



April 5, 2021

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San Rafael City Council
14 Fifth Avenue
San Rafael, CA 94901

RE: Comments on General Plan 2040, Downtown Precise Plan, and Draft Environmental Impact Report

Honorable Mayor and Council Members,
We wish to supplement the correspondence related to these items with our attached previously submitted comments.

Thanks very much for your consideration.

Sincerely,

William Carney
Board President

Attachments:

3/9/21 SSR Letter re. General Plan DEIR
2/17/21 SSR Letter re. Downtown Plan

Copies:

Paul Jensen, Alicia Giudice, Barry Miller, Cory Bytof



March 9, 2021

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San Rafael Planning Commission
14 Fifth Avenue
San Rafael, CA 94901

RE: Comments on Draft Environmental Impact Report for General Plan 2040 and Downtown Precise Plan

Honorable Commissioners,

The fact that the Draft EIR finds the greenhouse gas (GHG) impacts of General Plan 2040 to be “significant and unavoidable” (p. 4.8-26) is a major wake-up call for San Rafael to increase its actions to reduce climate change.

The DEIR projects a 20% reduction of GHG (from 2019 levels) by 2040, while stating that a 60% reduction by then would be required to meet state law (table 4.5-5).

Contrary to the report’s statement, these GHG impacts are not unavoidable. Although meeting emission goals statewide may entail “advancements in technologies” (p. 4.8-27), that is not the case for the requisite amount of local emission reductions, for which compliant technologies already exist in all the emission sectors the DEIR lists (e.g., GHG-free electricity, electric heat pumps and appliances, electric vehicles, and organics recycling).

Accordingly, we request that these significant GHG impacts be mitigated by adding the following language to the General Plan:

1. [New] **Program C-5.1D: CCAP Implementation and Updates.** Conduct complete updates of the Climate Action Plan at least every ten years, adjusting programs to assure implementation of GHG goals, including reductions of 40% by 2030, 60% by 2040, and to levels conforming to Executive Orders S-03-05 and B-55-18 by 2050, or greater goals as may be adopted.
2. **Program C-4.1D: Reducing Natural Gas Use.** ~~Promote~~ Implement electrification of building systems and appliances in new buildings and those that currently use natural gas by requiring new or replacement furnaces and appliances to be electric and to utilize fossil-free electricity.
3. **Program M-3.6A: ZEV Plan.** Consistent with the San Rafael CCAP, develop and implement a Zero Emission Vehicle (ZEV) Plan with a goal of 25 percent of the passenger vehicles in San Rafael being ZEVs by 2030, and 60% by 2040. The Plan should provide for additional charging stations, preferential parking

for ZEVs, and other programs that incentivize ZEV use by San Rafael residents.

4. Program CSI-4.17E: Community Composting. ~~Consider~~ Implement a mandatory community-scale program for curbside collection, ~~and~~ composting, or other low-emission conversion of food and green waste, as well as vegetation cleared through fire prevention efforts, in compliance with SB 1383 requirements to divert at least 75% of organics.

By implementing low-emission building electrification, transportation, and waste management as mitigations to General Plan 2040, the required 60% reduction of GHG is readily achievable over the next 20 years, placing San Rafael on a solid trajectory toward carbon neutral.

As the DEIR makes clear, it is now necessary for the City to step up to these more robust programs and requirements, with supporting ordinances and incentives finalized as soon as possible. To assist that effort, model ordinances already exist from the State, County, and other jurisdictions, along with incentive programs at MCE, TAM, and other partner agencies.

The DEIR could also be furthered strengthened by a) an explanation of how the 40% GHG reductions itemized in San Rafael's CCAP 2030 figure in the DEIR's GHG calculations and determinations, along with the numerous policies and programs in General Plan 2040 itself that target additional reductions; and b) a clear description of the applicability of Executive Order B-55-18, which calls for carbon neutrality by 2045.

Overall, we commend General Plan 2040 and the Downtown Precise Plan for recommending a comprehensive range of actions to address both climate change and the other issues shaping the City's future.

