Appendix D

NOP Comments

Scoping Meeting Comment Cards
Scoping Comments
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SCOPING MEETING COMMENT CARDS
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COMMENT CARD

Name: Barbara Alexander

Affiliation/Business: ________________________________

Address: 63 Harvard Dr., Larkspur 94939

Email: barbara.alexander36@gmail.com

Phone: 415-847-3210

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

2. Two story concept is good – gets houses up and out of way.
3. Whistlestop block concept seems simplest & most low profile.
COMMENTS CARD

Name: Sylvie Anderson

Affiliation/Business: Marin School of Environmental Leadership

Address: 340 Holly Drive

Email: sylvieanderson@marinse1.org

Phone: (415) 747-7369

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:
- Make sure it (transit center, stops, buses) are in a safe, family-friendly location.
- The more secure and bright it is, the more youth will want to use it!
COMMENTS CARD

Name: RICK DECKSTROM

Affiliation/Business: PROPERTY OWNER

Address: 491-A WILSON AVE, NOVATO 94947

Email: RICK-PAT1@MSN.COM

Phone: 209-470-5904

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
As a property owner of an adjacent parcel to the proposed transit facility, I have not received notification of these proposals in advance.
COMMENT CARD

Name: Jill Carmody
Affiliation/Business: Smiling Hearts Hair Studio - Arantea Plaza
Address: 340 Riviera Drive, San Rafael
Email: hairybyday@gmail.com
Phone: 415-250-0969

Comments may be submitted following the meeting via email to SRTC@goldengate.org.
Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
We need parking!

Comments:

Parking: safe, accessible, metered-like at downtown Wells Fargo Bank & clear security.

Use the existing property where the transit center occupies and give us some great parking possibilities. Two story/3 story.

Anytime we use the SMART train we are hiking all over looking for parking that is longer than 2 hrs. Really a drawback & not visionary.

This parking is also available for downtown events - open 24/7.

*This parking structure will not be a new home for San Rafael's homeless.
C O M M E N T   C A R D

Name: Alice Cochran

Affiliation/Business: Dominican Univ. - adj. prof.

Address: 245 Jewel Street

Email: Alice.AliceCochran.com

Phone: 415-457-8991

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

1. I like the "Block Concept" using the parking lot across Tumwater.
2. Connecting the bus stops at 5th Street and 4th Street closer to Freeway.
3. The transit center needs a better passenger pick-up/drop off than exists now. (Currently on a city street)
4. The pedestrian plaza + continuing bike path are a "no brainer" the street elevating bus stops make a barrier and is more expensive.
5. The Whistlestop Plaza should be an attractive place with a visitor/info center, cafes, shops (think Ferry Plaza)
6. Using the "Block Concept" it could be an open "pass through" from one set of platforms to another.

I agree.
COMMENT CARD

Name: BJORN GRIEPENBURG

Affiliation/Business: MARIN COUNTY BICYCLE COALITION

Address: ____________________________

Email: BJORN@MARINBIKE.ORG

Phone: 415-723-4673

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

I do not see any of MCB3's previous feedback, nor bike routes adopted in the City of SM's Bike/Ped Master Plan + Station Area Plan incorporated.

Our highest priority is the creation of all ages + abilities bike routes on 4th St. and Tamalpais West. The pick-up/drop-off zones and bus bays on Tamalpais are incompatible with this vision.
Name: Jim Harrison

Affiliation/Business: ________________________________

Address: ________________________________

Email: JimHarrison1@comcast.net

Phone: ________________________________

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

1) With the 2 story concept you have the opportunity to have an elevated pedestrian crossing over Heatheron.

2) Must have bike path. Through Center W 8th ending at 4th Street (going south).


COMMENT CARD

Name: Steve Lamb
Affiliation/Business: 
Address: S.A.
Email: SLAMB51@yahoo.com
Phone: 

GOLDEN GATE BRIDGE
Comments: Bicycle & pedestrian safety, circulation, access, parking, ease of use are all very important to me.
COMMENTS CARD

Name: Cynthia Landecker

Affiliation/Business: San Rafael Heritage

Address: 127 San Rafael Ave., San Rafael, CA 94901

Email: clandecker@sauber.net

Phone: 415 456-0221

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

1. It is vitally important that under the "Cultural Resources"
   separate of the EIR, a thorough evaluation of all historic
   buildings in the transit center area be made. The NWP depot,
   the two Queen Annes at 5th and Hotherton, can be a vital
   part of "reflecting San Rafael's history and culture."

2. If "placemaking components" mean elements that give
   an economic, aesthetic, and cultural identity to the area, the
   NWP depot is a perfect historic resource that could be used
   in this way if it is preserved for adaptive reuse.
COMMENT CARD

Name: Gretchen Leavitt

Affiliation/Business: 

Address: 255 C St. San Rafael, CA 94901

Email: gretchen.leavitt@sbcglobal.net

Phone: 415-731-8050

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

I'm mostly alone when I take public transit, so keeping the transit center close to the SMART train would be my preference. I don't want the transit center located to the other side of the highway. The 7-story option looks like a good alternative. 4th St. Gateway looks best to me.
COMMENTS CARD

Name: KRAMATI, MANASA (COALITION LEADER)
Affiliation/Business: SAUSALITO TAXI-CAB COALITION
Address:
Email: gemquest42@gmail.com
Phone: (415) 532-7002

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

DEAR SIR/MADAM

PLEASE BE ADVISED THAT THE SAUSALITO TAXI-CAR CONDITION HAS TO DATE ABOUT 17+ MEMBERS WANTING TO HAVE PARTICIPATION IN THE CENTER OF THE TRANSIT PLAN AS TAXI-CAR SERVICE IS STILL A NEEDED ON SIGHT, ON DEMAND, TRAVEL SOLUTION WHEN OTHER OPTIONS FALL APART. I WOULD SO MUCH APPRECIATE CONTACT WITH THE AUTHORITY TO DISCUSSION.
COMMENT CARD

Name: Patrick Munthya

Affiliation/Business: ________________________________

Address: 61 Labrea way, San Rafael, CA 94903

Email: Patrick.munthya@comcast.net

Phone: (415) 050 4787

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

OWNS taxi express co.

We would like to see a logical taxi stands to accommodate the many taxis that are in Marin County.
Name: Hugh Murphy
Affiliation/Business: VMI Architecture, Inc.
Address: 637 Fifth Ave, San Rafael, CA 94901
Email: hmurphy@vmarc.com
Phone: 415-451-2500

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:
The 4th Street Gateway Concept significantly impacts our city's cultural heritage by proposing the demolition of two historical buildings (635-637 5th Ave) circa 1895 Queen Anne Victorian. Also, by spreading out over 3 blocks this concept completely changes the approach to the main downtown corridor.
Abandon the 4th St Gateway Concept!
COMMENT CARD

Name: KEVIN C. O'KEEFE
Affiliation/Business: STEARNS LENDING LLC
Address: 3 SAN MARINO CT, SAN RAFAEL 94901
Email: LOANS@OKEEFE.ORG
Phone: 415-613-3313

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

In order of importance (1) Impact on E-W traffic flow to 10) Entrance and exit.

Specificially on morning flow to 101 S.

(3) More of same - Minimize # of streets with 2 story seems worst of this.

Entrances/exits to/from center

(4) Minimize impact on available parking.

Will also submit additional online.
NAME:       JEFF OLSON

AFFILIATION/BUSINESS:       CITIZEN'S OVERSIGHT COMM. T.A.M.

ADDRESS:       217 ALPINE ST       SAN RAFAEL

EMAIL:       jeolsonster@gmail.com

PHONE:       415 699 4272

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

- Short & Safe Pedestrian Route is Best on Plan
- "Whistle Stop" Block
- 4th Street Gateway
- Routes to & from; and Route II OK on Plan's; across Fwy w/ Heads to NW Fwy
- Internal to bus/train
- Route II NG on Danis-North of 4th
- 2 Story
- Reuse Old Site as Parking?

Commuter Parking is Diminished - What Plans Are About?

Food & Beverage Vendors? Need a Centralized Facility

Because we have failed in 2 previous plans to

So: This time, let's work to minimize

The number of steps, stairs, and major road crossings in getting between buses, and from buses to SMART trains

SMART

1. Elevate tracks over 3rd, 4th & 5th streets
2. To connect future end of line at Larkspur to 100 yards of ferry instead of 1/2 mile

What were they thinking? It's at least (800') to ferry, and when it rains...?
COMMENT CARD

Name: David Potter

Affiliation/Business: Consulting Services

Address: 90 Woodside Dr San Anselmo

Email: PotterD@msn.com

Phone: (415) 608-7797

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

1. Increased foot traffic across busy highways - bad idea, would eliminate all split proposals
2. Everything located together (train + bus) is better
3. Best options
   - Two story
   - Whistle stop block
4. Process is moving too slowly
COMMENT CARD

Name: Niko Reed

Affiliation/Business: None

Address: 328 DuBois St San Rafael

Email: niko@mrreel.com

Phone: 415 535 7789

Comments may be submitted following the meeting via email to SRTC@goldergate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

Hundreds of students from schools like San Rafael High and Davidson Middle School ride the 35 bus route for their commute to and from San Rafael. They face long and dangerous walks between school and the transit center, busy intersections, and have to wait for a long time. This is why I think the 35 bus routes should be rerouted to stop at these schools, or create a separate route for this that is scheduled with the school arrival/dismissal times. This would be much faster, safer, and easier for students.
COMMENTS CARD

Name: Niko Reed

Affiliation/Business: None

Address: 328 DuBois St San Rafael

Email: Niko@Mruk.com

Phone: 1415 285357789

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

There should be spoken announcements at the transit center of bus/smart schedules because sometimes you're not paying attention or you're on your phone or for deaf people to know when their bus is going to come. For example: "35 towards Canal arriving in 8 minutes on platform B"
COMMENT CARD

Name: Niko Reed

Affiliation/Business: None

Address: 328 BuBois st. San Rafael CA

Email: mrreedi@gmail.com

Phone: 415 585 7789
Comments:

I think where the buses go should be parallel to the 3rd and 4th streets instead of perpendicular because buses wouldn't have to turn so many times to enter making the route faster and but it may interfere with the smart tracks.
COMMENT CARD

Name: ALAN SCHAEVITZ

Affiliation/Business: MT SAN PEDRO ROAD COALITION

Address: 193 BAYVIEW DR, SR

Email: EMAIL@SCHAEVITZ.ORG

Phone: (415) 459-7568
Comments:

NORTH OF 4TH IS THE BEST OPTION FOR

TRAFFIC FLOW & SAFETY. IT ALSO REMOVES

ANY OBSTRUCTION FROM THE MAJOR TRAFFIC

CORRIDOR TO/FROM EAST S.R. ON PT. SAN PEDRO ROAD.
Name: ALAN SCHNEVITZ

Affiliation/Business: Pt. San Pedro Road Coalition

Address: 193 BAYVIEW DL, S.R.

Email: EMAIL@SCHNEVITZ.ORG

Phone: (415) 459-7568

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

NOT CONSIDERING THE EXISTING TRANSIT CENTER

BLOCK FOR PARKING (OR PARKING IN COMBO WITH OTHER USES) IS A BIG OMISSION AND MISTAKE.
COMMENT CARD

Name: Leslie Simons
Affiliation/Business: San Rafael Heritage
Address: 23 Scenic SR
Email: simons72@comcast.net
Phone: 415-454-1873

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

1. Stony out

2. North of 4th a very cold experience too - seems remote to Station

3. 4th St Gateway - don't move the 5th Ave Vic unless absolutely necessary. US clock worse than before. There are 2 important buildings on the "Boot" south part (tame to Lincoln) okay if the buses are moved off 4th & 38th. The taxic office (tamer) on 4th.

4. Must be preserved - no boot!

5. Across Freeway looks dangerous for pedestrians
COMMENT CARD

Name: Ila Smith

Affiliation/Business: Taxpayer, Voter, Citizen

Address: 26 Villa Awe, San Rafael

Email: ila62530@gmail.com

Phone: 415-436-6342

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

1. Not enough notice of meetings - there were meetings before this one? No notice that I could see. What provisions for parking? 

3. Too crowded for money, need each option explained to 

Peter Anderson
COMMENT CARD

Name: Pat Soberani

Affiliation/Business: Transit rider (no car! In Marin!)

Address: 455 Freitas Pkwy #223 San Rafael CA 94903

Email: m12pat@gmail.com

Phone: 415-300-3047

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

Preferred location is outside Project Area!
Why not consider a block at Irwin/Grand/2nd/3rd? Yes it’s 1 more street to cross for SMART commuters—but they are a small fraction of commuters and riders.
That’s giving more weight to a small number of riders. Instead you’re putting us in unsafe areas and designs—crossing Heatherton!
Waiting under the freeway in Earthquake Country! It’s m a place that’s prone to flooding! Think of us, please!
COMMENTS CARD

Name: Pat Soberanis

Affiliation/Business: Transit Rider (no car! In Marin!)

Address: 455 Freitas Pkwy #223 San Rafael CA 94903

Email: mizpat@gmail.com

Phone: 415-300-3047

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

SAFETY FIRST! Passengers racing from one bus to another at this major transfer point must be protected from traffic on city streets! We look for buses and drivers look for us, so the current protected SRTC is generally safe. Only the two story concept provides similar protection for us. Next best is North of 4th St—but half of the SRTC is under the freeway in earthquake country! Why wasn't the block of Irwin/Grand/2nd/3rd in the project area?
COMMENTS CARD

Name: STAN MAGNON

Affiliation/Business: COMMUTEA: M-F: S-H & S.F.

Address: 29 STH RIVER RD, SF, 94901

Email: 415.606.5777 G MAIIT.COM 0W 2157.

Phone: 415.606.5777

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
Comments:

LOOK AT VANCOUVER CANADA TRANSIT

SEE BEST ANTED TRANSIT SYSTEM IN N. AMERICA

SEE A.L.A.T. = ADVANCED LIGHT RAIL TRAIN

THE A.L.A.T. IS CALLED SKYTRAIN AND IS

ELEVATED TRAIN TRACK

PLEASE CONSIDER ELEVATED TRACK

THROUGH S.M. TO LAKEVIEW FERRY
NAME: Richard Turnbull

Affiliation/Business: 

Address: 40 Robinhood Drive 

Email: theturnbulls@comcast.net

Phone: 415-457-8634

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.
On your project objectives there is no parking.
We need parking — not less — more.

Main concern: Parking.

If it is popular & it already is —
we need parking i.e. access to transportation.

Already not enough, not close enough
not clean & or safe enough — let's fix this.

This meeting was somewhat obtuse.
Like the hand out.
COMMENT CARD

Name: Eric Valls
Affiliation/Business: BUSBANDA!!
Address: 
Email: eric.r.valls@gmail.com
Phone: 

Comments may be submitted following the meeting via email to SRTC@goldengate.org. Comments must be received by Monday, November 19, 2018, in order to be included in the environmental analysis.

P.S. PLEASE LIST UBER & LYFT JUST LIKE CAB COMPANIES BUT WITHOU
Comments:

E.g. The North of Fourth concept would remove existing pkg. I am skeptical of any not reduction of private auto ownership in Marin, thus any reduction in parking may be counter to objectives.

Before the transit ctr, when buses stopped below the tiny, shelter from the elements was better. Riders huddle in the vestibule next to the bathrooms on rainy days. Any future project must include a roof that is not merely ornamental.
STATE AGENCY COMMENTS
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November 30, 2018

Mr. Raymond A. Santiago
Golden Gate Bridge Highway and Transportation District
1011 Anderson Drive
San Rafael, CA 94901-5318

Dear Mr. Santiago:

Subject: San Rafael Transit Center Replacement Project, Notice of Preparation of a Draft Environmental Impact Report, SCH #2018102042, Marin County

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the San Rafael Transit Center Replacement Project (Project) located in Marin County. CDFW office received the NOP on October 24, 2018. On November 20, 2018, the Golden Gate Bridge, Highway and Transportation District (District) provided CDFW an extension to submit comments until November 30, 2018.

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources [Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)]. CDFW is also considered a Responsible Agency if the project would require discretionary approval pursuant to the California Endangered Species Act (CESA), the Native Plant Protection Act, or Fish and Game Code section 1600 et. seq. [Lake and Streambed Alteration (LSA)], or other provisions of the Fish and Game Code that afford protection to the state’s fish and wildlife trust resources. CDFW offers the following guidance as to the scope and content of the environmental information to be included in the EIR, which may include detail about significant environmental issues, reasonable alternatives, and mitigation measures (CEQA Guidelines, §§ 15082 and 15375).

CDFW offers the comments and recommendations below to assist the District in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources associated with the proposed Project.

PROJECT DESCRIPTION
The Project would replace the existing San Rafael Transit Center, also known as the C. Paul Bettini Transit Center, owned by the District, which operates Golden Gate Transit regional and inter-county bus transit services. The transit center is located in downtown San Rafael at the intersection of 3rd and Hetherton Streets. Due to the southward expansion of the Sonoma-Marin Area Rail Transit (SMART) transit system, and the construction of two sets of tracks through the middle of the existing transit center, the transit center must be relocated to another location in downtown San Rafael.

