- Bicycle Infrastructure: safe, easy access, free, bike sharing for Canal-to-downtown mobility,
- Restrooms: clean and well stocked secure.
- Affordability: concerned for raising fare rates.
- Reliability: accountability and reporting on delays
- Capacity: concern for a full a bus passing-up a passenger trying to get to work or health appointments.

We welcome an opportunity to have more time for us to build capacity and implement a short process that would allow more community members provide direct input. Relative to other stakeholder groups, our communities require greater support to feel confident in offering informed feedback, considering all the project's factors, inputs, benefits, liabilities, and the short and long-term impacts on the community, the city, and the region. Many other key stakeholder groups already benefit from that knowledge and have organized advocacy infrastructure and expertise to effectively communicate their opinions.

14-3

14-4

We feel it is important for the whole process to be grounded in and guided by the reality that the majority of riders are Latinos and low-income essential workers whose contributions are necessary to holding up our economy and leading our recovery. An equitable approach would recognize that they are people who rely on transit, and that such access is an essential element to accessing employment and making a living. Such an approach would also allow for great opportunities and investment in incorporating community participation more strategically and would be responsive to the context and the barriers to engagement faced by this group.

In addition to the priorities listed above, we want to note that there are significant drawbacks and dangers to some of the alternatives, which we can share with you in more detail. However, the highest concerns are that a transit center that is separated into different stations increases danger for pedestrians, complicates transfers, and can be confusing to riders. The downtown traffic is already heavy, confusing, and dangerous; adding hurried riders racing to catch a bus will only make conditions worse. A single-site option works best for all riders, and as noted above, crosswalk safety measures are a priority for any alternative.

While we need a transit center that meets the public transportation needs of today and the near-future, we also need a transit center that strategically and inclusively anticipates, plans for, and accounts for the kind of growth we are working toward in the city and the region.

The future of mobility is sustainable, equitable, affordable public transit alongside infrastructure that invites and inspires non-car means including walkable streets and a working-people's biking network. We look forward to partnering with you to develop plans that include a vision for transit for future generations in our communities.

Sincerely

Omar Carrera

Chief Executive Officer

Canal Alliance

Marina Palma

Darlin Ruiz

Community Leaders
Voces del Canal

# 9.2.14.1 Response to Comment Letter 14, Canal Alliance and Voces del Canal, Omar Carrera

#### Comment 14-1

On behalf of Canal Alliance and Voces del Canal, a Canal resident leadership group, we write to express our support for the San Rafael Transportation Center and for the many ways this project represents an opportunity not only for our city and our region, but especially for the low-income and Latino transit riders who make up the majority of the ridership. We also want to strongly recommend that there can be an opportunity for greater equity in the design, analysis, and implementation of the project.

We are aligned on what we believe are common goals across stakeholders and decision-makers. We also agree on the need for a transit center that not only meets current and near-future public transportation needs, but also anticipates the kind of growth we are working toward in the city and the region. In particular, to serve the long-term needs of our communities ensure that the environmentally-friendly public transportation system offers the best, easiest, most affordable, and reliable option for mobility, a transit center needs to plan for a rise in demand that will result from increased housing, both affordable and low-income housing options.

#### Response to Comment 14-1

The comment expresses support for the project and emphasizes the importance of engaging the local community, particularly low-income and Latino transit users, in the project process. The comment also expresses that transit will become increasingly important as San Rafael grows due to housing expansion. One of the project objectives is to "design a functional, attractive, and cost-effective facility that can meet long-term projected service levels and be implemented in an expeditious manner, so as to minimize the period of use of the interim facility."

Chapter 1, Section 1.3.1, Agency and Public Outreach, of the EIR discusses past and planned community engagement on the proposed project (see page 1-3 of the Final EIR). The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 14-2

Recently, Canal Alliance had the opportunity to host a presentation of the various alternatives by the GGBHTD's staff for the leadership team of Voces del Canal. It was a great opportunity to learn more about the project and the details of the proposed alternatives. However, it also provided an overwhelming amount of information for our participants to process, let alone provide immediate feedback on.

As we look at your materials and timeline, we see that there is still some time for us to partner and develop a process that provides capacity-building for our community leaders to understand the project and to then provide more informed and helpful recommendations and a set of priorities that we believe should guide the development of the transit center. In the meantime, we wanted to share with you some initial thoughts and reflections based on many years of working with our community and our community leaders on what we know are critical priorities from prior community development and transportation issues discussions. Below is a preliminary list based on what we know about our community and from discussions we have had about the future of transit in the Canal neighborhood and surrounding areas:

Public Safety: street lighting, transit center lighting, multilingual signage, way-finding.

- Street Safety: traffic calming, wider crosswalks, safety lights at crosswalks.
- Wide Access: multi-generation family groups walking together (parent, stroller, children, grandparent).
- Bicycle Infrastructure: safe, easy access, free, bike sharing for Canal-to-downtown mobility,
- Restrooms: clean and well stocked secure.
- Affordability: concerned for raising fare rates.
- Reliability: accountability and reporting on delays
- Capacity: concern for a full a bus passing-up a passenger trying to get to work or health appointments.

#### **Response to Comment 14-2**

The comment concerns public safety and access at the new transit center. As outlined in Section 3.1, Aesthetics, the project would be required to comply with several outdoor lighting policies in *San Rafael General Plan 2040* (such as Policies CDP-4.11 and C-1.19) and the City's Municipal Code. Section 3.10, Land Use and Planning, also outlines how the project would comply with applicable lighting policies. While wayfinding signage is part of the project design (page 2-11 of the Final EIR), the EIR does not specify if it is multilingual.

Pedestrian safety barriers are included in the project design at areas where there would be pedestrian-vehicle interaction, such as along the bus pick-up zones (Figures 2-4 through 2-7). Street safety measures for various modes of transportation (pedestrian, bicycles, and vehicular) are addressed in Section 3.14, Transportation.

The project would also be required to comply with applicable federal, state, and local policies pertaining to pedestrian and bicycle safety. Table 3.14-4 outlines the consistencies and few inconsistencies of each build alternative to transportation goals and policies. The project's objectives include "[p]rovid[ing] transit facility that is readily accessible to individuals with disabilities, transit users, and transit-dependent populations, including those with low incomes" (page 2-5 of the Final EIR). This includes compliance with the Americans with Disabilities Act of 1990, which establishes minimum standards for ensuring accessibility in public spaces for all users (page 3.14-1 of the Final EIR).

The project would not change bus service frequency or vehicle size that would affect bus passenger capacity and throughput. The project would increase transit operations flexibility at the transit center that may allow for improved transit service, at the discretion of the transit operators; however, transit service changes are not included as part of the project.

Other project components mentioned in the comment, such as fare rates and restroom maintenance, do not pertain to CEQA resources and are therefore not addressed in the EIR. No revisions to the Draft EIR are necessary as a result of this comment.

#### Comment 14-3

We welcome an opportunity to have more time for us to build capacity and implement a short process that would allow more community members provide direct input. Relative to other stakeholder groups, our communities require greater support to feel confident in offering informed feedback, considering

all the project's factors, inputs, benefits, liabilities, and the short and long-term impacts on the community, the city, and the region. Many other key stakeholder groups already benefit from that knowledge and have organized advocacy infrastructure and expertise to effectively communicate their opinions.

We feel it is important for the whole process to be grounded in and guided by the reality that the majority of riders are Latinos and low-income essential workers whose contributions are necessary to holding up our economy and leading our recovery. An equitable approach would recognize that they are people who rely on transit, and that such access is an essential element to accessing employment and making a living. Such an approach would also allow for great opportunities and investment in incorporating community participation more strategically and would be responsive to the context and the barriers to engagement faced by this group.

#### **Response to Comment 14-3**

The District's public outreach efforts are detailed in Chapter 1, Section 1.3.1, Agency and Public Outreach. Since 2017, the District has held various workshops with community representatives including Canal Alliance and bilingual activities. The District has endeavored to perform adequate outreach to address public concerns throughout the initial project design phase. Initial design concepts were evaluated based on feedback received from public outreach to the local communities, which was summarized in Draft EIR Chapter 5, Alternatives (page 5-1 of the Final EIR). The District will continue to perform public outreach and engagement continuing into the design and construction phases of the project.

#### Comment 14-4

In addition to the priorities listed above, we want to note that there are significant drawbacks and dangers to some of the alternatives, which we can share with you in more detail. However, the highest concerns are that a transit center that is separated into different stations increases danger for pedestrians, complicates transfers, and can be confusing to riders. The downtown traffic is already heavy, confusing, and dangerous; adding hurried riders racing to catch a bus will only make conditions worse. A single-site option works best for all riders, and as noted above, crosswalk safety measures are a priority for any alternative.

While we need a transit center that meets the public transportation needs of today and the near-future, we also need a transit center that strategically and inclusively anticipates, plans for, and accounts for the kind of growth we are working toward in the city and the region.

#### **Response to Comment 14-4**

The comment expresses concern with the 4th Street Gateway and Under the Freeway Alternatives' design due to the separation between the SMART station and the bus bays. The commenter's concern for pedestrian safety at the split station design at the 4th Street Gateway and Under the Freeway Alternatives is acknowledged. The District has performed additional pedestrian safety analysis, and findings have been included in the Final EIR. The analysis found that the Move Whistlestop Alternative, which has been identified by the District as the preferred alternative, would provide the greatest benefit to pedestrian and bicycle safety for multiple reasons, including having transfers between transit services occur on the same block, as the commenter noted. Please see the response to comment 5-58 for additional information on this analysis. This is not a comment on the adequacy of the EIR and no revisions to the Draft EIR are required.



Raymond Santiago Principal Planner Golden Gate Bridge, Highway and Transportation District

Re: San Rafael Transit Center DEIR Comments

November 3, 2021, via Electronic Mail

Dear Raymond,

15-2

On behalf of Canal Alliance, I write to again express our strongest support for the San Rafael Transit Center and for the many ways this project represents an opportunity not only for our city and our region, but especially for the low-income and Latino transit riders who make up the majority of the ridership.

We remain aligned on what we believe are common goals across stakeholders and decision-makers. We also agree on the need for a Transit Center that not only meets current and near-future public transportation needs, but also anticipates the kind of growth we are working toward in the city and the region. To serve the long-term needs of our communities and ensure that the public transportation system offers the best, easiest, most affordable, and reliable option for mobility, the Transit Center needs to plan for the rise in demand that will result from increased housing, both affordable and low-income housing.

Further, we appreciate that the District has identified the 'Move Whistlestop Alternative' as its preferred alternative. Canal Alliance supports this decision, as this alternative responds to concerns shared by Canal residents during community meetings related to mobility, safety, and efficiency.

The history of community development, city planning, and transportation planning is full of examples of what typically happens in these kinds of project development processes: affluent constituents and resident groups who have access to means and resources are more successful in shaping and influencing the decision-making process while under-resourced communities are marginalized and their participation tokenized, at best.

In contrast to these historic tendencies, the San Rafael Transit Center project offered an opportunity to Canal community leaders and residents to understand the project and provide direct, informed input. We feel it is important for the whole process to be grounded in and guided by the reality that the majority of riders are Latinos and low-income essential workers whose contributions are necessary to holding up our economy and leading our recovery. This more equitable approach would recognize that they are people who rely on transit, and that such access is an essential element to accessing employment and making a living. Such an approach would also be responsive to the context and the barriers to engagement faced by this group and would demonstrate an intentional investment in more inclusive practices by incorporating community participation more strategically and democratically.

91 Larkspur Street San Rafael, CA 94901 415.454.2640 15-4 cont. We want to be completely clear in our message here: Canal residents will be the main users of the San Rafael Transit Center and we are reaching out to you, to represent their priorities, concerns, and opportunities in a way that is commensurate with the population as well as with their contribution to the economic success and ongoing recovery of the region. To continue to leave Canal residents out of the deliberations and decision-making is to again undermine the will of this community and the many gains we have made in trying to integrate the community and build trust across the city and county.

Sincerely.

Omar Carrera

Chief Executive Officer

# 9.2.15.1 Response to Comment Letter 15, Canal Alliance and Voces del Canal, Omar Carrera

#### Comment 15-1

On behalf of Canal Alliance, I write to again express our strongest support for the San Rafael Transit Center and for the many ways this project represents an opportunity not only for our city and our region, but especially for the low-income and Latino transit riders who make up the majority of the ridership.

#### Response to Comment 15-1

The comment expresses support for the proposed project. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 15-2

We remain aligned on what we believe are common goals across stakeholders and decision-makers. We also agree on the need for a Transit Center that not only meets current and near-future public transportation needs, but also anticipates the kind of growth we are working toward in the city and the region. To serve the long-term needs of our communities and ensure that the public transportation system offers the best, easiest, most affordable, and reliable option for mobility, the Transit Center needs to plan for the rise in demand that will result from increased housing, both affordable and lowincome housing.

#### Response to Comment 15-2

The comment expresses the importance of a transit center that accommodates projected growth in San Rafael. To address future ridership, one of the proposed project's objectives (see Chapter 2, Section 2.3, Project Objectives) is to: "[d]esign a functional, attractive, and cost-effective facility that can meet long-term projected service levels and be implemented in an expeditious manner, so as to minimize the period of use of the interim facility." Projected future demand for public transit has been considered throughout project design. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 15-3

Further, we appreciate that the District has identified the 'Move Whistlestop Alternative' as its preferred alternative. Canal Alliance supports this decision, as this alternative responds to concerns shared by Canal residents during community meetings related to mobility, safety, and efficiency.

#### **Response to Comment 15-3**

The comment expresses support for the Move Whistlestop Alternative (the preferred alternative). The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 15-4

The history of community development, city planning, and transportation planning is full of examples of what typically happens in these kinds of project development processes: affluent constituents and

resident groups who have access to means and resources are more successful in shaping and influencing the decision-making process while under-resourced communities are marginalized and their participation tokenized, at best.

In contrast to these historic tendencies, the San Rafael Transit Center project offered an opportunity to Canal community leaders and residents to understand the project and provide direct, informed input. We feel it is important for the whole process to be grounded in and guided by the reality that the majority of riders are Latinos and low-income essential workers whose contributions are necessary to holding up our economy and leading our recovery. This more equitable approach would recognize that they are people who rely on transit, and that such access is an essential element to accessing employment and making a living. Such an approach would also be responsive to the context and the barriers to engagement faced by this group and would demonstrate an intentional investment in more inclusive practices by incorporating community participation more strategically and democratically.

We want to be completely clear in our message here: Canal residents will be the main users of the San Rafael Transit Center and we are reaching out to you, to represent their priorities, concerns, and opportunities in a way that is commensurate with the population as well as with their contribution to the economic success and ongoing recovery of the region. To continue to leave Canal residents out of the deliberations and decision-making is to again undermine the will of this community and the many gains we have made in trying to integrate the community and build trust across the city and county.

#### **Response to Comment 15-4**

The District welcomes all public input on the proposed project and will continue to engage the community in project development following the conclusion of the environmental review process.

The District's public outreach efforts are detailed in Chapter 1, Section 1.3.1, Agency and Public Outreach. Since 2017, the District has held various workshops with community representatives, including Canal Alliance, and bilingual activities. The District has endeavored to perform adequate outreach to address public concerns throughout the initial project design phase. Initial design concepts were evaluated based on feedback received from public outreach to the local communities, which was summarized in Draft EIR Chapter 5, Alternatives (page 5-1 of the Final EIR). The District will continue to perform public outreach and engagement continuing into the design and construction phases of the project.

Outreach conducted for the publication of the Draft EIR included a public meeting co-hosted by the Canal Alliance and facilitated in Spanish, to ensure that Canal residents had the opportunity to engage in this critical step of the environmental review process. The meeting was streamed via Facebook Live and is available on the Canal Alliance Facebook page at the following link: <a href="https://www.facebook.com/CanalAlliance.SanRafael/videos/592122478463859/">https://www.facebook.com/CanalAlliance.SanRafael/videos/592122478463859/</a>.

