

## 9A.1 Additional Comments Received on the Draft Environmental Impact Report

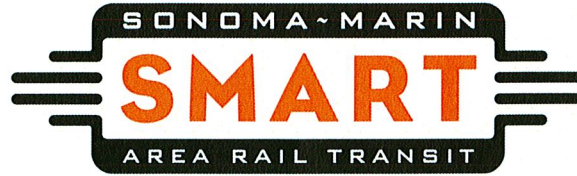
This chapter includes the text of comments received by the Golden Gate Bridge, Highway and Transportation District (District) on the Draft Environmental Impact Report (EIR) for the San Rafael Transit Center Replacement Project (proposed project) that were inadvertently omitted from the initial publication of the Final EIR and written responses to the comments on October 27, 2022. The comment letters (i.e., commenters) have been numbered as shown in Table 9A-1.

**Table 9A-1. List of Commenters**

| <b>Letter #</b>              | <b>Date of Comment</b> | <b>Organization</b>            | <b>Commenter Name(s)</b>      |
|------------------------------|------------------------|--------------------------------|-------------------------------|
| <b><i>Local Agencies</i></b> |                        |                                |                               |
| 28                           | November 1, 2021       | Sonoma-Marin Area Rail Transit | Emily Betts                   |
| <b><i>Organizations</i></b>  |                        |                                |                               |
| 29                           | November 1, 2021       | Marin County Bicycle Coalition | Warren J. Wells, AICP         |
| 30                           | November 2, 2021       | Marin Conservation League      | Robert Miller and Kate Powers |
| <b><i>Individuals</i></b>    |                        |                                |                               |
| 31                           | August 12, 2021        | N/A                            | Anonymous                     |
| 32                           | August 12, 2021        | N/A                            | Anonymous                     |
| 33                           | August 12, 2021        | N/A                            | Anonymous                     |
| 34                           | August 12, 2021        | N/A                            | Anonymous                     |
| 35                           | August 14, 2021        | N/A                            | Aaron Roller                  |
| 36                           | September 24, 2021     | N/A                            | Nimalan Mahendran             |
| 37                           | October 12, 2021       | N/A                            | Francine Falk-Allen           |
| 38                           | October 13, 2021       | N/A                            | Helen Young                   |
| 39                           | October 13, 2021       | N/A                            | Margaret Koren                |
| 40                           | October 15, 2021       | N/A                            | Bill Ghiringhelli             |

## 9A.2 Responses to Comments

The following sections include responses to each of the comments identified in the comment letters and identifies if revisions to the draft EIR were made. In responding to comments, the California Environmental Quality Act (CEQA) does not require a lead agency to conduct every test or perform all research, study, or experimentation recommended or demanded by a commenter. Rather, a lead agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good-faith effort at full disclosure is made in the EIR (State CEQA Guidelines Sections 15088, 15204).



**David Rabbitt, Chair**  
Sonoma County Board of Supervisors

**Barbara Pahre, Vice Chair**  
Golden Gate Bridge,  
Highway/Transportation District

**Judy Arnold**  
Marin County Board of Supervisors

**Melanie Bagby**  
Sonoma County Mayors' and  
Councilmembers Association

**Kate Colin**  
Transportation Authority of Marin

**Damon Connolly**  
Marin County Board of Supervisors

**Debora Fudge**  
Sonoma County Mayors' and  
Councilmembers Association

**Patty Garbarino**  
Golden Gate Bridge,  
Highway/Transportation District

**Susan Gorin**  
Sonoma County Board of Supervisors

**Dan Hillmer**  
Marin County Council of Mayors and  
Councilmembers

**Eric Lucan**  
Transportation Authority of Marin

**Chris Rogers**  
Sonoma County Mayors' and  
Councilmembers Association

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October 12, 2021

Raymond Santiago  
Principal Planner

Golden Gate Bridge, Highway and Transportation District  
1011 Andersen Drive, San Rafael, CA 94901-5318

[SRTC@goldengate.org](mailto:SRTC@goldengate.org)

**Re: Draft Environmental Impact Report for San Rafael Transit Center**

Dear Raymond,

The Sonoma-Marín Area Rail Transit District (SMART) has completed our review of the Draft Environmental Impact Report for the San Rafael Transit Center Relocation project. We support the selection of the "Move Whistlestop" Alternative and offer the following comments:

28-1

1. **Platform trees:** Figure ES-1 Move Whistlestop Alternative: the conceptual layout shows improvements on SMART property that will have to be reviewed closely by SMART as the design process continues. The proposed trees at each end of the platforms will not be acceptable to SMART as we have equipment cabinets in those locations. More importantly, anything that might obscure visibility will not be allowed. This is already an extremely busy area with pedestrians, cyclists, motorists and passengers. Thus, visibility is critical, especially for our train engineers as they enter and exit the station.

28-2

2. **Construction near active railroad:** Construction in and around the SMART station will be challenging and must not adversely affect SMART's ongoing operations. The GGHBDT should expect restricted work windows and access when working near the tracks. This may at times dictate night work. The GGHBDT will need to take appropriate precautions to protect SMART facilities and passengers during construction, including the relocation/demolition of the existing buildings.

- 28-3 3. **Sensitive Receptor:** The SMART station is not listed as a sensitive receptor in Table 3.11-11 (Sensitive Receptors within 0.5 miles). The SMART station, with passengers waiting for trains, must be considered a sensitive receptor. Temporary construction impacts (noise, dust, etc.) will have to be properly mitigated.
- 28-4 4. **Construction access:** GGHBTB must enter into an agreement with SMART to permit construction that addresses access, construction impacts, and other considerations. SMART and the GGHBTB executed a similar agreement for the work that SMART conducted in the existing San Rafael Transit Center as part of the Larkspur Extension Project.
- 28-5 5. **SMART Intersection Controls:** The demolition and construction phasing associated with the transit center will have an impact on the operation of the interconnected grade crossing warning systems and traffic control systems at 3rd and 4th Streets. The planning and execution of this work must be closely coordinated with SMART and the City of San Rafael; disruption to SMART's operations will not be permitted
- 28-6 6. **CPUC Review of Grade Crossings:** The proposed alterations to the at-grade crossings at 3rd and 4th Street will need to go through the process set forth under CPUC's General Order 88-B, which will involve conducting a site diagnostic review with CPUC, the City, and SMART, along with the project sponsor. The final proposed alterations must be approved by CPUC.
- 28-7 7. **SMART Maintenance Parking:** SMART has an existing designated maintenance parking spot located on the east side of West Tamalpais adjacent to SMART's existing train control equipment; this must be preserved.
- 28-8 8. **Impacts to Crossing Equipment:** The general changes shown on the north side of the at-grade crossing at 4th Street may have an impact to the existing grade crossing warning equipment and traffic signal equipment. SMART will need to review and approve detailed design for this area before construction occurs.
- 28-9 9. **Tracks Crossing West of 3<sup>rd</sup> Street:** Safety remains a major concern for SMART. The proposed changes shown in the southwest quadrant at 3rd Street will need to more thoroughly address path of travel across the tracks. All pedestrian crossings must be included in the CPUC diagnostic review.
- 28-10 10. **Pick-Up/Drop-off Area in Bike Lane:** The conceptual designs depict the area of W. Tamalpais immediately north of 4th Street as designated for pick-up/drop-off uses. Per the 2018 San Rafael Bicycle Master Plan, this street is planned for a protected bike lane and will be an important connection for bicyclists accessing the Puerto Suello pathway to the north. Bicyclist safety is not compatible with a pick-up area, which would see a high rate of parking turnover.
- 28-11 11. **Transit Support Facilities:** The preliminary design indicates a building to be designated for District Customer Service and Supporting Uses. SMART requests that the facility be designed

28-11  
cont'd

to support *all* transit operators serving the San Rafael Transit Center, to allow for consolidation of public information and facilities to serve all riders.

28-12

12. **Bike Station:** Transit and bicycling are compatible and reinforcing modes of transportation, and the San Rafael Transit Center sees a high number of passengers taking their bicycles onboard the buses and trains. Transit vehicles have limited bike capacity, and the uncertainty of being able take your bike onboard often leads to not utilizing this mode. The redesign of the SRTC provides an opportunity for incorporation of additional bike parking and a Bike Station, which can safely accommodate hundreds of bikes, and can be staffed or unstaffed. Both BART and Caltrain have implemented these at their stations. SMART recommends that the design team include a bike station in the Transit Center relocation design, adjacent or part of the Customer Service Building, easily accessible from the new Tamalpais Ave bike lane, as part of this multimodal travel hub, and work with TAM to determine project oversight.

28-13

13. **SMART Station Length:** The San Rafael Transit Center is a regional hub and the relocation and redesign have long-term implications for the potential for transit ridership in the North Bay. The ability of SMART to run trains with more than 3 cars is currently constrained by the block length in San Rafael, between 3rd and 4th street. Pre-pandemic, our 3-car trains were often at capacity, without room to expand. This project presents an opportunity to plan for a long-term vision of increased rail ridership in the North Bay, by using a creative design approach that allows for an increased train platform length. We encourage the project team to consider options that might allow for commuter rail growth to take place.