The NOP includes a description of five preliminary Project alternatives to be analyzed in the EIR. CDFW recommends that the EIR identify a preferred alternative, from the preliminary alternatives evaluated and the No Project alternative.
The EIR should incorporate a complete Project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project’s impact to biological resources (CEQA Guidelines, §§ 15124 and 15378). Please include a complete description of the Project components below:

- Footprint area of permanent features and temporarily impacted areas, such as staging areas and access routes.
- Plans for any proposed buildings or structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment types and crew sizes.

Additionally, the EIR should specify if CDFW is anticipated to be a Responsible Agency that is expected to use the EIR in its decision making for the Project [CEQA Guidelines, § 15124, subd. (d)(1)(A)].

ENVIRONMENTAL SETTING
The proposed Project is located on the highly developed downtown area of San Rafael. However, two of the preliminary Project alternatives identified in the NOP require covering portions of Erwin Creek (a tributary to San Rafael Creek). The EIR should quantify the linear feet of creek that would be covered.

Sufficient information regarding the environmental setting is necessary to understand the Project’s, and its alternative’s, (if applicable), significant impacts on the environment (CEQA Guidelines, §§ 15125 and 15360). CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, or endangered species (CEQA Guidelines, §15380).

Habitat descriptions and species profiles should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, and findings from “positive occurrence” databases such as California Natural Diversity Database (CNDDB). Based on the data and information from the habitat assessment, the CEQA document can then adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends that prior to Project implementation surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: https://www.wildlife.ca.gov/Conservation/Survey-Protocol.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (http://www.cnps.org/cnps/rareplants/inventory/), must be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and require the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: https://www.wildlife.ca.gov/Conservation/Plants.
IMPACT ANALYSIS AND MITIGATION MEASURES
The CEQA Guidelines section 15126.2 requires that the EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with Project implementation. This includes evaluating and describing potential impacts such as those listed below.

- “Take” of, and other impacts to, special-status species. For example:
  - Injury or mortality to individuals, or loss or modification of breeding, sheltering, dispersal, and foraging habitat including vegetation removal, alteration of soils and hydrology, and removal of habitat structural features (e.g. burrows, snags, roosts, overhanging banks).
  - Permanent and temporary habitat impacts from ground disturbance (quantified), noise, lighting, reflection, air pollution, traffic or human presence.
- Physical barrier impacts to species movement.
- Degradation or loss of sensitive natural communities and aquatic resources.

CEQA applies to significant project-related environmental impacts, including cumulative impacts. Therefore, a clearly defined threshold by which the significance of impacts is measured is necessary. Appendix G of the CEQA Guidelines identifies significance thresholds for biological resources impacts, including Mandatory Findings of Significance if the Project has the potential to substantially reduce the population or restrict the range of rare, threatened, or endangered species, among other impacts (Pub. Resources Code, §§ 21001, subd. (c) and 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). These thresholds as generally sufficiently comprehensive for biological resources; however, wetlands impacts should also include wetlands that may not be protected under Section 404 of the Clean Water Act.

The EIR also should identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project’s contribution to the impact (CEQA Guidelines, §15355). Although a project’s impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact, for example a reduction of available habitat for a special-status species, should be considered cumulatively considerable.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines sections 15021, 15063, 15071, 15126.2, 15126.4, and 15370 direct the Lead Agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts identified in the EIR. The EIR should discuss take and impact avoidance and minimization measures for special-status species. CDFW, the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service may provide technical assistance on mitigation measure development, as resources are available. Mitigation measures must be incorporated as enforceable project conditions to reduce potential impacts to biological resources to less-than-significant levels or minimize significant impacts as feasible.

Regulatory Requirements
California Endangered Species Act and Native Plant Protection Act
Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project would result in “take” of plants or animals listed under CESA or the Native Plant Protection Act (NPPA), including candidate species, either during construction or over the life of the Project. Issuance of an ITP is subject to CEQA review and documentation. The CEQA document must
specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project may impact CESA listed species, early consultation is encouraged, because significant modification to the Project and mitigation measures may be required for an ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species (CEQA §§ 21001(c), 21083, & CEQA Guidelines §§ 15380, 15064, 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code § 2080.

Lake and Streambed Alteration
CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et. seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

FILING FEES
CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

If you have any questions, please contact Ms. Deborah Waller, Environmental Scientist, at (707) 576-2880 or Deborah.Waller@wildlife.ca.gov, or Ms. Karen Weiss, Senior Environmental Scientist (Supervisory), at Karen.Weiss@wildlife.ca.gov.

Sincerely,

Gregg Erickson
Regional Manager
Bay Delta Region

cc: State Clearinghouse #2018102042
November 20, 2018

Mr. Raymond Santiago, Principal Planner
Golden Gate Bridge, Highway and Transportation District
1011 Anderson Drive
San Rafael, CA 94901

San Rafael Transit Center Replacement Project – Notice of Preparation (NOP)

Dear Mr. Santiago:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission’s (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans’ Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the NOP. Additional comments may be forthcoming pending final review.

Project Understanding
The Golden Gate Bridge, Highway and Transportation District (District), in coordination with the City of San Rafael, Marin Transit, Transportation Authority of Marin (TAM), and Sonoma-Marin Area Transit (SMART), proposes to replace the transit center in downtown San Rafael. The proposed San Rafael Transit Center Replacement Project is needed primarily to preserve and enhance the functionality and effectiveness of the transit center following the implementation of the SMART Phase 2 line to Larkspur and the resulting loss of some of the transit center facilities. A new transit center solution in downtown San Rafael would address near-term and long-term transit needs while improving the desirability and usability of transit for both residents and regional commuters. Regional access to the project site is provided either at southbound US 101/2nd Street or at northbound US 101/Mission Avenue interchanges.

The District has identified five preliminary alternatives described below.

- **Two-Story Concept** includes six bus bays on the ground level and 12 bus bays on the upper level. The Two-Story Concept is bounded by 4th Street to the north, Hetherton Street to the east, 2nd Street to the south, and Tamalpais Avenue to the west.
Across-the Freeway Concept has two options: the first would include a three-bay transit island on Hetherton Street between 3rd and 4th Streets, and the second option would shift Hetherton Street to the west to allow for on-street bays on the east side of Hetherton Street between 3rd and 4th Streets. This concept also incorporates the area underneath US 101, which would eliminate some existing Caltrans Park and Ride stalls and require covering Erwin Creek, a tributary of San Rafael Creek. The Across-the Freeway Concept is bounded 5th Street to the north, Irwin and Hetherton Street to the east, 3rd Street to the south, and Tamalpais Avenue to the west.

4th Street Gateway Concept would accommodate three curbside bus bays and preclude southbound right-turn movements from Hetherton Street to 4th Street. This concept is bounded by 5th Avenue to the north, Hetherton Street to the east, and SMART track to the west.

Whistlestop Block Concept co-locates the proposed transit center on the same block as the existing SMART station. The Whistlestop building would either be relocated, reconfigured, or restored and used for customer service functions with the proposed transit center. This concept is bounded by the 4th to the north, Hetherton Street to the east, 3rd Street to the south, and Lincoln and Tamalpais Avenues to the west.

North of 4th Street Concept would accommodate 17 bus bays within the block and require the customer service center, restrooms, and pick-up/drop-off function area be located offsite. This concept would occupy the entire block of 5th Avenue to the north, Irwin Street to the east, 4th Street to the South, and Hetherton Street to the west. This concept would also eliminate some existing parking stalls in the Caltrans Park and Ride lot and require covering Erwin Creek across the full length of the block.

Operations Analysis
Please submit a Travel Demand Analysis analyzing project-related trip generation, distribution, and turning movements within the STN. The analysis of state facilities is necessary to determine the scope and significance of issues that may arise from the project’s potential conflicts. The California Environmental Quality Act (CEQA) does not exempt these types of operational concerns from evaluation.

Cultural Resources
The project area is extremely sensitive for cultural resources, especially archaeological deposits, as several archaeological sites have been recorded immediately adjacent to the proposed work. As part of the environmental review for the proposed project, pursuant to CEQA Guidelines Section 15064.5, we recommend that the Golden Gate Bridge Highway and Transportation District conduct a cultural resource technical study that at a minimum includes a records search at the Northwest Information Center of the California Historical Resources Information System.
(CHRIS), a field survey of the project area by a qualified archaeologist and a qualified architectural historian, and Native American consultation.

If an encroachment permit is needed for work within Caltrans right-of-way (ROW), we may require that cultural resource technical studies be prepared in compliance with CEQA, Public Resources Code (PRC) 5024, and the Caltrans Standard Environmental Reference (SER) Chapter 2 (http://www.dot.ca.gov/ser/vol2/vol2.htm). Should ground-disturbing activities take place within Caltrans ROW and there is an inadvertent archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and the SER, all construction within 60 feet of the find shall cease and the Caltrans District 4 Office of Cultural Resource Studies (OCRS) shall be immediately contacted.

**Right-of-Way**
Any use of State ROW whether permanent or temporary will require a lease approved by the CTC. Some of the alternatives remove parking spaces from State's park and Ride lots, the loss of these parking spaces and the impacts on surrounding neighborhoods shall be evaluated. New connections to State's owned streets will require an encroachment permits.

**Hydrology**
Please provide calculations to evaluate the effect of covering or modifying Erwin Creek as part of a Caltrans Encroachment Permit application.

**Vehicle Trip Reduction**
In Caltrans’ *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place Type 2 Close-in – Compact Communities**, which are comprised primarily of housing with scattered mixed-use centers and arterial corridors forming the skeleton of the transportation system. Transit is available to connect neighborhoods to multiple destinations, with an emphasis on serving commute trips. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, we encourage the Lead Agency to establish a Transportation Demand Management (TDM) program including the elements described below to promote smart mobility and reduce regional VMT and traffic impacts to the STN.

- Project design to encourage walking, bicycling, and convenient transit access;
- Install secured bicycle storage facilities;
- On-site showers and lockers for active transportation users;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles;

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
• Decrease headway times and improve way-finding on Golden Gate bus routes, Sonoma County Transit bus routes, Marin Transit routes, Greyhound bus routes, and the San Rafael Sonoma-Marin Area Rail Transit (SMART) station.

For additional TDM options, please refer to Chapter 8 of Federal Highway Administration’s *Integrating Demand Management into the Transportation Planning Process: A Desk Reference*, regarding TDM at the local planning level. The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

For information about parking ratios, please see MTC’s report, Reforming Parking Policies to Support Smart Growth, or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking.

**Multimodal Planning**

This project is located within a Priority Development Area (PDA) in the City of San Rafael. Priority Development Areas are identified by the Association of Bay Area Governments as areas for investment, new homes, and job growth. To support PDA goals, the proposed project should provide connections to the existing Class II Bike Lanes on the northwest quadrant of the Hetherton Street/Mission Avenue intersection, as well as bicycle and pedestrian improvements identified in the 2018 *San Rafael Bicycle & Pedestrian Master Plan* within the project site.

We support the recommendations of the ongoing *Tamalpais Avenue Feasibility Study which proposes the creation of a Class IV separated bikeway between West Tamalpais and SMART right-of-way and creates improved bicycle and pedestrian crossings at intersections and connection to existing Class I multi-use path parallel to Hetherton Street.*

**Lead Agency**

As the Lead Agency, Golden Gate Bridge, Highway and Transportation District is responsible for all project mitigation, including any needed improvements to the STN. The project’s financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures, prior to the submittal of an encroachment permit.

**Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit http://www.dot.ca.gov/hq/traffops/developserv/permits/.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Mr. Raymond Santiago, Principal Planner  
Golden Gate Bridge Highway and Transportation District  
November 20, 2018  
Page 5

Should you have any questions regarding this letter, please contact Stephen Conteh at 510-286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

[Signature]

PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review  
c: State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Notice of Preparation

October 16, 2018

To: Reviewing Agencies

Re: San Rafael Transit Center Replacement Project
SCH# 2018102042

Attached for your review and comment is the Notice of Preparation (NOP) for the San Rafael Transit Center Replacement Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Raymond A. Santiago
Golden Gate Bridge Highway and Transportation District
1011 Andersen Dr
San Rafael, CA 94901-5318

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency
Golden Gate Bridge, Highway and Transportation District, in coordination with the City of San Rafael, Marin Transit, Transportation Authority of Marin (TAM), and Sonoma-Marin Area Rail Transit (SMART), plans to replace the transit center in downtown San Rafael. The proposed San Rafael Transit Center Replacement Project is needed primarily to preserve and enhance the functionality and effectiveness of the transit center following the implementation of the SMART Phase 2 line to Larkspur and the resulting loss of some of the transit center facilities. A new transit center solution in downtown San Rafael would address near-term and long-term transit needs while improving the desirability and usability of transit for both local residents and regional commuters.
Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: San Rafael Transit Center Replacement Project

Lead Agency: Golden Gate Bridge, Highway and Transportation District
Contact Person: Raymond A. Santiago
Mailing Address: 1011 Andersen Drive
Phone: (415) 257-4443
City: San Rafael, CA Zip: 94901-5318
County: Marin County

Project Location: County/Marin County City/Nearest Community: San Rafael
Cross Streets: Various including but not limited to Hetherton Street, 4th Street, 5th Avenue, Irwin Street Zip Code: 94901
Longitude/Latitude (degrees, minutes and seconds): ° ‘ ” N / ° ‘ ” W Total Acres:
Assessor's Parcel No.:
Section:
Twp.:
Range:
Base:
Within 2 Miles: State Hwy #: 101
Waterways: San Rafael Creek
Airports:  
Railways: SMART
Schools: San Rafael High School

Document Type:

CEQA:  [ ] NOP  [ ] Early Cons  [ ] Neg Dec  [ ] Mit Neg Dec  [ ] Draft EIR  [ ] Supplement/Subsequent EIR  [ ] NEPA:  [ ] NOI  [ ] Other:  [ ] Joint Document  [ ] Final Document
[ ] Other:  

Local Action Type:

[ ] General Plan Update  [ ] Specific Plan  [ ] Rezone  [ ] OCT 16 2018  [ ] General Plan Amendment  [ ] Master Plan  [ ] Prezone  [ ] Coastal Permit  [ ] General Plan Element  [ ] Planned Unit Development  [ ] Use Permit  [ ] Redevelopment  [ ] Community Plan  [ ] Site Plan  [ ] Other:  [ ] Other:  

Development Type:

[ ] Residential:  Units  Acres  Employees  [ ] Transportation:  Type Transit Center Replacement  [ ] Mining:  Mineral  [ ] Power:  Type MW
[ ] Office:  Sq.ft.  Acres  Employees
[ ] Commercial:  Sq.ft.  Acres  Employees
[ ] Industrial:  Sq.ft.  Acres  Employees
[ ] Educational:
[ ] Recreational:
[ ] Water Facilities: Type MGD  [ ] Waste Treatment: Type MGD  [ ] Hazardous Waste: Type

Project Issues Discussed in Document:

[ ] Aesthetic/Visual  [ ] Fiscal  [ ] Recreation/Parks  [ ] Vegetation
[ ] Agricultural Land  [ ] Flood Plain/Flooding  [ ] Schools/Universities  [ ] Water Quality
[ ] Archeological/Historical  [ ] Geologic/Seismic  [ ] Sewer Capacity  [ ] Wetland/Riparian
[ ] Biological Resources  [ ] Noise  [ ] Soil Erosion/Compaction/Grading  [ ] Growth Inducement
[ ] Coastal Zone  [ ] Population/Housing Balance  [ ] Solid Waste  [ ] Land Use
[ ] Drainage/Absorption  [ ] Public Services/Facilities  [ ] Toxic/Hazardous  [ ] Cumulative Effects
[ ] Economic/Jobs  [ ] Traffic/Circulation  [ ] Other:

Present Land Use/Zoning/General Plan Designation:

Hetherton Office

Project Description: (please use a separate page if necessary)
Golden Gate Bridge, Highway and Transportation District, in coordination with the City of San Rafael, Marin Transit, Transportation Authority of Marin (TAM), and Sonoma-Marin Area Rail Transit (SMART), plans to replace the transit center in downtown San Rafael. The proposed San Rafael Transit Center Replacement Project (project) is needed primarily to preserve and enhance the functionality and effectiveness of the transit center following the implementation of the SMART Phase 2 line to Larkspur and the resulting loss of some of the transit center facilities. A new transit center solution in downtown San Rafael would address near-term and long-term transit needs while improving the desirability and usability of transit for both local residents and regional commuters.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010
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<tr>
<th>Resources Agency</th>
<th>Native American Heritage Comm.</th>
<th>SCH#</th>
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<td>Debbie Treadway</td>
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<td>Dept. of Boating &amp; Waterways</td>
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<td>Denise Peterson</td>
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Other Departments:
- California Department of Education
- OES (Office of Emergency Services)
- Food & Agriculture
- Dept. of Fish & Wildlife M
- Caltrans, District 1
- Caltrans, District 2
- Caltrans, District 3
- Caltrans, District 4
- Caltrans, District 5
- Caltrans, District 6
- Caltrans, District 7
- Caltrans, District 8

Independent Commissions, Boards:
- Delta Protection Commission
- Delta Stewardship Council
- California Energy Commission
- Caltrans, District 1
- Caltrans, District 2
- Caltrans, District 3
- Caltrans, District 4
- Caltrans, District 5
- Caltrans, District 6
- Caltrans, District 7
- Caltrans, District 8
- Caltrans, District 9
- Caltrans, District 10
- Caltrans, District 11
- Caltrans, District 12

Other:
- Regional Water Quality Control Board (RWQCB)
- RWQCB 1
- RWQCB 2
- RWQCB 3
- RWQCB 4
- RWQCB 5
- RWQCB 6
- RWQCB 7
- RWQCB 8
- RWQCB 9
- Other

Conservancy

Last Updated 5/22/18
November 15, 2018

Raymond A. Santiago
Golden Gate Bridge, Highway and Transportation District
1011 Andersen Drive
San Rafael, CA 94901

Re: San Rafael Transit Center Replacement Project
SCH 2018102042 — Notice of Preparation

Dear Mr. Santiago:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission’s Rail Crossings Engineering Branch (RCEB) is in receipt of the Notice of Preparation (NOP) for the proposed San Rafael Transit Center Replacement Project (Project). Golden Gate Bridge, Highway and Transportation District (District) is the lead agency.

