

**Kaiser Permanente
1650 Los Gamos Drive**

Medical Office Building Project



**Prepared by
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for

**The City of San Rafael
Community Development Department**

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TABLE OF CONTENTS

Kaiser Permanente 1650 Los Gamos Drive Medical Office Building Project Response to Comments

	<u>Page</u>
Chapter 1. Introduction	1-1
1.1 CEQA Process	1-1
1.2 Method of Organization.....	1-2
Chapter 2. Agencies and Individuals Commenting on the Draft EIR	2-1
2.1 List of Comment Letters Received.....	2-1
Chapter 3. Written Comments and Responses	3-1
3.1 Introduction	3-1
3.2 Master Responses to Comments	3-1
Master Response 1	3-2
Master Response 2.....	3-5
Master Response 3.....	3-7
Master Response 4.....	3-9
Master Response 5.....	3-10
Master Response 6.....	3-11
3.3 Responses to Comments.....	3-12
Letter 1: Caltrans.....	3-13
Letter 2: County of Marin	3-30
Letter 3: State Clearinghouse	3-35
Letter 4: Michael Brook	3-38
Letter 5: Michael Sharp.....	3-45
Letter 6: Margaret Katherin	3-50
Letter 7: Chris Anderson	3-55
Letter 8: Stanon Klose	3-57
Letter 9: Richard Neilsen	3-59
Letter 10: John Rojas.....	3-63
Letter 11: Cecil Neilsen.....	3-65
Letter 12: Craig Murray	3-71
Letter 13: Sandra Levy.....	3-76
3.4 References.....	3-78
Chapter 4. Oral Comments and Responses	4-1
4.1 Introduction	4-1
4.2 Oral Comments: Draft EIR Public Hearing	4-1
Chapter 5. Mitigation Monitoring and Reporting Program	5-1
5.1 Introduction	5-1
5.2 Format.....	5-1
5.3 Enforcement.....	5-2

Figures

Figure 4.6-13 (with jurisdictional boundaries).....3-3

Tables

Table 2.1 Comments Received.....2-1

Table 5.1 Mitigation Monitoring and Reporting Program5-3

Appendix

Appendix A: City of San Rafael Development Impact Fees

Appendix B: Freeway Volumnes

CHAPTER 1

Introduction

1.1 CEQA Process

On March 9, 2018, the City of San Rafael's Community Development Department (Lead Agency) released for public review a Draft Environmental Impact Report (DEIR) for the proposed Kaiser Permanente 1650 Los Gamos Drive Medical Office Building (Project) (SCH# 2017062019). The public review and comment period for the DEIR began on March 9, 2018 and closed on April 24, 2018.

The DEIR, together with this Response to Comments document, constitutes the Final Environmental Impact Report (FEIR) for the proposed Project. The FEIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed Project and must reflect the Lead Agency's independent judgment and analysis of the anticipated physical impacts of the proposed Project on the environment (CEQA Guidelines, Section 15090).

The California Environmental Quality Act (CEQA) Guidelines (Section 15132) specifies the contents of an FEIR as follows:

“The FEIR shall consist of:

- (a) The DEIR or a revision of that draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in a summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in review and consultation process.
- (e) Any other information added by the Lead Agency.”

This Response to Comments document has been prepared pursuant to CEQA and in conformance with the *CEQA Guidelines*. This FEIR incorporates comments from public agencies and the general public and contains appropriate responses by the Lead Agency to those comments. No modifications or revisions to the DEIR resulted from the response to comments. Where appropriate, supplemental information has been provided or referenced in the supporting technical appendix.

The FEIR reflects the City's independent judgment and analysis.

1.2 Method of Organization

This Response to Comments document for the proposed Project contains information in response to comments raised during the public comment period.

This chapter, *Introduction*, describes the CEQA process and the organization of this Response to Comments document.

Chapter 2, *Agencies and Individuals Commenting on the DEIR*, lists all agencies and persons that submitted written comments on the DEIR during the public review and comment period.

Chapter 3, *Written Comments and Responses*, contains comment letters received during the public review and comment period. The responses to the comments are provided following each letter. Master responses are provided for six specific topic areas where multiple comments were made during the comment period.

Chapter 4, *Oral Comments*, contains a summary of all topics and public concerns, as well as responses to these comments, raised regarding the DEIR, and the merits of the Project, at the San Rafael public hearing on April 24, 2018.

Chapter 5, *Mitigation Monitoring and Reporting Program*, describes the identified mitigation measures and the responsible parties, tasks, and schedule for monitoring and reporting compliance.

CHAPTER 2

Agencies and Individuals Commenting on the Draft EIR

This chapter documents the comments on the DEIR that were submitted by agencies and individuals during the public review period (March 9, 2018 through April 24, 2018). During this period, comments could be submitted by letter, fax, web-portal, email, voicemail, or orally at a public meeting. There were no comments or letters received from organizations. All of the written comments received, and the responses to those comments, are presented in Chapter 3, *Comments and Responses* of this FEIR document.

A list of all comment letters and oral comments received is presented in *Section 2.1* below. In total, 13 letters were received. Oral comments were made at one city public hearing on April 24, 2018. Although the public comment period officially ended on April 24, 2018, a couple of comment letters, including the letter from the Marin County Department of Public Works (a responsible agency) were received after the comment period closed.

2.1 List of Comment Letters Received

The comment letters and e-mails received on the DEIR are grouped and numbered below in **Table 2-1**. The following agencies and individuals submitted written comments on the DEIR during the public review period. The California Department of Transportation (Caltrans) submitted two separate comment letters. These letters are assigned the same letter number.

Oral comments from six members of the public at the April 24, 2018 Planning Commission hearing, as well as those provided by the San Rafael Planning Commissioners, are also numbered below in **Table 2-1**.

Table 2.1: Comment Letters

Letter #	Author	Type	Media	Date(s)
Agencies				
1	California Department of Transportation, District 4, Patricia Maurice, Director	Agency	USPS	April 4, 2018 and April 23, 2018
2	Marin County Department of Public Works	Agency	USPS	May 11, 2018
3	State Clearinghouse (Scott Morgan, Director)	Agency	USPS	April 24, 2018
Individuals and Organizations				
4	Michael Brook	Individual	Email	April 19, 2018
5	Michael Sharp	Individual	Email	April 23, 2018
6	Margaret Kathrein	Individual	Email	April 23, 2018
7	Chris Anderson	Individual	Email	April 23, 2018

Letter #	Author	Type	Media	Date(s)
8	Stanton Klose	Individual	Email	April 22, 2018
9	Richard Nielsen	Individual	Email	April 22, 2018
10	John Rojas	Individual	Email	April 23, 2018
11	Cecil Nielsen	Individual	Email	March 30, 2018
12	Craig Murray	Individual	Email	April 26, 2018
13	Sandra Levy	Individual	Letter	April 24, 2018

Oral Comments – 1650 Los Gamos Drive DEIR Public Hearing (April 24, 2018)				
Pub-1	Reuel Brady	Oral		April 24, 2018
Pub-2	Michael Sharp	Oral		April 24, 2018
Pub-3	Craig Murray	Oral		April 24, 2018
Pub-4	Michael Brook	Oral		April 24, 2018
Pub-5	Monica Rosenberg	Oral		April 24, 2018
Pub-6	Cecil Nielson	Oral		April 24, 2018
Planning Commissioner Comments – 1650 Los Gamos Drive DEIR Public Hearing (April 24, 2018)				
PC-1	Barrett Schaefer	Oral		April 24, 2018
PC-2	Mark Lubamersky	Oral		April 24, 2018
PC-3	Larry Paul	Oral		April 24, 2018
PC-4	Jeff Schoppert	Oral		April 24, 2018
PC-5	Jack Robertson	Oral		April 24, 2018
PC-6	Sarah Loughran	Oral		April 24, 2018

CHAPTER 3

Written Comments and Responses

3.1 Introduction

This chapter contains copies of the comment letters received during the public review period on the DEIR, and the individual responses to those comments. Each comment letter has been catalogued with a number in the upper right-hand corner of the letter, reproduced, and included in its entirety, in Section 3.3, *Response to Comments*, below. Individual comments within each letter have been identified and are labeled with a bracket and number in the margin. For example, comments in Comment Letter 1 are numbered 1-1, 1-2, 1-3, and so on. Each specific comment is also included in the proceeding response to comments in *italicized* text. Immediately following each italicized comment is a response by the City intended to clarify or supplement information provided in the DEIR. Where appropriate, the reader is referred to the chapter or section in the DEIR where the requested information can be found.

Comments that are not directly related to environmental issues may be discussed or noted for the record. When a comment does not directly pertain to environmental issues analyzed in the DEIR, does not ask a question about the adequacy of the analysis contained in the DEIR, expresses an opinion related to the merits of the project, and/or does not question an element of or conclusion of the DEIR, the response notes the comment and may provide additional information where appropriate. The intent is to recognize the comment. Many comments express opinions about the merits or specific aspects of the proposed project and these are included in this Response to Comments document for consideration by the relevant City decision-making body (Planning Commission/City Council).

At the conclusion of the DEIR public comment period, the City of San Rafael held a Planning Commission public hearing on April 24, 2018. The hearing included a public comment period, where members of the public were allowed to provide oral comments on the DEIR. Following the public comment period, the members of the San Rafael Planning Commission also provided oral comments on the DEIR and the Project. The transcribed oral comments and response to those comments are included in Chapter 4.

3.2. Master Responses to Comments

The City has developed master responses to address a number of similar comments or questions in a comprehensive manner. As discussed above, the majority of the public comments received during the review of the DEIR were directed at the merits of the Project or general impact topics (traffic, air quality, etc.) as opposed to specific issues related to the analysis and conclusions included in the DEIR. As such, the master responses address general subjects, including those not related to a specific section of the DEIR, and in some cases address a number of interrelated topics discussed in various sections of the DEIR. Master responses include:

- **Master Response 1: Kaiser Permanente’s Fair-Share Contribution**
- **Master Response 2: Significant and Unavoidable Impacts**
- **Master Response 3: Parking Structure / Parking Space Requirement**
- **Master Response 4: Historical Occupancy Rates**
- **Master Response 5: AM/PM Peak Hour Vehicle Trips**
- **Master Response 6: Greenhouse Gas (GHG) Emissions**

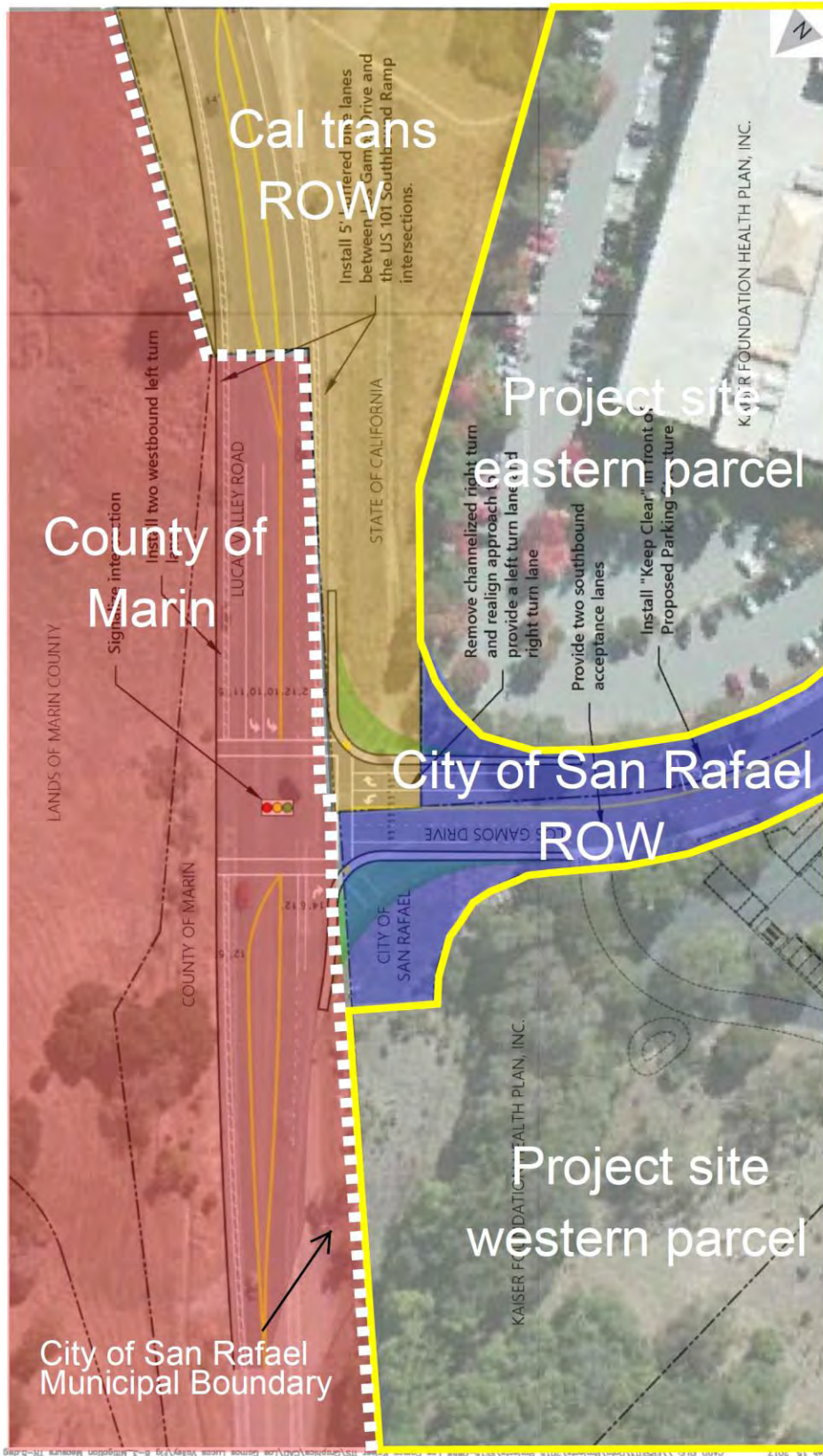
Master Response 1: Kaiser Permanente’s Fair-Share Contribution

Several commenters at the Planning Commission hearing on April 24, 2018 raised the question about Kaiser Permanente’s “fair-share” responsibility and contribution related to identified mitigation measures in Chapter 4.6, *Transportation and Circulation*. Specifically, several members of the Planning Commission requested further information regarding Kaiser’s responsibility for the planning, permitting, and ultimately construction of the proposed intersection improvement at Los Gamos Drive and Lucas Valley Road. Mitigation measures MM TRAF-1, MM TRAF-3, and MM TRAF-4 are aimed at improving the Los Gamos Drive / Lucas Valley Road and Las Gallinas Avenue / Lucas Valley Road intersections to reduce identified delays as a result of the Project and the increase in daily trips.

