CHAPTER 22.14 – SPECIAL PURPOSE AND COMBINING DISTRICTS

Sections:

22.14.010 – Purpose of Chapter
22.14.020 – Applicability of Special Purpose and Combining Districts
22.14.030 – Special Purpose District Land Uses and Permit Requirements
22.14.040 – Special Purpose District Development Standards
22.14.050 – Minimum Lot Size “-B” Combining District Standards
22.14.060 – Bayfront Conservation (BFC) Combining District Standards
22.14.070 – Primary Floodway (F-1) Combining District Standards
22.14.080 – Secondary Floodway (F-2) Combining District Standards
22.14.090 – Affordable Housing (AH) Combining District Standards

22.14.010 – Purpose of Chapter

This Chapter determines the allowable uses of land, land use permit requirements, and basic development standards for the special purpose zoning districts and combining districts established by Section 22.06.020 (Zoning Districts Established).

22.14.020 – Applicability of Special Purpose and Combining Districts

A. General applicability.

1. Special purpose districts. Special purpose zoning districts are intended to identify sites suitable for types of land uses that are substantially different from, or that may not be appropriate or cannot be readily accommodated along with, most land uses allowed within the other agricultural, residential, and commercial zoning districts established by this Development Code.

2. Combining districts. Combining districts are applied to property together with one of the other agricultural, residential, or commercial zoning districts, to highlight areas where important site, neighborhood, or area characteristics require particular attention in project planning.

   a. The combining districts established by this Chapter provide standards that apply to development and new land uses in addition to those of zoning districts.

   b. The applicability of a combining district to property is shown by its map symbol established by Section 22.06.020 (Zoning Districts Established) being shown as a prefix or a suffix to the symbol for the primary zoning district (e.g., R1:BD, R2:B2, etc.). A site designated within a combining district shall be subject to all applicable provisions of this Chapter, in addition to the requirements of the primary zoning district. If provisions of this Chapter conflict with any requirements of a primary zoning district, this Chapter shall control.

B. OA (Open Area) Zoning/Combining District. The OA zoning district is intended for areas of the County committed to open space uses, as well as environmental preservation. The OA zoning district is consistent with the Open Space, and Agriculture and Conservation land use categories of the Marin Countywide Plan.
C. **PF (Public Facilities) Zoning/Combining District.**

1. The PF zoning/combining district is applied to land suitable for public facilities and public institutional uses, where a governmental, educational, or other institutional facility is the primary use of the site. The PF zoning district is consistent with the Public and Quasi-Public land use categories of the Marin Countywide Plan.

2. The PF district may be applied to property as a primary zoning district where the Board determines that the facility is sufficiently different from surrounding land uses to warrant a separate zoning district, and as a combining district where a publicly-owned site accommodates land uses that are similar in scale, character, and activities, to surrounding land uses.

D. **B, and BFC Combining Districts.** See Sections 22.14.050 (Minimum Lot Size “-B” Combining District) and 22.14.060 (Bayfront Conservation (BFC) Combining District) for the applicability of these districts.

E. **Affordable Housing (AH) Combining District.** The AH zoning combining district allows affordable housing development at a density of 30 dwelling units per acre for affordable housing. See Section 22.14.090 (Affordable Housing Combining District).

...
<table>
<thead>
<tr>
<th>Site Name</th>
<th>Address</th>
<th>Assessor Parcel Number(s)</th>
<th>Zoning</th>
<th>AH Combining District</th>
</tr>
</thead>
<tbody>
<tr>
<td>St. Vincent's / Silveira</td>
<td>St. Vincent's Drive, San Rafael</td>
<td>155-011-08</td>
<td>A2:AH</td>
<td>Limited to 3.5 acres</td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-011-28</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-011-29</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-011-30</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-121-16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marin City Community Development Corporation</td>
<td>441 Drake Ave, Sausalito (Marin City)</td>
<td>052-140-36</td>
<td>RMP-4.2:AH</td>
<td>Limited to 0.5 acres</td>
</tr>
<tr>
<td>Golden Gate Seminary</td>
<td>201 Seminary Drive, Mill Valley (Strawberry)</td>
<td>043-261-25</td>
<td>RMP-2.47:AH</td>
<td>Limited to 2 acres</td>
</tr>
<tr>
<td></td>
<td></td>
<td>043-261-26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
MARIN COUNTY PLANNING COMMISSION

RESOLUTION PC 15-012

A RESOLUTION RECOMMENDING DEVELOPMENT CODE AMENDMENTS FOR THE
AFFORDABLE HOUSING COMBINING DISTRICT AND FOR ASSESSOR’S PARCELS:

155-011-08, 155-011-28, 155-011-29, 155-011-30, 155-121-16,
052-140-36, 043-261-25, and 043-261-26

* * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * * *

SECTION I: FINDINGS

I. WHEREAS, per Government Code Section 65580 et al all sites identified for lower income
housing in a housing element sites inventory for a jurisdiction in a metropolitan county are
required to allow a minimum “default” density of 30 units per acre.

II. WHEREAS, consistent with Government Code Section 65580 et al the County of Marin
was defined as a metropolitan county prior to September 30, 2014.

III. WHEREAS, the Affordable Housing (AH) Combining District was established on
September 24, 2013 by the Board of Supervisors to allow affordable housing at a
maximum density of 30 units per acre on limited portions of three sites identified in the
2007-2014 Housing Element as St. Vincent/Silveira, Marin City CDC, and Golden Gate
Seminary (Assessor’s Parcels 155-011-08, 155-011-28, 155-011-29, 155-011-30, 155-
121-16, 052-140-36, 043-261-25, and 043-261-26).

IV. WHEREAS, Assembly Bill 1537 was signed into law on September 30, 2014, amending
Government Code Section 65580 et al, effectively changing Marin County’s definition as a
metropolitan county to a suburban county and thereby lowering the County’s default
density for lower income Housing Element sites from 30 units per acre to 20 units per acre
for the 2015 to 2023 Housing Element planning period.

V. WHEREAS, the amendment to Government Code Section 65580 et al pursuant to
Assembly Bill 1537 shall remain in effect only until December 31, 2023, and as of that date
is repealed, unless a later statute is enacted before December 31, 2023 that deletes or
extends that date.