The District, in coordination with the City of San Rafael (City), Marin Transit, Transportation Authority of Marin (TAM), and Sonoma-Marin Area Rail Transit (SMART), proposes to replace the transit center in downtown San Rafael. The proposed Project is needed to preserve the functionality and effectiveness of the transit center after implementation of the SMART Phase 2 line to Larkspur, resulting in loss of some transit center facilities.

Five preliminary project alternatives are presented in the NOP to be analyzed in the Draft Environmental Impact Report (DEIR); the District will also study an additional No Project alternative pursuant to CEQA requirements. The five project alternatives are generally bounded by 2nd Street to the south, 5th Street to the north, Tamalpais Avenue to the west, and Hetherton Street to the east, centered around the SMART San Rafael station.

The proposed project alternatives would impact the rail crossings at
- 2nd Street (CPUC No. 005-16.89, DOT No. 863522F),
- 3rd Street (CPUC No. 005-16.90, DOT No. 863521Y),
- 4th Street (CPUC No. 005-17.00, DOT No. 863520S); and
- 5th Street (CPUC No. 005-17.05, DOT No. 863519X).

The Commission has authorized improvements to be made at the 2nd Street and 3rd Street crossings through GO-88B applications for each respective crossing. Construction is authorized until April 25, 2020 for the 2nd Street crossing and June 4, 2020 for the 3rd Street crossing.

The 4th Street and 5th Street crossings have been recently improved with new warning devices, pedestrian treatments, and queue-cutter signals. The 4th Street crossing is currently equipped with two Commission Standard 9-A (flashing light signal assembly with automatic gate arm and additional flashing light signals over the roadway on a cantilevered arm) warning devices and two Commission Standard 9-E (flashing light signal assembly with automatic gate installed on the departure side of the at-grade crossing, also known as an exit gate) warning devices for vehicular traffic, and two Commission Standard 9 (flashing light signal assembly with automatic gate arm) warning devices for pedestrians crossing along the south. The 5th Street crossing is currently equipped with two Standard 9-A warning devices and two Standard 9-E warning devices. The 4th
Street and 5th Street crossings are a part of the Combined Novato, Marin County and San Rafael Quiet Zone.

Four of the proposed preliminary project alternatives would impact the 3rd Street crossing with addition of driveways into the new Transit Center. Three of the proposed project alternatives (Across-the-Freeway Concept, 4th Street Gateway Concept, and and Whistleblock Concept) would alter the 4th Street and/or 5th Street crossings with additions of bike path or crosswalks. Removal and replacement of the existing transit center between 2nd Street and 3rd Street would also affect the 2nd Street crossing and the 3rd Street crossings.

Construction or modification of public crossings requires authorization from the Commission. RCEB representatives are available to discuss any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project’s development. More information can be found at: http://www.cpuc.ca.gov/crossings.

If you have any questions, please contact Matt Cervantes at (213) 266-4716, or mci@cpuc.ca.gov.

Sincerely,

[Signature]

Matt Cervantes
Utilities Engineer
Rail Crossings Engineering Branch
Safety and Enforcement Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
October 26, 2018

Raymond A. Santiago
Golden Gate Bridge Highway and Transportation District
1011 Andersen Dr.
San Rafael, CA 94901-5318

RE: SCH# 2018102042 San Rafael Transit Center Replacement Project, Marin County

Dear Mr. Santiago:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC’s recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.
AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
   d. A “California Native American tribe” is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. **Begin Consultation Within 30 Days of Receiving a Tribe’s Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subsd. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
   a. For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code §65362.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. **Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. **Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project’s impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. **Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. **Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency’s environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).
7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
   a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
   b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. **Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
    a. Avoidance and preservation of the resources in place, including, but not limited to:
       i. Planning and construction to avoid the resources and protect the cultural and natural context.
       ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
       i. Protecting the cultural character and integrity of the resource.
       ii. Protecting the traditional use of the resource.
       iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC’s PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf
SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18’s provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).

2. **No Statutory Time Limit on SB 18 Tribal Consultation:** There is no statutory time limit on SB 18 tribal consultation.

3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city’s or county’s jurisdiction. (Gov. Code §65352.3 (b)).

4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
   a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
   b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and “Sacred Lands File” searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

**NAHC Recommendations for Cultural Resources Assessments**

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. **Contact the appropriate regional California Historical Research Information System (CHRIS) Center** (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
   a. If part or all of the APE has been previously surveyed for cultural resources.
   b. If any known cultural resources have already been recorded on or adjacent to the APE.
   c. If the probability is low, moderate, or high that cultural resources are located in the APE.
   d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
   a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
   b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subsds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Sharaya.Souza@nahc.ca.gov.

Sincerely,

[Signature]

Sharaya Souza
Staff Services Analyst

cc: State Clearinghouse
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REGIONAL/LOCAL AGENCY COMMENTS
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November 8, 2018

Raymond Santiago, Principal Planner
Golden Gate Bridge, Highway & Transportation District
1011 Andersen Drive
San Rafael, CA 94903

Subject: San Rafael Transit Center Relocation Project; City of San Rafael Comments on Notice of Preparation (NOP)

Dear Mr. Santiago:

This letter is to advise you that the City of San Rafael (City) has received the Notice of Preparation (NOP) for the San Rafael Transit Center Relocation Project (SRTC). The NOP requests comments on the scope of topic areas to be studied in an Environmental Impact Report to be prepared for this project. Per the Memorandum of Understanding (MOU) between the City and the District (October 27, 2017), the City is a “Responsible Agency” in this environmental review process. Pursuant to CEQA Guidelines Section 15096, as a Responsible Agency, the City is required to comment on the NOP.

The City has reviewed the NOP finding that it is well written and identifies a broad scope of topic areas to be studied in the EIR. On November 5, 2018, the San Rafael City Council reviewed the NOP and a report from our Community Development Department. Following discussion and public testimony, the City Council, on a 5-0 vote adopted Resolution 14599 (attached) supporting the recommendations presented in the report with some additions. The City respectfully submits the following comments on the NOP. Please note that the City comments are presented by topic area. Further, since a defined project location has not been determined at this time as the primary project for study in the EIR, the City has defined the “project” as the SRTC project study area and the five site options (alternatives) that have been presented in the NOP.

A. Setting – History & Background
   The NOP has clearly stated events leading to the required relocation of the SRTC.

   Recommendation: The EIR section describing the setting, history/background and project location (study area) should acknowledge that this area of San Rafael has been substantially impacted by historic regional transportation activities including: rail; elevation of Highway 101 over city streets; and modifications of San Rafael, Mahon and Irwin Creeks for commercial purposes. It is the priority of the City to remedy these long-standing impacts by developing a transit center that compliments the gateway to Downtown, enhances resources, and maximizes efficient and safe movement of vehicles, bicyclists and pedestrians.
B. Project Objectives

The NOP includes a clear list of "Project Objectives" and the purpose of the SRTC project have been clearly stated.

Recommendation: The project objectives should expressly state the City’s key design goals presented in the San Rafael Transit Center Guidance Report, which was prepared by the City in February 2018. This report is attached. The City's five key design goals for this project are as follows:

1. Maximize 4th Street vitality;
2. Clearly define the SRTC access routes;
3. Improve utilization of the Caltrans right-of-way (under the US 101 overpass);
4. Demonstrate sustainable design; and
5. Preserve the Whistlestop building (930 Tamalpais Avenue).

As the SRTC project is a catalyst in planning for the future of Downtown San Rafael (San Rafael General Plan 2040 and Downtown Precise Plan) and the City will take a formal action on the SRTC project, it is critical that the City's design goals are incorporated. The District should also refer to the City's recently accepted report on "Good Design" Guidelines for Downtown. These guidelines are available on the City's website, which can be accessed at: https://storage.googleapis.com/proudcity/sanrafaelca/uploads/2018/02/Downtown-Design-Committee-PP-Final-5ii18.pdf

C. Aesthetics

The SRTC project has the potential to degrade the existing scenic character or quality of the study area and the surrounding area. The NOP states that visual character will be assessed and the EIR will analyze key visual resources and scenic views.

Recommendation: The project study area is the gateway to Downtown San Rafael. The visual prominence of a transit center could dramatically impact the visual character of the studied site, the surrounding study area and the gateway appearance to Downtown. While the NOP states that visual character will be assessed, there are no specifics provided on the extent or scope of this assessment. First, the analysis of aesthetics should utilize the San Rafael General Plan 2020 (which includes the San Rafael Downtown Vision), the San Rafael Transit Center Relocation Guidance Report (referenced above and attached) and the "Good Design" Guidelines for Downtown as a starting point for determining key goals and policies that are pertinent to design. Second, the EIR should include the preparation of computer-generated visual simulations for the site options identifying existing and post-development conditions. The District should provide public opportunities to review architectural renderings prior to issuance of a Draft EIR.

The project has the potential to result in new sources of light and glare.

Recommendation: The EIR should include: a) a qualitative analysis of glare associated with vehicles, buses and window glazing at the studied site; and b) an
analysis of additional light sources for evening illumination associated with exterior lighting for the SRTC and vehicle/bus lights.

D. **Air Quality**
The project has the potential to: a) result in new or altered sources of air contaminants; b) expose sensitive receptors to substantial pollutant concentrations; and c) create objectionable odors affecting a substantial number of people. The NOP states that the EIR will describe the air quality conditions and evaluate the impacts of the project in accordance with the Bay Area Air Quality Management District’s CEQA Guidelines.

**Recommendation:** Existing residences in the study area have the potential to be exposed to additional pollutants and health hazards associated with project vehicle emissions and idling. The EIR should include the preparation of a quantitative air quality analysis. Further, the EIR should include the preparation of a health risk assessment as all the site options would be located closer to existing residential uses (sensitive receptors) than the current SRTC site.

E. **Biological Resources**
Two of the site options (Across-the-Freeway Concept & North of 4th Street Concept) have the potential to adversely impact: a) federally-protected wetlands as defined by Section 404 of the Clean Water Act; and b) the movement of native resident or migratory fish or wildlife.

**Recommendation:** As stated, two of the site options in the study area have the potential to impact (cover) existing tidal wetlands. The tidal wetlands may be subject to the jurisdiction of the US Army Corps of Engineers per Section 404 of the Clean Water Act. It is recommended that a Corps jurisdictional determination be prepared to determine the boundaries of the wetland. A qualified biologist should be retained to assess the biological resources in and around the tidal wetlands, and the potential impacts. As a Responsible Agency, the City requests that the District initiate an early consultation meeting with the appropriate regulatory agencies to discuss the tidal wetlands and potential impacts of the site options. Such meetings are regularly-hosted by the County of Marin Public Works Department.

The site options have the potential to adversely impact General Plan 2020 goals and policies that reinforce the protecting of biological resources (heritage street tree removal; wetlands).

**Recommendation:** As noted above, two of the site options in the study area (Across-the-Freeway Concept & North of 4th Street Concept) have the potential to impact (cover) existing tidal wetlands. A qualified biologist should be retained to assess biological resources and potential impacts associated with the development. Second, several of the site options have the potential to damage or destroy mature trees (e.g., mature street trees). All significant trees within the study area that have the potential of being removed or impacted by one or more of the site options should be identified and assessed by a qualified arborist. Further, the trees should be assessed by a qualified biologist to determine potential wildlife habitat value and appropriate mitigation.
F. Cultural Resources

The project has the potential to cause a substantial adverse change in the significance of a historic resource as defined by CEQA Guidelines Section 15064.5. The NOP states that the EIR will include an assessment of potential impacts on historic resources.

Recommendation: Downtown San Rafael is developed with many older buildings. Some of these buildings qualify as a historic resource as defined by CEQA Guidelines Section 15064.5. At present, the City relies on the San Rafael Historical/Architectural Survey – Final Inventory List or Structures and Areas, which was prepared for the City in 1977 (updated in 1986). This survey is on file with the Community Development Department. The following buildings/properties are listed in this survey and are considered potential historic resources:

- 930 Tamalpais Avenue (Whistlestop)
- 927 Tamalpais Avenue (Trevor's)
- 709 4th Street (4th Street Tavern)
- 633 5th Avenue
- 637 5th Avenue

These properties should be assessed by a qualified architectural historian to: a) confirm if they meet the CEQA Guidelines historic resource criteria; and b) determine potential impacts for developing the site options. In addition, it is recommended that the architectural historian complete a reconnaissance of the study area to determine if there are other existing buildings that may meet the historic resource criteria and could be impacted by development of the site options. The study should also evaluate possible relocation of identified historic structures and identify mitigations if included.

The project has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. The NOP states that the EIR will include an assessment of potential impacts to archaeological resources.

Recommendation: Downtown San Rafael has an abundance of known and registered pre-historic and archaeological sites. According to Pastfinder, the City's Archaeological Sensitivity Map database, the study area is rated in the categories of "High Sensitivity" and "Medium Sensitivity." City Council Resolution No. 10980 (December 3, 2001) sets forth procedures and regulations for archaeological resource protection. For the high and medium sensitivity areas, the procedures require that a qualified archaeologist prepare a report to identify potential resources and identify measures for resource protection. Therefore, it is recommended that a qualified archaeologist be retained to complete such a report for the EIR. Further, tribal consultation with the appropriate Native American tribe is required per SB52.
G. **Geology, Soils, Seismicity**

The project has the potential to be located on a site that contains landfill soil conditions with possible seismic risk. The NOP states that geologic and soil conditions will be assessed to address potential seismic risk and liquefaction.

*Recommendation:* The City supports the NOP recommendations to assess geologic and soil conditions. As the study area: a) contains landfill; b) portions are historic marshland; and c) is within Geo-Seismic Zones 3 and 4 (high-risk), it is recommended that the EIR include the preparation of a Geotechnical Investigation, which would include subsurface borings and soil testing.

H. **Greenhouse Gas Emissions**

The project has the potential to generate greenhouse gas (GHG) emissions. The NOP states that potential construction and operation GHG emissions will be quantified and assessed.

*Recommendation:* The City supports the NOP recommendations to assess GHG emissions. An update to the City's Climate Change Action Plan (CCAP) was recently completed and presented to the City Council. Although the plan has not yet been adopted by the City Council, it is expected that the City Council will adopt it in early 2019. The CCAP will be accompanied by an update to the adopted GHG Emissions Reduction Strategy. The City recommends that the updated CCAP and reduction strategy be used in assessing GHG emissions for this project.

I. **Hazards & Hazardous Materials**

The project has the potential to be located on a site which contains contaminated soil and/or groundwater. The NOP states that existing soil and groundwater conditions will be assessed for potential hazardous materials or contaminants.

*Recommendation:* The City supports the NOP recommendations to assess hazards and hazardous materials. A Phase I Site Assessment is recommended, which would confirm listed sites or properties within the study area that have known contaminants. One source that is available is the *Phase I Hazardous Waste Initial Site Assessment (ISA) for the Canalfront Conceptual Design Plan*, October 10, 2008. This assessment is available and on file with the Community Development Department.

J. **Hydrology & Water Quality**

The project has the potential to: a) violate water quality standards; and b) substantially alter the existing drainage pattern of the site or area. Further, the study area is located within the FEMA 100-year flood zone and is vulnerable to sea level rise. The NOP states that project flooding will be assessed in addition to storm water runoff, drainage infrastructure and water quality. However, the NOP does not mention or discuss assessing the potential for sea level rise.

*Recommendation:* The City supports the NOP recommendations to assess hydrology and water quality. It is recommended that EIR assess the potential risk associated with projected sea level rise.
K. **Land Use & Planning**

The project has the potential to conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The NOP states that the EIR will evaluate: a) the compatibility of the project with the neighboring areas; b) change to or displacement of existing uses; c) compliance with the zoning regulations; and d) consistency with the relevant land use policies that are adopted in the San Rafael General Plan 2020, and the recommendations of the San Rafael Downtown Station Area Plan.

