

November 20, 2014

Heidi Scoble, Planner
Marin County Civic Center
3501 Civic Center Drive
San Rafael, CA 94903



Via email: hscoble@marincounty.org

Re: 135 Balboa St., Inverness Park Coastal Permit and Design Review

Dear Ms. Scoble:

Marin Conservation League's Land Use Committee has reviewed the application for a Coastal Permit and Design Review for a proposed single-family residential project at 135 Balboa St. in Inverness Park ("project") and wishes to comment on the application. MCL typically does not comment on single-family residential proposals. This case presents several difficult permitting issues, however, and could set a precedent for construction of other homes that do not conform to County design guidelines regarding size. We have read the letters from the Inverness Association and from the EAC and agree with their findings and comments. We wish to emphasize several of their points. The project warrants closer examination, at a minimum, an Initial Study pursuant to CEQA.

The 8,297 square-foot (sf) project is about four times the median size of homes on Balboa and its extension, Drakes Summit Road. It is almost twice the size of the largest existing residence in this neighborhood. The proposed project clearly does not conform to the County design guideline stating that projects "should not substantially exceed the median home size for the surrounding neighborhood." Furthermore, MCL is a contributing author of the document *Community Marin 2013*, which recommends that single-family residences should not exceed 4,000 square feet in size, for both consistency with surrounding neighborhoods and in order to reduce resource consumption in construction and operation.

According to the plans, there is a 750 sf "second unit", which is within the County size maximum for second units. However, there is also an attached "studio" of 1,316 sf. The only entrance to the "studio" is through the "second unit." Together the "second unit" and the "studio" will likely function as a 2,066 sf second unit in violation of the 750 sf size limitation on second units.

The removal of 38 large trees, most of them outside of the building footprint, appears to violate zoning requirements and design review guidelines, both of which limit tree removal. Several large Douglas firs appear to be slated for removal for view enhancement. These can be seen in the drawings, as well as on the site, as they are marked.

Although the owner-builder claims that the complex is for family use, such a large set of residences could be used as a B&B by this owner or, if sold, it could then be used by future owners for rental purposes. With a total of 17 bedrooms and 14 bathrooms, there is nothing to prevent these buildings from serving as a lodge for many guests at one time. A permanent deed restriction should be required to prohibit such a use. The traffic, noise, and water consumption from conversion to a de facto motel or conference center would be troubling and should be analyzed in the Initial Study as a potential future use.

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We understand that well reports show that the existing pump barely meets the minimum requirements for two smaller residential units, and that the existing well and pump would be insufficient for just the larger unit if at full occupancy. The proposed water tanks would only buffer demand temporarily. The adequacy of the water table should be tested, consisting of continuously pumping the subject well while monitoring all wells within a half mile or so for excessive draw-down, for several days, with a hydrologic engineer performing the tests. As we are experiencing a three-year drought, we are all aware of the potential for inadequate well water in West Marin.

Finally, there is much concern about the capacity for this project to change development and redevelopment expectations in the area west of Tomales Bay. Like much of the Inverness Ridge area, homes in the immediate neighborhood are generally older and are varied in size, but most are small and fit into the forest environment. The proposed project at 135 Balboa would send a signal to realtors, developers, and buyers that this could become a neighborhood for larger homes that dominate rather than fit into the environment.

MCL urges you to address these issues in an Initial Study that also considers alternatives of substantially reduced size. We appreciate your attention to this matter.

Sincerely,



Jon Elam, President



Susan Stompe, Chair, Land Use Committee