



November 8, 2021

Marin County Parks and Open Space

Attention: Max Korten

Submitted via email: mkorten@marincounty.org

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Re: Marin County Parks: Measure A Renewal

Dear Mr. Korten,

The Environmental Action Committee of West Marin (EAC) is a local environmental nonprofit based in Point Reyes Station. Since 1971, we have been working to protect the lands, waters, and biodiversity of coastal Marin County.

We are writing today with comments regarding the upcoming proposed renewal of the Measure A one-quarter cent sales tax measure “to fund conservation, wildland fire fuel reduction and vegetation management, farmland preservation, deferred maintenance in open space and park preserves, and projects that protect the natural beauty of the County of Marin.”¹

We support the renewal of Measure A funding, but would like the County to use this opportunity to think bigger and broader and update the allocations in the context of the highest and best use of taxpayer funds for the future preservation of public lands and restoration that provides multiple environmental co-benefits like clean air, water, climate resilience, and public access.

Since the existing Measure A expires in March of 2022, it is urgent that a measure be placed before the voters next June to continue this critical funding, but with an update of the funding allocations to meet the current community needs.

Our comments are focused below in specific topical areas for consideration by the Board of Supervisors and Marin County Parks and Open Space in this funding review process including:

1. Reconsideration of the Farmland Preservation Allocation
 - 1.A. Farmland Preservation: Highest and Best Use of Public Funds?
2. Other Possibilities for Highest and Best Use of Public Funds
 - 2.A. Tribal Land Acquisition and Partnership
 - 2.B. Nature-Based Climate Change Mitigations and Ecological Restoration

¹ *Marin County Parks Community Survey Staff Report*, October 19, 2021. Available at: http://marin.granicus.com/DocumentViewer.php?file=marin_3ea766867e69a400cd1822c8f833ea73.pdf

3. The Biodiversity Crisis
4. Expanding Equity and Tribal Programming
5. Public Access
6. Public Land Acquisition to Prevent Fire Risk

1. Reconsideration of the Farmland Preservation Allocation

Ordinance Number 3586 outlines the intent of the 20 percent farmland allocation, “The purpose of this Program is to protect Marin County farmland at risk of subdivision and development and preserve Marin's working farms and ranches.”

A review of the 2015-2020 Marin County Parks and Open Space Annual Report budgets indicate that \$10.5 million dollars has been allocated to farmland preservation or an average of just above \$2 million dollars per year. Marin Agricultural Land Trust (MALT) currently holds 91 agricultural easements and is currently protecting 54,000 acres (or 32 percent) of the about 167,000³ agricultural acres in the County (See Attachment List of Figures: Figure 1 and Figure 2).

It is unclear how the language of the original ordinance is applied. There are not any Key Performance Indicators (KPIs) to measure the successful implementation of this program.

- When does the County consider farmland preservation a success? Is it a measurement of acreage? Geographic location? Ability to block inappropriate development? Preserve key ecological features? Maintain sufficient agricultural infrastructure to allow farming to continue?
- How does the County identify and prioritize potential agricultural properties to retain in a conservation easement?
- How many agricultural properties could be at risk from development and subdivision based on their parcel size and geographic location to urban centers?

It is unclear how the applied decision-making process identifies agricultural properties most at risk from development and subdivision. The County has A-60 zoning for most of the agricultural properties in the unincorporated areas that already limits development and subdivision. In the coastal zone, the Coastal Act severely limits conversion of farmland to non-agricultural uses.

We note the importance of appropriate and meaningful KPIs to better understand when this strategy to preserve agricultural production in the County is considered a success. (We note; in comparison, the County has yet to establish any limit on the number of second homes or short-term rental properties that continue to negatively impact the residential communities of unincorporated areas of the County that are also essential to the long-term health of our communities.)

² Marin Agricultural Land Trust, *Where We Work*. Accessed October 15, 2021. Available at www.malt.org/where-we-work.

³ University of California Cooperative Extension, *Amazing but True Facts about Marin Agriculture*. April 2011. Accessed October 15, 2021. Available at: www.ucanr.edu/sites/uccemarin/files/30457.pdf

If funding for farmland preservation were to continue, we recommend additional language is included in a draft ordinance that includes appropriate KPIs and a more clear publicly defined framework by which properties are identified and selected. Specific metrics are important to identify, so that the public and partner nonprofits are clear on the framework, guidelines, and sunset dates on funding allocations.

1.A. Farmland Preservation: Highest and Best Use of Public Funds?