**From:** Sprague Terplan <sprague.terplan@gmail.com> **Sent:** Wednesday, September 15, 2021 4:39 PM

**To:** SRTC <SRTC@goldengate.org>

**Subject:** Proposed New Transit Center Will Slow Service for Southbound Riders

To whom it may concern at the Golden Gate Bridge, Highway, and Transportation District,

As a regular Golden Gate Transit and Marin Transit rider, I am concerned that all of the proposed redesigns of the San Rafael Transit Center, with the exception of one, will worsen and slow bus travel for Golden Gate Transit and Marin Transit riders who are headed southbound. All of the proposals, with the exception of the 4th Street Gateway Alternative, eliminate bus stops directly fronting Hetherton Street and this will result in slower and less efficient service for many southbound riders.

The current transit center's platform A has southbound bus stops along Hetherton Street (for Golden Gate routes 30, 70, 101, and 27 and for several Marin Transit routes, including route 71). The current arrangement is very convenient for southbound riders, especially those on route 101 (an express, inter-county service that operates daily and provides the fastest connection between Novato and San Francisco) - but also for passengers on routes 70 and 71.

Too often, southbound 70 and 101 buses arrive late to the San Rafael Transit Center and they would be further slowed by having to turn off of Hetherton Street, having to yield for pedestrians in the crosswalk across 4th Street, and then enter the proposed new transit center. Upon departure, the southbound bus would then have to exit onto 3rd Street and continue on a circuitous route in order to finally return to Hetherton Street and Highway 101. Of course, even for those route 70, 71, and 101 buses that arrive on time to the new transit center, they will also have slower, more circuitous, and less efficient service in the vicinity of downtown San Rafael than the existing arrangement provides.

As a longtime Golden Gate Transit rider, since about 1980, who continues to regularly use both Golden Gate Transit and Marin Transit and regularly transfer at the San Rafael Transit Center, I recognize that this aspect of the proposed redesigns is a step backwards and will slow public transit service and inadvertently discourage and depress ridership.

I call on your agency to include stops on Hetherton Street in whichever proposed redesign you adopt

16-1 cont. and to do everything within your power to ensure that bus riders, particularly southbound through-riders on your 70 and 101 routes, are not slowed or delayed by transit center redesign and resulting bus route realignments. If this is not taken into consideration in the redesign, I strongly encourage your agency to work with the city of San Rafael to install transit signal priority at Transit Center adjacent intersections and/or transit signal queue jumps to help compensate for the otherwise unavoidable delays to service that will result from poor transit center redesign. If this latter option is pursued, such signals must be in operation upon the opening of the new transit center or ridership will suffer delays.

Thank you very much,

Sprague Terplan San Francisco

#### 9.2.16.1 Response to Comment Letter 16, Sprague Terplan

#### Comment 16-1

As a regular Golden Gate Transit and Marin Transit rider, I am concerned that all of the proposed redesigns of the San Rafael Transit Center, with the exception of one, will worsen and slow bus travel for Golden Gate Transit and Marin Transit riders who are headed southbound. All of the proposals, with the exception of the 4th Street Gateway Alternative, eliminate bus stops directly fronting Hetherton Street and this will result in slower and less efficient service for many southbound riders.

The current transit center's platform A has southbound bus stops along Hetherton Street (for Golden Gate routes 30, 70, 101, and 27 and for several Marin Transit routes, including route 71). The current arrangement is very convenient for southbound riders, especially those on route 101 (an express, intercounty service that operates daily and provides the fastest connection between Novato and San Francisco) - but also for passengers on routes 70 and 71.

Too often, southbound 70 and 101 buses arrive late to the San Rafael Transit Center and they would be further slowed by having to turn off of Hetherton Street, having to yield for pedestrians in the crosswalk across 4th Street, and then enter the proposed new transit center. Upon departure, the southbound bus would then have to exit onto 3rd Street and continue on a circuitous route in order to finally return to Hetherton Street and Highway 101. Of course, even for those route 70, 71, and 101 buses that arrive on time to the new transit center, they will also have slower, more circuitous, and less efficient service in the vicinity of downtown San Rafael than the existing arrangement provides.

As a longtime Golden Gate Transit rider, since about 1980, who continues to regularly use both Golden Gate Transit and Marin Transit and regularly transfer at the San Rafael Transit Center, I recognize that this aspect of the proposed redesigns is a step backwards and will slow public transit service and inadvertently discourage and depress ridership.

I call on your agency to include stops on Hetherton Street in whichever proposed redesign you adopt and to do everything within your power to ensure that bus riders, particularly southbound through-riders on your 70 and 101 routes, are not slowed or delayed by transit center redesign and resulting bus route realignments. If this is not taken into consideration in the redesign, I strongly encourage your agency to work with the city of San Rafael to install transit signal priority at Transit Center adjacent intersections and/or transit signal queue jumps to help compensate for the otherwise unavoidable delays to service that will result from poor transit center redesign. If this latter option is pursued, such signals must be in operation upon the opening of the new transit center or ridership will suffer delays.

#### Response to Comment 16-1

The comment expresses concerns about delays in bus service resulting from the new layout of the preferred alternative (Move Whistlestop Alternative) and other build alternatives. The *Transportation Summary Report*, included in the Final EIR as Appendix E (Appendix C of the Draft EIR), evaluated bus circulation and the change in transit service delay for the No-Project Alternative and the build alternatives. For the future, Year 2040 conditions, the Under the Freeway Alternative and the two Whistlestop Alternatives would provide a reduction in transit travel time in both the a.m. and p.m. peak hours relative to the No-Build condition. The 4th Street Gateway Alternative would provide a benefit in the p.m. peak hour, but would result in a large increase in transit travel time in the a.m. peak hour, associated with increased congestion on several transit corridors. Please refer to Section 3.6, Transit Service – Bus Circulation Analysis Summary, in the *Transportation* 

Summary Report for more information on the analysis results. Bus stops along Hetherton Street are not feasible in the two Whistlestop Alternatives due to conflicts with the southbound right-turn lane to 3rd Street. However, by relocating the transit center north of 3rd Street, the amount of bus circulation through congested City streets would be reduced and by placing several bus bays west of the SMART tracks, a number of buses would no longer have to cross the tracks. These factors combine to result in faster and more reliable bus service with those alternatives.

----Original Message-----

From: Annette Holloway <acholloway@comcast.net> Sent: Wednesday, September 1, 2021 12:33 PM

To: SRTC <SRTC@goldengate.org> Subject: Plans for new SRTC

I have been looking at the plans for a new Transit Center, and have a couple comments

- 17-1 1. In several places there is reference to making an "online comment" but there is no link to that page. I have not been able to find it on the website, hence this email.
  - 2. More importantly, as both a pre-COVID patron of the current Center and a resident of an area near downtown San Rafael, I can understand the need for changes to the site. In my quick perusal of the plans, I did not see anything addressing the need for additional parking. If part of the goal is to increase the use of public transit, you also need to address the need to access it.
- The current parking areas will again be insufficient for patrons once ridership returns to pre-COVID levels. How can we take busses to SF, or the train to Santa Rosa if we can't park somewhere near the Transit Center? The TC is not walking distance from my home, and there is no feeder bus line. Taking an Uber or a taxi to and from is unrealistic (due to cost and unreliability).
  - When I took the bus regularly to SF, I would often drive as far as Larkspur to find parking near a bus stop. If the goal is to keep people out of their cars, and off of 101, you need to have a place for us to leave them!
- 3. I hope that the new plans address the confusing situation where the train tracks, bus station and 101 south on-ramp collide. When I am driving east on 2nd St, it is still difficult to know where I could and should stop in different traffic conditions to be safe, and follow the law.
  - 4. I have no opinion about which option for the new SRTC is preferable as I am not a civil engineer, traffic engineer, environmental engineer or city planner. I hope that people who are knowledgeable in these and other relevant areas are offering their comments.

Thank you,

Annette Holloway Resident of San Rafael 415-302-1283

#### 9.2.17.1 Response to Comment Letter 17, Annette Holloway

#### Comment 17-1

1. In several places there is reference to making an "online comment" but there is no link to that page. I have not been able to find it on the website, hence this email.

#### **Response to Comment 17-1**

The San Rafael Transit Center information page may be found at this URL: <a href="https://www.goldengate.org/district/district-projects/san-rafael-transit-center/">https://www.goldengate.org/district/district-projects/san-rafael-transit-center/</a>. As stated on that page, the primary email address for sending online comments is <a href="mailto:SRTC@goldengate.org">SRTC@goldengate.org</a>. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 17-2

2. More importantly, as both a pre-COVID patron of the current Center and a resident of an area near downtown San Rafael, I can understand the need for changes to the site. In my quick perusal of the plans, I did not see anything addressing the need for additional parking. If part of the goal is to increase the use of public transit, you also need to address the need to access it.

The current parking areas will again be insufficient for patrons once ridership returns to pre-COVID levels. How can we take busses to SF, or the train to Santa Rosa if we can't park somewhere near the Transit Center? The TC is not walking distance from my home, and there is no feeder bus line. Taking an Uber or a taxi to and from is unrealistic (due to cost and unreliability).

When I took the bus regularly to SF, I would often drive as far as Larkspur to find parking near a bus stop. If the goal is to keep people out of their cars, and off of 101, you need to have a place for us to leave them!

#### Response to Comment 17-2

The comment expresses concern regarding the availability of parking near the transit center site. As described in the response to comment 5-57, providing adequate parking is not a CEQA issue, but information on parking is provided in Section 6 of the *Transportation Summary Report*, which is appended to the Final EIR as Appendix E (this report was Appendix C of the Draft EIR). Please refer to the responses to comments 5-57 and 5-72 for additional information about the proposed project's effects on parking. This comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are necessary.

#### Comment 17-3

3. I hope that the new plans address the confusing situation where the train tracks, bus station and 101 south onramp collide. When I am driving east on 2nd St, it is still difficult to know where I could and should stop in different traffic conditions to be safe, and follow the law.

#### Response to Comment 17-3

The comment concerns vehicle circulation near the existing transit center. With the relocation of the transit center, bus traffic on 2nd Street would be reduced and the large driveways from the transit center to 2nd Street would be closed. This may help reduce confusion on 2nd Street. Other factors referenced, including the SMART tracks and the US-101 on-ramp, are not proposed for change as

part of the project. Lane designations and striping on 2nd Street are within the purview of the City and Caltrans, and are not related to the project. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 17-4

4. I have no opinion about which option for the new SRTC is preferable as I am not a civil engineer, traffic engineer, environmental engineer or city planner. I hope that people who are knowledgeable in these and other relevant areas are offering their comments.

#### **Response to Comment 17-4**

The comment expresses the commenter's lack of preference for any specific project alternative. Comments from agencies, organizations, and individuals and the responses to those comments are contained in this chapter. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

-----Original Message-----

From: JAMIE MACKIE <mackieisme@hotmail.com>

Sent: Friday, September 24, 2021 2:51 PM To: SRTC <SRTC@goldengate.org> Subject: SRTC DEIR Comment

I support the Move Whistlestop Alternative for the San Rafael Transit Center. However, I have two pieces of feedback on the DEIR.-The proposed pick-up/drop-off area on the east side of West Tamalpais Ave. north of 4th St. conflicts with the preferred route of bicyclists traveling through Downtown San Rafael. The frequent pulling in and out, as well as passenger doors being opened associated with pick-up/drop-off zones is incompatible with low-stress bicycle travel. This area should be located where it does not conflict with bicycle users.-The southbound dual right turn lane at the intersection of Hetherton St. and 3rd St. should be reduced to a single right turn lane. The proposed configuration is dangerous to pedestrians, as the City saw with the two deaths in 2014 and 2016 at the same intersection.

Jamie

Sent from my iPhone

#### 9.2.18.1 Response to Comment Letter 18, Jamie Mackie

#### Comment 18-1

I support the Move Whistlestop Alternative for the San Rafael Transit Center. However, I have two pieces of feedback on the DEIR.-The proposed pick-up/drop-off area on the east side of West Tamalpais Ave. north of 4th St. conflicts with the preferred route of bicyclists traveling through Downtown San Rafael. The frequent pulling in and out, as well as passenger doors being opened associated with pick-up/drop-off zones is incompatible with low-stress bicycle travel. This area should be located where it does not conflict with bicycle users.-The southbound dual right turn lane at the intersection of Hetherton St. and 3rd St. should be reduced to a single right turn lane. The proposed configuration is dangerous to pedestrians, as the City saw with the two deaths in 2014 and 2016 at the same intersection.

#### Response to Comment 18-1

The comment expresses support for the Move Whistlestop Alternative. It also expresses concern with the location of pick-up/drop-off areas relative to bicycle facilities. Please see the response to comment 7-3 for a description of the relocated of pick-up/drop-off area. Regarding concerns with the southbound right-turn at the intersection of Hetherton Street and 3rd Street, please see the response to comment 5-62. The proposed modifications to signal operation at this intersection would benefit pedestrian safety.

From: amy glaza <amyglaza@yahoo.com> Sent: Thursday, September 30, 2021 7:39 PM

**To:** SRTC <SRTC@goldengate.org>

**Cc:** kate.conlin@cityofsanrafael.org; Maribeth Bushey <maribeth.bushey@cityofsanrafael.org>;

city.manager@cityofsanrafael.org

**Subject:** Community Feedback Regarding Moving the Bus Terminal

Hello,

I understand you are soliciting comments about this project.

I live in the Montecito area of San Rafael.

I have a few comments and questions about the bus terminal project.

I have viewed the most recent site location map and information on the website.

1-How will you ensure the "parklike" environment at the terminal does not become a congregating and sleeping area for our homeless population and for people coming to the area to conduct drug deals and pan handle?

2-I often feel traffic flow problems going from the West side to East side of the city are often overlooked. Have you ever tried commuting East on 2nd Street from D Street to get to the Whole Foods on the other side of the 101, which is near where I live? The lane designations make no sense for anyone who is local "Through Traffic". I feel I am taking my life into my hands making that negotiation during commute hours. Try it on a Friday after work and see. The lanes only make sense for people going North or South on 101. Let's stop acting like we are just a throughfare for people passing through our town and getting to their own communities. Let's make the East-West and West-East traffic flow into and out of downtown a priority.

3-Will you please make the Airporter and Taxi section feel separate and comfortable. Let's make visitors from out of town feel welcome and their navigation simple out of the hussle bussle of daily commuters. Also for those of us who fly often for work having a comfortable low congestion area is appreciated.

19-2

19-4

4-Is the homeless tent encampment going to stay under the bridge as it is now? This will certainly mean that "parklike" setting will be the new outdoor living room for the homeless population there.

5- I think the idea of this transit center open space would work better in a smaller city with no homeless or crime issues.

I am skeptical about the plan and would like to be proven wrong about this project. I simply feel it is too big and in the wrong location. Our population has exploded and really it should have been moved away from downtown. SMART Station yes, bus terminal for the entire region, no.

I'd rather see this project moved South 1 exit to be part of the new retail complex across from the post office. There could easily be a SMART stop added there as the tracks go nearby.

19-5

Or it could run the length of Francisco Blvd West. The bike lane that was added there has made that road nearly impassable and totally non- sensical to the businesses along there. The bike coalition really took the city for a ride on that project. Have you ever tried to drive down the length of it in both directions? I actually had to call 911 to report a big rig driving southbound on that road in front of Marshall's Department store in the WRONG lane. Here must have thought it was a one way street, I was nearly in a head on collision.

(I realize my location ideas are too late for consideration but thanks for listening.)

However, I do hope you will help me understand how the other issues I brought up are being handled. I'm sure I am not the only one to being them up.

Thank you.

10\_6

Ps: The East/West and West/East traffic flow into and out of the city is very important. Don't cut us off from our own downtown! As it is, I find myself more easily going from East San Rafeal and turning North onto 101 to go to shop in Novato and avoiding my own downtown. Just to avoid all the train tracks, lights and buses. I want to be proud of our downtown, and not avoid it.

Sent from Yahoo Mail on Android

#### 9.2.19.1 Response to Comment Letter 19, Amy Glaza

#### Comment 19-1

1-How will you ensure the "parklike" environment at the terminal does not become a congregating and sleeping area for our homeless population and for people coming to the area to conduct drug deals and pan handle?