*Recommendation:* The City supports the NOP recommendations. However, the City recommends that this assessment be expanded to include the San Rafael Transit Center Relocation Guidance Report (referenced above and attached) and the “Good Design” Guidelines for Downtown. While the San Rafael General Plan 2040 and Downtown Precise Plan are in the early stages of planning, the EIR should include a discussion of the SRTC project’s relationship to these plans, and the status of these plans at the time of Draft EIR publication.

L. **Noise**

The project has the potential to result in significant construction-related noise and new long-term operation-related noise to sensitive receptors (residences). The NOP states that both construction-related and operational noise and vibration impacts will be assessed in the EIR.

*Recommendation:* The City supports the recommendation to assess these potential impacts. The NOP does not disclose if project construction will/could require pile-driving. The EIR should disclose if pile-driving is necessary (or proposed) for construction and the noise and vibration impacts should be assessed. The noise assessment should include field measurements of existing baseline conditions.

M. **Population & Housing**

The project has the potential to induce population growth. Further, several of the site options have the potential to displace housing and/or people necessitating the construction of replacement housing elsewhere. The NOP states that potential growth-inducing impacts and housing displacement will be assessed in the EIR.

*Recommendation:* The City supports the recommendation to assess these potential impacts. It is recommended that the District staff closely work with City staff to assess both topic areas to ensure that the project is consistent with the San Rafael General Plan 2020 and related plans, including the Plan Bay Area 2040 growth projections for the Downtown Priority Development Area (PDA).

N. **Utilities, Public Services & Recreation**

The project has the potential to impact existing utilities (existing and planned services), public services (e.g., essential services response times and service ratios), and recreation within the study area. The NOP states that physical impacts on public facilities will be assessed, including existing water supply. However, the NOP does not address assessing potential impacts to public services and recreation.
Recommendation: The City recommends that the scope of study be expanded to address public services and recreation. Essential service response times and ratios should be analyzed. Regarding recreation impacts, a review of potential, public realm impacts and opportunities within a ¼ mile radius of the project site should be included. Public facilities serving regional populations generate the need for associated public realm improvements, such as wider sidewalks, gathering areas, wayfinding signage, and landscaping.

O. Transportation & Transit
The five site options have the potential to: a) impact the performance of the circulation system for all modes of transportation including intersections, arterials/streets, US 101, pedestrian and bicycle path, and mass transit; b) result in an increase in hazards due to the specific design features; c) result in inadequate emergency access; and d) conflict with City-adopted policies, plans and programs for bicycles and pedestrian facilities that could decrease the performance and safety of these facilities. The NOP states that a transportation impact analysis will be prepared for the EIR.

Recommendation: The City supports the recommendation to prepare a transportation impact analysis. City staff has been coordinating with the District traffic engineering consultants to define the scope of this analysis for assessing level of service (LOS) including the intersections and arterials for study. The City recommends that the following additional studies/analyses be completed and incorporated into the EIR:

1. An assessment of ‘vehicle miles traveled.’
2. Review of emergency access and response times for service to the SRTC
3. Review and assessment of the bicycle and pedestrian network serving the study area for potential hazards and safety impacts associated with design features such as site access, visual obstructions and location of crosswalks.
4. Review for project consistency and/or conflicts with the circulation goals and policies set forth in the San Rafael General Plan 2020 and City of San Rafael Pedestrian and Bicycle Master Plan (2018).
5. Review of advanced signalization and other technological management system opportunities should be included for each design concept.
6. Given rapidly expanding and evolving mobility options and technologies, include a review of transit adaptation opportunities in the vicinity of the selected transit center site, including recommendations for corresponding land use.
7. It is requested that the traffic study place particular attention on the east/west vehicular circulation within and around the study area during peak periods of traffic.

P. Alternatives
CEQA Guidelines Section 15126.6 requires that an EIR describe a reasonable range of 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. The NOP states that the five site options listed above in addition to a “No Project” alternative will be analyzed in the EIR.
Recommendation: Except as noted below, the five site options present a reasonable range of alternatives appropriate for study in the EIR. As a Responsible Agency, it is recommended that the City meet with the District to confirm the evaluation criteria that will be used to assess finalize the alternatives for further study. In addition, the following is recommended:

1. The City has previously expressed objection to the Two-Story Concept (Attachment 2, Figure 2) because of its impact on the Interim Center, its cost, and the visual impacts of crossing 3rd Street. The City has also expressed objection to the 4th St. Gateway Concept (Attachment 2, Figure 4) because of its impacts on: existing traffic circulation; 4th St. vitality; and Downtown gateway character. The District should undertake an initial screening of the five site location options to eliminate from further consideration those concepts that do not meet the Project Objectives.

2. The City has previously expressed objection to use of 3rd St. for bus bays in the Whistlestop Block Concept (Attachment 2, Figure 5). Alternatives within the identified study boundary for this block should illustrate internal vehicle circulation to access all properties within the block as well as potential land uses on remainder of parcels incorporated into the project. Future Whistlestop site ownership and management options should be analyzed.

3. The North of 4th Street Concept (Attachment 2, Figure 6) was developed and included at the request of the City. Prior to Figure 6 being developed by the District, the City provided a concept sketch, which included all use and improvement elements that have been programmed for transit center planning. The City was disappointed to see that the District's Figure 6 varies from the City proposal by eliminating key ancillary facilities from the site and providing a public sidewalk on its western boundary. There is no explanation as to why these elements were not included, but the scope merely states that they would be accommodated off-site. The City recommends that the District should carefully analyze the site to find a way to accommodate these ancillary facilities as they are critical to providing a full-service transit center. Further evaluation should be undertaken before accepting the District’s assumptions for this site. (Note: District information provided at the June 12, 2018 public meeting incorrectly stated that this concept had been eliminated from further consideration.)

4. The District statement regarding features common to all five site location options do not include public restrooms or space for possible concessions. Each of these is provided in the existing facility and should be considered “required”.

5. Where the site location option results in or requires partial condemnation/purchase of private property, the Alternatives analysis should identify potential land uses on the remainder portions. Also, future re-use options of the current SRTC site should be included in the Alternatives analysis.

6. In analyzing the alternatives, both economic and real estate development in and around the study area need to be carefully reviewed and considered.
Q. **Non-CEQA Topics Recommended for Study**

In addition to above, the City recommends that the following non-CEQA-related topic areas be studied and be made available for public review with the Draft EIR:

1. Fiscal Impacts of the Project and Alternatives. Each alternative involves purchase of private property (possible condemnation); site improvements and construction costs that vary; and clearances/permits from other regulatory agencies. A Fiscal Impact Analysis will assist in assessing and weighing the ultimate project and alternatives.

2. Short-term and Long-term Parking Assessment. No mention is made regarding potential loss of short and long-term parking for the various site options/alternatives. Potential parking impacts should be evaluated for each alternative. Measures to accommodate/retain parking should be included in this assessment.

Thank you again for the opportunity to comment on the NOP. Should the District have any questions about our comments, please feel free to contact Paul Jensen, Community Development Director at 415-485-5064 or email at paul.jensen@cityofsanrafael.org.

Sincerely,

[Signature]

Gary C. Phillips
CITY OF SAN RAFAEL
Mayor

Resolution 14599
San Rafael Transit Center Relocation Guidance Report, prepared by City of San Rafael; February 2018

cc: City Councilmembers
Jim Schutz, City Manager
Bill Guerin, Public Works Director
Steve Kinsey, ALTA
Paul Jensen, Community Development Director
Lisa Goldfien, Assistant City Attorney
SAN RAFAEL TRANSIT CENTER RELOCATION GUIDANCE REPORT

City of San Rafael

February 13, 2018
SAN RAFAEL TRANSIT CENTER RELOCATION GUIDANCE REPORT

INTRODUCTION
San Rafael looks forward to a successful collaboration with the Golden Gate Bridge District, its transit partners, transit users, and our community to plan and build an outstanding new transit center that improves regional transit mobility while also contributing to Downtown San Rafael’s prosperity, vitality, and civic pride.

For a quarter century, the City has steadfastly embraced the focus of our Downtown Vision, and that remains so. The City values our Downtown being connected regionally with quality transit options.

At the same time, we recognize that the relocated transit center’s impacts and influence will extend far beyond its specific site, warranting a clear demonstration of how the solution furthers our Vision, respecting existing neighborhood context while also contributing to the emergence of a more inviting gateway into Downtown.

In fulfillment of the Downtown Vision, numerous City-adopted plans and studies provide substantial direction and detailed guidance. They will form the City’s basis of review as the process of identifying a preferred option moves forward.

THE IMPORTANCE OF THE 4TH OPTION

The 2016 Kimley-Horn Transit Center Relocation Study identified three alternatives to be further evaluated and refined for additional consideration as part of the Bridge District’s study. The City is concerned that none of these alternatives will adequately achieve the City’s goals for this neighborhood.

To address this, the City asked the Bridge District to identify a 4th Option before initiating Environmental Review, and to actively engage our community in its development. We appreciate their willingness to do so. This Guidance Report identifies the City’s primary area of concern associated with relocation of the transit center. It also highlights key improvements the City is seeking in the 4th Option.

2/13/18
DEFINING A TRANSIT HUB FOCUS AREA

To successfully integrate with the existing Downtown and contribute to a neighborhood renaissance, transit center relocation planning and design must extend beyond its specific site.

The City has identified a Transit Hub Focus Area extending ¼ mile circle around the existing SMART station. This area is within easy walking distance for most transit users, and includes the retail core, the area under 101, and private property zoned for mix use development.

All forms of mobility within the Hub Focus Area require careful attention, and intersection analyses will need to extend beyond the boundary.

For the transit center to successfully integrate with the Downtown, public gathering spaces within and adjacent to it, lighting, landscaping, wayfinding, and other distinguishing features will be included in District plans.
VISION FOR THE HUB FOCUS AREA

The Transit Hub Focus Area will be a vibrant, prosperous neighborhood, welcoming both residents and visitors with a memorable sense of arrival. Our diverse cultural heritage and historic neighborhoods will be respected, while encouraging infill development that expresses fresh ideas and urban form.

4th St. will remain our retail backbone, extending its pedestrian-friendly hometown sense of place beneath the 101 viaducts. SMART riders' approaching or departing the Downtown station will enjoy a "shady lane" feeling between Mission and 2nd St.

Caltrans' right-of-way beneath 101 will be visually transformed using creative lighting, artwork, street vendors, and landscaped pathways alongside a healthy, restored creek. Bus stop or parking improvements will increase the functional use of the land.

The entire Transit Hub Focus Area will be interconnected along broad, inviting, tree-lined sidewalks teeming with vitality both day and night.

People will stay, rather than simply pass through the area. Bicyclists and pedestrians will come and go along safe, well-defined routes and find abundant bike parking and bike share opportunities near the transit stations.

Excellent transit connections, functioning in concert with traffic-calmed streets will keep auto traffic moving efficiently. Curbside “Last mile” pick-up and drop-off will be close by, with both car share opportunities and easily identified short-term and all-day parking available within walking distance.

The transit center will be clean, safe, well-lit and designed to become an enduring neighborhood landmark. It will reflect the City's pursuit of sustainability in its design and operation, and forward-thinking adaptability. Attractive onsite and nearby public gathering opportunities will benefit transit riders and residents living in a variety of new housing types over shops and businesses.
KEY 4th OPTION ELEMENTS

The Bridge District has agreed to work with City staff and our residents to develop a 4th Option for relocating the bus transit center. To focus the design process, the City has identified five key design goals for the 4th Option alternative.

MAXIMIZE 4TH STREET VITALITY
CLEARLY DEFINE TRANSIT CENTER ACCESS ROUTES
IMPROVE UTILIZATION OF THE CALTRANS RIGHT-OF-WAY
DEMONSTRATE SUSTAINABLE DESIGN
PRESERVE THE WHISTLESTOP BUILDING

A brief description of detailed aspects of these elements follows.

MAXIMIZE 4TH STREET VITALITY

1- Foster 4th Street’s "main street" feeling between Lincoln and Irwin. Accommodate broader tree-lined sidewalks with fewer vehicle crossings, unique, street-facing storefronts and inviting public space, adequately sized to allow outdoor dining, family fun, community events, and people watching.

2- Respect the City's mid-term goal to eliminate vehicle access from 4th St. north onto both West and East Tamalpais, expanding opportunities for public space.

3- Continue preventing vehicle access into Caltrans' parking lot on the north side of 4th St., to maximize pedestrian safety.

4- Identify the safest, most convenient bikeway crossing location of Fourth St. at W. Tamalpais.

5- Prevent permanent 4th St. bus stops under the freeway to allow for safer shared use of the roadway.

6- Limit any 4th St. transit center driveways to the minimum width necessary, with excellent sight lines.

7- The 4th St. intersection at Hetherton is a priority location for gateway elements, including signature landscaping, artwork, wayfinding signage, electronic message boards and specialty lighting.
CLEARLY DEFINE TRANSIT CENTER ACCESS ROUTES
All east-west downtown access streets between Mission and 2nd St shall be kept open.

1- Within the Hub Focus Area, prioritize pedestrian safety. Identify preferred transit center access routes for student and Canal transit riders.

2- Minimize rider transfer times for rail and bus services.

3- Design adaptive Last Mile pick up and drop off locations for a minimum of 10 vehicles.

4- Identify preferred nearby public or private replacement parking space locations for all displaced existing spaces, plus an additional 60 parking spaces serving regional transit users.

5- North-south transit center access for bikes, between Mission and 2nd St., will be from a two-way Class IV bikeway on W. Tamalpais

6- Anticipate a landscaped pathway on the east side of Hetherton between Mission and 3rd St. where feasible.

7- Wayfinding elements should be integrated into the project, and complementary to the building design.

8- Incorporate traffic signalization and other technological methods to increase bus movement efficiency.

9- Safe, inviting mid-block pedestrian routes to the transit center should be provided, where possible.
IMPROVE UTILIZATION OF THE CALTRANS RIGHT-OF-WAY

1- Transformation of the Caltrans property will increase transit center safety and use. Identify modifications that will benefit the project and the overall improvement of the neighborhood.

2- Explore increasing the efficiency of Caltrans' land use under the freeway by either creating a safe, inviting transit center or expanding parking capacity using vertical lift parking systems.

3- The area under the raised freeway structures should be redeveloped to increase the visual appeal and unique sense of Gateway arrival into the Downtown. Include elements such as identity graphics, artwork, creek restoration, landscaped plazas and sitting areas, historic markers, electronic message signs, special effect lighting, and food trucks and kiosk vendors.

4- Include more street trees on both sides of this roadway to add visual relief and calm traffic. Accommodate landscaping within Caltrans' right-of-way on the eastern frontage of the existing Bettini Transit Center if Hetherton bus pads are discontinued.

5- Create an attractive landscaped terminus adjacent to the SB 101 on-ramp south of 2nd St.

2/13/18
DEMONSTRATE ENDURING DESIGN

1- The relocated transit center will be a central facility in the Downtown, and serve as a welcoming point of arrival for regional travelers and visitors to San Rafael. In concert with other Gateway features, the building and site should reflect the heritage of the City, contribute to the City's Vision for extension of the 4th St. Retail Core, and afford transit users the safest, most efficient means of using bus and rail services.

2- The transit center should reflect San Rafael’s pattern, scale, and neighborhood heritage, while also being a unique, innovative architectural statement. Construction materials should produce an enduring high quality with reasonable ongoing maintenance needs.

3- The Transit Center should be safe, well-lit, and attractively landscaped, creating a welcoming effect for users and passers-by. Include Gateway features within the site plan and facility design that are compatible with the City Vision. Nighttime lighting should create a safe, artistic sense of arrival, while limiting night sky glare.

4- Sustainable elements should be visible in its site planning, building design, and operation. Identify storm water pollution prevention, water and energy conservation, renewable energy integration, air and noise quality, waste management, and green construction technology components.
5- Identify locations for appropriately sized public gathering areas to complement the center’s function as a regional and Downtown hub. These settings would include attractive seating, unique paving, landscaping, lighting, directional signage, informational kiosks, historic markers, play areas, public art, trash and recycling containers, and flexible space for micro-enterprise and event opportunities.

6- Advanced communication technology should be integrated into the transit center design, including electronic, real-time messaging, and public Wi-Fi.

7- Transit Center planning should accommodate emerging trends in mobility and mobility technology. Incorporate surrounding site flexibility for change over time.

8- Provide a minimum of 15 ft. wide sidewalks within the block surrounding the new Transit Center

**PRESERVE WHISTLESTOP**

1- Retain the Whistlestop building on its current site, with street level modifications to improve pedestrian enjoyment. Create wider sidewalks on the south and west side of the building.

2- At the north end of Whistlestop, anticipate more public amenities, including possibly a coffee kiosk, fountain, landscaping, or other gateway features.

3- Anticipate removal of a portion of the south end of the Whistlestop building to create safer transit user movement across 3rd St. and more interesting public space.