VI. WHEREAS, on December 9, 2014, the Board of Supervisors adopted the 2015-2023
Housing Element and directed staff to initiate rezoning procedures for the three sites within
the Affordable Housing (AH) Combining District that are identified as St. Vincent/Silveira,
Marin City CDC, and Golden Gate Seminary (Assessor’s Parcels 155-011-08, 155-011-28,
155-011-29, 155-011-30, 155-121-16, 052-140-36, 043-261-25, and 043-261-26) to 20
units per acre.

VII. WHEREAS, the St. Vinetns/Silveira, Marin City CDC, and Golden Gate Seminary sites
are listed in Figure III-9 of the 2015-2023 Housing Element. The St. Vincent/Silveira and
Marin City CDC sites are also included in the 2015-2023 Housing Element Sites Inventory
(Figure IV-6).

Affordable Housing Combining District Amendment
Resolution PC 15-012
PC Hearing June 22, 2015
VIII. WHEREAS, consistent with California Government Code Section 65008, land use regulations for affordable housing cannot be more restrictive than regulations for market rate housing in the same zoning district.

IX. WHEREAS, the development capacity allowed by the Affordable Housing (AH) Combining District, as applied to limited acreage for each site, does not exceed the total number of units currently allowed by the applicable Countywide Plan land use designation, a community plan, zoning ordinance or development entitlements (such as a Master Plan) for each site.

X. WHEREAS, Sections 22.14.020.E and 22.14.090 of the Marin County Development Code shall be amended as depicted in Exhibit A to clarify that the Affordable Housing (AH) Combining District is an optional tool for property owners that allows affordable housing to be developed at a density of 30 units per acre.

XI. WHEREAS, the Marin County Planning Commission held a duly noticed public hearing on May 28, 2015 and continued the hearing to June 22, 2015 to consider amendments to the Affordable Housing (AH) Combining District, and hear testimony in favor of, and in opposition to, the amendment.

XII. WHEREAS, the proposed amendments to the Affordable Housing (AH) Combining District are within the scope of the 2013 Marin County Housing Element Supplement to the 2007 Countywide Plan EIR ("2013 SEIR"). The certified 2013 SEIR adequately considered the proposed changes to the AH District. Pursuant to Public Resources Code Section 2166 and California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15168, no additional environmental review is required.

SECTION II: ZONING MAP AMENDMENTS

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission recommends that Sections 22.14.020 and 22.14.090 of the Marin County Development Code be amended as shown in Exhibit A to clarify that the Affordable Housing (AH) Combining District is an optional tool for property owners that allows affordable housing to be developed at a density of 30 units per acre.

BE IT FURTHER RESOLVED that the applicability of the Affordable Housing (AH) Combining District on the sites identified as St. Vincents/Silveira, Marin City CDC, and Golden Gate Seminary (Assessor’s Parcels 155-011-08, 155-011-28, 155-011-29, 155-011-30, 155-121-16, 052-140-36, 043-261-25, and 043-261-26) shall be maintained as adopted by Ordinance 3606 and as listed in Development Code Section 22.14.090.D.
SECTION III: VOTE

PASSED AND ADOPTED at the regular meeting of the Planning Commission of the County of Marin, State of California, on the 22nd day of June, 2015, by the following vote:

AYES: KATHERINE CRECELIUS; DON DICKENSON, JOHN ELLER, WADE HOLLAND, PETER THERAN

NOES: DAVID PAOLI

ABSENT: NO ONE

KATHERINE CRECELIUS, CHAIR
MARIN COUNTY PLANNING COMMISSION

Attest:

Ana Hilda Mosher
Planning Commission Recording Secretary
EXHIBIT A
Proposed Amendments to Marin County Development Code Chapter 22.14

CHAPTER 22.14 – SPECIAL PURPOSE AND COMBINING DISTRICTS

Sections:

22.14.010 – Purpose of Chapter
22.14.020 – Applicability of Special Purpose and Combining Districts
22.14.030 – Special Purpose District Land Uses and Permit Requirements
22.14.040 – Special Purpose District Development Standards
22.14.050 – Minimum Lot Size “B” Combining District Standards
22.14.060 – Bayfront Conservation (BFC) Combining District Standards
22.14.070 – Primary Floodway (F-1) Combining District Standards
22.14.080 – Secondary Floodway (F-2) Combining District Standards
22.14.090 – Affordable Housing (AH) Combining District Standards

22.14.010 – Purpose of Chapter

This Chapter determines the allowable uses of land, land use permit requirements, and basic development standards for the special purpose zoning districts and combining districts established by Section 22.06.020 (Zoning Districts Established).

22.14.020 – Applicability of Special Purpose and Combining Districts

A. General applicability.

1. Special purpose districts. Special purpose zoning districts are intended to identify sites suitable for types of land uses that are substantially different from, or that may not be appropriate or cannot be readily accommodated along with, most land uses allowed within the other agricultural, residential, and commercial zoning districts established by this Development Code.

2. Combining districts. Combining districts are applied to property together with one of the other agricultural, residential, or commercial zoning districts, to highlight areas where important site, neighborhood, or area characteristics require particular attention in project planning.

   a. The combining districts established by this Chapter provide standards that apply to development and new land uses in addition to those of zoning districts.

   b. The applicability of a combining district to property is shown by its map symbol established by Section 22.06.020 (Zoning Districts Established) being shown as a prefix or a suffix to the symbol for the primary zoning district (e.g., R1:BD, R2:B2, etc.). A site designated within a combining district shall be subject to all applicable provisions of this Chapter, in addition to the requirements of the primary zoning district. If provisions of this Chapter conflict with any requirements of a primary zoning district, this Chapter shall control.

B. OA (Open Area) Zoning/Combining District. The OA zoning district is intended for areas of the County committed to open space uses, as well as environmental preservation. The OA zoning district is consistent with the Open Space, and Agriculture and Conservation land use categories of the Marin Countywide Plan.
C. PF (Public Facilities) Zoning/Combining District.

1. The PF zoning/combining district is applied to land suitable for public facilities and public institutional uses, where a governmental, educational, or other institutional facility is the primary use of the site. The PF zoning district is consistent with the Public and Quasi-Public land use categories of the Marin Countywide Plan.