#### **Response to Comment 19-1**

The comment concerns the conditions of homelessness in Downtown San Rafael. Addressing the presence of homeless individuals and dissuading illegal activities (such as drug trafficking) are not issues required to be discussed in CEQA documents. The commenter does not provide evidence showing a connection between such activities and environmental impacts that fall within the purview of a CEQA analysis. A detailed assessment of the existing and proposed conditions regarding public safety can be found in Section 3.13, Public Services and Recreation. This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are necessary.

#### Comment 19-2

2-I often feel traffic flow problems going from the West side to East side of the city are often overlooked. Have you ever tried commuting East on 2nd Street from D Street to get to the Whole Foods on the other side of the 101, which is near where I live? The lane designations make no sense for anyone who is local "Through Traffic". I feel I am taking my life into my hands making that negotiation during commute hours. Try it on a Friday after work and see. The lanes only make sense for people going North or South on 101. Let's stop acting like we are just a throughfare for people passing through our town and getting to their own communities. Let's make the East-West and West-East traffic flow into and out of downtown a priority.

#### **Response to Comment 19-2**

The comment pertains to east- and westbound traffic through the project area. Lane designations and striping on 2nd Street are not within the District's jurisdiction and are not related to the proposed project. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 19-3

3-Will you please make the Airporter and Taxi section feel separate and comfortable. Let's make visitors from out of town feel welcome and their navigation simple out of the hussle bussle of daily commuters. Also for those of us who fly often for work having a comfortable low congestion area is appreciated.

#### **Response to Comment 19-3**

The comment concerns access to airport transportation options at the transit center. One project objective is to provide improved transit connectivity, including all transit services at the transit center. The project includes a number of elements to improve safety and the passenger experience, as noted in Chapter 2, Project Description. The comment does not concern adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 19-4

4-Is the homeless tent encampment going to stay under the bridge as it is now? This will certainly mean that "parklike" setting will be the new outdoor living room for the homeless population there.

5- I think the idea of this transit center open space would work better in a smaller city with no homeless or crime issues.

#### **Response to Comment 19-4**

The comment pertains to the presence of unhoused individuals in the Under the Freeway Alternative footprint. Please see the response to comment 19-1. The comment also expresses concern with the public space/plaza area proposed to be included in the project. All alternatives would include space for public plazas, customer service, bicycle parking, and/or transit-supportive land uses. These spaces are important to the transit center's functionality for transit users. The transit center would be designed in a manner to promote safety by implementing Crime Prevention through Environmental Design best practices where possible, including open sight lines, lighting, and defensible space. The comment does not pertain to the adequacy of the EIR and no revisions to the Draft EIR are required.

#### Comment 19-5

I am skeptical about the plan and would like to be proven wrong about this project. I simply feel it is too big and in the wrong location. Our population has exploded and really it should have been moved away from downtown. SMART Station yes, bus terminal for the entire region, no.

I'd rather see this project moved South 1 exit to be part of the new retail complex across from the post office. There could easily be a SMART stop added there as the tracks go nearby.

Or it could run the length of Francisco Blvd West. The bike lane that was added there has made that road nearly impassable and totally non- sensical to the businesses along there. The bike coalition really took the city for a ride on that project. Have you ever tried to drive down the length of it in both directions? I actually had to call 911 to report a big rig driving southbound on that road in front of Marshall's Department store in the WRONG lane. Here must have thought it was a one way street, I was nearly in a head on collision.

#### **Response to Comment 19-5**

The comment provides suggestions for alternative locations for the proposed project and expresses concerns about driver and pedestrian safety on roads near the project area.

As discussed in Chapter 5, Section 5.4.5, Alternatives Considered but Eliminated from Further Analysis, of the Final EIR, numerous alternatives were considered throughout the development of the proposed project, including alternatives that explored different project sites. The reasons for dismissal of these alternatives from detailed analysis in the EIR are described in Section 5.4.5.

The suggestion to move the transit center south from the existing location and add a SMART stop in this location would not meet the project objective to "provide improved transit connectivity and ease of use in and around Downtown San Rafael."

The concerns expressed by the commenter about traffic and safety conditions on Francisco Boulevard West are outside of the scope of the proposed project, and the District does not have jurisdiction over the bicycle infrastructure along this roadway.

#### Comment 19-6

Ps: The East/West and West/East traffic flow into and out of the city is very important. Don't cut us off from our own downtown! As it is, I find myself more easily going from East San Rafeal and turning North onto 101 to go to shop in Novato and avoiding my own downtown. Just to avoid all the train tracks, lights and buses. I want to be proud of our downtown, and not avoid it.

#### **Response to Comment 19-6**

The comment pertains to east- and westbound traffic in the project area. Please see the response to comment 19-2 for discussion of east and westbound traffic.

----Original Message-----

From: LUANA MILLER < lmi3280257@aol.com> Sent: Thursday, September 30, 2021 8:28 PM

To: SRTC <SRTC@goldengate.org>

Subject: Transit Center Relocation Draft EIR

Cancel the SMART train and save all the funds that must be disbursed continuously to support it and the problems it creates which are never ending!

Sent from my iPhone

# 9.2.20.1 Response to Comment Letter 20, Luana Miller

#### Comment 20-1

Cancel the SMART train and save all the funds that must be disbursed continuously to support it and the problems it creates which are never ending!

#### **Response to Comment 20-1**

The comment expresses concern with the SMART train. The comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are necessary.

----Original Message-----

From: Stephen Spicer <spspice@comcast.net> Sent: Thursday, September 30, 2021 7:59 PM

To: SRTC < SRTC @goldengate.org >

Subject: Transit Center Relocation Draft EIR

Comments - Re: Airporters

I have been frustrated with the change of schedule, lack of access and relocation of the Airporters, especially Marin to Anderson compared to the past where they stopped at the transit center. There may be extenuating circumstances but it is so much more convenient and integrated with downtown, right off the freeway and taxis at the current and hopefully new center!

Thanks, Steve

Stephen Spicer...sent from iPad

cell 415 717 1012

## 9.2.21.1 Response to Comment Letter 21, Stephen Spicer

#### Comment 21-1

I have been frustrated with the change of schedule, lack of access and relocation of the Airporters, especially Marin to Anderson compared to the past where they stopped at the transit center. There may be extenuating circumstances but it is so much more convenient and integrated with downtown, right off the freeway and taxis at the current and hopefully new center!

#### Response to Comment 21-1

The comment concerns access to airport transportation options at the transit center. As stated in Chapter 2, Section 2.6.1, Components Common to All Build Alternatives, all four build alternatives would include airport coach services in the 17 new straight-curb bus bays (page 2-11 of the Final EIR). The preferred alternative (Move Whistlestop Alternative) and build alternatives include a space for airport transportation at the new transit center. Airport transportation services are operated by private entities that are responsible for identifying routes, stops, and schedules. The comment does not concern adequacy of the EIR and no revisions are necessary.

From: Joseph B. Tassone < jtassone@marincatholic.org>

**Sent:** Friday, October 1, 2021 9:23 AM **To:** SRTC <SRTC@goldengate.org>

Subject: Transit Center Relocation Draft EIR

I think this is a huge misuse of funds. There are very few problems that would be rectified by moving the station 1 block. It will also cause traffic and more CO2 in building the new station. Please dont do it. We have no idea how much need there is for mass transit after the changes from Corona

--

## Joe Tassone

Marin Catholic High School

Foundations of History I AP Macro Economics

You may choose to look the other way but you can never say again that you did not know." - William Wilberforce

"If to be feelingly alive to the sufferings of my fellow-creatures is to be a fanatic, I am one of the most incurable fanatics ever permitted to be at large."

- William Wilberforce

#### 9.2.22.1 Response to Comment Letter 22, Joseph Tassone

#### Comment 22-1

I think this is a huge misuse of funds. There are very few problems that would be rectified by moving the station 1 block. It will also cause traffic and more CO2 in building the new station. Please don't do it. We have no idea how much need there is for mass transit after the changes from Corona

#### Response to Comment 22-1

The comment expresses concerns about potential impacts on traffic and carbon dioxide emissions. As outlined in Chapter 2, Section 2.7, No-Project Alternative, the existing transit center has several deficiencies resulting from the implementation of the SMART Phase 2 project. Impacts related to traffic and transportation are discussed in Section 3.14, Transportation. The impact analysis contained in Section 3.7, Greenhouse Gas Emissions, concludes that impacts related to GHG emissions would be less than significant with mitigation. Please refer to the response to comment 5-54 for more information on projected transit demand.

**From:** Stuart Brown <stuart.brown1@comcast.net>

Sent: Saturday, October 2, 2021 11:50 AM

**To:** SRTC <SRTC@goldengate.org>

**Subject:** Transit Center Relocation Draft EIR

The best solution would be to elevate the SMART tracks over Mission through Second streets. This option should be included and a cost estimated.

Stuart H. Brown 85 Main Drive San Rafael, CA 94901

# 9.2.23.1 Response to Comment Letter 23, Stuart Brown

#### Comment 23-1

The best solution would be to elevate the SMART tracks over Mission through Second streets. This option should be included and a cost estimated.

#### **Response to Comment 23-1**

The alternatives analyzed in the EIR are the result of an alternatives development process that considered various locations and layouts for a new San Rafael Transit Center based on previous reports prepared for the proposed project.

Chapter 5, Alternatives to the Project, provides a discussion of alternatives considered but eliminated from further analysis. Modifications to the SMART track alignment, as suggested in the comment, are not within the District's jurisdiction and are therefore outside of the scope of this project.

Raymond Santiago, Principal Planner Golden Gate Bridge, Highway and Transportation District October 6, 2021 via email: srtc@goldengate.org

Subject: Response to the Environmental Impact Report for the San Rafael Transit Center

Thank you for this opportunity. Having reviewed the Cultural Resources Chapters 3.4 and 3.15 of the Transit Center EIR generated for the Golden Gate Bridge, Highway and Transportation District (District), I do have a number of comments and questions.

There is much detail in these chapters that I cannot confirm, but it does create a serious level of concern due to statements that I know to be incorrect. I hope this is not true of information beyond my scope of knowledge as once something is in print it is difficult to dispel.

The following relates only to Chapter 3.4:

A. Specific corrections: The mark-up has been edited to include only those pages affected in (-)

1. Page 1, 1<sup>st</sup> paragraph (p), 2<sup>nd</sup> sentence (s): "Some archaeological sites may also be considered tribal cultural resources." I have not noted many that are not fully tribal related, and "...Section 3.16" change to 3.15. SUGGESTION: It would be better to state clearly here that TCR related information is found in Chapter 3.15; then all information relating to TCR will be found in that chapter and not repeated here. (See Section D below)

2. Page 9 (2), 1<sup>st</sup> p, 4<sup>th</sup> s: "... (both outside the project area) ..." The potentially eligible "East Downtown Core" historic district now includes both sides of Tamalpais between 3<sup>rd</sup> and 4<sup>th</sup>.

3. Page 9 (2), end of  $3^{rd}$  p: "Appendix G." This is seriously misleading, as this appendix is "confidential" why refer to it as "available in ..." – there is nothing there and is again referenced on page 28

4. Page 12 (3), 1<sup>st</sup> p: "Mission San Rafael Archangel ... near downtown San Rafael in 1917." The "Asistencia San Rafael Archangel" was established in 1817 (it became a mission in 1822). Then, about 55 years later, the Marin County Courthouse was built on mission lands. 'A' Street is the center of town historically and currently. Please rephrase similar to "...what was to become the heart of San Rafael's downtown in 1817".

5. Page 13 (4), 1<sup>st</sup> p: This is very confusing and consists of seriously inaccurate information. As the information is credited perhaps this is an example of the difficulty in dispelling printed information.

The North Pacific Coast (NPC) Railroad was established in 1871 but had nothing to do with the construction of the Union Station nor did the Aitchison Topeka & Santa Fe (SF). In an online review there is no mention of the SF being active in the development of rail lines in this area during the 1880s. Please clarify how this information was established or strike/rewrite "The North Pacific Coast RR was established in 1874" and "In 1884, the Santa Fe and North Pacific Railroad built ..."

The North Shore was the line that invented the "Electrics" It was very short lived and was primarily a commuter line as will be noted below, Item A.8.

The Union Station was constructed by the San Francisco & North Pacific Railroad (est. 1877) in 1884 after completion of the Puerto Suello tunnel a few years earlier when the site on Tamalpais Avenue was selected for the passenger station. Peter Donahue was one of many "railroad barons"; I understand that he was instrumental in strong-arming other smaller railroad developers out of business. (See ownership flow chart page 14 & 15 in "The Northwestern Pacific Railroad – Lifeline of the Redwood Empire, Boom and Bust 1951-2001", Angelo Figone, NWPRR Historical Society, 2017)

6. Page 13, 2<sup>nd</sup> p, 1<sup>st</sup> s: This is a simplistic and therefore incorrect statement. The NPC became part of the North Shore in 1902. The San Rafael & San Quentin was another of the 10 railroad companies that were consolidated by the Santa Fe (SF) and Southern Pacific (SP) in 1907. (See flow chart noted in A.5)

24-1

24-4

- 7. Page 13, end of 2<sup>nd</sup> p: It was the consolidated NWP (both SP and SF) that built several stations along the route. The dissolution of the NWP occurred <u>2 weeks</u> before the 1929 San Rafael Depot opened.
- 8. Page 13, end of 3<sup>rd</sup> p: "Commuter rail service in Marin County, the electrics, was discontinued ...". This is a common and confusing statement as passenger service continued until the late 1950s.
- 9. Page 14 (5), 3<sup>rd</sup> p, 2<sup>nd</sup> s: "The San Rafael depot closed in 1974, when local freight service was discontinued..." NWP became part of SP, this area being operated by the headquarters in San Francisco. In San Rafael freight service continued into the early 1990s.
- 10. Page 20 (6), "Historic Map Review" 2<sup>nd</sup> p, 4<sup>th</sup> s: Incorrect reference See item A.5. 24-10
- 11. Page 21 (7), last p: The final DTPP identified only two potential historic districts. Next sentence "None 24-11 of the resources in the CEOA study area is among the locally listed resources." Both 927 and 930 Tamalpais are on the 1978 and 2020 inventories; does this statement refer to the local landmark register?
- 12. Page 22 (8), 2<sup>nd</sup> p: "(Neither of these eligible districts overlaps with the CEQA study area.) This statement is out of date as both 927 and 930 Tamalpais are within the "East Downtown Core" eligible districts. Just below, "E: Ineligible as local landmarks" has since been eliminated as a rating. As the GP 2040 and the DTPP have already been accepted by the City Council before this DEIR for the SRTC was published; why does this EIR relate most often to the out-of-date GP 2020.
- 13. Page 22, 4<sup>th</sup> p: Why does the residence at 1011 Irwin receive a "B" rating? The only reason I can imagine is, should the "Under the Freeway" alternate be chosen, it would place it "in the way", making removal/ demolition more difficult and greatly more expensive with the mitigation measures required. It is a rather common residence found in many neighborhoods in the city. It has no known history and an obviously out of character brick entry staircase unrelated to its date of construction. To be clear, I do take issue with several of the 2020 historic resource nominations and omissions.
- 14. Page 23 (9), 2<sup>nd</sup> p, 1<sup>st</sup> s: Address error <del>730</del> correct to <del>930</del> Tamalpais. 24-14
  - 15. Page 23, 2<sup>nd</sup> p, 3<sup>rd</sup> s and on: It is my opinion that the 2012 JRP evaluation was expressly written to demolish the NWP Depot. I also suspect it was written by underqualified persons as it is very poorly composed, bouncing back and forth around the building like a ping-pong ball. This appears intentional, to make the elements as described difficult to track. A couple of examples include:
    - a. Sheet 523A, Page 1 of 17 "All of the arched parapets on the building are replacements ..." This is inaccurate, 3 appear to be original 1929 raised "shaped Mission parapets" (SMP); even if they were replacements, they are identical to and located in historically accurate positions. A fourth SMP from the mid-1940s NWPRR headquarters addition was also built during the railroads period of ownership; considered the buildings "Period of Significance".
      - The 2012 evaluation totally ignores anything since the set point of 1929. Even the National Park Service recognizes that buildings change over time depending on the needs of the occupants/owners. The locations of the 1929/1945 SMPs are illustrated on the attached plan "Order of Development – Floor Area Estimate", dated October 5, 2021.
    - b. Sheet 523A, Page 3 of 17, 2<sup>nd</sup> paragraph, 5<sup>th</sup> sentence: "The arches are mostly filled with metal entry doors, and eight-over-eight metal hopper windows." Again, the evaluators did not appear to have architectural training as the reference to "hopper windows" is incorrect. Hoppers open to the interior and swing in from a bottom hinge. Here the original windows are awning windows which open out and are hinged from the top.
    - c. In 2015 an earlier architectural historian reviewed the 2012 JRP Evaluation and found "that the JRP evaluation is flawed and its conclusions are not substantiated ... They merely conclude that there is a loss, without establishing a factual basis and doing an analysis ... The building still conveys its historic significance as a railroad station". (Richard Brandi, San Francisco)

Here again the DEIR refers to an out of date rating for the depot building which was upgraded to a "C". I do not give much credence to the new ICF DPR 523 mentioned later; once again, 927 and 930 Tamalpais complicate the Districts preferred alternative. Historically the depot should be given an "A" (even with the later additions which could be removed) and the taxi office at a minimum a "B" as contributory.