4- Integrate last-mile drop-off/pick up spaces and a two-way Class IV bikeway into the W. Tamalpais street section.
RESOLUTION NO. 14599

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN RAFAEL
APPROVING AND AUTHORIZING THE MAYOR TO SIGN A LETTER TO THE
GOLDEN GATE BRIDGE, HIGHWAY & TRANSPORTATION DISTRICT
SUMMARIZING CITY COMMENTS ON THE SAN RAFAEL TRANSIT CENTER
RELOCATION PROJECT (SRTC) NOTICE OF PREPARATION (NOP); P18-001

WHEREAS, the Golden Gate Bridge, Highway & Transportation District (District) owns,
operates and maintains the San Rafael Transit Center (SRTC), which is located at 850 Tamalpais
Avenue in the City of San Rafael; and

WHEREAS, SMART has received funding and is actively constructing the second phase of
commuter rail service to Larkspur. This second phase extension will actively use the currently
inactive rail line and right-of-way which bisects the SRTC site, which will significantly impact the
SRTC use; and

WHEREAS, commencing in 2014, the District, in collaboration with the City, began studying
interim and permanent solutions for the SRTC. In 2017, the District hired a transportation
engineering consultant to develop preliminary designs and supportive studies for relocation of the
SRTC; and

WHEREAS, as the ultimate relocation of the SRTC is critical to the planning for Downtown
San Rafael, in 2017 the District and City entered into a Memorandum of Understanding (MOU), to
establish the respective roles of the two agencies and the process for the relocation project. The
MOU confirms that the City will serve as a “Responsible Agency” for the purposes of environmental
review of the relocation project under the California Environmental Quality Act (CEQA); and

WHEREAS, consistent with the CEQA Guidelines, the District has published a Notice of
Preparation (NOP) to solicit comments on the scope of topic areas to be studied in the
Environmental Impact Report (EIR) that will be prepared for this project. As a Responsible Agency,
the City is required to comment on the NOP. City staff has reviewed the NOP and has
recommended a scope of topic areas for study the EIR, which are summarized in a report to the
City Council dated November 5, 2018; and

WHEREAS, at a regular City Council meeting held on November 5, 2018, the report to the
City Council was presented. At this meeting, public comment was accepted, and the City Council
discussed the report findings and recommendations;

NOW, THEREFORE, BE IT RESOLVED that the City Council hereby authorizes the Mayor
to sign, on behalf of the City Council, a letter to the District summarizing City comments on the
SRTC project Notice of Preparation (NOP).

I, Lindsay Lara, Clerk of the City of San Rafael, hereby certify that the foregoing Resolution
was duly and regularly introduced and adopted at a regular meeting of the San Rafael City Council
held on the 5th day of November 2018 by the following vote to wit:

AYES: Councilmembers: Bushey, Colin, Gamblin, McCullough & Mayor Phillips

NOES: Councilmembers: None

ABSENT: Councilmembers: None

LINDSAY LARA, City Clerk
October 8, 2018

Citizens Advisory Committee
San Rafael, CA 94901

Mayor Gary Phillips and City Council
City of San Rafael
1400 Fifth Avenue
San Rafael, CA 94901

Dear Mayor Phillips and Council Members,

On October 4, the CAC was informed that a third community meeting will be held by the Golden Gate Bridge Highway and Transportation District on October 30 to consider options for the new San Rafael Transit Center. To inform this discussion, the Committee wished to reiterate the concerns and recommendations expressed in its July 20 letter, which is attached.

Respectfully,

Andrew Naja-Riese, CAC Secretary

Attachment: CAC letter dated July 20, 2018

Copies: Raymond Santiago, GGBHTD; Steve Kinsey; Danielle O’Leary; Jim Schutz
July 20, 2018

Citizens Advisory Committee
San Rafael, CA 94901

Mayor Gary Phillips and City Council
City of San Rafael
1400 Fifth Avenue
San Rafael, CA 94901

Dear Mayor Phillips and Council Members,

On July 5, the CAC received a presentation of the four proposed transit center concepts from Steve Kinsey. We appreciate the development of four new concepts in response to widespread reservations over the three design concepts previously presented. We applaud the City and Golden Gate Bridge District in leading a series of public forums and conducting a survey to determine residents and commuters’ preferences on the new downtown San Rafael transit center.

The development of a permanent transit center presents a significant, one-time opportunity to create a new gateway to the City of San Rafael while connecting transit users with retail, housing, employment, and tourism. After discussing the four proposals, the CAC has some broad observations for consideration in moving forward with the project:

1) In the **Two-Story concept**, the opportunity exists to create a structure rather than a parking lot that would co-locate all 17 bus bays off-street to meet current and future needs. The CAC is concerned that this concept would be far more expensive than the others. The visual impact would also be a difficult challenge to manage.

2) In the **4th Street Gateway concept**, the bus facility would be placed on either side of 4th St., along with 3 bays on Hetherton St. We are deeply concerned by bus driveways fronting on both sides of 4th St. and by eliminating right turns from Hetherton St. onto 4th St.

3) In the **Whistlestop Block concept**, while the design is fairly compact with 10 bus bays on the Citibank site, the bus bays located on 3rd St. are undesirable because of their negative impact on traffic and pedestrians near Lincoln Ave. Additional congestion may result on 4th St. An alternative approach to the 3rd St. buses might be to widen Tamalpais Ave. to place them there.

4) In the **Across the Freeway concept**, the area under the freeway south of 4th St. would be utilized, along with the Citibank site and some adjustments of Hetherton St. The CAC was intrigued with the possibility of using this project to improve and utilize a currently visually blighted area and believed it to merit thoughtful consideration. It was noted that pedestrians would be able to access buses from 4th St.; however, walking across Hetherton and under the freeway may be less desirable. Walking between the SMART station and
bus bays under the freeway may present a particular challenge for individuals with limited mobility.

Given their preliminary nature, the CAC did not reach a consensus on these concepts. However, members felt that the Whistlestop Block Concept and the Across the Freeway Concept were the most promising. They also were interested in a **potential fifth concept** described by Steve Kinsey that would take up the entire block under the freeway between 4th and 5th streets without having to use the Citibank site. We believe this option should be formally added to the mix.

It would be optimal to arrive at a design that enables seamless and compact connectivity between SMART and bus routes. Most members felt that preserving the Whistlestop building should not be considered a design constraint if it materially conflicts with achieving this goal. Creating public space that is welcoming in the area of the creek was also discussed.

We look forward to reviewing available data to indicate which types of bus-to-bus and SMART-to-bus transfers are most commonly used, in order to inform the location and design of the bus bays.

Please see the enclosed draft minutes of the July 5 meeting for further points made by the CAC and members of the public in attendance.

Respectfully,

Andrew Naja-Riese, CAC Secretary

*Attachment: Draft CAC minutes, July 5, 2018*

*Copies: Raymond Santiago, GGBHTD; Steve Kinsey; Danielle O’Leary; Jim Schutz*
November 19, 2018

Denis Mulligan, General Manager
Golden Gate Bridge, Highway and Transportation District
PO Box 9000
San Francisco, CA 94129-0601

SUBJECT: Notice of Preparation (NOP) of Draft Environmental Impact Report (DEIR) for the San Rafael Transit Center Replacement Project

Dear Mr. Mulligan:

The San Francisco Bay Trail project appreciates the opportunity to provide input on the above-referenced NOP. Founded in 1989 via Senate Bill 100, the Bay Trail’s mission is to complete a 500-mile walking and cycling path around the entire San Francisco Bay, running through all nine Bay Area counties and 47 cities. Over 350 miles of trail are in place today, including 39 of 46 planned miles in Marin County.

Downtown San Rafael has long been a vexing area for walking and biking. Despite its key role in hosting the Bettini Transit Center—the County’s hub for mass transit—getting to or from the busses and trains located here is not only exceedingly difficult, is also undeniably dangerous. Between 2006-2016, over 160 people were hit--three killed--while walking or bicycling in the vicinity, making it the most dangerous area to walk and bike in Marin County. As a transportation hub for those travelling primarily without cars, it should be the most walkable and bikeable area, not the least.

The Bay Trail has recently adopted the planned 2nd to Anderson SMART pathway into its alignment and we look forward to seeing that important trail segment come to fruition. Heading east, the Bay Trail alignment runs out Third Street/Point San Pedro Road and around China Camp State Park. The San Francisco Bay Trail grant program funded 100% design for the new multi-use pathway on the Grand Avenue Bridge, and was a financial contributor to the Canalways Study in order to assist the City of San Rafael in completing the Bay Trail.

The relocation/redesign of the San Rafael Transit Center represents a prime, once-in-a-lifetime opportunity to not only complete the Bay Trail in downtown San Rafael and to capitalize on previous grant investments, but to change this area from a truly dangerous place inhospitable to cyclists and pedestrians to one that is a vibrant and thriving gateway for the City. To achieve this, it will be necessary to look beyond the transit center itself, and to include connections into and out of this space.

We are pleased to note that every one of the eight listed “Project Objectives” in the October 16, 2018 Notice of Preparation can be directly addressed via the design and implementation of robust bicycle and pedestrian infrastructure, as italicized below:

- Objective: *Provide improved transit connectivity and ease of use in and around downtown San Rafael.*

Bay Trail comment: the current transit center is difficult and dangerous to access by foot or by bike, and is not a desirable environment in general. A comprehensive bike/pedestrian access plan incorporating wide, inviting
sidewalks, pathways, cycle tracks, bike lanes, bike/ped optimized signals and crossings, signage, lighting, plazas and good public spaces can address the above objective.

- Objective: 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.**

**Bay Trail comment:** The Bay Trail and the North South Greenway are parts of the transportation network that increase the number of modes by which transit users may safely and efficiently use bus and rail services. A comprehensive bike/pedestrian access plan incorporating wide, inviting sidewalks, pathways, cycle tracks, bike lanes, bike/ped optimized signals and crossings, signage, lighting, plazas and good public spaces can address the above objective.

- Objective: Efficiently accommodate transit users and services and optimize operating costs and improve transit desirability.

**Bay Trail comment:** Hundreds of ferry patrons ride bicycles to the Larkspur and Sausalito terminals, both of which have limited parking options similar to the San Rafael Transit Center. An attractive, well-designed transit center that is easy to access by foot or by bike will not only increase ridership and lessen downtown traffic congestion, but will relieve parking pressure.

- Objective: Design a functional, attractive, cost-effective facility that can meet long-term projected service levels and be implemented in an expeditious manner, so as to minimize the period of use of the interim facility.

**Bay Trail comment:** Good bicycle and pedestrian accessibility will greatly assist in meeting long-term projected service levels. Scaling up to meet increased demand for riders arriving by bike or by foot means adding new racks, lockers and benches with a timeline of +/- 6 months and price tag of $15,000-$20,000. Scaling up to meet additional parking and traffic demands (parking garages, new lanes, etc.) means a timeline of 3-7 years and a cost in the tens of millions.

- Objective: Provide a transit facility that is readily accessible to individuals with disabilities, transit users, and transit-dependent populations, including those with low incomes.

**Bay Trail comment:** All of the above-referenced user groups will benefit dramatically from wide, inviting sidewalks, pathways, cycle tracks, bike lanes, bike/ped optimized signals and crossings, signage, lighting, plazas and good public spaces. The transit center is located directly adjacent to the lowest income, most transit-dependent community in the County. While incremental improvements are coming on the Grand Ave Bridge and along Francisco Boulevard, wholesale changes and improvements are still needed.

- Objective: Provide a secure, safe, and inviting space for transit patrons.

**Bay Trail comment:** Please “go big”—this is the opportunity of a lifetime to address the currently deplorable access issues to and around the Transit Center, and to make the Transit Center a Gateway that the City of San Rafael can be proud of.

- Objective: Create a more accessible transit facility for all users by reducing vehicular, rail, bicycle, and pedestrian conflicts and improving safety.

**Bay Trail comment:** A comprehensive bike/pedestrian access plan incorporating wide, inviting sidewalks, pathways, cycle tracks, bike lanes, bike/ped optimized signals and crossings, signage, lighting, plazas and good public spaces can address the above objective.

- Objective: Provide convenient, pedestrian connections to surrounding land uses.
Bay Trail comment: 100% in agreement, however, please add “and bicycle” after the word “pedestrian.” As stated above, hundreds of ferry patrons access the terminals via bicycle, thus reducing vehicle congestion and the need for costly parking infrastructure.

West Tamalpais Avenue forms a short on-street segment as part of an otherwise continuous pathway from Sausalito to Novato known as the North-South Greenway—and is also part of the San Francisco Bay Trail. West Tamalpais should maintain the same low-stress bicycling experience that people enjoy on the pathways immediately to the north and south. The Bay Trail would be extremely concerned with any proposal that didn’t include separation or physical protection for people biking on West Tamalpais, especially if it generates an increase in vehicular traffic or curbside activity (through passenger loading zones, for example).

The City has committed to a feasibility study looking at east-west connections to identify a street that can accommodate protected bike lanes. While the current Bay Trail alignment in this area is shown on 2nd and 3rd Streets, these are “proposed” versus “existing” segments and it is clear that these may not be the preferred streets for cyclists and pedestrians in the context of a reconfigured transit center (Fourth Street seems a likely candidate). We encourage the City and GGBHTD to move forward with this study as soon as possible, and to also consider how safe and inviting connections to San Rafael High, the Canal Neighborhood via the Grand Avenue Bridge, Montecito Plaza, and ultimately China Camp State park can be made.

The Bay Trail Project looks forward to participating in this planning effort as it moves forward. The long standing and dangerous gaps for walkers and cyclists in this important part of the County deserve robust attention and resources as part of the Transit Center relocation planning work, and indeed, the only way that the eight stated objectives will be achieved is by dramatically improving access for these groups.

If you have any questions about these comments or about the Bay Trail, please do not hesitate to contact me at (415) 820-7909 or by e-mail, mgaffney@bayareametro.gov.

Sincerely,

Maureen Gaffney  
Principal Planner  
Bay and Water Trail Programs  
ABAG/MTC

Cc:  Damon Connolly, County of Marin  
Gary Phillips, City of San Rafael  
Dianne Steinhauser, Transportation Authority of Marin  
Nancy Whelan, Marin Transit  
Farhad Mansourian, SMART  
Jim Schutz, City of San Rafael  
Steve Kinsey, Alta Planning + Design  
Bjorn Griepenberg, MCBC
November 19, 2018

Raymond Santiago, Principal Planner
Golden Gate Bridge, Highway, and Transportation District
1011 Anderson Drive
San Rafael, CA 94901-5318
SRTC@goldengate.org

Re: San Rafael Transit Center Relocation Project Initial Comments on the Scope of the Draft Environmental Impact Report

Dear Raymond,

SMART is pleased to comment on the Scope of the Draft Environmental Impact Report on the San Rafael Transit Center Replacement Project. We look forward to continuing our longstanding partnership with your agency and other partner agencies to offer public transportation services in the North Bay. SMART supports the San Rafael Transit Center Replacement Project and would like to offer comments regarding our operating principles, and the scope of environmental analysis.

The existing Bettini Transit Center has been beyond capacity for some time. The fact that taxis have had to stage in the SMART right-of-way was indicative of the limitations of the site. While the extension of the SMART passenger rail system to Larkspur appears to have incited the need for the new center, the center has been operating beyond its capacity for some time. We encourage the Golden Gate Bridge, Highway, and Transportation District (District) to take this opportunity to start with a “clean slate” and integrate the new transit center with the SMART Downtown San Rafael Station such that it best serves the transit riders making connections in San Rafael in the most efficient way possible. Develop a new transit center that eliminates the need to cross busy streets or walk long distances to make transit connections in order to make public transit as accessible as possible.

SMART has the following five operating principles in terms of the San Rafael Transit Center Replacement Project that are being submitting at this time and will apply to the project and alternatives as we review them:

1. **Safety**: Safety is a top priority for SMART. Whichever design concept is selected, the safety of SMART riders coming to and from the transit center is of paramount concern.

2. **Ease of Accessibility**: Ensuring the SMART riders can easily access the transit center to and from the SMART Downtown San Rafael Station is critical to the function of both the existing SMART station and the future transit center.

3. **No changes to SMART service**: The current SMART train schedule is tailored to meet buses at specific times at the current transit center location as well as key points along the alignment. The new transit center location must continue to synchronize with the SMART train schedule.
4. **No changes to SMART's Infrastructure**: The relocation of the transit center shall not require SMART to make any physical changes to our right-of-way, tracks, or trains.

5. **Clear funding plan**: The available funding for this project must remain clear to the funding partners at all times and will be a key consideration as the Project is defined.

Regarding the scope of the draft environmental impact report, the following are SMART’s comments.

Circulation is an aspect of the environmental documentation that must be fully vetted and explored. In particular, the environmental document should address how buses and other transit vehicles connect with the SMART Train when it arrives & departs from the Downtown San Rafael Station.

SMART is a 24/7 railroad operation. As such, there will be aspects of the environmental documentation that relate to SMART in regards to noise, vibration, air quality, transportation, and land use.

