



Planning for Success.

December 9, 2022

Martha Battaglia
Senior Planner
Town of Corte Madera
240 Tamal Vista Boulevard, Suite 110
Corte Madera, CA 94925

Re: Errata to the Final Subsequent EIR, Town of Corte Madera 6th Cycle (2023-2031)
Housing Element Update

Dear Martha,

This is an errata to the above- referenced SEIR addressing proposed changes to the project description for the Town of Corte Madera 6th Cycle (2023-2031) Housing Element project, which includes an update to the Town's housing element, safety element, land use element, and zoning code. A draft SEIR was prepared and released for the required 45-day public review period between October 7, 2022 and November 21, 2022. A final SEIR was subsequently prepared on December 8, 2022.

Revised Project Description

Per your memorandum, dated December 1, 2022, EMC Planning Groups staff understands the following project description changes have been made to the 6th Cycle Housing Element Update project:

Removal of Site 1 as a Housing Opportunity Site

- Site 1 – 601 Tamalpais Drive has been removed as a Housing Opportunity Site from the Site Inventory. The evaluation in the SEIR assumed that this site would be developed with 11 units.

Increase Density for Senior Housing Projects

- The draft zoning ordinance amendment includes Special Standards for Senior Housing projects. These provisions allow for an increase of five (5) dwelling units/acre above the base density established for each housing opportunity site.
- Based on prior meetings with a developer that specializes in this type of development, it is Town staff's understanding that the unit sizes in a Senior Housing project would be smaller than that of a market rate development (projects are typically developed with mostly one-bedroom units).
- Staff anticipates that no more than five sites would be developed with a senior only housing project. This type of development would not occur at the Macy's site.
- Applying the increase of five (5) additional dwelling units per acre to the five largest sites (excluding the Macy's site) results in an increase of 60 additional units beyond that analyzed in the SEIR.

Residential Care Facilities

- The draft zoning ordinance amendment includes this type of use as a conditional use in the HE-1 and HE-2 sub-areas.
- The maximum allowable height would be 35 feet for Site 1 (111 Lucky Drive – formerly site 5) and Site 2 (5651 Paradise Drive – formerly 9) the same as what was analyzed in the SEIR. 50 feet for Sites 3-9 (refer to the attached revised opportunity sites map for locations/addresses) is also the same height as what was analyzed in the SEIR for each of these sites.
- The density established in these sub-areas would not apply to this use. Residential care facilities are considered a commercial use thus the densities in these sub-areas do not apply.
- The allowable floor area ratio (FAR) would be established through the discretionary review process – Design Review and Conditional Use Permit.

In addition, the previous housing opportunity sites map has been revised and the opportunity sites renumbered to reflect the removal of the previously identified Site 1. This revised opportunity sites map, with the revised site numbering, is included as an [Attachment A](#).

SEIR Impacts Analysis Review

The following is a brief discussion of each of the previously identified significant impacts from the SEIR and how the revised project description does or does not alter the conclusions of the SEIR.

Visual Resources & Aesthetics

The proposed changes would result in the removal of one housing site and therefore, there would be no impact associated with that site. The proposed changes to the density for the Senior Housing would still be subject to the same site coverage and height limitation in the zoning code and therefore, there would be no change in the visual impact associated with that change. Additionally, under the proposed project description changes for “Residential Care Facilities,” the maximum allowable height would be 35 feet for Sites 1 & 2 (the same as what was analyzed in the SEIR) and 50 feet for Sites 3-9 (the same as what was analyzed in the SEIR). Therefore, the visual analysis prepared for the SEIR would not substantially change and the level of impact and mitigation measures identified would still apply to the proposed project, and no further environmental analysis for the project with the proposed changes would be required.

Transportation

As reflected in the memorandum prepared by Hexagon Transportation Consultants and dated December 5, 2022 (see [Attachment B](#)), removal of Site 1 would not result in a change to the estimated vehicle miles traveled (VMT) per capita for the previous project description, although it would result in fewer vehicle trips generated and fewer VMT overall. Development of senior housing on some sites would result in fewer trips as well as shorter trips despite the increase in the number of dwelling units (60 units). Senior housing units generate fewer and shorter trips than conventional housing, thus this change will actually reduce VMT despite the increased number of housing units. Finally, the Residential Care Facility component is an allowed commercial use in the mixed-use designations for the housing sites and therefore, is adequately evaluated in the SEIR. Therefore, the total VMT and the VMT per capita for the project with the proposed changes would be lower than the VMT per capita for the previous project description.

