a permitted use in the EIR 	<ul style="list-style-type: none"> • Section 2, Project Description • Section 4, Alternatives to the Proposed Project
GPAC	William Werner	11/04/2019	<ul style="list-style-type: none"> • Objected to process of CEQA requirement implementation • Seconded comments on nearby Cities' publishing GPU information in advance of EIR NOP • Speculated that GPU and General Plan EIR are being fast tracked for completion prior to 2020 elections • Reminded room that CEQA states it should not be a post hoc rationalization of decisions already made, and that in this case there is not adequate time to conduct studies for the EIR to consider all options • Referred to CEQA Guidelines Section 15004, emphasizing environmental review should not occur until it would produce meaningful information • Asked whether new and changed General Plan elements must be related to the newly reviewed Housing Element • Noted Marinship Specific Plan is also a CEQA document and should not be abandoned without understanding environmental consequences of doing so 	<ul style="list-style-type: none"> • Section 2, Project Description • Section 4, Alternatives to the Proposed Project

Summary of Sausalito General Plan EIR Scoping Comments

Agency/Organization	Author	Date	Comment Summary	Coverage in Draft EIR
			<ul style="list-style-type: none"> • Noted public agencies that should be notified of NOP that have not been identified insofar • Referred to Government Code Section 65300.5 stating one General Plan element cannot be given precedence over others 	
GPAC	Pat Zuch	11/04/2019	<ul style="list-style-type: none"> • Seconded Bushmaker comment that there is not an EIR or GPU vision to comment on at time of meeting • Noted EIR NOP erroneously states that Marinship Specific Plan will be superseded by the GPU and that this was not put to a vote by City Council • Noted no one but City Council is aware of what is in the Marinship Specific Plan and what of it will be included in the GPU • Asked why local public service agencies were not included in list of public agencies notified of NOP 	<ul style="list-style-type: none"> • Section 2, Project Description
Source: Compiled by FCS, 2020				

A.3 - EIR Scoping Comments

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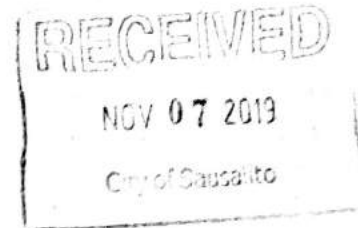
San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510, San Francisco, California 94105 tel 415 352 3600 fax 888 348 5190

State of California | Gavin Newsom – Governor | info@bcdc.ca.gov | www.bcdc.ca.gov

November 4, 2019

Lilly Whalen
City of Sausalito
420 Litho Street
Sausalito, CA 94965



SUBJECT: Notice of Preparation for the Sausalito General Plan Update Draft Environmental Impact Report, SCH #2019100322

Dear Ms. Whalen:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Sausalito General Plan Update Draft Environmental Impact Report (DEIR), dated October 16, 2019 and received in our office on October 21, 2019. The Commission has not reviewed the NOP, however the following staff comments are based on staff review of the NOP for consistency with the McAteer-Petris Act and the policies of the *San Francisco Bay Plan* (Bay Plan).

Jurisdiction and Authority. BCDC is responsible for granting or denying permits for any proposed fill (earth or any other substance or material, including pilings or structures placed on pilings, and floating structures moored for extended periods of time); extraction of materials; or change in use of any water, land, or structure within the Commission's jurisdiction. Generally, BCDC's jurisdiction over San Francisco Bay extends from the Golden Gate to the confluence of the San Joaquin and Sacramento Rivers and includes tidal areas up to mean high tide, including all sloughs, and in marshlands up to five feet above mean sea level; a shoreline band consisting of territory located between the shoreline of the Bay and 100 feet landward and parallel to the shoreline; salt ponds; managed wetlands; and certain waterways tributary to the Bay. The Commission can grant a permit for a project if it finds that the project is either (1) necessary to the health, safety, and welfare of the public in the entire Bay Area, or (2) is consistent with the provisions of the McAteer-Petris Act and the Bay Plan. The Commission has jurisdiction over the Bay waters and shoreline areas covered by the Sausalito General Plan. For projects within the General Plan area that are within the Commission's jurisdiction, permits may be required, depending on the nature of the activity. The General Plan Update and the DEIR should acknowledge and describe the Commission's jurisdiction and permit authority.

Transportation. The Bay Plan policies on Transportation state, in part, that "Transportation projects...should include pedestrian and bicycle paths that will either be a part of the Bay Trail or connect to the Bay Trail with other regional and community trails." The NOP mentions that the Circulation and Parking Element will be updated and will emphasize pedestrian and bicycle facilities. The DEIR should discuss whether the General Plan elements would be consistent with the Bay Plan policies on Transportation, including the Bay Trail.



Public Access. Section 66602 of the McAtteer-Petris Act states, in part, that “existing public access to the shoreline and waters of the San Francisco Bay is inadequate.” The Commission can only approve a project within its jurisdiction if it provides maximum feasible public access, consistent with the project. The Bay Plan policies on Public Access state, in part, that “in addition to the public access to the Bay provided by waterfront parks, beaches, marinas, and fishing piers, maximum feasible access to and along the waterfront and on any permitted fills should be provided in and through every new development in the Bay or on the shoreline... Whenever public access to the Bay is provided as a condition of development, on fill or on the shoreline, the access should be permanently guaranteed.” The DEIR should discuss whether the General Plan elements would be consistent with the Bay Plan policies on Public Access.

Recreation. The Bay Plan policies on Recreation state, in part, that “Diverse and accessible water-oriented recreational facilities, such as a marinas, launch ramps, beaches, and fishing piers, should be provided to meet the needs of a growing and diversifying population, and should be well distributed around the Bay and improved to accommodate a broad range of water-oriented recreational activities for people of all races, cultures, ages, and income levels.” The NOP mentions that recreation policies will be included in the Environmental Quality Element of the General Plan. The DEIR should discuss whether the General Plan elements would be consistent with the Bay Plan policies on Recreation.

Tidal Marshes and Tidal Flats. The Bay Plan policies on Tidal Marshes and Tidal Flats state, in part, that these resources “should be conserved to the fullest possible extent. Filling, diking, and dredging projects that would substantially harm tidal marshes or tidal flats should be allowed only for purposes that provide substantial public benefits and only if there is no feasible alternative.” The NOP mentions that conservation of existing natural resources will be included in the update of the Environmental Quality Element. The DEIR should discuss whether the General Plan elements would be consistent with the Bay Plan policies on Tidal Marshes and Tidal Flats.

Water Quality. The Bay Plan policies on Water Quality state, in part, that “Bay water pollution should be prevented to the greatest extent feasible,” and that “New projects should be sited, designed, and constructed and maintained to prevent...or minimize the discharge of pollutants into the Bay...” The NOP mentions that improvement of water quality will be discussed in the Environmental Quality Element of the General Plan. The DEIR should discuss whether the General Plan elements would be consistent with the Bay Plan policies on Water Quality.

Climate Change and Flooding. The Bay Plan policies on Climate Change state, in part, that “When planning shoreline areas or designing larger shoreline projects, a risk assessment should be prepared by a qualified engineer and should be based on the estimated 100-year flood elevation that takes into account the best estimates of future sea level rise...” and “To protect public safety and ecosystem services, within areas that a risk assessment determines are vulnerable to future shoreline flooding that threatens public safety, all projects—other than repairs to existing facilities, small projects that do not increase risks to public safety, interim projects and infill projects within existing urbanized areas—should be designed to be resilient

to a mid-century sea level rise projection. If it is likely the project will remain in place longer than mid-century, an adaptive management plan should be developed to address the long-term impacts that will arise based on a risk assessment using the best available science-based projection for sea level rise at the end of the century." Related Bay Plan policies on Safety of Fills state, in part, that "New projects on fill or near the shoreline should either be set back from the edge of the shore so that the project will not be subject to dynamic wave energy, be built so the bottom floor level of structures will be above the 100-year flood elevation that takes future sea level rise into account for the expected life of the project, be specifically designed to tolerate periodic flooding, or employ other effective means of addressing the impacts of future sea level rise and storm activity." Related policies on Shoreline Protection state, in part, that "New shoreline protection projects and the maintenance or reconstruction of existing projects should be authorized if...(c) the project is properly engineered to provide erosion control and flood protection for the expected life of the project based on a 100-year flood event that takes future sea level rise into account..." Related policies on Public Access state, in part, that "Public access should be sited, designed, and managed and maintained to avoid significant adverse impacts from sea level rise and shoreline flooding," and "Any public access provided as a condition of development should either be required to remain viable in the event of future sea level rise or flooding, or equivalent access consistent with the project should be provided nearby." Additionally, Senate Bill No. 379 (Jackson, 2015) states, "This bill would, upon the next revision of a local hazard mitigation plan on or after January 1, 2017, or, if the local jurisdiction has not adopted a local hazard mitigation plan, beginning on or before January 1, 2022, require the safety element to be reviewed and updated as necessary to address climate adaptation and resiliency strategies applicable to that city or county." The NOP indicates that the Health and Safety Element of the General Plan update would address flood hazards. The DEIR should discuss whether the General Plan elements would be consistent with the Bay Plan policies on or related to Climate Change and flooding, as well as with Senate Bill No. 379.

Newly Adopted Bay Plan Policies. BCDC recently adopted two amendments to the Bay Plan, which are now pending administrative law reviews and are likely to be in place by the time a DEIR is prepared for the City of Sausalito's General Plan update. The first of these amendments includes policy revisions to allow fill for habitat projects and proposes amendments to the Bay Plan policies on Fish, Other Aquatic Organisms, and Wildlife; Tidal Marshes and Tidal Flats; Subtidal Areas; Dredging; and Shoreline Protection. If any habitat restoration projects are envisioned for inclusion in the General Plan update, the DEIR should discuss whether the General Plan elements would be consistent with these new Bay Plan policies. The second recently adopted Bay Plan amendment proposes a new section of the Bay Plan on environmental justice and social equity, as well as proposes revisions to the Public Access, Shoreline Protection, and Mitigation sections of the Bay Plan. The NOP indicates that diversity and community identity will be addressed in the Community Design and Historical Preservation Element. The NOP also included a brief summary of the two-year public process leading up to this General Plan update. BCDC commends the City for taking steps to create a community-driven process, as the newly adopted policies include requirements regarding meaningful community involvement. Additionally, Senate Bill No. 1000 (Leyva, 2016) states, in part, that "This bill would...add to the required elements of the general plan an environmental justice



element, or related goals, policies, and objectives integrated in other elements..." and "...would require the environmental justice element, or the environmental justice goals, policies, and objectives in other elements, to be adopted or reviewed upon the adoption or next revision of 2 or more elements concurrently on or after January 1, 2018." The DEIR should discuss whether the General Plan elements would be consistent with these new Bay Plan policies on environmental justice and social equity, as well as with Senate Bill No. 1000.

Richardson Bay Special Area Plan (RBSAP). The RBSAP applies to the Bay waters and shoreline areas covered by the General Plan. The RBSAP contains findings and policies on seven topics: the *Aquatic and Wildlife Resources* policies call for maximum protection of wildlife habitat and for buffers between development and the shoreline. The *Water Quality* policies address discharge into the Bay, including sewage and graywater discharge, urban runoff, and sediment due to erosion. The *Navigation Channels, Marinas, Anchorages, and Moorages* and *Dredging and Spoils Disposal* policies address the maritime future of Richardson Bay and discuss where dredging should occur, to what depth, and where the spoils should be placed. The *Residential Vessels and Floating Structures* policies address where certain vessels should be allowed. The *Public Access, Views, and Vistas* policies call for maximum feasible public access to and along Richardson Bay consistent with each project proposed there, and include information about how public access should be designed. In addition, the policies call for a continuous unified public access system around the entire periphery of Richardson Bay. The *Tidal Restoration and Marsh Enhancement* policies establish general guidelines, as well as specify goals for specific areas around Richardson Bay. Any projects proposed within the RBSAP area must be consistent with the RBSAP.

Existing BCDC Permits. There are a number of existing BCDC permits in the project area. The DEIR should discuss the effects, if any, that the changes to the General Plan would have on existing public access or other conditions required by these permits.

Thank you for the opportunity to comment on the NOP for the City of Sausalito's General Plan Update DEIR. If you have any questions regarding this letter, or any other matter, please do not hesitate to contact me by phone at 415/352-3613 or email, clesi.bennett@bcdc.ca.gov.

Sincerely,



CLESI BENNETT
Coastal Planner
San Francisco Bay Conservation and Development Commission

CB/ra



DEPARTMENT OF TRANSPORTATION

DISTRICT 4

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a California Way of Life.*

November 18, 2019

SCH #2019100322

GTS # 04-MRN-2019-00150

GTS ID: 17435

MRN/101/PM 1.59

Lilly Whalen, Community Development
Department Director
Community Development Department
City of Sausalito
420 Litho Street
Sausalito, CA 94965

Sausalito General Plan Update - Notice of Preparation (NOP)

Dear Lilly Whalen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Sausalito General Plan Update. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the October 2019 NOP.

Project Understanding

The City of Sausalito General Plan Update is an effort to refine the objectives, policies, and programs within the existing General Plan to help guide and shape the community over the next 20 years. The Sausalito General Plan Update seeks to preserve Sausalito's historic character, public open space, and natural resources, while enhancing public access to the waterfront and pedestrian and bicycle circulation. The proposed project also seeks to support a working waterfront. The purpose of the proposed project is to bring the General Plan up-to-date and to reflect current regulations. The Marinship Specific Plan will be superseded with the adoption of the City of Sausalito General Plan Update. The General Plan Update will consider land use issues within City limits as well as immediately adjacent properties located within its Sphere of Influence (SOI). Sausalito's SOI has decreased since the 1995 General Plan was adopted and the accuracy of the current SOI will be verified through the General Plan Update process. US-101 runs through Sausalito city limits.

Travel Demand Analysis

Please submit a travel demand analysis that provides a VMT analysis. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development to ensure alignment with State policies using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and VMT as the primary transportation impact metric. Please ensure that the travel demand analysis includes a VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, the Office of Planning and Research's Draft Guidelines. Projects that result in automobile VMT per capita greater than 15% below existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

Multimodal Planning

The Sausalito General Plan Update should address effects on pedestrians, bicyclists, travelers with disabilities, and transit users, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. These smart growth approaches should be consistent with MTC's Regional Transportation Plan/Sustainable Communities Strategy (SCS) and would help meet Caltrans Strategic Management Plan targets.

Vehicle Trip Reduction

The Sausalito General Plan Update should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below can promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Outdoor areas with patios, furniture, pedestrian pathways, picnic and recreational areas;
- Transit and trip planning resources such as a commute information kiosk;
- Increasing access to common goods and services, such as groceries, schools, and daycare;
- Providing traffic calming;
- Real-time transit information system;

- Ten percent vehicle parking reductions;
- Lower parking ratios;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Emergency Ride Home program;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If a project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would help meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Transportation Impact Fees

The Lead Agency should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the land use/growth management and circulation/parking elements proposed within the general plan; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. The Lead Agency should also consider fair share fees for shuttles that use the public curb space.