16. Page 23, 2<sup>nd</sup> p, 6<sup>th</sup> s: Why is the SRH 2020 DPR 523 dated January 8, 2020 referred to merely as a "site record". It is my understanding that if accompanied by a cover letter written by an officially listed architectural historian the document would carry the same weight as one officially signed by one.

The evaluator (the undersigned), although not trained in the field, has been actively involved in San Rafael's historic resources since the late 1970s. While compiling the above referenced document, I was extensively (and repeatedly) schooled by a listed architectural historian to bring this DPR into conformance with the standards required for official State documentation. Diana Painter, of Painter Preservation, noted in her April 2020 cover letter "There is no question of the importance of this building and site to San Rafael and the region's history ... it is undoubtedly significant for its design ... The fact that few original stations remain increases the importance of this building".

17. Page 32 (10), 2<sup>nd</sup> p below "Mitigation Measures": The statement that "... shall be reviewed and approved by the District and Planning Division to ensure ..." It is my understanding that the City of San Rafael and City Council has the final say on what will be happening on their city streets. In the "Memorandum of Understanding" Item 4 outlines the cooperative relationship between partners. Item 5 states "The parties agree that the selected alternative must be approved by the City Council". This cooperation is not mentioned anywhere that I can locate.

#### B. General comments:

- 1. "ICF International" and "ICF" occur variously until becoming simply "ICF" finally on Page 23. This should have started when first mentioned at the beginning of the chapter and followed through thereafter.
- 2. The total disregard for the development of San Rafael (and other towns and cities in Marin) as a "railroad suburb" of San Francisco is why I believe the repeated undervaluation of the NWP Depot occurs. The depot is the most prominent, extant example of this historically important event for San Rafael. No matter what basis is used the fact that throughout the documents the depot and taxi office are pushed aside as "not eligible" is a faulty conclusion. It seems as if the buildings are "in the way" so therefore not to be considered important or require mitigation measures. There is a short reference to the arrival of the railroad on page 12 but nothing else. This sweep-under-the-carpet occurs often on later pages, especially under 3.4.2.3 (Page 28 to 34) so I do not repeat my concerns.
- 3. I do not have a problem with the District maintaining their services in the structure but this should be done only with careful restoration/rehabilitation using the Secretary of the Interiors Standards to raise the building's qualification for state and/or national listing. Local historic register listing should be the primary focus. Landmark status can be established locally by any agency whether or not the building qualifies for national or state status.

#### **C.** Preferred Alternatives:

- 1. It should be noted that the undersigned is <u>very against</u> any proposed alternative that would modify Tamalpais Avenue in any way. Yes, it is funky, that is why it is classically "historic". The National Hotel at 703-705 Fourth Street could be restored to receive a rating as it is a candidate for the use of incentives.
- 2. Under the Freeway Alternative: Of those proposed, this citizen supports this alternative. Mentioned variously as dark, cold, uninviting and lacking in security this could easily be mitigated to become a bright, inviting space. An example would be the pedestrian tunnel connecting terminals at Chicago's O'Hare Airport. It runs below airplane taxiways but with the use of varying lighting techniques and soothing sounds the space becomes an exciting environment oblivious to the hazards above. Here in San Rafael, the need to create covered space is reduced because of the presence of the viaducts of the 101 overpasses.
- 3. A Preferred Option: Retain the Bettini Transit Center east of the SMART tracks: Probably the least expensive option would be to add a pedestrian bridge to link the Citibank parcel. This would also have the least detrimental effect on the historic resources in the station area and be cost effective. I understand that the sale of this parcel is expected to help pay for the new transit center development, but with less alterations needed, the required funds would be less if this suggestion were to be accepted.
- 4. Even if the parcel mentioned in B.4 were to be sold the very useful bus bays between  $2^{nd}$  and  $3^{rd}$  on Hetherton should be part of that future developments program.

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24-22

24-21

**D.** Preliminary discussion on the separation of information between Chapters 3.4 and 3.15:

It is difficult to fully critique the two chapters in this correspondence. The most comprehensive and very complicated are concerns that relate to elements repeated in both or in other cases seeming misplaced in one or the other chapter. This results in mind-numbing repetition and an overuse of paper when published in hard copy. I will attempt to suggest how this may relate to both chapters under separate cover.

<u>Chapter 3.4 – Cultural Resources:</u> This chapter should handle the "built environment resources" relating to the changes that occurred with and after the arrival of the Franciscan missionaries and the soon to occur influx of mostly European settlers. The information on "Prehistory" should <u>not</u> be in this chapter, it could be cross-referenced to the "Tribal Cultural Resources" (TCR); it does not relate as non-natives were not here. As stated in the intro of this letter, this chapter should start with a statement that directs the reader to the TCR which would result in an overall simplification of both.

<u>Chapter 3.15 – Tribal Cultural Resources:</u> should include all "archaeological resources" and elements relating to prehistory up to and including the impact the arrival of the missionaries had on the Native American people.

What happened to the native population? They could no longer live the life of hunter/gatherer/stewards as the loss of their ability to wander by the season was halted. This occurred first by the subjugation of many for the mission system, later their former lands were divided into rancheros then, with the influx of settlers, their thousands of years of freedom ended.

In the mission system much of the native population was enslaved very similarly to the African population in the east and south of this country. Here, if a neophyte was unhappy with his lot and took off, he or she would be found, brought back and beaten into submission. With the creation of the State of California the native population was not allowed citizenship; few if any rights or attendance in institutions of learning was allowed.

In conclusion, I have only concentrated on my areas of interest in the DEIR. There is general approval of the adaptive reuse of the depot. Its importance to the development of San Rafael seems to be lost on the teams hired by the District and others. I honestly feel they do not want this building to be significant because it would be inconvenient. I prefer to see the buildings on the west side of Tamalpais remain intact and request the District stay clear of the depot and any alterations to West Tamalpais Avenue.

As a landscape architect I have done site measurements multiple times over the decades of my career. The attached plan was first generated for the NWP Depot Landmark Application mentioned in Item A.16. The plan is to scale with the exterior walls accurately depicted and includes estimates of square footage for the entire existing building. Hope this is of use to the planning team.

I will send suggestions for reorganizing Chapters 3.4 and 3.15 under separate cover. A mark-up of Chapter 3.4 is also attached with the illustrated comments in orange. Other markings relate to the repetitive nature of many areas that belong in Chapter 3.15. Thank you for taking this letter into consideration as you proceed with finalization of the project Environmental Impact Report.

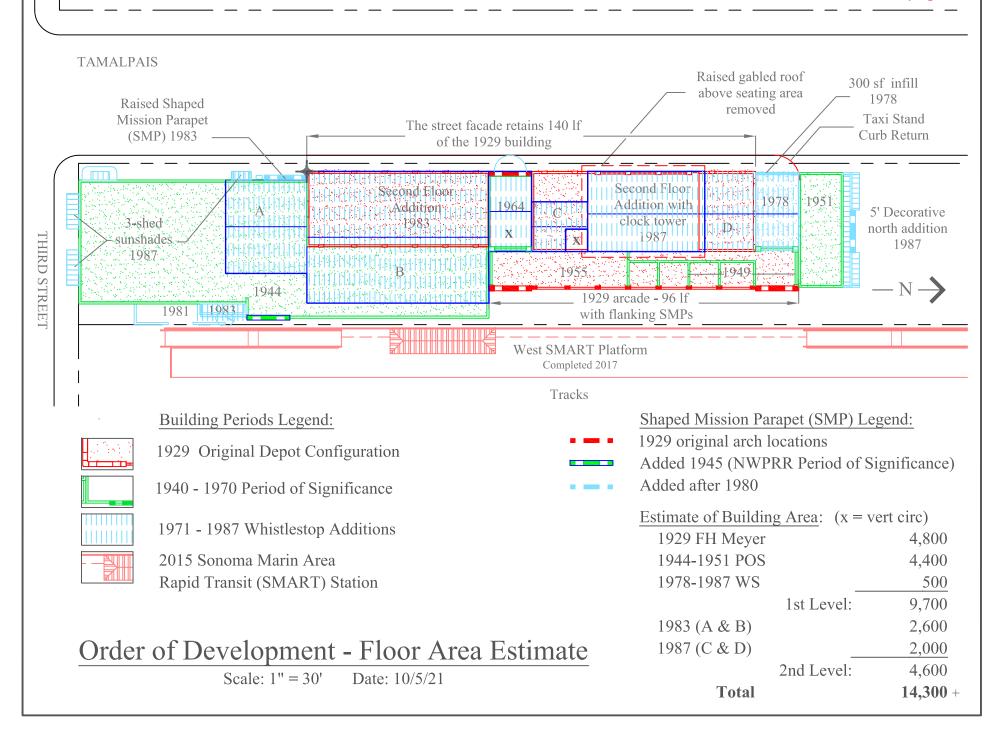
Sincerely,

Leslie Simons San Rafael Resident

Attachment: "Order of Development – Floor Area Estimate", October 5, 2021.

Chapter 3.4 Cultural Resources mark-up

# Comment Letter 24 attachment, page 1



# Section 3.4 **Cultural Resources**

The term *cultural resources* refers to sites, objects, buildings, structures, burials, districts, and landscapes. In this section, buildings, structures, districts, and landscapes will be referred to as *built environment resources*, and sites, objects, and burials as *archaeological resources*. Some archaeological sites may also be considered tribal cultural resources. Tribal cultural resources are discussed in Section 3.16. A *historical resource* is defined in California Environmental Quality Act (CEQA) Section 21084.1 and State CEQA Guidelines Section 15064.5 as one that meets at least one of the following criteria:

- A resource listed in, or determined by the State Historical Resources Commission to be eligible for listing in, the California Register of Historical Resources (CRHR) shall be considered to be historically significant (California Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g) shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4852).

A lead agency is allowed to determine that a resource may be a historical resource, as defined in PRC Sections 5020.1(j) or 5024.1, even if it is not listed in, or determined to be eligible for listing in, the CRHR; not included in a local register of historical resources, pursuant to PRC Section 5020.1(k); or identified in a historical resources survey meeting the criteria of PRC Section 5024.1(g).

# 3.4.1 Existing Conditions

# 3.4.1.1 Regulatory Setting

## **Federal**

Although the proposed project is not anticipated to require compliance with Section 106 of the National Historic Preservation Act at this time, the National Register of Historic Places (NRHP) and federal guidelines related to the treatment of cultural resources are relevant for the purposes of determining whether cultural resources, as defined under CEQA, are present and guiding the

### **Downtown San Rafael Precise Plan**

As of March 2021, the City of San Rafael is in the process of preparing the *Downtown San Rafael Precise Plan* (City of San Rafael 2020b). The City released a public review draft of the document in December 2020. The preparation of the plan involved an updated historical resources survey of the Downtown area, which is described in Section 3.4.2.1, Methodology, under "Built Environment Resources in the Plan Area." The *Downtown San Rafael Precise Plan* identifies two new potentially landmark-quality historic districts in the Downtown core (both outside the project area) and provides recommendations regarding updates to the City's historic preservation ordinance. The recommendations include establishing a historic preservation commission or changing the City's project review roles, highlighting preservation incentive opportunities, revising landmark designation criteria, and updating historic district documentation standards. The draft *Downtown San Rafael Precise Plan* also outlines a review matrix for allowable changes to designated historical resources in the Downtown area.

# 3.4.1.2 Environmental Setting

The environmental setting of the project area consists of the existing conditions and relevant historical conditions of the CEOA study area, which is limited to the footprints of the four alternatives being considered in addition to the entirety of one parcel (Assessor's Parcel Number 011-275-02) partially overlapped by the footprint. This parcel contains a historic-aged building. 709–711 4th Street, that is immediately adjacent to the boundary of the project footprint. The CEQA study area is delineated to consider potential impacts on built environment and archaeological resources as a result of project activities, including ground disturbance, as well as alteration, relocation, or demolition of buildings in the project area. The proposed project could also result in changes to the setting of built environment resources adjacent to the project area. However, the proposed project exists in a developed area at the eastern edge of Downtown San Rafael, which has experienced a continuum of gradual change over the course of more than 100 years that is generally consistent with the degree of change proposed by the proposed project. There appears to be a very low likelihood that any project activities would change significant characteristics in the setting of any built-environment historical resource adjacent to the project area. As such, adjacent built environment resources that the proposed project would not physically change are not included in the CEQA study area.

This section describes the development and general physical attributes of properties within the CEQA study area, provides an overview of the development of Downtown San Rafael as related to cultural resources, and presents a summary of known built environment and archaeological resources evaluations for CRHR eligibility and their status as historical resources pursuant to CEQA, as well as the potential for the project area to contain as-yet undocumented archaeological resources and human remains. Further details on the resources' characteristics and history are available in Appendix G.

# **Existing Environment**

The project area lies within the North Bay Region of the San Francisco Bay area, where warm, dry summers are complemented by cool, wet winters with an abundance of rainfall, averaging 25–50 inches per year. This unique climate is complemented by a diverse topographic landscape bounded on the west by the Pacific Ocean, to the east by low coastal mountains and the Central Valley, and to the south by the southern coast mountain ranges. Accordingly, this region has a rich and diverse

years, Spanish missionaries such as Gabriel Moraga (1812–1814), Luis Arguello, Father Blas Ordaz, and John Gilroy (1821) began settling the region now commonly referred to as the Bay Area, establishing missions including Mission San Francisco de Asís in San Francisco and Mission San Rafael Arcángel near present-day San Rafael in 1917 (Beck and Haas 1974:18; Fanning 2007:8–9; Kyle et al. 1990:174-175).

Mission ... settlements Between the 1830s and 1840s, Marin County land was deeded under Mexican land grants. Twentyone large land grants were distributed among settlers and military figures, including landowners William Richardson and John Reed on Rancho Sausalito. Other land grants such as Corte Madera Del Presidio and Punta De Quentin encompassed present-day Larkspur (Alley 1972:95; Fanning 2007:8-9, 27).

Marin County remained largely unsettled during the Spanish and Mexican Periods. Mission San Rafael was abandoned in 1844 as Mexico and the United States struggled for territory in the region. In 1848, the United States defeated Mexico in the Mexican-American War and Mexico surrendered its Alta California land through the Treaty of Guadalupe Hidalgo.

Also in 1848, James Wilson Marshall discovered gold in El Dorado County in the Sierra foothills. News of gold discovery brought fortune-seekers from all over the world to California and demand for land in the state began increasing. By 1849 settlers entered the region in search of gold along the Corte Madera Creek. When the state of California was formed in 1850, Marin County was one of its original 27 counties.