28-14

Thank you for the opportunity to review and comment on this project. Per the 2018 MOU between GGBHTD, SMART, and BATA, SMART is a responsible agency for the purposes of environmental review under CEQA and **the selected alternative must be approved by the SMART Board of Directors** before RM-3 monies can be allocated by BATA. We appreciate the ongoing partnership of GGBHTD on this important project and look forward to working together as the project progresses.

If you have any questions or need additional information, contact me at 707-794-3324 or [ebetts@sonomamarintrain.org](mailto:ebetts@sonomamarintrain.org).

Sincerely,



Emily Betts  
Principal Planner

## 9A.2.28.1 Response to Comment Letter 28, Sonoma-Marín Area Rail Transit

### Comment 28-1

*1. Platform trees: Figure ES-1 Move Whistlestop Alternative: the conceptual layout shows improvements on SMART property that will have to be reviewed closely by SMART as the design process continues. The proposed trees at each end of the platforms will not be acceptable to SMART as we have equipment cabinets in those locations. More importantly, anything that might obscure visibility will not be allowed. This is already an extremely busy area with pedestrians, cyclists, motorists and passengers. Thus, visibility is critical, especially for our train engineers as they enter and exit the station.*

### Response to Comment 28-1

The comment concerns the placement of trees on the platform at the relocated transit center under the proposed project. The locations of trees shown on Figure ES-1 of the Draft EIR, as referenced by the commenter, are not final locations; this figure presents an illustrative and conceptual site layout. The specific location of plantings will be refined during preliminary engineering and ultimately determined during final design of the project and will be planned in accordance with appropriate safety regulations, including any related to vegetation in proximity to the Sonoma-Marín Area Rail Transit (SMART) tracks to maintain appropriate visibility. No revisions to the Draft EIR are required.

### Comment 28-2

*2. Construction near active railroad: Construction in and around the SMART station will be challenging and must not adversely affect SMART's ongoing operations. The GGHBTB should expect restricted work windows and access when working near the tracks. This may at times dictate night work. The GGHBTB will need to take appropriate precautions to protect SMART facilities and passengers during construction, including the relocation/demolition of the existing buildings.*

### Response to Comment 28-2

The comment concerns construction in proximity to operations at the SMART station and restricted construction windows. The Draft EIR acknowledged that construction may be required at night on an intermittent basis (Final EIR page 3.11-28); the schedule for all phases of construction, including any relocation or demolition of existing structures, would be coordinated with the appropriate parties, including SMART, prior to beginning construction and would be included in the design plans and specifications. Construction schedules would comply with the appropriate health and safety regulations, such as those required by the City of San Rafael's (City's) municipal code noise ordinance (Final EIR page 3.11-14), and would be adhered to by the contractor during construction. This comment does not affect the EIR analysis and no revisions to the Draft EIR are required.

### Comment 28-3

*3. Sensitive Receptor: The SMART station is not listed as a sensitive receptor in Table 3.11-11 (Sensitive Receptors within 0.5 miles). The SMART station, with passengers waiting for trains, must be considered a sensitive receptor. Temporary construction impacts (noise, dust, etc.) will have to be properly mitigated.*

### **Response to Comment 28-3**

The comment indicates that the SMART station should be considered a “sensitive receptor” with respect to noise and dust and that temporary construction impacts will need to be mitigated. Regarding noise, Draft EIR Section 3.11, Noise, states: “Consistent with the Governor’s Office of Planning and Research’s State of California General Plan Guidelines, noise-sensitive receptors are defined in this document as residential land uses, schools, open spaces, nursing homes, hospitals, convalescent homes, and churches (Governor’s Office of Planning and Research 2017).” In addition to state standards, the Golden Gate Bridge, Highway and Transportation District considers hotels, motels, libraries, and cemeteries to be noise-sensitive receptors (page 3.11-20 of the Final EIR). Draft EIR Table 3.11-11 (Sensitive Receptors within 0.5 Mile of the Alternatives) identifies the sensitive receptors in the project area based on Categories 1, 2, and 3 pursuant to the Federal Transit Administration standard for transit noise, as described in Section 3.11.2.1. Therefore, transit and rail stations are not typically considered noise-sensitive land uses at the local, state, or federal level. However, temporary construction noise impacts were disclosed in the Draft EIR and Mitigation Measures MM-NOI-CNST-1, Use Best Noise Control Practices During Construction, and MM-NOI-CNST-3, Implement Vibration-Reducing Practices During Construction, are required to ensure that construction-related noise impacts are less than significant.

Regarding construction-related dust impacts and sensitive receptors, as stated in Draft EIR Section 3.2, Air Quality, “sensitive land uses are defined as locations where human populations, especially children, seniors, and sick persons, are present and where there is reasonable expectation of continuous human exposure according to the averaging period for the air quality standards (i.e., 24-hour, 8-hour, or 1-hour). Per BAAQMD, typical sensitive land uses are residences, hospitals, and schools. Parks and playgrounds, where sensitive receptors (e.g., children and seniors) are present, are also considered sensitive land uses (BAAQMD 2017a)” (page 3.2-14 of the Final EIR). Train stations are not explicitly defined by the Bay Area Air Quality Management District (BAAQMD) as a sensitive receptor. Moreover, they are not places where sensitive individuals would spend a significant amount of time. However, temporary air quality impacts from construction were disclosed in the Draft EIR and Mitigation Measure MM-AQ-CNST-1, Use Clean Diesel-Powered Equipment during Construction to Control Construction-Related Emissions, is required to ensure that construction-related air quality impacts are less than significant. Therefore, although the SMART station is not considered to be a sensitive receptor for noise or air quality in the EIR, construction-related impacts for both resource topics were analyzed and mitigation is included to reduce the impacts to less-than-significant levels. No revisions to the Draft EIR are required.

### **Comment 28-4**

*4. Construction access: GGHBTB must enter into an agreement with SMART to permit construction that addresses access, construction impacts, and other considerations. SMART and the GGHBTB executed a similar agreement for the work that SMART conducted in the existing San Rafael Transit Center as part of the Larkspur Extension Project.*

### **Response to Comment 28-4**

The comment suggests that the District should develop a construction access agreement with SMART. See the response to comment 28-2, above. The schedule for all phases of construction would be coordinated with the appropriate parties prior to beginning construction and in compliance with

applicable regulations. This coordination is expected to include an agreement with SMART. No revisions to the Draft EIR are required.

### **Comment 28-5**

*5. SMART Intersection Controls: The demolition and construction phasing associated with the transit center will have an impact on the operation of the interconnected grade crossing warning systems and traffic control systems at 3rd and 4th Streets. The planning and execution of this work must be closely coordinated with SMART and the City of San Rafael; disruption to SMART's operations will not be permitted.*

### **Response to Comment 28-5**

See the response to comment 28-2, above. The schedule for all phases of construction would be coordinated with the appropriate parties prior to beginning construction and in compliance with applicable regulations. No revisions to the Draft EIR are required.

### **Comment 28-6**

*6. CPUC Review of Grade Crossings: The proposed alterations to the at-grade crossings at 3rd and 4th Street will need to go through the process set forth under CPUC's General Order 88- B, which will involve conducting a site diagnostic review with CPUC, the City, and SMART, along with the project sponsor. The final proposed alterations must be approved by CPUC.*

### **Response to Comment 28-6**

The District will ensure that any proposed at-grade crossing alterations will be conducted according to California Public Utilities Commission (CPUC) requirements during final project design. At that time, any project modifications at and around the existing at-grade crossings will be evaluated in accordance with the applicable CPUC requirements. No revisions to the Draft EIR are required.

### **Comment 28-7**

*7. SMART Maintenance Parking: SMART has an existing designated maintenance parking spot located on the east side of West Tamalpais adjacent to SMART's existing train control equipment; this must be preserved.*

### **Response to Comment 28-7**

The comment concerns SMART's designated maintenance parking spot. With the modifications to the location of the pick-up/drop-off spaces, reflected in the Final EIR, this space would not be affected. The comment does not concern the adequacy of the EIR and no revisions to the Draft EIR are required.

### **Comment 28-8**

*8. Impacts to Crossing Equipment: The general changes shown on the north side of the at-grade crossing at 4th Street may have an impact to the existing grade crossing warning equipment and traffic signal equipment. SMART will need to review and approve detailed design for this area before construction occurs.*

### **Response to Comment 28-8**

The comment concerns potential impacts on at-grade crossing warning and traffic signal equipment. The District will coordinate with SMART for review of any design plans that would modify SMART's at-grade crossing warning and traffic signal equipment. In addition, any crossing warning equipment modifications would be reviewed and approved by CPUC as part of the General Order 88B application process. Geometric modifications proposed in the Draft EIR to the north of 4th Street were reduced with the relocation of the pick-up/drop-off spaces, as reflected in the Final EIR, which may alleviate the potential conflict raised in the comment. No revisions to the Draft EIR are required.

### **Comment 28-9**

*9. Tracks Crossing West of 3rd Street: Safety remains a major concern for SMART. The proposed changes shown in the southwest quadrant at 3rd Street will need to more thoroughly address path of travel across the tracks. All pedestrian crossings must be included in the CPUC diagnostic review.*

### **Response to Comment 28-9**

The comment concerns the path of travel across the SMART tracks. As stated in the response to comment 28-6 above, the District will conduct review according to CPUC guidelines during final project design. During the final design period, at-grade crossing modifications will be developed and evaluated in accordance with the applicable CPUC requirements. The District will coordinate with SMART and CPUC on potential opportunities for pedestrian crossing channelization at this crossing. No revisions to the Draft EIR are required.