Lilly Whalen, Community Development Department Director

November 18, 2019

Page 4

The City should also ensure that a capital improvement plan identifying the cost of needed improvements, funding sources, and a scheduled plan for implementation is prepared along with the General Plan. Caltrans welcomes the opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Lead Agency

As the Lead Agency, the City of Sausalito is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Andrew Chan at 510-622-5433 or andrew.chan@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Mark Leong". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

From: [David Davenport](#)
To: [Bill Meeker](#)
Cc: [Norma Jellison](#); [Ron Downing](#)
Subject: Sausalito General Plan Update NOP Comments
Date: Monday, December 09, 2019 10:29:35 AM

CAUTION: External Sender

December 9, 2019

Bill Meeker, Planning Advisor
Community Development Department
City of Sausalito
420 Litho Street
Sausalito, CA 94965

Re: Notice of Preparation for the Sausalito General Plan Update Program Environmental Impact Report

Dear Mr. Meeker:

Thank you for the opportunity to comment on the Notice of Preparation for the Sausalito General Plan Update Program Environmental Impact Report. The Golden Gate Bridge, Highway and Transportation District (District) provides public transit service to, from, and within Sausalito on several Golden Gate Transit bus routes as well as the Golden Gate Ferry. The District looks forward to supporting the City of Sausalito's efforts and providing comments, as necessary, in the environmental review process. Please feel free to contact me if you have any questions about the District's transit services.

Yours sincerely,
David Davenport
Senior Planner

C: N. Jellison, R. Downing

David Davenport
Senior Planner
Golden Gate Bridge, Highway & Transportation District
1011 Andersen Drive
San Rafael, CA 94901
415-257-4546
ddavenport@goldengate.org

From: sandrabushmaker <sandrabushmaker@yahoo.com>
Sent: Thursday, October 17, 2019 1:09 PM
To: Sausalito General Plan Update <info@sausalitogeneralplan.org>
Subject: Re: NOP for Environmental Impact Report published, public meeting on Nov. 4

What kind of comments are you seeking? Please describe. Thank you.

Sandra Bushmaker

Sent from my Sprint Samsung Galaxy Note9.

----- Original message -----

From: Sausalito General Plan Update <info@sausalitogeneralplan.org>
Date: 10/17/19 12:25 PM (GMT-08:00)
To: sandrabushmaker@yahoo.com
Subject: NOP for Environmental Impact Report published, public meeting on Nov. 4

CITY OF SAUSALITO GENERAL PLAN UPDATE



NOTICE OF PREPARATION (NOP) PUBLISHED!

The Notice of Preparation (NOP), which kicks off the environmental review process for the General Plan Update, is [now available online](#). This publication begins a 30-day comment period, which includes a public scoping meeting scheduled for Monday, November 4th, 2019 at 7:00 p.m. in the Council Chambers.

Date: November 4, 2019

Time: 7:00 p.m.

Location: Sausalito City Hall, 420 Litho St., Sausalito, CA 94965

If you have any questions, please contact us at: info@sausalitogeneralplan.org

Best,
Tom Ford, Project Manager, M-Group
Sausalito General Plan Update Project Team





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October 29, 2019

Mr. Bill Meeker, Planning Advisor
Community Development Department
City of Sausalito
420 Litho Street
Sausalito, CA 94965

Re: Comments on the Scope and Content of the Program EIR
City of Sausalito General Plan Update

These comments are offered pursuant to the Notice of Preparation of a Program Environmental Impact Report (NOP) dated October 16, 2019. As noted in the NOP, the General Plan Advisory Committee (GPAC) has had regularly scheduled meetings since June 20, 2017. I am a member of the GPAC, and have attended all meetings (except two), and most supplemental events such as tours, stakeholder meetings, pop-ups and community forums.

These comments pertain to the portion of the EIR that will address the Marinship.

On October 9, 2018, the City Council adopted a list of Goals for the General Plan Update (Attachment 1). Taken together, these goals recognize that a strong economic base is essential to provide the resources needed to sustain the small town quality of life that is the core of what defines Sausalito. These goals are not mutually exclusive, and require careful balancing.

Regarding the Marinship, your attention is directed to goals 3, 4, 5, and 6 – particularly No. 5. How can these be achieved, given the overriding issue facing us, namely sea level rise and subsidence? Within that context, how do we sustain economic vitality, preserve jobs, fund infrastructure improvements and provide flexibility to meet future opportunities – while preserving and enhancing our maritime industry? And don't forget that the Marinship is a significant contributor to the tax base of Sausalito¹.

Recognizing all of these factors for economic sustainability, the GPAC started reviewing the economic impact of Marinship land use alternatives well over a year ago. During this process, they were presented by the M-Group as three broad conceptual alternatives – “Improved Business as Usual”, “Strategic Adjustments” and “Values-Based Growth”. There was to be an Economic Quantitative Analysis, with modelling options for each, reporting a variety of metrics. This effort was to explore options needed to “[Plan] for fiscal sustainability by encouraging businesses with high fiscal value but limited negative impacts to the community.”

¹ According to the Economic Development Proposal presentation, City Council, August 27, 2019: The Marinship contributes 52% of non-residential property tax, 35% of sales tax, and 62% of business license fees (former schedule). Altogether, the Marinship contributed over \$1.5 million in City revenues for the study period year (adjusted for the Prop”O” increment).

A portion of the proposed Quantitative Analysis was completed in August, 2019 by Economic & Planning Systems (EPS). This Residual Land Value study compared various building prototypes and uses for profitable development potential. This indirectly translates to potential contributions to infrastructure improvements and the long-range economic viability of the area. I offered an alternate proforma using EPS assumptions that combined the study's FAR and use analyses (Attachment 2). This Office/R&D Scenario allows office use in a building with a 0.60 FAR (1978 historic level).

As the NOP states, the EIR is intended to investigate the impacts of a range of "reasonable alternatives". The permitting of office use in selected portions of the Marinship is an important reasonable alternative to consider for several reasons beyond any future economic benefit. Most importantly, it will recognize reality. In today's world, most of the uses preferred for the area are actually conducted by people sitting in "offices". Graphic artists, architects, applied artists, industrial designers and product developers are mostly all in this group. Anecdotal evidence suggests that many existing industrial spaces have office build out exceeding the 15% permitted in the I-zone. Asking rents suggest so as well, being 50% - 100% higher than what would be expected for basic industrial space.

For example, the latter was noted by Gary Testa of Engineered Fluids, representing a relatively noisy industrial business in the Marinship who has appeared before the GPAC. He is having trouble finding affordable expansion space. Recognizing the reality of how businesses operate, even if he could find 20-25K square feet, he paradoxically said it would be 50-60% office space along with their manufacturing.

The NOP states that when setting the parameters of the EIR, only "reasonable foreseeable probable future projects" need be considered. The most obvious and universally supported limitation is to consider only the I District. Any change to the W District in this regard is strictly off limits. Additionally, if the Marinship were to be divided into three geographic districts for study, the alternative use could be limited to just the middle area (potentially defined as One Harbor Drive to Marinship Plaza). In any event, throughout the Marinship there are a very few unimproved parcels or economically viable redevelopment parcels to be considered as "probable".

It's unfortunate that the Land Economic Study for the Marinship will not be completed before the EIR is well advanced or completed. Given the results of similar studies in the past², it is probable that businesses utilizing office space may end up on a preferred list. This is another reason to include office use in the EIR spectrum of alternatives. We'll know in advance if the Study recommendations are viable.

Finally, knowing the environmental impacts of this alternative will provide information for thoughtful policy decisions. There is a difference between information and advocacy. Information is needed for decisions that go well beyond economics. Decisions that take into

² For example, *Sausalito Community and Economic Development Study*, 2012

account Sausalito's history, cultural heritage and soul of the community. Choosing the proper balance among the alternatives to achieve all the General Plan Goals can only be made with informed information. For all of these reasons, office use at a proper FAR must be an alternative included in the Marinship EIR alternatives.

Thank you.

Peter Van Meter
4 Cloud View Circle
Sausalito, CA 94965
(415) 699-2739 (cell)
mycre@pacbell.net

Alternate Proformas

	Inceased FAR Scenarios			
	Light Industrial*		Office/R&D**	
	Assumption	Amount	Assumption	Amount
Development Program				
Gross Land Area (acres)		1.0		1.0
Gross Land Area (sq. ft.)		43,560		43,560
Floor Area Ratio (Excluding Parking)	0.60 FAR		0.60 FAR	
Gross Building Area (sq. ft.)		26,136		26,136
Number of Stories	2 (Ground + Mezz.)		2 Floors - Footprint:	13,068
Lot Coverage (sq. ft.)	0.50	21,780	0.50 Allowable	21,780
Leaseable Area (sq. ft.)	90% Efficiency Ratio	23,522	85% Efficiency Ratio	22,216
Parking Spaces (Surface)	2.2 spaces/1,000 GSF	57	3.3 spaces/1,000 GSF	86
Parking spaces (sq. ft.)	350 sq. ft. / space	20,125	350 sq. ft. / space	30,187
Footprint plus Parking		41,905		43,255
	Adjust FAR for coverage and park No		Yes, from .70	
Revenue Assumptions				
Avg. Lease Rate (Full Service)	\$30 /net sq. ft./yr.	\$705,672	\$60 /net sq. ft./yr.	\$1,332,936
Vacancy Rate	5%	<u>(\$35,284)</u>	5%	<u>(\$66,647)</u>
Gross Revenue		\$670,388		\$1,266,289
(less) Operating Expenses	20%	(\$134,078)	20%	(\$253,258)
(less) Commissions	3%	<u>(\$20,112)</u>	3%	<u>(\$37,989)</u>
Subtotal		(\$154,189)		(\$291,247)
Annual Net Operating Income		\$516,199		\$975,043
Capitalized Value	6.5%	\$7,941,524	6.5%	\$15,000,657
Development Costs				
Permits and Fees	2.5% of direct costs	\$143,530	2.5% of direct costs	\$211,157
Hard Costs				
Building	\$140 /Building sq. ft.	\$3,659,040	\$180 /Building sq. ft.	\$4,704,480
Tenant Improvements	\$30 /net sq. ft.	\$705,672	\$100 /net sq. ft.	\$2,221,560
Parking (Surface)	\$5,000 /Space	\$287,496	\$5,000 /Space	\$431,244
Site Work	\$25 /Land sq. ft.	<u>\$1,089,000</u>	\$25 /Land sq. ft.	<u>\$1,089,000</u>
Total Direct Costs		\$5,741,208		\$8,446,284
Soft Costs				
	24.5% of direct costs (Indirect)	\$1,406,596		\$2,069,340
Subtotal of fees, direct and indirect costs		\$7,291,334		\$10,726,781
Contingency (% of subtotal)	5%	<u>\$364,567</u>	5%	<u>\$536,339</u>
Subtotal		\$7,655,901		\$11,263,120
Developer Profit (% of all costs)	12%	<u>\$918,708</u>	12%	<u>\$1,351,574</u>
Total Costs		\$8,574,609		\$12,614,694
Residual Land Value (per acre)		(\$633,085)		\$2,385,963
Per Land Square Foot		(\$15)		\$55

* Light Industrial: Increased FAR to 0.60 (incorporating some mezzanine space.) Increased efficiency to 90%. Reduced rent from \$45 to \$30 - still too high if office buildout is limited to 10-15% for occupancy permit. Should be in the \$20 range.

** Office/R&D: FAR increased to the constrained limit of 0.60 (parking). This is the historic (1978) FAR. Other assumptions unchanged. This is a test for max. revenue, given the other analysis assumptions. (Information only, not an endorsement.) The \$975K NOI compares with the \$504K and \$700K NOIs in the other examples, suggesting a greater potentially available contribution to SLR mitigation.

Attachment 1
NOP Comments

Community Goals to express Sausalito's twenty-year vision for the General Plan

As revised and endorsed by the City Council on October 9, 2018

1. **Residential** - Maintain Sausalito's small scale residential neighborhoods, recognizing their geographical, architectural, and cultural diversity, while supporting a range of housing options.
2. **Characteristics** - Recognize and perpetuate the defining characteristics of Sausalito, including its scenic features, natural and built environment, its history, and its diverse culture.
3. **Business** - Recognizing their importance to Sausalito's economic vitality, encourage businesses and activities that have high municipal revenue generation potential and low environmental impact.
4. **Waterfront** - Preserve Sausalito's waterfront as a natural resource while carefully balancing the needs and desires of water-dependent businesses, water-related activities, and amenities for the general public, including access to and from the bay.
5. **Marinship** - Recognizing their role and importance to the Bay Area and the City's cultural, historic, and economic diversity, and quality of life, encourage industrial, arts, and water-dependent or water-related activities in the Marinship and support these activities through the inclusion of compatible businesses and uses along with other uses that can adapt to changing economic conditions.
6. **Fiscal** - Ensure fiscal sustainability to provide an appropriate level of public services including upgrading, modernizing, and maintaining Sausalito's infrastructure.
7. **Safety** - Safeguard the natural environment and ensure community health, safety and resilience, including addressing the inherent risks of climate change, sea level rise and subsidence.
8. **Circulation** - Provide a variety of circulation options through and within Sausalito.
9. **Tourism** - Manage tourism to minimize impacts on the community while supporting a quality visitor experience.
10. **Independence** - Engage proactively with regional and State-level policy efforts to ensure that Sausalito's vision, goals, and quality of life are sustained in the long term.

Note: Paragraph titles added here for subject clarification – not a part of Council action.

Mr. Meeker,

About two years ago my father, Skip Berg, was diagnosed with lewy body dementia. He met my mom in line at Sushi Ran right here in Sausalito about 35 years ago. He got her number and eventually had me and my seven other siblings. As a family, we've owned Marina Plaza, an office building and 103 slip marina in the Marinship for 20+ years. During that time we've helped host events like the Sausalito Art Festival (Which we don't charge as they haven't made \$ last few years), the building of the Matthew Turner Tall Ship (Rent was \$1 a year), AID's Lifecycle, Fatham, Avon Breast Cancer Walk, Big Bounce America, and many others. During the recent fires, when the wind kicked up and anchor outs as well as others were being buffeted by the strongest winds since 1913, a city official called me to see if we could help, and we were happy to offer our marina as potential sanctuary. It has always been a family and business value to be helpful.

With that spirit, I was dismayed when I tried to help my father find a place to live and receive memory care in Sausalito. We looked at Rotary and other projects in the city, as well as places outside like Tam, Redwoods, and Aegis Corte Madera only to find that the process was confusing, didn't fit his situation and had a multiyear waitlist. Finally, we found a place for him near my two sisters who live in Santa Rosa, but that was not where he wanted to be.

A little while after going through that the process with my father, I became aware of the General Plan Update and thought about how we might be able to better utilize our existing site to help with the senior care crisis. I talked to city officials who encouraged me to look a little deeper at our site. After taking away all preconceptions and viewing the site with fresh eyes and considering all potential uses that would also meet a community need, it quickly became apparent that senior would be best for all stakeholders as it would likely have the least significant impact vs. the existing legal non-conforming office use. Throughout this process I met with the Villagers, Edgewater Seniors, Rotary, and other senior advocacy groups.

I discovered that Sausalito was a World Health Organization Age Friendly City and as part of the housing element, the city's seniors stated that they wanted housing that allowed them to "age in place" gracefully. To me, this meant a full spectrum of care community i.e. independent living, assisted living, and memory care. This type of community is rare in the area. Currently, there are only 38 units of independent affordable and market rate senior housing in Sausalito according to the Marin County Commission on Aging. The same report indicated that about 10% of the senior population would want to live in senior facility now. That'd be about 270 people in Sausalito by their estimate. That said, about 57% of 1,151 Sausalito Senior's surveyed said they'd consider moving to Senior/Assisted communities now and in the future. I also learned that from 2000-2010, the population of people over 60 in Sausalito increased 72%, and that is projected to continue to increase to 3,169 in 2030.