Air Quality, Greenhouse Gas Emissions, Energy, and Noise

As addressed under “Transportation” above, as vehicle miles traveled (VMT) in total and per capita, and trip generation total, is reduced due to the project description

changes, impacts associated with air quality, greenhouse gas emissions, and energy are concurrently reduced. Therefore, the air quality, GHG, and energy impacts analysis prepared for the SEIR would still be adequate and the level of impact and mitigation measures identified would still apply to the proposed project. No further environmental analysis for the project with the proposed changes would be required.

Biological Resources

Biological impacts associated with the proposed project and identified in the SEIR would not significantly change as a result of the project description changes. Removal of one opportunity site (601 Tamalpais Drive) would result in no physical change at this location, which is located in an urbanized area with trees. Therefore, the change in biological resources impacts associated with this site would be somewhat beneficial, as no trees would be removed and therefore, there would be no potential impacts associated with nesting bird. Additionally, the addition of 60 units across five sites and/or site-specific density or use changes would not substantially change the level of project impact previously identified. Therefore, the biological resources impact analysis prepared for the SEIR would still be adequate and the level of impact and mitigation measures identified would still apply to the proposed project. No further environmental analysis for the project with the proposed changes would be required.

Public Services

Introduction – Persons per Household

Public services-related impacts are determined utilizing population generation. The SEIR calculated the population increase of the proposed project utilizing the State Department of Finance's 2.47 persons per household figure for Corte Madera multiplied by the anticipated number of units from the Housing Element Update (883 residential units x 2.47 persons per household = 2,181 new residents by 2031).

The project description changes would result in 932 new residential units for a net increase of 49 new residential units over the 883 units evaluated in the SEIR. The proposed project changes include the elimination of 11 residential units (former Site 1) and up to an additional 60 senior residential units spread across five housing opportunity sites.

Using a similar methodology for the revised project, with a slight reduction in the persons per household for senior residential units (2 persons per household), the revised project would result in 2,154 new residents from the non-senior residential units (872 non-senior residential units x 2.47 persons per household = 2,154) and approximately 120 senior residents from the senior residential units (60 senior residential units x 2 persons per household = 120 senior residents) for a grand total of 2,274 new residents. This represents a net increase of 93 residents (4.3 percent increase) over the population evaluated in the SEIR.

Fire Protection

An increase in 93 new residents, or 49 residential units, over the project evaluated in the SEIR would not substantially increase fire protection services impacts previously identified. Developers of new residential project would be required to comply with the payment of a fee, per Mitigation Measure 11-1. Therefore, the fire protection services environmental impacts analysis prepared for the SEIR would still be adequate and the level of impact and mitigation measure identified would still apply to the proposed project. No further environmental analysis for the project with the proposed changes would be required.

Law Enforcement

The SEIR identified no environmental impact due to increased demand for law enforcement services as a result of the Housing Element Update. An increase in 93 new residents over the project evaluated in the SEIR would not substantially increase law enforcement demand. Therefore, the law enforcement impacts analysis prepared for the SEIR would still be adequate. No further environmental analysis for the project with the proposed changes would be required.

Public Schools

The SEIR identified a total of 619 new students generated as a result of the Housing Element Update and determined that no impact would occur due to an increased demand for public school facilities in Corte Madera. The revised project description would result in a net decrease in residential units that would produce school-age students as it is assumed the 60 new senior residential unit would result in no new student population generation, and the 11 multi-family units associated with former

Site 1 would no longer apply. Therefore, the public schools facilities impact analysis prepared for the SEIR would still be adequate. No further environmental analysis for the project with the proposed changes would be required.