### **Comment 28-10**

*10. Pick-Up/Drop-off Area in Bike Lane: The conceptual designs depict the area of W. Tamalpais immediately north of 4th Street as designated for pick-up/drop-off uses. Per the 2018 San Rafael Bicycle Master Plan, this street is planned for a protected bike lane and will be an important connection for bicyclists accessing the Puerto Suello pathway to the north. Bicyclist safety is not compatible with a pick-up area, which would see a high rate of parking turn over.*

### **Response to Comment 28-10**

This comment expresses concern with the proposed pick-up/drop-off location on West Tamalpais Avenue north of 4th Street related to planned bicycle infrastructure. To address this comment, the description of the Move Whistlestop Alternative was revised in the Final EIR to relocate the pick-up/drop-off area off the street along a new driveway west of West Tamalpais Avenue, extending between 3rd Street and 4th Street, avoiding conflict with planned bicycle infrastructure. No pick-up/drop-off will be located along West Tamalpais Avenue north of 4th Street with the Move Whistlestop Alternative. The description of the Adapt Whistlestop Alternative layout also was revised in the Final EIR to reflect a similar relocation of the pick-up/drop-off area. The Draft EIR was revised to reflect these design changes in Chapter 2 of the Final EIR. See Figures 2-4 and 2-5 in the Final EIR for the revised layouts of the Move Whistlestop Alternative and Adapt Whistlestop Alternative.



### **Comment 28-11**

*11. Transit Support Facilities: The preliminary design indicates a building to be designated for District Customer Service and Supporting Uses. SMART requests that the facility be designed to support all transit operators serving the San Rafael Transit Center, to allow for consolidation of public information and facilities to serve all riders.*

### **Response to Comment 28-11**

The comment requests that the customer service and support building provide space for all transit operators serving the San Rafael Transit Center. The customer service facility included in the proposed project is planned to include transit information for all operators, in a manner similar to the existing facility. The District will coordinate further with SMART and other operators to consider potential additional space allocation within the customer service facility during the design phase. No revisions to the Draft EIR are required.

### **Comment 28-12**

*12. Bike Station: Transit and bicycling are compatible and reinforcing modes of transportation, and the San Rafael Transit Center sees a high number of passengers taking their bicycles onboard the buses and trains. Transit vehicles have limited bike capacity, and the uncertainty of being able to take your bike onboard often leads to not utilizing this mode. The redesign of the SRTC provides an opportunity for incorporation of additional bike parking and a Bike Station, which can safely accommodate hundreds of bikes, and can be staffed or unstaffed. Both BART and Caltrain have implemented these at their stations. SMART recommends that the design team include a bike station in the Transit Center relocation design, adjacent or part of the Customer Service Building, easily accessible from the new Tamalpais Ave bike lane, as part of this multimodal travel hub, and work with TAM to determine project oversight.*

### **Response to Comment 28-12**

The comment recommends the inclusion of both bike parking and a bike station to accommodate larger numbers of bicyclists at the transit center. As described in Chapter 2, Project Description, and shown on Figures 2-4 through 2-7 in the Draft EIR, under all alternatives, the proposed project would include both bike racks and secure bike parking. The final layout of bicycle infrastructure at the transit center will be determined during final project design. No revisions to the Draft EIR are required.

### **Comment 28-13**

*13. SMART Station Length: The San Rafael Transit Center is a regional hub and the relocation and redesign have long-term implications for the potential for transit ridership in the North Bay. The ability of SMART to run trains with more than 3 cars is currently constrained by the block length in San Rafael, between 3rd and 4th street. Pre-pandemic, our 3-car trains were often at capacity, without room to expand. This project presents an opportunity to plan for a long-term vision of increased rail ridership in the North Bay, by using a creative design approach that allows for an increased train platform length. We encourage the project team to consider options that might allow for commuter rail growth to take place.*

### **Response to Comment 28-13**

The comment encourages the District to consider the potential role of the transit center in expanded use of commuter rail. The District agrees that the proposed project has an important role in encouraging use of multiple modes of transit. Chapter 2 of the Draft EIR, Project Description, identifies the project objectives, which include multiple objectives focused on providing connectivity between different modes of transit:

- Provide improved transit connectivity and ease of use in and around Downtown San Rafael.
- Enhance local and regional transit use by bringing together multiple modes of the transportation network—including the SMART-bus connection—into a hub that affords transit users the safest, most efficient means of using bus and rail services.
- Create a more accessible transit facility for all users by reducing vehicular, rail, bicycle, and pedestrian conflicts and improving safety. (Final EIR page 2-6)

Chapter 2 also states that “the proposed project would address near-term and long-term transit needs while improving the desirability and usability of transit for the local community and region” (Final EIR page 2-6).

The proposed project would not modify the alignment and configuration of 3rd and 4th Streets, which constrain the length of the SMART station block. However, the proposed project design would not preclude future modifications through other projects that may allow for future expansion.

No revisions to the Draft EIR are required.

### **Comment 28-14**

*Thank you for the opportunity to review and comment on this project. Per the 2018 MOU between GGBHTD, SMART, and BATA, SMART is a responsible agency for the purposes of environmental review under CEQA and the selected alternative must be approved by the SMART Board of Directors before RM-3 monies can be allocated by BATA. We appreciate the ongoing partnership of GGBHTD on this important project and look forward to working together as the project progresses.*

#### **Response to Comment 28-14**

The comment points to the agreements contained in the Memorandum of Understanding (MOU) between the District, SMART, and the Bay Area Toll Authority. The District has entered into MOUs with the City of San Rafael, SMART, and Bay Area Toll Authority with regard to the development of the replacement transit center and will continue to coordinate with these agencies as project development continues. No changes to the Draft EIR are required.



November 1, 2021

Raymond Santiago  
Principal Planner  
Golden Gate Bridge, Highway and Transportation District  
1011 Andersen Drive, San Rafael, CA 94901-5318

Re: San Rafael Transit Center Draft Environmental Impact Report

The Marin County Bicycle Coalition is pleased to see the progress being made on the San Rafael Transit Center Relocation Project. Transit is a key component of a bikeable region; many people in Marin use bicycles as first/last mile transportation on either end of a bus or train trip. This is especially true on SMART where, before Covid-19, hundreds of people would ride the train with their bikes every day.

While we are generally very supportive of the project and of the “Move Whistlestop” preferred alternative specifically, we have several pieces of feedback on the Draft Environmental Impact Report (DEIR).

#### **Pick-up/Drop-off Area on W Tamalpais**

29-1

The conceptual designs for the Move Whistlestop alternative show a pick-up/drop-off area on the east side of W Tamalpais Avenue, immediately north of 4th Street. This is directly in conflict with the 2018 San Rafael Bicycle and Pedestrian Master Plan (BPMP). In that document, project D-2 proposes to “Convert West Tamalpais Avenue into a one-way street in the southbound direction; create a Class IV protected bikeway between West Tamalpais and SMART right-of-way.”

The pick-up/drop-off area, as currently depicted, would preclude the planned Class IV bikeway as described above in the duly-adopted (BPMP). Such tradeoffs should fall in favor of the bikeway, as dictated by Policy M-3.5 from the 2040 General Plan, which states “Support efforts to create convenient, cost effective alternatives to single passenger auto travel.” Taxi and Uber/Lyft trips typically have a single passenger, making them effectively single passenger auto travel.

Lastly, Policy M-6.2 of the 2040 General Plan dictates that projects should be prioritized to improve the safety of pedestrians and bicycle users. The proposed pick-up/drop-off area would run counter to that, as a high-turnover parking area is incompatible with a heavily-trafficked bicycle route. Vehicles pulling in and out, as well as frequently opening car doors would pose a threat to through-riders.

29-2

### **Secure Bicycle Parking**

Though some train and bus riders bring their bicycles on board for last-mile connections on the far side of a transit trip, many do so because they lack a secure parking location at the origin of their transit trip. This takes up valuable space onboard the transit vehicle, limiting passenger capacity. To this end, we urge the project team to propose a bicycle station at the Transit Center, as exists at several BART and Caltrain stations. Such a facility could be staffed or unstaffed, but would provide covered, theft-resistant parking for bicycle users, encouraging people to reach the station by bike rather than automobile.

Given the rapid rise of electric bicycle ridership, this is particularly important, as people are generally unwilling to leave an e-bike parked at a standard bike rack all day.

### **Dual Right Turn from Hetherton**

The southbound dual right turn lane at the intersection of Hetherton St. and 3rd St. shown in the conceptual designs 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.

29-3

Policy M-2.2 of the 2040 General Plan states that “Higher levels of congestion may be accepted at particular intersections if necessary to ensure the safety of all travelers, including pedestrians...” This seems an instance where a design that has proven fatal *multiple times at this particular intersection* is being employed to reduce traffic congestion, in conflict with the above-cited policy.

We applaud the efforts to improve the experience for transit users in San Rafael and look forward to working with Golden Gate Transit and other stakeholders moving forward. If you have any questions, please feel free to reach out to me at [warren@marinbike.org](mailto:warren@marinbike.org) or 410-703-9898.