As discussed in mitigation measures MM TRAF-1 and MM TRAF-4, the Los Gamos Drive / Lucas Valley Road intersection is located primarily within the County of Marin jurisdiction. Furthermore, a portion of the intersection is within Caltrans jurisdiction, including a right-of-way reserved for a future potential interchange improvement for Highway US 101. **Figure 4.6-13** from the DEIR (with the various jurisdictional boundaries highlighted) is provided below to help illustrate the existing conditions. As such, any improvements to this intersection requires inter-agency coordination and approval prior to the final design, permitting, and ultimately, construction of the improvements.

As depicted in Table 4.6-6 on page 4.6-29 of the DEIR, the conversion of general office use to medical office use will result in an additional 3,765 trips in a 24-hour period to the surrounding roadway system. The total number of additional trips will cause levels of service to drop below allowable thresholds, thus triggering a need to mitigate the significance of the impact. The identified mitigation in this case is the construction of a traffic signal and associated infrastructure to reduce the delay to acceptable levels.

However, even though Kaiser would be contributing additional vehicle trips to the intersection, the majority of users of this intersection are vehicles accessing areas to the west in the County jurisdiction. Therefore, the fair-share allocation responsibility will be determined prior to Project approval to memorialize Kaiser’s contribution, as well as each agency’s contribution to the final improvement. Thus, Kaiser’s portion of the cost for intersection improvements will be based on a fair-share agreement between the various agencies and Kaiser. The fair-share agreement will take



Note: Conceptual illustration not to scale.
Source: BKF, Kaiser Permanente (2017)

Source: Fehr & Peers 2018

Figure 4.6-13: Mitigation Measure TRAF-4

into account the overall impact to the intersection (where is traffic coming from), the responsible jurisdiction, and the long-term maintenance of the intersection. In preliminary discussions with Marin County, the management and maintenance of the signal would likely be assigned to County of Marin Department of Public Works (DPW) due to the location of the signal and the type of daily users (i.e., a majority of trips would be east/west vehicles to/from County destinations). Therefore, a conceptual fair-share agreement would be structured such that Kaiser contributes a specific percentage of the overall construction improvement costs. A Memorandum of Understanding (MOU) will also be required among the various agencies to document responsibilities for the ongoing management and maintenance of the intersection.

DEIR mitigation measure MM TRAF-3, recommended to reduce impacts at the Las Gallinas Avenue / Lucas Valley Road intersection, also includes a fair-share contribution to the cost for future improvements to this intersection. However, as discussed in the DEIR, there is no identified County of Marin improvement plan or schedule for this intersection. As such, although the DEIR and the *FTIA* can identify potential solutions to reduce traffic impacts, the County of Marin DPW would ultimately determine what, when, and how the intersection would be improved. Thus, mitigation measure MM TRAF-3 requires Kaiser to pay its fair-share based on the inter-agency coordination and MOU prepared for this intersection. This fair-share fee would be agreed to for present value of anticipated improvements, and not based on a future, yet undetermined, improvement and cost. A similar coordination and review process as the Los Gamos Drive / Lucas Valley Road intersection would determine the fair-share figure included for this intersection.

Kaiser will also be required to pay a Development Impact fee for Traffic Mitigation to the City of San Rafael as part of the Project. All new development projects in the City are required to pay a Development Impact Fee that is calculated using a new project's AM and PM peak hour trip contribution to the City circulation network. This Development Impact fee for Traffic Mitigation is established via the *San Rafael General Plan 2020's* Policy C-7 that requires new development projects to pay for circulation improvements. The fee for the Project is approximately \$1,855,502 (see Appendix A: Development Impact Fee in for calculation).

The purpose of the City's Traffic Mitigation fees are to provide funding for citywide improvements as identified in the *San Rafael General Plan 2020*, not to fund a specific infrastructure improvement identified as mitigation for a specific project. However, one of the *General Plan's* identified improvements is the Los Gamos Drive / Lucas Valley Road intersection (see *General Plan 2020* Policy C-6, #2, page 172). The Project's Traffic Mitigation fee would be allocated to improvements such as this and to other projects throughout the entirety of San Rafael. The City of San Rafael would therefore be contributing funding from Traffic Mitigation fee programs to the improvement of the intersection as identified in the *General Plan*. In addition, the County of Marin has similar traffic mitigation fee collection programs for County-wide projects, including projects in the County's Northgate Activity Center Plan Area that would also go towards the construction and maintenance of the intersection. Thus, the pool of available funds from both the City of San Rafael and the County of Marin would be factored into the final fair-share percentage that Kaiser Permanente will be responsible for.

Additionally, in Chapter 5 of the DEIR, the Applicant-Implemented Traffic Improvements Alternative proposes that Kaiser will voluntarily construct the identified intersection improvements at the Los Gamos Drive / Lucas Valley Road intersection. In addition, in this Alternative, Kaiser will also provide additional public benefits, including improving local sidewalks and pedestrian pathways adjacent to the Project site. In this Alternative, Kaiser will voluntarily fund the construction of these improvements up front, thus negating the need for a fair-share agreement to secure the cost of improvement construction. However, an MOU between the agencies will still be required to determine the ongoing maintenance and management of the improvements. Further, if the Applicant-Implemented Traffic Improvements Alternative is adopted as part of the ultimate Project approval, the City of San Rafael may implement a reimbursement agreement to refund Kaiser for improvement costs that exceed Kaiser's identified fair-share monetary responsibility.

Master Response 2: Significant and Unavoidable Impacts

Several commenters expressed concern about approving the Project even though the mitigation measures identified to reduce traffic impacts cannot be implemented solely by City of San Rafael authority and rely on the ultimate approval of other jurisdictions. Pursuant to CEQA, the purpose of an EIR is to provide decision makers with as much information about project impacts as possible so as to make an informed decision when considering all the merits, including environmental issues. This DEIR concludes that the Project would result in significant and unavoidable impacts identified in Chapter 4.6, *Transportation and Circulation*, but these can be reduced to less than significant levels through implementation of the corresponding mitigation measures. However, as explained in the DEIR, the City cannot require adoption or implementation of mitigation measures for these impacts because the identified improvements to the Los Gamos Drive / Lucas Valley Road intersection and the Las Gallinas Avenue/Lucas Valley Road intersections are located primarily within the responsibility and jurisdiction of, the County of Marin. Therefore, because implementation of the mitigation cannot be guaranteed, but rather will require coordination with other public agencies, these impacts have been concluded to be significant and unavoidable, and in order to approve the Project, the City of San Rafael would need to adopt a Statement of Overriding Considerations.

As discussed in *CEQA Guidelines Section 15091*, when approving a project, the public agency must make formal findings for each significant environmental effect identified in the EIR. In particular, the findings must explain whether and why mitigation measures and project alternatives have been accepted or rejected. Pursuant to the *CEQA Guidelines Section 15091 (a)*, the possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

When significant effects are unavoidable, a detailed “Statement of Overriding Considerations” is also separately required. Per *CEQA Guidelines Section 15093*, a Statement of Overriding Considerations requires the decision-making agency to balance, as applicable, a proposed project’s economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, against its unavoidable environmental risks when determining whether to approve the project. The Statement of Overriding Considerations provides specific reasons to justify proceeding with a project despite its significant adverse environmental impacts.

The permitting and review process required for finalizing the intersection improvements identified in the DEIR will be contingent on a coordinated effort with the City of San Rafael, the County of Marin, Caltrans and Kaiser Permanente. As explained in Master Response #1 above, a fair-share agreement, including an MOU, will be required to document each party’s contribution to the construction, management, and maintenance of the intersection improvements. In short, the intersection improvements have been identified as required, yet the overall design and construction will require further coordination and approval from the City of San Rafael, County of Marin, and Caltrans regardless of the Project’s contribution to the traffic and circulation network. Therefore, these impacts are characterized in the DEIR as significant and unavoidable.

In order for the San Rafael Planning Commission and City Council to make the findings necessary for the Statement of Overriding Considerations, the public benefits of the Project would need to outweigh the potential adverse impacts. That is, approval of Kaiser’s medical office use at 1650 Los Gamos Drive and construction of an associated parking structure would be of such economic, legal, social, technological, or other benefit to outweigh the fact that the Project would be approved without a full guarantee of how and when intersection improvements would be approved and constructed (because that information can only be determined at a later date in consultation with the other relevant public agencies). Pursuant to *CEQA Guidelines Section 21081 (a) and (b)*, the City of San Rafael may approve the Project on the basis that the proposed intersection improvements: (1) would be funded via the appropriate mitigation measures requiring Kaiser Permanente’s fair share contribution; (2) would need to be authorized by the County of Marin, and; (3) the economic and social benefits of the Project would outweigh the identified adverse environmental effects. A full staff review of the Project merits would include Project conditions of approval dictating specific benchmarks and requirements prior to any future permit issuance. Specifically, a condition of approval would be included that requires a permit from the County of Marin for the Los Gamos Drive / Lucas Valley Road intersection improvement before the City grants a final Certificate of Occupancy of the medical office building.

Under CEQA, San Rafael decision makers could approve the Project as proposed or could recommend approval of a Project Alternative. As opposed to the approval process discussed above, the Applicant-Implemented Traffic Improvements Alternative documented in Chapter 5 of the DEIR proposes that Kaiser will voluntarily construct the intersection improvements, as well as provide additional public benefits, including improving local sidewalks and pedestrian pathways

adjacent to the Project site. These contributions would amount to more than Kaiser’s “fair share” percentage identified in mitigation measures MM TRAF-1 and MM TRAF-4. As such, the Applicant-Implemented Traffic Improvements Alternative would eliminate the proposed Project’s significant and unavoidable impacts to the Los Gamos Drive / Lucas Valley Road intersection. However, adverse impacts to the Las Gallinas Avenue / Lucas Valley Road intersection would still remain due to the fact that the intersection is in the County’s jurisdiction and there is thus far no known improvement planned for the intersection. Although Kaiser would be required to pay a fair-share contribution to the upgrade of this intersection, without a potential design solution, this impact will still remain significant. As a result, a Statement of Overriding Consideration would still be required under approval of this Project Alternative to address this remaining environmental impact.

In conclusion, the overall public benefits of the Project will be addressed as part of the review of the Project merits to be presented to City of San Rafael decision makers. If the Project gets approved, it will require adopting a Statement of Overriding Considerations for one or more of the DEIR’s identified traffic mitigation measures.

Master Response 3: Parking Structure / Parking Space Requirement

A number of public comments were received concerning City parking requirements for medical office use and Kaiser’s overall need for parking on-site. Although parking is not considered an environmental impact under CEQA, the construction of the Project’s proposed parking structure was reviewed for impact thresholds related to air quality, GHG emissions, and noise. Several commenters were concerned that the parking required for the Project was excessive and would be a further contributor to air quality, GHG emissions, and noise impacts. As detailed in on page 3-12 in Chapter 3, *Project Description*, the conversion of the existing building from general office to medical office uses would require the Project to include a minimum of 651 on-site parking spaces. **Table 3.1** from the DEIR below illustrates the existing and required parking for the Project.

Table 3.1: Parking ratio for 148,000 square feet office building

	Existing (general office)	Required (medical office)	Proposed (medical office)
1650 Los Gamos Drive – eastern lot	204	n/a ¹ n/a n/a	204
1650 Los Gamos Drive – Western lot	209		476 (parking structure)
1600 Los Gamos Drive – Parking easement	42		42
Total	455	651	722²
Ratio (space/1,000 sq. ft)	3:1,000	4.4:1,000	4.85:1,000

Notes: 1.) not applicable: the parking requirement would not be allocated by parking area but a total requirement for the entirety of the medical office uses.