Parks and Recreation

An increase in 93 new residents, or 49 residential units, over the project evaluated in the SEIR would not substantially increase demand for parks and recreation facilities and the associated environmental impacts previously identified in the SEIR. Developers of new residential project would be required to comply with the requirement to provide active and/or passive recreational amenities, per Mitigation Measure 11-2. Therefore, the parks and recreation impact analysis prepared for the SEIR would still be adequate and the level of impact and mitigation measure identified would still apply to the proposed project. No further environmental analysis for the project with the proposed changes would be required.

Utilities

Utilities impacts are determined utilizing population generation. Therefore, refer to the revised population generation discussion above under public services for additional context for the revised utilities impacts discussion that follows.

Water Supply and Service

An increase in 93 new residents (2,274 total), or 49 residential units, over the project evaluated in the SEIR would result in an increased demand of approximately 284,250 gallons of water per day. This represents a 11,250 gallons per day increase (or a four percent increase) over the project evaluated in the SEIR, which anticipated an increased demand of approximately 273,000 gallons per day. This is not a substantial increase in the water demand evaluated in the SEIR, and therefore, the analysis in the SEIR would still be adequate. Developers of housing projects would still be required to comply with the mitigation measures identified in the SEIR. No further environmental analysis for the project with the proposed changes would be required.

Wastewater

An increase in 93 new residents (2,274 total), or 49 residential units, over the project evaluated in the SEIR would result in an increase of approximately 181,920 gallons of wastewater per day. This represents a 7,440 gallons per day increase (or a four percent

increase) over the project evaluated in the SEIR, which anticipated an increased demand of approximately 17,480 gallons of wastewater per day. This is not a substantial increase in the wastewater generation evaluated in the SEIR, and therefore, the analysis in the SEIR would still be adequate. Developers of housing projects would still be required to comply with the mitigation measures identified in the SEIR. No further environmental analysis for the project with the proposed changes would be required.

Solid Waste

The SEIR determined that no environmental impact would occur due to the generation of solid waste in Corte Madera as a result of the Housing Element Update. An increase in 93 new residents, or 49 residential units, over the project evaluated in the SEIR (four percent) would not substantially increase in solid waste. This is not a substantial increase in the solid waste generation evaluated in the SEIR, and therefore, the analysis in the SEIR would still be adequate. No further environmental analysis for the project with the proposed changes would be required.

Electric Power, Natural Gas, and Telecommunications

As discussed in Section 12.4 of the SEIR, most of the development facilitated by the Housing Element Update sites would occur within already developed sites within areas of the Town that are already served by existing natural gas and electric power utility infrastructure. Although future housing sites would require connection to these existing facilities, and the undergrounding of electrical lines will be required, individual utility infrastructure improvements and relocations would not result in environmental impacts beyond those identified throughout the SEIR and would be further evaluated in their respective subsequent environmental documents for discretionary projects. An increase in 93 new residents, or 49 residential units, over the project evaluated in the SEIR would not substantially increase in electric power, natural gas, and telecommunications demand. Therefore, the utility impact analysis prepared for the SEIR would still be adequate and no further environmental analysis for the project with the proposed changes would be required.

Tribal Cultural Resources

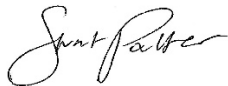
Tribal cultural impacts associated with the proposed project and identified in the SEIR would not be increased or decreased as a result of the project description changes, with the exception that one housing site is being removed from the draft housing element

update. Tribal cultural resource impacts are associated with the geographic area identified in the SEIR as the entire Town of Corte Madera. Therefore, removal of one opportunity site as well as the additional of 60 units across five sites and/or site-specific density or use changes would not change the level of project impact previously identified. Therefore, the tribal resources impact analysis prepared for the SEIR would still be adequate and no further environmental analysis for the project with the proposed changes would be required.

Conclusion

Based on our review of the proposed project changes, the conclusions, impact determinations, and mitigation measures identified in the SEIR are still applicable and adequate. No changes to the SEIR are required and no additional environmental analysis associated with the proposed project will be required.

Sincerely,



Stuart Poulter, AICP, MRCP
Senior Planner



Teri Wissler Adam
Senior Principal

Cc: Adam Wolff, Interim Town Manager

Attachments:

Attachment A - Revised Opportunity Sites Map

Attachment B - Updated VMT Analysis Memo (prepared by Hexagon Transportation Consultants, dated December 5, 2022)