Sincerely,



Warren Wells  
Policy & Planning Director  
Marin County Bicycle Coalition

## 9A.2.29.1 Response to Comment Letter 29, Marin County Bicycle Coalition

### Comment 29-1

#### *Pick-up/Drop-off Area on W Tamalpais*

*The conceptual designs for the Move Whistlestop alternative show a pick-up/drop-off area on the east side of W Tamalpais Avenue, immediately north of 4th Street. This is directly in conflict with the 2018 San Rafael Bicycle and Pedestrian Master Plan (BPMP). In that document, project D-2 proposes to “Convert West Tamalpais Avenue into a one-way street in the southbound direction; create a Class IV protected bikeway between West Tamalpais and SMART right-of-way.”*

*The pick-up/drop-off area, as currently depicted, would preclude the planned Class IV bikeway as described above in the duly-adopted (BPMP). Such tradeoffs should fall in favor of the bikeway, as dictated by Policy M-3.5 from the 2040 General Plan, which states “Support efforts to create convenient, cost effective alternatives to single passenger auto travel.” Taxi and Uber/Lyft trips typically have a single passenger, making them effectively single passenger auto travel.*

*Lastly, Policy M-6.2 of the 2040 General Plan dictates that projects should be prioritized to improve the safety of pedestrians and bicycle users. The proposed pick-up/drop-off area would run counter to that, as a high-turnover parking area is incompatible with a heavily-trafficked bicycle route. Vehicles pulling in and out, as well as frequently opening car doors would pose a threat to through-riders.*

### Response to Comment 29-1

This comment expresses concern with the proposed pick-up/drop-off location on West Tamalpais Avenue north of 4th Street. To address this comment, the description of the Move Whistlestop Alternative was revised in the Final EIR to relocate the pick-up/drop-off area off the street along a new driveway west of West Tamalpais Avenue, extending between 3rd Street and 4th Street. No pick-up/drop-off will be located along West Tamalpais Avenue north of 4th Street with the Move Whistlestop Alternative. The description of the Adapt Whistlestop Alternative layout was also revised in the Final EIR to reflect the relocation of the pick-up/drop-off area. The Draft EIR was revised to reflect these design changes in Chapter 2 of the Final EIR. See Figures 2-4 and 2-5 in the Final EIR for the revised layouts of the Move Whistlestop Alternative and Adapt Whistlestop Alternative.

### Comment 29-2

#### *Secure Bicycle Parking*

*Though some train and bus riders bring their bicycles on board for last-mile connections on the far side of a transit trip, many do so because they lack a secure parking location at the origin of their transit trip. This takes up valuable space onboard the transit vehicle, limiting passenger capacity. To this end, we urge the project team to propose a bicycle station at the Transit Center, as exists at several BART and Caltrain stations. Such a facility could be staffed or unstaffed, but would provide covered, theft-resistant parking for bicycle users, encouraging people to reach the station by bike rather than automobile.*

*Given the rapid rise of electric bicycle ridership, this is particularly important, as people are generally unwilling to leave an e-bike parked at a standard bike rack all day.*

### **Response to Comment 29-2**

This comment expresses concern for secure bicycle parking. All alternatives would include space for secure bicycle parking close to the customer service facility. The final configuration of the bicycle parking facility would be determined as part of the final design phase of the project. No revisions to the Draft EIR are required.

### **Comment 29-3**

#### *Dual Right Turn from Hetherton*

*The southbound dual right turn lane at the intersection of Hetherton St. and 3rd St. shown in the conceptual designs 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.*

*Policy M-2.2 of the 2040 General Plan states that “Higher levels of congestion may be accepted at particular intersections if necessary to ensure the safety of all travelers, including pedestrians...” This seems an instance where a design that has proven fatal multiple times at this particular intersection is being employed to reduce traffic congestion, in conflict with the above-cited policy.*

### **Response to Comment 29-3**

This comment expresses concern with the second southbound right-turn lane from Hetherton Street onto 3rd Street included with the Move Whistlestop, Adapt Whistlestop, and 4th Street Gateway Alternatives. The second southbound right-turn lane was introduced to address a request by the City during the early stages of the project regarding the need to increase capacity for that movement. However, based on this comment and the City’s comments on the Draft EIR, the District has identified design modifications to the proposed project layout that fully separate the conflict between pedestrians and the southbound right-turn movement. The proposed configuration would include separate signalized control for the right-turn lanes and the pedestrian phase, making the vehicle and pedestrian phases sequential instead of concurrent, providing a substantial safety benefit relative to no-build conditions. Chapter 1, Introduction, and Chapter 2, Project Description, of the Final EIR have been revised to describe these modified project features. Figures 2-4, 2-5, and 2-6 in the Final EIR contain updated site layouts for the Move Whistlestop, Adapt Whistlestop, and 4th Street Gateway Alternatives, respectively. Traffic analysis included in the updated Transportation Summary Report reflects this proposed operation and indicates a significant benefit to circulation and reduction in congestion with the new design solution. The safety analysis included as an attachment to the Transportation Summary Report determines a safety benefit with the proposed solution. Therefore, the proposed project would eliminate existing hazards and no project impact would occur. No revisions to the Draft EIR are required.

November 2<sup>nd</sup>, 2021



Protecting Marin Since 1934

Raymond Santiago, Principal Planner  
Golden Gate Bridge, Highway, and Transportation District  
1011 Andersen Drive  
San Rafael, CA 94901-5318

Via email: [SRTC@goldengate.org](mailto:SRTC@goldengate.org)

RE: Comments on the Draft Environmental Impact Report (DEIR) for the San Rafael Transit Center (SRTC) Replacement Project

Dear Mr. Santiago:

Marin Conservation League (MCL) has tracked the visioning and planning processes for the SRTC Replacement Project (Project) since the Transit Center Relocation Study began in 2016. MCL provided scoping comments for the Project's environmental review in 2018 and appreciates this opportunity to provide comment on the DEIR document.

General comments – Consistency with San Rafael's General Plan 2040

30-1

The DEIR analysis refers to San Rafael's General Plan 2020 (GP2020) and to its General Plan 2040 (GP2040) in an inconsistent manner. While GP2020 was in effect on the date of Notice of Preparation (NOP), the GP2040 update process was already underway when the NOP was released. The planning process involved significant stakeholder and community input. Draft elements and associated reports and studies were posted on the City's website over the course of two years as they became available. San Rafael adopted both the GP2040 and a Downtown Precise Plan (DPP) on Aug 2, 2021, prior to release of the DEIR and as such they should be considered as relevant existing conditions for the project.

DEIR analysis should consistently refer to the goals, policies, and programs of GP2040 and DPP. The project will be constructed and operational while the GP2040 is in effect. It will influence *the future* of San Rafael and its development, not the twenty years GP2020 was in effect.

Greenhouse Gas (GHG) Emissions – Monitoring reduction goals for transportation

30-2

The DEIR reports on impacts due to GHG emissions from both Project construction and operations. The GHG section summarizes federal, state, and local policies and plans, including San Rafael's Climate Change Action Plan 2030 (CCAP), that target GHG emission reductions from transportation. Integration of transportation with land use and environmental planning is especially important for reducing GHG emissions. This will require further collaboration between GGBHTD

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |  
[mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

and the City of San Rafael because inconsistency between planning efforts would undermine the effectiveness of achieving the reduction goals.

30-2  
cont'd

Both San Rafael's GP2040 and DPP plan for significant growth near the Project. The DEIR Transportation Summary Report shows worsening levels of service and traffic delays at many intersections by 2040 which logically will impact GHG emissions and air quality. But the DEIR states that the proposed project includes measures that are consistent with state regulations that will reduce GHG emissions. Therefore, the impact is determined to be less than significant. No mitigation is required.

Transit can be a means of reducing GHGs if it serves to support productive development patterns that offset growth impacts. Regardless of whether it is required as mitigation or not, monitoring the Project's impacts on GHG emissions by focusing on increasing transit ridership would be worthwhile.

#### Hydrology – Planning for sea level rise (SLR) adaptation

All future development, especially the placement of critical transportation infrastructure, should include planning for a future of climate change and sea level rise. The DEIR of alternatives does not consider the impacts of locating SRTC in an area at increased risk for SLR and flooding nor what mitigations would be needed to best prepare the replacement project for continued operation during SLR and during increased intense storms.

30-3

The DEIR's associated *Appendix H: Preliminary Geotechnical Design Recommendations* produced by PARIKH did not account for anticipated sea level rise, associated rising groundwater and more frequent flooding as future subsurface conditions. According to the PARIKH report all alternative locations considered in DEIR would be built on fill overlaying mostly bay mud. These conditions are often associated with subsidence.

The City of San Rafael is in the midst of planning for sea level rise. Its Climate Change Action Plan 2030, Program SA-C4: Sea Level Rise, states, "Prepare and adapt to a rising sea level."

MCL's 2016 scoping comments included "state impacts or changes resulting from sea level rise scenarios as outlined in the County of Marin's Bay Waterfront Adaptation and Vulnerability Evaluation (BayWAVE)." DEIR should include analysis of future sea level rise scenarios for the life of the project and include associated elevated groundwater levels and how alternatives will impact future solutions for adaptation to SLR flooding.