Within a few years the abundance of gold declined, and miners turned to logging for land clearance. By the mid-1850s, ranchers and farmers had begun private operations in Marin County. During the 1870s, railroads began laying down tracks in the region in service of the timber and agricultural trade. Small towns such as San Rafael, Larkspur, and Corte Madera were founded in the county as a result of railroad development, which provided access, goods, and employment (Fanning 2007:93; Kyle et al. 1990:xiv-xv, 177).

During the early to mid-20th century, transportation expansion resulted in residential development in Marin County. Although railroads continued to expand throughout the county during the 1910s and 1920s, automobile popularity ultimately led to a decline in railroad use and development in favor of auto-oriented suburban development. Railroad progress ceased after the 1937 opening of the Golden Gate Bridge (U.S. Highway 101 [US-101]), which allowed residents to travel to Marin County from San Francisco via highway. By the late 20th century, Marin County had an established residential community with a population of approximately 250,000 residents (Fanning 2007:93; Marin Economic Commission 2007).

# City of San Rafael

Surveyors first laid out the San Rafael town site in 1850: it became the county seat soon after and has remained so since that time. San Rafael grew quickly as it benefited from a flourishing cattle trade and its connectivity to San Francisco and other urban centers via steamboat (Levy 1976:16B). Growth patterns were further accelerated by the completion of the San Rafael & San Quentin Railroad in 1870. This railroad increased access to and from San Francisco and popularized Marin County as a retreat for San Francisco families (GANDA 2004a:11). The rail line was 3.5 miles in length and traversed marshy conditions between San Rafael and Corte Madera Creeks in order to bring passengers to the ferry landing in present-day San Quentin. The line's tracks roughly followed what is now Anderson Drive (Marin History Museum 2020).

#### This is totally incorrect

1871

A separate regional line called the North Pacific Coast Railroad was founded in 1874 and became the North Shore Railroad in 1902. The North Shore Railroad operated across Marin and Sonoma Counties, transporting both goods and passengers between Sausalito and Cazadero. In 1884, the Santa Fe and North Pacific Railroad built the shed-style San Rafael Union Station west of Tamalpais Avenue at the eastern end of the City's Downtown commercial district (DeGeorgey 2010). Multiple branches served San Rafael, with the tracks aligning along Tamalpais Avenue. In 1884, residences simultaneously developed adjacent to San Rafael's rail depot building and continued to fill nearby lots through the 1890s and early 1900s (ProQuest Digital Sanborn Maps 1894:13, 1907:17). The following is simplistic - along with many other lines consolodated into the NWP Under a larger consolidation effort undertaken by the Southern Pacific Railroad and Santa Fe Railway, the North Shore Railroad merged with the San Rafael & San Quentin Railroad in 1907 and became the Northwestern Pacific Railroad (NWP), a regional rail line that served the north coast of California (Pacific Coast Narrow Gauge 2016). NWP facilitated the transport of redwood timber from Northern California to markets in San Francisco and came to be known as the Redwood Empire Route (GANDA 2004a; AECOM 2014). The Southern Pacific Railroad acquired the NWP line in full in 1929, the same year that Sir Francis Drake Boulevard was extended west to Point Reves Station. Why does that Southern Pacific Railroad built several depots along the route and also replaced San Rafael Union Matter? Station in 1929 with an updated Mission Revival-style depot building that included expanded indoor waiting areas and a café (ICF International 2013), again, simplistic and partially incorrect built as part of the consortium, SF sold out only weeks before the opening The federal government authorized funding in 1925 to establish US-101. The federal highway generally followed existing state and local routes between San Diego, California, and Seattle, Washington; its route passed through Marin County. Construction of the portion of US-101 in Marin County was completed in 1931 with the construction of a bridge over Richardson Bay near Mill Valley, Immediately east of Downtown San Rafael, US-101 followed a route between Tamalpais Avenue and Irwin Street. Construction of the highway required the demolition of residences and commercial properties in its path, including part of the early 1900s lumber yards (ProQuest Digital Sanborn Maps 1924:19, 1950:19). At the same time, the Great Depression led to a substantial decline in passenger use on the NWP and an almost complete halt in freight transportation (AECOM 2014). This, in combination with the rise in personal automobile ownership and the expanding highway system across the region, led to the decommissioning of several branch lines in Marin and Sonoma Counties. By the mid-1930s, the automobile had replaced rail as the preferred mode of travel and the NWP had abandoned over 138 miles of track (AECOM 2014). The construction of the Golden Gate Bridge in 1937 connected Marin to San Francisco via US-101 and solidified the transition in regional transportation from combined rail/ferry to automobiles. Commuter rail service in Marin County was discontinued altogether in 1941 (Landecker 2016). Electrics

That same year, the portion of US-101 in San Rafael was elevated via a two-lane viaduct to accommodate the increase in automobile traffic along the highway (Caltrans 1999). World War II brought an increased military presence to southern Marin County: shipyard jobs and the establishment of the United States Army Hamilton Field north of San Rafael resulted in an economic boon to the area (Levy 1976:16B). Following the end of World War II, many of the local wartime workers decided to stay in the Bay Area and settled in Marin County. Sanborn maps reveal that residential construction increased within a few blocks of the San Rafael depot between the 1920s and 1950s (ProOuest Digital Sanborn Maps 1924:19, 1950:19).

Traffic through San Rafael continued to increase in tandem with the local postwar population boom and associated residential development in the 1950s. The Richmond-San Rafael Bridge opened in 1956, which increased congestion in the city. The original raised viaduct was converted to

northbound-only lanes, and a parallel southbound viaduct was built in 1964, encroaching upon the air space near Tamalpais Avenue in San Rafael. The southbound viaduct was widened further in 1971 (Caltrans 1999).

The City's existing Downtown commercial and railroad corridors, both located just off the highway, made them an opportune location for the establishment of service stations and other automobile-related businesses in the 20th century. A Sanborn fire insurance map from 1924 shows two gasoline stations within the area surrounding the original San Rafael Union Station building on Tamalpais Avenue. After commuter rail service was discontinued, Greyhound Lines constructed a bus station adjacent to the current depot building that provided connectivity between San Francisco and NWP's Northern California lines that terminated at San Rafael at that time (Baseline Environmental Consulting 2020). The 1950 Sanborn fire insurance map illustrates a transit hub adjacent to the highway centered around the Greyhound bus station, with eight additional gas stations having been established as well as several car washes and auto sales lots in the area (Baseline Environmental Consulting 2020; ProQuest Digital Sanborn Maps 1950:19).

Residential and commercial development picked up in Downtown San Rafael after 1970 (Baseline Environmental Consulting 2020). The San Rafael depot closed in 1974, when local freight service was discontinued, and NWP halted rail service south of San Rafael altogether in 1981 when the railroad tunnel between San Rafael and Larkspur closed (AECOM 2014). Residents today depend on a combination of bus lines, personal vehicles, and ferry transit to commute to San Francisco. However, some sections of the NWP line remain in use in Marin County. In 2017, renewed interest in passage service led the Sonoma-Marin Area Rail Transit (SMART) agency to begin its operations in San Rafael (City of San Rafael 2020d).

# 3.4.2 Environmental Impacts

This section describes the impact analysis related to cultural resources for the proposed project. It describes the methods used to determine the project-level impacts and lists the thresholds used to conclude whether an impact would be significant under CEQA. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany the discussion of each identified significant impact, as applicable. Four different build alternatives, the Move Whistlestop Alternative, the Adapt Whistlestop Alternative, the 4th Street Gateway Alternative, and the Under the Freeway Alternative—which are all in Downtown San Rafael within 500 feet of the existing transit center—are being evaluated. Impacts for the build alternatives are presented together unless they differ substantially among alternatives.

# 3.4.2.1 Methodology

The impact analysis for cultural resources was conducted by evaluating the potential impacts on historical resources meeting the definition presented in PRC Section 21084.1 and State CEQA Guidelines Section 15064.5 (inclusive of built environment resources, archaeological resources, and human remains). The proposed locations of transit center facilities under the various build alternatives were evaluated for their potential to cause impacts on historical resources during construction and operation. As outlined below, a range of methods informed the identification of historical resources that could have the potential to be affected by the construction or operation of the San Rafael Transit Center. Per State CEQA Guidelines Section 15064.5(b)(2), the analysis

- CEQA Tribal Consultation List (AB 52)
- Identification by NAHC of any Native American resources within the subject lands that are listed in the Sacred Lands File

A response from NAHC was received on October 29, 2018, and stated that a search of the Sacred Lands File did not identify any sites; however, the letter specified that the area is sensitive for potential tribal resources.

The response from NAHC included the following individuals and tribal representatives who might have an interest in the proposed project:

- Gene Buvelot, Federated Indians of Graton Rancheria
- Greg Sarris, Chairperson, Federated Indians of Graton Rancheria

These individuals were contacted to initiate consultation under AB 52 if desired. Certified letters were mailed via priority mail on November 7, 2018. No responses were received from any of the contacts.

# Review of City of San Rafael Planning Division and San Rafael Heritage Files

Between August 2018 and January 2021, ICF architectural historians consulted with staff members from the City of San Rafael Planning Division as well as members of San Rafael Heritage regarding past built-environment resource surveys and evaluation efforts that have occurred in the CEQA study area. City of San Rafael staff provided ICF with records from the 1976–1978 San Rafael Historical/Architectural Survey (City of San Rafael 1986), as well as additional evaluations of the Whistlestop building at 930 Tamalpais Avenue that are not held by NWIC. San Rafael Heritage provided materials prepared in 2020 to support a local landmark designation application for the NWP Railroad Depot at 930 Tamalpais Avenue. These materials informed the built-environment resource evaluation efforts that ICF conducted in support of the Draft Environmental Impact Report (EIR).

# **Historic Map Review**

Historic aerials, topographic maps, and geologic maps were consulted to determine potential sensitivity with respect to encountering buried historic-era archaeological resources within the project site.

The town of San Rafael was incorporated in 1874, 57 years after the founding of Mission San Rafael Arcángel. An 1850 map shows a cluster of eight buildings labeled the "Mission de San Rafael" to the south of San Rafael Creek (Ringgold and Stuart 1852). By 1873, the San Quentin and San Rafael Railroad and the San Rafael Turnpike extended to San Rafael and continued north to Novato (Austin and Whitney 1873). The North Pacific Coast Railroad had a terminus in San Rafael, near the San Quentin and San Rafael Railroad, but the two do not appear to be connected. At that time there were a number of streets within the town, which began to the west of the farthest extent of the swamp surrounding San Rafael Creek. The railroad and turnpike appear to have maintained their positions over the years, with the project area crossing that alignment. By the turn of the century, San Rafael's city center had a well-developed street grid with over 100 buildings and San Rafael Creek had been channeled away from the town (USGS 1897). Throughout the 20th century, the creek and surrounding swamp continued to be channeled and drained to make room for additional development as San Rafael expanded to the southeast (USCGS 1926; USGS 1941). Mid-20th century

aerial photos show that most of the town was residential in character (Aerial Archives 2020). There were some government buildings to the west of the turnpike and industrial areas in the southeastern quarter near the railroad, turnpike, and water. There were several open lots in areas around the creek that were reclaimed by the swamp. The presence of historic-era development suggests an increased potential to encounter previously unrecorded historic-era archaeological resources during project-related ground disturbance.

# **Built Environment Resources in the Project Area**

The following section presents details regarding the built environment resources in the project area that qualify as historical resources under CEQA. As described in the introduction to this section, a property is considered a historical resource under CEQA if it is listed in or formally determined eligible for listing in the CRHR; is included in an adopted local register; is identified as significant in a qualifying historical resource survey; or is otherwise determined by the CEQA lead agency to be historically significant. This overview of built environment resources first describes the historical resource identification efforts that occurred prior to the preparation of this Draft EIR, and then presents information on the supplemental survey that ICF conducted to support the assessment of potential impacts in the Draft EIR.

# San Rafael Historical/Architectural Survey

Between 1976 and 1978, the City of San Rafael and consultant Charles Hall Page & Associates undertook a built environment survey of select properties in San Rafael; this effort is known as the San Rafael Historical/Architectural Survey. Investigators recorded resources on Historical/Architectural Survey Forms and Department of Parks and Recreation (DPR) Historic Resource Inventory forms and assigned ratings of "Good," "Excellent," and "Exceptional" to all surveyed resources.

The *San Rafael Historical/Architectural Survey* included five properties in the CEQA study area, to which investigators assigned ratings of "Good" or "Excellent":

- 633 5th Avenue
- 637 5th Avenue
- 927 Tamalpais Avenue (Barrel House)
- 930 Tamalpais (NWP Depot)
- 709-711 4th Street (Tavern on Fourth)<sup>1</sup>

The City selected 16 individual resources and three historic districts identified in the survey to be added to the local register of historical resources. None of the resources in the CEQA study area is among the locally listed resources. The City administratively updated the survey in 1986 but did not revise any of the survey forms completed in the 1970s. The remaining properties on the list that were not designated as landmarks are considered "potential historic resources" (City of San Rafael 1986, 2020c:1-1).

SRH vehemently wishes to change this

<sup>&</sup>lt;sup>1</sup> Note that the CEQA study area includes 709–711 4th Street because a portion of its parcel overlaps the project footprint. However, the project does not propose to physically alter the building at 709–711 4th Street.

The City of San Rafael Planning Division's environmental review procedures specify that any resource recorded in the *San Rafael Historical/Architectural Survey* "must be presumed a significant [historical] resource, unless evidence to the contrary is provided" (City of San Rafael 2015).

# 2019–2020 Downtown San Rafael Precise Plan Historic Resources Survey

During 2019 and 2020, the City conducted a built environment survey to inform the preparation of the *Downtown San Rafael Precise Plan*. Building upon the findings of the 1970s *San Rafael Historical/Architectural Survey*, the *Downtown San Rafael Precise Plan Historic Resources Survey* reviewed past survey evaluations of built-environment resources in the *Downtown San Rafael Precise Plan* area. This area encompasses the entirety of the CEQA study area established for the current investigation. The 2019–2020 survey involved a review of 572 parcels in the plan area and identified two landmark register-worthy historic districts: the West Downtown Core Historic District and East Downtown Core Historic District. (Neither of these eligible districts overlaps with the CEQA study area.) Approximately 160 properties in the plan area received one of the following five preliminary ratings:

- A: Eligible for consideration as local landmarks
- B: Likely not eligible individually but could be considered eligible as contributing resources in a historic district
- C: Require additional research
- D: Likely ineligible
- E: Ineligible as local landmarks

The preliminary ratings are not final and are intended to inform further investigation rather than determine CEQA historical resource status. Several buildings in the CEQA study area received preliminary ratings of A through E, which are presented below in Table 3.4-3.

Following this preliminary review, the City selected approximately 40 built-environment resources for intensive-level survey and evaluation. For each of the selected built-environment resources, investigators completed a DPR 523-series form set that documents a new evaluation of the resource for eligibility for listing in the NRHP and CRHR. One building in the CEQA study area, the residence at 1011 Irwin Street, was documented on a DPR form set as part of the 2019–2020 survey. The City found the residence to qualify for listing in the NRHP and CRHR and assigned it a California Historical Resource Status (CHRS) code of 3S, "Appears eligible for the NRHP as an individual property through survey evaluation." Therefore, 1011 Irwin Street meets the definition of a CEQA historical resource (City of San Rafael 2020c; Morgan and Brunzell 2020).

#### **Additional Previous Evaluations**

In addition to the built-environment surveys described above, various past investigations have recorded and evaluated the following built-environment resources within the project area:

• <u>703–705 4th Street</u>: Garcia and Associates recorded this two-story commercial building in 2004 as part of the SMART Historic Architectural Resources Inventory and Evaluation and assigned it a CHRS code of 6Z: found ineligible for NRHP, CRHR, or local designation through survey evaluation. The 2004 evaluation found the building not to be a historical resource for the purposes of CEQA (GANDA 2004b).

