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REAL ESTATE  
LAND USE  
BUSINESS LAW  
ESTATE PLANNING

VIA HAND DELIVERY

November 13, 2012

Pascal Sisich, Chair, and Members of the Planning Commission  
San Anselmo Planning Commission  
Town of San Anselmo  
525 San Anselmo Avenue  
San Anselmo, CA 94960-2682

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NOV 13 2012

TOWN OF SAN ANSELMO  
PLANNING, BLDG. PUBLIC WORKS

Re: 711-715 Sir Francis Drake Boulevard, San Anselmo, CA  
Fence Variance

Dear Chair Sisich and Members of the Planning Commission:

Our firm represents Ford Greene, owner of the referenced property. This letter is submitted in support of the application for a variance as to the height of a fence located at the referenced property. The fence spans 29-feet between the Olive Office Building, address, and the Hansen Professional Building, address, along the southeastern boundary line of Greene's property. The height of the fence is 14 feet. Thus, it exceeds the code maximum of 8 feet by 6 feet as to which 6 feet this variance is sought.

The findings required in order to support the grant of a variance are set forth in Government Code section 69506, which states:

Variations from the terms of the zoning ordinances shall be granted only when, because of special circumstances applicable to the property, including size, shape, topography, location or surroundings, the strict application of the zoning ordinance deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification.

Any variance granted shall be subject to such conditions as will assure that the adjustment thereby authorized shall not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated.

A variance shall not be granted for a parcel of property which authorizes a use or activity which is not otherwise expressly authorized by the zone regulation governing the parcel of property. The provisions of this section shall not apply to conditional use permits.

There are special circumstances applicable to this property. The strict application of the zoning ordinance would result in depriving Greene and his tenants of the protection against noise, exhaust, prying eyes and risk of crime that other properties in the C-L District enjoy.

**1. Location: refer to drawing A7.0 and images 3, 12 and 38 on sheet A0.1**

- The subject property is the only property in the Town of San Anselmo that contains residential units, and which is exposed to Sir Francis Drake, Bridge Street and Center Boulevard. The property is right in the middle of one of the most traffic dense areas in Marin County. The subject property has more exposure to four different aggregate impacts from multiple sources than any other property in the Town.
- The 29-foot fence which spans the corner of the property is located is at a distance of:
  - a) 123 feet from the loading dock of Andronico's Supermarket;
  - b) 218 feet from the Golden Gate San Anselmo Hub Transit Bus stop at Center Boulevard;
  - c) 322 feet from Station 19 of the Ross Valley Fire Department;
- The two-lane Center Boulevard and Bridge Street and the four-lane Sir Francis Drake Boulevard are the busy traffic arteries that feed from Sonoma County, West Marin County, Fairfax and San Anselmo to Highways 101, 580 and beyond to the greater Bay Area.

For this unique location, granting of the variance does not present a special privilege to the property owner of 711-715 Sir Francis Drake Boulevard due to:

**2. Special Circumstances:**

- Sound Impacts
  - a) From cars: 35,000 cars per day from Sir Francis Drake to the north, according to a 2009 traffic study;
  - b) From public transportation buses: 177 times each day arrival and departure from the Hub Transit Center located on Center Boulevard. Monday through Friday- Routes 22, 23, 24, 27, 29 and 68;
  - c) From semi-truck routes, 24 hours daily delivering to Andronico's loading dock to the east, which loads from Bridge Street; and,

- d) From sirens and horns generated from fire engines and vehicles responding to emergency calls coming from Station 19 of the Ross Valley Fire Department to the South, and frequently accessing Sir Francis Drake Boulevard westbound by means of Bridge Street.
- Exhaust Pollution
  - a) From cars: 35,000 cars per day from Sir Francis Drake to the north according to a 2009 traffic study.
  - b) From public transportation buses: 177 times each day arrival and departure from the Hub Transit Center located on Center Boulevard. Monday through Friday- Routes 22, 23, 24, 27, 29 and 68;
  - c) From semi-truck routes, 24 hours daily delivering to Andronico's loading dock to the east which loads from Bridge Street; and
  - d) From Fire engines and vehicles responding to emergency calls coming from Station 19 of the Ross Valley Fire Department to the South and frequently accessing Sir Francis Drake Boulevard westbound by means of Bridge Street;

Thus, the existing fence height improves the health of the persons residing and working in the neighborhood as it blocks the extensive exhaust and noise from cars, buses, trucks and fire engines.