The DEIR should assess the environmental impacts of building in proximity to the tidally influenced Erwin and San Rafael Creeks and as well as the rising Bay.



Hydrology – Incorporate green streets infrastructure

The DEIR should reference how build-out of each SRTC alternative would integrate the GP2040 Conservation and Climate Change policies and programs that it lists including creek protection, enhancement of drainages and creeks, reducing pollution to stormwater runoff, low impact development, green streets, erosion control, stormwater drainage improvements.

30-4 In particular, green streets infrastructure (GSI) should be integrated to help reduce anticipated exposure to flooding and to prevent stormwater pollution. GSI reduces heat island effects of paved surfaces, improves air quality and community “livability” in the public realm. Aligning a stormwater retrofit with mobility and active transportation could open up additional funding and resources.

Addressing drainage of the site with a sustainable stormwater system would address San Francisco Bay Regional Water Quality Control Board’s Municipal Regional Stormwater Pollution Prevention Phase II Permit requirements and align with GP2040 Policy CSI-4.4: Sustainable Design.

Biological Resources – Mature trees

30-5 The DEIR does not inventory existing mature trees for preservation, as described in GP2040 Policy C-1.17: Tree Management, which states “Encourage the preservation of healthy, mature trees when development and/or construction is proposed. Site plans should indicate the location of existing trees and include measures to protect them where feasible.” Mature trees play an important role as urban canopy for shade and protection against heat island effects. They support air quality and sequester carbon.

Infiltration rate and slope analysis should anticipate mature trees along with GSI in future geotechnical design considerations for drainage. DEIR should delineate specific trees that will be removed under each Alternative and where mature tree protection is not possible, onsite mitigation should be described.

Thank you for considering these comments.

Sincerely,



Robert Miller  
President



Kate Powers  
Land Use, Transportation, and Water Committee

## 9A.2.30.1 Response to Comment Letter 30, Marin Conservation League

### Comment 30-1

#### *1. General comments – Consistency with San Rafael's General Plan 2040*

*The DEIR analysis refers to San Rafael's General Plan 2020 (GP2020) and to its General Plan 2040 (GP2040) in an inconsistent manner. While GP2020 was in effect on the date of Notice of Preparation (NOP), the GP2040 update process was already underway when the NOP was released. The planning process involved significant stakeholder and community input. Draft elements and associated reports and studies were posted on the City's website over the course of two years as they became available. San Rafael adopted both the GP2040 and a Downtown Precise Plan (DPP) on Aug 2, 2021, prior to release of the DEIR and as such they should be considered as relevant existing conditions for the project.*

*DEIR analysis should consistently refer to the goals, policies, and programs of GP2040 and DPP. The project will be constructed and operational while the GP2040 is in effect. It will influence the future of San Rafael and its development, not the twenty years GP2020 was in effect.*

### Response to Comment 30-1

CEQA requires that an EIR rely on *adopted plans* as the basis for its analysis, not draft plans. At the time of preparation of the Draft EIR, *San Rafael General Plan 2040* and the *Downtown San Rafael Precise Plan* were not adopted but the District anticipated they could be adopted before the San Rafael Transit Center Replacement Project was completed. Therefore, in addition to including policies from *The City of San Rafael 2020 General Plan* and the 1993 *City of San Rafael Downtown Vision*, the District included policies from the Draft *San Rafael General Plan 2040* and the *Downtown San Rafael Precise Plan* throughout the Draft EIR in the environmental setting of each resource section. The Draft EIR reviewed the draft plans available on the City's website and explained in the Draft EIR that these documents were under preparation and had not yet been adopted. These City plans were adopted on August 2, 2021. The Draft EIR (distributed for public comment on August 11, 2021) was already in print when the City adopted *San Rafael General Plan 2040* on August 2, 2021.

By providing the public and decision-makers with an analysis of policies from both the current and future proposed general plans and specific plans for Downtown, the District ensured that both the proposed and adopted plans were analyzed in the Draft EIR.

The Final EIR was revised to remove reference to *The City of San Rafael General Plan 2020* and to update references to the adopted *San Rafael General Plan 2040* to reflect it as the current general plan. Similarly, references to the 1993 *City of San Rafael Downtown Vision* were updated to reflect the *Downtown San Rafael Precise Plan*. Based on the analysis presented in the Final EIR, updating the policies to *San Rafael General Plan 2040* has not resulted in any new significant or substantially more severe impacts previously identified in the Draft EIR. No revisions to the Draft EIR are required.

### Comment 30-2

#### *Greenhouse Gas (GHG) Emissions – Monitoring reduction goals for transportation*

*The DEIR reports on impacts due to GHG emissions from both Project construction and operations. The GHG section summarizes federal, state, and local policies and plans, including San Rafael's Climate*

*Change Action Plan 2030 (CCAP), that target GHG emission reductions from transportation. Integration of transportation with land use and environmental planning is especially important for reducing GHG emissions. This will require further collaboration between GGBHTD and the City of San Rafael because inconsistency between planning efforts would undermine the effectiveness of achieving the reduction goals.*

*Both San Rafael's GP2040 and DPP plan for significant growth near the Project. The DEIR Transportation Summary Report shows worsening levels of service and traffic delays at many intersections by 2040 which logically will impact GHG emissions and air quality. But the DEIR states that the proposed project includes measures that are consistent with state regulations that will reduce GHG emissions. Therefore, the impact is determined to be less than significant. No mitigation is required.*

*Transit can be a means of reducing GHGs if it serves to support productive development patterns that offset growth impacts. Regardless of whether it is required as mitigation or not, monitoring the Project's impacts on GHG emissions by focusing on increasing transit ridership would be worthwhile.*

### **Response to Comment 30-2**

The comment indicates that the District and the City will need to coordinate on consistency with the San Rafael Climate Change Action Plan (CCAP). Table 3.7-7, starting on page 3.7-24 of the Final EIR, includes an evaluation of the project's consistency with applicable measures from the CCAP. Many measures from the CCAP are not applicable to the project because they require action to be taken by the City (e.g., increase residential organic waste diversion, replace older city vehicles with low-emitting vehicles). Such measures are not applicable to the project because the District, as the lead agency for the project, does not have the land use authority and other jurisdictional control that would be required to ensure consistency with or implement the measures. The District cannot influence residential waste diversion or vehicle purchasing decisions for City-owned vehicles in San Rafael.

To clarify this issue, Section 3.7.2.2, Thresholds of Significance, was revised in the Final EIR as follows:

"As discussed in Section 3.7.1.1, Regulatory Setting, the City has adopted a qualified GHG emissions-reduction strategy: CCAP 2030. Because the City is not the lead agency for CEQA, this analysis does not rely on CCAP 2030 for tiering purposes. Rather, project consistency with applicable GHG reduction measures outlined in CCAP 2030 is discussed for informational purposes below. CCAP 2030 outlines state and local policies to reduce GHG emissions to meet the 2030 target of 40 percent below 1990 levels, consistent with SB 32's target. To make significance findings under CEQA, GHG emissions from the proposed project are evaluated on a sector-by-sector (e.g., energy, mobile, and water) basis using the most applicable regulatory programs, policies, and thresholds recommended by BAAQMD, CARB, and OPR."

Consequently, the EIR discusses only the CCAP measures that would be applicable to the project, as shown in Table 3.7-7. It is unclear what additional analysis or discussion the commenter would like to have added, because the CCAP measures applicable to the project are already included in Table 3.7-7 of the EIR. The comment indicates that the City will rely on a determination of the EIR's consistency with the CCAP. Pages 3.7-24 and 3.7-25 and Table 3.7-7 in the Final EIR provide a consistency analysis of the proposed project with applicable CCAP measures and analysis in the Draft EIR could be used to inform future decision-making.

The comment also suggests that monitoring the project's impacts on greenhouse gas (GHG) emissions by focusing on increasing transit ridership would be worthwhile. Because the impact was found to be less than significant, no mitigation is required as a part of the CEQA review process. However, the District closely monitors transit ridership as part of its ongoing business operations. Considering the associated effects of ridership on GHG emissions could be an additional item the District reviews, but a commitment to such monitoring is not required as a part of the CEQA process. No changes to the Draft EIR are required.

### Comment 30-3

#### *Hydrology – Planning for sea level rise (SLR) adaptation*

*All future development, especially the placement of critical transportation infrastructure, should include planning for a future of climate change and sea level rise. The DEIR of alternatives does not consider the impacts of locating SRTC in an area at increased risk for SLR and flooding nor what mitigations would be needed to best prepare the replacement project for continued operation during SLR and during increased intense storms.*

*The DEIR's associated Appendix H: Preliminary Geotechnical Design Recommendations produced by PARIKH did not account for anticipated sea level rise, associated rising groundwater and more frequent flooding as future subsurface conditions. According to the PARIKH report all alternative locations considered in DEIR would be built on fill overlaying mostly bay mud. These conditions are often associated with subsidence.*

*The City of San Rafael is in the midst of planning for sea level rise. Its Climate Change Action Plan 2030, Program SA-C4: Sea Level Rise, states, "Prepare and adapt to a rising sea level."*

*MCL's 2016 scoping comments included "state impacts or changes resulting from sea level rise scenarios as outlined in the County of Marin's Bay Waterfront Adaptation and Vulnerability Evaluation (BayWAVE)." DEIR should include analysis of future sea level rise scenarios for the life of the project and include associated elevated groundwater levels and how alternatives will impact future solutions for adaptation to SLR flooding.*

*The DEIR should assess the environmental impacts of building in proximity to the tidally influenced Erwin and San Rafael Creeks and as well as the rising Bay.*

### **Response to Comment 30-3**

The comment states that the Draft EIR did not adequately consider the effects of sea level rise on the alternatives and that the EIR should assess potential impacts in the context of anticipated sea level rise. CEQA requires analysis of the effect of the project on sea level rise, not the effect of sea level rise on the project. Therefore, a lead agency under CEQA does not analyze the potential effect that future environmental conditions might have on a project's future users or residents, according to the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District*.