Sincerely,

William Carney
Board President

Copies:

Paul Jensen, Alicia Giudice, Barry Miller, Cory Bytof



February 17, 2021

San Rafael Design Review Board
14 Fifth Avenue
San Rafael, CA 94901

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RE: Comments on Downtown Precise Plan

Dear Design Review Board Members,
Sustainable San Rafael has reviewed the revised Downtown Precise Plan, and we forward the attached comments for your consideration. Among the major themes that emerge:

Greater residential densities at higher elevations, including 5th Avenue, upper Lincoln Avenue, and 4th Street at E.

Plazas at key nodes, including the 'Transit Plaza,' A Street, E Street, and the West End. *Extending 4th Street design treatments under the freeway to Montecito, with a key node at 4th & Grand.*

A walkable downtown, with all streets and paths providing ample space for a safe and pleasant pedestrian experience, and with *traffic calming improvements* especially on 4th Street.

Enhanced connection to nature, including street trees, bio-swales, creek and wetland restorations, and *preserving sunlight on the north sidewalk of 4th Street.* (See V-c.)

A stronger waterfront, adapted to sea level rise.

Enhanced historical resources, including in the gateway district and along 4th Street and B Street.

Code improvements supporting more downtown housing development, *especially affordable workforce housing.*

Overall, we believe that the Downtown Plan provides a solid blueprint for the future of the heart of San Rafael. We look forward to your discussion of ways to continue evolving a vital and welcoming Downtown.

Sincerely,

William Carney
Board President

Comments attached

Copies:

Paul Jensen, Alicia Giudice, Barry Miller

Downtown Precise Plan Comments

(1/11/21 SSR comments on 12/20 Downtown Plan Public Review Draft)

I. Transit Station Area

I-a. **'Transit Plaza' gateway** along West Tamalpais, centered on low-scale Depot building, is promising. Allow sale of air right TDRs to compensate Whistlestop, while preserving the Depot. Extend north to Mission and south to 2nd. Consider multi-use path (instead of bike-only) to maximize space for pedestrians.

I-b. **Use existing portion of Bettini Center** on the east side of West Tamalpais between 3rd and 2nd (west of the train tracks) to extend 'plaza' treatments, while integrating them with potential bus stops and/or passenger drop-off zones.

I-c. **One-way portion of West Francisco** could be converted to bicycles and pedestrians only, especially if 'urban wetland' is implemented.

I-d. **'Urban wetland' concept for Mahon Creek.** Valuable precursor of potential adaptations to sea level rise, extending the Montecito waterfront into the gateway district. Integrate with the 'paseo' walkway concept (as shown along the south side of 2nd between W. Tamalpais and Irwin), the proposed Irwin Creek restoration, and the walkway at the east elevation of the Biomarin garage.

I-e. **Extend downtown parking district** east to Hetherton, relieving pressure to deaden ground floors with cars and incentivizing development.

I-f. **Show the two opportunity sites west of Irwin** at 4th Street. These could be key for connecting 4th Street retail and pedestrians into Montecito. (Fig. 4.24)

I-g. **Consider denser residential up Lincoln** north of Mission, extending 'downtown housing' within a 10-minute walking radius of the transit center.

I-h. **Consider dense 5th Avenue residential** corridor from W. Tamalpais to C Street (especially on north side), welcoming residential downtown and starting long-term sea level rise adaptation with "higher densities at higher elevations." Create residential enclave and pedestrian streetscape by discouraging through traffic on 5th east of Court Street.

II. Downtown Core

II-a. **'Shared Street' concept for 4th Street.** Consider extending treatment another block west (to B Street), better capturing the true 'core' of downtown and connecting to the most important north-south pedestrian corridor. Or consider limiting the treatment to emphasize the 'town center plaza' at A to Court and the 'gateway plaza' at W. Tamalpais to Hetherton. Or start with these key places to pilot 'shared street' concept and discourage 4th St. through traffic.

II-b. **'Courthouse Plaza' Revision.** Revisions like some of those shown (p. 89) could transform this existing green space into a true commons at the center of downtown—especially the simple steps up from sidewalk to grass along this entire frontage. But keep it simple and avoid structures in the open space.

II-c. Note role of large well-maintained **street trees** to humanize the scale of 4th.