National Hotel SW corner 4th & Tamalpais

- Northwestern Pacific Railroad: The alignment of the NWP generally follows Tamalpais Avenue through Downtown San Rafael and the project area. Historically, this rail alignment entered Marin County north of Novato and continued south through San Rafael to terminate at Point Tiburon. To support past cultural resource studies, numerous investigators have evaluated segments of the NWP in Marin, Sonoma, Mendocino, and Humboldt Counties. In Marin County, investigators recorded and evaluated segments of the rail alignment and associated features (such as trestles and tunnels) under the primary number P-21-002618. In 2014, Patricia Ambacher of AECOM recorded the 1-mile-long segment of the NWP between Anderson Drive and 4th Street in San Rafael, which includes the portion of the rail alignment in the project area. AECOM's 2014 evaluation found the recorded segment ineligible for listing in the NRHP and the CRHR, and assigned the rail alignment a CHRS code of 6Z (AECOM 2014). With regard to the current investigation, the rail alignment does not meet the definition of a CEQA historical resource.
- Northwestern Pacific Railroad Depot: Surveyors recorded the NWP Railroad Depot at 730 Tamalpais Avenue (also known as the Whistlestop, after its current tenant) during the San Rafael Historical/Architectural Survey and assigned the building a rating of "Good" (City of San Rafael 1986). However, the property owner substantially altered the NWP Railroad Depot after its initial recordation in the 1970s, and subsequent evaluations have reassessed the significance and integrity of the building. JRP Historical Consulting recorded the NWP Railroad Depot in 2012 and presented an assessment of the building's CEOA historical resource status, as defined in the CEQA statute (PRC Section 5024.1) and the State CEQA Guidelines. The 2012 JRP evaluation ultimately concluded that the NWP Railroad Depot does not qualify as a historical resource under CEQA (JRP Historical Consulting 2012). ICF International subsequently evaluated the building in 2013 as ineligible for listing in the NRHP and CRHR but incorrectly stated the building is listed in the local historic register, which would qualify it as a CEQA historical resource (ICF International 2013). Various additional investigators have commented upon the past evaluations of the NWP Railroad Depot. It received a preliminary rating of "E" (ineligible for landmark status) in the 2019-2020 Downtown San Rafael Precise Plan Historic Resources Survey. Furthermore, San Rafael Heritage prepared a site record for the NWP Railroad Depot in 2020 that found the building eligible for listing in the CRHR under Criterion 1 (Events) (San Rafael Heritage 2020). In order to clarify the record regarding the historical resource status of the depot building, ICF has prepared an updated evaluation of this building for the San Rafael Transit Center Replacement Project Survey, which is included in Appendix F. In consideration of the record of past evaluations, ICF found the building not to be eligible for listing in the CRHR due to diminished integrity, and not to qualify as a CEOA historical resource.
- San Rafael Viaduct: The California Department of Transportation (Caltrans) State and Local Bridge Survey (1989 and updates) revealed that two bridges that cross through the project area were previously evaluated through the Caltrans historic bridge inventory and identified as Category 5 bridges (not eligible for listing in the NRHP). These bridges comprise the northbound and southbound structures of the San Rafael Viaduct (Caltrans Bridge Nos. 27 0035R and 27 0035L, respectively), which carries US-101 along the eastern edge of Downtown San Rafael. In addition to the Category 5 rating recorded in the Caltrans State and Local Bridge Survey, Caltrans evaluated the 1941-built northbound viaduct structure in 1999 for the Marin-101 High-Occupancy Vehicle Gap Closure Project and determined that it does not meet the definition of a historical resource under CEQA. The 1999 Caltrans evaluation assigned the northbound San Rafael Viaduct structure a CHRS code of 6Z (Caltrans 1999, 2018).

CNST-3 are presented below to reduce the level of the identified impact but would not be able to reduce impacts to a less-than-significant level.

# **Operations Impacts**

#### **All Build Alternatives**

Under all alternatives, operations of the San Rafael Transit Center would occur in the vicinity of historical resources near the eastern edge of Downtown San Rafael. Operations would not involve physical changes to any historical resources beyond those required for the construction of the four alternatives but would introduce new visual, audible, and atmospheric elements in the vicinity of those resources. Hypothetically speaking, circumstances could exist in which visual, audible, and atmospheric elements lead to the diminishment of a historical resource's integrity. For instance, it is possible that long-term, intermittent increases in noise and vibration resulting from the operations of a transportation facility might compel individuals to abandon a historical resource (such as a residence or commercial building). Such an act would constitute an indirect impact if it were to result in neglect of a resource's physical features that convey significance, which over time could diminish integrity of design, materials, workmanship, feeling, and association.

As described in Section 3.11, Noise, increases in operations-caused noise and vibration would not be substantive, and the intensity of transportation activities would not be substantially different from current conditions. As such, it is not anticipated that abandonment and neglect of historical resources would reasonably occur as an effect of project operation. Furthermore, no historical resources identified for the current investigation appear to rely upon a quiet setting to convey their significance. The negligible degree of change in the audible and atmospheric conditions of historical resources in Downtown San Rafael is not anticipated to diminish the historical integrity of any identified built-environment historical resource and would not constitute material impairment of its significance.

Therefore, operations of the proposed project would have *no impact* on built-environment historical resources under all four alternatives. No mitigation is required.

# **Mitigation Measures**

#### **MM-CULT-CNST-1: Prepare and Implement Relocation Plans**

The Golden Gate Bridge, Highway and Transportation District (District) shall retain a qualified historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations, Part 61) to prepare a relocation plan for any historical resource that the selected alternative could move in order to avoid demolition of the resource. The documentation shall be reviewed and approved by the District prior to the issuance of any demolition, site, or building permit for the resource proposed for relocation.

What about the city's input?

The relocation plan shall be reviewed and approved by the District and Planning Division to ensure that character-defining features of the buildings will be retained. This review shall occur prior to the commencement of any construction activities at the site. The relocation plan shall include required qualifications for the building relocation company to ensure that relocation is undertaken by a company that is experienced in moving historic buildings of a similar size and/or structural system as the subject buildings. The relocation plan shall ensure that the resource will be moved without irreparable damage to its character-defining historic fabric, and

# 9.2.24.1 Response to Comment Letter 24, Leslie Simons

#### Comment 24-1

A. Specific corrections: The mark-up has been edited to include only those pages affected in (-)

1. Page 1, 1st paragraph (p), 2nd sentence (s): "Some archaeological sites may also be considered tribal cultural resources." I have not noted many that are not fully tribal related, and "...Section 3.16" change to 3.15. SUGGESTION: It would be better to state clearly here that TCR related information is found in Chapter 3.15; then all information relating to TCR will be found in that chapter and not repeated here. (See Section D below)

#### **Response to Comment 24-1**

The commenter provides a series of comments regarding information and analysis contained in Section 3.4, Cultural Resources. The following are responses to these comments.

Many archaeological sites are historical and are not tribal cultural resources; therefore, archaeological information is included in this section. Not all tribal cultural resources are archaeological, so a separate discussion is necessary for that section. The section number reference has been corrected in the Final EIR.

#### Comment 24-2

2. Page 9 (2), 1st p, 4th s: "... (both outside the project area) ..." The potentially eligible "East Downtown Core" historic district now includes both sides of Tamalpais between 3rd and 4th.

#### **Response to Comment 24-2**

The existing conditions and environmental impacts discussions in Section 3.4 have been revised to reflect that the boundary of the East Downtown Core Historic District now extends into the CEQA study area for the project and contains buildings that would be altered by the project. Please refer to the response to comment 5-34 regarding additional analysis that addresses potential impacts on the East Downtown Core Historic District.

### Comment 24-3

3. Page 9 (2), end of 3rd p: "Appendix G." This is seriously misleading, as this appendix is "confidential" why refer to it as "available in ..." – there is nothing there and is again referenced on page 28

#### Response to Comment 24-3

References to Appendix G, which was redacted for confidentiality, have been removed from Section 3.4 in the Final EIR.

#### Comment 24-4

4. Page 12 (3), 1st p: "Mission San Rafael Archangel ... near downtown San Rafael in 1917." The "Asistencia San Rafael Archangel" was established in 1817 (it became a mission in 1822). Then, about 55 years later, the Marin County Courthouse was built on mission lands. 'A' Street is the center of town historically and currently. Please rephrase similar to "...what was to become the heart of San Rafael's downtown in 1817".

#### **Response to Comment 24-4**

Thank you for these comments on the historic context, which reflected information available in secondary sources. The discussion of railroads and San Rafael's growth has been revised based on the information provided in the comment and additional research to improve its accuracy. However, the historic context does not affect the sufficiency of the analysis of environmental impacts presented in Section 3.4.

#### Comment 24-5

5. Page 13 (4), 1st p: This is very confusing and consists of seriously inaccurate information. As the information is credited perhaps this is an example of the difficulty in dispelling printed information.

The North Pacific Coast (NPC) Railroad was established in 1871 but had nothing to do with the construction of the Union Station nor did the Aitchison Topeka & Santa Fe (SF). In an online review there is no mention of the SF being active in the development of rail lines in this area during the 1880s. Please clarify how this information was established or strike/rewrite "The North Pacific Coast RR was established in 1874" and "In 1884, the Santa Fe and North Pacific Railroad built ..."

The North Shore was the line that invented the "Electrics" It was very short lived and was primarily a commuter line as will be noted below, Item A.8.

The Union Station was constructed by the San Francisco & North Pacific Railroad (est. 1877) in 1884 after completion of the Puerto Suello tunnel a few years earlier when the site on Tamalpais Avenue was selected for the passenger station. Peter Donahue was one of many "railroad barons"; I understand that he was instrumental in strong-arming other smaller railroad developers out of business. (See ownership flow chart page 14 & 15 in "The Northwestern Pacific Railroad – Lifeline of the Redwood Empire, Boom and Bust 1951-2001", Angelo Figone, NWPRR Historical Society, 2017)

### **Response to Comment 24-5**

Please refer to the response to comment 24-4.

#### Comment 24-6

6. Page 13, 2nd p, 1st s: This is a simplistic and therefore incorrect statement. The NPC became part of the North Shore in 1902. The San Rafael & San Quentin was another of the 10 railroad companies that were consolidated by the Santa Fe (SF) and Southern Pacific (SP) in 1907. (See flow chart noted in A.5)

#### **Response to Comment 24-6**

Please refer to the response to comment 24-4.

#### Comment 24-7

7. Page 13, end of 2nd p: It was the consolidated NWP (both SP and SF) that built several stations along the route. The dissolution of the NWP occurred 2 weeks before the 1929 San Rafael Depot opened.

# **Response to Comment 24-7**

Please refer to the response to comment 24-4.

#### Comment 24-8

8. Page 13, end of 3rd p: "Commuter rail service in Marin County, the electrics, was discontinued ...". This is a common and confusing statement as passenger service continued until the late 1950s.

# **Response to Comment 24-8**

Please refer to the response to comment 24-4.

#### Comment 24-9

9. Page 14 (5), 3rd p, 2nd s: "The San Rafael depot closed in 1974, when local freight service was discontinued..." NWP became part of SP, this area being operated by the headquarters in San Francisco. In San Rafael freight service continued into the early 1990s.

#### **Response to Comment 24-9**

Please refer to the response to comment 24-4.

#### **Comment 24-10**

10. Page 20 (6), "Historic Map Review" 2nd p, 4th s: Incorrect reference – See item A.5.

#### **Response to Comment 24-10**

A revision has been made in the Final EIR (see page 3.4-22) to include the correct reference and date for the railroad arriving in San Rafael.

### Comment 24-11

11. Page 21 (7), last p: The final DTPP identified only two potential historic districts. Next sentence "None of the resources in the CEQA study area is among the locally listed resources." Both 927 and 930 Tamalpais are on the 1978 and 2020 inventories; does this statement refer to the local landmark register?

#### **Response to Comment 24-11**

The commenter is correct that the reference to "locally listed" means the local register of historical resources rather than evaluated in local historical resource surveys. This sentence has been revised for clarity on page 3.4-23 of the Final EIR but does not affect the adequacy or conclusions of the EIR analysis.

#### **Comment 24-12**

12. Page 22 (8), 2nd p: "(Neither of these eligible districts overlaps with the CEQA study area.) This statement is out of date as both 927 and 930 Tamalpais are within the "East Downtown Core" eligible districts. Just below, "E: Ineligible as local landmarks" has since been eliminated as a rating. As the GP 2040 and the DTPP have already been accepted by the City Council before this DEIR for the SRTC was published; why does this EIR relate most often to the out-of-date GP 2020.

#### **Response to Comment 24-12**

Please refer to the response to comment 5-34 regarding revisions to the Final EIR to consider potential impacts on the East Downtown Core Historic District. Furthermore, the letter ratings proposed in the *Downtown San Rafael Precise Plan Historic Resources Survey* have been updated throughout Section 3.4 to correspond to the ratings reported in the May 2021 final *Downtown San Rafael Precise Plan Historic Resources Survey* report; the regulatory setting section has also been revised to remove discussion of *The City of San Rafael General Plan 2020*.

#### **Comment 24-13**

13. Page 22, 4th p: Why does the residence at 1011 Irwin receive a "B" rating? The only reason I can imagine is, should the "Under the Freeway" alternate be chosen, it would place it "in the way", making removal/demolition more difficult and greatly more expensive with the mitigation measures required. It is a rather common residence found in many neighborhoods in the city. It has no known history and an obviously out of character brick entry staircase unrelated to its date of construction. To be clear, I do take issue with several of the 2020 historic resource nominations and omissions.

#### **Response to Comment 24-13**

Please refer to the response to comment 9-6 regarding the historical resource status of 1011 Irwin Street.

#### **Comment 24-14**

14. Page 23 (9), 2nd p, 1st s: Address error - 730 - correct to 930 Tamalpais.

#### **Response to Comment 24-14**

A revision has been made on page 3.4-26 of the Final EIR to reference the correct street address of the Whistlestop building as noted in the comment.

### Comment 24-15

15. Page 23, 2nd p, 3rd s and on: It is my opinion that the 2012 JRP evaluation was expressly written to demolish the NWP Depot. I also suspect it was written by underqualified persons as it is very poorly composed, bouncing back and forth around the building like a ping-pong ball. This appears intentional, to make the elements as described difficult to track. A couple of examples include:

a. Sheet 523A, Page 1 of 17 - "All of the arched parapets on the building are replacements ..." This is inaccurate, 3 appear to be original 1929 raised "shaped Mission parapets" (SMP); even if they were replacements, they are identical to and located in historically accurate positions. A fourth SMP from the mid-1940s NWPRR headquarters addition was also built during the railroads period of ownership; considered the buildings "Period of Significance".

The 2012 evaluation totally ignores anything since the set point of 1929. Even the National Park Service recognizes that buildings change over time depending on the needs of the occupants/owners. The locations of the 1929/1945 SMPs are illustrated on the attached plan "Order of Development – Floor Area Estimate", dated October 5, 2021.

b. Sheet 523A, Page 3 of 17, 2nd paragraph, 5th sentence: "The arches are mostly filled with metal entry doors, and eight-over-eight metal hopper windows." Again, the evaluators did not appear to have

architectural training as the reference to "hopper windows" is incorrect. Hoppers open to the interior and swing in from a bottom hinge. Here the original windows are awning windows which open out and are hinged from the top.

c. In 2015 an earlier architectural historian reviewed the 2012 JRP Evaluation and found "that the JRP evaluation is flawed and its conclusions are not substantiated ... They merely conclude that there is a loss, without establishing a factual basis and doing an analysis ... The building still conveys its historic significance as a railroad station". (Richard Brandi, San Francisco)

Here again the DEIR refers to an out of date rating for the depot building which was upgraded to a "C". I do not give much credence to the new ICF DPR 523 mentioned later; once again, 927 and 930 Tamalpais complicate the Districts preferred alternative. Historically the depot should be given an "A" (even with the later additions which could be removed) and the taxi office at a minimum a "B" as contributory.

# **Response to Comment 24-15**

Please refer to the response to comment 9-8 regarding the 2012 JRP evaluation of the Whistlestop building. ICF's updated DPR form provides a discussion of the earlier JRP evaluation and presents a new analysis of significance and integrity that supports the analysis in the EIR. The comment does not provide new information that was not previously considered in the EIR, and no associated revisions are necessary. Furthermore, Section 3.4 has been updated to reflect the survey ratings presented in the revised May 2021 summary report for the *Downtown San Rafael Precise Plan Historic Resources Survey*.