The use of public funds for preservation of private property agricultural lands deserves further scrutiny. The 20 percent allocation of public funds at an average of \$2+ million dollars annually is a considerable amount of funding when compared to other funding efforts to maintain and improve publicly accessible lands, provide public education, and conduct scientific research.

A comparison of the total expense allocations from 2015-2020 dedicated to improvements to trails and roads, wetlands and erosion control, public education, and scientific research is a total of almost \$11.5 million dollars (16 percent of the total funds) or *\$3 million dollars less* than the total allocation in the same time period to MALT for farmland preservation. Yet the \$11.5 million dollars was meant to address multiple purposes.

The review of the Measure A Survey Results indicates the public would like to see funding for additional transportation, education, enforcement, and interpretation to improve access, maintenance, visitor experience, and scientific research on public lands. The area with the least public support is the farmland preservation allocation. The survey interviews also note the concern that funds dedicated to farmland preservation may only incidentally benefit the public, as those land holdings remain under private ownership and are not open for public access.

With the challenges of the climate crisis, continued habitat loss, and severe loss of biodiversity, the renewal of Measure A funds is an opportunity to reprioritize funding allocations.

2. Other Possibilities for Highest and Best Use of Public Funds

Taxpayer funding should allow for the highest benefit for all communities (human and natural communities) to create biodiversity corridors, improve connection to the natural world, and to provide appropriate land management strategies. We offer some examples that provide a shift in the funding opportunities that create multiple co-benefits and would also allow for public access.

2.A. Tribal Land Acquisition and Partnership

Over the last 300 years, the Coast Miwok people have been displaced from their ancestral lands where they resided for more than 10,000 years. In the last hundred years, development in the County of Marin has expanded rapidly causing additional destruction and desecration of cultural sites. Most recently, a development for multi-million-dollar homes in the city of Larkspur destroyed a significant cultural site that dated back more than 4,500 years and “contained 600 human burials, tools, musical instruments, harpoon tips, spears and throwing sticks...the bones of grizzly and black bears were also found, along with a ceremonial California condor burial.”⁴

⁴ San Francisco Gate, Indian Artifact Treasure Trove Paved Over for Marin County Homes, April 14, 2014. Available at: www.sfgate.com/bayarea/article/Indian-artifact-treasure-trove-paved-over-for-5422603.php

A program within Measure A could be crafted to identify potential locations, cultural sites, and other locations that are important to the Coast Miwok that could allow for land acquisition partnerships under a conservation easement that is in alignment with the mission and values of Marin County Parks and Open Space.

Rethinking the Measure A Sales Tax measure to create opportunities to create funding pathways for tribes, tribal nonprofits, and non-federally recognized tribes to purchase and manage land and important cultural sites in partnership with Marin County Parks and Open Space would be significant and a meaningful long-term step to correct the mistakes of the past.

2.B. Nature-Based Climate Change Mitigations and Ecological Restoration

In the face of the climate crisis, the County has adopted a Climate Action Plan and the state of California is investing resources to improve land and coastal management and adaptation strategies to decrease the amount of Greenhouse Gases (GHG) in the atmosphere.

To be consistent with both state and local efforts, Measure A funding should be updated to include potential nature-based mitigations to acquire and restore high priority lands and wetlands that are important to sequester GHG and provide important co-benefits like improved water quality, important biodiversity habitat value, public access, and riparian and urban creek and stream restoration. Regarding blue carbon, coastal wetlands are extremely important and sequester carbon at a rate up to 10 times greater than tropical forests.⁵

Measure A funds could include support for the County's existing related projects, some of which are mentioned in the County's Climate Action Plan⁶, as well as identification of additional high priority restoration areas, which may have multiple co-benefits. There may also be data available now or soon from the California Air Resources Board (CARB) or other entities regarding key blue carbon restoration sites, e.g. CARB Natural and Working Lands (NWL) Inventory re. wetland data. Additional County (or other local agency) related projects, which may have carbon sequestration benefits include the Bothin Marsh, McInnis Marsh, the Bolinas North End/Wye Wetlands, and the South End Living Shoreline Project Resiliency projects. Additional locations could be identified by reviewing existing data on restoration of bar-built estuaries, which function as carbon sinks, as well as other sources⁷.

The funding framework for Measure A should be updated to include the best available science to factor acquisition and restoration of land and wetlands that are important for sequestration of GHG and provide important nature-based solutions to some of the challenges of the climate crisis, including sea-level rise.