- Privacy invasion

Each day hundreds of people walk, sit high up in buses, drive or bike near Greene's property when going to and from the San Anselmo Hub Transit Center, Andronico's Supermarket, Downtown San Anselmo, Red Hill Shopping Center and the apartment buildings on Sir Francis Drake Boulevard westward of Greene's Building. Such persons:

- a) Look directly into the back yard of the subject property,
- b) Survey the activity there,
- c) Observe whether bicycles and other valuables are exposed and unlocked,
- d) Observe whether activity is occurring and, if so, what it is.

- Security issues – Residential

Hundreds of people, who walk, sit high up in buses, drive or bike near the area can:

- a) Survey residential areas of the property,
- b) Access into the back yard of the property,

- Security issues – Professional

An ordinary 8' fence would allow both the hundreds of people who frequent the San Anselmo Hub Transit Center to:

- a) Survey professional areas and property,
- b) Access into the back yard of the subject,
- c) Penetrate the residential areas. The Owner's law practice is nationally known for taking on and beating powerful religious cult groups. A consequence of his success has been the targeting of his home and office for surveillance at all hours of the day and night, burglarizing and other forms of harassment.

The existing fence height protects the barn from the street and is critical for the safety of the occupants of 711-715 Sir Francis Drake.

The surrounding neighbors do not object to the existing fence's height as demonstrated by their signature shown on drawing sheet A7.0 and more completely in the letters submitted herewith.

In addition the existing fence height contributes to the aesthetics of the neighborhood. The fence is practically not visible from the street as it is screened by existing trees and is of shorter height than the two buildings on either side of it. Please refer to images 3, 12 and 38 on sheet A0.1

Due to the special circumstances applicable to this property, location, surroundings, noise, exhaust pollution and safety the strict application of the regulations deprive the property of privileges enjoyed by other properties in San Anselmo. i.e., freedom of noise and exhaust produced within very close proximity, and privacy and security. The granting of the variance will not constitute a grant of special privileges.

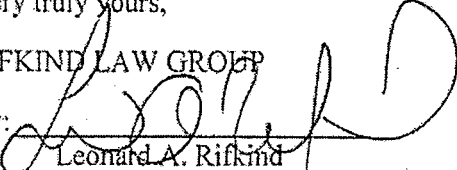
The granting of the variance does not affect adversely the health or safety of persons residing or working in the neighborhood as evident by the neighbors' property owners' support.

Thank you for your consideration.

Very truly yours,

RIFKIND LAW GROUP

By:

  
Leonard A. Rifkind

LAR/fw

Encl.

LAW OFFICES

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TOWN OF SAN ANSELMO  
PLANNING, BLDG. PUBLIC WORKS

Re: 711-715 Sir Francis Drake Boulevard, San Anselmo, CA  
Existing Residential Use of First Floor Apartment, 711 Sir Francis Drake  
Conditional Use Permit Application

Dear Chair Sisich and Members of the Planning Commission:

Our firm represents Ford Greene regarding his property at the referenced address. The two matters before you pertain to the owner occupancy of a turn of the 20<sup>th</sup> century 3-story structure that Giuseppe Cordone built in 1905 when what is now Sir Francis Drake Boulevard was called Olema Road and made of dirt.<sup>1/</sup>

The Cordone Family's ownership of the building ended in 2001 when the current owner, local attorney and two-term town council member, Ford Greene, having lived and worked in the building since 1986, purchased it. Thus, the premises have escaped municipal and public review until the present hearing, which is thus its debut.

In 2001, the Town's building department conducted a mandatory Pre-Sale Inspection, which generated a report not served on Greene until 2005. The report characterized Greene's residence on the first floor in the old bakery as an "illegal second unit."<sup>2/</sup>

<sup>1/</sup> The intent of this letter is to summarize and crystallize two matters, Greene's appeal of the August 14, 2012 administrative determination that the use of the first floor area of 711 Sir Francis Drake Boulevard for residential purposes is not a legal conforming use, and his application for a conditional use permit. It is meant to augment, but not replace, the issues he raises in his August 24, 2012 appeal of the August 14, 2012 administrative determination. Thus, all issues raised in such appeal are reserved.