2. The PF district may be applied to property as a primary zoning district where the Board determines that the facility is sufficiently different from surrounding land uses to warrant a separate zoning district, and as a combining district where a publicly-owned site accommodates land uses that are similar in scale, character, and activities, to surrounding land uses.

D. B, and BFC Combining Districts. See Sections 22.14.050 (Minimum Lot Size "-B" Combining District) and 22.14.060 (Bayfront Conservation (BFC) Combining District) for the applicability of these districts.

E. Affordable Housing (AH) Combining District. The AH zoning-combining district allows affordable housing development at a density of 30 dwelling units per acre-for-affordable housing. See Section 22.14.090 (Affordable Housing Combining District).

... 

(Sections 22.14.030 through 22.14.080 have been excerpted from this reference document)

22.14.090 – Affordable Housing (AH) Combining District

A. Purpose. This AH combining district will allow affordable housing development at a density of up to 30 units per acre and offers development incentives on sites that are otherwise governed by a lower density zone. This approach will allow compact development to occur on portions of parcels and encourages affordable housing over market rate housing on key sites.

B. Application of combining district. The AH zone shall apply to those eligible sites named in the Housing Element of the Countywide Plan.

CB. Permitted Uses. Affordable housing pursuant to Chapter 22.22 is permitted in an AH zoning-combining district and if consistent with a community or specific plan.

DC. Incentives. Incentives shall be offered pursuant to those established in Chapter 22.24.

D. Application of combining district. The AH zone-combining district applies to the sites listed below:
<table>
<thead>
<tr>
<th>Site Name</th>
<th>Address</th>
<th>Assessor Parcel Number(s)</th>
<th>Zoning</th>
<th>AH Combining District</th>
</tr>
</thead>
<tbody>
<tr>
<td>St. Vincent's / Silveira</td>
<td>St. Vincent's Drive, San Rafael</td>
<td>155-011-08</td>
<td>A2:AH</td>
<td>Limited to 3.5 acres</td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-011-28</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-011-29</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-011-30</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>155-121-16</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marin City Community</td>
<td>441 Drake Ave, Sausalito (Marin City)</td>
<td>052-140-36</td>
<td>RMP-</td>
<td>Limited to 0.5 acres</td>
</tr>
<tr>
<td>Development Corporation</td>
<td></td>
<td></td>
<td>4.2:AH</td>
<td></td>
</tr>
<tr>
<td>Golden Gate Seminary</td>
<td>201 Seminary Drive, Mill Valley (Strawberry)</td>
<td>043-261-25</td>
<td>RMP-</td>
<td>Limited to 2 acres</td>
</tr>
<tr>
<td></td>
<td></td>
<td>043-261-26</td>
<td>2.47:AH</td>
<td></td>
</tr>
</tbody>
</table>
RESOLUTION NO. 2014-109
RESOLUTION OF THE MARIN COUNTY BOARD OF SUPERVISORS ADOPTING THE
HOUSING ELEMENT FOR MARIN COUNTY AND AMENDING
THE 2007 MARIN COUNTYWIDE PLAN

WHEREAS, the Marin County Board of Supervisors hereby finds and declares the following:

WHEREAS, the Marin County Board of Supervisors adopted the Marin Countywide Plan on November 6, 2007. The overarching theme presented in the Plan is planning sustainable communities.

WHEREAS, the Marin Countywide Plan is a comprehensive, long term general plan for the physical development of Marin County and establishes an overall framework and set of goals for countywide development in the unincorporated areas of the County. The 2007 Marin Countywide Plan includes policies to protect and to preserve and enhance the natural environment of the County, and to strive for a high quality built environment.

WHEREAS, the Marin County Housing Element is a required element of the Countywide Plan per Government Code § 65302(c), and its contents must conform to Housing Element Law, Government Code §§ 65580- 65589.8.

WHEREAS, the current Housing Element was adopted by the Marin County Board of Supervisors on September 24, 2013 and incorporated into the 2007 Countywide Plan.

WHEREAS, because housing elements must be updated periodically, the Marin County Community Development Agency initiated an update to the 2007-2014 Housing Element. The Housing Element addresses the Regional Housing Needs Allocation (RHNA) cycle of 2014 through 2022 and the planning period of 2015 through 2023.

WHEREAS, the objective of the Housing Element is to achieve an adequate supply of decent, safe, and affordable housing for Marin's workforce, residents, and special needs populations, in the unincorporated areas of the County.

WHEREAS, after public outreach conducted by the Marin County Community Development Agency, the Marin County Planning Commission held duly noticed public hearings on the Draft Housing Element on July 28, August 25, and November 17, 2014, and recommended that the Marin County Board of Supervisors adopt the Housing Element for the unincorporated portion of Marin County for the planning cycle of 2015 through 2023 and incorporate it into the 2007 Marin Countywide Plan.

WHEREAS, the Marin County Community Development Agency submitted the Draft Housing Element to the California Department of Housing and Community Development (HCD) in September 2014 for preliminary review, and in their October 15, 2014 letter, HCD found the Draft to be in compliance with Housing Element Law.

WHEREAS, the Marin County Board of Supervisors held a duly noticed public hearing on the Draft Housing Element on December 9, 2014 to consider adoption of the Housing Element for Marin County for the planning period of 2015 through 2023 and incorporate it into the 2007 Marin Countywide Plan.
WHEREAS, the Marin County Board of Supervisors certified a Final Environmental Impact Report (State Clearinghouse No. 2004022076) (EIR) for the Marin Countywide Plan prior to the adoption of the 2007 Marin Countywide Plan, and a Supplement to that Environmental Impact Report (State Clearinghouse No. 2012072028) (SEIR) was prepared for the 2007-2014 Marin County Housing Element and certified by the Board of Supervisors on September 24, 2013, and an Addendum to the SEIR was prepared for the Draft Housing Element and was recommended by the Marin County Planning Commission and adopted by the Marin County Board of Supervisors.

WHEREAS, the Housing Element is a planning document and adoption of the Housing Element into the 2007 Marin Countywide Plan will not directly result in changes to the physical environment.

WHEREAS portions of the properties located at St. Vincent's Drive, Seminary Drive and 441 Drake Avenue were rezoned in 2013 to apply the Affordable Housing Combining District at a maximum density of 30 units per acre for consistency with the County’s previous default density under Housing Element legislation, and that in 2014 Governor Brown signed Assembly Bill 1537 which effectively lowered Marin’s default density to 20 units an acre for the Housing Element planning period of 2015 through 2023.

