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Hard Copies Mailed To County Of Marin Officials Listed On Page 14

**RE: Comments from the San Geronimo Valley Stewards
County of Marin - Draft April 2017 Supplemental EIR**

San Geronimo Valley Stewards thanks the Marin Community Development Agency and Marin County Counsel for their diligent and professional work on the SEIR draft. We appreciate the research of Stillwater Sciences in this difficult assignment.

Our comments are made with the intent of improving the SEIR and providing more information, so the County can move forward with a 2018 Countywide Plan and a new stream ordinance. Mitigation steps which require taxpayer dollars should be informed by data to make the projects effective.

SG Valley Stewards supported adoption of the 2013 Marin County Interim Stream Conservation Area Ordinance. The 2013 Ordinance was also supported by Marin Conservation League, Marin Audubon Society, and other responsible conservation groups. Unfortunately, it never took effect in San Geronimo Valley because Spawn sued to stop it, which triggered the "poison pill" clause. The 2013 Ordinance governed the other unincorporated areas of Marin, until sunset by its own terms in April 2016.

Why the SEIR is Important to 800 Families Living in Existing Homes Near the Creeks.

The draft SEIR evaluates only one development scenario--a full build out of 358 new units. (SEIR pages 2-25 to 2-45.) The SEIR recommends mitigating the impact of full

build out by adopting a new stream ordinance, with strict adherence to 100-foot setbacks, discretionary design review, and hiring expensive experts for every activity within the stream conservation area. (SEIR pages 5-12 to 5-22.) The SEIR recommendations are similar to the Tier 3 stream permit required for large new house construction under Marin's 2013 interim stream ordinance.

The SEIR makes no mention of exceptions or exemptions for small improvements to existing homes, most of which were built in before 1980 on small lots within 100 feet of streams. In suggesting a mitigation ordinance, the SEIR should acknowledge the precedent of the 2013 ordinance Tier 1 and Tier 2 permits for small projects. Consider for an existing home a handicap ramp, children's play structure, garbage can enclosure, vegetable garden, or driveway paving. Do these small projects justify discretionary design review, Planning Commission hearings, and appeal to the Board of Supervisors?

Since the 2007 Countywide Plan, Marin County has recognized the crises in affordable housing, especially in West Marin. Second units and junior second units are the least expensive and fastest way to add housing, privately financed, without taxpayer dollars. A 350 square foot addition to an existing house can create a new bathroom and studio/bedroom. This would provide caregiver housing for a senior, or enable a homeowner to rent space for workforce housing.

Marin Community Development Agency has recommended that a stream ordinance should follow guidelines for "CASE": The ordinance should be Clear, Affordable, Simple and Enforceable.

SUMMARY:

SGV Stewards respectfully request the following corrections and additions be made to the Draft SEIR before it is approved by the Board of Supervisors:

- A. Amend the SEIR to also evaluate two reasonably probable developments with lesser impact on habits; Building 108 new houses, and /or permitting small improvements to existing homes. Calibrate the new stream ordinance (suggested as a mitigation measure) to the lesser impacts of these projects.
- B. Recognize and accommodate geographic constraints, by studying the impact of a 35-foot setback for existing homes on small lots near the creeks.
- C. Do not place regulatory obstacles to fire prevention. Vegetation and tree management is dictated by state law, our fire insurance policies, and the Marin Fire Department. Fire conflagration would be a disaster for the San Geronimo salmon species.
- D. Provide more information and hard data on: How TIA is measured under existing conditions, impervious area caused by roads and paved surfaces, current and historic water flows, sediment impact on watershed lands owned by exempt parties (government agencies and agriculture), and effect of septic effluent on groundwater.

E. Clarify SEIR guidance on the proposed Mitigation Ordinance: Can homeowners rebuild after disaster? Who performs and pays for site assessments?

1. Development is Over-Estimated and Link to Potential Impacts is Uncertain.

SEIR at page 5-2 states, "The cumulative impact analysis implicitly acknowledges the difficulties of showing direct links between land-use activities and in stream conditions, and so the predictions of impacts are of necessity qualitative and conservative (i.e., potentially over-estimated), except where sufficient quantitative information is readily available."