<sup>2/</sup> As an effective aid to the comprehension of three complex tracks of development over the course of over the past 100 years, in conjunction with this letter Greene has submitted a

Based on the Town's characterization of the premises at issue as a "second unit," the plans Greene has submitted in support of his Conditional Use Permit application have employed that designation.<sup>3/</sup>

Such designation, however, is erroneous and objectively incorrect. Since 1976 when San Anselmo enacted Ordinance 706 (its Second Unit Ordinance), the very definition of a "second unit" has been limited to a use in a single family residential district. Because Greene's building has been located initially in an unrestricted district, and then a commercial district, to designate any occupancy as a second unit, whether authorized or unauthorized, is an incorrect application of the second unit ordinance, which simply does not apply to 711-715 Sir Francis Drake.

Eleven years later in 2012, in the context of researching and applying a so-called "grandfathering analysis," Planning Director Henderson repeated the same error when she interpreted Greene's claim to first-floor residential occupancy as referencing a "second unit."

Had Henderson independently examined the uses authorized in the C-L District, taken a look at the history of zoning regulation in that Zoning District, and evaluated the history of occupancy in Greene's building without apparent pressure from the Town Council, she would have seen that there is no substantial issue as to Greene's continuing residential use of the first floor of 711 Sir Francis Drake, which has always been a legal use in the building.

From before the incorporation of San Anselmo in 1907, and from before the advent of its building regulations in 1911, mixed use and live / work occupancies are the ways in which Greene's building has been used for over 100 years, from the beginning to the present.

With two classically residential units on the topmost third floor (although still available for live / work arrangements), and two live / work units on the street level second floor, since at least 1909 first floor bakery has been part of the 711 unit and used for live / work purposes.<sup>4/</sup>

From 1911 through early 1991, San Anselmo Ordinances Nos. 90, 190, 254, 338, 399, and 485 defined "apartment house," "apartment," "dwelling multiple," "dwelling multiple family" as a

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graph entitled "Chronology of Occupancy and Zoning Development for 711-715 Sir Francis Drake Boulevard." The first row tracks the mixed use, live / work occupancies in the building from 1911 to the present. The second row tracks the relevant developments of San Anselmo's building and zoning regulations, and the third row tracks the development of non-conforming law over the same time period.

<sup>3/</sup> The Uniform Building Code section 104 empowers the building official to make interpretations of the code and related matters. Greene's architect has advised him the professional protocol required adherence to the Town's designation notwithstanding its incorrectness.

<sup>4/</sup> Over the years, there was an internal staircase between the first and second floors of the San Anselmo Bakery. While those stairs no longer exist, the trap door on the second floor, which provided access to said stairs, does. Because a large file cabinet had been placed over the top of the trap door for the past 25 years or so, Greene had forgotten about its existence. The trapdoor is depicted on the architect's most recent plans.

building which housed three or more independent units with cooking facilities for three or more families.

In 1991 when Ordinance 917 exhaustively reworked San Anselmo's zoning scheme, it defined "residential multi-family" as "a building having four or more independent and attached residential units." It also defined "residential second unit" as "an additional living unit on a lot within an R-1 District," which as stated above simply does not apply here. In addition, this ordinance established the Commercial Limited (C-L) District in which Greene's building, the 16-unit apartment building across the street at 760 Sir Francis Drake, and all other existing residential uses became legally non-conforming uses in the new district.<sup>2/</sup>

Based on the consistent development of San Anselmo's zoning regulations over the last 100 years, Greene's residence properly falls within the scope of "residential multi-family" rather than being labeled a "residential second unit" as the Town has erroneously characterized his residence for the past 11 years.

The legal consequence of the proper characterization of Greene's residential use is as profound as it is simple.

If Greene's residence is properly characterized as an apartment, dwelling multiple, dwelling multiple family or multi-family residential, with the exception of the five years between 1991 and 1996 when the C-L District prohibited residential uses, such use has always been authorized by the applicable zoning scheme.

