

April 26, 2013

MTC-ABAG  
101 8<sup>th</sup> Street  
Oakland, CA 94607

**Re: Public comment on Draft EIR Plan Bay Area**

I am a 36 year resident of Mill Valley, a real estate agent for 32 years, a former elementary school teacher, married to a retired fire fighter. I currently sit on the zone 3 flood control board for Marin County. I have been active in civic affairs for most of my life. I would like to comment on some of the inadequacies of the Plan Bay Area DEIR.

**1. Public Utilities – Water**

Pg. 47 – Impact 2.12-1. The proposed plan could result in insufficient water supplies from existing entitlements and resources to serve expected development. “Adequate supplies...rely on successful achievement of water conservation targets.” ...”adequate supply through 2040 is not guaranteed without significant water conservation efforts.”

The plan will result in a significant lack of water and much sooner than 2040. Marin County is chronically short of water and our supply is finite and dependent on precipitation. During periods of drought, Marin doesn't have enough water for its current residents. We already practice significant water conservation. There is only so much that can be done without compromising our basic needs. Why does the DEIR not address this basic issue?

Pg. 48 – Sonoma County expects demand to exceed supply during a single dry year before the year 2040.

2

Marin County contracts with Sonoma to buy water from the Russian River in Sonoma County. What will happen if there is not enough water to sell? Why didn't the DEIR address this issue?

Pg. 20 – Table 2.12

Marin's water supply adequacy is based on no change in supply and demand over the years between 2015 and 2035, and, less demand in the year 2035. How can there be less demand in 2035 with the increase in population predicted by ABAG?

Pg. 48

"...land development through 2040 served by Marin Municipal Water District...should have adequate water supplies in both regular and single dry years."

How can this be when Sonoma which is expected to have inadequate water in a single dry year is a supplier to Marin?

Pg. 49

"...the proposed plan, overall, may result in insufficient water supplies..."  
The only mitigation offered by the DEIR is conservation which is clearly not enough.

Pg. 50

Significance after mitigation – "even using all the possible mitigations, there will not be enough potable water."

How can this plan be acceptable when it is clear there will not be enough water to drink?

Pg. 56

The true impact of Plan Bay Area is stated in the last paragraph on this page and should not be ignored.

"Environmental impacts could occur from both the construction process and the conversion of undeveloped land to accommodate expanded facilities. The construction process could lead to a wide range of environmental effects such as negative impacts on air quality, storm water runoff and noise. The conversion of undeveloped land could result in the loss of agricultural land, increased storm water runoff, loss of habitat, and damage to visual

3

and cultural resources among other impacts. Because site specific information is needed to assess impacts, project level environmental review will be required for construction of new water and waste water facilities."

In the above paragraph, every 'could' should be changed to 'would',

as all of these negative impacts will occur. Why does the DEIR not acknowledge the severity of adverse environmental effects of the project? There is no discussion of costs associated with water and waste water development. Who is responsible, the cities, towns, state government? Why no discussion of this issue?

## **2. Public Services and Recreation**

The DEIR is woefully inadequate in assessing the effects of added residents on schools, fire departments and police services. In considering such an important element of this plan, only 16 pages are devoted to these services and most of those pages are definitions of the various agencies, not solutions, not mitigations.

Pg. 13 – “Priority Development Areas are nominated by local jurisdictions as appropriate places to concentrate future growth. PDA’s are existing neighborhoods served by transit...” This statement is not always true. In unincorporated Mill Valley, the PDA is located on a flood plain and is isolated from the existing neighborhood. Why would the DEIR approve housing in such a poor location?

In regard to school financing, police and fire protection, where will the funds come from? The DEIR does not take into account that the type of dense building contemplated will be done mostly by nonprofit developers who are exempt from property taxes. Why is this important issue ignored in the DEIR?

“...ensure that adequate public services and related infrastructure and utilities will be available to meet or satisfy levels identified...” Where are the funds to ensure that this will be possible?

Pg. 13-14 Vehicle Hours of Delay

This plan is expected to increase VHD and cause level of service F.

4

To imply that the impact of this increased traffic congestion is offset by improved access to services is ridiculous. Why wasn’t this major flaw in the transportation element investigated and addressed? The mitigations are inadequate and meaningless.

The DEIR is inadequate on almost every level. The mitigations are, in most cases, either impossible or infeasible meaning that they will not be

implemented; thereby, leaving the citizenry of California to somehow deal with a plan which is in no way to any private citizen's advantage, and which will create more environmental hazards than it could ever hope to resolve.

Sincerely,

Linda Rames