⁵ NOAA, Coastal Blue Carbon. Available at: <https://oceanservice.noaa.gov/ecosystems/coastal-blue-carbon/>

⁶ County of Marin, *Marin County Unincorporated Climate Action Plan 2033*, Appendix Drawdown Marin Solutions, A-6; Blue Carbon Wetlands Restoration. Accessed October 15, 2021. Available at: www.marincounty.org/-/media/files/departments/cd/planning/sustainability/climate-and-adaptation/draft-climate-action-plan-2030.pdf?la=en

⁷ Central Coast Wetlands Group, Using New Methodologies to Assess Bar-built Estuaries along California's Coastline, Final Report, Nov. 30, 2013. Available at: <https://mlml.sjsu.edu/ccwg/wp-content/uploads/sites/23/2020/01/FinalReport-BBECRAM.pdf>

The Climate Action Plan notes the importance of wetland restoration as important areas for sequestration referred to as blue carbon⁸.

Regarding the acquisition of additional land, the focus should be on urban parks, as well as areas which can sequester significant carbon and restore water quality including areas like Estero Americano and Estero San Antonio. Urban parks may have additional co-benefits including providing cooling and mental health benefits, as well as low cost recreation opportunities. The economic benefits of recreation on public lands are well-documented, as is the carbon sequestration potential.⁹

In addition, areas which may be needed for managed retreat or upland migration of wetlands, should be prioritized for land acquisition. Otherwise, our coastal wetlands may have nowhere to retreat to as sea levels rise.

3. The Biodiversity Crisis

We are in a global biodiversity crisis, and we have an important role in preserving biodiversity as California is the most biodiverse state in the nation.¹⁰ Many threatened and endangered species occur in Marin County, and the County is also part of the North American Flyway, a hotspot for avian species.¹¹

Marin County can play an important role in helping to preserve biodiversity by preserving and restoring sensitive habitat areas and providing education, as well as potentially becoming increasingly involved in the state¹² and federal¹³ 30x30 efforts.

The County could also devote funds to additional research around protecting native species and their habitats. This ties closely into the Measure A goal of protecting the natural beauty of Marin and the Measure A survey results received to protect the biodiversity of our lands (not to forget waters). Wildlife corridors could also be explored, to better connect existing wildlife pathways.

4. Expanding Equity and Tribal Programming

There is room for funding additional partnerships focused on being fully inclusive of local non-profits, tribal partners, and other stakeholders to provide outdoor education experiences for underserved communities. In the past, Measure A funding has provided a series of grants for these purposes in open requests for proposals. Setting aside additional funding for this purpose is important to ensure all of our

⁸ County of Marin, *Marin County Unincorporated Climate Action Plan 2033*, Appendix Drawdown Marin Solutions, A-6; Blue Carbon Wetlands Restoration. Accessed October 15, 2021. Available at: www.marincounty.org/-/media/files/departments/cd/planning/sustainability/climate-and-adaptation/draft-climate-action-plan-2030.pdf?la=en

⁹ Economic Contributions of Outdoor Recreation on Federal Lands (2016). Available at: https://www.doi.gov/sites/doi.gov/files/uploads/recn_econ_brochure_fy_2016_2018-04-04.pdf; Carbon Sequestration Potential of Federal Lands. Available at: <https://eros.usgs.gov/doi-remote-sensing-activities/2016/usgs/carbon-sequestration-potential-federal-lands>

¹⁰ California Fish and Wildlife Department, Biodiversity – The Variety of Life on Earth. Available at: <https://wildlife.ca.gov/Biodiversity>

¹¹ Point Reyes and the surrounding area has been named the National Audubon’s Society’s #1 birding hotspot for multiple years, where 54%+ of all North American bird species have been seen and recorded. Available at: www.npca.org/articles/1501-get-your-binoculars-the-25-best-national-parks-for-birding

¹² California Biodiversity Collaborative. Available at: <http://biodiversity.ca.gov>

¹³ U.S. Department of the Interior, America the Beautiful. Available at: www.doi.gov/priorities/america-the-beautiful

people in Marin have access to public lands, environmental education, and it also allows for partners to assist in the delivery of Marin County Parks and Open Space's mission.

Annually, EAC provides field trips for elementary and middle school youth to Roy's Redwoods and Agate Beach for natural history and environmental programming. In the past, we have received small grants to assist with the delivery of these programs. Over a period of three years, we provided opportunities to more than 300 students from primarily underserved schools in coastal Marin.

When we survey the students from schools in the eastern and northern portions of the County, we are always surprised that in many cases, even though the field trip is to areas only 20 minutes away from their school or residences, most, if not all, students have never visited the location and they are surprised to learn that the public parks are places they can visit any time with their families and friends for free.

In addition, there are opportunities for the County to learn from successful tribal partnerships throughout California where education, interpretation, research, and other programming prioritizes employment or partnerships with local tribal community members. Some of the successful programs along the North Coast of California serve as excellent examples of pathways to build bridges to begin to mend the trauma that colonization has had on tribal communities.