2.) The final number will be determined after the Design Review process for the parking structure.

Currently, the existing office building has 455 spaces allocated for general office use (including 42 spaces on the adjacent 1600 Los Gamos Drive property via a legal easement). This allotment of 455 spaces is less than the City's current required parking ratio requirements for general office use. Per the San Rafael Municipal Code, the existing development should include 3.3 parking spaces per 1,000 gross square feet (3.3:1,000 gsf), or 488 spaces total. However, the existing office building was developed in accordance with a former version of the City's Municipal Code and is therefore non-compliant with current City parking ratio requirements.

When there is a change in use on a site, additional parking is required to meet the minimum parking requirement under current City of San Rafael Municipal Code (SRMC) Section 14.18.040. For medical office uses, the City's minimum parking requirement is 4.4:1,000 gsf. Therefore, the Project would be required to provide 196 additional spaces (over the existing 455) to achieve the minimum City parking requirement of 651 spaces. Kaiser Permanente has inquired with the County of Marin regarding the short- or long-term leasing of additional spaces at the 1600 Los Gamos Drive building, but with a need of nearly 200 spaces, there is not enough surplus in the immediate area to facilitate the Kaiser Medical Office Building (MOB) Project without the development of additional parking.

Although 196 additional spaces would be required to meet the City's minimum requirement for Project approval, Kaiser is proposing an increase of an additional 28 spaces above that number, or 679 total spaces¹ (as reviewed at the July 17, 2018 Design Review Board hearing). Kaiser has stated that traditionally, a program-wide parking ratio of 5:1,000 gsf is standard for all of its outpatient medical buildings, as members are often infirm or physically unable to take advantage of alternative modes of transportation. The parking surplus ensures that Kaiser's members who do not have, or cannot access, other modes of transit can still make their appointment. In addition, Kaiser has stated that the surplus tends to improve internal circulation and reduce vehicle queuing at ingress points. Although the Project does not achieve Kaiser's traditional standard of 5:1,000 gsf, Kaiser has determined that a reduced parking ratio of 4.6:1,000 gsf will satisfy appointment scheduling at peak visitation for services proposed at the Project site.

After considering various options for addressing the parking shortfall, a parking structure is the most viable solution to provide on-site parking. The area of the proposed parking structure is terraced into the hillside and provides a reasonable design solution for the development of the structure. The profile from the rear would only extend approximately 10-feet above finished grade and would be screened from public view by mature redwood and oak trees. As documented in DEIR Chapters 4.3, 4.4 and 4.5, impacts to air quality, GHG emissions, and noise would be less than significant with the incorporation of best management practices during construction. Operational impacts of the parking structure were not found to be significant, as no sensitive receptors would be affected by the ongoing use of the structure.

¹ The parking structure reviewed in the DEIR included 476 total parking spaces. However, Kaiser has revised the final design by eliminating the partial upper ramp and reduced the total number of spaces in the structure to 433 – resulting in a total allotment of 679 total spaces for the Project.

As Kaiser has expressed a need to have more parking than required, the DEIR has evaluated ways to reduce potential significant impacts related to parking through the framework of the Project alternatives. CEQA does not require the evaluation of project impacts related to parking availability, but rather the environmental impacts associated with the physical development of the parking structure. Thus, the DEIR does not consider a smaller parking structure because doing so would not result in reducing a significant and unavoidable impact of the Project. Rather, the DEIR evaluates the Reduced Medical Office Use Alternative because that alternative would result in less traffic trips and, therefore, a reduced requirement for parking. As stated in Chapter 5, on page 5-11, *Alternative 2: Reduced Medical Office Use*, although off-site traffic and circulation improvements would not be required with adoption of this alternative, development of a parking structure would still be necessary to meet current City parking requirements.

Master Response 4: Historical Occupancy Rates

Several commenters expressed concerns regarding the change in daily vehicle trips associated with the relatively light traffic related to present conditions and the data provided for the baseline conditions used to evaluate traffic impacts as a result of the Project.

As discussed in the DEIR, the existing building has historically been 100-percent occupied with general office uses. From the time the building was constructed in the late 1970's through 2006, the building was 100-percent occupied by general office uses. From 2006 to 2016, the building occupancy ranged from 25-percent to 40-percent as a result of the Great Recession. Furthermore, the subsequent building purchase in 2015 for re-use contributed to a lower occupancy rate than usual in the last ten years.

A central purpose of CEQA is to inform decision-makers and the public about the potential environmental effects of proposed projects. The selection of an accurate baseline is essential for the informed study of a project's environmental effects. The extremely low occupancy rate that currently exists at the Project site is an anomaly and does not reflect the recent historical use of the site as a functioning general office building. Furthermore, it is reasonable to foresee that, should the Project not be approved, the building would resume 100-percent occupancy with general office uses without the need for any discretionary permit. Thus, for purposes of the DEIR analysis, the Baseline No Project and Cumulative No Project scenarios assume 100-percent office occupancy.

This analysis is supported by a recent CEQA baseline case that presents similar facts to the situation here, where an appellate court upheld a city's decision to use a shopping mall's historic occupancy rate as the baseline in an EIR for the redevelopment of the shopping mall. In *North County Advocates v. City of Carlsbad*, 241 Cal.App.4th 94 (2015) (*North County Advocates*), the court found that substantial evidence supported the city's decision because the chosen baseline was based on recent historical use for more than three decades and was consistent with the mall owner's right to fully occupy the existing mall without discretionary approvals. In addition, the court held that agencies may exercise discretion when a temporary decrease or increase in operations occurs over time. Rejecting arguments that the city must use the then-existing low occupancy of the shopping mall for baseline conditions, the court noted that fluctuating occupancy is expected and the "nature

of a shopping center” and held that it was proper to use a historic baseline to account for fluctuations. (See *North County Advocates* at 105-6).

Given the above, the Baseline condition used for the Project assumes vehicle trips associated with 100% general office uses. This 100% occupied condition would not trigger any permit requirements, nor would it be considered an environmental impact, and it would be consistent with the historical uses of the site as supported by *North County Advocates v. City of Carlsbad*.

Master Response 5: AM/PM Peak Hour Vehicle Trips

Several commenters expressed concerns regarding the change in daily vehicle trips to and from the site. As detailed in the Fehr & Peers *1650 Los Gamos Final Traffic Impact Analysis (FTIA)*, the traffic trips assigned to the proposed Project are those specific to the conversion of the medical office uses over the existing allowed general office uses. The subject property has been evaluated in the *San Rafael General Plan 2020* as an existing office building with traffic trips specific to the 100% occupancy of that use. As such, the difference, or delta, between the existing conditions and the Existing and Baseline Scenarios plus the Project, is reflected in the DEIR.

The Fehr & Peers *FTIA* and the DEIR evaluated three basic scenarios – Existing, Baseline, and Cumulative – to address the potential impacts of new vehicle trips as a result on the Project. The *FTIA* then assessed each specific scenario with the addition of the Project. The industry standard for evaluating traffic impacts is to assess intersection level of service based on peak hour volumes during the morning and evening commute periods, where the highest combination of background and project traffic would occur. The Project trip generation was estimated using rates from the ITE *Trip Generation Manual (9th Edition)* land use numbers 710 (office building) and 720 (medical office building) to determine estimated number of peak hour trips generated by the existing office uses versus the number of trips generated by the planned medical office use. The ITE standards were used to evaluate the peak hours of traffic generation, which are determined through surveys of available data over the last 20 to 30 years. Accordingly, per the 710 and 720 land use codes, the peak hours are determined as occurring from 7:00 am to 9:00 am in the morning and 4:00 pm to 6:00 pm in the evening. Within the two-hour AM Peak window (7:00 am to 9:00 am), the *FTIA* identifies and evaluates the worse-case 1-hour scenario to determine the actual “peak-hour” significance of the potential impact. The same condition is repeated for the PM peak hour. The peak times that were evaluated in the *FTIA* were based on local data that identified 7:45 am to 8:45 am as the AM peak hour and 5:00 pm to 6:00pm as the PM peak hour.

For the Existing plus Project scenario, the number of Project trips added to the roadway network is the full trip generation of the medical office use, adjusted to account for the fact that 34 percent of the building is currently occupied by office uses. For the Baseline No Project and Cumulative No Project scenarios, the 1650 Los Gamos Drive building is assumed to be 100 percent occupied by office uses, as allowed under the existing Planned Development District. Forecasts for the Baseline plus Project and Cumulative Plus Project scenarios were developed by adding the difference between the trip generation for the proposed medical office uses and the existing office uses at 100 percent occupancy. The proposed medical office use would generate 359 trips during the AM peak

hour and 536 trips during the PM peak hour, which results in a net increase of 125 additional trips during the AM peak hour and 312 net new trips during the PM peak hour, over the office use at 100 percent occupancy. As discussed above, this is presented in Table 4.6-6 on page 4.6-29 in the DEIR. At the Los Gamos Drive / Lucas Valley Road intersection (where the Project trips are most concentrated) under the Cumulative plus Project scenario, the total trips generated by the medical office use would represent 13.7 percent of total intersection trips during the AM peak hour and 19.6 percent of total intersection trips during the PM peak hour. The net trips generated by the medical office use, over those generated by the office use at 100 percent occupancy, would represent 4.7 percent of total intersection trips during the AM peak hour and 11.4 percent of total intersection trips during the PM peak hour under the Cumulative plus Project scenario.

The FTIA and the DEIR analyze specific scenarios to understand the potential transportation and circulation impacts of the proposed Project. The majority of traffic comments are not requesting information on the DEIR or its conclusions, but rather generally suggest that “traffic will get worse.” The purpose of a CEQA traffic evaluation is to understand and analyze the potential impacts of a proposed project. For this particular project, CEQA is evaluating the impacts of the Project over what is allowed by the *General Plan 2020*. It is the difference between what has been previously entitled plus the impacts of the Project, or, said another way, the incremental difference between the Baseline condition without the Project and the Baseline condition plus the Project. That said, there may be a noticeable change in traffic patterns and vehicles in the circulation network as a result of the Project, but as evaluated through CEQA, the impacts to increased congestion and delay would be mitigated to less than significant levels through the implementation of the recommended mitigation measures in the DEIR.

Master Response 6: Greenhouse Gas (GHG) Emissions

Several comments expressed concerns regarding the increase of GHG emissions during the construction of proposed improvements, as well as during operational use of the MOB, including the increase of additional vehicle trips. GHG emissions associated with development of the proposed Project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the Project vicinity, energy and water usage, and solid waste disposal.

The City of San Rafael adopted a Climate Change Action Plan (CCAP) in 2009 with the intent to comply with state and federal regulations on reducing GHG emissions, such as California’s AB 32 and SB 375 legislation. The San Rafael CCAP targets a total reduction of 25% by 2020, to be achieved as actions at other levels of government, technological improvements and local educational efforts continue to spur residents and businesses to reduce their carbon footprints. The 2011 CCAP update included the Qualified GHG Emissions Reduction Strategy, which was integrated into the City’s *General Plan 2020* pursuant to the *General Plan 2020 EIR Addendum - General Plan Amendment No. 2* (Resolution No. 13211), to include the GHG Emission Reduction Strategy to meet the requirements of the Bay Area Air Quality Management District (BAAQMD) criteria. The DEIR analysis evaluates the Project consistent with *CEQA Guidelines §15183.5* and

15064(h)(3), which allow for tiering and streamlining at the project level when a project meets the criteria of the programmatic analysis of GHG emissions (a climate action plan).

The Project will introduce new vehicles and daily users to the Project area, but as documented in the DEIR, the change of use is allowed and was evaluated for compliance and consistency with the *San Rafael General Plan 2020*. The Project is consistent with the *General Plan 2020* and therefore, would be consistent with the applicable CCAP measures if it meets the standards included in the Qualified GHG Emissions Reduction Strategy. As shown in Chapter 4.4 *GHG Emissions*, Table 4.4-1 on Page 4.4-13, the Project is consistent with the standards of the CCAP, and as result, the Project GHG emissions would be less than significant. Although construction of the parking structure and the ongoing operational activities of the Project would contribute new sources of GHG emissions, the DEIR has evaluated the environmental impacts of these new sources and found the impacts to be less than significant.

In general, design elements included as part of the Project could work towards reducing overall GHG emissions, including 39 electric vehicle (EV) charging stations in the parking structure, parking lot shading/landscaping aimed at reducing heat islands, transportation demand management (TDM) measures, recycling programs, and solar panels.

3.3 Responses to Comments

The following section includes copies of comment letters received during the public review period on the DEIR, followed by responses to the comments contained in each letter.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5523
FAX (510) 286-5559
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Governor's Office of Planning & Research

April 4, 2018

APR 04 2018

STATE CLEARINGHOUSE

04-MRN-2016-00082
MRN-101 PM 14.707
SCH# 2017062019

Mr. Sean Kennings
Community Development
City of San Rafael
1400 Fifth Avenue
San Rafael, CA 94915

Kaiser Permanente Medical Office Conversion – Draft Environmental Impact Report (DEIR)

Dear Mr. Kennings:

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 new mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). We aim to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR. This letter incorporates outstanding comments from our letter dated July 10, 2017 by reference.