Regarding the project's effect on sea level rise, Section 3.7 of the Draft EIR analyzes the proposed project's contributions to GHG emissions, which are a primary cause of sea level rise. As stated in Section 3.7, operation of the proposed project is not expected to increase vehicle miles traveled (VMT) and would support the shift from automobiles to public transit. Additionally, the proposed project is a transit-supportive project and by its nature would encourage the use of public transit to

reduce single-occupancy vehicle trips, VMT, and associated GHG emissions. Regarding flooding, Section 3.9, Hydrology and Water Quality, identifies the project's potential effects on flooding in the project area for both construction and operations including potential effects on Irwin and San Rafael Creeks.

Regarding Appendix H, Preliminary Geotechnical Design Recommendations, the investigation was focused on the impacts of the project on the geotechnical resources and the potential impacts of the project on subsidence are identified in Section 3.6, Geology and Soils, of the EIR; flooding impacts associated with the project are addressed in Section 3.9 of the Draft EIR.

Regarding the commenter's scoping comments and groundwater levels, groundwater levels were identified in the preliminary geotechnical report and the potential impacts of the project associated with groundwater levels were analyzed in Section 3.7 of the Draft EIR. The Draft EIR includes a discussion of the susceptibility of the existing transit center, the preferred alternative, and the build alternatives to inundation under multiple sea level rise scenarios in Section 3.9, Hydrology and Water Quality (page 3.9-11 of the Final EIR). The analysis revealed that flooding frequency is expected to increase as climate change influences sea level rise. The existing transit center site was assessed for projected changes in inundation potential resulting from sea level rise using the Our Coast Our Future visualization tool, which displays data from the Coastal Storm Modeling System (Point Blue Conservation Service and United States Geological Survey 2017). This model presents projected flood conditions under various sea level rise elevation scenarios, including 0.8 foot, 1.6 feet, 2.5 feet, 3.3 feet, and 4.1 feet. Under existing conditions, the Our Coast Our Future model shows that the existing transit center does not face flood risk from a no-storm or annual storm scenario. This model shows that the southern portion of the existing transit center would begin to experience partial, intermittent inundation from a no-storm scenario and an annual storm scenario at the 4.1-foot sea level rise scenario. During stronger storm events, the extent of flooding increases. The model shows that the existing transit center begins to face partial inundation from a 100-year (1 percent annual chance) storm at the 3.3-foot sea level rise scenario. The frequency and reach of inundation would increase as sea level rise increased. The sites of the Move Whistlestop Alternative and other build alternatives vary in susceptibility to flooding based on their location relative to San Rafael Creek, which is south of the project area. The model shows that the Move Whistlestop Alternative (proposed project) and build alternatives would not experience inundation under no-storm or annual storm condition at the 4.1-foot sea level rise scenario. The Move Whistlestop and Adapt Whistlestop Alternatives could be partially, intermittently inundated by a 100-year storm under the 3.3-foot sea level rise scenario, similar to the existing transit center. The 4th Street Gateway and Under the Freeway Alternatives would have similar but relatively lower risk of inundation in a 100-year storm under the 3.3-foot sea level rise scenario because they are farther from San Rafael Creek. This analysis of the proposed project's susceptibility to inundation under multiple sea level rise scenarios addresses the comment's request to provide analysis of future sea level rise scenarios for the life of the project.

No changes to the Draft EIR are required.

#### **Comment 30-4**

*Hydrology – Incorporate green streets infrastructure*

*The DEIR should reference how build-out of each SRTC alternative would integrate the GP2040 Conservation and Climate Change policies and programs that it lists including creek protection,*

*enhancement of drainages and creeks, reducing pollution to stormwater runoff, low impact development, green streets, erosion control, stormwater drainage improvements.*

*In particular, green streets infrastructure (GSI) should be integrated to help reduce anticipated exposure to flooding and to prevent stormwater pollution. GSI reduces heat island effects of paved surfaces, improves air quality and community "livability" in the public realm. Aligning a stormwater retrofit with mobility and active transportation could open up additional funding and resources.*

*Addressing drainage of the site with a sustainable stormwater system would address San Francisco Bay Regional Water Quality Control Board's Municipal Regional Stormwater Pollution Prevention Phase II Permit requirements and align with GP2040 Policy CSI-4.4: Sustainable Design.*

#### **Response to Comment 30-4**

The comment suggests that the proposed project should include stormwater improvements and green infrastructure options encouraged for consideration in new development in *San Rafael General Plan 2040* as a way to meet water quality requirements and ensure compliance with the adopted general plan. As stated in Draft EIR Section 3.9.2.3, Impacts (page 3.9-16 of the Final EIR):

*"Mitigation Measure MM-HYD-CNST-1 would include the preparation and implementation of a SWPPP and participation with the Construction General Permit. The SWPPP would contain site-specific BMPs implemented to control pollutants in stormwater discharge. Therefore, construction of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Potential impacts from construction activities would be less than significant with mitigation."*

Additionally, language regarding consideration of stormwater polices in *San Rafael General Plan 2040* and suggested improvements in the *Downtown San Rafael Precise Plan* as they relate to suggested stormwater and green infrastructure measures in the Downtown San Rafael area was incorporated into the discussion in Section 3.9, Hydrology and Water Quality, in the Final EIR (page 3.9-17 of the Final EIR). No changes to the Draft EIR are required.

#### **Comment 30-5**

*Biological Resources – Mature trees*

*The DEIR does not inventory existing mature trees for preservation, as described in GP2040 Policy C-1.17: Tree Management, which states "Encourage the preservation of healthy, mature trees when development and/or construction is proposed. Site plans should indicate the location of existing trees and include measures to protect them where feasible." Mature trees play an important role as urban canopy for shade and protection against heat island effects. They support air quality and sequester carbon.*

*Infiltration rate and slope analysis should anticipate mature trees along with GSI in future geotechnical design considerations for drainage. DEIR should delineate specific trees that will be removed under each Alternative and where mature tree protection is not possible, onsite mitigation should be described.*

#### **Response to Comment 30-5**

Trees identified in the study area during the project site visit are listed in Appendix F of the Final EIR (Appendix D of the Draft EIR). The City of San Rafael Tree Ordinance is listed in Section 3.3.1.1, Regulatory Setting. As described in the EIR, the City's tree ordinance does not require a formal

arborist survey for projects but does require a permit from the City's department of public works prior to disturbance or removal of trees along public streets, sidewalks, and walkways or total removal of stumps and roots of trees removed for the project. The ordinance also requires protection from damage to trees retained in the project area.

This is described in Impact BIO-5 in the Final EIR, "Conflict with Any Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance," and Mitigation Measure MM-BIO-CNST-3 requires fencing around trees to be retained in the project area. Text was added to this impact discussion in the Final EIR to clarify that the project will obtain a City tree permit for tree removal prior to construction of the selected project alternative. Additionally, discussion in Section 2.8 was expanded in the Final EIR to include the requirements to obtain a City tree permit; however, this clarification did not change conclusions regarding trees presented in the Draft EIR.

**From:** C <coral.august.dream@gmail.com>  
**Sent:** Thursday, August 12, 2021 9:33 AM  
**To:** SRTC  
**Subject:** Environmental Impact Report (DEIR) for SRTC Relocation Project Community Engagement

Hi SRTC,

As a local citizen, I would like to voice my concern that new building requires new planting.

As the globe heats up, more and more people are faced with heat exhaustion. Trees are ever more important in cleaning the air and lowering temperatures. Trees provide shade which cools the climate around them and they also reduce stress and promote emotional health.

Further research is shown in the articles below.

31-1

<https://www.npr.org/2021/06/23/1006223328/bringing-back-trees-to-forest-citys-redlined-areas-helps-residents-and-the-clima>

<https://www.npr.org/2019/09/04/755349748/trees-are-key-to-fighting-urban-heat-but-cities-keep-losing-them>

Please plant more trees for this project.

Best,

C



## 9A.2.31.1 Response to Comment Letter 31, Anonymous

### Comment 31-1

*As a local citizen, I would like to voice my concern that new building requires new planting.*

*As the globe heats up, more and more people are faced with heat exhaustion. Trees are ever more important in cleaning the air and lowering temperatures. Trees provide shade which cools the climate around them and they also reduce stress and promote emotional health.*

*Further research is shown in the articles below.*

*<https://www.npr.org/2021/06/23/1006223328/bringing-back-trees-to-forest-citys-redlined-areas-helps-residents-and-the-clima>*

*<https://www.npr.org/2019/09/04/755349748/trees-are-key-to-fighting-urban-heat-but-cities-keep-losing-them>*

*Please plant more trees for this project.*

### Response to Comment 31-1

The comment encourages the District to plant trees as a part of the proposed project. All build alternatives would include landscaping and plantings of trees on site. Landscaping plans, including the location of plantings, will be finalized in future design phases. No revisions to the Draft EIR are required.