If there are any additional figure concepts that are explored in the environmental documentation beyond the five that were presented at the scoping meeting held on October 30th, 2018, SMART must be notified early in the process so that we have time to thoroughly review them.

We look forward to working closely with your agency on this significant project. Please don’t hesitate to reach out to me if you have any questions, comments or concerns. I can be reached by telephone at (707) 794-3079 or by email at lpayan@sonomamarintrain.org.

Sincerely,

Elizabeth "Libby" Payan
Assistant Planner
ORGANIZATION COMMENTS
Golden Gate Transit  
P.O. Box 9000  
Presidio Station  
San Francisco, CA 94129-0601

Re: San Rafael Transit Center

Dear Golden Gate Transit

EcoRing is a nonprofit organization that promotes ecotourism and green travel in the North Bay. Our Partners are businesses in the tourism industry in Sonoma, Marin and San Francisco counties.

The following are comments regard the planning for a new transit center in San Rafael. Our views are based on the well-know fact that tourist, families with children, the elderly, and woman will not ride unprotected bicycle paths. Our paramount concern is safety for pedestrians and cyclists.

Please extend the SMART pathway presently being built from Anderson Ave to 2nd to Mission Ave. along Tamalpais Ave. thereby connecting Puerto Suello Hill Pathway. This pathway should be protected from all vehicle traffic.

There should be protected bike lanes along 4th Street included in any plan.
Landscaping and trees should be part of any plan. As we transition from an auto-centric transportation paradigm to a transit/bicycle/pedestrian one, we must make connecting hubs attractive, welcoming spaces.

Signage should take into consideration tourists as well as commuters. Multilingual wayfinding signs should be posted.

The project should include bike parking, bike share and bicycle lockers.

Finally, the project should be designed so that neither pedestrians or cyclists need to cross the SMART tracks to reach buses or the SMART pathway.

Sincerely,

Rick Coates
Executive Director
EcoRing
707-6326070 or rcoates@sonic.net
November 14, 2018

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

Dear Mr. Santiago:

The League of Women Voters of Marin County welcomes the opportunity to provide Golden Gate Bridge and Transportation District (“District”) with the following input for use in the Draft Environmental Impact Report for the proposed options for the new San Rafael Transit Center.

The League believes the District needs to consider the following in its environmental assessment of the considered transit center sites. The report needs to identify:

- Pedestrian transportation access to/from all directions (neighborhoods, business areas, schools including SRHS and DMS and Dominican). Identify crosswalks proposed to be eliminated with each option, and which ones improved, and the impact on the different subgroups of transit riders (residents, workers, students) in terms of LOS (Level of Service) walking time delay (i.e., where they must walk farther).
- Impacts of vehicular circulation, including that of buses, around sites including the impacts of emergency vehicles’ ability to access sites or to travel through areas where the sites are located.
- Pedestrian LOS and safety.
- An evaluation of bicycle safety and the accessibility of pathway and bike parking.
- Visual impacts of large open surface bus movement areas and 'public plaza' creating a suburban gap in San Rafael's urban built fabric (mitigation would be a transit center building - a simple shed roof covering over the transit center to fit into the context of the built environment and provide shelter for transit users).
- Safety of the proposed public spaces.
- Impacts of vehicle noise, exhaust, odors on the waiting areas and 'public plaza' areas.
- Impacts of loss of parking spaces.
- Environmental impacts of covering over the creek.

Additionally, the League wants to include with this correspondence, comments it previously submitted to the District in its July 10, 2018, letter in which we reviewed and provided comments on the District’s June 2018 pro and con arguments summary for the four identified site concepts. We have added additional comments for the new fifth option presented by the District at its October 30 community meeting. This information is found in the Addendum to this letter.
The League will continue to monitor the progress of this important project. We look forward to continuing to work with you and your project team.

Sincerely,

Ann Batman, President

Cc:  San Rafael Mayor Gary Phillips  
     San Rafael City Council  
     Marin County Supervisor Damon Connolly  
     Robert Betts, Marin Transit, Director of Operations and Planning
ADDENDUM

Two Story Concept
Pros: No additional comments
Cons:
  A. The building would be enormous and out of portion with other structures in the area.
  B. Does not create a pleasant gateway to Downtown.
  C. Lacks public space option.
  D. The street level area of the transit center would be an unpleasant place to drop-off and pick-up passengers or to wait for buses.
  E. Project is extremely expensive to build.

Across the Freeway Concept - Alternative 1
Pros: No additional comments
Cons:
  A. Area under freeway is not pleasant. It is dark and noisy. If used, the area would need its own roof, a lot of additional lighting and possibly some public art.
  B. It is unclear whether the proposed drop off and pick up area on 4th Street will function efficiently. There are possible issues with turning patterns in and out the area and resulting traffic backups on 4th Street.
  C. Narrow island serving southbound buses on Hetherton Street is not a pleasant and safe place to wait for buses.
  D. Proposed Public Plaza located on west side of Hetherton Street is not a desirable place to be. It is exposed to heavy traffic on Hetherton Street and the related noise.
  E. Proposed option does not show location of bicycle pathway.
  F. Bus access to the Center to and from Hetherton and Irwin will negatively impact traffic flow and safety issues on those streets.
  G. Many riders coming off buses on east side of Hetherton Street needing to cross to the west side of Hetherton Street will choose to unsafely jaywalk across the middle of the block instead of using the pedestrian crosswalks at 3rd /Hetherton Streets or 2nd / Hetherton Streets.

Across the Freeway Concept – Alternative 1A
Pros: No additional comments
Cons:
  A. Narrow loading island on east side of Hetherton is adjacent to busy traffic lane.
  B. Many riders coming off buses on east side of Hetherton Street needing to cross to the west side of Hetherton Street will choose to unsafely jaywalk across the middle of the block instead of using the pedestrian crosswalks at 3rd /Hetherton Streets or 2nd / Hetherton Streets.
  C. Bus access to the Center to and from Hetherton and Irwin will negatively impact traffic flow and safety issues on those streets.
4th Street Gateway Concept
Pros: No additional comments
Cons:
A. Destroys the Fourth Street Gateway in appearance and function,
B. Not a true gateway to Downtown. Eliminates vehicular right turn on 4th Street.
C. Transit rider’s primary mode is pedestrian – this plan limits pedestrian access from the west side and Canal neighborhoods.
D. Does not solve the crossing the street access to SMART and transit.
E. Northbound drop off on West Tamalpais is inaccessible from westbound direction.
F. Inefficient use of Citi Bank site with just eight bus bays.
G. Proposed Public Plaza located on west side of Hetherton Street is not a desirable place to be. It is exposed to heavy traffic on Hetherton Street and the related noise.
H. Plan will increase traffic on Fifth Avenue, once right turn on 4th Street is prohibited.
I. Confusing South/North Bike Path relocation using East Tamalpais Avenue crossing 4th Street and then traveling on sidewalk on 4th Street to Tamalpais Street.

Whistlestop Block Concept
Pros:
A. Allows for Whistlestop building to be used as a comfortable public space, with transit information, restrooms, and seating areas as well other amenities including restaurants.
B. Allows for the elimination of the 3rd Street bus bays if not needed in the future.
C. Provides for easy transfer between all buses. Patrons do not have to cross busy streets.
D. Good integration of North/South bike lane into project area.
Cons:
A. Southbound buses must circle block to reach freeway.
B. Lacks pedestrian crosswalks on existing Transit Center site to Whistlestop block, thus inconveniencing transit users. All crosswalks to the site need to be enhanced for pedestrian safety.

North of 4th Street Concept
Pros:
A. Creates opportunity for 4th Street improvements to bridge Downtown east and west of freeway.
B. Efficient for buses arriving from freeway.
C. Buses serving beneath freeway facility may be less impacted by grade crossing operations.
Cons:
A. Eliminates a number of parking spaces from high occupancy Caltrans park-and-ride lot.
B. Under-freeway spaces are noisy, unhealthily less inviting for comfort and wayfinding.
C. Lacks defined drop off and pick up spaces.
D. No public space.
E. Increase pedestrian crossing across Hetherton and Irvin Streets.
F. Long walk times between bus bays and SMART will make transfers challenging.
G. Would require covering up the creek located on the City block, introducing environmental issues.
H. Bus access to the Center to and from Hetherton and Irwin will negatively impact traffic flow and safety issues on those streets.
I. Many riders coming off buses on east side of Hetherton Street needing to cross to the west side of Hetherton Street will choose to unsafely jaywalk across the middle of the block instead of using the pedestrian crosswalks at 3rd /Hetherton Streets or 2nd / Hetherton Streets.

All options need to include full roof coverage for bus bays for shelter from elements and for the comfort and safety of patrons.

The Whistlestop Concept is the most promising, and the Two-Story Concept is the least desirable.
November 19, 2018

Raymond Santiago
Principle Planner
Golden Gate Transit District
1011 Andersen Drive
San Rafael, CA 94901
SRTC@goldengate.org

RE: Scoping comments for the San Rafael Transit Center (SRTC) Replacement Project Draft EIR

Dear Mr. Santiago:

Marin Conservation League (MCL) has followed and influenced land use decision-making and conservation planning throughout Marin since its founding in 1934. MCL’s mission is to preserve, protect, and enhance the County’s natural assets.

MCL has tracked the visioning and planning efforts for the relocation of San Rafael’s downtown Transit Center since the release of the SRTC Relocation Study and has participated on vision panels led by the Federation of San Rafael Neighborhoods. We submit the following scoping comments for the preparation of the draft environmental impact report.

Since the Notice of Preparation did not identify a “proposed project” for one of the site alternatives, we request that the EIR analyze impacts from each alternative with an equal level of detail. We also request that the EIR analyze impacts both for the period of construction and for the life of the project. For all alternatives, the description, impacts, and mitigations should assume future operation of SMART service to Larkspur Landing, including daily service through San Rafael that would cross several streets. Since the service is projected to be operative before completion of a new transit center, the cumulative impacts, both on-site and off-site but in the area of both projects, should be included in the environmental analysis.

Transportation/Traffic
Analysis of transportation impacts should include use of all recent traffic studies in the project area including, but not limited to, recent studies by San Rafael’s Department of Public Works, the recent Kimley Horn study of the 3rd and Hetherton intersection, the Third Street Rehabilitation Project, and should include available congestion management analysis and traffic data from Marin County’s Transportation Authority of Marin. The EIR should describe and analyze impacts from the following:

- Vehicle access and exit routes from all directions, including from Hwy 101, and including merges that would be added.
- Relocation, elimination, or change of any traffic lanes in the project area.
• Relocation, removals, and additions of pedestrian crosswalks.
• Vehicle backups onto adjacent streets. Identify streets and neighborhoods that would experience increased traffic backups, at what times, along with proposed mitigations.
• Vehicle traffic along the 2nd and 3rd street arteries.
• Impacts to local roads and highways during emergencies and evacuations, such as during wildfire or flood.
• Sight distances for drivers, particularly for buses as they drive to, enter, and park in the new bays, and provisions for passenger access and boarding.
• Location of parking for downtown shoppers as well as for transit users. What parking would be removed and what parking spaces would be added?
• Impacts to downtown businesses, particularly in the east part of 4th Street where there has already been roadway modification to accommodate the train that slows traffic.

Also:
• For each alternative, describe what properties would have to be acquired and how affected businesses would be relocated.
• Describe how Highway 101 through-traffic will be affected by changes in transit center relocation.
• Describe how alternatives will support City goals of reduced congestion and improved safety for pedestrians and bicyclists in the area.
• The North-South Greenway multiuse path has been in Marin County bike plans for several decades. Completion of the segment through San Rafael, from 2nd Street north to Mission Street along Tamalpais Avenue, is an important link in the pathway corridor and is a priority project in San Rafael’s recently updated Bicycle Pedestrian Master Plan. Describe the compatibility and impacts of alternatives with this planned route.
• A priority for San Rafael residents is that students are able to walk and bike safely and comfortably through downtown to Davidson Middle School and San Rafael High School from residential neighborhoods on the opposite sides of the freeway. Describe how alternatives will positively or negatively impact safe, comfortable east-west circulation under the highway for students and other users to access schools, shops and services.

Air quality
The EIR should describe and analyze impacts to air quality (including odors); cumulative and net increases in air pollutants, including emissions from buses entering and exiting the bays and from vehicles dropping off or picking up passengers; and any increased emissions due to associated increased traffic idling from possible added congestion.

Greenhouse gas emissions
Recent reports have stated transit ridership, especially traditional bus service, is declining both locally and nationally. SRTC design alternatives should describe how they will accommodate newer transit technologies, such as microbuses and ride-sharing vehicles, near the bus bays to drop off and pick up commuters during transit interchange without incurring negative impacts to local traffic. How the SRTC will support transition to electric buses and accommodate other
developing technologies, such as autonomous vehicles, should also be described.

Describe how alternatives will increase ridership, providing efficient, safe and comfortable experiences for public transportation users. Increased ridership will help San Rafael, and other jurisdictions, meet greenhouse gas reduction goals in their climate action plans. The EIR should assess net impacts to greenhouse gas emissions from current ridership levels and realistic projected increases in ridership.

**Noise and Light**
Assess the extent to which alternatives would contribute to noise and light pollution in the area and how these impacts can be mitigated.

**Hydrology and water quality**
The EIR should show existing creeks on the site maps, and 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). The report catalogs effects of three different water elevation projections for near, mid, and far term periods, with and without a 100-year storm. The transit center relocation should consider at minimum the projections for near and mid-term time periods, estimated to be about 10 and 30 years or less from center construction. Presumably, the relocated center would have a life span that would encompass these time periods.

The EIR should identify which alternatives, if any, will meet the goals of “climate-safe infrastructure” as set forth in the California Natural Resource Agency’s recent report “Paying it Forward: The Path Toward Climate-Safe Infrastructure in California” and describe adaptation strategies to flooding.

The EIR should describe maximum anticipated rates and volumes of stormwater runoff, drainage capacity of stormwater management systems and any needed expansion, filtration into the San Rafael Creek watershed and possible erosion during construction and operation. Include proposed mitigations, especially for alternatives that would alter existing creeks or flows. MCL would like to see watershed restoration happen in conjunction with transportation improvements.

Assess toxicity of soils on the project site and describe how sediment and any contaminants will be prevented from entering the creeks and the nearby estuary. Describe how stormwater will be filtered to meet the California State Water Quality Control Board’s regulations for Phase II small municipal separate storm sewer systems (M4S). Describe how restoration of creeks, trees and riparian vegetation, and installing green infrastructure and permeable pavement as elements of the alternatives would help mitigate flooding.

**Biological resources**
Describe biological resources within the project area. Analyze impacts to nearby riparian or wetland habitats and their biological resources, both resident and migratory, including invertebrates, aquatic species and vegetation. Describe current urban wildlife habitat value and
how it will be protected.

San Rafael is a “Tree City”. Trees contribute to stormwater reduction, improve air quality and contribute to carbon sequestration and greenhouse gas reduction, lower ambient air temperatures and counteract urban heat island effects, buffer noise, wind, and odors. They provide beneficial visual impacts and provide needed habitat for urban and migrating birds, wildlife and insects (including pollinators). The EIR should identify whether trees will be planted as part of the project and their impacts as they grow and their canopies spread over time.

**Aesthetics**
Describe the viewshed of the surrounding hills. Provide simulations of how views from a variety of angles will be impacted.

Goals that emerged from the Federation of San Rafael Neighborhoods’ panel discussions as a vision for the relocated transit center included: efficient flow of traffic from the 101 highway and on city streets; safe pathways for pedestrians and cyclists travelling all directions; an appealing, aesthetic, and welcoming townscape; and respect for San Rafael’s natural, cultural and architectural history and resources. MCL hopes the Bridge District’s Transit Center Replacement Project will achieve these goals.

Thank you for the opportunity to comment on the scope of the upcoming draft environmental impact report.

Sincerely,

Linda J. Novy
President
Hi Raymond,

Marin County Bicycle Coalition (MCBC) appreciates the opportunity to provide input on the San Rafael Transit Center Project. The attached letter largely echoes the comments we submitted to GGBHTD on July 13, 2018, which are appended.

Respectfully Submitted,
Bjorn Griepenburg

Bjorn Griepenburg
Policy & Planning Director
Marin County Bicycle Coalition
(415) 723-4673 | marinbike.org

When you ride Marin's roads, trails, and pathways, you Experience MCBC. Join us today.
November 19, 2018

Raymond Santiago, Principal Planner
Golden Gate Bridge, Highway and Transportation District
PO Box 9000
San Francisco, CA 94129-0601

Dear Mr. Santiago,

Marin County Bicycle Coalition (MCBC) appreciates the opportunity to provide input on the San Rafael Transit Center Project. This letter largely echoes the comments we submitted to GGBHTD on July 13, 2018, which are appended.

First, we’d like to reiterate our belief that the North Bay’s busiest transit hub should be the most walkable and bikeable area in the County. Under existing conditions, that is far from the case. Between 2006-2016, over 160 people were hit--three killed--while walking or bicycling through the transit center area, making it the most dangerous area to walk and bike in Marin County.