A senior use on a site like ours would not displace any existing housing thus requiring housing to be built elsewhere which would be a less than significant impact or no impact. However, it would help to open up houses on the hills, which are tough to age in for people that aren't very ambulatory, hence the Call a Ride for Sausalito Seniors (CARSS) program, to younger families that can purchase and improve the homes which would help to increase the cities' tax base and

provide more efficient use of the existing housing stock. Our neighbors on either side: The Army Corps of Engineers, represented by Chris Gallagher and the storage yard & RV park owned by Francine Clayton would both support this use on our site. When we compare to our current office use as an 86k SF building with the rule of thumb of 120 SF for every person we get 716 people. Traffic wise, even a project of size with greater density per acre than anything existing now in the City of Sausalito and two people per unit (which is unlikely) wouldn't come close to the traffic we could have in our existing use, as it'd be less people nominally and seniors don't tend to drive during peak hours like office workers. We could also look at having certain care personnel living onsite in subsidized units to reduce traffic and increase quality of care. In our case, a Senior use would displace no art, maritime, or industrial use. These existing uses I support fully protecting in the General Plan as they give Sausalito it's unique charming character and many folks in the working waterfront do great innovative work. We know the city wants to encourage senior housing through the existing 33% density bonus which is greater than the state's 20%, but we also know from Ron Albert at Rotary and other senior housing advocates that there is almost no place to build this housing that makes economic sense in areas where it is currently allowed by zoning. There is a huge demonstrable need for senior housing and more importantly continuum of care. This need is only going to be more dire in the short and medium term. The city has said in their housing element they'd support senior housing and code has attempted to do that, but there are few economically viable sites. Given this, Senior uses where they are not currently should be studied.

Any group needs good information to make good decisions. Accordingly, I think the CEQA process is the right tool for that job. Because of the clear broad-based support and demand for senior housing, this potential use should be included in the EIR so decision makers can analyze real-world information to potentially include in the update. In my meetings with seniors I've also learned many, due to lack of experience with computers, are not aware these general plan decisions are being made and cannot come out to these later meetings as they don't travel after dark from their homes on the hill for fear of falling. Even so, seniors have written in and voiced their desires through Tricia Smith and others who have spoken and continue to speak in support for seniors as well. When I asked the Edgewater Seniors at a recent meeting for their thoughts on the General Plan Update so far, Vera, a spunky German who had lived in the Amazon rainforest as a young woman commented, "Even if we don't get to see more senior housing built while we're around, we should still speak up for the ones who will benefit."

Based on all of the above, I would encourage the EIR to consider senior housing at the density per acre of an existing use, like R-3 or existing successful senior developments like the 22 unit Rotary project on Olima. The EIR should inform decision makers of the potential to have senior housing on sites with existing legal non-conforming uses so we can retain Sausalito's most valuable resource – it's seniors...Sadly, I've met many that plan on leaving the city for lack of continuum of care housing. An EIR to consider the possibility to allow them to age in place gracefully in areas where appropriate would be critical to understanding if Sausalito can practically deliver on the values espoused in the housing element, density bonuses, and as an age friendly city.

A handwritten signature in black ink, appearing to read "Carlo Berg". The signature is fluid and cursive, with a large loop at the end.

Older Adult Housing in Marin: Planning for 2030



Social gathering at the Tamalpais, Greenbrae



New Junior Accessory Dwelling Unit (JADU) in Corte Madera

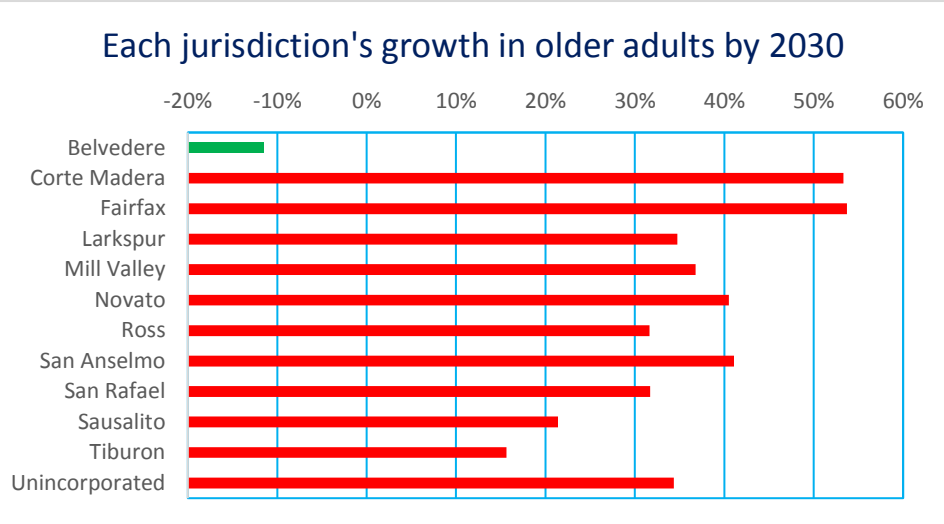


Double Rainbow over Marin Valley Mobile Country Club, Novato

Initial Report: April 6, 2018

*Will be revised periodically. Please send requests for revision to:
Michael R. Hagerty, Professor Emeritus, UC Davis, mrhagerty@ucdavis.edu
Ralph Marchese, Vice-Chair, Marin County Commission on Aging
Linda M. Jackson, Program Director, Marin Aging Action Initiative*

Marin County is already among the oldest counties in California in median age, and older residents will increase another 35% by 2030 – just 12 years from now. Some cities will see explosive growth:



Where will all these older adults choose to live? 90% want to “Age in Place” in their own homes.

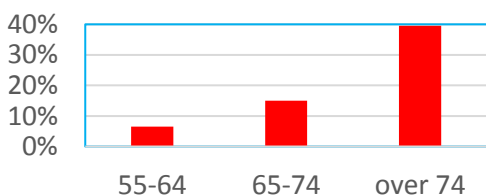


Marin’s 3 Barriers to “Aging in Place”:

- 80% of older adults have NOT rehabbed their house to age safely with grab bars, walk-in showers, etc. *Older adults need to fix “trip and fall” hazards, get contractors or Rotary to install grab bars, etc.*
- 70% of older adult homeowners have NOT converted an extra bedroom/bathroom to a “second unit,” even though they could, to supplement income or provide space for caregivers. *State and local governments have recently streamlined these units. Now older adults must take advantage and invite free estimates from contractors, building departments.*
- 25% of Marin older adult households DON’T own their home but rent. As rental prices increase and retirement incomes stay flat, more affordable older adult housing will be necessary. *Leverage new “second units”, join together to find ways to assuage NIMBY (Not in My Back Yard) concerns.*

A Marinite who turns 60 today can expect to live to 86 – longer than most Americans, and with fewer disabilities. But some loss of function is often unavoidable: below is the

Probability of disability in Marin for older age groups



probability of a disability occurring at older ages (such as difficulty walking, climbing stairs, reaching, etc.) Planning ahead to overcome the 3 barriers to “Aging in Place” will keep us and our loved ones healthy and secure, with meaningful lives long beyond retirement.

Older Adult Housing in Marin: Planning for 2030

By

Michael R. Hagerty, Professor Emeritus, UC Davis

Ralph Marchese, Vice-Chair, Marin County Commission on Aging

Linda M. Jackson, Program Director, Marin Aging Action Initiative

SUMMARY: *Marin County is among the oldest counties in California, so is on the forefront of the longevity trend of baby-boomers who will retire by 2030. This report is the first to forecast the older adult population and housing needs for each of the 12 jurisdictions in Marin. Table 1 shows that some cities face a 50% increase in residents 60 and older in 2030 – just 12 years in the future. Table 3 turns to forecasting the number of new households headed by a older adult for each city. Figure 1 summarizes the complex housing decisions that each older adult household will face. Tables 5, 6, and 8 forecast what types of housing will be needed in 2030, and compares this with Marin’s existing inventory in Table 9. There are 4 findings: (1) Marin older adults need to retrofit their homes to be more accessible, so they can age in place successfully, (2) Second units (Accessory dwelling units and Junior Accessory Dwelling Units) have the potential to provide more affordable housing, and to help older residents age in place, (3) Marin has about the right number of skilled nursing homes and assisted living units for the present, though the needs may increase by 35% in 2030, and (4) Marin has a major shortage in affordable units for older adults. This report is intended to enable planning by each City Council and the county Board of Supervisors to meet future housing needs of older residents in their community.*

This report benefited from the comments and expertise of many housing experts in Marin, including Bob Pendoley and Lisel Blash of Marin Environmental Housing Coalition, Leelee Thomas and Debbie La Rue of Marin Community Development Agency, Carmen Soruco of Marin Housing Authority, Bob Brown of Novato Community Development Department, Neal Toft of Larkspur Planning Department, Christina Gotuaco of EAH, Dana Pepp of Senior Access, Rachel Ginis and Ellen Nicosia of LilyPad Homes, Rochelle Ereman and Lee Ann Prebil of Marin County Health and Human Services, Lee Pullen, Jenay Cottrell, and Amy Dietz of Marin County Aging and Adult Services, and Salamah Locks and the entire Marin Commission on Aging. Any errors are solely the responsibility of the authors.

* Authors may be contacted at: mrhagerty@ucdavis.edu , Ralph.Marchese@marchesecco.com , Linda.m.jackson@agingactioninitiative.org

1. HOW MUCH GROWTH WILL EACH CITY IN MARIN HAVE BY 2030?

The California Department of Finance (DOF) publishes forecasts of county growth trends. They estimate that *total population* in Marin in 2030 will grow by only 5%, but this masks a critical change in age distribution. The number of children under 19 is expected to drop by 14%, and the number of working-age people is expected to increase by 6%. *But the number of older adults (people age 60 and over) will grow by 37% in Marin County by 2030.*

The Department of Finance does not break down their estimates by individual city, but this is necessary to give forecasts to each jurisdiction. We used the DOF demographic modeling technique, taking the actual number of residents (using the 2015 Census Bureau's American Community Survey) in each age range in each city in Marin, and accounting for normal death rates as they age (using the most recent data from the Center for Disease Control.) For example, the 1,093 residents in San Anselmo who are age 45-49 years old in 2015 will turn 60 by 2030. 7.5% of them will die before then, but the rest will reach that age. Similarly, the 905 residents in San Anselmo who are age 65-70 in 2015 will turn 85 by 2030. 31% of them will die before then, but the rest will reach that age.

Table 1 details the surprising results for each of the 12 jurisdictions in Marin County.

TABLE 1: OLDER ADULT RESIDENTS AGE 60 AND OVER IN EACH MARIN JURISDICTION IN 2015 AND 2030. FORECASTING ERROR IS SHOWN IN FOOTNOTES.

	Older adults in 2015	Older adults in 2030	% increase
Belvedere	906	802 ^a	-12%
Corte Madera	2,207	3,384 ^a	53%
Fairfax	1,828	2,810 ^a	54%
Larkspur	3,568	4,808 ^a	35%
Mill Valley	3,803	5,202 ^a	37%
Novato	13,587	19,093 ^b	41%
Ross	625	823 ^a	32%
San Anselmo	3,368	4,752 ^a	41%
San Rafael	13,822	18,207 ^b	32%
Sausalito	2,611	3,169 ^a	21%
Tiburon	3,178	3,675 ^a	16%
Unincorporated Marin	19,218	25,824 ^b	34%
Total Marin	68,721	92,547^b	35%

Source: American Community Survey 2015, National Vital Statistics Reports Vol 65, No. 8, Table B.

^aForecasting error for these smaller cities is $\pm 10\%$, from American Community Survey 2015.

^bForecasting error for these larger cities is $\pm 5\%$, from American Community Survey 2015.

All cities (except Belvedere) will face rapidly increasing demand for older adult housing. Fairfax and Corte Madera have far higher increases in older adults in 2030 than San Rafael, because San Rafael has a much younger population that will not turn 60 for many years. In contrast, Fairfax and Corte Madera have many residents now in their 50s and early 60's, so they will see the fastest increase in older adult needs.

Future forecasts always have uncertainty associated with them, and the footnotes in Table 1 show that the estimates for 2030 have uncertainty of plus or minus 5% to 10%, depending on how large the sample was from the ACS (That is, the 90% confidence interval around San Anselmo's older adult forecast from sampling is 4752 \pm 475.) In addition, there are uncertainties in the future that no forecasts can predict, such as a pandemic that reduces life expectancy (more likely is a continuing slow increase in life expectancy, where slightly more older adults survive). Finally, we assumed that net migration patterns continue as they are, but sudden changes between cities would affect the 2030 forecast. We will continually update these forecasts to take these trends into account.

2. WILL THE AVERAGE AGE OF OLDER RESIDENTS INCREASE, COMPARED TO 2015?

Table 2 breaks down the increase in older adults to 5-year age groups. The first column projects older adults in 2030 who will be between 60 and 65 years old, and shows a 5% decline (because these are the "baby bust" generation born after 1970). But the later columns show very large increases due to the "baby boom generation, with the number of people over age 75 increasing by an average of 80%.

TABLE 2: RESIDENTS 60 AND OVER, BY AGE CATEGORY IN MARIN JURISDICTIONS IN 2030.

	60 to 65 years	65 to 69 years	70 to 74 years	75 to 79 years	80 to 84 years	85 years and over
Belvedere ^a	148	93	131	175	124	131
Corte Madera ^a	640	858	710	452	362	361
Fairfax ^a	590	611	581	501	312	215
Larkspur ^a	1,064	1,027	915	547	628	625
Mill Valley ^a	1,174	1,198	848	705	654	622
Novato ^b	3,711	4,164	3,685	3,403	2,301	1,829
Ross ^a	158	177	141	169	93	84
San Anselmo ^a	931	978	823	958	620	441
San Rafael ^b	4,251	3,630	3,404	2,819	1,895	2,208
Sausalito ^a	473	660	495	686	452	403
Tiburon ^a	764	795	483	612	439	582
Unincorporated Marin ^b	5,244	4,758	4,931	4,808	3,276	2,806
Total Marin ^b	19,149	18,948	17,148	15,834	11,158	10,309
% increase in older adults in 2030	-5%	16%	48%	98%	88%	53%

Source: American Community Survey 2015; National Vital Statistics Reports Vol 65, No. 8, Table B;

^aForecasting error for these smaller cities is \pm 20%, from American Community Survey 2015.

^bForecasting error for these larger cities is \pm 10%, from American Community Survey 2015.

3. HOW DOES THIS TRANSLATE INTO NEW OLDER ADULT HOUSEHOLDS?

The number of current households headed by a older adult is shown in column (1) of Table 3 below, drawn from the American Community Survey 2015 for each city. The second column calculates this as a percent of all current households headed by a older adult. Surprisingly, 60% of all households in Belvedere are currently headed by a person over 60 years old, and 44% of all households in Marin county overall are headed by a older adult, despite the fact that only 27% of Marin's population are older adults. But of course children under 18 never head a household, and the likelihood of heading a household increases sharply with age. Nevertheless, it is sobering that even in 2015, almost half of all households in Marin are headed by a older adult. That number is expected to increase further by 2030.