Project Understanding

The applicant proposes project elements described below. At full build-out, the medical office building would contain approximately 70 health provider offices. The applicant proposes to staff the project site with 315 employees at full build out. Approximately 245 staff will be relocated from five existing Kaiser Permanente facilities in Marin County and the remaining 70 people are expected to be new employees. Access to the development will be provided by the US 101 on- and off-ramps at Lucas Valley Road and Smith Ranch Road.

- An amendment to the existing Planned Development District (PDD) zoning to add medical office space as an allowable use in the PDD and bring the existing 148,000 square foot (sf) office building located at 1650 Los Gamos in San Rafael into conformance.
- Parking structure with approximately 511 parking spaces on the existing surface parking lot located west of 1650 Los Gamos Drive, which will primarily serve Kaiser Permanente employees.
- Continued use of the 42 existing parking spaces located adjacent to 1650 Los Gamos Drive.

1-1

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Mr. Kennings, City of San Rafael
April 4, 2018
Page 2

Parking

The site currently provides approx. 3.1 parking spaces per 1,000 sf of office space. This is consistent with City zoning requirements for PDDs at the time the building was constructed. Current code requires 4.4 spaces per 1,000 sf of medical use. Therefore, compliance with current City codes requires additional spaces. Since many Kaiser Members are unable to take public transit due to health issues, Kaiser's preferred parking ratio is 5.1 spaces per 1,000 sf.

Research suggests a strong correlation between the availability of parking, the cost of parking, and the choice of commute mode. The proposed parking structure with approximately 511 parking spaces should be managed effectively to discourage drive-alone commuters. The project should be conditioned to include an operations and maintenance (O&M) plan for the parking structure that will help determine the effectiveness of TDM measures. Research also suggests that at least 20 percent of commuters who drive alone would choose to carpool or use public transit if free parking was changed to paid-parking. The national trends in lowering car-ownership and increasing use of transportation network companies (TNC), such as Uber and Lyft should be factored into determining the appropriate size of the parking structure. The project should be conditioned to include well designed designated drop-off/pick-up locations to accommodate TNC's and shuttle services. The project should consider potential shuttle service to the new Marin Civic Center SMART station.

1-2

Operations Analysis

Please identify the year freeway traffic volume data was obtained and the data source. Furnish figures showing existing mainline and on/off-ramp volumes. The on-ramp and off-ramp traffic volumes are inconsistent with the ramp intersection volumes, please reconcile this discrepancy. The Final Transportation Impact Analysis (FTIA) did not address improving conditions of the northbound and southbound queue spill-backs onto the freeway mainline under the interchange improvement scenarios.

1-3

Multimodal Planning

We commend the City for requiring the project to participate in a Transportation Demand Management (TDM) program, as well as the applicant for the proposal to deploy TDM strategies currently being implemented at nearby Kaiser Permanente facilities. The applicant should consider the installation of electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles. The project should be conditioned to implement the following:

- Construct the proposed Class II bike lanes on Lucas Valley Road as shown in the *2008 Marin County Unincorporated Area Bicycle and Pedestrian Master Plan*.
- Widen the existing narrow sidewalk on the eastern portion of the project site that leads from Lucas Valley Road/US 101 southbound on-ramp to the project parking lot. This would provide direct access to the project site for people walking and bicycling from east of the project site,

1-4

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Mr. Kennings, City of San Rafael
 April 4, 2018
 Page 3

including from the two transit stops.

- Explore options for improving transit access, such as working with Marin Transit to provide transit wayfinding signage and pedestrian refuge islands on Lucas Valley Road where the crosswalks meet the two narrow foot paths located on the south side of Lucas Valley Road to the northbound and southbound transit stops on US 101.
- Ensure sidewalk is maintained north of the site between Los Gamos Drive/US 101 southbound on-ramp.

1-4
 cont'd

Providing these connections with streets configured for alternative transportation modes will encourage employees and visitors to utilize Marin Transit Bus Routes 35 and 49 and Golden Gate Transit Bus Routes 44, 54, 58, and 70, and Marin Civic Center SMART Station, thereby potentially reducing VMT.

Travel Demand Fees

Given the potential increase in VMT and proximity to US 101, the project should be conditioned to contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve multimodal forms of transportation in the project vicinity. The fair share information should also be presented in the Mitigation Monitoring and Reporting Plan of the Final Environmental Impact Report.

1-5

Lead Agency

As the Lead Agency, the City of San Rafael is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Mitigation that includes the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

1-6

Encroachment Permit

The applicant will be required to apply for and obtain an encroachment permit for any work within Caltrans right-of-way (ROW) prior to construction. To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

1-7

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Mr. Kennings, City of San Rafael
April 4, 2018
Page 4

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

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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STATE CLEARINGHOUSE

04-MRN-2016-00082
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Mr. Sean Kennings
Community Development
City of San Rafael
1400 Fifth Avenue
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Kaiser Permanente Medical Office Conversion – Draft Environmental Impact Report (DEIR)

Dear Mr. Kennings:

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 new mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). We aim to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR. These comments are an addition to the comment letter sent April 4, 2018.

Project Understanding

The applicant proposes project elements described below. At full build-out, the medical office building would contain approximately 70 health provider offices. The applicant proposes to staff the project site with 315 employees at full build out. Approximately 245 staff will be relocated from five existing Kaiser Permanente facilities in Marin County and the remaining 70 people are expected to be new employees. Access to the development will be provided by the US 101 on- and off-ramps at Lucas Valley Road and Smith Ranch Road.

- An amendment to the existing Planned Development District (PDD) zoning to add medical office space as an allowable use in the PDD and bring the existing 148,000 square foot (sf) office building located at 1650 Los Gamos in San Rafael into conformance.
- Parking structure with approximately 511 parking spaces on the existing surface parking lot located west of 1650 Los Gamos Drive, which will primarily serve Kaiser Permanente employees.
- Continued use of the 42 existing parking spaces located adjacent to 1650 Los Gamos Drive.

1-8
(repeat
of #1-1)

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Mr. Kennings, City of San Rafael
April 23, 2018
Page 2

Operations Analysis

Please address and provide explanations in the Updated Traffic Impact Analysis (TIA) for the concerns stated below. We are concerned with the increased project generated trips on the US 101/Lucas Valley Road/Smith Ranch Road ramp terminals' ability to contain turning vehicles within available storage which will be significantly impacted. In particular, the northbound on-ramp is characterized by a small radius, uphill curve and short merge distance. The SimTraffic results for the Lucas Valley Road/US 101 northbound off-ramp intersection reveals that vehicle queues under Existing Plus Project Conditions would substantially increase during the AM peak and potentially exceed storage length resulting in queue spill-back to the freeway mainline.

1-9

Similarly, the southbound off-ramp is characterized by a small radius, downhill curve and limited storage capacity, in which queuing vehicles could encroach on the upstream traffic, again creating the potential for significant queue spill-back to the freeway mainline. Please address the implications of the percentage trip distribution and provide feasible mitigation measures to address impacts at the US 101/Lucas Valley Road/ Smith Ranch Road ramps. The California Environment Quality Act does not exempt these type of operational concerns from evaluation.

Please provide the following:

- A copy of the existing traffic data that are from Caltrans in the appendix;
- Define the observed global peak hour factor used at all intersections in the TIA;
- Freeway traffic volume diagram similar to the intersection analysis; and
- Clarify how Figure 3-2 relates to the 150 AM and 300 PM additional peak hour trips cited in the Executive Summary of the TIA.

Multimodal Planning

Signalization and Reconfiguration of the Lucas Valley Road/Los Gamos Drive Intersection (Mitigation Measure TR-4) will affect the westbound Lucas Valley Road right shoulder due to existing trees/bushes, which will need to be trimmed. In addition, the proposed bike lane improvement in both directions of Lucas Valley Road is truncated and should be extended to US 101 on-ramps to fully connect to the existing bike path, please see attached photos.

1-10

Lead Agency

As the Lead Agency, the City of San Rafael (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Mitigation that includes the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other

1-11

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April 23, 2018
Page 3

legally-binding instruments under the control of the City.

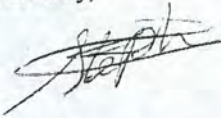
Encroachment Permit

Please be advised that any work such as tree trimming or traffic control that encroaches onto Caltrans right-of-way (ROW) requires an encroachment permit that is issued by the Department. Tree trimming requirements will be addressed in the encroachment permit process. To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information:
<http://www.dot.ca.gov/hq/traffops/developserv/permits>.

1-12

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

Sincerely,



For
PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

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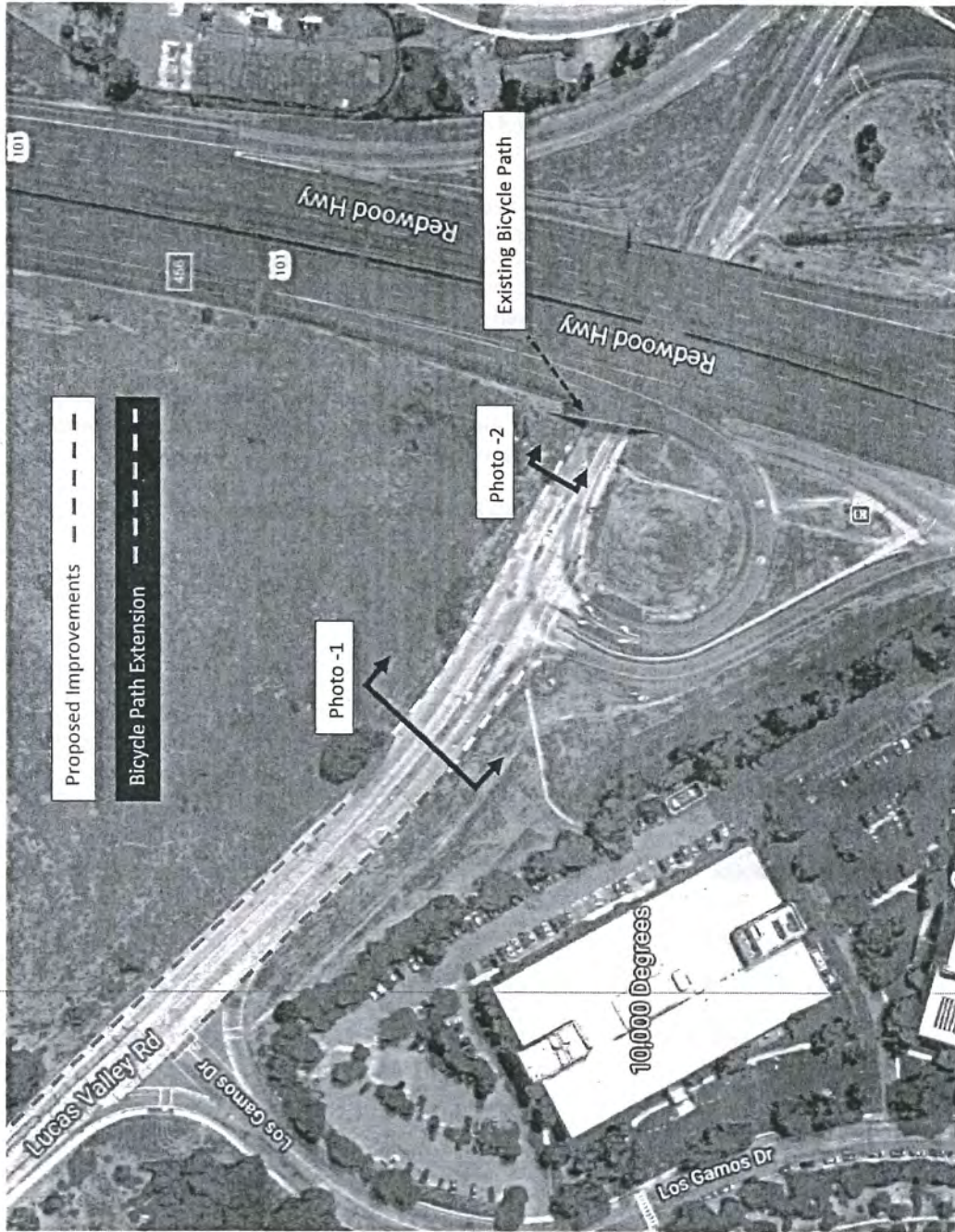


Photo -1:

