



October 16, 2022

San Rafael City Council  
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San Rafael, CA 94901

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415.457.7656

**RE: Update on Downtown San Rafael Transit Center**

Honorable Mayor and Council Members,

Sustainable San Rafael looks forward to the presentation by the Golden Gate Bridge, Highway and Transportation District concerning the Final EIR for the Downtown Transit Center and response to comments on the Draft EIR, including those in the attached letter to the District dated October 12, 2021.

We provide these comments as background for the Council's review of the presentation and forthcoming Final EIR.

Thank you for your ongoing support of a strong transit system to reduce car traffic, cut greenhouse gas emissions, and support a vibrant local economy and workforce.

Sincerely,

William Carney  
SSR President

*CC: Raymond Santiago, Principle Planner, GGBHTD*



October 12, 2021

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

**RE: San Rafael Transit Center DEIR Comments**

Dear Raymond,

In our November 5, 2018 letter regarding Scoping for the San Rafael Transit Center EIR, Sustainable San Rafael requested that a number of issues be considered. We have now reviewed the Draft EIR, and the current 'build' alternatives that it analyzes, and find that most of the issues that we raised have been satisfactorily addressed.

We offer the following comments in the hope that they may inform and improve the ultimate design of the selected alternative. And we request that the Final EIR include responses to the remaining questions and requests noted below.

Our comments are grouped under key issues previously raised in our Scoping letter, which are numbered and italicized.

*1. The EIR 'aesthetics' section should analyze the 'place-making' potential of each alternative as a key impact.*

We find that the DEIR adequately addresses this issue and makes clear the significant differences in the potential of each alternative.

*2. 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.*

We request that the FEIR provide further analysis of how the opportunity sites identified in the Downtown Station Area Plan would be affected by the alternatives, including both positive and negative impacts on the development appeal of each site.

*3. 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.*

We request detailed contextual analysis of how bicycles can be safely incorporated into the heavily pedestrian Tamalpais plaza and greenway portions of the project with shared multi-use pathways, instead of the proposed 'bike-only' facilities that preclude pedestrians.

*4. The EIR 'transportation and transit' section should clearly show how the various alternatives affect the timing and efficiency of bus service, as well as traffic on surrounding streets. Information should include the routing of buses and the numbers of passengers transferring among the various transit services, as well as those bound for downtown itself.*

We find that the DEIR Appendix C ('transportation') offers clear comparisons of the bus and traffic conditions resulting from each alternative, with the Whistlestop Block options slightly more advantageous in both regards by the 2040 design date (4% less daily aggregate bus times, and 3% less daily aggregate traffic delay), using General Plan 2040 growth projections. We also note the striking statistic that 50% of passengers arrive as pedestrians, underlining the critical importance of sustaining a walkable district.

*5. The safety and amenity of passengers accessing the project needs to be paramount in the EIR 'transportation and transit' section.*

Although we believe that the DEIR adequately addresses the pedestrian access pros and cons of each alternative, we request that the FEIR include further comparison to operations at the existing Bettini Center, where for example, bus access over sidewalks has functioned for decades. We also request further information on how specific safety issues arising from the suggested additional right turn lane from Hetherton to 3<sup>rd</sup> could be addressed by eliminating the intersection's west crosswalk (replacing it with an east crosswalk) and prohibiting turns on red for both southbound and westbound traffic.

*6. 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.*

We request that the FEIR include more detailed discussion of car and taxi drop-off zones, including the capacity and ease of use for each alternative. This discussion should include supplemental zones along West Tamalpais south of 3<sup>rd</sup>, and East Tamalpais north of 4<sup>th</sup>, better serving drop-off traffic approaching from both east and west. Enhanced pedestrian pathways from the park-and-ride lots under the freeway should also be discussed, together with restriping, repaving and perhaps reconfiguration to improve usage of the lots and pedestrian access to the East End of 4<sup>th</sup> Street.

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

The FEIR would be strengthened by further discussion of the changes to mobility systems now underway or reasonably anticipated, and the capacity of each alternative to accommodate such changes.

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

We request that the FEIR include discussion of retaining public ownership of the Bettini site by ground-leasing development rights.

*9. 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.*

We request further information on the noise and exhaust from the freeway that could make alternatives unpleasant and unhealthy places to wait, and what if any mitigations could lessen these impacts.

*10. 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.*

We find that the DEIR adequately addresses cultural resources, including creative rehabilitation of the former depot building.

*11. 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.*

We request that the FEIR discuss how the 'gateway' quality of the new transit center could be heightened by planting large street trees (like the London Plane trees now thriving on 5<sup>th</sup> Avenue) along Hetherton, Irwin and Tamalpais, and within the transit plaza itself.

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

We request that the FEIR elaborate on the potential that the 2-story depot building and open transit uses could provide a visual commons at San Rafael's front door, which would avoid the walling off of downtown as adjacent blocks are developed with taller building. This could also help preserve the view corridor along Tamalpais and the train tracks from 2<sup>nd</sup> Street to Mission, keeping the city's defining hillsides in view.

Sustainable San Rafael also concurs with the City's request that the FEIR provide further information regarding the impacts and potential mitigations of sea level rise for each alternative. In addition we ask that additional GHG mitigations be included sufficient to bring the project to zero net greenhouse gas emissions by 2045, in accordance with San Rafael's Climate Action Plan 2030 as amended on September 20, 2021.

Thank you and your team for a range of transit-friendly concepts and for supporting thoughtful public decision-making with a thorough FEIR.

Sincerely,

William Carney  
President, Sustainable San Rafael

Copies: Mayor Kate Colin, SR City Council, Jim Schutz, Bill Guerin, Alicia Giudice