Projections of older adult households in 2030 were made by taking the new older adults forecast from Table 1 and dividing by the average household size. Average household size for older adults currently is just 1.54 in Marin, much smaller than for households with kids. Almost half of older adults currently live alone, and if we project the same for 2030, then the total older adult households in 2030 in each city is shown in column (3), and the % increase in older adult households is shown in column (4) below.

Table 3: Households headed by people 60 and over, 2015 and 2030.

	(1) Older Adult Households in 2015	(2) % of all Households in 2015	(3) Older Adult Households in 2030	(4) % Increase in Older Adult Households in 2030
Belvedere	555	60%	500	-10%
Corte Madera	1,512	40%	2,135	41%
Fairfax	1,214	35%	1,778	46%
Larkspur	2,592	44%	3,023	17%
Mill Valley	2,449	42%	3,275	34%
Novato	8,818	41%	12,043	37%
Ross	325	43%	518	59%
San Anselmo	2,141	41%	2,996	40%
San Rafael	8,845	39%	11,461	30%
Sausalito	1,635	43%	1,986	21%
Tiburon	1,963	51%	2,299	17%
Unincorporated Marin	14,844	52%	16,253	9%
Total Marin	46,893	44%	58,266	24%

Source: American Community Survey 2015; Table 2 and 3 above.

4. WHAT TYPES OF OLDER ADULT HOUSING WILL BE NEEDED FOR THIS OLDER POPULATION?

Figure 1 shows a flowchart of the typical housing decisions that older adults must make when they near retirement. At the top level, their fundamental decision is whether to “age in place” to stay near friends and family, or whether to move to a place that serves older adults’ needs better (walking distance to shopping, neighbors with similar interests, housing that requires less maintenance). A national survey (*The United States of Aging 2012* by AARP) reports that about 90% of older adults intend to stay in their own homes for the next 5 to 10 years. For these folks, no new housing will be needed, but substantial renovations should be made to improve safety and accessibility, such as grab bars, reducing trip hazards, easy-entry showers, etc. Unfortunately, only 23% of those over 70 have made substantial modifications to their homes. This increases the risk of falls (the most common accident for older adults) and makes it more difficult to recover from illnesses.

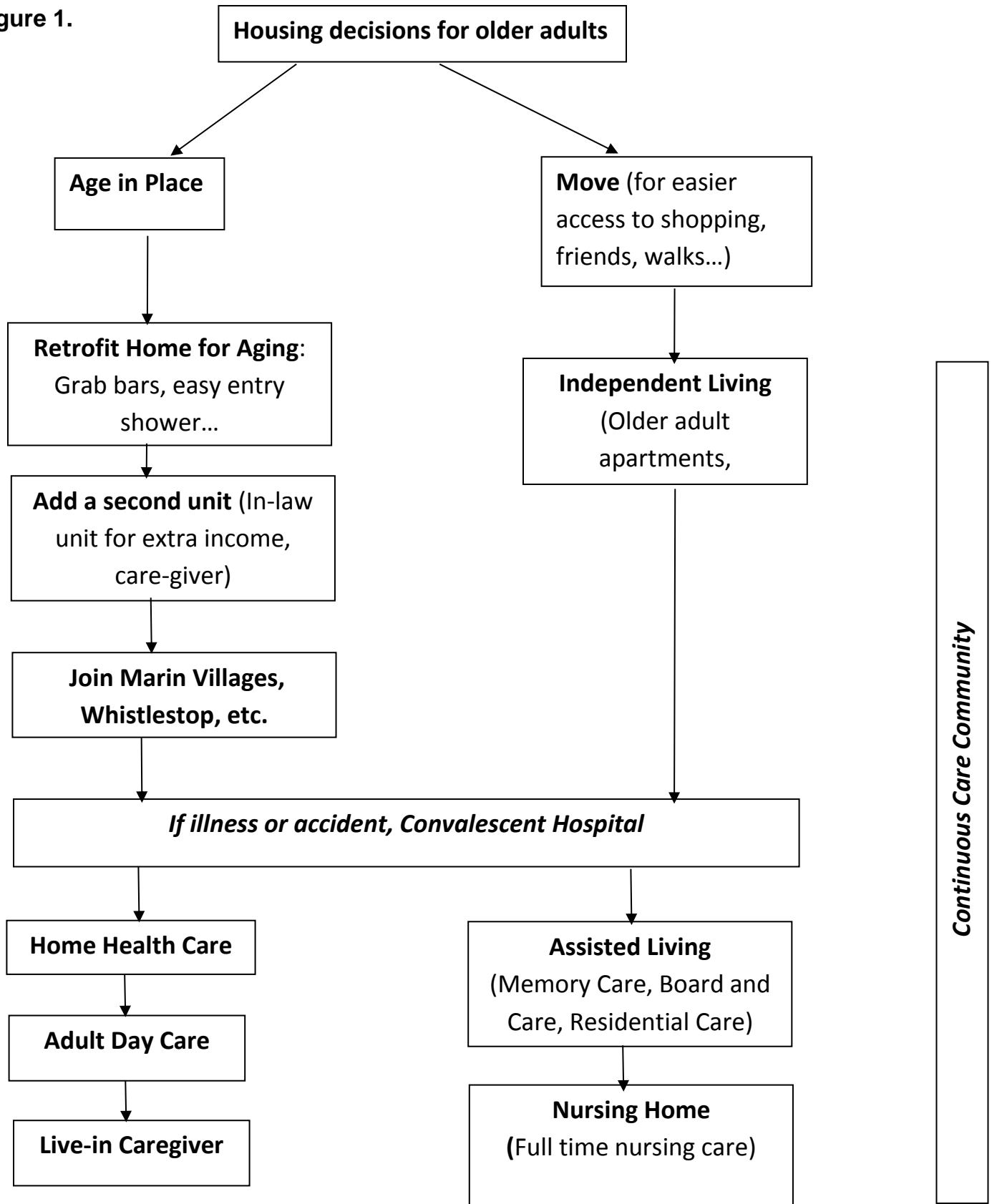
Drilling further down the decisions to “age in place”, older adults who own a home that has become too large for them should consider adding a Second Unit (Accessory Dwelling Unit or Junior Accessory Dwelling Unit) to rent for extra income, and to house an in-home caregiver if that becomes necessary. ADUs and JADUs are now encouraged by California law, and local jurisdictions are revising their ordinances to streamline applications and permit fees.

A full ADU can be freestanding and contain up to 1200 square feet, though it requires more permits and construction costs. By contrast, a Junior ADU (JADU) entails simply repurposing an existing bedroom and bathroom into a studio apartment up to 400 square feet. Construction costs are limited to amenities such as private entrance and junior kitchen to ensure privacy of both owner and renter. (Rental of an existing bedroom can also create income for the homeowner, though rules and courtesy are necessary to share bathrooms or kitchen). Because state and local law has recently been relaxed to build ADUs and JADUs, we expect this to generate much additional income for older adults, as well as create additional affordable housing in Marin.

The middle section of Figure 1 contains the unknown that everyone fears: an accident or illness that makes it impossible to live alone, at least temporarily. The US Agency for Healthcare Research and Quality reports that at age 55, the chance of being hospitalized was just 11%, but the chance rises to 26% by age 75, and rises again to 50% for those over 85.

For those who chose to “age in place”, an increasing number of programs will help them to continue in their home, including home modifications, home health care, adult day care, and a live-in caregiver if necessary.

Figure 1.



5. HOW MANY HOMES WILL NEED RENOVATION TO ACCOMMODATE THOSE WHO CHOSE TO “AGE IN PLACE”?

For those older adults who choose to stay in their own homes, some renovation will be necessary to make them safe and affordable. First, their homes may be retrofit to make them safe and accessible as their balance, vision, and reflexes decline, by adding grab bars, low-step showers, wide doors for wheelchairs, and moving the master bedroom to the first floor to avoid stairs. AARP reports in their national survey (*The United States of Aging 2012*) that only 20% of older adults have “made significant modifications” to their homes to help them age in place. The remaining 80% still need to get the permits and financing to make those modifications.

Table 5, column (a), shows the number of existing homes in each town that still need to get renovation to help them age in place. Column (b) shows the additional homes that will need those modifications by 2030. They are calculated as the 80% of older adults who have not yet made the modifications, adjusted by the 10% of older adults who will choose to move to independent living apartments, where the modifications have already been made.

Which home modifications are most cost efficient? CDC statistics show that “trip and fall” is the most common accident for people over 60 and can result in catastrophic injuries such as broken pelvis or concussions, so preventing falls is the most important goal of any home retrofit. These retrofits are surprisingly inexpensive but often ignored: adding grab bars near showers and toilets, removing trip hazards such as extension cords across floors, using non-slip rugs, and repairing uneven flooring and broken sidewalks. Medicare pays for an occupational therapist to survey the home for such hazards after any hospitalization, and local Rotary Clubs often donate grab bars and installation for older adults.

The other major home renovation in Figure 1 that will aid aging in place is adding a second unit (ADU, JADU, or room rental) to generate income, and to provide for a live-in caregiver when the time comes. Table 5 (column c) shows the number of older adult homes currently that are eligible to create a JADU. Marin older adults who own detached single-family homes (about 84% of older homeowners) can make this modification (the remainder own condos). In addition, these homeowners can only convert an existing bedroom and bathroom to a JADU, hence one-bedroom homes are ineligible, as would two-bedroom/one-bath homes, leaving 81% of owner-occupied, detached homes eligible. Table 5 (column c) shows that over 20,000 homes owned by older adults are eligible to add a JADU. Even more homes could rent a room (as a homeshare) since requirements are fewer.

Column (d) shows the additional homes owned by new older adults in 2030 that can add a JADU.

Table 5: Number of homes that will need renovation to “age in place”.

	<i>(a) 2015 older adult homes that need to be retrofit to Accessible standards</i>	<i>(b) Additional older adult homes by 2030 that will need to be retrofit to Accessible standards</i>	<i>(c)2015 older adult homes that can add a JADU</i>	<i>(d) Additional older adult homes by 2030 that can add a JADU</i>
Belvedere	399	-40	305	34
Corte Madera	1,088	448	784	661
Fairfax	874	406	644	560
Larkspur	1,866	310	951	1,096
Mill Valley	1,764	594	1,315	903
Novato	6,349	2,322	4,682	3,473
Ross	234	139	219	132
San Anselmo	1,541	615	1,143	885
San Rafael	6,368	1,884	4,191	3,571
Sausalito	1,177	253	686	659
Tiburon	1,413	242	1,090	467
Unincorporated Marin	10,688	1,015	7,660	3,346
Total Marin	33,763	8,189	23,668	15,787

Source: American Community Survey Housing Report 2015; Table 3 above.

6. HOW MANY INDIVIDUALS WILL NEED NURSING HOMES, ASSISTED LIVING, HOME CARE, AND ADULT DAY SERVICES?

As people age into the oldest age groups, they are more likely to need to live in full-time nursing care (nursing homes) or in Assisted Living facilities (when skilled nursing is not necessary but less skilled help with dressing, bathing, etc). Even for the “very old” (over 85) in California, just 7.5% currently require full-time Nursing care, 6.8% require full-time Assisted Living, 11% receive Home Care, and 1.4% receive Adult Day Services, according to the CDC’s “Long Term Care Services in the US: 2013.” We used CDC estimates of disability for each age group to calculate Table 6 below, showing the number in 2030 that are expected to need living assistance of various types.

Table 6: Living Assistance Required in 2030 by Age group

	65 to 69 years	70 to 74 years	75 to 79 years	80 to 84 years	85 years and over	Expected Total in 2030	Actual Total in 2017
Number in Nursing Homes	90	113	262	239	775	1,479	1,009
Number in Assisted Living	55	70	269	246	697	1,338	1,982

Source: CDC’s Long-Term Care Services in the US: 2013.

Note that Memory Care facilities (for Alzheimer’s and Dementia patients) are not broken out by the CDC report. However, local social workers report that there is a current deficit in Memory Care beds in Marin County, especially for difficult patients with behavior problems. As a result, many patients must be placed in Sonoma or San Francisco counties.

7. HOW MANY INDIVIDUALS WILL WANT TO MOVE TO INDEPENDENT OLDER ADULT LIVING COMMUNITIES?

Based on the AARP survey (cited in Section 5) 90% of older adults expect to age in place, and the remaining 10% expect to move elsewhere. Of these 10%, some will need to move to nursing homes or assisted living. Section 6 estimated that about 4% of older adults will do that, leaving 6% who may join independent older adult living communities, or about 2900 older adults or 1892 households will want to move to independent older adult living communities. It is surprising that only 6% of older adults in Marin want to live in independent older adult communities, because there are many advantages: reduced isolation, reduced reliance on automobiles, with reduced road congestion, increased opportunities for activities and support after inevitable deaths of loved ones. We have found (based on interviews with geriatric social workers and public talks) that many older adults are not aware of these benefits, and overestimate the difficulties of making a move and making new friends.

8. HOW MANY OLDER ADULTS WILL NEED AFFORDABLE HOUSING?

“Affordable housing” is defined by the U.S. Department of Housing and Urban Development as housing that costs less than 30% of the household’s income. We adopt their definition and use the Census Bureau’s ACS to estimate the number of older adult households that exceed that threshold in Marin. In this section we focus only on the 25% of Marin households that *rent rather than own* a home, since owners have more options to add a second unit (ADU or JADU) for additional income (see Section 6), or to secure a reverse mortgage.

The American Community Survey (S0103) reports that the average gross rent for those over 65 in Marin County was \$1590 per month in 2015. Relative to these households’ incomes, fully 58.4% of older adult renters paid more than 30% of household income in

2015, exceeding HUD's affordability threshold. The city of Novato exceeded this county average, with 70% exceeding the affordability threshold, and San Rafael had slightly less than the county average, with 56% exceeding affordability. (The ACS could not report figures for smaller cities because of small sample size, so we use the county average for those cities.) Table 8 (column a) combines this information and presents the number of older adult households whose rent exceeds HUD's definition of affordable (30% of household income), by jurisdiction in Marin for 2015. The bottom line shows that over 7,000 older adult households in Marin pay rent that exceeds HUD's affordability standard. In the next section we will compare this with the number of affordable units offered by governments and non-profits in Marin county.

The final column of Table 8 contains more uncertainty than other figures in our report, because we forecast the number of households that will require affordable housing in 2030. To do this we must estimate the income of those households and the price trend of rents, which have much higher forecasting error than any of our previous tables. Therefore we simply give a "baseline" forecast that reflects current conditions, but which can be updated if conditions change. The "baseline" forecast assumes that real rents will rise at the same rate as real older adult incomes, preserving the current percent of older adults that pay affordable rents. If rents and incomes differ from these baseline assumptions, we can revise the forecast in future years. Table 8 (column b) shows the number of older adult households in 2030 whose rent will exceed the affordability threshold in the "baseline" case. The bottom line shows that the increase in older adult households will require almost 1700 additional affordable housing units over the 2015 figure.

Table 8: Number of Older Adult Households with Rent exceeding HUD's definition of affordable, by jurisdiction in Marin.