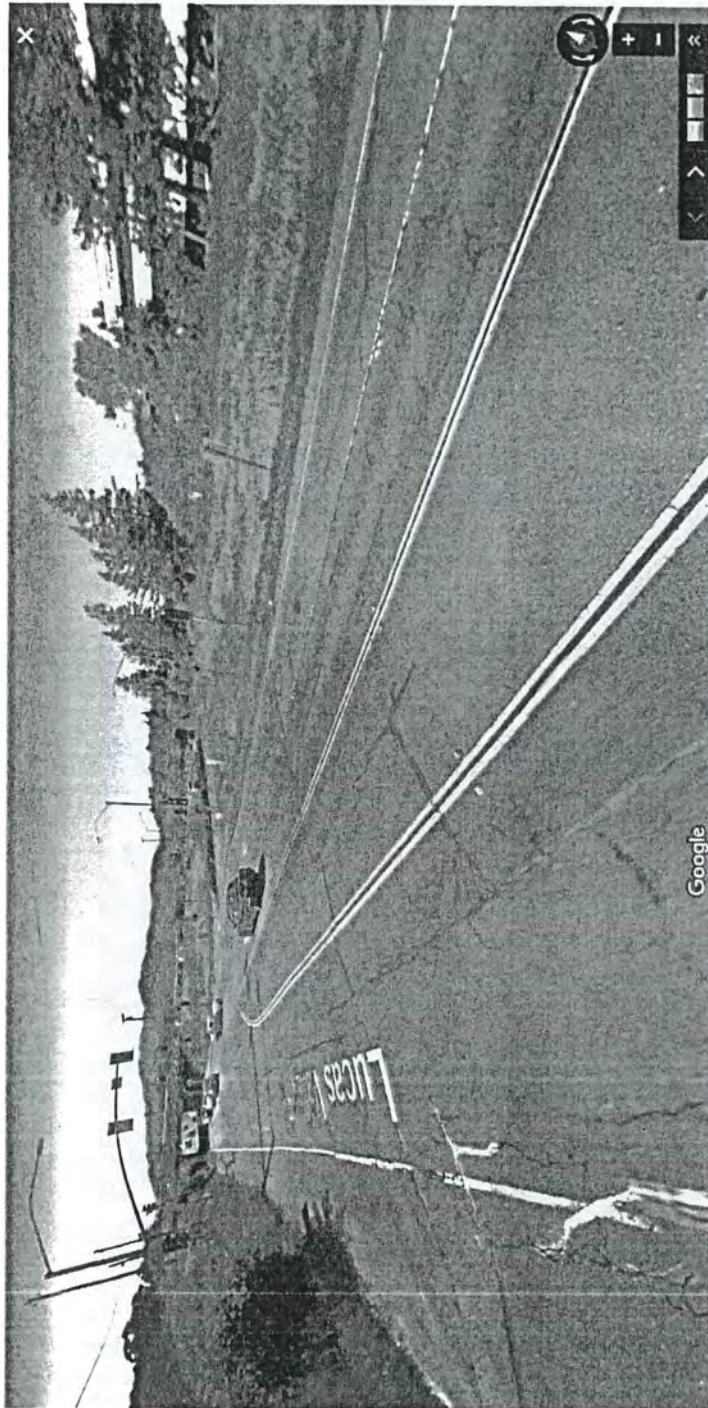
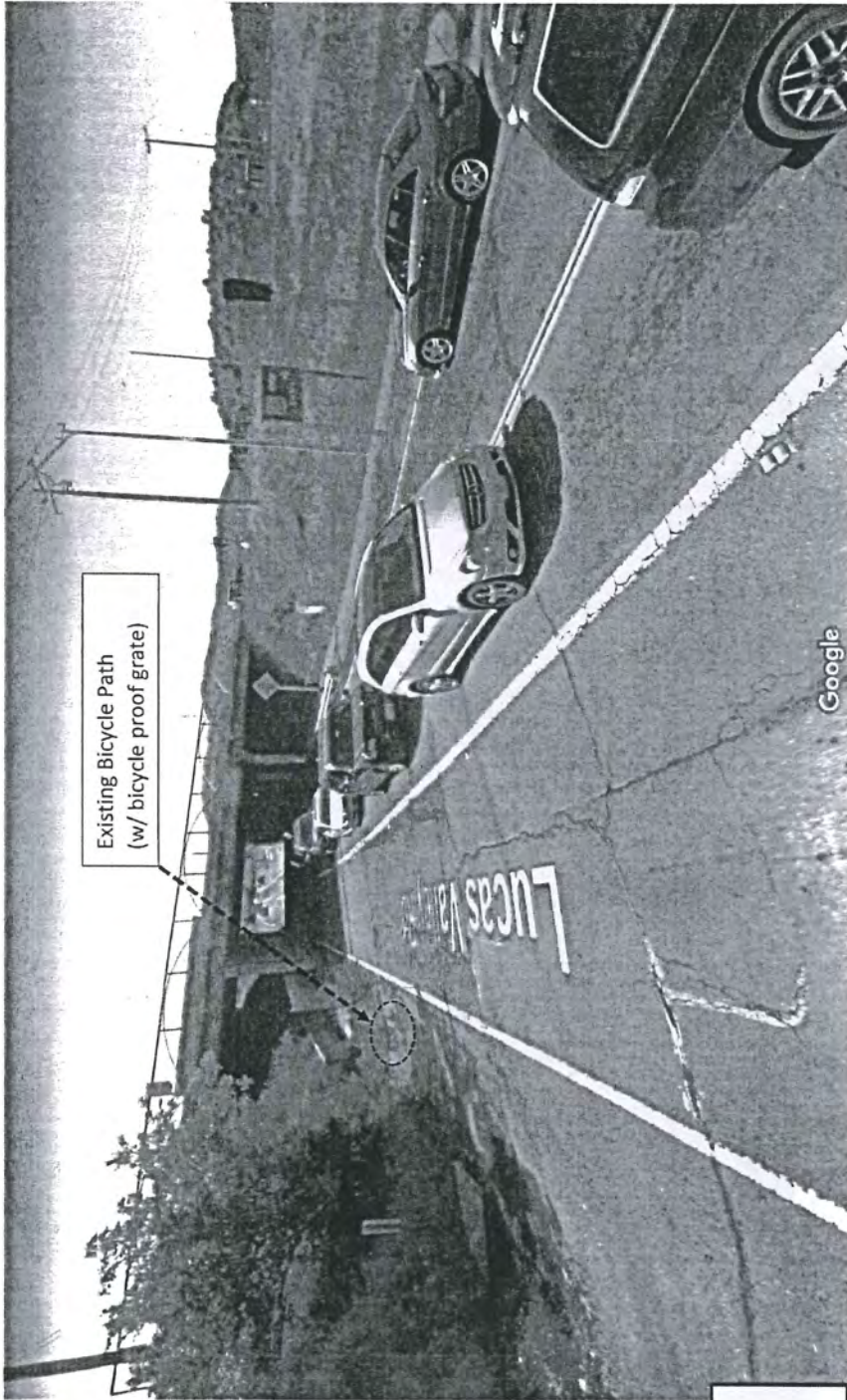
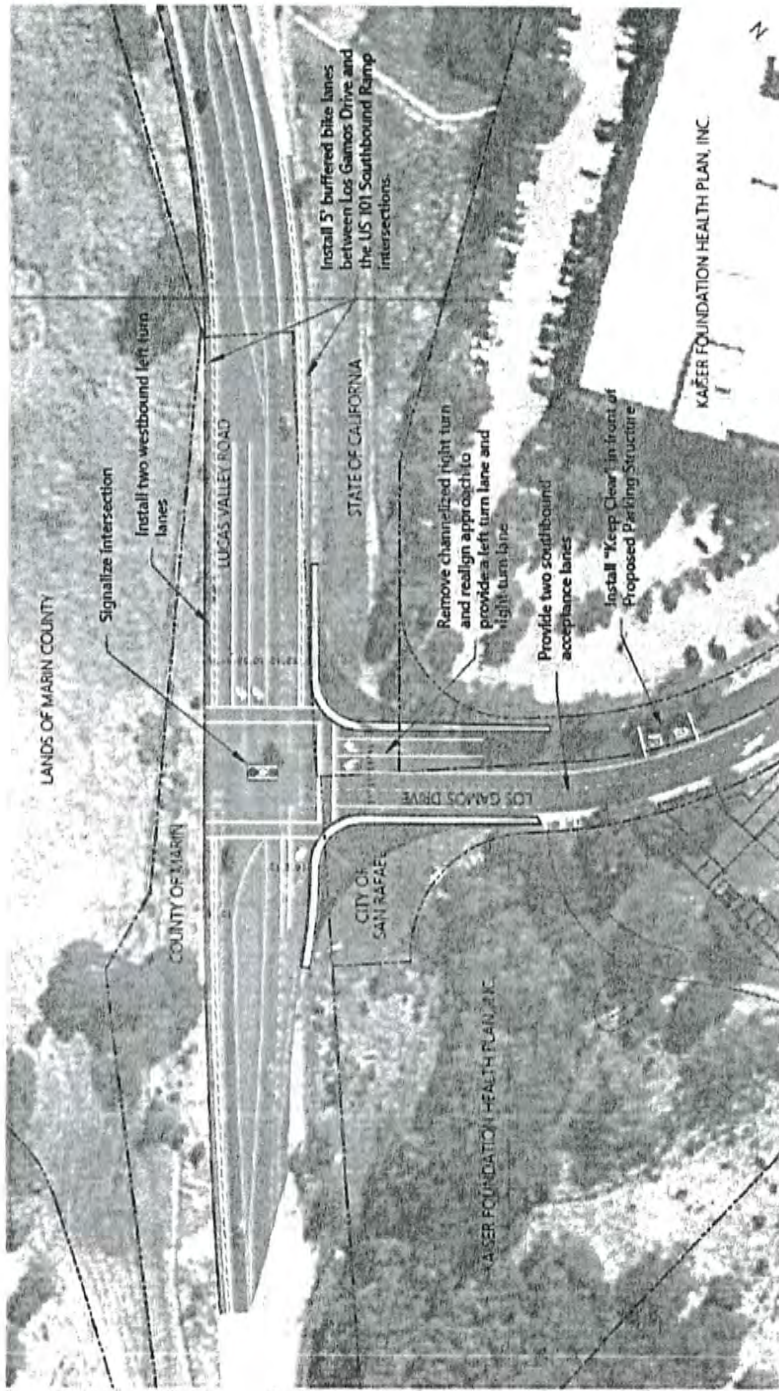


Photo -2:





Note: Conceptual illustration not to scale.
Source: BKF; Kaiser Permanente (2017)

Figure 6-3
Mitigation Measure TR-4
Signalize and Reconfigure Intersection at Lucas Valley Road / Los Gamos Drive

Letter 1 Response – California Department of Transportation

[NOTE—Caltrans submitted two comment letters, dated April 4, 2018 and April 23, 2018, respectively. These are both included in this Letter 1 Response section. Comments 1-1 through 1-7 respond to the earlier comment letter, and Comments 1-8 through 1-12 respond to the subsequent comment letter.]

Comment 1-1: *The applicant proposes project elements described below. At full build-out, the medical office building would contain approximately 70 health provider offices. The applicant proposes to staff the project site with 315 employees at full build out. Approximately 245 staff will be relocated from five existing Kaiser Permanente facilities in Marin County and the remaining 70 people are expected to be new employees. Access to the development will be provided by the US 101 on- and off-ramps at Lucas Valley Road and Smith Ranch Road.*

- *An amendment to the existing Planned Development District (PDD) zoning to add medical office space as an allowable use in the PDD and bring the existing 148,000 square foot (sf) office building located at 1650 Los Gamos in San Rafael into conformance.*
- *Parking structure with approximately 511 parking spaces on the existing surface parking lot located west of 1650 Los Gamos Drive, which will primarily serve Kaiser Permanente employees.*
- *Continued use of the 42 existing parking spaces located adjacent to 1650 Los Games Drive.*

Response to Comment 1-1:

This comment summarizes Caltrans' understanding of the Project. The City notes that both Caltrans letters' Project Understanding sections do not accurately represent the Project elements, as the letters respond to data provided in the Fehr & Peers Draft Traffic Impact Analysis (DTIA) from February 2017 and/or rely on outdated Project elements taken from the initial Project Application materials. Caltrans reviewed the DTIA as part of the inter-agency review of the formal Project application submitted to the City on February 21, 2017. As part of this inter-agency process and later Project modifications, the DTIA was subsequently revised and updated, and the FTIA (incorporating and analyzing the current Project elements) was submitted to the City in February 2018.

Most pertinent to this Response to Comments document, the DEIR analysis relies upon the FTIA. Therefore, some of Caltrans comments are not applicable to the Project as currently proposed and are noted as such below.

Comment 1-2: *Parking: The site currently provides approx. 3.1 parking spaces per 1,000 sf of office space. This is consistent with City zoning requirements for PDs at the time the building was constructed. Current code requires 4.4 spaces per 1,000 sf of medical use. Therefore, compliance with current City codes requires additional spaces. Since many Kaiser Members are unable to take public transit due to health issues, Kaiser's preferred parking ratio is 5.1 spaces per 1,000 sf. Research suggests a strong correlation between the availability of parking, the cost of parking, and the choice of commute mode. The proposed parking structure with approximately 511 parking spaces should be managed effectively to discourage drive-alone commuters. The project should be conditioned to include an*

operations and maintenance (O&M) plan for the parking structure that will help determine the effectiveness of TDM measures. Research also suggests that at least 20 percent of commuters who drive alone would choose to carpool or use public transit if free parking was changed to paid-parking. The national trends in lowering car-ownership and increasing use of transportation network companies (TNC), such as Uber and Lyft should be factored into determining the appropriate size of the parking structure. The project should be conditioned to include well designed designated drop-off/pick-up locations to accommodate TNC's and shuttle services. The project should consider potential shuttle service to the new Marin Civic Center SMART station.