NOW, THEREFORE, BE IT RESOLVED the Board of Supervisors finds there is a need to provide housing for Marin County’s residents, including seniors, families and special needs populations and local workforce and hereby adopts the recommended Housing Element for the planning period of 2015 through 2023 in conformance with Government Code Section 65583 et al. and hereby incorporates the Housing Element into the 2007 Marin Countywide Plan.

BE IT FURTHER RESOLVED that the Board of Supervisors directs staff to initiate rezoning procedures for the portions of the properties located at St. Vincent’s Drive, Seminary Drive and 441 Drake Avenuesites that are within the Affordable Housing Combining District to a maximum of 20 units per acre to be considered by the Planning Commission in 2015, consistent with Assembly Bill 1537.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Marin held on this 9th day of December, 2014, by the following vote:

AYES: SUPERVISORS Judy Arnold, Susan L. Adams, Steve Kinsey, Katie Rice, Kathrin Sears

NOES: NONE

ABSENT: NONE

PRESEENT, BOARD OF SUPERVISORS

ATTEST: 
CLERK

Resolution No. 2014-109
Page 2 of 2
Affordable Housing Combining District

During the previous housing element cycle, the County established an affordable housing combining zoning district. This district allows affordable housing development at 30 units per acre\(^1\) and offers development concessions on sites in the City Centered Corridor that are otherwise governed by a lower density zone. This approach will allow compact development to occur on portions of very large parcels that may have environmental conservation features. It also provides a financial edge to affordable housing over market rate developers. The program specifies that eligible sites should be identified in the Housing Element. Sites are identified in Figure III-9. The first two properties listed are also identified in the Sites Inventory (Figure IV-6).

Figure III-9: Affordable Housing Combining District Sites

<table>
<thead>
<tr>
<th>Site Name</th>
<th>Acres by Parcel</th>
<th>Acres Total</th>
<th>Countywide Plan 2007</th>
<th>Zoning 2014</th>
<th>AH-Combining District(^*)</th>
</tr>
</thead>
<tbody>
<tr>
<td>St. Vincent's / Silveira</td>
<td>244.768</td>
<td>55 developable</td>
<td>PD-Agriculture and Environ Resource</td>
<td>A2:AH</td>
<td>AH zone - limited to 3.5 acres at 30 duac</td>
</tr>
<tr>
<td></td>
<td>221.71</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>72.66</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>20.22</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.82</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>221.71</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>72.66</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>20.22</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.82</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marin City Community</td>
<td>4.06</td>
<td>4.06</td>
<td>MF-2</td>
<td>RMP-4.2:AH</td>
<td>AH zone - limited to 0.5 acres at 30 duac</td>
</tr>
<tr>
<td>Development</td>
<td>4.06</td>
<td>4.06</td>
<td>MF-2</td>
<td>RMP-4.2:AH</td>
<td>AH zone - limited to 0.5 acres at 30 duac</td>
</tr>
<tr>
<td>Golden Gate Seminary</td>
<td>50.00</td>
<td>73.61</td>
<td>MF-2</td>
<td>RMP-2.47:AH</td>
<td>AH zone - limited to 2 acres at 30 duac</td>
</tr>
<tr>
<td></td>
<td>23.61</td>
<td>73.61</td>
<td>MF-2</td>
<td>RMP-2.47:AH</td>
<td>AH zone - limited to 2 acres at 30 duac</td>
</tr>
</tbody>
</table>

Source: Marin County Community Development Agency, 2014

\(^*\) As allowed by Assembly Bill 1537, sites within the Affordable Housing Combining District will be proposed for rezoning from 30 dwelling units per acre to 20 dwelling units per acre in 2015.

\(^1\) As allowed by Assembly Bill 1537, sites within the Affordable Housing Combining District will be proposed for rezoning from 30 dwelling units per acre to 20 dwelling units per acre in 2015.
March 20, 2015

Matthew H. Hymel, County Administrator  
County of Marin  
County Administrator’s Office  
3501 Civic Center Drive, Suite 325  
San Rafael, CA 94903  

Dear Mr. Hymel:  

RE: Marin County’s 5th Cycle (2015-2023) Adopted Housing Element  

Thank you for submitting the housing element Marin County adopted December 9, 2014 that was received for review on December 22, 2015. Pursuant to Government Code (GC) Section 65585(h), the Department is reporting the results of its review. The Department considered comments from Mr. Dave Coury, pursuant to GC Section 65585(c).  

The Department finds the adopted housing element in compliance with State housing element law (Article 10.6 of the Government Code). The adopted element reflects several substantial changes from the draft element reviewed on October 15, 2014 that warrants comments.  

First, several programs now state the County will “consider” certain actions. The Department encourages the County to commit to completing all program actions, particularly actions the County states it will consider regarding the following programs: 1.d: ministerial review, 1.e: second units, 1.f: parking requirements, 1.i: permit process streamlining and 1.l: height limits. The Department appreciates the County’s recognition of the importance regarding the public participation process and evaluation of potential actions, particularly zoning amendments. Specifying commitments associated with programs, schedules of actions, and timelines required by GC Section 65583(c) help achieve implementation and required beneficial impacts toward meeting the County’s housing needs.  

Second, the adopted element reflects significant alterations made to the identified sites in the draft element that were previously relied upon to accommodate the regional housing need for lower income households. Several sites have been removed and/or directed to be downzoned. While the element continues to identify sufficient sites, demonstration of adequate sites is tenuous and exacerbated due to dependency on limited sites (e.g., Marinwood, Saint Vincent) as each site has unique circumstances such as lengthy entitlement processes.
The changes described above to particular programs and sites were determined to minimally comply with State housing law. The County should closely monitor its site inventory and program implementation actions in meeting these requirements:

- **No Net Loss Law (GC Section 65863):** Throughout the planning period, the local government must maintain adequate sites at appropriate densities to accommodate its regional housing need, including for lower-income households. In addition, no local government action shall reduce, or require or permit the reduction of, the residential density of a parcel to, or allow development of any parcel at, a “lower residential density” for any parcel identified in the site inventory unless the local government makes written findings. Written findings must support that the reduction is consistent with the adopted General Plan and the remaining sites identified in the element are adequate to accommodate the jurisdiction’s share of the regional housing need. As defined by statute, “lower residential density” refers to allowing fewer units on the site than were projected within the sites inventory of the housing element.