Even under the 358 unit full build out scenario, SEIR finds Total Impervious Area (TIA) might increase by only 5%. That is, 14.1 additional acres of TIA might be added to existing conditions of 301 acres of TIA. This could result in percentage increase of less than three-tenths of one percent (0.3%). (SEIR pages 2-30 and 2-31.)

SEIR admits the the number and scale of 358 additional units may be over-estimated, but fails to evaluate the more realistic scenario of about 100 vacant lots that may be potentially buildable. SEIR page 2-29 states: ". . . remaining parcels zoned for future development tend to have significant environmental constraints, which either substantially increase construction costs or preclude development altogether (e.g., inadequate percolations for on-site septic systems, lack of access via paved roads, steep topography necessitating engineered foundation designs."

Planning Commissioner Desser correctly asked on May 22, 2017 why the SEIR could not research and estimate the vacant lots that are actually buildable? She suggests many lots appearing on the Assessor Parcel Maps may be tiny "paper streets" and pocket parks left over from pre-1920 subdivisions that were never completed. Could many of the 358 paper lots be eliminated by simply looking at their size and configuration?

The 2010 Salmon Enhancement Plan (SEP) states that Assessor Maps show 203 unimproved single family residential parcels partially or fully within the SCA. Of those, 108 lots cannot contain 3,000 square feet of development outside the SCA.

SEP pages 2-27 and 2-28. Stillwater Sciences assisted Prunske Chatham in preparing the 2010 SEP report, based on the 2009 Existing Conditions Report (ECR) prepared by Stillwater Sciences. SPAWN participated in the Advisory Group for the ECR and SEP.

There may be about 108 residential parcels that, if developed, would require construction within the SCA zone.

2. CEQA Requires SEIR Evaluate Reasoned Alternatives.

Section 15126.6 of the CEQA Guidelines call for an EIR to evaluate reasoned alternatives that could feasibly attain most of the basic objectives of the Project, and that would avoid or substantially lessen any of the significant effects. However, the draft SEIR considers only a full build out of 358 new units, while admitting this estimate is over-stated and acknowledging the difficulty of linking this development to potential impacts on salmon. The full build out scenario is exaggerated and improbable. The SEIR draft is of little help to inform the County officials and residents how best to structure a new Countywide Plan and a new stream ordinance as mitigation.

Only 19 permits were issued for improvements on existing homes in 2016 for the SG valley. This compares to 1200 permits for the County as a whole. More importantly, all of the 19 permits were for remodels, new decks, or retaining walls. **No permits were issued for construction of a new home on a vacant lot.** (SEIR page 2-29.) These facts support the CDA estimate of 15 small project permit applications filed each year. (CDA Staff Report Oct. 29, 2013.)

Alternative development scenarios that represent more probable and less extensive future development in the SG Valley should be included in the final draft SEIR. The SEIR recommends a new stream ordinance as mitigation, and it should be appropriately calibrated to reflect realistic alternatives that will have less impact on our treasured salmon.

Planning Commission Staff report, May 22, 2017 states: "The analysis in this program SEIR is considered the first tier of environmental review, creating the foundation upon which future project-specific CEQA can build.." It is important this first step foundation be complete by evaluating reasonable alternatives, as well as the "full build out" scenario of the 2007 Countywide Plan..

It would also be most efficient for the County and individual homeowners for the draft SEIR to include now the more likely development scenarios. "A program SEIR can be incorporated by reference into subsequently prepared CEQA documents . . . This draft SEIR will help make the environmental review process for individual development applications more efficient . . ." Id. CEQA Guidelines recommend this tiered approach to eliminate repetitive discussion, and focus later reports on actual issues ripe for decision on particular projects. Id.

3. SEIR Should Evaluate Two Other Reasonably Probable Development Projects.

We request SEIR be amended to evaluate two other development scenarios that present more probable and less extensive future development in the SG Valley:

Scenario #2: About 108 new residences are built on vacant lots, with construction of about 3,000 sq feet of impervious area per lot, within the SCA zone. This could increase total Valley TIA by about 324,000 square feet (7.4 acres) --which is half of the estimated increase under SEIR Scenario #1 (358 new units). The Scenario #2

evaluation should consider County restrictions on septic, steep grade, ridge line protection, etc. as well as road access and MMWD water availability.

Scenario #3: Existing homes are permitted to add up to 350 square feet. If the 800 family homes now existing in the SCA zone are permitted to add up to 350 square feet (cumulative maximum over the life of the home). That could result in 280,000 square feet increase in TIA (6.4 acres).