	(a) Older Adult HHs with rent exceeding affordable level, 2015	(b) Additional Older Adult HHs with rent exceeding affordable level, 2030
Belvedere	61	-6
Corte Madera	207	85
Fairfax	154	71
Larkspur	694	115
Mill Valley	297	100
Novato	1,327	488
Ross	2	1
San Anselmo	262	105
San Rafael	1,484	437
Sausalito	361	79
Tiburon	208	35
Unincorporated	2,116	187
Total Marin	7,173	1,698

Source: American Community Survey 2015, table S0103.

9. WHAT IS THE CURRENT INVENTORY OF OLDER ADULT HOMES IN EACH CITY IN MARIN?

Appendix A lists all independent older adult housing (both affordable and market rate), nursing homes, assisted living homes, and affordable housing not designed for older adults in each city. These lists were developed from each city's Housing Element report to the state, supplemented by Marin County's 2017-2018 directory *Choices for Living: Marin Living Options for Older Adults*, and cross-checked against the lists of all properties reserved for older adults from the Marin Housing Authority and EAH Housing. The summary for each city is shown below. The first 4 columns list housing that is legally reserved for older adults or predominantly used by older adults. The last column lists affordable housing that is NOT restricted to older adults, because county housing agencies report that more than 20% of this unrestricted affordable housing is occupied by older adults. Hence this general-purpose affordable housing is an important resource for older adults seeking affordable housing.

TABLE 9: Inventory of Older Adult Homes, Marin Jurisdictions, 2017.

	Independent Senior Housing (Market Rate)	Independent Senior or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Seniors
Belvedere	-	11	-	-	-
Corte Madera	-	79	124	-	31
Fairfax	-	136	-	-	29
Larkspur	42	8	282	55	163
Mill Valley	90	207	151	58	358
Novato	611	797	239	181	665
Ross	-	-	23	-	-
San Anselmo	14	44	24	-	21
San Rafael	233	585	855	704	337
Sausalito	-	38	-	-	-
Tiburon	1	30	-	56	141
Unincorporated Marin	-	95	75	60	433
Section 8 vouchers throughout Marin	-	-	-	-	2,145
Total Marin	991	2,030	1,773	1,114	4,323

Source: Housing Elements of each jurisdiction, Marin Housing Authority, Marin Aging and Adult Services, EHA Housing.

10. FINDINGS AND RECOMMENDATIONS

FINDING 1. Marin older adults need to retrofit their homes to be more accessible, so they can age in place successfully.

Table 5 shows that the number of older adult homes that currently need renovation for older adults to age in place is over 33,000 in the county. Ninety percent of older adults plan to “age in place”, which is most cost-efficient and easiest for many. However, few have installed accessible devices such as grab bars and walk-in showers that keep them safe and make life easier as an older adult. The number of older adult households needing retrofit will increase by another 8,000 by 2030. We face a significant barrier in that 85% of older adults who want to age in place are “confident in their abilities to do so without making significant modifications to their home¹.” Such an attitude is overconfident and often results in unnecessary falls and injuries.

RECOMMENDATIONS: Education and publicity are needed so that homeowners know what accessibility options are appropriate for them. For example, 60-year olds in good health may not find that extra wide doors for wheelchairs are cost-effective now, but should install inexpensive grab bars to prevent catastrophic accidents. Further, if they are already remodeling their bathroom, widening doorways becomes cost-efficient. Sausalito Age-Friendly has developed an excellent program that distributes information on many accessibility enhancements, connects homeowners with knowledgeable contractors, and provides grants for accessibility improvement in the homes of older residents. This should be replicated in other Marin jurisdictions.

FINDING 2. Accessory Dwelling Units and Junior Accessory Dwelling Units have the potential to provide more affordable housing, and to help older residents age in place.

The rightmost columns of Table 5 show the enormous number of older adult households that are eligible to add JADUs (Junior Accessory Dwelling Units) but have not. Taking this step could contribute thousands of dollars to each household’s yearly income, provide a caregiver a place to live, decrease isolation of older adult homeowners who are living alone, and increase affordable housing in Marin.

RECOMMENDATIONS: Elected officials and non-profits can partner to contribute solutions. First, city councils can encourage ADUs and JADUs

¹ From “The United States of Aging 2012” by AARP

through streamlining application procedures and reducing permitting fees. Second, non-profits, Marin Builders Association and local planning departments can educate homeowners about how to add ADUs and JADUs to their home, and help navigate the design, permitting, construction, and tenant selection that can seem overwhelming to homeowners.

FINDING 3. Today, Marin has about the right number of skilled nursing homes and assisted living units, but has a shortage of Memory Care beds. Needs for all three may increase by 35% in 2030.

Table 6 shows the projections for nursing home and assisted living units, based on CDC data for California. In 2017 Marin had approximately the right capacity in nursing home beds and assisted living units, with ombudsman reporting about 90% capacity utilization. We note however that Marin has a current deficit in Memory Care beds to serve current dementia patients. By the year 2030, capacity for all 3 will need to expand due to the 35% increase in older adults. We are hopeful that improvements in aging research, in “telepresence” to help nurses monitor patients at home, and in robotics to aid disabled patients will make aging in place possible for more older people.

RECOMMENDATIONS: Expand Memory Care beds in Marin, monitor demand for nursing homes and assisted living units in future, and add capacity with rezoning and permit streamlining as needed.

FINDING 4. Marin has a major shortage in affordable housing for older residents.

The 25% of Marin older adults who rent their homes have fewer options than homeowners, who can increase their income with second units and reverse mortgages. Table 8 (column a) shows that in 2015, over 7,000 older adult renters in Marin were paying more than 30% of their income in rent, thus exceeding the affordability standard of HUD. Table 9 shows that this number far exceeds the 2,000 units of affordable older adult housing offered by governments and non-profits.

RECOMMENDATIONS: Several actions by governments and non-profit partnerships can contribute solutions. The first is to support construction of accessory dwelling units (ADUs and JADUs) that create low-density “affordable-by-design” housing, as proposed in Finding 2 above. The second action is to acknowledge that not all retirees can afford to live in Marin. Non-profits and others can help older adults to plan ahead and decide whether they can afford to remain in Marin, or to plan a successful retirement in less expensive locations, such as northern California, Arizona, or Nevada. A third

action is to enable higher-density housing for older residents, creating older adult housing communities. Successful examples are Marin Valley Mobile Country Club in Novato, the Redwoods in Mill Valley, and Victory Village in Fairfax. Widespread community support is needed because higher-density affordable housing has been opposed by neighbors who fear increased traffic, parking impacts, and declining home values. Non-profits, elected officials, and civic groups will need to work together to reduce these concerns and to support the approval of new older adult housing that benefits the community.

APPENDIX A: Existing Older Adult Housing Inventory by Marin Jurisdiction, 2018

	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
BELVEDERE					
Farley Place		11			
Belvedere Total	0	11	0	0	0

	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
CORTE MADERA					
A Loving Touch			6		
Aegis			109		
Aegis BMR			9		
Casa Madera (BMR)					6
Madera del Presidio (BMR)					8
Meadowcreek Station (BMR)					7
Quarry Meadows (BMR)					4
San Clemente Place		79			
The Shores (BMR)					2
Village Green (BMR)					4
Corte Madera Total	0	79	124	0	31

FAIRFAX	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Bennett House		69			
Creekwood		12			
Fairfax Vest Pocket (EAH)		1			
Live Oak					2
Piper Court					27
Victory Village (approved 2017 not built)		54			
Fairfax Total	0	136	0	0	29

LARKSPUR	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Cape Marin (BMR)					20
Drake's Way (EAH)					24
Edgewater Place (EAH)					28
King St (Homeward Bound) Approved not built yet					12
Larkspur Courts (rentals MHA)					37
Larkspur Isle (EAH)					28
484 Magnolia Ave					2
Rose Lane Older Adult Condos and Cottages (BMR and rental)	42	8			
Rose Lane 2nd units (BMR and rental)					12
Tamalpais in Greenbrae			282	55	
Larkspur Total	42	8	282	55	163

MILL VALLEY	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Alto Station Apts					17
Ashford Court (BMR)					8
Camino Alto Apts		24			
Eucalyptus Knoll I (BMR)					6
Eucalyptus Knoll II-IV (BMR)					5
Fireside Apts		32			18
Homestead Terrace		28			
Inclusionary Housing					37
Kruger Pines		56			160
Marin Terrace			49		
Mill Creek Apts		7			
Pickleweed Apts					32
Redwoods	90	60	102	58	
Shelter Hill Apts					75
Mill Valley Total	90	207	151	58	358

NOVATO	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Addison Property		1			
Atria Tamalpais Creek			116		
Bay Vista		218			
Bel Amor			6		
Brown Dr.		5			
Casa Nova (MHA)		40			
Cedars (Multiple locations)		45			
Country Villa Novato				181	
Creekside at Meadow Park					76
Creekwood Older Adult Home			62		
Dante House		6			

Deer Park	84				
Eldersly of Marin			5		
Goodrich Property					1
Habitat for Humanity					1
Hamilton Meadows 1&2					100
Indian Valley View			13		
Lamont House		6			
Los Robles Mobile Home Park	211				
Mackey Terrace (EAH)	1	49			
Margaret Green Apts		16			
Marin Valley Mobile Country Club	315				
Meadow Park					351
Michele Circle		6			
Nova Ro 1		30			
Nova Ro 2		56			
Nova Ro 3		40			
Novato Blvd		5			
Second St.		5			
Stonehaven		5			
Sundance Villa			5		
The Anton Pointe			9		
The Older Adults Villa			6		
The Villas at Hamilton		130			
Villa Entrada		67			
Walter House		6			
Warner Creek		61			
Wild Flowers 1			5		
Wild Flowers 2			6		
Wyndover Apts					136
Young at Heart			6		
Novato Total	611	797	239	181	665

ROSS	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Cedars (Developmentally Disabled only)			23		
Ross Total	0	0	23	0	0

SAN ANSELMO	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Bello Gardens		2	24		
Isabel Cook		18			
Lifehouse					5
Lincoln Park (approved not built)	14	2			
Oak Hill					13
Sohner Court					2
Tam House I and II		22			
Willow Glen					1
San Anselmo Total	14	44	24	0	21

SAN RAFAEL	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
1 H St					20
A Loving Touch			6		
Aegis of San Rafael			54		
Albert Lofts					17
Aldersly			122	20	
Alma Via			137		
Ambassador Older Adult Care			5		
Baypoint Lagoons (BMR)					8
Belvedere Place		25			
Boyd Court					7
Bretano House II, III, and IV			18		
Buckelew					4
Canal Community Alliance					12
Capri					11
Captain's Cove					4
Chapel Cove					2
Comforting Hands			6		
Country Villa San Rafael				99	
Daniel Rest Home			6		
Deer Valley Apts					26
Dorthea Mitchell					30
Drake Terrace		13	110		
Duncan Creek Apts		11			
Fairfax					39
Generations Healthcare Smith Ranch Skilled Nursing				80	
Golden Hinde		40			
Golden Home			28		
Gordon's Opera House/ Artworks Downtown					17

Habitat for Humanity					1
Hacienda Rest Home			6		
Harmony House			30		
L'Chaim House I, II			12		
Las Cassas Estates					3
Laurel Ridge					2
Long Life Living			18		
Lucas Valley Lodge			6		
Maria B. Freitas Senior Community		61			
Marin Lagoon					5
Marin Lofts					2
Martinelli House	4	62			
Meadow Oaks					13
Montevideo Terrace					2
Muir Terrace					1
Nazareth House			146		
Northgate				52	
Northview					3
Parfitt's Rest Home			6		
Parnow Friendship House (ABHOW)		72			
Pine Ridge				101	
Professional Post Acute				99	
Rafael Convalescent				168	
Redwood Village					26
Regency Estates					3
Riviera San Rafael		5			
Rose's Older Adult Care			8		
Rotary Manor (ABHOW)		99			
Rotary Valley Senior Village		80			
San Rafael Commons	5	81			
San Rafael Healthcare				54	
Schon Hyme			12		
Shalom House			5		
St. Michael's			42		
Summerhill					4

Summerhill Townhomes					39
Sunrise of San Rafael			54		
Terra Linda Christian			18		
The Gables					4
The Highlands					2
The Ridge of San Rafael					12
The Strand					17
Venetia Oaks		36			
Villa Marin	224			31	
Woodland Terrace					1
San Rafael Total	233	585	855	704	337

SAUSALITO	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Bee Street		6			
Rotary Place		10			
Rotary Village		22			
Galilee Harbor (liveaboard)					35
Sausalito Total	0	38	0	0	35

TIBURON	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Bradley House		15			
Cecelia Place Home	1	15			
Chandler's Gate					4
Marin Convalescent				56	
Point Tiburon					20
The Hilarita					101
Tiburon Hills Estates					16
Tiburon Total	1	30	0	56	141

UNINCORPORATED MARIN	Independent Older Adult Housing (Market Rate)	Independent Older Adult or Disabled Housing (Affordable)	Assisted Living (Market Rate)	Nursing Home (beds, Market Rate)	Other Affordable Housing Not Exclusively Designated for Older Adults
Adrian Terrace, Santa Venetia					3
Baywood Canyon, Fairfax					3
Blue House, Pt. Reyes					2
Braun Court, Marin City					22
French Ranch, San Geronimo					3
Golden Gate Village, Marin City					296
Headlands II, Marin City					19
Kentfield Court, Kentfield					2
Kindred Nursing, Greenbrae				60	
Marin City Townhomes					34
Mesa Apts, Pt. Reyes					4
Point Reyes Affordable		22			
Ponderosa Estates, Marin City		11			45
Sam's House in Bolinas			6		
Sam's House North in Tomales			6		
Stockstill House, Pt. Reyes Station			8		
Toussin Senior Apts, Kentfield		13			
Village Oduduwa		25			
Walnut Place, West Marin Senior Housing, Pt. Reyes		24			
Windchime, Kentfield			55		
Unincorporated Marin Total	0	95	75	60	433

APPENDIX 2: Modeling Methodology for 2030 Forecasts of Older Adult Population in Marin Cities

Michael R. Hagerty, Professor Emeritus, UC Davis

The California Department of Finance (DOF) provides authoritative estimates for population in Marin County through 2060, but they do not forecast individual cities' growth in Marin. Individual cities and planning boards need these forecasts because they must make decisions on housing to prepare for that future, especially since DOF forecasts a 37% surge in older adults over age 60 in Marin by 2030. DOF does not produce forecasts at the city level, but we can use their methodology to extend their forecasts to the city level.

DOF uses the classical demographic model use (at http://www.dof.ca.gov/Forecasting/Demographics/Projections/documents/Methods_01_Report_v12_Revised.pdf)

$$N_{t+1} = N_t + (B_{t,t+1} - D_{t,t+1}) + (I_{t,t+1} - O_{t,t+1})$$

Where the number of people N in each cohort in the next year $t+1$ is the number in the previous year t , plus births, minus deaths, plus net migration during that year. Since we are considering people over age 60, the Births term is zero. In addition, net migration into Marin County is very low. DOF forecasts net migration as just 750 people per year over the next 30 years, or .3% of Marin's population. (See "Components of Change" at <http://www.dof.ca.gov/Forecasting/Demographics/Projections/>)

Therefore we ignore net migration as a minor factor in forecasts for older adults in 2030, and the two remaining factors are N (the population at time t) and D (the death rate for each age group). The CDC's Vital Statistics (Nov 28, 2016) reports national age, sex, and race-specific mortality rates based on over 2.5 million death reports. We are currently requesting DOF to supply the Marin-specific mortality rates. If we had error-free estimates of population size by age in each Marin city, we could combine these for very precise death rates. However, the Marin County Epidemiology office points out that age, sex, and race-specific population estimates have high standard errors in mid-decade because of sampling error since 2010. To reduce the standard error of forecast, we simplify to apply the age-specific mortality rates to 5-year population age cohorts reported in ACS 2015 and ignore sex and race-specific data which have much higher standard errors. The resulting 90% confidence intervals are given in the ACS, and are reported in Tables 1 and 2.