That’s why MCBC is looking at the San Rafael Transit Center Project as a once-in-a-lifetime opportunity to reinvent this area to make it a thriving transportation hub and gateway to San Rafael. **MCBC feels strongly that our recommendations (outlined below) should be considered baseline project elements regardless of the preferred alternative.**

**Priority Elements**

1. **Include the North-South Greenway along Tamalpais Avenue between Mission Avenue and 2nd Street**, connecting the Puerto Suello Hill Pathway with the soon-to-be-built 2nd to Andersen Pathway. Like the pathways the four block stretch will connect, the route should be free of hazards such as passenger loading zones, bus
bays, on-street parking, and vehicular traffic. Current transit center alternatives show Tamalpais with loading zones and other curbside uses that are not compatible with the North-South Greenway.

2. **Include protected bike lanes along 4th Street.** There isn’t a single inch of asphalt dedicated to moving bikes east and west through San Rafael’s downtown. Any configuration that results in reconstruction of 4th Street frontage should include protected bike lanes.

3. **Create a safe, convenient, and attractive pedestrian experience.** People walking through the area should be free to take direct routes free of dangerous roadway crossings. Public spaces should be incorporated throughout the project.

4. **Conveniently locate secure bike parking, bike share, and space for other emerging car-free mobility options** (such as shared scooters) in order to improve connectivity to and from transit.

For the past two years, MCBC has advocated for the creation of a grid of “All Ages and Abilities” (AAA) bikeways to and through Downtown San Rafael. San Rafael’s current Bicycle and Pedestrian Master Plan (BPMP) Update—which was adopted on July 16, 2018--includes the two important potential AAA bikeways in the transit center area listed above; Tamalpais is identified as the north-south route, while the east-west route is yet to be determined, pending a study and additional outreach.

On the latter, we strongly encourage the City and GGBHTD to move forward with this study/outreach as soon as possible, and to consider how safe and inviting connections can be made to San Rafael High School, the Canal neighborhood, and other areas east of 101. During the BPMP Update, the east-west route was subject to debate among MCBC membership, San Rafael’s Bicycle and Pedestrian Advisory Committee, and the local Safe Routes to School Task Force, with strong consensus that 4th Street was the preferred route *east* of Tamalpais.¹

### Project Objectives

Like our partners at the San Francisco Bay Trail, we are pleased to see that every one of the eight listed “Project Objectives” in the October 16, 2018 Notice of Preparation can be directly addressed via the design and implementation of enhanced bicycle and pedestrian facilities. Our

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¹ West of Tamalpais, where curbside activity is much higher, there was debate about whether 4th or 5th would be the best east-west route through downtown.
comments on the Project Objectives follow:

- As noted above, the existing transit center is difficult and dangerous to access by foot or by bike, and is not an inviting environment in general. A comprehensive bike/pedestrian access plan incorporating wide, inviting sidewalks, pathways, cycle tracks, bike lanes, bike/ped optimized signals and crossings, signage, lighting, plazas, landscaping, and good public spaces can address several of the objectives.

- Hundreds of train and ferry patrons already ride bikes to the North Bay's ferry terminals and SMART stations, many of which have limited parking options similar to the San Rafael Transit Center. An attractive, well-designed transit center that is easy to access by foot or by bike will not only increase ridership and lessen downtown traffic congestion, but will relieve parking pressure.

- Good bicycle and pedestrian accessibility will greatly assist in meeting long-term projected service levels. Scaling up to meet increased demand for riders arriving by bike, foot, or other non-auto modes means adding new racks, lockers, benches, and space for other emerging mobility options, such as shared bikes and scooters, at a minimal cost. Scaling up to meet additional parking and traffic demands (parking garages, new lanes, etc.) would be much more costly in terms of time, money, and space.

- On the final objective, please add “and bicycle” after the word “pedestrian.” Bicycles greatly expand the reach of transit, extending the “first and last mile” up to three-plus miles. One can travel four miles by bike in the time it takes to walk one mile.

**Implementation**

The transit center relocation presents a unique opportunity to reinvent an area that is currently inhospitable to people walking and bicycling. MCBC strongly encourages GGBHTD and all agencies involved to implement the recommendations outlined above as baseline elements of the project. Given the competitive nature of bike/ped funding, we respectfully request that our recommendations are prioritized for funding through the project’s Regional Measure 3 funding and/or Regional Measure 3’s North Bay Transit Access Improvements program.

Again, we urge GGBHTD to seize this opportunity to address the access issues around the Transit Center, and to transform the area into a gateway that the City of San Rafael and transit agencies are proud of.
If you have any questions, please feel free to reach out by calling (415) 723-4673 or emailing bjorn@marinbike.org.

Respectfully Submitted,

[Signature]

Bjorn Griepenburg  
Policy & Planning Director  
Marin County Bicycle Coalition

cc:  
Damon Connolly, County of Marin  
Gary Phillips, City of San Rafael  
Dianne Steinhauser, Transportation Authority of Marin  
Nancy Whelan, Marin Transit  
Farhad Mansourian, SMART  
Jim Schutz, City of San Rafael  
Steve Kinsey, Alta Planning + Design  
Maureen Gaffney, San Francisco Bay Trail
Dear Mr. Mulligan,

Marin County Bicycle Coalition (MCBC) appreciates the opportunity to provide input on the San Rafael Transit Center Project. Founded in 1998, MCBC’s mission is to promote safe bicycling for everyday transportation and recreation. We have long supported transit and bicycle-transit integration, valuing the two modes’ ability to enable car-free mobility, especially when combined.

Between 2006-2016, over 160 people were hit--three killed--while walking or bicycling through the transit center area, making it the most dangerous area to walk and bike in Marin County. As a transportation hub for those travelling primarily without cars, it should be the most walkable and bikeable area, not the least.

With this in mind, MCBC feels strongly that our recommendations should be considered baseline project elements regardless of the preferred alternative.

All Ages & Abilities Bikeways

A recent national survey found that 51 percent of Americans are interested in bicycling more regularly, but too concerned for their safety to do so. In order to make bicycling an option for the majority of people, bikeways need to be designed for use by people of all ages and abilities (AAA), not just the strong and confident.
For the past year, MCBC has advocated for the creation of a grid of all ages and abilities bikeways to and through Downtown San Rafael. San Rafael’s current Bicycle and Pedestrian Master Plan Update--set to be adopted by the City Council next Monday, July 16--includes two incredibly important potential AAA bikeways in the transit center area:

- **West Tamalpais Avenue (North-South Greenway):** West Tamalpais Avenue forms a short on-street segment as part of an otherwise continuous pathway from Sausalito to Novato known as the North-South Greenway. West Tamalpais should maintain the same low-stress bicycling experience that people enjoy on the pathways immediately to the north and south. **MCBC will strongly oppose any proposal that doesn’t include separation or physical protection for people biking on West Tamalpais, especially if it generates an increase in vehicular traffic or curbside activity (through passenger loading zones, for example).**

- **Downtown East-West Commercial Connector:** There isn’t a single inch of asphalt dedicated to moving bikes between the east and west through San Rafael’s downtown. The City has committed to a feasibility study to look at the various east-west streets in hopes of identifying a street that can accommodate protected bike lanes. Fourth Street seems a likely (and preferred) candidate. **We encourage the City and GGBHTD to move forward with this study and consider whether protected bike lanes can be incorporated into this project--or better yet, constructed sooner.**

For more information on what constitutes an AAA bikeway, we recommend consulting NACTO’s *Designing for All Ages & Abilities: Contextual Guidance for High-Comfort Bicycle Facilities.*

**Bike Parking & Bike Share**

Ample secure bicycle parking will also play an important role in encouraging people to bike to the transit center. MCBC recommends incorporating the recommendations outlined in the *SMART Stations’ Bicycle Parking Investment Plan (2016):*

- A mix of short (inverted u-racks) and long-term (e-lockers or a secure bike shelter) parking. The *Investment Plan* recommended 10 inverted u-racks and a secure bike shelter with 60 spaces at the Downtown San Rafael SMART Station.

- Both types of bike parking should be conveniently located, with easy access to the SMART platforms and transit center. They should be located in well-lit, visible areas to prevent theft.
Transportation Authority of Marin and Sonoma County Transportation Authority are moving forward with a new bike share system that will serve SMART station areas. Though this system will likely be dockless, MCBC recommends GGBHTD set aside a dedicated space for bike share parking so that the bikes can be easily located and returned by riders.

**Walkability**

As is often noted, everyone is a pedestrian. This is especially true for transit riders, who rely heavily on their feet and mobility aids to make transfers or get between transit and their destinations.

MCBC encourages the City of San Rafael and GGBHTD to design the transit center and its surroundings with convenience, safety, and aesthetics in mind in order to create a walkable and inviting transit center. Pedestrian crossings of busy one-way streets in the area should be minimized, as these roadways have higher rates of collisions that result in severe injuries.

**Implementation**

The transit center relocation presents a unique opportunity to reinvent an area that is currently inhospitable to people walking and bicycling. MCBC strongly encourages GGBHTD and all agencies involved to implement the recommendations outlined above as baseline elements of the project.

Respectfully Submitted,

Bjorn Griepenburg  
Policy & Planning Director  
Marin County Bicycle Coalition
Dear Mr. Santiago,

MARA is the neighborhood association for the Montecito neighborhood, which is the nearest residential neighborhood to the various sites being considered for the Transit Center. We are responding to the GG Bridge, Highway Transportation District’s request for comments on the scope and content of the EIR regarding the SR Transit Center’s new location. Thank you for this opportunity.

In an attempt to not try to re-invent the wheel, we would first like to say that our preferred site is the Whistlestop Block Concept, and that we agree entirely with all of the suggestions made re that site and the EIR by Sustainable San Rafael in their letter of Nov 5th. This site would make
pedestrian travel between SMART and the bus Transit Center easy and safe for pedestrians, would protect and use the historic train station, and make a true transit hub.

Our least favored site (other than the 4th Street Gateway concept, which has nothing whatever to recommend it), is the "North of Fourth Street Concept".

- The EIR should assess air quality, noise, and the safety of pedestrians trying to get from the SMART station to the Transit Center – they would have to cross at least 2 busy streets, instead of being within easy reach of their destination. It says in the NOP that this site “would require customer service, restrooms, and pick-up drop-off functions to be located off site”. Since this site takes up an entire block, it appears that this would require anyone trying to use such services to cross one of the very busy surrounding streets – another issue for assessing safety of pedestrians in the EIR.

- Also, Irwin Street, which is on the East of this site, is basically both an off ramp and an on ramp for Hwy 101. Traffic on this street is one way, and frequently moves faster than the speed limit. The EIR should study how the interaction of the buses and this traffic would affect safety.

- This site, according to the NOP, would require covering an entire block of the creek. Restoring that creek is one of the main goals of many residents of San Rafael, not further degrading it. This should of course be considered in the Biological Resources section of the EIR, regarding this federally protected wetland. We have personally seen many ducks using this creek at various times, as well as turtles. We are sure that other wildlife use it also.

- Aesthetics – We do not feel that any amount of lighting, art work, signage, etc. would make this site a pleasant experience for bus customers, given the noise and exhaust from the freeway directly above it. Adding that to the lack of on site services, it would appear that this site fails to accomplish the goal of having people happy to use the new Transit Center – many people have enough resources to not have to travel by bus if it is too inconvenient or uncomfortable, and unfortunately their alternative would be go get into their cars.
Lastly, we would like to echo the City of San Rafael’s request that, although it is not a CEQA related topic area, an Assessment of the impact of this site on Parking should be evaluated for each alternative, including this one, which removes current commuter parking. MARA has been impacted for many years by the fact that the current GG Transit center was built without any consideration of parking, as was SMART. Along with local retail, this has caused many people to park on our residential streets while they are either commuting to work or walking to work at local stores.

Thank you and your staff for all of the outreach you have done on this subject, and how responsive you have been to input from the public. This is a good example of how this sort of process should work.

Sincerely,

Board of Directors of MARA

Jackie Schmidt
Ann Bauer
Sherna Deamer
Bryn Deamer
Constanza Perry
Kristie Garafola
Tom Hurray
Nora Contini
November 18, 2018

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

Re: Bettini Transit Center Relocation

Dear Mr. Santiago:

The Point San Pedro Road Coalition welcomes the opportunity to comment on the EIR scoping and to again provide the Golden Gate Bridge and Transportation District (“District”) with input on the Preliminary Concepts Under Consideration for the Bettini Transit Center Relocation. This includes later updates as presented to the public at the October 30, 2018 Notice of Preparation of Draft Environmental Impact Report and Scoping Meeting.

Residents along the Pt. San Pedro Road peninsula remain very interested in this project and recognize the importance of convenient bus and SMART train access as well as improved pedestrian and bicycle safety. However, there are serious concerns in our community about the potential to be adversely impacted by traffic delays arising from the relocation of the Transit Center and extension of SMART to Larkspur.

Scoping Additions

Please add the following items to the list of issues that are to be addressed in the Draft EIR in order to ensure we have a full and complete report:

- Impact on traffic congestion: Each concept will have a different impact on local traffic patterns and congestion.
- Impact on parking for transit users: Some of the concepts remove critical existing parking with no provisions for replacement. The EIR needs to address the impact of parking reduction.
- Emergency services: What are the ramifications on provision of service during emergencies, either at the proposed transit center or for surrounding neighborhoods, specifically the San Pedro Road corridor? Different concepts will enhance or impede delivery of emergency services in these areas due to traffic patterns, congestion, or damage due to natural catastrophes.
- Transit Center user data: (a) How many people are estimated to be accessing the Transit Center and SMART train? (b) From which directions will the people approach the Transit Center? (c) How will users arrive/depart (on foot, in cars, on bikes, etc.)? (d) What is the impact on pedestrian/vehicle interfaces at nearby intersections? These needs to be assessed at different times of day and include all users (commuters, students, San Rafael business employees, etc.) of the transit center. The study should also identify impact on existing or proposed crosswalks for each option.
• Visual impact: What will be the visual impact of each option as it relates to the look and feel as an entry point to the City. This should encompass how the area is viewed by drivers, pedestrians, bicyclists, as well as users of the Transit Center and SMART train.

Preliminary Concepts Review

We have reviewed the Concepts developed by the District, although we have had little time to fully review the new “North of 4th Street Concept”. As we previously expressed, it is difficult to assess the options without ridership data to indicate projected use including: (a) how many people are estimated to be accessing the Transit Center and SMART train, (b) from which directions will the people approach and (c) how users will get there (on foot, in cars, on bikes, etc.). With the information provided, the Whistlestop Block Concept option appears most promising, although the North of 4th Street Concept is an interesting option but with several concerns.

We think the Whistlestop Block Concept can be enhanced by making some additional modifications such as:

1. Move the three bus bays currently shown on Third Street and four bus bays on Tamalpais Avenue to the area now used as for Whistlestop parking lot at Tamalpais and Lincoln. This has many benefits:
   • Removes buses from congested streets while patrons get on and off the buses.
   • Makes it easier for bus riders to transfer between different bus routes.
   • Makes it easier for SMART riders to transfer to buses (and vice versa).
   • Costs to acquire the space on the block west of Tamalpais to enhance the Whistlestop Block Concept may be low since much of the block is currently not developed.
   • Places this location near to development sites;
   • Provides potential to utilize more of the block between Tamalpais and Lincoln and could greatly enhance the Whistlestop Block Concept project to provide both an improved Gateway to San Rafael and integration with Downtown, possibly making room for a central plaza.

2. Use Tamalpais Avenue between 3rd and 4th Street as a designated passenger drop off and pick up area, an area for taxis and Ubbers, as well as a bike lane. This, too would have many benefits:
   • Eliminates the need for buses to turn onto Tamalpais Avenue making it easier for pedestrians to cross Tamalpais, improves safety, and makes the entrance to the Whistlestop building more accessible
   • Enhances passenger, bicycle, and pedestrian safety by prohibiting buses on the block of Tamalpais Avenue between 3rd and 4th streets.
   • Eliminates the need for pedestrians to cross 4th Street from the drop off/pick up area as shown in the Concept proposal.
   • Provides easy access to the Whistlestop building which can be used as the heart of the Transit Center and train station.
   • Keeps buses off of this block allowing for a view corridor and making it possible for the Whistlestop building to be seen and appreciated.

If preservation of the entire Whistlestop Building in its current configuration results in significantly greater financial costs, a reduction in pedestrian and bicycle safety, and/or adverse traffic impacts, then this constraint should be reconsidered. For example, the Jackson Café portion of the building could be reconfigured allow for that portion of the site to be utilized for a greater use.
North of 4th Street Concept

This is a recent addition to the original four concepts, and we have had little time to study it thoroughly. It could be very attractive to our residents because it moves the transit center and related traffic away from the critical 3rd Street access to Highway 101 and downtown San Rafael for residents on the Pt. San Pedro Road corridor. However, even with a brief review, several issues become apparent, among them being:

- No defined location for pickup/dropoff. A convenient, safe area for this is essential.
- CalTrans’ potential objections for construction under the highway
- Environmental concerns and objections for covering the creek
- Safety issues for pedestrians crossing Hetherton to/from the train station and downtown San Rafael
- Ambiance for bus passengers waiting under the highway
- Impact of highway noise on the transit center
- Removal of critical parking with no replacement in the Concept. Additional parking must be provided.
- Impact on general traffic caused by slower bus traffic on Irwin and on Hetherton

All of these issues, and others to be identified, would need to be addresses before we could render a further opinion on this concept.