- **Annual Reports:** To comply with the Annual Progress Report (APR) required by GC Section 65400, the local government must monitor and report on the status of Housing Element programs. If programs are not effective regarding goals, objectives, and beneficial impacts, such as encouraging development affordable to lower-income households, alternative strategies should be pursued which might warrant amending the element.

Please note, the County of Marin now meets specific requirements for several State and Regional funding programs designed to reward local governments for compliance with State housing element law. For example, the Housing Related Parks Program includes housing element compliance as a threshold requirement. Please see the Department’s website for specific information about these and other State funding programs at http://www.hcd.ca.gov/hpd/hrc/plan/he/loan_grant_hecompl011708.pdf.

The Department wishes Marin County success in implementing its housing element and looks forward to following its progress through the General Plan annual progress reports pursuant to Government Code Section 65400. If the Department can provide assistance in implementing the housing element, please contact Mr. Paul McDougall, Housing Policy Manager, at (916) 263-7420.

Sincerely,

[Signature]

Glen A. Campora
Assistant Deputy Director
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Default Densities</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Incorporated Cities within nonmetropolitan/rural counties (as outlined in either Section I or II) and Nonmetropolitan counties with micropolitan areas (listed below)</td>
<td>at least 15 du/ac</td>
</tr>
<tr>
<td>II</td>
<td>Unincorporated areas in all nonmetropolitan counties not included under I</td>
<td>at least 10 du/ac</td>
</tr>
<tr>
<td>III</td>
<td>Suburban jurisdictions</td>
<td>at least 20 du/ac</td>
</tr>
<tr>
<td>IV</td>
<td>Metropolitan jurisdictions</td>
<td>at least 30 du/ac</td>
</tr>
</tbody>
</table>

**Table Notes:**
- Changes are indicated by underline.
- These densities are optional and provided for informational purposes only.

**Jurisdiction Definitions:**

- **Nonmetropolitan counties with micropolitan areas include:**
  - Del Norte
  - Humboldt
  - Inyo
  - Lassen
  - Lake
  - Mendocino
  - Nevada
  - Tehama
  - Tuolumne

- **Nonmetropolitan/rural counties as listed below (list excludes those counties including micropolitan areas as outlined in section I):**
  - Alpine
  - Amador
  - Calaveras
  - Colusa
  - Glenn
  - Mariposa
  - Modoc
  - Mono
  - Plumas
  - Sierra
  - Siskiyou
  - Trinity

- **Jurisdictions (cities/counties) located within a Metropolitan Statistical Area (MSA) with a population of less than 2 million as listed below:**
  - Butte
  - Imperial
  - Fresno
  - Kern
  - Kings
  - Madera
  - Merced
  - Monterey
  - Napa
  - San Benito
  - San Joaquin
  - San Luis Obispo
  - Santa Barbara
  - Santa Clara
  - Santa Cruz
  - Shasta
  - Solano
  - Sonoma
  - Stanislaus
  - Sutter
  - Tulare
  - Ventura
  - Yuba

- **Jurisdictions (cities/counties) located within a Metropolitan Statistical Area (MSA) with a population of less than 2 million as listed below:**
  - Alameda
  - Contra Costa
  - El Dorado
  - Los Angeles
  - Marin
  - Orange
  - Placer
  - Riverside
  - Sacramento
  - San Bernardino
  - San Diego
  - San Francisco
  - San Mateo
  - Yolo

**Source:** OMB Bulletin No. 10-02 [http://www.whitehouse.gov/sites/default/files/omb/assets/bulletins/b10-02.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/bulletins/b10-02.pdf)
This attachment includes all public comments received as of noon on July 15, 2015 for the July 21, 2015 Board of Supervisors hearing on the Affordable Housing (AH) Combining District.
From: Jean Brown  
Sent: Tuesday, June 30, 2015 3:30 PM  
To: Stevenson, Alisa  
Subject: Affordable Housing  

We have neither the water or the infra structure to support more housing of ANY TYPE. It is absurd to have water rationed and still even think of adding more people. Additionally, have you driven on Sir Francis Drake, Pt. San Pedro road, or the freeway after about 1 p.m.? Marin really cannot support any more people.

Jean Brown
Alisa Stevenson, Planner
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Development Code Amendment for the Affordable Housing (AH) Combining District

Dear Board of Supervisors:

It is my wish that you keep the 30 units per acre default density of lower income density for the three existing AH sites as the County Planning Commission has voted. We need affordable housing very much throughout Marin County. Most of our workers live outside the County that not only takes more of their time, but more importantly adds to greenhouse gases that effect climate change. Kindly do keep the 30 units rather than 20 units for allowance to the three sites St. Vincent’s Drive, San Rafael, Marin City Community Development Corporation, and Golden Gate Seminary properties.

I do head MVAHC (Mill Valley Affordable Housing Committee) and we will not meet until July 15, 2015. I believe they would agree with me. Since you will be meeting on July 14, 2015, we will not have a chance to discuss and vote on this. You do have here my wish that you keep the 30 units per acre when you meet on July 14, 2015.

I currently live with 300 persons at The Redwoods in Mill Valley. Although we are all elderly, plenty of persons other than myself do drive cars with approved licenses. There is no congestion and people are very happy here. Sixty of our units are under Section 8.

We very much need affordable housing. I encourage you to keep considering it.

Sincerely,

Elizabeth Moody
From: Ms Angela Gott  
Sent: Monday, July 13, 2015 8:57 AM  
To: Stevenson, Alisa  
Cc: Thomas, Leelee  
Subject: Re: CA State Bill which would fund affordable housing

Hello Alisa,

Thank you for contacting me and by all means, yes, please share this with the Board of Supervisors too- This is from the San Jose Mercury News and Marin County should be kept informed what other counties and municipalities are doing.

I saw this as a repost in Yahoo News and did a copy/paste of it. I wanted to also bring it to the county's attention that the Federal Government HHS Medicaid Program is allowing Medicaid funding to be used to subsidize rent in a supportive housing effort and that CA (other counties) are already implementing this and this is "hot off the press" new administrative regulations being implemented.