Response to Comment 1-2:

Please see Master Response #3 regarding parking requirements. The comment also references an older draft version of the Traffic Impact Analysis prepared by Fehr & Peers in February 2017, and not the final TIA prepared and submitted to the City in February 2018 that serves as the basis of the DEIR transportation analysis. The parking structure analyzed in the DEIR is a maximum 476-space, three-level plus upper ramp parking structure on the existing surface parking lot located to the west of 1650 Los Gamos Drive. In addition, Kaiser's Project Description proposes a TDM program which includes a local shuttle to and from SMART Station and other Kaiser facilities in the City of San Rafael, pre-tax commuter spending accounts, subsidy for bicycle, transit or car/vanpool use, preferential parking for car/vanpools, onsite bicycle storage and employee showers, and other incentives to encourage alternative modes of transportation. The existing office building has a designated drop-off/pick-up area in front of the upper building entrance. This area has not been formally designated for TNC's or shuttle service, but the comment regarding dedicated drop off/pick-up of TNC's is noted.

Comment 1-3: *Operations Analysis. Please identify the year freeway traffic volume data was obtained and the data source. Furnish figures showing existing mainline and on/off-ramp volumes. The on-ramp and off-ramp traffic volumes are inconsistent with the ramp intersection volumes I please reconcile this discrepancy. The Final Transportation Impact Analysis (FTIA) did not address improving conditions of the northbound and southbound queue spill-backs onto the freeway mainline under the interchange improvement scenarios.*

Response to Comment 1-3:

Fehr & Peers obtained freeway volumes in September 2015 and incorporated the data in its analysis of on and off ramp volumes. As requested by Caltrans, Fehr & Peers has provided freeway volumes as a supplement to the FTIA (see Appendix A to this Response to Comment document). Fehr & Peers commented that volumes used for the analysis were General Purpose lane volumes, which does not account for vehicles in the HOV lane. The comment is requesting further information on queue spill-backs under interchange improvement scenario; however, it is not known at this time if the interchange is currently funded and additional analysis will need to be completed ahead of interchange construction. Furthermore, the interchange is not identified as a priority improvement by the Metropolitan Transportation Commission (MTC) in the 2035 Plan for the San Francisco Bay Area, or by the Transportation Authority of Marin (TAM) in the Marin Congestion Management Program 2014 Update. As detailed in the DEIR beginning on page 4.6-57, Caltrans prepared a Project Study Report (Project Development Support) [PSR (PDS)] for the US 101/Lucas Valley Interchange Improvement Project in 2003. The PSR (PDS) documents consensus between Caltrans and City of San Rafael on the purpose-and-need, scope, and schedule of a project and project development and capital costs are estimated. However, the next phase of project

development is not yet funded, and Caltrans has not provided insight to an update to the PSR (PDS) or when interchange improvements might occur. Therefore, due to the uncertainty of future interchange improvements, a queue summary was not prepared by Fehr & Peers under the interchange improvement scenario. However, Fehr & Peers did provide detailed LOS and queue outputs included in the *FTIA* technical appendix.

Comment 1-4: *Multimodal Planning: We commend the City for requiring the project to participate in a Transportation Demand Management (TDM) program, as well as the applicant for the proposal to deploy TDM strategies currently being implemented at nearby Kaiser Permanente facilities. The applicant should consider the installation of electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles. The project should be conditioned to implement the following:*

- *Construct the proposed Class II bike lanes on Lucas Valley Road as shown in the 2008 Marin County Unincorporated Area Bicycle and Pedestrian Master Plan.*
- *Widen the existing narrow sidewalk on the eastern portion of the project site that leads from Lucas Valley Road/US 101 southbound on-ramp to the project parking lot. This would provide direct access to the project site for people walking and bicycling from east of the project site, including from the two transit stops.*
- *Explore options for improving transit access, such as working with Marin Transit to provide transit wayfinding signage and pedestrian refuge islands on Lucas Valley Road where the crosswalks meet the two narrow foot paths located on the south side of Lucas Valley Road to the northbound and southbound transit stops on US 101.*
- *Ensure sidewalk is maintained north of the site between Los Gamos Drive/US 101 southbound on-ramp.*

Providing these connections with streets configured for alternative transportation modes will encourage employees and visitors to utilize Marin Transit Bus Routes 35 and 49 and Golden Gate Transit Bus Routes 44, 54, 58, and 70, and Marin Civic Center SMART Station, thereby potentially reducing VMT.

Response to Comment 1-4:

The Project proposes implementation of 39 EV charging stations, or 13 per floor of the parking structure. The improvements identified for the Los Gamos Drive / Lucas Valley Road intersection include extending Class II bike lanes, however, the final extent of the bike improvements are to be determined through inter-agency coordination, design, and development. Sidewalk improvements are also included as part of the intersection improvements but are to be determined through inter-agency coordination, design, and development. Kaiser includes a TDM Program as part of the project description and it includes providing transit information to employees. Additional improvements, such as transit wayfinding signage, improved sidewalks/pedestrian paths, and pedestrian refuge islands will be evaluated as part of the overall intersection improvement, though the extent/limits of the improvement will be determined as designs are developed.

Comment 1-5: *Travel Demand Fees: Given the potential increase in VMT and proximity to US 101, the project should be conditioned to contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve*

multimodal forms of transportation in the project vicinity. The fair share information should also be presented in the Mitigation Monitoring and Reporting Plan of the Final Environmental Impact Report.

Response to Comment 1-5:

The comment has been noted. The Project applicant is required to pay Traffic Mitigation Fees to the City of San Rafael as part of the permit process and this will be included as a condition of approval. See Master Response #1 for more details regarding this Traffic Mitigation Fee. The fair-share requirement and MOU are included as conditions in the MMRP in Chapter 5 of this Response to Comments document.

Comment 1-6: *As the Lead Agency, the City of San Rafael (City) is responsible for all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Mitigation that includes the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.*

Response to Comment 1-6:

The comment has been noted. See Master Responses #1 and #2.

Comment 1-7: *The applicant will be required to apply for and obtain an encroachment permit for any work within Caltrans right-of-way (ROW) prior to construction. To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.*

Response to Comment 1-7:

The comment has been noted.

Comment 1-8: *(Repeat of Comment 1-1 from April 4, 2018 letter)*

Comment 1-9: *Operational Analysis: Please address and provide explanations in the Updated Traffic Impact Analysis (TIA) for the concerns stated below. We are concerned with the increased project generated trips on the US 101/Lucas Valley Road/Smith Ranch Road ramp terminals ability to contain turning vehicles within available storage which will be significantly impacted. In particular, the northbound onramp is characterized by a small radius, uphill curve and short merge distance. The SimTraffic results for the Lucas Valley Road/US 101 northbound off-ramp intersection reveals that vehicle queues under Existing Plus Project Conditions would substantially increase during the AM peak and potentially exceed storage length resulting in queue spill-back to the freeway mainline. Similarly, the southbound off-ramp is characterized by a small radius, downhill curve and limited storage capacity, in which queuing vehicles could*

encroach on the upstream traffic, again creating the potential for significant queue spill-back to the freeway mainline. Please address the implications of the percentage trip distribution and provide feasible mitigation measures to address impacts at the US 101/Lucas Valley Road/ Smith Ranch Road ramps. The California Environment Quality Act does not exempt these types of operational concerns from evolution.

Please provide the following:

- *A copy of the existing traffic data that are from Caltrans in the appendix;*
- *Define the observed global peak hour factor used at all intersections in the TIA;*
- *Freeway traffic volume diagram similar to the intersection analysis; and*
- *Clarify how Figure 3-2 relates to the 150 AM and 300 PM additional peak hour trips cited in the Executive Summary of the TIA.*

Response to Comment 1-9:

Fehr & Peers prepared the *1650 Los Gamos Drive FTIA* which was used as the basis for evaluation in the DEIR. The longest queues occur during the AM peak hour for both off-ramps at the Highway 101/Lucas Valley Road interchange. Under Existing plus Project conditions, the 95th percentile queue length increases to 700 feet (from 360 feet under existing conditions) for the southbound off-ramp and 1,780 feet (from 640 feet under existing conditions) for the northbound off-ramp. The queue on the northbound off-ramp would extend into the auxiliary lane between the Freitas Parkway and Lucas Valley Road interchanges. The queue on the southbound off-ramp would not extend beyond the exit point into the southbound auxiliary lane. As such, the coordination and ultimate construction of the identified intersection improvement would also require approved signal timing changes from both the County of Marin and Caltrans.

Based on the Existing plus Project queue summary, the queues estimated for the southbound ramps show that the (average and maximum) queues are within the available storage length. A copy of the data received from Caltrans will be added as addendum to the appendix of the *FTIA* and the DEIR.

Fehr & Peers also provided these steps to calculate the global peak hour factor:

1. The global peak hour was identified by determining the 60-minute period that experienced the most amount of traffic at all study intersections.
2. The highest 15-minute interval within the 60-minute peak hour was then identified at all study intersections
3. The global peak hour was calculated by calculating the sum of all volumes in the study corridor: (60-minute volume at all study intersections) divided by 4 x (highest 15-minute interval at all study intersections)

A diagram of the freeway volumes used in the assessment has been submitted to Caltrans and included as an addendum to the *FTIA* technical appendix.

Figure 4.6-7 in the DEIR is based on the trip generation calculations presented in Table 4-6, Project trip generation estimates. The number of inbound and outbound trips equate to the 125 AM peak hour and 312 PM peak hour trips summarized in the table. The resulting Impact-2 discussion in the DEIR, beginning on page 4.6-39, concludes that potential volume to capacity ratio impacts as a result of the Project can be mitigated to less than significant levels with the successful

implementation of the Project TDM as detailed in mitigation measure MM TRAF-2 on page 4.6-43.

Comment 1-10: *Signalization and Reconfiguration of the Lucas Valley Road/Los Gamos Drive intersection (Mitigation Measure TR-4) will affect the westbound Lucas Valley Road right shoulder due to existing trees/bushes, which will need to be trimmed. In addition, the proposed bike lane improvement in both directions of Lucas Valley Road is truncated and should be extended to US 101 on-ramps to fully connect to the existing bike path, please see attached photos.*

Response to Comment 1-10:

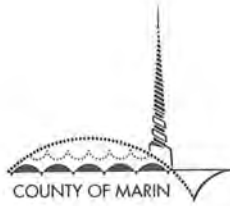
The comment is noted. Final design consideration for the intersection improvement will require consultation and coordination with Caltrans and the County of Marin Department of Public Works. The mitigation requirement for the intersection improvement is based on the nexus for vehicle traffic trips associated with medical office uses. Neither the Fehr & Peers *FTIA* nor the DEIR concluded that the Project would result in impacts to bike lanes along Lucas Valley Road. Although there is a preference to accommodate pedestrian and bicycle safety, the mitigation measures for the Project are based on vehicles impacting the circulation network. The Applicant-Implemented Traffic Improvements Alternative contemplates Kaiser voluntarily constructing additional improvements such as sidewalks and pedestrian walkways to connect the Project to the local transit stop at the US Highway 101 interchange.

Comment 1-11: *(Repeat of Comment 1-5 above.)*

Comment 1-12: *Please be advised that any work such as tree trimming or traffic control that encroaches onto Caltrans right-of-way (ROW) requires an encroachment permit that is issued by the Department. Tree trimming requirements will be addressed in the encroachment permit process. To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660. Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information:*
<http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Response to Comment 1-12:

The comment has been noted.



DEPARTMENT OF PUBLIC WORKS

Quality, Excellence, Innovation

Raul M. Rojas
DIRECTOR

May 11, 2018

Administration
PO Box 4186
San Rafael, CA 94913-4186
415 473 6528 T
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Skyler Denniston
Senior Land Use Manager
National Facilities Services
Kaiser Permanente
393 E Walnut Street, 4th Floor
Pasadena, CA 91188

**Subject: Comments on Draft Environmental Impact Report
Kaiser Permanente – 1650 Los Gamos Drive**

- Accounting
- Airport
- Building Maintenance
- Capital Projects
- Certified Unified Program Agency (CUPA)
- Communications Maintenance
- County Garage
- Disability Access
- Engineering & Survey
- Flood Control & Water Resources
- Land Development
- Purchasing
- Real Estate
- Reprographic Services
- Road Maintenance
- Stormwater Program
- Transportation & Traffic Operations
- Waste Management

Dear Ms. Denniston:

Thank you for allowing us to comment on this project; our comments are as follows:

1. MM TRAF-1 on page 4.6-38 Los Gamos Drive/Lucas Valley Road

This impact can be mitigated by the installation of the traffic signal. Signalization of the Los Gamos Drive/Lucas Valley Road intersection is included in the Marin County Sub-Regional Transportation Improvement Fee Study, dated March 2002 which includes the Northgate Activity Center Plan Area. Prior to occupancy, project proponent shall install traffic signal. Should timing not work for project proponent, DEIR shall analyze potential temporary measures to reduce the impacts in the interim between when the proposed project comes online and when the traffic signal will be installed. Potential temporary measures could include an extensive traffic demand management program, employee shuttle, partial occupancy, etc. The County will coordinate with the City of San Rafael and the project proponent on the fair share contribution towards the signalization of this intersection.

2-1

2. MM TRAF-3 on page 4.6-49 Las Gallinas Avenue/Lucas Valley Road

Although an improvement project has not yet been identified to mitigate this impact, the proposed project shall be conditioned such that if an improvement project is identified in the future, the project proponent will pay their fair share contribution towards the identified improvement project.