The Point San Pedro Road Coalition will continue to monitor the progress of this important project. We will appreciate being informed when data about ridership and traffic becomes available as it will profoundly affect consideration of the various concepts. We would like to reiterate that it is critical for our community to receive information well in advance of deadlines for input so that we can provide meaningful comments in the future. We look forward to continuing to work with you and your project team.

Sincerely,

Denise M. Lucy                                Bonnie Marmor
Co-President                                  Co-President

cc: Mayor Gary Phillips
    San Rafael City Council
    Supervisor Damon Connolly
    Steve Kinsey, Alta Planning

The Point San Pedro Road Coalition (FEIN 68-0458233) is a 501(c)(3) tax-exempt organization. Subject to applicable limits, your contributions are tax-deductible
Raymond-

In response to the Notice of Preparation of the Draft Environmental Impact Report for the San Rafael Transit Center, I'm attaching Sustainable San Rafael's comments on the potential scope of the DEIR.

Comments specific to the scope are embedded in a larger discussion of the project alternatives being considered, in order to provide the context and concerns giving rise to our comments and help clarify the reasons these items need full analysis.

Thanks very much. We look forward to continuing to work with you as the process proceeds.

-Bill Carney
President, Sustainable San Rafael

415.302.0110 / 457.7656
November 5, 2018

Raymond Santiago  
Principle Planner  
Golden Gate Transit District  
1011 Andersen Drive  
San Rafael, CA 94901  

RE: San Rafael Transit Center EIR Scoping Issues  

Dear Raymond,  
Sustainable San Rafael would like to reiterate and emphasize a number of issues we have previously raised concerning the new San Rafael Transit Center, and request that they be addressed in the Scope of the Draft Environmental Impact Report that you are now developing.  

Our Board has carefully reviewed the five Transit Center concepts (and variants) developed by your team. We continue to think that the ‘Whistlestop Block’ concept has great merit, safely consolidating transit services and returning the depot building to transit use. It fulfills all the objectives outlined in our letters of May 21 and July 8.  

‘Whistlestop Block’ Concept  
This concept also has the best ‘place-making’ possibilities, creating a central ‘transit plaza’ framed by ‘gateway’ development opportunity sites north and south, the Tamalpais bikeway to the west, and the chance to restore Irwin Creek and otherwise enliven the area under the freeway east of the site. In short, the concept would result in a welcoming and active entry to San Rafael, implementing the basic scheme first presented in the Downtown Station Area Plan.  

- The EIR ‘aesthetics’ section should analyze the ‘place-making’ potential of each alternative as a key impact.  

- The EIR ‘land use and planning’ section should assess the impact of each alternative on the appeal of area ‘opportunity sites’ for development contributing to the ‘gateway’ quality of the area.  

- The EIR should assess the impact of leaving a central site free of development (the bus plaza) or in low-scale development (the depot building)—both on the enhanced development potential of adjacent sites and on the ‘gateway’ character of the whole area.  

- The potential of each concept to contribute to important public improvements surrounding it should also be assessed, including the north-south bike-pedestrian greenway along Tamalpais and the restoration of Irwin Creek under the freeway, both key elements of the ‘gateway’ district anchored by the project.
• The EIR should review the project for consistency with the recommendations of the Downtown Station Area Plan.

One modification of the Whistlestop Block Concept that we would ask you to consider is reversing the direction of the four buses shown on Tamalpais, so they would enter from 4th Street and proceed south. This would allow passenger loading along the west side of the street, with the bikeway switched to the east side to better align with the bikeway along Tamalpais to the north and to provide a more open and gracious setting for the depot building. Whichever the direction of the buses, it appears that the Concept could be achieved within the 50’ Tamalpais right-of-way and still provide sufficient sidewalks on both sides.

• The EIR should assess north-to-south bus flow on Tamalpais.

We defer to the traffic engineers and bus route planners regarding the location of the three buses shown along the heavily trafficked 3rd Street. However, further consolidation of transit could be accomplished by acquiring an additional 50’ (one lot width) along the west side of Tamalpais between 3rd & 4th. This would allow both northbound and southbound buses on this block, perhaps loading from a central island to keep the sidewalks unencumbered.

• The EIR should include this wider 2-way bus mall on Tamalpais between 3rd and 4th Streets.

A simpler alternative would be to relocate the three 3rd Street buses to the west side of the Bettini site, which currently accommodates four buses. This could be an especially appealing location for non-commute buses such as the Airporters or Greyhound. A reconfigured site could allow for necessary bus turning radii and still provide car drop-off and taxis along the east curb, with the bike path along the west curb, in alignment with the 2nd Street crosswalk. Passengers would have direct access to the main transit plaza via the pedestrian and bicycle crosswalk at 3rd and Tamalpais, which must be made safe in any case.

• We strongly urge that the EIR include analysis of Tamalpais south of 3rd Street and the sliver of the Bettini site west of the rail tracks as an alternative location for the three 3rd Street bus bays.

• The EIR should assess the intersection treatments needed at Tamalpais and both 3rd and 4th Streets to assure safe access to the project by cyclists, bus passengers and other pedestrians.

• The EIR should assess the adequacy of car drop-off and taxi zones serving all alternatives, including along Tamalpais both south of 3rd and north of 4th Streets.

Additional considerations related to the Whistlestop Block Concept:

This concept provides the greatest flexibility for future expansion and modifications of transit services, securing public ownership of the entire block between 3rd and 4th Streets, while retaining public
ownership of the Bettini site by ground-leasing development rights on its most buildable eastern portion.

- *The EIR needs to assess the flexibility of each concept for future expansion and likely changes in transit technologies and services.*

- *This assessment should include the merits of securing public ownership of an expanded site, including ground-leasing development rights rather than selling existing public property.*

Public ownership and use of the depot building, with portions perhaps operated by private parties, offers a number of possibilities, including ample ground floor transit services and perhaps direct access to the west train platform. Marin-specific retail and cafes could open onto plazas at both ends of the building. The original arcade might be re-opened to engage such uses and invite in the public. Upstairs offices and meeting rooms could be rehabilitated, and the bike storage shown west of Tamalpais could also be accommodated inside. The building would provide an iconic visual anchor for both the transit plaza block and the surrounding gateway district. Some of its architectural details, such as the repeating arches, might be echoed in contemporary elements of the bus plaza such as curved canopies over passenger waiting and loading areas, and elegant seating design.

- *The EIR ‘cultural resources’ section should assess the significance of affected buildings, including potential reuse and modification that could enhance their character and contribution to the area.*

The 2-story depot building together with the open transit uses would provide a visual commons at San Rafael’s front door, which would help avoid the walling off of downtown as adjacent blocks are developed with taller building. This would also help preserve the view corridor along Tamalpais and the train tracks from 2nd Street to Mission, keeping the city’s defining hillsides in view.

- *The EIR ‘aesthetics’ section should assess the protection or loss of view corridors into downtown and to surrounding hillsides.*

The car and taxi drop-off zones shown along Tamalpais north of 4th Street are important elements of this concept. They should be supplemented by the zone south of 3rd, as mentioned above, which would better serve drop-off traffic approaching from the west. Enhanced pedestrian pathways from the park-and-ride lots under the freeway should also be provided as part of this concept, together with restriping, repaving and perhaps reconfiguration to improve usage of the lots and pedestrian access to the East End of 4th Street. Restoration of the creek would greatly enhance this experience.

- *The EIR ‘transportation and transit’ section should assess the quality of access to the project for those arriving by car, including the provision or loss of drop-off and commuter parking facilities.*

The ‘gateway’ quality of the new transit center would also be
heightened by planting large street trees (like the London Plane trees now thriving on 5th Avenue) along Hetherton, Irwin and Tamalpais, and within the transit plaza itself. The arrival into San Rafael would then feel like entering a vibrant downtown in a park-like setting.

- *The EIR ‘biological resources’ section should assess impacts both on existing resources (including street trees and creek-side zones) and on the future ability to restore and enhance those resources.*

**‘Under Freeway’ Concepts (both South and North of 4th Street)**
The various under freeway schemes that have been suggested seem far less pleasant for users and require crossing busy Hetherton to reach the trains, other buses and/or downtown, as well as covering over portions of the creek and thereby sacrificing the amenity it could provide if properly restored. The noise and exhaust under the freeway make it an unpleasant and perhaps unhealthy place to wait, which would require extensive structures, lighting, artwork and other mitigations. The narrow bus islands on Hetherton are particularly unwelcoming and unsafe places for passengers awaiting their bus.

- *The EIR ‘air quality’ and ‘noise’ sections should assess the impact of these factors on the passengers using the project facilities, and the ‘aesthetics’ section should assess the experiential and visual impacts of the project on its users, as well as its surroundings.*

- *The safety and amenity of passengers accessing the project needs to be paramount in the EIR ‘transportation and transit’ section, including the extent to which each concept is able to accommodate passenger shelter, restrooms and snack services.*

**‘4th Street Gateway’ Concept**
Our chief concern with this concept is that the buses on both sides of 4th Street would interrupt enhanced pedestrian access to the East End. Maintaining an unencumbered sidewalk on the north side of the street is essential to this goal. The concept also precludes development of a significant opportunity site at the northwest corner of 4th and Hetherton and sacrifices two Victorian buildings on 5th Avenue. The ‘plazas’ shown on Hetherton are too small and uninviting to function as open space, and the bus bays on Hetherton expose passengers directly to traffic. The scheme also prohibits automobile turns onto 4th Street.

- *The EIR ‘transportation and transit’ section should thoroughly assess impacts on the pedestrian experience, including the access between downtown and areas east of the freeway.*

**‘Two-Story’ Concept**
The success of such a large building concept would require an extraordinary architectural effort, which we feel cannot be adequately assured, especially within a limited budget. Elegant solutions to the ramping required and to the covering of 3rd Street are not obvious.

- *We suggest not spending scarce funds to analyze this concept.*
Need for more operational information
For the public and decision-makers to adequately evaluate the concepts, much more information is needed about how the various schemes would actually function for the buses and how bus movements would affect the surrounding streets. In addition to traffic impacts, the missing information includes the routing of the buses and the numbers of passengers transferring among the various bus lines and between each bus line and the train, as well as those bound for downtown itself.

Equally important, the pedestrian and bike routes to and through the Transit Center need to be thoroughly diagramed for each concept, in particular addressing the needs of students and others en route from the Canal, San Rafael High, Davidson Middle School, Dominican, and the Montecito neighborhood and shopping district.

Such basic functional data is critical for developing and judging the concepts, and we suggest that it be made available as early as possible.

- A clear and complete assessment of how each alternative meets the basic functional requirements of the project program—including passenger comfort, connectivity among transit modes, and access to the transit center by foot, bike or car—should form the core of the EIR ‘transportation and transit’ section.

Sustainable San Rafael also endorses the City staff’s recommendations that the EIR use the updated San Rafael Climate Change Action Plan and associated GHG Emissions Reduction Strategy in assessing the greenhouse gas impacts of the project, and that the EIR assess the risk associated with projected sea level rise in the station area.

Thank you and your team for your diligence in offering a range of concepts for public consideration. We look forward to thoughtful public decision-making based on a thorough EIR.

Sincerely,

William Carney
President, Sustainable San Rafael

Copies:
Mayor Gary Phillips
San Rafael City Council
Jim Schutz
Bill Guerin
Paul Jensen
Danielle O’Leary
Steve Kinsey
Raymond Santiago  
Golden Gate Bridge, Highway and Transportation District  
1011 Andersen Drive  
San Rafael, CA 94901-5318

Re: SRTC Scoping

Dear Mr. Santiago:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental organization focused on reducing the impacts of transportation on the climate. We offer these brief comments on the San Rafael Transit Center Relocation project's environmental review:

**Project Purpose and Need: Scale**

We believe the scale of the proposed project has been overly influenced by local interests, who seek to minimize the project, seeing it as an intrusion into Downtown. Note the language “at least 19 bays.” Others flat-out reject urbanism, seeking to shift the transit center out of the downtown, so it doesn’t interfere with traffic. In our past writings, we have explained why the dual challenges of ever-increasing congestion and GHG emissions mean that existing travel habits are unsustainable going into the future. (See attached.) Present day conditions are not helpful in understanding the needs of the future.

The scoping process now needs to consider the next 50 years of transportation in the North Bay. Because of climate change, this project is not merely the replacement of an existing facility. It is the construction of a facility that will be essential in supporting dramatic changes in how residents travel in the future. Because of this, scoping necessarily must include an unusually heavy dose of planning for profound societal change.

The state’s SB 32 goal of a 40% GHG reduction will require a significant VMT reduction.

In its evaluation of the role of the transportation system in meeting the statewide emissions targets, CARB determined that VMT reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs) are necessary. (2017 Scoping Plan, ARB, p. 101.)
Expanded use of transit will be a critical strategy for achieving VMT reduction. TRANSDEF expects that the single most important determination to be made by the scoping process for this project will be setting an aggressive yet achievable 2050 mode split target for Marin. The transit mode share will then determine the design capacity for SRTC.

We suspect the design capacity for SRTC needs to be at least an order of magnitude higher than current patronage levels. We suggest achieving that by building into the project the ability to expand. This means controlling an adequately sized land package, even if part of it remains in non-transit interim uses. We expect that the transit uses will expand as higher shares of the population start to use the Center.

The introduction of autonomous vehicles can be handled as part of providing the expansion capacity called for above. It isn’t necessary to do detailed planning for these services now, as long as the space for them has been allocated.

Impact Analyses
Evaluate whether the proposed project will impede the State’s efforts to achieve its SB 32 targets.

Thank you for this opportunity to submit these abbreviated comments.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Attachment: TRANSDEF Marin Voice
Increasing bridge tolls won’t reduce Bay Area traffic

By David Schoenbrun

This is the year for transportation funding. Voters will be asked in June to approve increased bridge tolls and in November to extend the Marin transportation sales tax. These measures are supposed to reduce traffic. To help you evaluate how likely that reduction in traffic is, we offer our explanation of the root cause of traffic congestion.

Marin’s towns grew up around railroad stations. Motorcars didn’t exist back then. Whether it was commuting to San Francisco or sending milk to market, travel was by train or horse. The widespread adoption of the car enabled suburban homes to be built far away from train stations, inhibiting walking there. Most often, there are no convenient alternatives to driving alone.

The post-war suburbanization boom has run smack into physical limits, now that 7 million people live in the Bay Area. With 65 percent of commuters driving alone, the roadways physically can’t fit all their vehicles. (In a second, entirely independent crisis, motor vehicles are the largest source of greenhouse gases in the county.) With 2 million more Bay Area residents expected in the coming decades, congestion and greenhouse gas emissions will only get worse.

Congestion is a result of the affordability of cars mixed with widespread suburbanization. Avoiding gridlock will take a shift from driving alone to shared travel, calling for learning new travel habits. The place to start is making carpool lanes flow freely during congested periods. The resulting significantly faster travel time will provide enough incentive for some drivers to carpool. New smartphone ridesharing apps similar to Uber make it convenient to pick up a passenger living nearby, going to a similar destination.

Heavy promotion of ridesharing would create a large pool of potential passengers, increasing the likelihood of being picked up.

Improving mobility will require a new set of regional priorities favoring carpooling and transit over solo driving. To round off the package, a network of convenient bus lines, cost-effective rail lines and protected bike lanes will provide alternatives to driving.

In other parts of the country, like Portland, one can easily get around without a car. The City of Seattle’s voters approved a comprehensive bus network and achieved a major shift away from solo driving. Bay Area residents might want to make a similar choice to have a brighter future. Unfortunately, such an option is not on the ballot.

The sponsors of Regional Measure 3, the proposed $5 billion bridge toll increase on the June ballot, admit that traffic is heading towards gridlock: “This is our chance to reduce traffic and improve our quality of life.” What they don’t have is a plan to address the fundamental problem: excessive solo driving.

The Metropolitan Transportation Commission has set the Bay Area’s transportation priorities for decades. Traffic conditions in the region have steadily worsened over that time, probably because MTC’s ongoing financial support for solo driving has starved the development of alternatives to driving alone.

MTC’s own projections for 2040 show a million more cars, with total driving increasing by 21 percent and congestion delays increasing by 66 percent. With 2.5 million more daily solo driving trips than now, it’s clear the projects in the measure aren’t going to “reduce traffic.” If approved, it will lock the region into a downward spiral of congestion.

TRANSDEF.org suggests voters reject Regional Measure 3, and demand instead a better plan — one that enables large numbers of commuters to conveniently travel by shared rides, bikes and transit. A ridesharing system would do far more for long-term mobility than the projects promised in the measure — without any construction costs.

David Schoenbrun, of Sausalito, is president of TRANSDEF.org, a transit advocacy organization.

Tuesday, 05/15/2018 Pag.A09

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