

Mr. Neal Osborne  
Marin County Community Development Agency  
3501 Civic Center Drive, Room 308  
San Rafael, CA 94903



January 25, 2011

Re: Southern Counties Oil Company Master Plan Amendment, Precise Development Plan Amendment, Tentative Map Waiver & Use Permit

Dear Mr. Osborne:

The Marin Conservation League is concerned that the above referenced project proposal is on a site that is 500 feet from Richardson Bay in an area of known flood hazard, subject to potential tsunami and the effects of sea level rise. The Negative Declaration states the following: "The design of the project would provide a finished floor elevation above the top of the slab at 13.08 feet NAVD (roughly equivalent to Mean Sea Level) where the ground elevation will be leveled to 9.7 feet NAVD. The height of the finished floor would account for settlement of the structure within 100 years and would maintain compliance with the 100-year base flood elevation. Sea level rise will likely change the base flood elevation over this time frame, and it is recommended that the building design include adjustable connections to the foundation to allow for raising the structure above the base flood elevation after long-term settlement and sea level rise. No significant effects (emphasis added)."

The statement acknowledges that sea level will rise, although the time frame cannot be predicted with any precision. Sea level rise will occur not as a gradual phenomenon but rather will be evident in episodic events such as extreme high tides and storm surges. The extraordinary construction techniques required for this project point to the problematic nature of the location, but do not address the increasing probability that such extreme events will occur in the foreseeable future. At what point might the structure have to be raised?


Even though this is a previously developed site, surrounded by other buildings, and the proposed use is consistent with applicable plans, the proposal raises issues that the County should address in a broader way. The effects of the recent high tides show that the site is now subject to flooding and will become more vulnerable as sea levels rise in the future. Furthermore, even if the building itself is secure during floods, access throughout the area has proved difficult during flood events even under today's sea level conditions.

The County, working with other Marin jurisdictions, should initiate studies to determine the effects of climate change on low-lying areas, and what comprehensive planning policies can address these changes. Properties surrounding Richardson Bay are particularly

vulnerable. It is not enough to mitigate the impacts of individual projects; these mitigations could have broader off-site impacts in the foreseeable future. We suggest that the Initial Study should discuss these potential impacts in the Geophysical and Water sections and recommend appropriate mitigation measures that may, in turn, influence future policy for these areas.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nona Dennis", written in a cursive style.

Nona Dennis,  
President

cc: Supervisor Charles McGlashen