5. Public Access

Regarding public access, the Measure A survey also identified maintenance and improvements of both park facilities and preservation of roads and trails which could improve public access. Barriers to public access should be reviewed with potential additional funding for supporting access by youth and underserved populations, while also exploring any cost, transportation, or accessibility barriers.

Parks that are easily accessible from urban areas and offer access by public transportation should be prioritized, while exploring additional access pathways to park areas which are harder to access like free or low-cost transportation. Methods of low-GHG access are preferred and should be prioritized, e.g. biking, walking, or public transportation.

6. Public Land Acquisition to Reduce Fire Risk

Also identified in the Measure A survey, there is an especially strong interest in wildfire prevention on Park and Open Space lands. This could be expanded to include a review of land which should be preserved as a method of fire protection including lands adjacent to, or in, the wildland urban interface.

An additional concern, there are many properties in the County where zoning would allow development, but which should not be developed due to high fire risk. The riskiest of these properties, many of which have public value for recreation, wildlife and native plant restoration and viewsheds, should be preserved with any funds dedicated to land acquisition and conservation. This would respond to the high public interest in the survey about using Measure A funds for fire risk reduction.

Conclusion

In conclusion, this is an excellent opportunity to re-evaluate the allocation of public funds to support the mission and values of Marin County Parks and Open Space. This allows the County to consider and align programming to address the climate and biodiversity crises and to provide pathways for community and environmental co-benefits, so that future generations will be able to experience the wild

and natural environment and hopefully continue to find salmon in our creeks and monarchs migrating to the coast to overwinter.

Sincerely,

A handwritten signature in black ink, appearing to be 'MP' followed by a long horizontal flourish.

Morgan Patton
Executive Director

A handwritten signature in black ink, clearly legible as 'B. Mitchell'.

Bridger Mitchell
Board President

CC: Marin County Board of Supervisors, Supervisor Dennis Rodoni, Marin County Parks and Open Space Commission

List of Figures:



Figure 1: MALT Properties Map, as of October 15, 2021. Available at www.malt.org/where-we-work

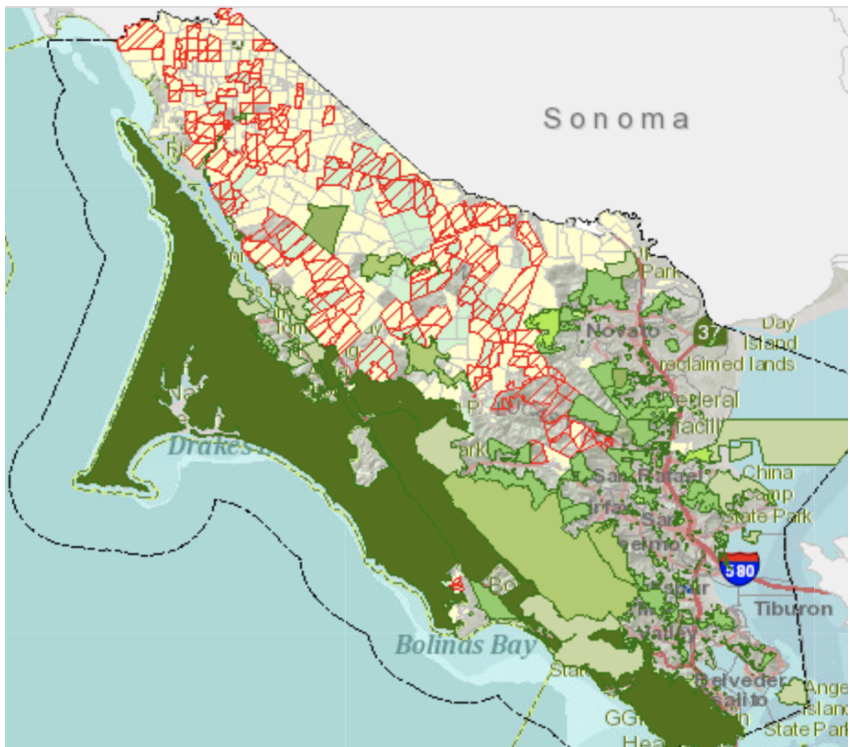


Figure 2: County of Marin, Marin Map GIS Viewer. Red outlines are MALT conservation easements. Shades of green include public lands (federal, state, and county). Light yellow parcels are agricultural that are not currently under “farmland preservation” but may be included in the Williamson Act and are part of A-60 zoning. Available to generate with specific layers at: www.marinmap.org