



July 18, 2024

Mr. Ray Cassidy
P.O. Box 150173
San Rafael, CA 94915

Response to City Comments on the Draft Transportation Impact Study for the Dominican Valley Subdivision Project

Dear Mr. Cassidy;

We are in receipt of comments from a peer review of the *Draft Transportation Impact Study for the Dominican Valley Subdivision Project*, as provided in a memorandum dated April 5, 2024, from Mr. Bob Grandy and Mr. Neil Smolen of Fehr and Peers. Provided below are each of the comments followed by our responses. Comments are referenced in accordance with their description in the memorandum; the numbered comments listed below correspond with the numbers used in the comment letter.

Comment re: Trip Generation: We recommend using the average rate provided by ITE for multi-family dwelling units (ITE land use code 220) to estimate trip generation for the 14 JADUs (junior accessory dwelling units), which would be in addition to the trip generation for the accompanying 27 single family homes.

Response to Comment re: Trip Generation: The trip generation was modified as suggested, the revised Table 1 is provided below and has been included in the final version of the traffic study.

Table 1 – Trip Generation Summary

Land Use	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
SF Detached Housing	27 du	9.43	255	0.70	19	5	14	0.94	25	16	9
Multifamily Housing	14 du	6.74	94	0.40	6	1	5	0.51	7	4	3
SF Attached Housing	23 du	7.20	166	0.48	11	3	8	0.57	13	8	5
Total			515		36	9	27		45	28	17

Note: SF = Single Family; du = dwelling unit

Applying this rate, the project would generate an additional six trips during the a.m. peak hour and seven trips during the p.m. peak hour compared with the estimate used in for the analysis presented in the draft TIS. This estimate is conservative, as ADUs are defined as being no more than 500 square feet in floor area, which generally equates to the size of a studio apartment; since multifamily units could contain one or more bedrooms, the proposed units would likely have fewer occupants than would be reflected by using standard trip generation rates. In addition, given the size of the ADUs and their location in the part of the project located along the east side of Deer Park Avenue, it is expected that these units would be occupied by family members of the owners of the primary house. Based on the smaller number of residents per unit and their expected commute patterns, the number of project trips would likely be lower than the estimate based on standard ITE rates, and it is expected that the addition of ADU trips to the trip generation estimate would result in a nominal change in peak hour trips.

Comment re: Study Intersections: We recommend adding the intersections of Grand Avenue/Linden Lane and Grand Avenue/Mission Avenue to the two proposed locations (Grand Avenue/Jewell Street and Grand Avenue/Locust Avenue)

for the LOS assessment. Please provide figures with intersection volumes for all the LOS study scenarios as well as a "project trip" only figure.

Response to Comment re: Study Intersections: The LOS analysis presented in the draft TIS included the Grand Avenue/Mission Avenue intersection, which was determined to operate acceptably under all analysis scenarios. Consideration was given to analyzing the potential adverse effects of the project on the Grand Avenue/Linden Lane intersection. However, based on its location relative to the project it is expected to attract few peak hour trips with turning movements as drivers traveling between the project and downtown or US 101 South would likely use Grand Avenue rather than Linden Avenue to cross US 101. While recent turning movement counts were not collected at that location, traffic counts collected in 1996 indicated that volumes at the Grand Avenue/Mission Avenue intersection were more than double those at the Grand Avenue/Linden Avenue intersection and, given the amount of nearby development since that time, the relative volumes at these two intersections are likely to be similar. Therefore, since operations at Grand Avenue/Mission Avenue remain acceptable under Future plus Project volumes, it can reasonably be concluded that Grand Avenue/Linden Avenue would similarly be expected to operate acceptably under future volumes, without or with the project.

Figures 3, 4, 5, and 6 in the draft TIS display volumes for all scenarios, including project only trips.

Comment 1): Adequacy of Parking

Comment 1a): Assess whether there is sufficient project parking as well as whether existing on-street parking for the Golden Hill Fire Road trailhead will be eliminated with the project. If there is a parking deficiency as a result of the assessment, identify any secondary impacts that may result from the deficiency such as the utilization of unmarked on-street parking and the impact that may have on traffic circulation on narrow roads in the project vicinity, including the ability of emergency vehicles to access the project, adjacent housing, and the adjacent open space trail head. If a secondary impact is identified, describe a mitigation measure to address.