**From:** GGBHTD website <noreply@goldengate.org>  
**Sent:** Thursday, August 12, 2021 5:34 PM  
**To:** SRTC  
**Subject:** SRTC project form submission

Hello SRTC Project Team,

A new online form was submitted as follows:

**32-1** **Questions & Comments:** Why do you need to spend millions of dollars yet again on a transit station that serves the public well, and is also not very old? Why didn't the planners of the SMART train take into consideration the effects of extending the train tracks through the Transit Center to Larkspur? I've been to the Transit Center many times, both before the construction of the SMART tracks and ever since, and things are fine the way they are. This seems to be a huge waste of money.

Please follow up as necessary.

## **9A.2.32.1      Response to Comment Letter 32, Anonymous**

### **Comment 32-1**

*Why do you need to spend millions of dollars yet again on a transit station that serves the public well, and is also not very old? Why didn't the planners of the SMART train take into consideration the effects of extending the train tracks through the Transit Center to Larkspur? I've been to the Transit Center many times, both before the construction of the SMART tracks and ever since, and things are fine the way they are. This seems to be a huge waste of money.*

### **Response to Comment 32-1**

The comment expresses general opposition to the proposed project, which is noted. This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are required.

**From:** GGBHTD website <noreply@goldengate.org>  
**Sent:** Thursday, August 12, 2021 10:27 PM  
**To:** SRTC  
**Subject:** SRTC project form submission

Hello SRTC Project Team,

A new online form was submitted as follows:

**33-1** | **Questions & Comments:** Concerns about the new pickup drop off location, there is no immediate crosswalk you have to walk west or east, pedestrians will jay walk instead of walking east or west. Suggest making a crosswalk from the pickup drop off location.

Please follow up as necessary.

## **9A.2.33.1 Response to Comment Letter 33, Anonymous**

### **Comment 33-1**

*Concerns about the new pickup drop off location, there is no immediate crosswalk you have to walk west or east, pedestrians will jay walk instead of walking east or west. Suggest making a crosswalk from the pickup drop off location.*

### **Response to Comment 33-1**

This comment expresses concern with the proposed pick-up/drop-off location on West Tamalpais Avenue north of 4th Street. To address this comment, the description of the Move Whistlestop Alternative was revised in the Final EIR to relocate the pick-up/drop-off area off the street along a new driveway west of West Tamalpais Avenue, extending between 3rd Street and 4th Street. No pick-up/drop-off will be located along West Tamalpais Avenue north of 4th Street with the Move Whistlestop Alternative. The description of the Adapt Whistlestop Alternative layout also was revised in the Final EIR to reflect the relocation of the pick-up/drop-off area. The Draft EIR was revised to reflect these design changes in Chapter 2 of the Final EIR. See Figures 2-4 and 2-5 in the Final EIR for the revised layouts of the Move Whistlestop Alternative and Adapt Whistlestop Alternative.

## Comment Letter 34

**From:** GGBHTD website <noreply@goldengate.org>  
**Sent:** Thursday, August 12, 2021 10:38 PM  
**To:** SRTC  
**Subject:** SRTC project form submission

Hello SRTC Project Team,

A new online form was submitted as follows:

34-1

**Questions & Comments:** Please turn the old transit center into Park and Ride lot with some trees and plants, There is never enough parking room under the highway and its currently occupied by people living there.

Please follow up as necessary.

## **9A.2.34.1 Response to Comment Letter 34, Anonymous**

### **Comment 34-1**

*Please turn the old transit center into Park and Ride lot with some trees and plants, There is never enough parking room under the highway and its currently occupied by people living there.*

### **Response to Comment 34-1**

The comment concerns the future use of the existing transit center site. Section 2.5.4, Disposition of Existing Transit Center Site, provides a detailed discussion of the disposition of the existing transit center and what the assumptions are for the EIR. Draft EIR Section 2.5.4 stated that the “District does not have any planned use for the existing site/center once the proposed transit center is operational at a new location and there are no plans for the disposition of the site. Therefore, future development of the site is unknown at this time.” This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are required.

## Comment Letter 35

**From:** GGBHTD website <noreply@goldengate.org>  
**Sent:** Saturday, August 14, 2021 6:59 AM  
**To:** SRTC  
**Subject:** SRTC project form submission

Hello SRTC Project Team,

A new online form was submitted as follows:

**35-1** **Questions & Comments:** As a Sausalito-San Rafael Airport commuter that passes through the transit center, I applaud the proposed bikeway that will almost close the North South Greenway gap. The current experience on a bicycle is chaotic and non obvious leaving the safest choices to travel against lightly traveled one-way streets. The bikeway also advertises to all that riding to the transit center to catch a bus is a safe and efficient way to travel. Aaron Roller - Sausalito PBAC Chair

Please follow up as necessary.



## **9A.2.35.1 Response to Comment Letter 35, Aaron Roller**

### **Comment 35-1**

*As a Sausalito-San Rafael Airport commuter that passes through the transit center, I applaud the proposed bikeway that will almost close the North South Greenway gap. The current experience on a bicycle is chaotic and non obvious leaving the safest choices to travel against lightly traveled one-way streets. The bikeway also advertises to all that riding to the transit center to catch a bus is a safe and efficient way to travel. Aaron Roller - Sausalito PBAC Chair*

### **Response to Comment 35-1**

The comment provides general support for the bicycle improvements included in the proposed project. This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are required.

## Comment Letter 36

**From:** Nimalan Mahendran <nimalan.mahendran@gmail.com>  
**Sent:** Friday, September 24, 2021 9:23 AM  
**To:** SRTC  
**Subject:** SRTC DEIR Comment

Hello,

I am a resident of San Rafael (in Terra Linda) and would like to be able to get around the local area and commute to San Francisco by bike and/or public transit, rather than by car.

I support the Move Whistlestop Alternative for the San Rafael Transit Center. However, I have three pieces of feedback on the DEIR.

- 36-1 | 1. 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.
- 36-2 | 2. 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.
- 36-3 | 3. There should be a safe and protected connection on the bike route from Mission and Hetherton to 4th and Tamalpais Ave. Currently, the route involves going straight through intersections (Hetherton at Mission, 5th and 4th) where drivers routinely do not wait for their signal to turn right, which is very dangerous to pedestrians and cyclists alike.

Thanks,

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Nimalan Mahendran

## 9A.2.36.1 Response to Comment Letter 36, Nimalan Mahendran

### Comment 36-1

1. *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.*

### Response to Comment 36-1

This comment expresses concern with the proposed pick-up/drop-off location on West Tamalpais Avenue north of 4th Street. The description of the Move Whistlestop Alternative was revised in the Final EIR to relocate the pick-up/drop-off area off the street along a new driveway west of West Tamalpais Avenue, extending between 3rd Street and 4th Street. No pick-up/drop-off will be located along West Tamalpais Avenue north of 4th Street with the Move Whistlestop Alternative. The description of the Adapt Whistlestop Alternative layout was also revised in the Final EIR to reflect the relocation of the pick-up/drop-off area. The Draft EIR was revised to reflect these design changes in Chapter 2 of the Final EIR. See Figures 2-4 and 2-5 in the Final EIR for the revised layouts of the Move Whistlestop Alternative and Adapt Whistlestop Alternative.

### Comment 36-2

2. *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 36-2

This comment expresses concern with the second southbound right-turn lane from Hetherton Street onto 3rd Street included with the Move Whistlestop, Adapt Whistlestop, and 4th Street Gateway Alternatives. The second southbound right-turn lane was introduced to address a request by the City during the early stages of the project regarding the need to increase capacity for that movement. However, based on this comment and the City's comments on the Draft EIR, the District has identified design modifications to the proposed project layout that fully separate the conflict between pedestrians and the southbound right-turn movement. The proposed configuration would include separate signalized control for the right-turn lanes and the pedestrian phase, making the vehicle and pedestrian phases sequential instead of concurrent, providing a substantial safety benefit relative to no-build conditions. Chapter 1, Introduction, and Chapter 2, Project Description, of the Final EIR have been revised to describe these modified project features. Figures 2-4, 2-5, and 2-6 in the Final EIR contain updated site layouts for the Move Whistlestop, Adapt Whistlestop, and 4th Street Gateway Alternatives, respectively. Traffic analysis included in the updated Transportation Summary Report reflects this proposed operation and indicates a significant benefit to circulation and reduction in congestion with the new design solution. The safety analysis included as an attachment to the Transportation Summary Report determines a safety benefit with the proposed solution. Therefore, the proposed project would eliminate existing hazards and no project impact would occur. No revisions to the Draft EIR are required.

### **Comment 36-3**

*3. There should be a safe and protected connection on the bike route from Mission and Hetherton to 4th and Tamalpais Ave. Currently, the route involves going straight through intersections (Hetherton at Mission, 5th and 4th) where drivers routinely do not wait for their signal to turn right, which is very dangerous to pedestrians and cyclists alike.*

### **Response to Comment 36-3**

The comment suggests that there should be a protected connection on the bike route from Mission Avenue and Hetherton Street to 4th Street and Tamalpais Avenue.