If Greene's residential unit is characterized as an "illegal second unit," it is prohibited in the C-L District. Apparently, according to Director Henderson's reasoning, Ordinance 706 would direct the analysis of Greene's occupancy in a commercial district, despite the fact the scope of 706 by its own terms is limited to "a duplex or multi-family use within a single-family residential district." Thus, pursuant to such a strained analysis, Greene's occupancy would be nonconforming, and subject to the rules aimed at phasing out nonconforming uses. In light of the history of occupancy at Greene's building, the history of the development of building regulations in San Anselmo, and the values identified in the Housing Element of San Anselmo's General Plan, the reasonable characterization of Greene's occupancy should be multi-family residential.

As described on page 8 of the Housing Element adopted in 2004 under the heading "Relationship of the Housing Element to the Entire San Anselmo General Plan, . . . The San Anselmo General Plan serves as the "Constitution" for development in the Town. It is a long-range planning and

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<sup>2/</sup> In 1996 San Anselmo cured this error with Ordinance 974, which enacted revisions to §10-3.201 (j) as to the C-L Limited Commercial District. The language 974 added was "Residential uses are allowed within the District, which provide mixed uses, live/work arrangements, and affordable housing that will not result in significant traffic disruption along Sir Francis Drake Boulevard. Offices and residential uses are encouraged . . . Multi-family uses are encouraged to provide incentives for mass transportation use." Commensurate revisions were made to Table 3A so as to allow for residential multi-family use while prohibiting residential second units.

building document that describes goals, policies and programs to guide decision-making. Once the General Plan is adopted, all development-related decisions in the Town must be consistent with the Plan. If a development proposal is not consistent with the Plan, it must be revised or the Plan itself must be amended. State law requires a community's General Plan to be internally consistent. This means that the Housing Element, although subject to special requirements and a different schedule of updates, must function as an integral part of the overall General Plan, with consistency between it and the other General Plan elements."

The 2004 Housing Element was adopted as being consistent with the General Plan. The themes of the Land Use Goals of the San Anselmo General Plan at p. 4 are to (1) retain San Anselmo's small-town character, scale and pace of life; (2) maintain the economic viability of the Town's commercial core; (3) preserve open space, hillsides and ridge areas; (4) preserve and enhance neighborhood character; and (5) accommodate the housing needs of a socially and economically diverse population.

Greene's occupancy both complies with and furthers the objectives set forth in San Anselmo's General Plan. Unlike most of the "older commercial structures along Sir Francis Drake Boulevard west of the Hub [that] present a potential traffic circulation and congestion problems because most of these structures were constructed without off-street parking," (General Plan at p. 21), Greene's building has adequate on-site parking.

Greene's maintenance of the building contributes to the General Plan goal of maintaining San Anselmo's small town character by the "creative conservation of older buildings" (*Ibid*) inasmuch as Greene has maintained the structural integrity of the building, detailed painting of the building, developed substantial habitat by means of the introduction and propagation of scores of both native and Mediterranean plants, where previously the lot was comprised of gravel only.

Moreover, Greene has preserved the permeable surface of most of the property, which is close to San Anselmo Creek, and irrigates the habitat by means of rain catchment collected in 5000 gallon water tanks. (General Plan, Conservation Element at p. 71, § (A)(2-4, 6) and at p. 72, § (B)(1-7, 12, 15-16).

Despite not having been required to do so, Greene replaced the roof of the building in the Fall 2011 with the more expensive and sustainable "cool roof" roofing material.

Greene's occupancy, indeed, all of the occupancies in his building, fit squarely within the requisites of C-L zoning as required by San Anselmo's General Plan. The occupancies are mixed uses including offices, live / work arrangements, and affordable housing that do not significantly impact traffic on Sir Francis Drake. It is a multi-family use building less than ¼ mile from San Anselmo Transit Center that facilitates transit-oriented, mixed use development.