Response to Comment 1a: Along Gold Hill Grade, the existing pavement is approximately 18 feet wide, and on the south side of Gold Hill Grade is an unpaved area approximately 15 to 18 feet wide that is used for trailhead parking, with vehicles parked perpendicular to the street. The project plans indicate the intent to widen the paved area on Gold Hill Grade to 26 feet, which meets San Rafael Fire Department emergency access requirements. This widening of the paved portion of the roadway would therefore reduce the width of the area currently used for parking. While the 26-foot paved roadway would need to remain clear for emergency access purposes, a portion of the unpaved parking area would not be impacted by the widening and this area could potentially be used to accommodate vehicles parked parallel to the roadway. Parallel parking would not accommodate as many vehicles as perpendicular parking at this location; the available parking capacity after the completion of the project cannot be determined without a more precise assessment of the available space in the unpaved area.

The project does not include any use of the public right-of-way; it only proposes widening the roadway to meet San Rafael Fire Department emergency access requirements within the existing public right-of-way. Since the City has jurisdiction over the configuration of the roadway and whether parking is permitted within the public right-of-way, there is no nexus between the project and changes to the available parking at the trailhead.

Comment 1b): Determine both the required amount of parking per City parking standards as well as parking demand for both weekday and weekend peak hours based on ITE Parking Generation rates.

Response to Comment 1b: The TIS evaluated the project's proposed parking supply based on conformance to City of San Rafael code requirements.

The City requires two spaces for each unit of single-family housing, townhomes, and for each unit in a duplex. The average parking generation rates published by ITE are all less than two spaces per unit. The project proposes a parking supply that exceeds City requirements, therefore it would also exceed the estimated demand based on ITE standard rates. This is summarized in Table 2, which has been included in the final version of the traffic study.

Table 2 – Parking Analysis Summary

Land Use	Units	City Requirements		ITE Average Estimated Demand Weekday*	Proposed Supply
		Rate	Spaces Required		
Single-Family Housing	27 du	2 covered spaces/unit	54 covered spaces	49**	54 covered spaces, 54 guest spaces
Townhomes	17 du	2 covered spaces/unit	34 covered spaces	24	20 covered spaces, 17 guest spaces
Duplexes	6 du	2 covered spaces/unit	12 covered spaces	8	12 covered spaces, 12 guest spaces
JADU	14 du	Not required	N/A	N/A	
Total	64 du		100 covered spaces	81	86 covered spaces, 83 guest spaces
Total Proposed Parking Supply					169 spaces

Notes: du = dwelling unit; * *Parking Generation, 6th Edition*, ITE, 2023; ** rate from *Parking Generation, 4th Edition*, ITE, 2010

For multifamily units, ITE parking rates were only available for weekdays, as indicated. In addition, it is noted that ITE's *Parking Generation, 6th Edition* does not include rates for single family homes. As a result, the rate from the 4th Edition of this publication was applied regarding weekday demand only, as no rates were provided for weekends.

Comment 1c): To document existing demand for parking for the Golden Hill Fire Road trail head at the east end of Gold Hill Grade, collect and describe parking occupancy levels for both weekday and weekend conditions on the south side of Gold Hill Grade east of Deer Park Avenue. There is currently 90-degree parking provided along this segment for people accessing the trail. Identify whether the existing parking spaces are to be eliminated by the project and, if yes, any secondary impacts and potential mitigation measures as described above.

Response to Comment 1c: The availability of on-street parking at the trailhead is not related to the project. There would be an anticipated reduction in the number of parking spaces at the Gold Hill Grade trailhead as a result of the San Rafael Fire Department requirement for the applicant to widen the street. The City has jurisdiction over the roadway configuration and whether parking is permitted in the public right-of-way. See response to Comment 1a above.

Comment 2): Pedestrian Traffic – Conduct an off-site pedestrian assessment based on field review and collection of street width data for streets in the project study area including Gold Hill Grade, Deer Park Avenue, Magnolia Avenue, Palm Avenue, Margarita Drive, and Highland Avenue. Identify segments of streets with no sidewalks and paved street segments that are less than 20 feet wide. Identify key walking or biking destinations in the area surrounding the project (i.e., schools, parks, retail uses, paths or trails, etc.) and pedestrian routes between the project and those destinations. If a significant pedestrian impact is identified, describe a mitigation measure including any recommended pedestrian improvements, particularly in segments with narrow street width and/or limited visibility.