Our method results in close agreement with DOF's county-wide growth forecasts for older adults: they predict a 37% increase in older adults in 2030, whereas our forecasts predict a 35% increase.

GLOSSARY

ASSISTED LIVING FACILITIES (ALF)

There are over 28,000 assisted living communities in the US. Assisted living is a housing option for older adults who cannot live independently and need help with medications and daily living activities, such as bathing, grooming, eating, dressing and going to the bathroom. Assisted living facilities are referred to as ALFs in the older adult living industry.

ADULT DAY CARE

[Adult Day Services](#) offer structured programs with stimulating social activities, health-related and rehabilitation services for older adults who are physically or emotionally disabled and need a protective environment during the day. Participants are usually brought to the center in the morning and leave in the evening.

AGING IN PLACE

A concept that advocates allowing a resident to choose to remain in his/her home regardless of the physical and/or mental decline that may occur with the aging process.

BOARD AND CARE HOMES

Board and care homes typically provide older adults with the same services available in larger assisted living communities; the difference is that these facilities are "regular" houses in residential neighborhoods that are equipped, adapted and staffed to care for a small number of older adults. The term "board and care home" is most commonly used in [California](#). In other states, these homes may go by other names including "[residential care homes](#)" or "group homes."

CONGREGATE HOUSING

Congregate housing is similar to Independent Living, except that it usually offers supportive services such as meals, housekeeping and transportation.

CONTINUING CARE RETIREMENT COMMUNITY (CCRC)

A community that offers several levels of assistance, including independent living, assisted living and skilled nursing care. These communities usually offer long-term contracts or written agreements between the resident and the community which offer a continuum of housing, services and health care system, usually all on one campus or site.

CONVALESCENT HOME

A convalescent home is generally where a patient can recover from an illness or injury with short-term care and then return home.

HOME HEALTH CARE

Provision of medical and nursing services from licensed providers and professionals in an individual's own home.

HOSPICE CARE

Philosophy and approach to providing comfort and care at end of life rather than providing heroic lifesaving measures. [Hospice care](#) can include medical, counseling and social services. Most hospice care is in-home, while specialized hospices or hospitals also provide these services.

INDEPENDENT LIVING

Independent living is when an elderly person still has the physical and mental capacity to live independently but wants companionship from others his/her age. Independent living offers specific services and amenities that cater to older adult citizens and promote active, healthy older adult lifestyles for the golden years. Independent living is not an option for someone who cannot care for him/herself.

INSTRUMENTAL ACTIVITIES OF DAILY LIVING (IADLS)

Unlike Activities of Daily Living, which are necessary for fundamental functioning, IADLs are not necessary and are the activities that let an individual live independently in a community, such as transportation and paying bills.

NURSING HOME

Facility licensed by the state that provides 24-hour nursing care, room and board, and activities for convalescent residents and those with chronic and/or long-term care illnesses. One step below hospital acute care. Regular medical supervision and rehabilitation therapy are mandated to be available, and nursing homes are eligible to participate in the Medicaid program. May be referred to as Nursing Facility or Convalescent Home. See also Skilled Nursing Facility.

RESIDENTIAL CARE HOMES

Residential care homes offer personalized service to small groups of adults. These homes provide lodging, meal services and assistance with daily living activities. Other terms include adult family homes, board and care homes, or personal care homes.

RESPITE CARE

Temporary relief from duties for caregivers, ranging from several hours to days. May be provided in-home or in a residential care setting such as an assisted living facility or nursing home.

OLDER ADULT APARTMENTS

Older adult apartments refer to age-restricted multi-unit housing with self-contained living units for older adults, usually aged 55+ who are able to care for themselves. Older adult apartments do not offer additional services such as meals or transportation.

UNIVERSAL DESIGN

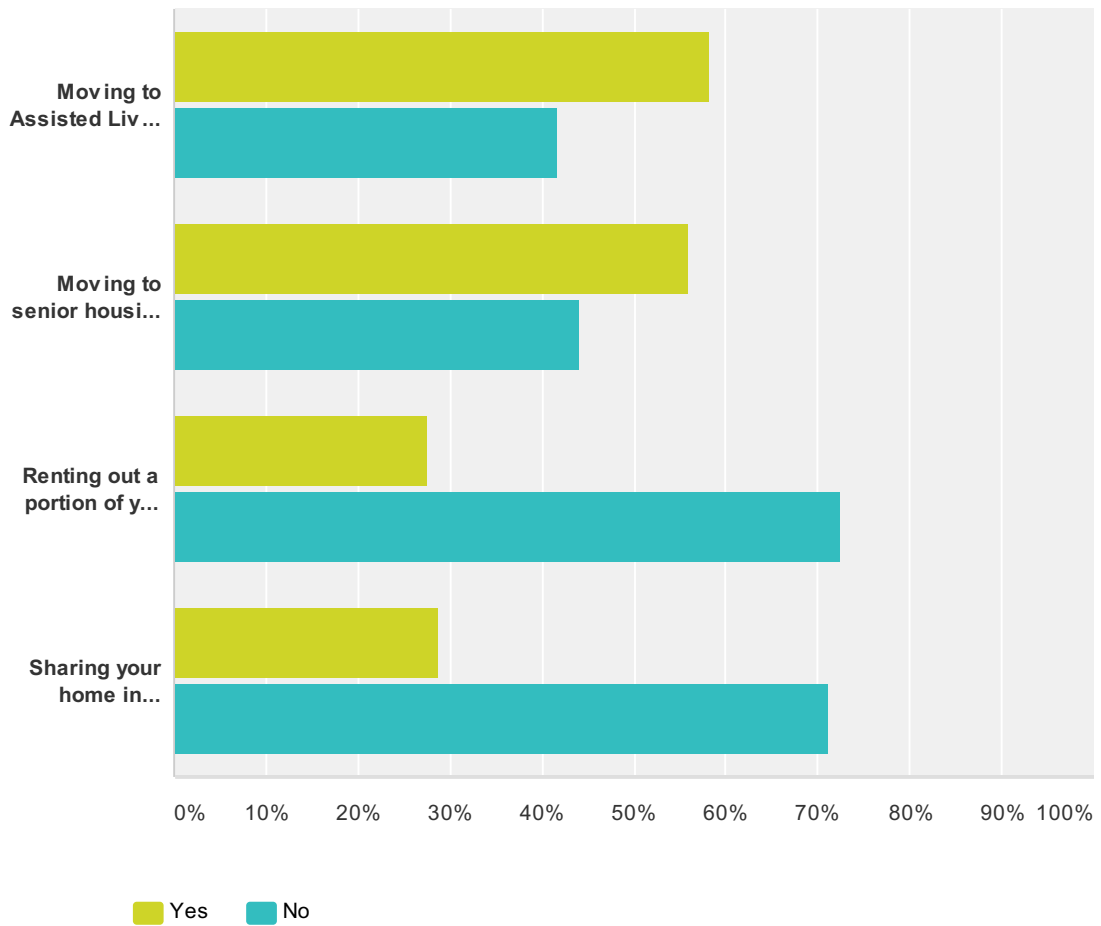
Universal Design refers to broad-spectrum ideas meant to produce buildings, products and environments that are inherently accessible to older people, people without disabilities, and people with disabilities.

From "A Place for Mom" website: <http://www.aplaceformom.com/older-adult-care-resources/articles/glossary-of-terms>

Age-Friendly Sausalito Questionnaire

Q23 Would you consider any of the following now or in the future?

Answered: 1,151 Skipped: 39



	Yes	No	Total
Moving to Assisted Living if it were in Sausalito	58.29% 615	41.71% 440	1,055
Moving to senior housing in Sausalito	55.95% 602	44.05% 474	1,076
Renting out a portion of your home to a boarder/tenant	27.55% 284	72.45% 747	1,031
Sharing your home in exchange for help around the house	28.83% 292	71.17% 721	1,013

From: Tim Walch <twalch@me.com>
Sent: Monday, December 2, 2019 8:54 AM
To: info@sausalitogeneralplan.org; bmeeker@sausalito.gov
Subject: Comments on Sausalito General Plan Update

Dear Bill-

Sorry for the delay in this correspondence, I hope the comment window is still open.

Renting at 15 Gordon Street and looking for a place to live in Sausalito has made me very aware of the need for more housing, full stop. Getting to know the demographics, push and pull between residents and visitors and need for a forward-looking plan has been interesting; below are my thoughts.

-Encourage mixed use in commercial corridors, specifically residential with no parking requirement or reduced parking requirements. (This simple zoning change has proven successful in supporting local merchants, adding low impact residents and providing affordable housing.)

- Continue to dedicate resources to encourage safe bicycle traffic along the water and with proximity to parking and local businesses.

- Marinship:

* Create "historic" designation for current qualifying buildings that can then use tax credits for rehabilitation.

* Establish non-automotive paths through the area (walking, bicycle, other modes) for community and visitor access

* Allow housing targeted for the elderly (independent, assisted and memory care) plus micro apartments (400 sq ft or less) with limited parking.

Thank you for your efforts in hearing residents' ideas.

Tim

December 4, 2019

Mr. Bill Meeker, Planning Advisor
Community Development Department
City of Sausalito
420 Litho Street
Sausalito, CA 94965

Re: Comments on the Scope and Content of the Program EIR
City of Sausalito General Plan Update

I'm not sure if the EIR will get into this level of detail, but one of the Programs under the topics of waterfront, downtown or other Policies will be an expanded Community Plaza at the Ferry Landing. This would entail a long range concept, with the current "landside improvements" being the first phase.

In the event this is to be examined, it's important to know that there will likely be mitigation of any loss of parking spaces due to such a plan. The Sausalito Yacht Harbor is considering converting a portion of their nearby parking lot to daily paid parking. This would more than mitigate any loss of convenient spaces in the City lot.

Thank you.

Peter Van Meter
4 Cloud View Circle
Sausalito, CA 94965
(415) 699-2739 (cell)
mycre@pacbell.net

From: [Tre Balchowsky](#)
To: [Bill Meeker](#)
Subject: EIR questions for General Plan Update
Date: Friday, December 06, 2019 5:06:18 PM

CAUTION: External Sender

Hello,

I'm writing in regards to the public commenting period for the General Plan Update for EIR questions. There doesn't seem to be an actual proposed plan to comment on specifically so my comments are directed to any and all plans put brought to the planning commission or city council.

How will the changes in the General Plan be affect the need for public transportation in Sausalito, from Marin, San Francisco and the East Bay?

What municipal transportation departments will be involved in offsetting increase in traffic with increase in usable public transpiration?

Will there be a ferry from Oakland, Alameda, and Richmond provided in this update to offset increased people coming into Sausalito?

How will minimum wage be addressed for the new jobs created by the new general plan?

How will increased traffic be dealt with? Gate 5 Road is already experiencing a dangerous increase in speeding traffic, how will traffic volume, speed, and pedestrian/cyclist safety be handled?

Where will additional cars park?

How will the general plan update affect air quality?

With more vehicles we will have more smog and more lingering toxins especially during commute hours, how will these be abated?

How will this update affect the many natural springs and the animals that rely on them?

How will native species be affected or utilized in the plan?

Our waste water treatment plant already overflows, how will more until affect the facilities ability to keep up? What is the cost associated with updating and increasing the volume of this plan?

What is the impact of increased car, foot, and cycling traffic on wildlife?

The Mission Blue Butterfly is already an endangered species, how will the update to the plan affect its ability to survive and rebuild it's population?

How are school children getting accounted for in this process? Not just their access to classrooms but their future as citizens of Sausalito as sea level rises?

What methods are being employed for sea level rise abatement? Have the latest technologies coming out of Holland and Venice been evaluated? If not, why?

How is power being provided? PG&E has proved ineffectual in providing consistent power. How will the lives and

livelihoods of those living under the new general plan be protected through consistent power?

Will renewable energy be used? If so, what kind?

How are invasive species being accounted for and mitigated in this plan?

How will this plan affect the citizens of Sausalito's ability to have a boat in Sausalito and have it serviced in Sausalito?

Kindly,

Tre Balchowsky

From: [charles kaufman](#)
To: [Bill Meeker](#)
Subject: NOP questions
Date: Friday, December 06, 2019 11:47:55 AM

CAUTION: External Sender

NOP comments from public:

- What will be done to mitigate noise impacts when the GP is updated?
- How will traffic increases and rates be dealt with to make Sausalito safe for pedestrians and children?
- What will be done to retain the Marinship Industrial capacity in light of Climate Change?
- How will toxicity of soils in areas along the Bay and in Marinship be identified and addressed?
- What will be the consequences of any changes in zoning to allow more business activity on residential access to services and amenities now available on Caledonia St?
- How will the negative impacts of tourism be addressed which regard to environmental and safety issues caused by tourists?
- How will bike safety be enhanced when GP is updated?
- How will hillside stability be determined and addressed in the updated plan?
- What will be done to mitigate fire risks when the plan is updated?
- What vegetation control measures will be identified and how will they be dealt with to address environmental and aesthetic issues when plan is updated?
- How will citizen safety in the event of an emergency be addressed in the GP update?
- How will Marinship marine services and support businesses be supported by the updated GP?
- How will air quality be maintained to insure health impacts do not occur in the GP?
- What provisions will be made to insure drinking water is safe from chemical ingredients for citizens?
- How will infrastructure repair and replacement be identified and addressed in GP update?
- How will height limits on Buildings be addressed?
- How will residential neighborhoods be protected from incursion by business activities such as Short Term Rentals, home based business activity?
- How will Senior services be provided to the aging population in Sausalito?
- What recreational provisions will be identified and supported in the updated GP.
- How will public safety issues be addressed in the updated GP.
- How will new technology such as 5G, drone delivery, autonomous vehicles, etc. be addressed in the updated GP.
- How will public transportation be addressed in the update to insure ease of use and affordability for citizens?
- What changes in traffic circulation will be made to enable safer streets and sidewalks?
- How will publicly designated space be protected from development/
- How will local businesses be retained and supported in the GP update?
- How will neighborhood character be protected from inappropriate changes by development activity?
- How will sea level rise be addressed in the GP?
- How will playgrounds be made safe for children"
- What provisions will be made to address impacts of pets on the environment?
- How will natural streams be protected in the plan?
- How will bay waters be protected from city run-off and other contamination?
- How will undergrounding of utilities be addressed in the plan with regard to environmental issues?
- How will the plan promoted environmental safety and enhance the appearance of city streets?
- How will school transportation routes be made safe and accessible for children?
- How will risks of soil movement be address in the updated plan?
- What will be the provision to address lighting on streets and public property?
- How will increased housing impact air quality, noise pollution and sewer treatment capacity?
- How will dangerous trees be addressed in the plan to reduce fire and toppling risks?
- How will operation of water taxis or "tour boats" be addressed in the updated Plan?
- How will eliminating natural gas in future development projects be balanced with power outages for citizens during fire or storms?
- How will wildlife be protected in the plan update?

