



**Sample Comment Letter re: Housing Element Draft**

Subject: **Public Comment on Housing Element Draft July 2022**

To: **Danielle Staude**, Senior Planner <dstaude@cityofmillvalley.org>

cc: <jwickham@cityofmillvalley.org>, <smcentee@cityofmillvalley.org>, <ucarmel@cityofmillvalley.org>, <sburke@cityofmillvalley.org>, <mperrey@cityofmillvalley.org>

Thank you for the opportunity to share feedback on the Housing Element Draft. I am submitting my comments via this email rather than the online survey. Please include my email in the August 1 City Council packet.

- **Comment on Chapter 1 of Housing Element Update**

**The City's Exclusive Focus on Areas East of Camino Alto.** The City's housing strategy focuses on the need for affordable workforce housing, citing two prominent downtown business owners. While this is an appropriate goal, it appears the City plans to continue its practice of locating all affordable housing east of Camino Alto, summarily excluding many areas of Mill Valley such as the entire downtown area (despite many potential infill opportunities), all areas near Boyle Park or the golf course, and the hills. The City's exclusive focus on the areas east of Camino Alto for affordable housing promotes the perception of discrimination by further segregating the city economically and racially. The City needs to reconsider this housing strategy. [See diversity statistics in this neighborhood.](#)

- **Comments on Chapter 3: Housing Resources**

**Improper Pre-Selection of 1 Hamilton Site.** The City's site selection for affordable housing is flawed. By pre-selecting the 1 Hamilton site for affordable housing, the City bypassed the comprehensive selection process used for all other parcels in the city. And after excluding 1 Hamilton from the city-wide analysis, the City then turned around and included units from the proposed 1 Hamilton project to meet its affordable housing goals.

**Certain Neighborhoods Treated Preferentially.** The City must explain why it has now removed 3 of the 4 sites identified as appropriate for affordable housing by its own paid consultant, The Housing Workshop, leaving only the 1 Hamilton site. In addition, the City seems to be relying on the thinnest after-the-fact justifications for excluding sites west of Camino Alto, preferentially applying criteria such as fire zone, historic zone, flooding zone and active recreation.

**Fire Danger Used to Keep Affordable Housing out of Certain Neighborhoods.** Fire is an obvious concern everywhere in Mill Valley, and it is worth noting that the City fails to account for the fact that residents all over the City have had insurance policies cancelled – not just residents west of Camino Alto. Why does the City exclude neighborhoods west of Camino Alto from affordable housing due to fire danger, but not exclude those same neighborhoods from the City's ADU program, which also increases density. Improper

**Use of 'Historic Overlay Zone'.** The City relies on its 'historic overlay zone' to exclude the downtown area from consideration for infill housing. The historic zone applies to less than 30 structures (not to parcels or entire neighborhoods), and merely adds some design requirements – it does not prohibit renovation or use for housing.

**Illogical Reliance on 'Active Recreation'.** The City excluded several sites from consideration on the basis that they have 'active recreation.' There is no more active recreational site in the City than Hauke Park. Virtually every Mill Valley child involved in sports has used the park. Yet the City wants to build a dense, 4+ story structure overlooking this beautiful, serene children's park. Further, the City now plans to provide 'supportive housing' at 1 Hamilton, which may include chronically homeless and mentally unstable patients. Yet the City excluded a vacant lot west of Camino Alto when the only 'active recreation' was a once-a-year neighborhood Easter egg hunt. The City also promoted active recreation at one of the sites under consideration – the golf course – approving \$1.7million in investment to restore active use, despite severe drought conditions. The restoration virtually guarantees that site will forever be excluded from consideration, and in fact was removed from the Housing Element site inventory.

**All of these facts lead to the perception that the City is manipulating the site selection, and engaging in systematic discrimination by protecting the wealthier, less diverse neighborhoods west of Camino Alto.**

- **Comment on Chapter 4: Housing Plan**

**Maintaining Mill Valley's Small Town Character.** Chapter 4 states that a goal of the Housing Element is to "ensure that new development is compatible with Mill Valley's small town character and many environmental, community and neighborhood and scenic attributes." However, the 1 Hamilton project could not be more incompatible with this goal. The size, density and location of the project are not only at odds with Mill Valley's small town character, but also incompatible with the neighborhood of mostly single family homes. Further, the project will increase traffic and congestion at the worst intersection in the City.