It is probable that Scenario #3 would over-estimate development, because not all 800 families will make additions to their homes or will increase effective impervious area. If the County models a new stream ordinance similar to the 2013 ordinance, Tier 1 and Tier 2 permits for small projects would require best management practices to control sediment, and use pervious materials where possible.

An important difference from new building construction on a vacant lot, is that improvements to an existing home can be netted against removal of old impervious areas. For example, tear out the old hot tub, resurface the driveway with pervious drainage stones, etc. The result can be a net equality (or even a decrease) in effective impervious area. See SEIR page 2-28 (surface water drains into filtration runoff).

SEIR Table 2-12, page 2-41 posits there are 884 existing "units" which are partially or fully within the SCA. "Units" includes horse sheds, roads, schools, etc. SEIR page 2-29. Is it fair to assume 800 "units" might be single family homes?

The 2009 ECR report shows 1,371 single family residences in the entire valley, with median home size of 1,544 feet. 1995 Assessor's report shows 1,566 "living units" in the valley (which includes multi-family buildings).

4. SEIR Should Evaluate 35 foot Setbacks for Small Lots.

We recognize the SEIR is constrained by the stream setbacks in the 2007 Countywide Plan, which are 100 feet from top of stream bank for the Inland Rural Corridor, including the SG Valley. However, the SEIR should also look forward to the new 2018 Countywide Plan, by evaluating the cumulative impact of establishing a 35-foot setback for small already-developed lots in the SG Valley.

A 35 foot buffer is recommended by 2010 SEP report: "A minimum 35-foot buffer is recommended to guide enhancement on parcels that are already developed and to guide enhancement of riparian habitat on parcels proposed for new or re-development."

SEP page 2-21. "In areas constrained by existing development or on small vacant lots, a minimum 35-foot buffer from the active channel to new construction can ensure the protection or enhancement of riparian vegetation or function. The buffer can make a crucial contribution to filtering sediment and sediment attached pollutants, while also providing shade and natural bank stabilization." SEP pages 2-21 to 2-22. On San Geronimo Creek and major tributaries, a 35-foot buffer would allow construction of a 3:1 slope for stream stabilization and restoration projects. Id.

SEP states that a 35-foot setback "would also allow natural erosion processes as the stream adjusts to changes in the watershed and runoff patterns without jeopardizing structures, gardens, or other infrastructure. In areas where people are already living this zone is the key area to focus riparian enhancement activities." SEP page 2-22.

Other cities and counties use less than 100 feet as stream buffer: The town of Fairfax in Marin County calls for a 20 foot setback from the top of the creek bank, or twice the depth of the creek. [http://www.town-of-fairfax.org/html/tc .overview.html](http://www.town-of-fairfax.org/html/tc_overview.html).

Santa Cruz County uses a Riparian Corridor Setbacks of:

- 50 feet from each side of a Perennial stream;
- 30 feet from an Intermittent stream;
- 10 feet from Ephemerals; and
- 50 feet from Riparian woodlands.

See: www.codepublishing.com/Portals/2/County/Planning/env/Riparian

- Corridors and Required Setbacks.pdf

Marin CDA surveyed the average lot size and home size on the East side of SG Valley. On October 2, 2013, Marin CDA published a "Valley Home Size" chart to assist in consideration of a proposed community waste water project.

Location	Size	Home Size SQ. FT.	Lot Size SQ. FT.
Lower Woodacre Flats	Median	1,371	10,000
	Average	1,439	12,609
Upper Woodacre Flats	Median	1,604	13,282
	Average	1,727	15,918
San Geronimo	Median	1,790	18,800
	Average	1,790	18,810

The homeowner cannot fit a 100-foot setback on a 10,000 square foot lot (100 feet by 100 feet). Even on a 15,000 square foot lot, the 100 foot setback would leave the homeowner with only a 50 foot wide strip to fit his house, garage and septic.

Most homes along the main stems and major tributaries of creeks on the Valley floor would be rendered valueless and lose all meaningful use, if a 100 foot setback were to be enforced.

5. Who Performs and Pays for the Site Assessment?

SEIR recommends, as mitigation for a full 358-unit project, a new stream ordinance that requires permit and site assessments to be conducted by a qualified professional who is trained and certified. We have no objection to this requirement, but ask for clarification.