### **Comment 24-16**

16. Page 23, 2nd p, 6th s: Why is the SRH 2020 DPR 523 dated January 8, 2020 referred to merely as a "site record". It is my understanding that if accompanied by a cover letter written by an officially listed architectural historian the document would carry the same weight as one officially signed by one.

The evaluator (the undersigned), although not trained in the field, has been actively involved in San Rafael's historic resources since the late 1970s. While compiling the above referenced document, I was extensively (and repeatedly) schooled by a listed architectural historian to bring this DPR into conformance with the standards required for official State documentation. Diana Painter, of Painter Preservation, noted in her April 2020 cover letter "There is no question of the importance of this building and site to San Rafael and the region's history ... it is undoubtedly significant for its design ... The fact that few original stations remain increases the importance of this building".

#### **Response to Comment 24-16**

The use of the term "site record" is intended to be synonymous with "DPR form set" and has been revised. This comment does not provide new information that would require further revisions to the analysis contained in Section 3.4.

#### **Comment 24-17**

17. Page 32 (10), 2nd p below "Mitigation Measures": The statement that "... shall be reviewed and approved by the District and Planning Division to ensure ..." It is my understanding that the City of San Rafael and City Council has the final say on what will be happening on their city streets. In the "Memorandum of Understanding" Item 4 outlines the cooperative relationship between partners. Item

5 states "The parties agree that the selected alternative must be approved by the City Council". This cooperation is not mentioned anywhere that I can locate.

# **Response to Comment 24-17**

Please see the response to comment 5-8 for additional information about the MOU between the District and the City. Once the District approves a project and certifies the EIR, it will bring the approved project/selected alternative to the City Council for its approval.

#### Comment 24-18

#### B. General comments:

1. "ICF International" and "ICF" occur variously until becoming simply "ICF" finally on Page 23. This should have started when first mentioned at the beginning of the chapter and followed through thereafter.

#### **Response to Comment 24-18**

The comment concerns inconsistency in references to ICF. The references to ICF International and ICF are for the same firm before and after a corporate name change. No revisions to the Draft EIR are required.

#### **Comment 24-19**

2. The total disregard for the development of San Rafael (and other towns and cities in Marin) as a "railroad suburb" of San Francisco is why I believe the repeated undervaluation of the NWP Depot occurs. The depot is the most prominent, extant example of this historically important event for San Rafael. No matter what basis is used the fact that throughout the documents the depot and taxi office are pushed aside as "not eligible" is a faulty conclusion. It seems as if the buildings are "in the way" so therefore not to be considered important or require mitigation measures. There is a short reference to the arrival of the railroad on page 12 but nothing else. This sweep-under-the-carpet occurs often on later pages, especially under 3.4.2.3 (Page 28 to 34) so I do not repeat my concerns.

#### **Response to Comment 24-19**

This comment expresses concern regarding the EIR's finding that the buildings at 927 Tamalpais Avenue and 930 Tamalpais Avenue are not eligible for historic register listing and therefore do not qualify as CEQA historical resources. The evaluations documented on the DPR forms in Appendix F of the Draft EIR (Appendix H of the Final EIR) provide further details as to the reasons the buildings do not meet the eligibility requirements of the National Register of Historic Places and California Register of Historical Resources. The evaluation of the former depot building at 930 Tamalpais Avenue is in agreement with the commenter that the railroad history of San Rafael justifies the building's significance; however, the evaluation also includes a detailed assessment of integrity that establishes the building does not have sufficient integrity to meet eligibility requirements. As documented in Section 3.4, Cultural Resources, the identification of historical resources is based upon substantial evidence composed of past documentation, historical research, and sound analysis; the proposed project has not influenced the resource identification process.

#### Comment 24-20

3. I do not have a problem with the District maintaining their services in the structure but this should be done only with careful restoration/rehabilitation using the Secretary of the Interiors Standards to raise the building's qualification for state and/or national listing. Local historic register listing should be the primary focus. Landmark status can be established locally by any agency whether or not the building qualifies for national or state status.

#### **Response to Comment 24-20**

The commenter expresses support for the rehabilitation and local historic register designation of the Whistlestop building, which is noted. Regarding the project's effects on 930 Tamalpais's national or state designation status, the updated evaluation completed by ICF documents that the resource has diminished integrity and therefore is not eligible for listing in federal and state historical resource registers. Furthermore, the building has not previously been listed in the local historical resource register. Note that because the Whistlestop building does not currently qualify as a historical resource individually, there is no significant impact on the building. This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are necessary.

#### Comment 24-21

C. Preferred Alternatives:

1. It should be noted that the undersigned is very against any proposed alternative that would modify Tamalpais Avenue in any way. Yes, it is funky, that is why it is classically "historic". The National Hotel at 703-705 Fourth Street could be restored to receive a rating as it is a candidate for the use of incentives.

#### **Response to Comment 24-21**

The comment expresses opposition to the Move Whistlestop and Adapt Whistlestop Alternatives and supports the restoration of the National Hotel building. The existing evaluation of the National Hotel as not eligible for historic register listing, and therefore not qualifying as a historical resource, considers the building's current physical condition and integrity; anticipating a potential future condition and potential future historical resource status would be speculative and not supported by evidence. No revisions to the Draft EIR are necessary.

#### **Comment 24-22**

2. Under the Freeway Alternative: Of those proposed, this citizen supports this alternative. Mentioned variously as dark, cold, uninviting and lacking in security this could easily be mitigated to become a bright, inviting space. An example would be the pedestrian tunnel connecting terminals at Chicago's O'Hare Airport. It runs below airplane taxiways but with the use of varying lighting techniques and soothing sounds the space becomes an exciting environment oblivious to the hazards above. Here in San Rafael, the need to create covered space is reduced because of the presence of the viaducts of the 101 overpasses.

### **Response to Comment 24-22**

The comment expresses support for the Under the Freeway Alternative. The comment does not pertain to the adequacy of the EIR and no further response is required.

#### Comment 24-23

3. A Preferred Option: Retain the Bettini Transit Center east of the SMART tracks: Probably the least expensive option would be to add a pedestrian bridge to link the Citibank parcel. This would also have the least detrimental effect on the historic resources in the station area and be cost effective. I understand that the sale of this parcel is expected to help pay for the new transit center development, but with less alterations needed, the required funds would be less if this suggestion were to be accepted.

# **Response to Comment 24-23**

As discussed in Chapter 5, Section 5.4.5, Alternatives Considered but Eliminated from Further Analysis, of the Final EIR, numerous alternatives were considered throughout the development of the proposed project, including alternatives that explored different project sites. The reasons for dismissal of these alternatives from detailed analysis in the EIR are described in Section 5.4.5.

Similar to the Two-Story Concept in Section 5.4.5.1, retaining the existing transit center and installing a pedestrian bridge over Tamalpais Avenue would pose accessibility issues for transit users with disabilities and would conflict with the project objective to "provide a transit facility that is readily accessible to individuals with disabilities, transit users, and transit-dependent populations, including those with low incomes."

#### Comment 24-24

4. Even if the parcel mentioned in B.4 were to be sold the very useful bus bays between 2nd and 3rd on Hetherton should be part of that future developments program.

#### **Response to Comment 24-24**

The comment express interest in having bus bays between 2nd Street and 3rd Street at the existing transit center retained in future development of the existing transit center location. Retaining these bus bays would affect the development potential of the existing transit center site and conflict with the MOU between the District and SMART, which states that the District will use the proceeds from the sale of the site to assist in funding the proposed project. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### **Comment 24-25**

D. Preliminary discussion on the separation of information between Chapters 3.4 and 3.15:

It is difficult to fully critique the two chapters in this correspondence. The most comprehensive and very complicated are concerns that relate to elements repeated in both or in other cases seeming misplaced in one or the other chapter. This results in mind-numbing repetition and an overuse of paper when published in hard copy. I will attempt to suggest how this may relate to both chapters under separate cover.

Chapter 3.4 – Cultural Resources: This chapter should handle the "built environment resources" relating to the changes that occurred with and after the arrival of the Franciscan missionaries and the soon to occur influx of mostly European settlers. The information on "Prehistory" should not be in this chapter, it could be cross-referenced to the "Tribal Cultural Resources" (TCR); it does not relate as non-natives were not here. As stated in the intro of this letter, this chapter should start with a statement that directs the reader to the TCR which would result in an overall simplification of both.

Chapter 3.15 – Tribal Cultural Resources: should include all "archaeological resources" and elements relating to prehistory up to and including the impact the arrival of the missionaries had on the Native American people.

What happened to the native population? They could no longer live the life of hunter/gatherer/stewards as the loss of their ability to wander by the season was halted. This occurred first by the subjugation of many for the mission system, later their former lands were divided into rancheros then, with the influx of settlers, their thousands of years of freedom ended.

In the mission system much of the native population was enslaved very similarly to the African population in the east and south of this country. Here, if a neophyte was unhappy with his lot and took off, he or she would be found, brought back and beaten into submission. With the creation of the State of California the native population was not allowed citizenship; few if any rights or attendance in institutions of learning was allowed.

# **Response to Comment 24-25**

The comment expresses concern about redundancies in Section 3.4, Cultural Resources, and Section 3.15, Tribal Cultural Resources, and suggests moving information between the sections to avoid this. While some resources are considered cultural resources and tribal cultural resources, there are important areas that do not overlap, including historical archaeological sites and non-archaeological tribal cultural resources. Because of this, a resource may pertain to one section but not the other and it is necessary to include a full discussion in both sections. Section 3.4 includes both built environment and archaeological resources. No revisions to the Draft EIR are necessary.

#### **Comment 24-26**

In conclusion, I have only concentrated on my areas of interest in the DEIR. There is general approval of the adaptive reuse of the depot. Its importance to the development of San Rafael seems to be lost on the teams hired by the District and others. I honestly feel they do not want this building to be significant because it would be inconvenient. I prefer to see the buildings on the west side of Tamalpais remain intact and request the District stay clear of the depot and any alterations to West Tamalpais Avenue.

As a landscape architect I have done site measurements multiple times over the decades of my career. The attached plan was first generated for the NWP Depot Landmark Application mentioned in Item A.16. The plan is to scale with the exterior walls accurately depicted and includes estimates of square footage for the entire existing building. Hope this is of use to the planning team.

I will send suggestions for reorganizing Chapters 3.4 and 3.15 under separate cover. A mark-up of Chapter 3.4 is also attached with the illustrated comments in orange. Other markings relate to the repetitive nature of many areas that belong in Chapter 3.15. Thank you for taking this letter into consideration as you proceed with finalization of the project Environmental Impact Report.

#### **Response to Comment 24-26**

The comment expresses concern about potential impacts on the building at 930 Tamalpais and references attachments to the comment letter that contain information about the building. As described in Section 3.4, Cultural Resources, the updated evaluation completed by ICF documents that the building has diminished integrity and therefore is not eligible for listing in federal and state historical resource registers. Furthermore, the building has not previously been listed in the local historical resource register. Please see the response to comment 5-34 for a discussion of this

building in the context of its status as a potential contributor to the proposed East Downtown Core Historic District.

----Original Message----

From: Philip Mooney <philipmooney@icloud.com>

Sent: Thursday, October 7, 2021 7:56 AM To: SRTC <SRTC@goldengate.org>

Subject: Comment on draft EIR of San Rafael Transit Center

Hi SRTC folks

I'm writing to give public comment about the proposed alternative for the San Rafael Transit center. Generally, I like the design elements that account for all users. It provides thoughtful connections for bicycles, pedestrians, SMART, and the buses. As someone who minimizes the use of vehicles, I regularly use all of these forms of transit.

One glaring issue is the pick up/drop off area on the north side of the center, and the incompatibility of this design with the bike route that needs to go along Tamalpais Ave. Cars pulling in and out with their doors swinging open is dangerous for all in this area, which is the only reasonable (the path along Heatherton is not at all a sufficient alternative) bike throughfare that enables connection between 4th st and the Lincoln path to the north. This is an incredibly important bike way for N-S connectivity through the city.

The current location of the drop off area also encourages cars to turn onto 4th st, which is the pedestrian priority access point. I hope for a design that would discourage cars from making this turn. Perhaps this drop off area can be relocated somewhere on Heatherton, 2nd, or 3rd. These are areas that are already prioritized for cars.

Thank you Philip Mooney Resident of San Rafael and member of the San Rafael BPAC

Sent from my iPad

25-1

# 9.2.25.1 Response to Comment Letter 25, Philip Mooney

#### Comment 25-1

One glaring issue is the pick up/drop off area on the north side of the center, and the incompatibility of this design with the bike route that needs to go along Tamalpais Ave. Cars pulling in and out with their doors swinging open is dangerous for all in this area, which is the only reasonable (the path along Heatherton is not at all a sufficient alternative) bike throughfare that enables connection between 4th st and the Lincoln path to the north. This is an incredibly important bike way for N-S connectivity through the city.

The current location of the drop off area also encourages cars to turn onto 4th st, which is the pedestrian priority access point. I hope for a design that would discourage cars from making this turn. Perhaps this drop off area can be relocated somewhere on Heatherton, 2nd, or 3rd. These are areas that are already prioritized for cars.

#### **Response to Comment 25-1**

The comment concerns the location of the pick-up/drop-off area. Please see the response to comment 7-3 regarding the modified pick-up/drop-off area located on a new driveway west of West Tamalpais Avenue, between 3rd Street and 4th Street.

From: Fred Grange

To: <a href="mailto:city.clerk@cityofsanrafael.org">city.clerk@cityofsanrafael.org</a>; Raymond Santiago; Maribeth Bushey (maribeth.bushey@cityofsanrafael.org); Kate

Colin (kate.colin@cityofsanrafael.org); bill.guerin@cityofsanrafael.org; DJ.Allison@aecom.com;

allison.Judice@cityofsanrafael.org; linzyk@sbcglobal.net; alikover@aol.com; rafat.raie@cityofsanrafael.org;

<u>Jim.Schutz@cityofsanrafael.org</u>; <u>William Carney (williamcarney@comcast.net)</u>

Cc: Stephanie Plante (splante@cpidevelopers.com); Joanne Webster (jwebster@srchamber.com); Joe & Joan Lemon

(Joslemon@aol.com)

Subject: San Rafael officials fault study on transit hub move

**Date:** Monday, October 11, 2021 2:49:54 PM

# Raymond Santiago,

Project Manager, San Rafael Transit Center Golden Gate Bridge Highway and Transportation District <u>Via Email</u> 1011 Anderson Blvd, San Rafael, Calif. 94901

# rsantiago@goldengate.org

RE: San Rafael Transit Center Environment Impact Report Public Comment Raymond:

I read in todays IJ that there will be a meeting tonight about the transit center. Later in the article it stated:

"It is an inadequate and unsafe design that could potentially jeopardize pedestrian and vehicular safety," they added.

They also questioned why the report contained limited discussion about sea level rise, and they want the district to add an assessment of projected water levels and risks.

The officials submitted their memorandum as part of a City Council session on the issue on Monday. The council voted to send a letter to the bridge district outlining the perceived deficiencies in the report."

https://www.marinij.com/2021/10/09/san-rafael-officials-fault-study-on-transit-hub-move/?

campaign=goodmorningmarin&utm\_email=14A66562F4F504A4D490542795 &g2i\_eui=JgJEl%2fC%2fYQTSDsQjyDRnnyFTjcWPhyec&g2i\_source=newslette r&utm\_source=listrak&utm\_medium=email&utm\_term=https%3a%2f%2fw ww.marinij.com%2f2021%2f10%2f09%2fsan-rafael-officials-fault-study-on-transit-hub-move%2f&utm\_campaign=bang-nl-good-morning-marin-nl&utm\_content=automated

Depending on the height of the tide, East San Rafael is many feet below sea level now and will get deeper over the years.

26-1

26-1 cont. There are only three ways to prepare for it now:

- 1. Levee repair, upgrade and maintenance.
- 2. Pump station repair, upgrade and maintenance.
- 3. Channel dredging, maintain adequate depths for drainage.