I took it upon myself to do copy/paste --again from Yahoo News but these had been in the LA Times and sent what I had found to Kelly at Marin Center for Independent Living (in San Rafael on 4th street) who then shared it with Ritter House. This is to enable vulnerable high risk for homelessness disabled and seniors who are not in subsidized housing (due to the sheer lack of such housing) to maintain living where they are, to top off or bridge the gap between their monthly income and the rising rents they are now facing since there is no rent control.

The Federal Government send a pdf "hand book" for how to implement this-- how counties can implement this to use Medicaid Funding for this purpose-- keep people in their living situations--

There is an organization-- nonprofit--with offices in NYC, in LA, and Oakland which has been running a blog and submitting articles which is how I found out about it-- so I think the Board of Supervisors should be informed that there is a Federally funded "solution" --a stop-gap measure--which could be utilized here in Marin to prevent high risk seniors from being evicted. Marin County's Social Services Department which oversees Medicaid would have to learn about this and implement this --

I will send you copy/paste resends of these emails about this program and a link to the pdf handbook --it's a link but the document is 9 pages--from HHS-- CMS

I will do this in emails to you--following this one-- please duplicate and/or distribute to the Board and and anyone else interested in preventing homelessness of seniors and disabled-- this Medicaid funded solution in order to help seniors like Virginia Tobo, age 91 who gets $1,200 month and just got a rent increase to $1,375 a month and faces eviction.

I will not be able to attend the meeting-- I work on Tuesday afternoons in Larkspur or otherwise I would attend. Please keep me in the loop so I can learn what I missed.

Thank you.

Angela Gott

age 64 high risk for homelessness

From: "Stevenson, Alisa"
To: "angelagott@yahoo.com"
Cc: "Thomas, Leelee"
Sent: Monday, July 13, 2015 7:55 AM
Subject: RE: CA State Bill which would fund affordable housing

Hi Angela,

The Board of Supervisors (not the Planning Commission) will be considering amendments to the Affordable Housing (AH) Combining District at their hearing next Tuesday, July 21 at 1:30pm. I wanted to confirm whether the email you sent below was just intended to be shared with the Planning Commissioners or if you wanted to submit this as a public comment for the Board next week? If intended for the Board then it will be included as part of our administrative record and distributed to the Board with our staff report. Further comments for the Board about this issue should be sent directly to me at this email address.

Thank you,

Alisa

Alisa Stevenson
PLANNER
County of Marin
Community Development Agency
Janice Jensen: Affordable housing needs state support

By Janice Jensen

Special to the Mercury News

POSTED: 07/08/2015 10:00:00 AM PDT

The lack of affordable housing in Silicon Valley has reached a crisis point. Whether it is the homeless on our streets, families struggling to pay skyrocketing rents, or boardroom executives wrestling with how to attract and retain talent in such an expensive real estate market, the struggle for affordable housing impacts every layer of our community.

Yet our struggle to find solutions will founder as long as one critical piece of the puzzle remains missing: a dedicated source of funding for the creation and preservation of affordable housing.

The California Supreme Court's recent decision to uphold San Jose's inclusionary housing ordinance was a big win and certainly a step in the right direction. Unfortunately, it is a drop in the bucket compared to what is needed to address the ever-growing shortage of affordable homes.

The sad fact is funding for affordable housing suffered a fatal blow with the demise of the state's redevelopment agencies three years ago. For 65 years in California, they played a key role in funding affordable home construction.

But a solution is within reach. Speaker of the Assembly Toni Atkins introduced a package of measures including AB 1335, which is making its way through the Assembly. AB 1335 would finally secure a dedicated source of funding for affordable housing through a small recording fee on certain real estate documents. This legislation would generate as much as $500 million in state funding which, in turn, could leverage an additional $2.8 billion in federal funds -- an investment that is both necessary and long-overdue.

While the fund will take time to accumulate and will raise roughly half of the funding once produced by the extinct redevelopment agencies, it has the advantage of stability and continuity, essential elements in any comprehensive solution.

AB 1335 is a low-cost, low-burden way of securing a dedicated stream of funding so crucial to addressing the affordable housing crisis. That's why it is supported by local Assembly members Rich Gordon, Kevin Mullin, Luis Alejo and Evan Low, as well as state Sen. Jerry Hill. It also has the noteworthy backing of the California Association of Realtors.

Versions of this bill have been introduced for the past few years, only to die in the Legislature. This bill could suffer the same fate. But the crisis in affordable housing will only deepen the longer we fail to take action.

The facts are drearily familiar: Santa Clara County has the third-highest homeless population in the nation. Rents have increased 54 percent since 2010. And a full 78 percent of residents cannot afford a median priced home, which now stands at $877,200.

It's time to act. Our elected leaders are accountable for addressing a housing crisis that affects us all. Without a dedicated source of funding, efforts to address the affordable housing emergency will continue to limp along in a piecemeal, ad hoc fashion, an inadequate response to a problem that requires a comprehensive solution. AB 1335 is part of that solution, if only we have the courage to seize it.

Janice Jensen is President and CEO of Habitat for Humanity East Bay/Silicon Valley. She wrote this for this newspaper.
CA is participating Medicaid: A Path to Housing & Services

I just read this in Huffington Post

Medicaid for Services Update

Posted: 06/29/2015 10:50 am EDT Updated: 2 hours ago

Two weeks ago, I wrote about Medicaid - A Path to Housing & Services. In the previous blog, I explain how California is asking the federal government for permission to use Medicaid funds contributed by Uncle Sam to pay for rental assistance for the most medically fragile and vulnerable people facing homelessness. California, New York, Massachusetts and some other states already use federal Medicaid funding/reimbursement to help cover the services so critical to making supportive housing work.

Supportive housing successfully keeps people off the streets by creating access to affordable apartments and services - including healthcare. Not only does it prevent and end homelessness, supportive housing costs less than what we spend now on emergency, crisis care for those experiencing long-term or recurring homelessness.

Analyses in the three states I mention and elsewhere underscore the facts that supportive housing reduces costs and produces better health outcomes for residents because the stability of being housed with access to services translates into stark reductions in emergency department use, hospital admissions, length of hospital stays, and even days in nursing homes.