2-2

3. During the morning peak hour when the US 101 freeway is congested, Miller Creek Road and Las Gallinas Avenue are often used to bypass freeway traffic. This will be an attractive alternative for some employees and others going to the Kaiser facility. The Draft EIR and Fehr and Peers

2-3

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Traffic Impact Analysis should discuss this dynamic. It is noted that a large percentage of employees from the San Rafael Medical Center are anticipated to relocate to the proposed Las Gamos facility. A number of these would likely be using the Miller Creek Road/Las Gallinas bypass already and should be estimated and documented as part of the discussion/assessment. 2-3

In addition, we offer the following merit comments:

1. Page 3-18 Pedestrian and Bicycle Access says "The project will include reusing existing pedestrian walkways throughout the Project site to provide continued connections between the parking structure and the new MOB." The pedestrian crossing at the intersection of Los Gamos Drive and Lucas Valley Road is not ADA compliant. An ADA compliant pedestrian path of travel should be provided at the Los Gamos Drive intersection. 2-4

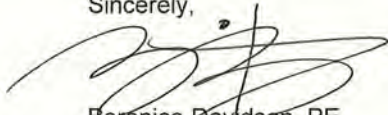
2. An encroachment permit from Marin County would be required for any work within the County road right of way at the Las Gamos Drive/Lucas Valley Road intersection. 2-5

3. All project related striping, signage, and/or improvements on Lucas Valley Road in the County road right of way shall be subject to review by the County of Marin. 2-6

4. The project design should include features to facilitate pedestrian crossing from the proposed parking structure across Las Gamos Drive to the new medical building. 2-7

Again, thank you for the opportunity to comment. We will follow up with the City of San Rafael to coordinate the discussions on calculating fair share contributions.

Sincerely,



Berenice Davidson, PE
Principal Civil Engineer

c: Raffi Boloyan, San Rafael Planning Manager
Charmine Solla, San Rafael Deputy Public Works Director
Sean Kennings, LAK Associates, LLC Planning Consultant

Robert Goralka
John Neville
Eric Steger

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Letter 2 Response – Marin County Department of Public Works

Comment 2-1: *MM TRAF-1 on page 4.6-38 Los Gamos Drive/Lucas Valley Road*

This impact can be mitigated by the installation of the traffic signal. Signalization of the Los Gamos Drive/Lucas Valley Road intersection is included in the Marin County Sub-Regional Transportation Improvement Fee Study, dated March 2002 which includes the Northgate Activity Center Plan Area. Prior to occupancy, project proponent shall install traffic signal. Should timing not work for project proponent, DEIR shall analyze potential temporary measures to reduce the impacts in the interim between when the proposed project comes online and when the traffic signal will be installed. Potential temporary measures could include an extensive traffic demand management program, employee shuttle, partial occupancy, etc. The County will coordinate with the City of San Rafael and the project proponent on the fair share contribution towards the signalization of this intersection.

Response to Comment 2-1:

The County of Marin DPW is requiring a condition to occupancy of the existing building by Kaiser in the form of installation of the traffic signal at Los Gamos Drive and Lucas Valley Road. Furthermore, the County of Marin is suggesting alternatives to signal installation, should the timing not work for Kaiser Permanente, such as TDM measures, an employee shuttle, or limits to full occupancy. As a permitting agency, the County of Marin does have the authority to impose conditions on final approval of the proposed improvements within its jurisdiction. However, overall Project approval, and implementation of the mitigation measures included in the DEIR, is the responsibility of the City of San Rafael.

Even so, a condition to require installation of the traffic signal prior to final occupancy will be the result of the coordinated and comprehensive review and approval of the Project. The DEIR evaluated the need for the intersection improvement based on the analysis provided by Fehr & Peers in the *FTIA*. Using the *Manual of Uniform Traffic Control (MUTCD) (Federal Highway Administration 2012)*, Fehr and Peers evaluated three signal warrants to assess if existing stop-controlled intersections warrant signalization. The three signal warrants were used in the *FTIA* as a supplemental analysis tool to assess operations at the unsignalized intersection of Los Gamos Drive and Lucas Valley Road. Based on the Fehr & Peers analysis, existing conditions currently meet the peak hour warrant for a signalized intersection, therefore a signal should already be considered at the intersection even without the Project. Signal warrant calculations are provided in Appendix C of the Fehr & Peers *FTIA* (and Appendix E of the DEIR).

Accordingly, mitigation measure MM TRAF-1 requires the preparation of an MOU to document the appropriate responsibilities, approvals, financing, and finally timing for the proposed improvements. Therefore, the City of San Rafael will coordinate the design and review of the proposed improvements with the County of Marin, Caltrans and Kaiser.

The requirement by the County of Marin to have the traffic signal installed prior to occupancy will be incorporated into the approvals of the proposed Project.

Comment 2-2: *MM TRAF-3 on page 4.6-49 Las Gallinas Avenue/Lucas Valley Road*

Although an improvement project has not yet been identified to mitigate this impact, the proposed project shall be conditioned such that if an improvement

project is identified in the future, the project proponent will pay their fair share contribution towards the identified improvement project.

Response to Comment 2-2:

Although mitigation is possible to address Project impacts at the Las Gallinas Avenue / Lucas Valley Road intersection, the intersection is outside of the City's jurisdiction and specific improvements have yet to be identified by either the City of San Rafael or the County of Marin. As a result, mitigation measure MM TRAF-3 does not identify potential improvements to the Las Gallinas Avenue / Lucas Valley Road intersection, but the fair-share contribution for the construction of the improvements will be included as part of an MOU necessary to document the appropriate responsibilities, approvals, and financing, for future improvements.

As discussed in the DEIR in Section 4.6.7.1, *Baseline Plus Project Intersection Operations*, since the City cannot legally implement mitigation measures outside of its jurisdiction, the County of Marin would be responsible for implementing improvements, of which Kaiser Permanente would pay its fair share. Although the fair-share contribution from Kaiser is considered mitigation, since the intersection is not part of a traffic fee program and intersection improvements have yet to be identified, the impact cannot be reduced to less than significant. As such, a Statement of Overriding Consideration would be required to certify the EIR and approve the Project.

Comment 2-3: *During the morning peak hour when the US 101 freeway is congested, Miller Creek Road and Las Gallinas Avenue are often used to bypass freeway traffic. This will be an attractive alternative for some employees and others going to the Kaiser facility. The Draft EIR and Fehr and Peers Traffic Impact Analysis should discuss this dynamic. It is noted that a large percentage of employees from the San Rafael Medical Center are anticipated to relocate to the proposed Las Gamos facility. A number of these would likely be using the Miller Creek Road/Las Gallinas bypass already and should be estimated and documented as part of the discussion/assessment.*

Response to Comment 2-3:

The FTIA did account for vehicles using Miller Creek as a means to cut through neighborhoods to avoid freeway congestion, as shown in the trip distribution assumptions included in Section 4.6.4.4 *Project Trip Distribution & Assignment* beginning on page 4.6-29 and in Figure 4.6-8 on page 4.6-31 (Figure 3-1 of the Fehr & Peers FTIA).

Comment 2-4: *Page 3-18 Pedestrian and Bicycle Access says "The project will include reusing existing pedestrian walkways throughout the Project site to provide continued connections between the parking structure and the new MOB." The pedestrian crossing at the intersection of Los Gamos Drive and Lucas Valley Road is not ADA compliant. An ADA compliant pedestrian path of travel should be provided at the Los Gamos Drive intersection.*

Response to Comment 2-4:

The comment has been noted. Mitigation measure MM TRAF-4 on page 4.6-50 of the DEIR (represented in Figure 4.6-13 on page 4.6-52) describes the necessary improvements to reduce the overall traffic impact of the Project. Part of the design would be the reconfiguration of vehicle lanes and the corresponding crosswalks, sidewalks, curbs and ramps. The design, review and approval of this improvement would include coordination and review by the County of Marin.

Comment 2-5: *An encroachment permit from Marin County would be required for any work within the County road right of way at the Las Gamos Drive/Lucas Valley Road intersection.*

Response to Comment 2-5:

The comment has been noted. As discussed in the DEIR, an MOU would be required for Project-related improvements associated with the Los Gamos Drive / Lucas Valley Road intersection. This would include coordination and review by the County of Marin for all proposed improvements, including obtaining an encroachment permit.

Comment 2-6: *All project related striping, signage, and/or improvements on Lucas Valley Road in the County road right of way shall be subject to review by the County of Marin.*

Response to Comment 2-6:

The comment has been noted. As discussed in the DEIR, an MOU would be required for Project-related improvements associated with the Los Gamos Drive / Lucas Valley Road intersection. This would include coordination and review by the County of Marin for all proposed improvements.

Comment 2-7: *The project design should include features to facilitate pedestrian crossing from the proposed parking structure across Las Gamos Drive to the new medical building.*

Response to Comment 2-7:

The comment has been noted. As noted on Page 4.6-44 in the DEIR, Kaiser is proposing to upgrade the existing crosswalk with ADA accessible ramps, high visibility markings and bulb-outs, and a pedestrian-activated crossing beacon. These project design features would facilitate pedestrian crossing and movement.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

April 24, 2018

RECEIVED

APR 30 2018

PLANNING

Sean Kennings
City of San Rafael
P.O. Box 15160
1400 Fifth Avenue
San Rafael, CA 94915-1560

Subject: Kaiser Permanente: 1650 Los Gamos Drive Medical Office Building
SCH#: 2017062019

Dear Sean Kennings:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 23, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

3-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017062019
Project Title Kaiser Permanente: 1650 Los Gamos Drive Medical Office Building
Lead Agency San Rafael, City of

Type EIR Draft EIR

Description Kaiser Permanente is proposing a project with three components: 1) The addition of medical office as an allowable use in the planned development zoning district for an existing, approx 148,000 gsf office building located at 1650 Los Gamos Dr in San Rafael, to be utilized as a medical office building; 2) The construction of an up to 476-space, three level plus upper ramp, parking structure on the existing surface parking lot located to the west of 1650 Los Gamos Dr that will primarily serve Kaiser Permanente employees working at the MOB, 3) Continued use of the existing 42 parking spaces located adjacent to 1650 Los Gamos Dr, on the 1600 Los Gamos Dr property. Kaiser Permanente has legal access to the use of those parking spaces through an easement and is not proposing any changes to the parking spaces.

Lead Agency Contact

Name Sean Kennings
Agency City of San Rafael
Phone 415-533-2111 **Fax**
email
Address P.O. Box 15160
 1400 Fifth Avenue
City San Rafael **State** CA **Zip** 94915-1560

Project Location

County Marin
City San Rafael
Region
Lat / Long 38° 01' 16" N / 122° 32' 29" W
Cross Streets Los Gamos Drive and Lucas Valley Road
Parcel No. 165-220-12, 165-220-13
Township 2N **Range** 6W **Section** 4 **Base** MD

Proximity to:

Highways US 101
Airports North San Rafael Airport
Railways SMART
Waterways Las Galinas Creek
Schools Miller Creek MS
Land Use General Office / PD 1590 / Office 15-32 units/acre

Project Issues Aesthetic/Visual; Air Quality; Noise; Traffic/Circulation; Other Issues; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Regional Water Quality Control Board, Region 2; Caltrans, District 4; Native American Heritage Commission; Public Utilities Commission

Date Received 03/09/2018 **Start of Review** 03/09/2018 **End of Review** 04/23/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter 3 Response – California State Clearinghouse

Comment 3-1: *The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 23, 2018, and the comments from the responding agency(ies) is(are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.*

Response to Comment 3-1:

This letter acknowledges the Project's compliance with the State Clearinghouse review requirements for draft environmental documents, pursuant CEQA. At the time the State Clearinghouse sent its letter to the City, it had only received one response from a reviewing agency: an initial letter (and a follow up supplemental letter) from the California State Department of Transportation (Caltrans), District 4.

RE: Kaiser EIR

4

Michael Brook <[REDACTED]>

Thu 4/19/2018 8:59 PM

To: Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>; planning <planning@cityofsanrafael.org>;

cc: Monica Rosenberg <[REDACTED]>

Hello

We would like to comment on the Draft EIR submitted by Kaiser regarding the proposed project at 1650 Los Gamos Drive.

Our main concern regarding this project is the severe negative effect it will have on the local traffic patterns. We do not think that the EIR sufficiently addresses the issues for a number of reasons. We have outline these below with the sections quoted.

