



Sierra Club Marin Group
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August 1, 2006

Mr. Tim Haddad, Environmental Coordinator
Marin County Community Development Agency
3501 Civic Center Drive, #308
San Rafael, CA 94903
Via fax: 499-7880

Re: Binford Road Storage Facility, Negative Declaration
General Plan Amendment, Rezoning, Master Plan, Tentative Map, Tidelands Permit

Dear Mr. Haddad:

The Sierra Club Marin Group submits the following comments on the July 7, 2006, Negative Declaration for the Binford Road Storage Facility.

Land Use and Planning

The project falls entirely within the boundaries of the proposed Baylands Corridor designated in the Draft Marin Countywide Plan, the purpose of which is to provide "heightened recognition of the unique environmental characteristics of this area and the need to protect its important resources." (p. 1-2) This is one of the most important policy changes proposed in the draft plan. Even though the new plan is not yet adopted, the size and potential impacts of the proposed storage facility are such that it should be evaluated in accordance with the recommended new policies, rather than only with the policies of the 12-year-old existing plan. This is particularly true in the light of the fact that the proposed development includes a General Plan Amendment.

The storage facility includes 247,000 square feet of development for 250 self-storage buildings, 18 to 24 feet high, adding impermeable surfaces next to the Novato Canal, which drains to Black John Slough and the Petaluma River. There would be 85,000 cubic yards of new fill added atop the existing levees. The impacts of these changes should be evaluated in accordance with the proposed Baylands Corridor policies of the draft Countywide Plan, particularly policies for setbacks from wetlands, limited development and access, protection of freshwater habitats, diked bay marshlands restoration, and planning to account for sea level rise. (pp. 2-41 - 2-44)

This would be the first major project in the new Baylands Corridor. The proposed fill would require five to ten years, and the project would therefore be built long after the new Countywide Plan is adopted. It is important that the project be consistent with the new plan.

WATER

The Initial Study contains extensive mitigation measures for handling storm water runoff. However, the basic question of the addition of more than a quarter million square feet of impervious surface next to a waterway should be addressed, in the light of the need to protect environmental resources in this corridor. Another issue is that the storage units will be for boats and other vehicles, which are likely to leak oil, gasoline, and other pollutants.

BIOLOGICAL RESOURCES

The development would fill seasonal wetlands on the western part of the property. Even though these wetlands are described as "degraded," the use of the site by special status species has been reported. Allowing the fill of any wetlands is questionable in a corridor where protection of environmental resources is of paramount importance.

Thank you for the opportunity to comment.

Sincerely,

Marjorie Macris
Sierra Club Marin Group