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Via Email: AWolff@ci.corte-madera.ca.us



Protecting Marin Since 1934

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Re: Corte Madera Inn Rebuild Project, DEIR

Dear Mr. Wolff:

Marin Conservation League has reviewed the DEIR for the Corte Madera Inn Rebuild project and has the following requests for information. Our comments are generally limited to the DEIR's sections on "Biological Resources," "Hydrology and Water Quality," and "Transportation/Traffic."

## Summary

Table 2-2, p. 2-14. This table, summarizing project impacts and mitigation measures, does not include a list of the Town's general plan policies with which the project could be in conflict, but refers the reader to other sections of the EIR. Please identify the policies, as has been done in this table with impacts and proposed mitigation measures for other EIR topics. Although some of these are discussed in other parts of the EIR it would be helpful to have the list in this table under "Land Use and Planning."

## **Project Description**

In the project overview, please provide information on conditions of approval for the existing facility.

P. 3-6. In the description of the building design it is stated that the building height is a maximum of 35 feet, except for the towers (38.5 feet). Do these height numbers include any fill placed on the site prior to construction? If not, clarify what the total height would be, including any required fill, for the existing project.

P. 3-6. The description of the square footages of permeable surface omits 26% of the site which, presumably, is for landscaping and pool. Please verify.

Figure 3-4 (p. 3-7). This figure does not show a north elevation. Please provide.

Environmental Setting, Impacts and Mitigation Measures

<u>Biological Resources.</u> The 2001-02 bird surveys in Appendix A, also discussed on p. 4.3.5 in this chapter, reports bird counts at Edgewater Pond and for Shorebird Marsh. These habitats are quite dissimilar. Please describe the habitats, including type and size, and explain the purpose of the dual survey.

The DEIR proposes (p. 4.3-21 in this section) that most mitigation for this project would be at the Burdell Ranch Wetland Conservation Bank in northern Novato. Mitigation this far from the project would not add to the Town's environment, and would be less likely to fulfill the objective of replicating

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the destroyed habitat. Proposed mitigation should be as close as possible to the project site, at a minimum in the same watershed. Please identify mitigation sites within the project watershed, or as close as possible to the project, which could provide habitat the same as that removed by the project.

<u>Hydrology and Water Quality.</u> Preliminary updated flood insurance rate maps have been prepared and should be included.

Discussions of flood control practices in the Town refer to 2005 studies. These pre-date public and agency focus on sea level rise. Rising bay waters will increase localized flooding and storm surges in bayfront communities. Is there information pertinent to flood management in the project area that is more current than 2005? Provide data that considers how bay water elevation changes would affect the project vicinity. Explain how these would be addressed by the flood management system.

Discussion under "Stormwater Drainage and Flood Control System" includes a statement that flood hazard zone data indicates that additional measures may be required in the project site vicinity to address flooding hazards in the future.

Please describe impacts on the project site vicinity as bay water elevation rises, during the reasonably foreseeable life of the project. The site vicinity includes the Town Center, Madera Gardens, Madera Blvd, Tamal Vista Drive, and office structures to the north. Project features that could affect the flooding potential of these areas include, for example, diminished pervious surface and loss of floodwater retention due to filling the pond. BCDC/OCOF provide information regarding flood and storm events in the project area which could be helpful in the EIR's sea level rise discussions.

Mitigation Measure HYDRO-1b, does not appear to take into account stormwater volumes that could be generated under estimated bay water elevation changes over the next few decades.

Please describe flood control system operations with removal of the Inn's pond/detention basin and the projected rise in bay water elevations. Also describe management tools that could allow the pond to be used, if it remains, as a detention basin during heavy rainfall or high tides under the sea level rise scenarios.

<u>Transportation/Traffic.</u> Table 4.12-4 indicates that the project will generate 868 additional trips while Appendix G includes the statement, "We expect traffic counts for the existing restaurant and hotel to be similar to those generated by the proposed hotel only development." No current restaurant traffic counts are provided.

Table 4.12-4 is poorly labeled. The top section SEEMS to represent trips per room but nowhere is that stated.

Given the uncertainties of traffic projections, consideration could be given to more limited parking and holding space in reserve should needs arise. This policy has been used in Palo Alto without the need to convert the reserve space.

Tables 4.12-6 and -12 list three segments for Madera Blvd, whereas only two segments exist and are described on page 4.12-1. Please clarify "Madera Blvd. west of Highway 101 ramps."

In Table 4.12-6, the entry for Tamal Vista Blvd., north of Madera AM Peak Hour, Existing+Project is missing a digit. Please correct and verify that the volume difference is in fact 14 as listed.

The project does not include accommodation for large vehicles (buses, long trailers). Parking these vehicles on Madera Blvd. (as currently occurs) limits sight-lines and presents a safety hazard. Demonstrate how such vehicles could be accommodated on site.

Thank you for this opportunity to comment. We look forward to your responses.

Yours truly,

Jon Elam President