Greene's owner-occupied, live / work occupancies conform to the General Plan's recognition that professional offices in San Anselmo can be both "occupied by professionals serving the community" and also by "local professionals who desire office space close to home." (General Plan at p. 3) Thus, he is in compliance with the General Plan's Land Use Goals by preserving



the small town character of San Anselmo, by maintaining the economic viability of the Town's commercial core, and by accommodating the housing needs of a socially and economically diverse population. (General Plan at p. 4; 2004 Housing Element at p. 8). Moreover "mixed residential and commercial use is appropriate along major traffic arterials and adjacent to commercial and office areas." (General Plan at p. 6, § 3.4).

A building that existed prior to the incorporation of San Anselmo is of "local historic value . . . and significance" (General Plan at p. 7, § 6.1) which should be preserved. (General Plan at p. 71, § (A)(6) and (B)(5)).

Greene is subject to the General Plan's Land Use principles that current land use in San Anselmo shall be the basis for determining the distribution of future land use in the community, and "in situations where the current zoning of land is inconsistent with the existing land use of the greater surrounding area, and development has already occurred, said existing development will be grandfathered into the predominant land use planned for the area." (General Plan at p. 4, ¶ 2)

Greene's occupancy complies with the housing policies and implementing programs set forth in the Housing Element of San Anselmo's General Plan. In general, the Housing Element requires the Town to "conserve and improve the existing affordable housing stock" and "address and remove governmental constraints." (2004 Housing Element at p. 3) Pertinent policies and implementing programs are as follows:

- H1.3: Preserves the stock of existing residential units;
- H1.5: Protects existing affordable housing;
- H1.6: As Greene is an owner-occupier he implements good management practices, long term maintenance and improvement of the multi-family units in his building;
- H2.1: Provides housing for local workers;
- H2.2: Contributes to the variety of housing choices in San Anselmo;
- H2.3: Provides mixed use housing. In particular, provides mixed use housing near the downtown area;
- H2.B: Facilitates transit-oriented, mixed use development;
- H2.C: The Town will review and amend its multi-family residential standards and procedures in order to assure protection of multi-family and mixed use sites consistent with the General Plan;
- H2.3: For over 100 years the building has been providing a multi-family and mixed use housing site that is consistent with San Anselmo's General Plan, provides affordable and work force housing, and thus merits protection; and,

- H3.1: Given that Greene will become 65 years old on December 21, 2017, he will attain the status of a special needs senior population subject to the development and rehabilitation of housing, in addition to being a single person with no children.

(2004 Housing Element at pp. 51-59.)

Assuming for the sake of argument, that the Town's designation of Greene's residence as a second unit is correct, there are a number of additional policies set forth in the General Plan and Housing Element that would apply and which he would satisfy.

The General Plan states "The Town has adopted a second unit ordinance designed to regulate the number of second units in any given neighborhood in the community." (General Plan at p. 2) Thus, for the Town to deny the authorization of second units in the C-L District is in conflict with its General Plan.

The applicable policies and implementing programs regarding second units that apply to Greene's occupancy are as follows:

- H2.13: The Town shall encourage the legalization of existing second units where they will not aggravate or create neighborhood problems;
- H2.14: . . .(g) require owner occupancy of the second or primary unit;
- H2.A: Provide employee housing opportunities;
- H2.B: Allow for more flexible parking requirements to facilitate transit-oriented and mixed use development; and
- H2.G: Continue to allow second dwelling units, and review and modify second unit development requirements in compliance with State law (AB 1866);

(2004 Housing Element 55-57)

- Policy Issue 3.1: The purpose of the Town's second unit requirements is to continue to encourage smaller, affordable secondary rental dwellings on single-family lots in appropriate locations in order to provide housing for elderly households, single persons and to help support some of the costs of maintaining the primary residence. Thus, one of the units must be owner occupied. (2004 Housing Element at p. A-6)
- Benefits of Second Units
  - Provide flexibility for the owner of the main home (they can be used as a home office, an apartment for elderly parents, or a source of income);

- When rented they help make home-ownership affordable for the owner of the home;
- They can provide flexibility for seniors or other homeowners who rent their primary dwelling because they still want to live in the same neighborhood;
- They provide lower cost housing; and
- They are easier to fit into existing neighborhoods since they are small and are often part of the main house. (2004 Housing Element at p. B-1.)