Would the homeowner on a small project (Tier 1 or Tier 2) be required to hire an expert and pay for the site assessment? Might there be a sliding scale of fees so that small projects are not burdened with costs that outweigh benefits?

Training and certifying a few CDA staff for this role may be cost effective. Another alternative is the County maintaining a list of qualified and certified experts, so the homeowner does not search the internet for a name. The homeowner should be allowed (if he requests) to hire his own expert.

6. Fire Prevention and Safe Vegetation Management Take Priority for Fish and Families.

SEIR recommends the new stream ordinance require a stream permit and site assessment for "any activity within the SCA that requires vegetation clearing . . ." SEIR page 5-12.

People are afraid: At the Stewards public meeting on May 16, 2017, **we learned that insurance companies have and are canceling home fire policies, or threatening not to renew, because of the high fire risk in the SG Valley.**

What assurances can the Board of Supervisors give to SG Valley homeowners that a New Stream Ordinance will not interfere with the homeowner's duty to comply with insurance demands that homeowners remove flammable brush and clear space around their homes?

The SEIR should be amended to exempt from stream permit/site assessment any vegetation clearing or tree branch laddering that is required by state law, a fire agency, or an insurance company that provides fire insurance to the property owner. Maintaining a 100-foot defensible space around each residence is required by California Resources Code section 4291.

A stream ordinance that would require the extra step of a stream permit and site assessment would discourage homeowners from taking the inexpensive vegetation management practices recommended by Fire Safe Marin. We are supposed to remove ladder fuels (low level vegetation) and cut grasses down to 4 inches, in the 100 foot defensible space around our homes. (See, "Ready, Set. Go" published by Marin Fire Chiefs.) Covered fire breaks, which maintain forest canopy and shrubs for stream bank stabilization, can be an attainable goal.

The SEIR should be described to state the disastrous environmental consequences of fire in the SG Valley. An intense burn could scour out the entire drainage system, and could be the tipping point that makes salmon recovery impossible. A fire hot enough to burn mineral soil changes the chemistry of the stream water, and chemicals from burned buildings and cars can sterilize the creeks killing off all aquatic life.

SG Valley faces an enormous risk of wild fire, similar to the conflagration that recently destroyed Lake County. We live in the Urban-Wildland Interface zone, which is recognized in the 2007 Countywide Plan.

The County adopted a strict tree ordinance in 2011. We don't need to duplicate regulations in a stream ordinance.

SEIR page 3-29 relies on a 1996 study of riparian tree canopy. This should be updated by the more recent MMWD surveys showing 80% shade tree canopy over the major fish-bearing streams. Clear cutting of trees or massive removal of brush simply does not occur. We experienced one incident in the past decade of someone cutting 5 redwood trees. The violators were caught and punished.

7. Home Re-Building to Existing Footprint Should be Permitted After Fire, Earthquake or Flood.

People are worried: If homes are destroyed by fire, flood, or earthquake, Would the SEIR require a new stream permit, or require new location siting on the parcel, or prohibit a family from rebuilding their home?

SEIR Mitigation Measure 5.1-1 (Expanded SCA Ordinance) should exempt from the stream permit requirements activity within the SCA zone for rebuilding a residence after destruction or damage by fire, flood, earthquake, or natural disaster, provided that best management practices are followed in construction (per CDA guidelines), and provided the "unit footprint" within the SCA is the same square footage as the destroyed or damaged structure.

The purpose of the Mitigation Measure is to prevent an increase in TIA. This is not a problem if the TIA of new construction has no net increase, compared to the destroyed or damaged the building it replaces.

8. SEIR Should Address Sediment Impacts Caused by Public Agency Watershed.

SEIR correctly identifies sediment from run off as impacting salmon. But SEIR places all the regulatory burden for sediment on private homeowners who control less than 25% of the SG watershed. Sediment caused by the other 75% of the watershed must be evaluated, in order to measure the effectiveness of mitigation measures (such as a new ordinance or taxpayer funded projects). We need to know the "before" and "after" of sediment measurements.

Stewards' review of Assessor Parcel Maps indicates that Marin County Open Space District owns 27% of the land in the SCA zone, and MMWD owns 12%. Lagunitas School District is also a large land holder. Agricultural land (ranch and two equestrian

centers) are exempt from any stream ordinance. Please see the SEIR land use map on page 2-22 and the SCA boundaries shown on page 2-43.