Existing bicycle infrastructure and proposed modifications to these existing facilities are described in Section 3.13 of the Draft EIR, 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 through the project area (referred to as the North-South Greenway) and a project that would install a bikeway along 4th Street to create an east to west Downtown connection for bicyclists. While not a part of the proposed project, the proposed project would not preclude implementation of the planned North-South Greenway, which would connect along Tamalpais Avenue to Mission Avenue, addressing the commenters' concern.

The project alternatives are consistent with the City's future Greenway Alignment along West Tamalpais Avenue. Under the Move Whistlestop Alternative and Adapt Whistlestop Alternative, the project would construct a portion of the City's planned Class IV bicycle facility on West Tamalpais Avenue between 2nd Street and 4th Street. The other build alternatives would neither construct nor preclude construction of the future Greenway Alignment along Tamalpais Avenue. Therefore, all alternatives are consistent with planned improvements to the City's bicycle network.

No revisions to the Draft EIR are required.

**From:** Francine Allen <francineallen@comcast.net>  
**Sent:** Tuesday, October 12, 2021 5:23 PM  
**To:** SRTC  
**Subject:** Request for more information via website link  
  
**Importance:** High

Hello,

I am a senior with a disability (paralyzed leg from polio) living in eastern San Rafael.

I have just read that you will be relocating the transit center in San Rafael. I have mixed feelings about this. I realize that it's possible that those using SMART may not be the same people using the buses, but it seems that you would want the two to be close together in order to provide a real center of public transportation. It is too bad this was not well thought out originally.

37-1

I have wanted to use SMART to go and visit friends in Sonoma County many times. However, there is no place to park anywhere near the train in downtown San Rafael, and some of the stops in Santa Rosa also have no close parking. So if I want to drive to the train and park and take it, or even take a bus to San Francisco, this is impossible. The closest parking is three blocks away, which is ridiculous for a person using a cane or crutches. I might be able to bring my scooter, which needs to be assembled at the parking lot, and then I would have to disassemble it at my destination to put it in a friend's car.

So my request is this: Please include ample DP parking whenever and wherever you have a transit center, especially close to the train stops.

Thank you,  
Francine Falk-Allen, Author  
Member of City of San Rafael's ADA Compliance Review Committee  
Facilitator for Polio Survivors of Marin

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## 9A.2.37.1 Response to Comment Letter 37, Francine Falk-Allen

### Comment 37-1

*I am a senior with a disability (paralyzed leg from polio) living in eastern San Rafael.*

*I have just read that you will be relocating the transit center in San Rafael. I have mixed feelings about this. I realize that it's possible that those using SMART may not be the same people using the buses, but it seems that you would want the two to be close together in order to provide a real center of public transportation. It is too bad this was not well thought out originally.*

*I have wanted to use SMART to go and visit friends in Sonoma County many times. However, there is no place to park anywhere near the train in downtown San Rafael, and some of the stops in Santa Rosa also have no close parking. So if I want to drive to the train and park and take it, or even take a bus to San Francisco, this is impossible. The closest parking is three blocks away, which is ridiculous for a person using a cane or crutches. I might be able to bring my scooter, which needs to be assembled at the parking lot, and then I would have to disassemble it at my destination to put it in a friend's car.*

*So my request is this: Please include ample DP parking whenever and wherever you have a transit center, especially close to the train stops.*

*Thank you,*

*Francine Falk-Allen, Author*

*Member of City of San Rafael's ADA Compliance Review Committee*

*Facilitator for Polio Survivors of Marin*

### Response to Comment 37-1

The comment requests that disabled placard (Americans with Disabilities Act [ADA]) parking be provided at the transit center. The proposed project does not include new or modify existing public parking specifically for the transit center. As described in Draft EIR Chapter 2, Project Description, it would affect some on-street parking, including one existing ADA space on West Tamalpais Avenue between 3rd and 4th Streets. This space would be replaced and relocated to West Tamalpais, south of 3rd Street. There would be no loss of existing ADA parking.

Additionally, the proposed project would result in bus service at the transit center being located closer to SMART service than under existing conditions, which would address some of the commenter's concerns about proximity between bus service and SMART. No revisions to the Draft EIR are required.

**From:** Helen Y <hyoung135@gmail.com>  
**Sent:** Wednesday, October 13, 2021 12:10 PM  
**To:** SRTC  
**Subject:** SRTC Relocation Project - Opposed

Raymond -

38-1

I am AGAINST the current draft plan to relocate the transit hub in San Rafael. I live in San Rafael and pass the current location frequently. I think this draft plan is incomplete. I agree with San Rafael officials who think it is not well thought out. I also believe relocating the current hub is UNNECESSARY. At the very least, we need to delay making this decision until post-pandemic traffic is better known.

I believe: 1) the current location is fine and does NOT need to be moved; 2) do not make a decision now, wait.

Helen Young  
San Rafael resident

## **9A.2.38.1 Response to Comment Letter 38, Helen Young**

### **Comment 38-1**

*I am AGAINST the current draft plan to relocate the transit hub in San Rafael. I live in San Rafael and pass the current location frequently. I think this draft plan is incomplete. I agree with San Rafael officials who think it is not well thought out. I also believe relocating the current hub is UNNECESSARY. At the very least, we need to delay making this decision until post-pandemic traffic is better known.*

*I believe: 1) the current location is fine and does NOT need to be moved; 2) do not make a decision now, wait.*

### **Response to Comment 38-1**

The comment expresses general opposition to the proposed project, which is noted. This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are required.



**From:** Maggi <maggik3@sonic.net>  
**Sent:** Wednesday, October 13, 2021 12:39 PM  
**To:** SRTC  
**Subject:** Comment Regarding the new Smart Train Centre

I think all public transit should be centered at the Larkspur Landing Ferry. The shuttle bus from San Rafael is too far from the ferry for the elderly and mothers with little children.

39-1

I also have to take 2 buses to get from Windsor to get to the Santa Rosa Transit Mall for bus or train. I don't have a car and have to walk a mile to the bus stop. The Windsor Train Depot is not worth my consideration since it is in the middle of nowhere with poor almost zero public transport connections for pedestrians.

I have been so disappointed with the 'SMART' outcome after so many years.

Thank you for the opportunity for me to speak up. Good Luck

~ maggi

Sent from my iPhone.

Margaret Koren

Windsor CA.

## 9A.2.39.1 Response to Comment Letter 39, Margaret Koren

### Comment 39-1

*I think all public transit should be centered at the Larkspur Landing Ferry. The shuttle bus from San Rafael is too far from the ferry for the elderly and mothers with little children.*

*I also have to take 2 buses to get from Windsor to get to the Santa Rosa Transit Mall for bus or train. I don't have a car and have to walk a mile to the bus stop. The Windsor Train Depot is not worth my consideration since it is in the middle of nowhere with poor almost zero public transport connections for pedestrians.*

*I have been so disappointed with the 'SMART' outcome after so many years.*

*Thank you for the opportunity for me to speak up.? Good Luck*

### Response to Comment 39-1

The commenter suggests an alternative location for the transit center (the Larkspur Landing Ferry). CEQA Section 15126.6 requires that an EIR consider “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” Relocating the transit center to the Larkspur Landing Ferry location approximately 3 miles south of the existing transit center and outside of San Rafael’s central Downtown core would fail to meet the project’s basic objectives including providing improved transit connectivity, ease of use in and around Downtown San Rafael, and convenient, pedestrian connections to surrounding land uses.

Because this alternative location is far from the existing Downtown SMART station, transfers between bus lines and SMART in the Downtown area would be essentially unattainable for pedestrians given the 3-mile distance. This alternative would not achieve the project objective of implementing a cost-effective facility, as this alternative would result in out-of-direction travel for nearly all bus routes, adding substantial delay for buses and congestion to nearby roadways. Additionally, because Downtown San Rafael is the origin and destination for many users of the transit center, this Larkspur location would make transit inconvenient for many users. For the reasons discussed, alternative locations outside of the Downtown core, like the Larkspur Landing Ferry location, were considered infeasible and eliminated from further analysis as part of the *San Rafael Transit Center Relocation Study* finalized in 2017. No revisions to the Draft EIR are required.

**From:** WILLIAM GHIRINGHELLI <billgman@comcast.net>  
**Sent:** Friday, October 15, 2021 11:41 AM  
**To:** SRTC  
**Subject:** public comments on San Rafael Transit Station

40-1

The current transit station seems just fine. The new \$40million+ project seems like an unnecessary waste of money. It seems like since money is allocated government always needs to find a way to spend the money no matter what. No relocation is the best alternative.

Bill Ghiringhelli  
phone: 510-396-3148

## **9A.2.40.1 Response to Comment Letter 40, Bill Ghiringhelli**

### **Comment 40-1**

*The current transit station seems just fine. The new \$40million+ project seems like an unnecessary waste of money. It seems like since money is allocated government always needs to find a way to spend the money no matter what. No relocation is the best alternative.*

### **Response to Comment 40-1**

The comment expresses general opposition to the proposed project, which is noted. This comment does not concern the adequacy of the EIR. No revisions to the Draft EIR are required.