Costs and timing are the only variables since they depend on when and how?

For example, the major cost associated with the levee reinforcement is the cost of material.

The major cost of dredging is the transportation and disposal of dredged material that can be beneficially reused.

Millions can be saved if we simply reuse the dredged material to protect the levees like what is planned at Tiscornia by Barbra Salzman.

Decades age I led the effort to do the above. We built a pond where the Spinnaker / Baypoint homes are now.

We dredged the San Rafael Canal and beneficially reused the material. The developer built all those homes on it.

Everyone won. The Canal was dredged and levees built efficiently at lower cost utilizing a hydraulic dredge.

The material was quietly moved to raise the site via pipeline instead of hauling it in thousands of dump truck loads.

Please call me if you would like to learn more about how we can accomplish another win-win for all involved.

**Fred Grange** 

**Francisco Properties** 

Grange Debris Box and Wrecking Co., Inc.

200 Tamal Plaza Suite 115

Corte Madera, Calif. 94925

P:415-456-2712, m:415-302-5537

E-mail: Fred@GrangeBox.Com

Web: www.GrangeBox.Com

# 9.2.26.1 Response to Comment Letter 26, Fred Grange

#### Comment 26-1

I read in todays IJ that there will be a meeting tonight about the transit center. Later in the article it stated:

"It is an inadequate and unsafe design that could potentially jeopardize pedestrian and vehicular safety," they added.

They also questioned why the report contained limited discussion about sea level rise, and they want the district to add an assessment of projected water levels and risks.

The officials submitted their memorandum as part of a City Council session on the issue on Monday. The council voted to send a letter to the bridge district outlining the perceived deficiencies in the report."

https://www.marinij.com/2021/10/09/san-rafael-officials-fault-study-ontransit-hub-move/?campaign=goodmorningmarin&utm\_email=14A66562F4F504A4D490542795&g2i\_eui=JgJEI%2fC%2fYQTSDsQjyDRnnyFTjcWPhyec&g2i\_source=newsletter&utm\_source=listrak&utm\_medium=email&utm\_term=https%3a%2f%2fwww.marinij.com%2f2021%2f10%2f09%2fsan-rafael-officials-fault-study-ontransit-hub-move%2f&utm\_campaign=bang-nl-good-morning-marinnl&utm\_content=automated

Depending on the height of the tide, East San Rafael is many feet below sea level now and will get deeper over the years.

There are only three ways to prepare for it now:

- 1. Levee repair, upgrade and maintenance.
- 2. Pump station repair, upgrade and maintenance.
- 3. Channel dredging, maintain adequate depths for drainage.

Costs and timing are the only variables since they depend on when and how?

For example, the major cost associated with the levee reinforcement is the cost of material.

The major cost of dredging is the transportation and disposal of dredged material that can be beneficially reused.

Millions can be saved if we simply reuse the dredged material to protect the levees like what is planned at Tiscornia by Barbra Salzman.

Decades age I led the effort to do the above. We built a pond where the Spinnaker / Baypoint homes are now.

We dredged the San Rafael Canal and beneficially reused the material. The developer built all those homes on it.

Everyone won. The Canal was dredged and levees built efficiently at lower cost utilizing a hydraulic dredge.

The material was quietly moved to raise the site via pipeline instead of hauling it in thousands of dump truck loads.

Please call me if you would like to learn more about how we can accomplish another win-win for all involved.

# Response to Comment 26-1

The comment concerns the potential impacts of sea level rise on the transit center and provides recommendations regarding potential measures to address sea level rise. Section 3.9, Hydrology and Water Quality, discusses the susceptibility of each alternative site to sea level rise. The Final EIR includes *San Rafael General Plan 2040* policies relevant to sea level rise, with which the proposed project will comply, as necessary (see pages 3.9-7 and 3.9-8 of the Final EIR). The actions suggested by the commenter, which include levee and pump station improvements and dredging, are outside of the scope of the proposed project. Please see the response to comment 5-42 for additional information on sea level rise.

# 9.2.27 Comments from Public Meeting

# 9.2.27.1 Response to Comments from Public Meeting 1 (September 14, 2021)

#### Comment 27-1

Is new New Customer Service Building different from the Relocated Whistlestop Building? Where would the Whistlestop Building be relocated to?

#### Response to Comment 27-1

As discussed in Chapter 2, Section 2.5.2, Project Characteristics, Circulation, and Pick-Up/Drop-Off, the Whistlestop building would be relocated to the west side of Tamalpais Avenue or a new building would be constructed at that location. The customer service building would either be the relocated Whistlestop building or the new structure. There has been no consideration to relocate the Whistlestop building to any other location.

### Comment 27-2

If the (terrible and unpopular) Under the Freeway Alternative is not selected, would there be better lighting, walkways, and signage / wayfinding between the new SRTC and the Caltrans Park and Ride Lot under the freeway?

#### **Response to Comment 27-2**

The comment expresses concern with lighting, walkways, and signage between the new transit center and the existing Caltrans park-and-ride lot. Improvements to lighting, walkways, and signage/wayfinding at the new transit center site and along its perimeter are included in the project description for all build alternatives. Should the Under the Freeway Alternative not be selected, the project boundary would not extend east of Hetherton Street, and the City would be responsible for lighting, pedestrian walkways, and signage and wayfinding upgrades beyond the project perimeter. The District would support any City-led improvements to enhance transit access in the vicinity of the San Rafael Transit Center.

# Comment 27-3

The Community Design Advisory Group should include participation from Amalgamated Transit Union Local 1575.

#### **Response to Comment 27-3**

The comment suggests that the Amalgamated Transit Union Local 1575 should be included in the community design advisory process. The project team will consider this group in the determination of Community Design Advisory Group members.

#### Comment 27-4

Can you describe the active transportation connections to and through the site of the preferred alternative? Ped and bike access to and through the transit center is crucial.

#### **Response to Comment 27-4**

The Move Whistlestop Alternative (preferred alternative) layout is introduced in Chapter 2, Section 2.5, Preferred Alternative: Move Whistlestop. Figure 2-4 shows the project layout and indicates where the Move Whistlestop Alternative would include pedestrian and bicycle facilities. Additionally, Section 3.13, Public Services and Recreation, describes the existing and planned bicycle network near the project site, and Section 3.14, Transportation, describes the existing transportation network (including pedestrian and bicycle facilities) and analyzes potential conflicts between the proposed project and programs, plans, ordinances, or policies addressing the circulation system, including bicycle and pedestrian facilities. The bicycle and pedestrian network is also further discussed in the *Transportation Summary Report* (Appendix E to the Final EIR).

#### Comment 27-5

I noticed that in the resources that were included for analysis it did not include any economic impact to the downtown corridor; that is the impact of future development. Will you be adding an analysis of potential for the development of future parcels?

#### **Response to Comment 27-5**

The comment concerns the economic impacts of the proposed project on Downtown San Rafael. CEQA does not require analysis of economic impacts, so the potential future development of parcels near the proposed project is not required to be included in the EIR.

#### Comment 27-6

How will the Move Whistlestop Alternative accommodate the future extension of the North South Greenway multi use path along West Tamalpais Avenue between Fourth Street and Mission Avenue? The Move Whistlestop Alternative currently shows a "pick up/drop off zone" along the east side of West Tamalpais Avenue, but this appears to be in conflict with the future Greenway.

#### **Response to Comment 27-6**

Please see the responses to comments 7-3 and 7-4. The Move Whistlestop Alternative and Adapt Whistlestop Alternative would construct a portion of the City's planned Class IV bicycle facility (the greenway multi-use path) on Tamalpais Avenue between 2nd Street and 4th Street. The Move Whistlestop Alternative layout has been revised to move the pick-up/drop-off area to a new driveway west of West Tamalpais Avenue, between 3rd Street and 4th Street. Consequently, the project would not have any conflict with the planned North South Greenway north of 4th Street.

#### Comment 27-7

For the Move Whistlestop Alternative, what is the preferred path of travel for bicyclists traveling north on Tamalpais past 4th Street? There is no east/west bicycle connection between Tamalpais and the Hetherton pathway, and the draft plan proposes pick-up and drop-off area on Tamalpais north of 4th St, a use that is not compatible with low-stress bicycle travel.

#### **Response to Comment 27-7**

Planned bicycle infrastructure is described in Section 3.13, Public Services and Recreation. Proposed bicycle path projects in the project area include a project that would install a Class IV bikeway along

West Tamalpais Avenue between 2nd and 4th Streets, including a crossing of 4th Street. The Move Whistlestop Alternative and Adapt Whistlestop Alternative would construct a portion of the City's planned Class IV bicycle facility (the greenway multi-use path) on Tamalpais Avenue between 2nd Street and 4th Street. Please see the response to comment 7-3 regarding the revised pick-up/drop off location. North of 4th Street, the project would not be in conflict with the City's plan for a North South Greenway extending to Mission Avenue. This area lies outside of the project footprint and would not be modified by the project.

#### Comment 27-8

What are the specs to the Alter Whistlestop option?

#### **Response to Comment 27-8**

Chapter 2, Section 2.6.2, Adapt Whistlestop Alternative, describes the site layout, project features, circulation, pick-up/drop-off areas, and utilities required for the Adapt Whistlestop Alternative.

#### Comment 27-9

The North South Greenway is a Class I Multi Use Path, NOT "Sharrows" (Class III route) as Adam just described.

#### **Response to Comment 27-9**

The planned segment of the North South Greenway that runs along West Tamalpais Avenue and that would be constructed as a part of the Move Whistlestop and Adapt Whistlestop Alternatives is a Class IV bike facility. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### **Comment 27-10**

Follow-up on the New Customer Service / Whistlestop Building: With the Move Alternative, can functional and historic portions of the building be saved and relocated without compromising architectural features and still maintain meeting, office, open waiting room, and other building uses?

#### **Response to Comment 27-10**

Under the Move Whistlestop Alternative, the Whistlestop building would be relocated to the west side of West Tamalpais Avenue between 3rd and 4th Streets, or a new building would be constructed utilizing similar façades or architectural elements from structures currently on the Whistlestop site. Details regarding the portion of the Whistlestop building that can be relocated and reused for transit purposes are not yet determined.

#### **Comment 27-11**

As to future building use, with a bigger building you might have Marin Transit offices there as well as Golden Gate customer service staff, for example.

#### **Response to Comment 27-11**

The comment pertains to potential uses for a new transit center administrative building. This is not a comment on the adequacy of the EIR. No revisions to the Draft EIR are required.

#### **Comment 27-12**

The Move Whistlestop Alternative assumes that the buildings and land uses (such as parking lots) that currently face the west side of Tamalpais Ave between 3rd and 4th Streets will be transformed. Does the City/Golden Gate Transit plan to purchase those properties from their current owners? Or would this be a case of eminent domain?

#### **Response to Comment 27-12**

The comment concerns the planned acquisition of parcels on Tamalpais Avenue between 3rd Street and 4th Street. The EIR's analysis assumes that these parcels would be acquired to facilitate project implementation. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

### **Comment 27-13**

With the Move It Alternative, would local buses from San Anselmo that don't need to cross the tracks stay on the west side (same idea on east side only trips), so as to minimize the number of crossings of the tracks?

#### **Response to Comment 27-13**

It is anticipated that bus bays west of the SMART tracks along West Tamalpais Avenue would be used by routes traveling to/from the west of Downtown San Rafael in order to allow them to avoid having to cross the rail tracks, as noted by the commenter. Specific bus bay assignments will be developed based on the service in operation at the time of project opening. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

#### **Comment 27-14**

Thanks for taking and responding to the questions here. It would be nice to see the names of the other participants tonight, but other than that, this is a civil, fair, and good process.

#### Response to Comment 27-14

The comment provides feedback on the public meeting process. This is not a comment on the adequacy of the EIR and no further response is required.

#### **Comment 27-15**

What involvement does the City of San Rafael Council have with approving the final alternative?

#### **Response to Comment 27-15**

For the purpose of the CEQA analysis, the City does not need to approve the preferred alternative. Once the District approves a project and certifies the EIR, it will bring the approved project/selected alternative to the City Council for its approval.

#### **Comment 27-16**

Fourth street is a priority pedestrian and bicycle street. I love the move Whistlestop one. However West Tamalpais is THE NORTH SOUTH GREENWAY for biking and walking and is critical to keep priority

biking and walking. So please, DO NOT site cars and taxis drop offs pick ups on West Tamalpais north of Fourth because it will induce demand for car use on both Fourh St and West Tamalpais which we need to have very low car use. Please put drop offs by cars on Heatherton between Fifth and Fourth.

#### Response to Comment 27-16

The comment concerns the placement of pick-up/drop-off areas included in the Move Whistlestop and Adapt Whistlestop Alternatives relative to bicycle facilities. Please refer to the response to comment 7-3 for additional detail on the pick-up and drop-off area. The Move Whistlestop Alternative layout has been revised to move the pick-up/drop-off area to a new driveway to the west of West Tamalpais Avenue, between 3rd Street and 4th Street.

#### **Comment 27-17**

Would southbound Route 70 and 101 buses stay on Hetherton and use the curb like today? Similarly, northbound 70 and 101 buses would use 3rd, SRTC, 4th, I guess.

# Response to Comment 27-17

The comment concerns the use of curbs on Hetherton Street for bus stops. In the Move Whistlestop Alternative, the southbound and northbound Route 70 and 101 buses would not stop on Hetherton Street and use the curbs, as they do under existing conditions, but would instead use bus bays in the new transit center, east of the SMART tracks.

#### **Comment 27-18**

And please put drop offs and taxis for East and west on the old slot by the tracks between 2nd and 3rd. There is where cars SHOULD be invited to be, ie on these two major arterial car priority streets! Please do NOT have the drop offs crossing the bike path on West Tamalpais there! Too dangerous for pedestrians getting out of cars, and for bicyclists riding north and south on Tamalpais both.

#### **Response to Comment 27-18**

The comment concerns the placement of pick-up and drop-off areas included in the Move Whistlestop and Adapt Whistlestop Alternatives relative to bicycle facilities. Please refer to the response to comment 7-3 for additional detail on the pick-up and drop-off area. The Move Whistlestop Alternative layout has been revised to move the pick-up and drop-off area to a new driveway west of West Tamalpais Avenue, between 3rd Street and 4th Street.

#### **Comment 27-19**

Please also provide a two way connected pathway along Fourth for bikes from move Whistlestop to West Tamalpais. We have to have a safe connection for bikes, as again, this is both priority North South Greenway AND priority ped bicycle Fourth St.

#### **Response to Comment 27-19**

The comment concerns bicycle access near the transit center under the Move Whistlestop Alternative. The Move Whistlestop Alternative does not include exclusive bicycle infrastructure on 4th Street due to a lack of roadway width. However, the project would not preclude the implementation of planned or future bikeway projects along 4th Street by the City.

#### **Comment 27-20**

Certifying the EIR and adopting / approving the project in 2022 only moves it to design, funding, and other activities. Construction is not imminent. Lots of details are still to be worked out.

# **Response to Comment 27-20**

The comment pertains to upcoming steps in the proposed project development process. The estimated construction schedule is presented in the Draft EIR in Chapter 2, Section 2.5.5, Construction Schedule. The comment does not concern the adequacy of the EIR and no further response is required.

### **Comment 27-21**

The drawings show the two way bikepath at Move Whistlestop dead ending into Fourth. It must continue East to connect to West Tamalpais

Schoolchildren have to use it. No autos please

### **Response to Comment 27-21**

The comment pertains to the two-way bikeway on West Tamalpais Avenue in the Move Whistlestop Alternative and its connection to West Tamalpais Avenue north of 4th Street. The proposed improvements to the intersection of 4th Street and West Tamalpais Avenue would allow for cyclists to cross 4th Street to connect to West Tamalpais Avenue north of 4th Street.

It is unclear where the commenter is suggesting that autos be removed. No autos will be allowed on West Tamalpais Avenue between 3rd and 4th Streets or be allowed to cross 4th Street on West Tamalpais Avenue. No modifications are proposed to West Tamalpais Avenue north of 4th Street, as that is outside the footprint of the project.