How will the bay be protected from impacts of boating, live-abords and other marine activity?

What mitigation efforts to address sea level rise be take and how will this impact environment?

How will the plan insure access for emergency vehicles, fire fighting equipment, and police be able to transit hill side areas?

What will be the impact of fire safety improvements that alter vegetation in Sausalito?

The above questions are submitted by:

Charles Kaufman

68 Cypress Place

Sausalito, CA 94965

Ph: 415-729-9599 email: kpckaufman@earthlink.net

From: [Sonya Hammons](#)
To: [Bill Meeker](#); [Mary Wagner](#)
Subject: Request for responses to EIR questions
Date: Saturday, December 07, 2019 12:38:53 AM

CAUTION: External Sender

Dear Bill Meeker,

My name is Sonya Hammons and I am a Sausalito resident at [REDACTED]

I would like to receive information on the public input process for the environmental impact review of the general plan update process.

In addition to this request for information on what the process is for public input on the environmental impact review, I would like to ask for responses to the following questions. Please see questions below.

I look forward to your response to these specific questions and further information on the process for public input on the EIR.

Thank you very much.

Sonya Hammons

[REDACTED]
Sausalito CA 94965
[REDACTED]

If the marinship specific plan is superseded by the general plan and other zoning/uses considered for that area, what mitigation measures would be required to address contamination in the marinship area that would negatively affect those uses (such as housing or commercial or recreational)?

What mitigation measures would be needed to address flood risk in the marinship area? Would the flood risk pose a long term threat to residential development?

Is use of floating or portable structures being considered as an alternative option of development to mitigate flood and earthquake risk?

What short and long term compatibility risks may emerge if residential and commercial uses are sited alongside industrial uses such as boatyards? For example, noise pollution, particulate matter in the air, and proximity to paint containing lead or carcinogens. How will these risks be mitigated?

How would liquefaction risk be mitigated for new construction in the marinship area?

What measures would need to be in place to mitigate impact of noise and hazardous materials stemming from light industrial uses in order to be compatible with other possible uses such as housing or restaurants?

If the marinship specific plan is dissolved and other land uses allowed in the marinship area, what could be the compatibilities and incompatibilities of those uses with Sausalito's sustainability planning?

The marinship area is at high risk of flooding, earthquakes, and is a site known to be contaminated with toxins. What would the city's financial and legal liability be for damage to public and private property as well as environmental health and hazard impacts on human health associated with these risks?

How would housing and retail be compatible with recommendations from BCDC and others that housing not be developed in areas vulnerable to sea level rise?

Are there any other possible sites for development other than marinship that may be better suited to residential and retail development? Will this analysis be presented in meaningful detail?

NOP Comments – Sausalito General Plan

General

- Given that the Sausalito Sanitation District is under an EPA consent decree, why aren't EPA and CalEPA on the distribution list?
- Does the general plan update raise federal air quality concerns?
- Does the general plan update raises concerns regarding historical resources?
- Why wasn't EPA Region IX included on the distribution list?
- Some of the protected species are federally listed - why isn't Federal FWS being provided information to comment, especially since wetlands are regulated under the federal CWA?
- CalTrans is involved in the slide cleanup on Sausalito Blvd; why weren't they on the distribution list?
- The General Plan specifically discusses disaster preparedness; accordingly, FEMA should be given notice.
- Sausalito has risks associated with liquefaction, subsidence and earthquakes; why wasn't USGS provided notice?
- Please explain why these other agencies were not included on the distribution list:
 - Bureau of Indian Affairs
 - NOAA
 - CARB (air quality concerns)
 - DWR (water resources)
 - CA Energy Comm / CPUC (undergrounding and disaster preparedness)
 - CA Coastal Conservancy (waterfront preservation and access)

Air Quality

- Air quality analysis should be performed in accordance with the BAAQMD CEQA Air Quality Handbook using the California Emissions Estimator Model (CalEEMod)
- In the event that the proposed project generates significant adverse air quality and health risks impacts, the General Plan Update should consider alternatives to reduce these impacts.
- CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. How will this update accommodate this requirement?
- In the event that the proposed project requires a permit from BAAQMD, BAAQMD should be identified as a responsible agency for the proposed project.

Circulation

- The project should be evaluated for consistency with the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Traffic patterns in peak and off-peak hours should be considered
- Alternatives to vehicle transport, such as water based taxis, should be included in the alternatives section
- The impact of autonomous vehicles should be included in the impacts section

Water Quality

- The project should provide evaluation of potential impacts to wastewater and storm water systems
- The project should evaluate impacts to infrastructure such as sewage and runoff
- The project should be consistent with the “City of Sausalito Urban Runoff Pollution Prevention Ordinance”
- The project should evaluate whether NPDES permits will be required
- The project should present and explain any pending enforcement actions related to water quality, and present mitigation measures to avoid non-compliance
- The project should include an inventory of infrastructure needs in order to adequately explain any impacts and associated mitigation measures

Land Use

- The project should consider the impacts of siting incompatible land uses (such as placing housing near industrial uses).
- The project should identify any PCB or other contamination within Sausalito, including any federal or private studies.
- The project should consider alternatives if such contamination is found.
- The project should include an inventory of historic landslides throughout town and support programs that lead to a Hillside Ordinance in the zoning code.
- The project should consider an alternative to land use in the Marinship that involves greater enforcement and/or restrictions such that the majority of use in the zoned Industrial section is in fact an industrial use.
- Economic studies included after conclusion of the EIR process should not be allowed to amend the General Plan unless a full CEQA process is conducted on that analysis and its impacts and alternatives.
- Economic potentials should not override the character of these areas and must be considered when balancing both the quality of life for the Sausalito community and economic sustainability. How will the alternatives presented make sure to mitigate this concern?
- The 1995 General Plan contains several strong protections for historic preservation that should be retained.

- Objective 4.0 “Preserve the Character of Community Sub Areas” lists specific characteristics (CD4.2) calling out the Downtown, Caledonia Street, Central Waterfront, Downtown Waterfront, Southern Waterfront and Marinship subareas. How will this be maintained in the updated plan?
- CD-7.0 Respect and Maintain Exterior Integrity of Historic Structures and Sites. Particularly CD-7.2.3 states, “Publication. Consider a City supported preparation of a pictorial publication of significant Sausalito structures. How can historical preservation be addressed in the absence of a Citywide Inventory of Sausalito structures? Preparation of a Citywide Inventory of Sausalito structures should be included as an Objective or Program in the updated General Plan.”
- The land use section should include a recommendation on senior housing in publicly owned spaces such as the corporation yard.
- There is no mention of sea level rise. The General Plan should address and provide programs and policies to preserve a resilient waterfront in the face of sea level rise, and promote sustainability measures to enhance and preserve our waterfront.
- Land use policies that are resilient and promote the sustainability of our community are essential and should be included in the alternatives analysis.

Disaster preparedness

- The project should have a separate element focused on climate change resiliency and should include at the least a section on sea level rise.
- Was the Sea Level rise analysis developed by the SF Estuary Institute included as a background study; why or why not?
- What type of science-based framework for developing adaptation strategies that are appropriate for the diverse shoreline of the Bay and that take advantage of natural processes were utilized during development of a land use or other strategy for sea level rise?
- What are the negative impacts of a sea wall?
- Does the project adequately evaluate alternatives to a sea wall?
- The project should include sea level rise mitigation measures to include wetlands, estuaries and other naturally occurring biological elements.

Sustainability

- State Senate Bill 1383 approved in 2016, calls for a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 levels by 2020 and a 75 percent reduction by 2025. It also calls for a 20 percent reduction in edible food waste. Another bill passed in 2011, Assembly Bill 341 set a goal of 75 percent of solid waste generated being source reduced, recycled, or composted by 2020. The updated plan should include specific programs and policies to align with these state mandates.
- San Anselmo recently adopted a very aggressive 2030 Climate Action Plan, which touches on issues of waste as well as energy efficiency and several other crucial climate change mitigation measures. Similarly, the

City of San Rafael's General Plan includes a section subtitled "Sustainability" which provides: *The Sustainability Element is San Rafael's guiding strategy to actively adapt to ongoing changes within the community and in the environment. In concert with other elements within the General Plan and with the City's Climate Change Action Plan, it defines the City's goal of becoming a sustainable community by providing stewardship of our shared natural resources, creating economic resilience, and contributing to the social well-being of its citizens.* Sausalito's General Plan should include a similar vision and alternatives analysis.

- The updated General Plan must include language surrounding preparing to mitigate the impacts of climate change. This goes beyond simply "environmental risk" and needs to be included.

From: [John DiRe](#)
To: [Bill Meeker](#)
Subject: NOP Comments
Date: Monday, December 09, 2019 12:36:48 AM
Attachments: [NOP Comments2.docx](#)

CAUTION: External Sender

Bill attached are some comments regarding environmental issues and alternatives that should be addressed in the program EIR. I may have a few others before the Dec 9, 5pm deadline.

I know you have had email issues. Please reply to this email to confirm its receipt.

Thank you,

John DiRe

- a. Will the City of Sausalito solicit an additional process of addressing new proposed environmental impacts after the actual plan is proposed so that the public can provide additional comments regarding environmental issues and alternatives?
- b. What are the impacts of any seawall as a potential mechanism to sea-level rise mitigation? Water quality? Erosion? Fish and Wildlife? Waterfront Access? Wetlands?
- c. What is the potential impact of additional housing in Sausalito in terms of sewer capacity, traffic congestion? School enrollment? Power grid capacity? Water usage?
- d. What role can check valves play in holding back sea-level rise/high tide/storm surges? Is water quality affected? Is air quality affected by water odors?
- e. What is the impact of eliminating natural gas as a heating source? Cost? Increase to electrical grid?
- f. Would increased vehicle circulation routes in the Marinship bring even more vehicle miles traveled into Sausalito assuming during rush hour Hwy 101 overflow is unlimited (more Sausalito circulation would drive more HWY 101 traffic onto Bridgeway via mobile apps like Google Waze)?
- g. What is the inventory of trees in Sausalito including invasive species like blue gum eucalyptus? What is the correct balance between tree removal for fire safety and tree planting for aesthetic beauty? For native species?
- h. GGNRA has multiple natural springs that eventually make their way to the bay. These springs appear and disappear throughout Sausalito. What are the importance of these springs to local wildlife? Bay aquatic life? How will new development affect these resources? Marin Headlands contains one of the last colonies of the endangered Mission Blue butterfly. The new Willow Creek Open space has been planted with native species to attract these butterflies to Sausalito. The Department of Fish and Wildlife should be involved in identifying the presence of these butterflies in Sausalito Open spaces including the Marinship at open spaces near Marina Plaza (2320 Marinship Way #160)
- i. The Sausalito hillside was an actively mined for minerals such as manganese in the late 19th and early 20th century. These mine tunnels still exist and are mostly covered, some with metal doors. In some cases, they are adjacent to natural springs. An investigation of mine tailings may be required before any circulation changes or new development takes place. California Water Resources Control Board and the Bureau of Land Management should opine on any concerns.
- j. Will the FAA examine and propose safety guidelines regarding drone package delivery in Sausalito, especially in conjunction with our local seaplane business? Same question regarding single-passenger taxi drone as in other seaside communities per September 2019 SFGATE article? FAA should opine.
- k. Will water taxis be considered? What is the environmental impact in terms of fish and wildlife resources including the fragile herring ecosystem, eel grass, potential oyster beds seals, and sea lions. California Department of Fish and Wildlife should opine
- l. If the General Plan Update plans for 1.67 feet of sea level rise by 2040, should the accelerated pace of that rise well above 1.67 feet after 2040 (6ft-10 ft projected) be planned for? Or ignored?
- m. BCDC does not recommend residential developments in areas vulnerable to sea level rise. Instead they recommend temporary and more easily moveable and less disruptive

industrial buildings and business uses be adopted. Should Sausalito ignore this and go its own way? BCDC should opine.

- n. Any residential development or use in the Marinship that housing located near toxic and hazardous waste dumps or collection and processing services and housing located on landfill/bayfill must comply with new federal regulations. The FHA announced a new approval process to insure mortgages on individual units in condominium projects under Section 203(b) of the National Housing Act in accordance with the passage of the Housing and Economic Recovery Act (HERA) of 2008. The FHA states, in Item IV. General Requirements, D. Environmental Review Requirements, that "...the lender must avoid or mitigate the following conditions before completing its review process....The property is located within 3000 feet of a dump or landfill, or of a site on an EPA Superfund (NPL) list or equivalent state list, or a Phase I Environmental Site Assessment indicates the presence of a Recognized Environmental Condition or recommends further (Phase II) assessment for the presence of contaminants that could affect the site...." California Department of Insurance should opine on potential problems.
- o. The Marinship property has in past studies already been found to contain PCBs, lead, benzene, TPHd, POG and other contaminants. Other locations in the Marinship have not yet been tested and remain a potential severe hazard. The presence of World War 2 ship building activity typically involved dumping toxics into pits dug into the ground. Most pits are today hidden but some capped with concrete are still visible per local historians. RWQCB should be contacted.
- p. World War 2 era (and pre-WW2) railroad tracks remain throughout the Marinship. The Surface Transportation Board, an adjudicatory body of the U.S. Department of Transportation should be contacted regarding any projects that require track removal.
- q. Increased land use and any development should require that the PUC and PG&E be notified as well as CARB (California Air Resources Board). Further the increased burden on Sausalito's water treatment plant must be determined.
- r. Cultural resources may be impacted including previously identified or unidentified cultural or paleontological resources or human remains for pre-World War 2, World War 2 and post-World War 2. This is especially true of the mostly intact shipways and shipways builds that are still in operation use today as well as the WW2 shipways buried under the Marina Plaza property at 2320 Marinship Way #160. California State Historic Resource Commission, the State Office of Historical Preservation should be contacted.
- s. Tsunami risk for any shoreline development should be assessed by FEMA. Furthermore if any residential development is proposed near the shoreline, a tsunami (or earthquake) evacuation plan should be determined to provide adequate procedure to evacuate in a timely manner. If senior housing is proposed, public safety (police and fire department) should identify the evacuation plan and the personnel that would be responsible for the evacuation in the appropriate amount of time.

TO: Bill Meeker, Planning Advisor, City of Sausalito

FR: Craig Merrilees, citizen

RE: Comments on Environmental Impact of the General Plan Update

DT: December 9, 2019

Notwithstanding the impossibility and absurdity of submitting comments regarding the environmental impact of a General Plan Update that doesn't yet exist, I offer the following comments and questions.

RE: traffic, congestion and air pollution

1. Is the City prepared to evaluate the impact of additional automobiles and vehicle trips that would increase if the *Marinship* area is up-zoned to allow housing, more commercial and retail?
2. Will the City evaluate the impact of increased automobile traffic in terms of increased air pollution, measured on a daily and hourly basis, with special emphasis on high-traffic period during peak tourist seasons and morning/evening rush-hours, on major routes, including but not limited to Bridgeway, and will the added air pollution from traffic congestion be included in your analysis?
3. Will the City extrapolate the specific impact and risk posed by increased automobile traffic and resulting air pollution, on all residents but with specific impacts on sensitive populations of infants and children, the elderly and those with cardio, pulmonary and other vulnerabilities?
4. Will the City provide an accounting, with a suitable weighted average, to account for larger, heavier, more expensive and less fuel-efficient automobiles favored by wealthy drivers who would occupy the overwhelming number of market-rate residences if up-zoning allows residential development in the *Marinship* area?

