



Sierra Club Marin Group
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August 28, 2006

Ms. Johanna Patri, AICP, Senior Planner
Marin County Community Development Agency
3501 Civic Center Drive, #308
San Rafael, CA 94903
Via fax: 499-7880

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

Dear Ms. Patri:

The Sierra Club Marin Group recommends that the Planning Commission deny the application for the Binford Road Storage Facility, scheduled for consideration on August 28. This project has such great conflicts with environmental and land use policies that it should be denied without adding the expense of preparing an Environmental Impact Report, as allowed by the California Environmental Quality Act. Following is a discussion of the major issues presented by this project.

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 consistent 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 project would conflict 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). The staff report recommendation that the project be limited to the proposed first phase only would reduce the scale of its impacts, but not the conflict between the proposal and the policies of the proposed Baylands Corridor.

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 QUALITY

The Initial Study contains extensive mitigation measures for handling storm water runoff. However, the addition of more than a quarter million square feet of impervious surface (for buildings only, not including driveways) next to a waterway would have potentially adverse impacts on water quality. 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 staff report corrects the statement in the Initial Study that the project would fill existing wetlands, where special status species have been observed. The wetlands on the site have already been filled as part of the cleanup project. Allowing the fill of any wetland is questionable in a corridor where protection of environmental resources is of paramount importance.

GEOLOGY

The project involves the addition of extensive fill on compressible Bay Mud, in an area subject to flooding, liquefaction in the event of an earthquake, and inundation in the event of sea level rise. A project of this magnitude is not appropriate on a site of such severe geologic constraints.

Thank you for the opportunity to comment.

Sincerely,

Marjorie Macris
Sierra Club Marin Group

Binford Road PC