II-d. **Emphasize B St.** as significant pedestrian connection from 4th St. core south through historic district to Albert Park, and north to new hotel and Boyd Park. (See 'public realm framework,' p. 67.) Return to **2-way traffic on B.**

II-e. **Add Elks 'opportunity site'** for housing & estate historic district along Mission from Boyd House to Falkirk. Provide Boyd Park trail access up hill.

II-f. **Add 'pedestrian crossing safety treatments'** where identified 'pedestrian priority streets' cross 2nd & 3rd Streets (B, A, Lindaro, Tamalpais & Grand, p.67).

II-g. **Solve west side Lindaro / 3rd St. crossing,** including consideration of making Lindaro one-way southbound between 3rd and 2nd. This would allow a west crosswalk where there is currently none, with a pedestrian-only cycle for all crosswalks, without changing the 3rd St. cycles and greatly increasing safety along this important route from the Biomarin campus and Whistlestop to 4th St.

II-h. **Enhance the Albert Park 'key pedestrian corridor'** by redesigning the south and east edges of the park to continue the Mahon Creek multi-use path and stream restoration to B St. (p. 67).

II-i. **Emphasize '4th Street Heights' residential node** extending from E St. east to D and west to Shaver. This 2-block zone could bracket both the Downtown Core and West End, modulating the mile-long linearity of 4th Street. The new residential development shown here (pages 87 and 93) should be centered on the intersection of E St. and 4th St. While continuing ground floor retail, the predominant character should be residential—vitalizing the street and well above the encroaching Bay. Consider extending the 60/80 height zone west to E.

III. West End Village

III-a See '4th Street Heights' comments above (II-i.) Anchor this underutilized opportunity zone with a small open space at s.w. corner of 4th & E intersection.

III-b. Return to multi-use path along tight south side of 2nd (not bike-only path).

III-c. Call for enhanced boulevard treatment out 'Miracle Mile.'

IV. Montecito Area

IV-a. **Create a real waterfront** by flipping the shopping center to face a generous, full-length plaza along the Canal. Step up plaza to elevate base of

building above projected sea level rise; step down plaza to water's edge to gauge its rise, tidally and as sea level rises. Create podium structure over existing parking area for service and several levels of parking, faced with small retail along 2nd/3rd Streets, and perhaps capped with residential. Reference Canal design plan for additional waterfront treatments and connections. Integrate with development of comprehensive citywide Sea Level Rise Adaptation Plan.

IV-b. **Suggest water taxi service** from plaza, connecting to Terrapin Crossroads, Canal Street, Pickleweed, Spinnaker, Shoreline Center and beyond.

IV-c. **Plan for houseboat developments** along reclaimed south side of Canal.

IV-d. **Increase pedestrian & bike amenities** along Grand Ave. and other 'pedestrian priority' and 'pedestrian corridor' streets (p.67) to help overcome dominance of cars and connect district to East Francisco and Dominican. But assure that bike-only lanes do not decrease space for pedestrians and trees.

IV-e. **Treat 4th St. as extension of downtown**, with similar pedestrian vitality, street improvements, and development standards (albeit lower scale to fit the Montecito neighborhood). Emphasize 4th & Grand intersection as a key node. Enhance pedestrian access and visual axis into SR High School.

V. Urban Form & Codes (Chapters 4, 6 and 9)

V-a. **Consider increasing height/density bonuses** for key sites, districts & uses (e.g., 4th St. Heights; 5th Ave. residential enclave; Lincoln to Paloma transit residential.)

V-b. **Consider TDRs** to transfer residential densities from Bay shoreline to higher elevations.

V-c. **Require solar studies**, upper-floor setbacks & height adjustments on south side of 4th St. to preserve as much sun as possible along the north sidewalk.

V-d. **Eliminate FAR limits** when applying 'form-based' residential zoning.

V-e. **Complete Streets** must include adequate space for pedestrians and street trees and other landscaping. Bike-only "facilities" (pages 144 – 149) must not displace existing or proposed multi-use paths (e.g. those promised by SMART) or unduly constrain safe and pleasant walking. Walkability is key to the success of downtown retail and housing.