The SEIR should evaluate current and projected contributions of sediment flow from public and agricultural lands, as well as specialized parcels such as the golf course and Spirit Rock. Effective salmon protections require the County to appropriately allocate the regulatory burden of proposed new mitigation measures across all land owners.

9. Roads and Paved Infrastructure: Please Recalculate Impervious Area.

In April 2016, San Geronimo Valley Stewards (Steve Tognini) sent a letter to Marin County Counsel (David Zaltsman) requesting the SEIR correct the impervious area calculations found in the 2009 Existing Conditions Report prepared by Stillwater Sciences. Mr. Zaltsman kindly replied he would pass on the information. Can the County please confirm the 2009 ECR data gaps and errors did not find their way into the 2017 SEIR?

9 - A: SEIR page 2-28 states 90% of impervious area in San Geronimo watershed is attributed to roads (paved, gravel, other), sidewalks, parking lots, and driveways. Based on total 301 acres TIA, that would mean there are about 271 acres of road-type impervious areas? (SEIR page 2-30.) Stewards request sources, information, and how 271 acres of road/driveway/parking lots-related TIA was calculated?

Please note this 90% figure seems to greatly exceed the road-associated TIA reported by Tilley & Slonecker study (2007) where roads made up 28.2% of TIA in the SG Valley.

9 - B: There are only 36 miles of paved roads in San Geronimo Valley. (Cal RWQC Board 2014, page 158, *Fine Sediment Reduction Plan*.) The Jan 2009 Existing Conditions Report by Stillwater Sciences mistakenly assumed 251 miles of roads. Does the SEIR correct this error?

9 - C: The SEIR estimates how many square feet or how many acres of roads? SEIR page 2-24 describes "road density" as 7.4 miles/mi². (That excludes dirt unpaved roads under the USGS definition of impervious roads. SEIR Page 2-29.) Does the SEIR account for narrow width of our paved roads (less than the standard 36 feet wide)?

9 - D: The SG Valley has less than 3,000 feet of sidewalks. Does the SEIR correct the 2009 ECR error of assuming miles of sidewalks alongside our roads?

9 - E: SEIR page 2-29 describes 2005 existing conditions of 1,099 feet or road per "average building unit footprint" of impervious area. **How is this calculated?**

9 - F: Are roads, driveways, and paved infrastructure included in SEIR Table 2-12 page 2-41, calculating the increase in "improved units" from existing conditions to the proposed project (full build out of 358 units)?

10. What data supports the SEIR assumption there are 301 acres of TIA in SG Valley? How much TIA is attributable to existing family homes?

So much of the SEIR evaluation relies on estimates of impervious area, and many of its recommended mitigation steps focus on reducing impervious area, that attention should be focused on one key figure: 301 acres of Total Impervious Area under existing conditions.

This figure seems to appear only once, in Table 2-5 page 2-30: "TIA (ac) 301.4" in the column "Existing Conditions (2005)".

Footnote 1 page 2-30 lists as the source: "Data provided by Marin County CDA in 2005." It assumes no substantial development in the Valley since 2005, and therefore no change to the number of improved parcels, units or TIA. **(All building and development was stopped for 37 months from Feb 2008 to October 2013, by moratoriums and injunctions demanded by SPAWN.)**

The Stewards respectfully request access to the CDA data supporting 301 acres of TIA. We don't wish to cause substantial delay or create unnecessary paperwork, but this 301 acre estimate is key to the entire SEIR report.

Also, our review of the 2009 ECR report revealed major errors and inconsistencies in describing TIA caused by infrastructure and private development. **For example, some Parcel Maps still show the east side of Flanders Ranch as "institutional" because it was once zoned for a future high school. It is cow pasture.**

The County deserves a second look at the factual basis for this 301 acre assumption of TIA. Would it be informative to test the estimate of 301 acres TIA against the 2013 LIDAR map, which blue-lined the stream conservation area? Perhaps check with the geophysicist in the Community Development Agency?

Stewards estimate 150 to 200 acres of TIA for the SG Valley, some portions of which are not located within 100 feet of any stream. We request supporting data and welcome corrections:

A. 36 miles of paved roads. 15 miles (SF Drake Blvd and SGV Drive) are about 36 feet wide. The remaining 21 miles are about 22 feet wide.