Response to Comment 2: As described in the TIS and indicated on the site plan, the project frontage streets of Gold Hill Grade, Deer Park Avenue, and Margarita Avenue will all be widened to 26 feet as part of the project. The TIS also notes that the land uses in proximity to the project are almost entirely residential, with Dominican

University and related uses being the only destinations within one-half mile of the project site. More than half of the proposed units would be accessed from Deer Park Avenue, while the remaining units on Gold Hill Grade and Margarita Avenue are farther away from the university. The existing pedestrian facilities in the project area are described in the TIS, with the exception of some narrow residential streets, sidewalks are available on the university campus and provide connectivity to the sidewalk network in central San Rafael. Due to its location in the hillside area, the San Rafael Municipal Code does not require sidewalks along the streets fronting the project. The lack of such facilities is therefore consistent with plans and policies and does not constitute an impact.

Downtown San Rafael and various commercial uses are within biking distance of the site. The City's bicycle facilities in the vicinity of the project are described in the TIS; most recently, a Class IV separated bikeway was completed along Grand Avenue, facilitating bicycle travel from the project area to shopping areas along 3rd Street and 4th Street. Otherwise, the streets in the project area are low-volume, slow speed streets where bicyclists and vehicle traffic share the roadway; the City has not identified any bicycle facilities along these streets in its bicycle and pedestrian master plan. The project is therefore compliant with City policy and the impact is less than significant.

Comment 3) Trail Open Space Access: Conduct an assessment of potential project impact on open space access (trailhead at the top of Gold Hill Grade to the San Rafael Open Space area) including identifying the effects of any existing trail access parking removal and any effect of the project including construction activities on access to the trailhead. If a significant trail access impact is identified, describe a mitigation measure.

Response to Comment 3: The fire road connection to Gold Hill Grade is within the public right-of-way. It is proposed to be paved and converted to a public street for approximately 250 feet to provide access to five of the proposed residences. Past that point, the trail would not be modified from its current conditions. As previously noted, the widening of Gold Hill Grade to 26 feet is being proposed to comply with the San Rafael Fire Department's minimum roadway width requirement; as a result of the proposed widening, emergency access would be improved for the neighborhood surrounding the project site. As noted in the response to Comment 1a, any reduction in parking capacity at the trailhead would be the result of a City decision regarding the roadway width and whether parking is permitted. Potential impacts of project construction activities on access to the trailhead and the surrounding neighborhood would need to be addressed as part of traffic control plans to be developed as part of the permitting process.

Comment 4) Residential Streets: Conduct an off-site multi-modal assessment for narrow streets as identified in Comment 2 above to identify potential impacts related to added project trips. If a significant impact is identified, determine the effectiveness and feasibility of the following off-site improvement measures to existing roadway infrastructure as components of a mitigation measure to better facilitate traffic considering the added project trips.

- *Creating as much two-way traffic as reasonably feasible (i.e., widening to 20-foot paved sections)*
- *Dashed or solid center line striping to identify travel lanes*
- *Lines to delineate areas for pedestrians*
- *Improved signage*
- *Improved shoulders*
- *Clearing vegetation that reduces effective travel lane width*

As noted in the response to Comment 2, the project will be widening all frontage streets to 26 feet. Dominican University and related land uses on campus are the only destinations located within typical walking distance from the project. A daily volume of 99 vehicles was recorded along Deer Park Avenue near the project site. Most of the proposed units would be accessed via a driveway at the intersection of Deer Park Avenue/Magnolia Avenue, which is all-way stop-controlled. The project would not affect adequacy of facilities beyond its frontages and there is no City policy requiring a developer to make improvements such as are suggested in the comment.

Comment 5) Emergency Access: Narrow streets have resulted in emergency access concerns in the past.

Response to Comment 5: As noted in Comment 2, all project frontage streets are proposed to be widened to 26 feet to meet City of San Rafael Fire Department requirements. This will provide adequate emergency access to the project and will improve emergency access to the surrounding neighborhood.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,

Barry Bergman, AICP
Senior Planner

Dalene J. Whitlock, PE (Civil, Traffic), PTOE
Senior Principal

DJW/bdb/SRA159.L1