This past Friday, the US Centers for Medicare and Medicaid (CMS) amplified this message by issuing an official bulletin encouraging and guiding states to use Medicaid resources, where appropriate, to help provide the services complementing the affordable housing side of supportive housing.

In the words of CMS, the informational bulletin: "is intended to assist states in designing Medicaid benefits, and to clarify the circumstances under which Medicaid reimburses for certain housing-related activities, with the goal of promoting community integration for individuals with disabilities, older adults needing long term services and supports, and those experiencing chronic homelessness."

This is timely and welcomed guidance from CMS, and we encourage all states, communities and providers to rely on it to enhance their resources and abilities to provide housing-related services, including housing-retention services, through the opportunities offered by Medicaid.
From: Ms Angela Gott
Sent: Monday, July 13, 2015 9:07 AM
To: Stevenson, Alisa
Subject: Fw: The first article 6/16/2015 about Medicaid Funds going toward Housing rents

This is email #2 about this Medicaid program. I just sent you the first one.

Read below-- in CA State Government the agency or department is State of CA Health Care Services Department and the head of that is Mari Cantwell

CSH is Corporation for Supportive Housing

I just sent you the latest published 06/29/15 which you should have received.

This is just additional information.

Medicaid -- A Path to Housing & Services

Posted: 06/16/2015 6:46 pm EDT Updated: 06/16/2015 7:59 pm EDT

"I am too old and sick to be back out there on the streets. It kind of takes a toll on a person."

These words, spoken to Kaiser Health News by a gentleman once facing homelessness and now in supportive housing, say it all. That's why several states are looking to use dollars traditionally set aside for healthcare programs to cover housing costs too.

As CSH and others have shown, supportive housing is a social determinant of health. Very simply: if you are stably housed in a solution such as supportive housing, you are more likely to be able to care for yourself and access appropriate healthcare.

Because study after study has demonstrated the nexus between housing and health outcomes, California is asking the federal government for permission to use Medicaid funds contributed by Uncle Sam to pay for rental assistance for the most medically fragile and vulnerable people facing homelessness. California isn't the first state to make this request. New York pitched the idea before, but the feds said no and so the State decided to go it alone and use its own share of Medicaid to house chronically ill patients experiencing homelessness. New York was given permission by Washington to use federal Medicaid dollars for services. And other states too, such as Massachusetts, use their own and federal Medicaid monies not for rental assistance but for the services so critical to making supportive housing work.

CSH is active in California, New York and Massachusetts, and our own analyses in these states underscores the fact that supportive housing reduces care costs and produces better health outcomes for residents. The main reasons -- there are stark reductions in emergency department use, hospital admissions, length of hospital stays, and even days in nursing homes when formerly homeless people are housed and access to preventive and regular healthcare services is part of the mix.

Research by our partners in Los Angeles produced similar conclusions. In a report two years ago, the Economic Roundtable found total health care costs for the most medically fragile homeless patients in supportive housing were 72 percent lower per person than for those still mired in homelessness.

California's proposed blueprint is one of the most sweeping to date, providing incentives for Medicaid not only to cover a broad number of vulnerable people on a consistent basis, but also to collaborate with counties, housing authorities, and health and housing providers to coordinate resources.

In a recent statement to Kaiser, Mari Cantwell, deputy director of the State of California Health Care Services Department, said healthcare and housing are too often treated as two distinct areas, never really coordinating, collaborating or sharing information or resources. "We are really trying to look at the whole person," she said. "And our belief is that this (California's proposal to the feds) will improve health care and reduce costs."

Cantwell is right and the federal government should recognize her wisdom and the mounting evidence, and say yes to California's plan as soon as possible.

When a person is taken out of homelessness and finds the stability that comes with housing, they can focus on other needs such as healthcare. That benefits all of us because we save money and see better outcomes.
Ms Angela Gott

Monday, July 13, 2015 9:13 AM

Stevenson, Alisa

Fw: pdf dated June 26, 2015 federal-policy-guidance download for supportive housing using Medicaid Funds

This is the 3rd email of 4 about this Medicaid program to cover the rents

Here is the link for the "handbook" on how Marin County can get the Federal Funds and implement this Medicaid Program to use the Medicaid funds for supportive housing. Please print this off and distribute to the Board members and everyone else you can think of to start this ball rolling -- to help Marin 's seniors age in place.

It's in pdf format so I could not do a copy/paste but click on the link below--this was just issued by the Federal Government CMCS Informational Bulletin Coverage of Housing-Related Activities and Services for Individuals with Disabilities (so this should help all your clients at MCIL)

pdf dated June 26, 2015 federal-policy-guidance download for supportive housing using Medicaid Funds


This is 9 pages long and at the end of it-- it did let me do a copy/paste of this much

CMS is committed to assisting states in providing housing-related services and activities and to expand home and community-based living opportunities. Please contact Martha Egan at martha.egan@cms.hhs.gov for questions about this Bulletin.
From: Ms Angela Gott  
Sent: Monday, July 13, 2015 9:19 AM  
To: Stevenson, Alisa  
Subject: Fw: Corporation For Supportive Housing is in Oakland!

This is email #4 about using Medicaid Funds, this Federal program to bridge the gap between the resources of the seniors and their actual living expenses so that they can age in place.

Let me know if you did not receive all 4 emails. You should have gotten 5 from me this morning in a row-- the response back from what you sent me, plus these 4 about the Medicaid Program being used for supportive housing--I evidently got this from the Huffington Post. Earlier I said Yahoo News.

The nonprofit organization which has the most experience and is doing this in Alameda County already using Medicaid Funds is below--

Angela Gott
July 13, 2015

Marin County Board of Supervisors
3501 Civic Center Drive, #329
San Rafael, CA 94903

Re: Proposed Amendment for the Affordable Housing (AH) Combining District affecting three sites located at 1) St. Vincent’s Drive (North San Rafael), Seminary Dr. (Mill Valley) and 441 Drake Ave. (Marin City) to be discussed on July 21, 2015.

Dear Marin County Board of Supervisors,

We have the following comments and recommendations regarding the proposed Amendment for the Affordable Housing (AH) Combining District.