William Arno Werner
213 Richardson Street
Sausalito, CA 94965-2422

December 9, 2019

Mr. Bill Meeker, Planning Advisor
Community Development Department
City of Sausalito
420 Litho Street
Sausalito, CA 94965-1933

SUBJECT: Notice of Preparation of a Program EIR, October 16, 2018
City of Sausalito General Plan Update
Public Scoping Comments

Dear Mr. Meeker:

Please ensure that the following public comments on the “*scope of the environmental issues to be addressed in the Program EIR, as well as the range of alternatives to be evaluated*” receive a “*good faith, reasoned analysis*”.

Purpose of this Notice

At the time this NOP was issued, there was no Draft General Plan available for public review. There was not even a summary of the proposed Elements and their respective Objectives and Policies. There was no reference to “Probable environment effects of the project” as required by the CEQA Guidelines:

15082. NOTICE OF PREPARATION AND DETERMINATION OF SCOPE OF EIR

(a) Notice of Preparation.

(1) The notice of preparation shall provide the responsible and trustee agencies, and the Office of Planning and Research, and county clerk with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response. At a minimum, the information shall include:

(A) Description of the project,

(B) Location of the project (either by street address and cross street, for a project in an urbanized area, or by attaching a specific map, preferably a copy of a U.S.G.S. 15' or 7-1/2' topographical map identified by quadrangle name), and

(C) Probable environmental effects of the project.

(CEQA Guidelines 14 CCR § 15082(a)).”

There was nothing upon which “meaningful responses” could be based. This lack of relevant information makes it well-nigh impossible to formulate responses and comments that are specific and relate directly to the project. The comments, to which I am entitled to receive a full and reasoned response, have been made as specific as possible given the lack of information, facts or evidence upon which to opine.

In some cases, a general response may understandably be all that is possible when a comment could not contain or specifically refer to information not readily available, or could not explain the relevance of the comment because no supporting evidence was provided. In order to comment on the substance of the “Scope” of the Project, it would have been helpful to know what actual Scope was being considered.

Project Description

The Sausalito Notice of Preparation of a Program EIR dated October 16, 2018, in the third paragraph on page 3, the following conclusory statement, unsupported by any factual information, evidence, reference, or source:

"The Marinship Specific Plan will be superseded with the adoption of the City of Sausalito General Plan Update." NOP, page 3.

The magisterial pronouncements of a City Council member and the support of a handful of property owners and others with vested interests in lifting the constraints of the MSP does not constitute a legitimate due process leading to the abandonment of the MSP. It cannot simply be "retired" or made to disappear as some have suggested.

The Marinship Specific Plan was adopted on April 5, 1988, by City Council Resolution 3708. It was amended on May 2, 1989, by City Council Resolution 4313. The Zoning Ordinance was amended on May 2, 1989, by City Council Resolution 1047 to incorporate the policies, standards and regulations of the MSP. The MSP had two very simple statements of "General Intent":

1. *To promote the waterfront area and promote water-dependent uses.*
2. *To promote the development of other lands in the Marinship with industrial uses and uses compatible with an industrial area.*

These were supported by 21 Goals. The MSP was incorporated throughout the 1995 General Plan, adopted on September 19, 1995, by references such as:

"Marinship Specific Plan. Continue to apply the policies in the Marinship Specific Plan and the zoning ordinance as they pertain to the Marinship." 1995 General Plan

It should be noted that the City of Sausalito Ordinance No. 1022, "The Fair Traffic Initiative", was passed by the voters and adopted by the City in 1985, three years prior to the adoption of the MSP. It was aimed at preserving the maritime character of the City. It reduced the maximum floor area ratio permitted for new developments and prohibited changes to zoning or uses that would result in increased commercial usage or density (thereby increasing vehicle traffic generation). It can only be superseded by the voters in an election.

There has been no formal action by the City Council to retire, abandon, or supersede the Marinship Specific Plan. Therefore, the MSP, along with the Zoning Ordinance and Ordinance 1022, must be treated by this CEQA EIR as the controlling authorities in the Update of the General Plan. The Program EIR should therefore evaluate the full range of environmental issues contemplated under CEQA in each Element of the EIR for both positive and negative environmental impacts under each of three alternatives:

- A. The Marinship Specific Plan continues to be enforced,
- B. The Marinship Specific Plan is incorporated in the General Plan Update, and
- C. The Marinship Specific Plan is abandoned.

It must be recognized, however, that alternative "B" above is a matter of pure conjecture since what portions of the MSP will actually be "incorporated" in the General Plan Update are unknown at present. Since the primary motivation for abandoning the MSP is to promote development by removing limitations on uses, floor area ratios, parking requirements, etc., it is unlikely that the "General Intent", much less the 21 "Goals" that follow, will be prominent in the Updated General Plan.

Project Description - Comments

1. The Land Use and Growth Management Element describes the physical, economic, and population growth and development of the City of Sausalito. It establishes the goals, programs, and policies for development and growth regulation within the City's SOI. It includes standards and guidelines for land use development and controls to maintain the historic character and diversity of the community while allowing development.
 - 1.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element by each of the following Marinship Specific Plan alternatives:
 - A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
 - 1.2. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element the area within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence.
 - 1.3. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element one of the most pressing issues of our time. We are vulnerable to the increasing risks brought by climate change. Adapting to climate change includes a range of impacts (sea level rise, rising heat, inland flooding) that are changing in severity over time and affect different parts of the city in different ways. How will we adapt our shorelines and waterfront enterprises and communities, and equitably manage risk before disaster occurs?
 - 1.4. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element a thorough examination of housing in the Marinship and other waterfront areas prone to sea level rise. Consider, and respond to, the following admonition:

In addition to historic and modern-day activities involving toxic and hazardous waste in northern Sausalito and, specifically, the Marinship area, flooding caused by landfill/bayfill subsidence, antiquated sewer systems, sea level rise, and cyclical tidal actions pollute sidewalks, streets, and structures with environmental contaminants such as nitrogen, herbicides, insecticides, oil, grease, toxic chemicals from urban runoff including the nearby 101 freeway, and sediment from improperly managed construction sites and erosion. (City of Sausalito, Housing Element, June 2010, Section 4, page 5, § 4.1.3.)
 - 1.5. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element a thorough examination of the impacts of short term rentals (AirB&B, etc.) in the residential zones.
 - 1.6. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element a thorough examination of the potential

- economic and environmental impacts of any decision on the part of the City to expand its Sphere of Influence by annexing Marin City.
- 1.7. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1022.
 - 1.8. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Land Use and Growth Management Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1128.
2. **The Circulation and Parking Element** addresses all transit styles and includes the goals, policies, and programs that guide the development and maintenance for a safe and efficient transportation system. This element emphasizes public transit, pedestrian and bicycle facilities, and parking and transportation management programs.
- 2.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Circulation and Parking Element by each of the following Marinship Specific Plan alternatives:
 - A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
 - 2.2. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Circulation and Parking Element the areas within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence, the state of waterborne transportation from ferries, harbor cruises and more. How will waterborne transportation contribute to transit resiliency and support waterfront communities underserved by transit; and enhance workforce development in the maritime sector?
 - 2.3. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in Circulation and Parking Element a thorough examination of the impacts of short term rentals (AirB&B, etc.) in the residential zones.
 - 2.4. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Circulation and Parking Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1022.
 - 2.5. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Circulation and Parking Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1128.

3. **The Health and Safety Element** describes the natural and human activity-related hazards that exist in the City of Sausalito and presents guiding policies to protect people and property from natural or man-made hazards, prepare disaster plans, and prevent exposure to unacceptable noise levels. This element addresses geologic, seismic, flood, and fire hazards, as well as hazards created by human activity such as hazardous materials and waste and incidents that call for emergency response. In addition, this element provides measures to control and abate noise and to protect citizens from excessive noise exposure.
 - 3.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Health and Safety Element by each of the following Marinship Specific Plan alternatives:
 - A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
 - 3.2. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Health and Safety Element the areas within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence.
 - 3.3. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Health and Safety Element the areas within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence to monitor, manage, and/or eliminate the presence of "anchor-outs".
 - 3.4. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in Health and Safety Element a thorough examination of the impacts, primarily of access by emergency vehicles, of short term rentals (AirB&B, etc.) in the residential zones.
4. **The Housing Element** identifies and analyzes existing and projected housing needs for safe and affordable housing in all economic segments of the community. It contains the plan and policies for the preservation, conservation, rehabilitation, and production of housing in the City of Sausalito. This element provides a detailed analysis of the City's demographic, economic, and housing characteristics as required by State law. The current Housing Element was adopted in 2015.
 - 4.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives included in the 2015 to 2023 Housing Element by each of the following Marinship Specific Plan alternatives:
 - A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
 - 4.2. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Housing Element a thorough examination of housing in the Marinship and other waterfront areas prone to sea level rise. Consider the following admonition:

In addition to historic and modern-day activities involving toxic and hazardous waste in northern Sausalito and, specifically, the Marinship area, flooding caused by landfill/bayfill subsidence, antiquated sewer systems, sea level rise, and cyclical tidal actions pollute sidewalks, streets, and structures with environmental contaminants such as nitrogen, herbicides, insecticides, oil, grease, toxic chemicals from urban runoff including the nearby 101 freeway, and sediment from improperly managed construction sites and erosion. (City of Sausalito, Housing Element, June 2010, Section 4, page 5, § 4.1.3.)

- 4.3. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Housing Element the assurance that it is consistent with all other Updated Elements of the General Plan.
5. The Environmental Quality Element provides the framework to conserve existing natural resources, preserve open space, and maintain and grow the recreation systems of the City of Sausalito. This element addresses protection of Sausalito's native vegetation, wildlife habitat, and conservation of open space, improvement to water and air quality, as well as conservation of water, energy, and reduction of solid waste. Recreation policies are included in this element to preserve and enhance current and future recreation opportunities.
 - 5.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element by each of the following Marinship Specific Plan alternatives:
 - A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
 - 5.2. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence.
 - 5.3. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence, the natural resources, ecological and shoreline restoration, eel grass protection, oyster beds & farming, water quality improvement, diverse native habitats including herring, green infrastructure, and stewardship.
 - 5.4. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element within the open waters of Richardson Bay identified on NOP Exhibit 2 as the Sphere of Influence to monitor, manage, and/or eliminate the presence of "anchor-outs".
 - 5.5. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element one of the most pressing issues of our time. We are vulnerable to the increasing risks brought by climate change. Adapting to climate change includes a range of impacts (sea level rise, rising heat, inland flooding) that are changing in severity over time and affect different

- parts of the city in different ways. How will we adapt our shorelines and communities, and equitably manage risk before disaster occurs?
- 5.6. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element strive to be consistent with regional ecological goals such as those in the Marin County BayWAVE, Marin Climate Action Plan, Local Climate Action Plans and other Sea Level Rise- Related Adaptation Studies and Plans.
 - 5.7. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1022.
 - 5.8. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Environmental Quality Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1128.
6. **The Economic Element** describes the goals, policies, and programs to regulate commercial development to desired rates and encourage healthy business relationships and activities in the City of Sausalito.
- 6.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Economic Element by each of the following Marinship Specific Plan alternatives:
 - A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
 - 6.2. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element, the working waterfront, industrial innovators and artists in our Marinship area. Most residents of Sausalito are largely unaware of the important role that working vessels, dock workers, shipyards, artists, industrial innovators and makers, among others, play in our lives and economy.
 - 6.3. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element an assessment of the following CEQA requirements for "Economic and Social Effects" caused by, or exacerbated by, the Project'

CCR §15131. ECONOMIC AND SOCIAL EFFECTS

(b) Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant. As an additional example, if the construction of a road and the resulting increase in noise in an area disturbed existing

religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment. The religious practices would need to be analyzed only to the extent to show that the increase in traffic and noise would conflict with the religious practices. Where an EIR uses economic or social effects to determine that a physical change is significant, the EIR shall explain the reason for determining that the effect is significant.

(c) Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project.

- 6.4. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element, a thorough analysis of the widely promoted myth that opening up the Marinship to developers will somehow subsidize the maritime, industrial and artist community and enterprises.
- 6.5. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element a thorough examination of the potential economic impacts of any decision on the part of the City to expand its Sphere of Influence .by annexing Marin City.
- 6.6. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element a thorough examination of methods for monitoring and controlling the costs of a project given risks including those from climate change, initial capital costs, ongoing maintenance requirements, and other factors. Project designs should be assessed for the economic burden it may place on city funds. Analyses of a project's vulnerability to and consequences of changing coastal conditions due to sea level rise and coastal flooding should be considered in determining the cost effectiveness of projects.
- 6.7. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1022.
- 6.8. Include in the analysis and evaluation of the environmental effects, mitigation measures, and alternatives proposed in the Economic Element a thorough examination of the historical benefits and detriments, as well as the potential future impacts of Sausalito Ordinance 1128.
7. **The Community Design and Historical Preservation Element** describes the policies and programs that intend to ensure Sausalito's evolution and diversity of design are harmonious with and reinforce the unique identity and delicate beauty of Sausalito.
 - 7.1. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Community Design and Historical Preservation Element by each of the following Marinship Specific Plan alternatives:

December 9, 2019

- A. The Marinship Specific Plan continues to be enforced,
 - B. The Marinship Specific Plan is incorporated in the General Plan Update, and,
 - C. The Marinship Specific Plan is abandoned.
- 7.2. Analyze and evaluate the environmental effects, mitigation measures, and alternatives proposed in the Community Design and Historical Preservation Element for Tribal Cultural Resources such as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.

Thank you for the opportunity to comment on the NOP for the City of Sausalito's General Plan Update. Though no Draft EIR was provided, I hope that the comments are useful in determining the Scope of the actual DEIR. If you have any questions regarding this letter, please do not hesitate to contact me by phone at 415-309-9335 or email, waw94965@gmail.com.

I leave you with one further item of interest from the CEQA Guidelines:

CCR § 15003. Policies

(e) The EIR process will enable the public to determine the environmental and economic values of their elected and appointed officials thus allowing for appropriate action come election day should a majority of the voters disagree. (People v. County of Kern, 39 Cal. App. 3d 830.)

Sincerely,



William A. Werner

Cc: Adam Politzer, Mary Wagner, Tom Ford

APPENDIX A

The following is included here mainly to remind us that the CEQA Environmental Impact Report springs from some very high minded legislative findings and declarations.

Public Resources Code DIVISION 13. Environmental Quality [21000 - 21189.57]
CHAPTER 1. Policy [21000 - 21006]
21000.

The Legislature finds and declares as follows:

- (a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
- (b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
- (c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
- (d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
- (e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
- (f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
- (g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

21001.

The Legislature further finds and declares that it is the policy of the state to:

- (a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
- (b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- (c) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- (d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- (e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
- (f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
- (g) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

21001.1.

The Legislature further finds and declares that it is the policy of the state that projects to be carried out by public agencies be subject to the same level of review and consideration under this division as that of private projects required to be approved by public agencies.

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