

Santa Rosa Office 555 Fifth Street, Suite 300 A Santa Rosa, CA 95401 (707) 575-3661

August 1, 2019

Jason Fried, Executive Officer Marin LAFCO 1401 Los Gamos Drive, San Rafael, CA 94903

VIA EMAIL

Re: San Rafael Regional Municipal Services Review - Greenbelts and Community Separators

Dear Executive Officer Fried and LAFCO Commissioners,

Greenbelt Alliance urges Marin LAFCO to consider adding recommendations on greenbelt protections and community separator designations to the draft San Rafael Regional Municipal Services Review. We urge you to recommend that LAFCO, the County of Marin, Marin County Open Space District and relevant Special Districts to work together to identify and designate appropriate lands within the review area as priority greenbelts and community separators and to protect them from urban development.

Greenbelt Alliance believes that County and City inter-agency jurisdictional coordination is imperative for the implementation of MCOSD strategic plan policies in the County of Marin.

Specifically, Greenbelt Alliance urges you to recommend that:

- St. Vincent's and Silveira lands be prioritized for permanent open space protection
- Upper Sun Valley undeveloped open space be added to open and park lands
- Los Ranchitos community be designated a Community Separator and realigned more closely with the County rather than inside the city's SOI.
- Other lands that are rural and low density and that serve to separate communities in Marin County should also be so designated.
- Community Separators be defined based on existing policy in Sonoma County that prevents intensification of development over existing land use and zoning (attached).

Making such recommendations in the San Rafael Regional MSR for agency collaboration and open space protection aligns with the LAFCO's mission under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 to promote and coordinate the efficient delivery of local government services and encourage the preservation of open space and agricultural lands.

## Marin County Lands at Risk

While Marin County has far less greenbelt land at risk of development than most other Bay Area counties (11,600 total acres), a total of **2,400 acres are at high risk**, where development is likely in the next 10 years.



Greenbelt Alliance identified the 1,110 acres of the St. Vincent's and Silveira area as the largest greenbelt area at risk of development in Marin County in our current At Risk report (see attached pages).

As described in the draft San Rafael Regional Municipal Services Review, the area serves as a physical and visual separator between the cities of Novato and San Rafael. These lands are currently used by a boys' school and for agriculture.

These incredible grass and tidal lands are no longer in City of San Rafael's Sphere of Influence or destined for annexation. However, County of Marin General Plan provides for urban development of a portion of St. Vincent's/Silveira west of the Northwest Pacific rail line and for continued urban use, which is now within the Marinwood CSD's SOI.

For decades, this has been a contested landscape. While earlier proposals planned to cluster homes and prioritize open space, new discussions include spreading homes out over the site, consuming more natural lands. Though Marin very much needs affordable homes, they would be more appropriate in already-developed areas where residents can be close to services, schools, and jobs.

Identifying these lands for permanent open space protection across relevant agencies and policies is the appropriate way to prevent sprawl development and maintain community separation.

The attached pages from our At Risk report provides an overview of other lands within the San Rafael Region and across Marin County that we hope LAFCO and other relevant agencies will consider for additional protection from development. The Marin Independent Journal article, attached, also provides a summary of the At Risk findings.

## Novato Municipal Service Review Update

Greenbelt Alliance is interested in the update of the Novato Municipal Service Review. It appears to be on the calendar for updating but we have not received any notifications to date. Our experience working with the City of Novato in 2017 to renew its voter-approved Urban Growth Boundary brought to light a number of planning and policy issues that need to be addressed by LAFCO in an MSR.

Thank you for your consideration of our views. We look forward to a response and to meeting the new Executive Officer.

Sincerely yours,

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Teri Shore, Regional Director, North Bay

greenbelt.org Page 2 of 2