I. Lower density at Housing Element sites to reflect the reduced default density
We commend the County on proposing changes to the Affordable Housing Combining District (AH Zone) to reflect the reduced default density of 20 units per acre allowed by Assembly Bill 1537 for lower income housing sites identified in the Housing Element. A lower residential density would not only help to preserve the traditional character of Marin County but would also lower potential adverse environmental impacts resulting from high-density development. Furthermore, by lowering the density at Housing Element sites, Marin County would be able to show the California State Department of Housing and Community Development (HCD) that the County can provide affordable housing at lower densities. Such a history would help Marin County officials renew Assembly Bill 1537 when it expires. However, we are opposed to increasing the area of the AH Zones.

II. Prohibit increasing the area of the AH Zones
We are opposed to increasing the area of the AH Zones in order to maintain the same number of housing units listed in the 2015-2023 Housing Element Sites Inventory.

We recognize the statute – No Net Loss Law (GC Section 65863), which among other things, states that no local government action shall reduce, or require or permit the reduction of, the residential density of a parcel to, or allow development of any parcel at, a “lower residential density” for any parcel identified in the site inventory unless the local government makes written findings.
We are confident that Staff would be able to provide such written findings, which would demonstrate that the residential density reduction is consistent with the adopted General Plan and the remaining sites identified in the element are adequate to accommodate the County’s share of the regional housing need that support the reduction.

The Marin County 2015 to 2023 Housing Element Site Inventory plans for over 200% more housing units than required by law. The State required the County to plan for 185 housing units but the County’s Housing Element plans for 378 units. These are 193 more units than necessary! With such a large buffer, the County can easily reduce the number of units identified at Housing Element sites that are also included in the AH Zone.

The St. Vincents / Silveira site is a highly constrained and environmentally sensitive area and never should have been included in the Housing Element. As stated in the Community Marin 2013 Report; “The desired outcome for St. Vincent’s / Silveira continues to be acquisition for resource protection, restoration of Miller Creek, protection of wildlife habitat, agricultural preservation, and protection of public health and safety, rather than development.”

Moreover, the County never resolved the fact that if a State Density Bonus of 35% would be applied to the St. Vincent’s site, then the number of allowable dwelling units could rise up to 298 units, far exceeding the CWP CAP of 221 units.

Therefore, the number of acres included in the AH Zones, particularly the AH Zone at the St. Vincents / Silveira site, should not be increased if the zoning is lowered to 20 units per acre. Rather, the potential development at these sites should be lowered.

III. Remove the Golden Gate Seminary property from the Affordable Housing (AH) Combining District

The Golden Gate Seminary property in Strawberry is no longer in the Housing Element and therefore should be removed from the AH Zone.

Page V-3 of the 2007 to 2014 Marin County Housing Element (adopted September 24, 2013) states the following:

“1.c. Establish an Affordable Housing Combining District.

A. Amend the Development Code to establish an affordable housing combining zoning district that increases residential density on certain sites specified in the housing element to 30 dwelling units per acre, in
order to meet future RHNA need. Incentives are available consistent with Chapter 22.24.

B. Amend the Countywide Plan land use section to add a cross-reference to the combining district.”

The Marin County Development Code describes the Affordable Housing Combining District as follows:

"22.14.090 - Affordable Housing (AH) Combining District.

A. Purpose. This district will allow affordable housing development up to 30 units per acre and offer development incentives on sites that are otherwise governed by a lower density zone. This approach will allow compact development to occur on portions of parcels and encourage affordable housing over market rate housing on key sites.

B. Application of combining district. The AH zone shall apply to those eligible sites named in the Housing Element of the Countywide Plan.

C. Permitted Uses. Affordable housing pursuant to Chapter 22.22 is permitted in an AH zoning district and if consistent with a community or specific plan.

D. Incentives. Incentives shall be offered pursuant to those established in Chapter 22.24 (Ord. No. 3602, § II (exh. A), 2013)"

Based on the above descriptions of the Affordable Housing Combining District, it is clear that the designation was intended to only apply to sites listed in a Housing Element. Since the Golden Gate Seminary property is not listed in a Housing Element, the AH Zone should not apply to the site.

IV. Amend Additional County Development Codes

While the County is considering amending the Affordable Housing Combining District of the Marin County Development Code and lowering potential multifamily residential density to 20 units per acre in order to maintain the traditional character of the County and lower potential adverse environmental impacts resulting from high-density development, we recommend other similar amendments to the Marin County Development Code.

A. Amend County Development Code 22.24.020 (A) and 22.24.020 (B)

On January 24, 2012, the County amended its zoning code to:

1) Allow for affordable housing “in any zoning district provided that the review authority first find that residential uses are allowed by the applicable Countywide Plan land use designation,” See County Code 22.23.020 (B); and
2) Establish that for “affordable housing located in all districts that allow residential uses, allowable density will be established by the maximum Marin Countywide Plan density range.” See County Code 22.24.020 (A).

Ideally, the Marin County Development Code 22.24.020 (A) and 22.24.020 (B) should be eliminated from the Development Code. These zoning codes were adopted without any CEQA review, despite the HUGE increase in potential buildout that they allow. At minimum, the County Code 22.24.020 (A) should be changed to the following:

**County Code 22.24.020 (A):** Establish that for “**affordable housing located in all districts that allow residential uses, allowable density will be established by the maximum Marin Countywide Plan density range or 20 dwelling units per acre, which ever residential density is lower.**”

**B. Amend all residential zoning in the Marin County Development Code, which allows more than 20 dwelling units per acre.**

Amend the Marin County Development Code so that any residential zoning, which allows more than 20 dwelling units per acre, shall be lowered to 20 dwelling units per acre or lower.

**V. Conclusion**

In order to maintain the traditional semi-rural character of Marin County and lower potential adverse environmental impacts resulting from high-density development, we urge you to enact our above recommendations.

Thank you in advance for your conscientious consideration.

Very truly yours,

/s/
Sharon Rushton
Chairperson
Sustainable TamAlmonte
Dear Supervisors: As a 33 year resident of Marin County I am writing to endorse the Sustainable TamAlmonte letter to you regarding recent developments in the affordable housing issue. Please consider very seriously the points spelled out in that letter of 7/13/15. Thank you. Respectfully submitted by Dorothy McQuown, Tam Valley resident.