Finally, the Town's 2004 evaluation of the 1995 Housing Element estimated that there are over 200 alleged illegal second units in San Anselmo. (2004 Housing Element at p. B-3) There has been very little enforcement as to these units.

One must ask:

- Why did the Town in 2001 designate Greene's residence as an illegal second unit when in fact it was an apartment in a multi-family residence?
- Why has the Town continued to maintain such erroneous designation and instead of preserving housing stock, required Greene to spend over \$70,000 in architect and attorney's fees to resist public nuisance abatement proceedings, and submit an application for a conditional use permit?
- Why did the Town in derogation of its own written rules and without any public process enact a special procedure for Greene's application whereby the Planning Director would *solely* determine whether or not Greene was "grandfathered" as a "second unit" (rather than cue Greene in that his use was multi-family residential), and thus force Greene to pay for and prosecute an appeal, instead of allowing such determination to be made in the first instance by the Planning Commission?
- Is there any legitimate reason to exercise a municipal foreclosure and prevent a property owner from living on his own property where he has lived in excess of 20 years?

While the answer to these questions may be more political than practical, the adverse and ultimate result is the same: driving Greene from where he has lived for over 26 years and disrupting the financial viability of operating the multi-family residence in which he both continues to live and work.

Obviously, the answer to the last question is "no."

In pursuing their apparent agenda with respect to Town Council Member Greene, Director Henderson and other members of the Town staff do not appear to have complied with Housing Element Objective 4.0, which, in pertinent part states:

**“H4.9 Organizational Effectiveness.** In recognition that there are limited resources available to the Town to achieve housing goals, the Town will seek ways to organize and allocate staffing resources effectively to implement the programs of the housing element.”

(2004 Housing Element at p. 62.)

It is quite disconcerting that the Town Staff has driven what appears to be a substantial waste of both its resources and the resources of Councilman Greene to pursue reduction of an apartment housing unit occupied by the building owner that meets so many of the Town’s Housing Element goals and policies set forth above.

In conclusion, the Planning Commission should find that both Greene’s use of the first floor of 711 Sir Francis Drake is a residential use that has existed since the building was constructed 107 years ago, and also that such use is legally conforming within the C-L District.

With respect to Greene’s application for a conditional use permit, pursuant to § 10-1305 the Planning Commission must make the following required findings:

“(a) The establishment, maintenance, or operation of the use will not, under the circumstances of the particular case, be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of the proposed use, or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the Town.”

“(c) Limited Commercial (C-L) District – All Uses Requiring a Use Permit: The granting of the use permit will not allow a use which generates traffic at a rate greater than:

(1) Fifty (50) vehicle trip ends for each 1,000 gross square feet of gross leasable building area, or

(2) The existing number of trips during the a.m. and p.m. peak hours generated by the existing use as of July 22, 1997 (the determination for vacant buildings will be the most recent use between February 26, 1991 and July 22, 1997) on Sir Francis Drake Boulevard. Those numbers of traffic trips typically generated for existing and proposed uses shall be obtained from the current edition of Trip Generation, Institute of Transportation Engineers.”

That the existing residential use presents no detriment to the Town is underscored by the in-excess-of-100-year history of mixed use occupancy of the premises in general and Greene’s in-excess-of-20-year history occupying his current residence. No detriments of any sort have been reported.

The traffic impact for the entire building is minimal, perhaps a maximum of 20 trips per day, much less than 250 car trips per day. There are four human occupiers of the premises. If each person takes three automobile trips and has two business contacts per day, the total traffic impact trips is 20.

Chair Sisich and Members of the Planning Commission

November 13, 2012

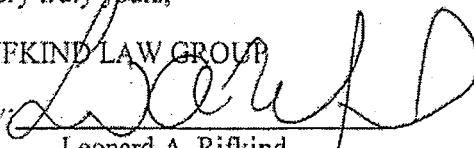
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Thank you for your time, attention and consideration of this very important matter.

Very truly yours,

RIFKIND LAW GROUP

By:

  
Leonard A. Rifkind

LAR/fw

# CHRONOLOGY OF OCCUPANCY AND ZONING DEVELOPMENT