B. 3000 feet of sidewalks around the Lagunitas School, the SGV Community Center, and the Golf Club.

C. 20 non-residential buildings or institutions (10 of which * will be exempt from any stream ordinance, as government-owned or agriculture):

*One ranch

*Two equestrian centers

*Four U.S. post offices (2000 SQ feet each)

*MMWD Water Treatment Plant

*Marin County Fire Dept

*Lagunitas Elementary & Middle Schools

SG Valley Community Center

SG Valley Golf Course, club house and parking lot

Two churches (including one Child Care Center)

Spirit Rock Retreat

Woodacre Improvement Club

Lagunitas (one store and one small commercial building)

Forest Knolls (four stores)

Woodacre (one store)

San Geronimo (one store)

D. 1371 single family residences, with median home size of 1544 square feet, were described in the 2009 ECR. (This figure should be checked with County Assessor.)

Please note the smallest homes are those built decades ago, close to the fish-bearing main channels of creeks. After allowing for driveways and decks, we estimate all the TIA for existing family homes does not exceed 50 acres, after allowing for driveways and decks.

The 2009 ECR states the SG Valley watershed is 6,000 acres. Does SEIR agree with the ECR on this fact?

It appears that TIA attributable to existing family homes is **LESS THAN ONE PER CENT** "in numbers 0.83%" of total acreage in the SG watershed, under existing conditions.

11. SEIR Should Provide More Information About Winter Water Flows.

The SEIR repeatedly cites high velocity and force of water flows as impacting salmon. (See SEIR pages 5-15 to 5-18, for example.) SEIR concludes that landowner activity increasing total impervious area will exacerbate high velocity water flows.

Yet the SEIR does not describe or measure what are the water flows, especially in winter. SEIR pages 3-24 to 3-26 describes current conditions on water quality and flow as "unknown" or "data inconclusive".

This information should be readily available from MMWD, which has measured since 1980 water flows in San Geronimo Creek at the Lagunitas Bridge. USGS agency also measures creek flows in S.P. Taylor State Park.

Is water flow information available for the smaller tributaries such as Montezuma Creek and Woodacre Creek? Can the information flow statistics be matched against drought years? Can the report highlight years of natural floods?

12. Future Groundwater Studies Should Include Septic Effluent and Landscape Irrigation.

Stewards appreciate the County's decision to undertake a voluntary study of groundwater pumping (wells) and surface water diversions. (SEIR page 5-26, Voluntary Mitigation Measure 5.3-1.)

We recommend the groundwater study also consider the effluent discharge from home and institutional septic systems, as well as landscape irrigation. The average household places about 150 gallons per day of water into the ground.

Conclusion

We recognize the SEIR was commissioned as the result of litigation. SG Valley Stewards ask that the SEIR be corrected and improved, so it can serve the practical function of guiding future decisions on the 2018 Countywide Plan, a new stream ordinance, CDA guidelines for homeowners, and effective projects for habitat. The SEIR is the first tier foundation in a series of impact reports. Let's make it complete.

The U.S. Supreme Court has ruled unanimously that government conditions on use and enjoyment of private land must have a nexus and a rough proportionality to the actual impacts of the proposed development. *Koontz v. St. Johns River Water management District*, 570 U.S. 2588 (2013).

THANK YOU FOR YOUR ATTENTION TO OUR COMMENTS AND CONCERNS.

San Geronimo Valley Stewards Protect Families and Fish



We are a non-profit whose mission is to protect families and fish in the San Geronimo Valley. We have over 400 members, donors, and supporters, who live in about 800 homes near Valley streams.

We are all volunteers; we have no paid staff; and we are not funded by taxpayer dollars.

Our inspiration is Dr. Elinor Ostrom, the winner of the 2009 Nobel Prize in Economic Science. Her studies demonstrate fisheries and other natural resources are best managed by local communities. Dr. Elinor Ostrom, *Governing the Commons: The Evolution of Institutions for Collective Action*, Cambridge University Press (1990).

SG Valley Stewards collaborate with County agencies and Marin Resource Conservation District to sponsor educational programs and events for healthy creeks. We host public programs on fire prevention, woody debris in creeks, removal of invasive species, and legislative actions to protect aquatic habitat. Stewards' annual litter removal squad regularly clears trash out of creeks and from roadways.

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