- The basic assumption is flawed. The building has not been at 100% occupancy for more than a decade. At the maximum it was 40% occupied. In that decade, overall traffic has increased significantly, even though the building is essentially empty and not contributing to traffic at all. Therefore the EIR significantly underestimates the actual impact on traffic in all areas by establishing a baseline that is artificially high — 4.6.3.3 4-1
- The argument that the "Great Recession" caused the low occupancy is also flawed, because the building, as stated in the EIR, was last fully occupied in 2006, at least 18 months prior to the beginning of the recession. In addition, there has been little occupancy with the recovery, so to assume 100% occupancy is not valid — 4.6.3.3 4-2
- The peak times listed also underestimate the traffic impact. Peak times are listed at only 745-845. However, the proposal is for the facility to open at 730, therefore, the increased Kaiser traffic will likely start at 7. At the same time, the peak 101 Southbound traffic peaks at 7, so this combines the problems. — 4.6.3.5 4-3
- Similarly traffic in the evening peaks well past 6 to nearly 7pm, yet it is estimated at 5-6 pm. — 4.6.3.5
- All of the TDM plans proposed are voluntary and the proposal says it will be adjusted to "accommodate employee needs." We think that the proposal should also take into account the community needs, since the community, not the employees, will feel the majority of the negative impact of this proposal — 4.6.4.2 4-4
- In the community meetings Kaiser told the community that this was simply a "shifting" of personnel from the Terra Linda Campus. However, the EIR *** states that new employees are being hired for the site. This raises questions about all of the community involvement Kaiser has promised since they are not forthcoming. 4-5
- They report VMT for employees, but there is no assessment of the change in VMT for the patients, who are likely to make up the majority of the VMT and the traffic congestion in the proposal — 4.6.5. 4-6
- The report completely ignores the impact of traffic changes on the 101 N exit to LV/SR road using a technicality that they are "exempt because delays are related to regional traffic, but not impacted by local measures." However, the analysis states clearly that the "local measure" will significantly impact the traffic in this area. — 4.6.3.1 4-7
- LV/Los Gamos - What does Kaiser consider "their fair share" to improving this intersection, since they are the SOLE cause of this change? This should be addressed. 4-8
- The report does not take the anticipated human responses into account in the EIR. For example, the EIR acknowledges that the off-ramps to Lucas Valley Road from 101N and 101S will be significantly impacted. It is therefore likely that a significant number of employees/patients will shift their travel patterns and take either Freitas or Miller Creek exit, causing further congestion along Las Gallinas Ave. This will be particularly problematic in the AM, when 4-9

Las Gallinas is already congested due to Miller Creek Middle School traffic.

• The plan proposes the main traffic mitigation as a signal light at Lucas Valley Road/Los Gamos. This clearly will help the traffic entering and leaving Los Gamos, but will additionally adversely affect traffic traveling along Lucas Valley Road. This single will place 3 separate signal lights with along Lucas Valley in a distance of only 2500 ft. It is very likely that these lights will cause severe traffic delays. The two lights already along LVR frequently interfere in a way that backs traffic along LVR. Adding a third light will not mitigate this traffic, it will exacerbate it. The lights ONLY purpose it to convenience Kaiser employees at the expense of community traffic. — 4.6.6.1

4-10

• In the overview, the proposal states that there are 5 "significant and unavoidable impacts" on traffic. We refuse to believe these are unavoidable and believe that Kaiser should do more to mitigate this adverse effect than simply to place a traffic light — 6.1

4-11

As noted in the SF Chronicle Editorial on Transportation "In most Bay Area communities, local governments have asked developers to pay fees to offset the increased traffic impacts of the new housing they build." We think Kaiser should be held to the same standard as developers and be required to pay for the necessary improvements to ensure that the significant increase traffic that would result from the project does not further deteriorate the traffic, and therefore the quality of life for area residents, solely for the convenience of Kaiser employees and staff.

4-12

In summary, we do not believe that the current EIR correctly estimates the impact on traffic from the proposal, nor offers adequate or acceptable mitigation proposals and therefore it should be rejected until these are addressed.

Michael Brook
Monica Rosenberg
446 Cedar Hill Dr.
San Rafael, CA

Letter 4 Response – Michael Brook

Comment 4-1: *The basic assumption is flawed. The building has not been at 100% occupancy for more than a decade. At the maximum it was 40% occupied. In that decade, overall traffic has increased significantly, even though the building is essentially empty and not contributing to traffic at all. Therefore, the EIR significantly underestimates the actual impact on traffic in all areas by establishing a baseline that is artificially high.*

Response to Comment 4-1:

The Fehr & Peers *FTIA* evaluated the Project's impact on the circulation network utilizing three scenarios: Existing, Baseline, and Cumulative. The Existing conditions scenario analyzes the current conditions based on the existing building's occupancy rates.

As discussed in more detail in Master Response #4 above, the existing building has historically been 100% occupied with general office uses. The current low occupancy rate at the Project site does not reflect the historical use of the site as a functioning general office building. Recent case law confirms that agencies may exercise discretion in choosing a historical baseline when a temporary lull or spike in operations occurs over time, particularly for buildings that experience fluctuating occupancy due to the nature of the use.

Notwithstanding the above, Fehr & Peers conducted some additional analysis for informational purposes that assumed the existing occupancy under Baseline and Cumulative conditions. The results of this analysis found that Baseline with Existing Occupancy and Cumulative with Existing Occupancy operate similar to the Baseline and Cumulative conditions, and, therefore, the conclusions from the DEIR would not likely change with these assumptions.

Comment 4-2: *The argument that the "Great Recession" caused the low occupancy is also flawed, because the building as stated in the EIR, was last fully occupied in 2006, at least 18 months prior to the beginning of the recession. In addition, there has been little occupancy with the recovery, so to assume 100% occupancy is not valid.*

Response to Comment 4-2:

Please see the Response to Comment 4-1 above. Please also see Master Response #4.

Comment 4-3: *The peak times listed also underestimate the traffic impact. Peak times are listed at only 7:45-8:45. However, the proposal is for the facility to open at 730, therefore, the increased Kaiser traffic will likely start at 7. At the same time, the peak 101 Southbound traffic peaks at 7, so this combines the problems. Similarly, traffic in the evening peaks well past 6 to nearly 7 pm, yet it is estimated at 5-6 pm.*

Response to Comment 4-3:

Please see Master Response #5. The evaluation of peak-hour time periods is established by using industry standards.

Comment 4-4: *All of the TDM plans proposed are voluntary and the proposal says it will be adjusted to "accommodate employee needs." We think that the proposal should also take into account the community needs, since the community, not the employees, will feel the majority of the negative impact of this proposal - 4.6.4.2*

Response to Comment 4-4:

Kaiser has included a TDM Program as part of the Project Description; it is not a voluntary program but in fact a specific component of the Project. Furthermore, as detailed in the impact discussion for Impact TRAF-2 (on page 4.6-24), the plan components of the TDM are intended to reduce Kaiser's single occupancy vehicle trips which in turn should reduce the impact on local freeway segments. As such, the TDM is anticipated to reduce the overall impact of employee trips to and from the Project site.

The goal of a TDM program is to reduce the impact of new development on the overall transportation network. Although incorporating community needs and goals into a TDM program would be a worthy endeavor, there is no nexus or legal requirement that would necessitate such an exercise. However, as far as community needs are concerned, Kaiser has identified several design solutions in its TDM Program aimed at improving the local bicycle/pedestrian circulation network, including improving and upgrading existing sidewalks and extending bicycle lanes to connect with existing lanes.

Comment 4-5: *In the community meetings Kaiser told the community that this was simply a "shifting" of personnel from the Terra Linda Campus. However, the EIR states that new employees are being hired for the site. This raises questions about all of the community involvement Kaiser has promised since they are not forthcoming.*

Response to Comment 4-5:

As described on page 2-2 in Chapter 2, *Summary*, the Project would include approximately 315 employees at full build out. The vast majority of these employees, 245 (or 77%), would be employees relocated from other Kaiser Permanente medical offices within Marin County. Of those 245 employees, approximately 170 would be relocated from the main medical campus at 99 Montecillo Road in Terra Linda. The remaining 70 employees (23%) are expected to be new employees. Kaiser has stated that the purpose of relocating employees from the main hospital campus is to "modernize" existing spaces to meet the current needs of Kaiser doctors and patients for hospital uses (as opposed to doctor offices). Kaiser has stated that it does not intend to "backfill" these relocated spaces with new employees at this time.

Comment 4-6: *They report VMT for employees, but there is no assessment of the change in VMT for the patients, who are likely to make up the majority of the VMT and the traffic congestion in the proposal - 4.6.5.*

Response to Comment 4-6:

Fehr & Peers used employee VMT in the *FTIA* because this is the approach recommended (i.e., developing VMT per employees for employment uses) by the Governor's Office of Planning and Research (OPR) in their draft guidance for developing VMT forecasts for CEQA analysis.

Comment 4-7: *The report completely ignores the impact of traffic changes on the 101 N exit to LV/SR road using a technicality that they are "exempt because delays are related to regional traffic, but not impacted by local measures." However, the analysis states clearly that the "local measure" will significantly impact the traffic in this area. - 4.6.3.1*

Response to Comment 4-7:

The Fehr & Peers *FTIA* and the DEIR did evaluate impacts to US 101 and the on and off ramps in Section 4.6.3.3, *Approach to Analysis*, on page 4.6-18. However, as discussed in the DEIR on page 4.6-38, the *San Rafael General Plan 2020*, Policy C-5 (C) provides exemptions to LOS standards specific to freeway interchanges "Signalized intersections at Highway 101 and Interstate 580 onramps and offramps are exempt from LOS standards because delay at these locations is affected by regional traffic and not significantly impacted by local measures". Therefore, the Project's contribution to the Lucas Valley Road/Smith Ranch Road/US 101 intersection is not required to be included in a significance threshold. Nonetheless, although the US 101 interchanges are exempt based on the *San Rafael General Plan 2020*, potential improvements were identified in the *FTIA* for informational purposes.

Comment 4-8: *LV/Los Gamos - What does Kaiser consider "their fair share" to improving this intersection, since they are the SOLE cause of this change? This should be addressed.*

Response to Comment 4-8:

Although Kaiser will be adding 125 and 312 new AM and PM peak hour trips, respectively, to the Los Gamos Drive / Lucas Valley Road intersection, vehicles accessing areas within County jurisdiction will continue to travel east and west along Lucas Valley Road. Similarly, vehicles will continue to travel along Los Gamos Drive to access 1600 Los Gamos Drive south of the Project, as well as the YMCA further south. As such, the City of San Rafael and the County of Marin DPW will coordinate a fair-share contribution and MOU to understand the appropriate level of contribution for construction of the identified improvements. Please also see Master Response #1 for further discussion regarding fair-share.

Comment 4-9: *The report does not take the anticipated human responses into account in the EIR. For example, the EIR acknowledges that the off-ramps to Lucas Valley Road from 101N and 101S will be significantly impacted. It is therefore likely that a significant number of employees/patients will shift their travel patterns and take either Freitas or Miller Creek exit, causing further congestion along Las Gallinas Ave. This will be particularly problematic in the AM, when Las Gallinas is already congested due to Miller Creek Middle School traffic.*

Response to Comment 4-9:

The commenter is suggesting that due to increases in traffic trips to and from the Project site, employees and patients will shift their travel patterns from the freeway to alternate exits near the Project site and utilize nearby surface streets to access the site. As part of the *FTIA* prepared by Fehr & Peers, the local intersection network was evaluated for all potential trips based on available data and models utilized for the Project. The trip distribution uses the best available data to understand how project traffic is distributed to the study intersections. The analysis does assume some traffic originates or is destined on the west side of Lucas Valley Road (i.e., Las Gallinas). As

such, the Fehr & Peers *FTIA* determined that there would be an increase at the Las Gallinas / Lucas Valley Road intersection in the Baseline and Cumulative scenarios; the *FITA* did in fact take such diversion effects into account. As detailed in Chapter 4.6, *Transportation and Circulation*, the DEIR has identified potential impacts and mitigation measures to reduce delay at intersections nearby the Project Site. Mitigation measure MM TRAF-2 specifically addresses requiring comprehensive TDM measures to reduce single occupancy employee vehicle trips, thereby reducing the Project's impact on the regional network. However, as determined in the DEIR, Impact TRAF-3 cannot be reduced to a less than significant level without coordination and implementation from the County of Marin to improve the intersection at Las Gallinas Avenue and Lucas Valley Road.

Comment 4-10: *The plan proposes the main traffic mitigation as a signal light at Lucas Valley Road/Los Gamos. This clearly will help the traffic entering and leaving Los Gamos, but will additionally adversely affect traffic traveling along Lucas Valley Road. This single will place 3 separate signal lights with along Lucas Valley in a distance of only 2500 ft. It is very likely that these lights will cause severe traffic delays. The two lights already along LVR frequently interfere in a way that backs traffic along LVR. Adding a third light will not mitigate this traffic, it will exacerbate it. The lights ONLY purpose it to convenience Kaiser employees at the expense of community traffic. - 4.6.6.1*

Response to Comment 4-10:

The Los Gamos Drive / Lucas Valley Road intersection would operate at LOS D conditions under the Existing plus Project scenario with the installation of a traffic signal. This is an acceptable operating condition for an intersection based on the *San Rafael General Plan 2020*. Eastbound and westbound motorists on Lucas Valley Road would experience added delays as they currently never stop with the existing side-street stop control but would have to stop when the traffic signal provides green time to northbound movements on Los Gamos Drive and the westbound left turn movement from Lucas Valley Road onto southbound Los Gamos Drive. The most substantial increase in delays would occur to eastbound through traffic, as westbound traffic would only be stopped when the Los Gamos Drive approach receives a green indication. As part of the intersection improvements, any development of a new traffic signal would be coordinated with other traffic signals in the Project vicinity. Signal timing would be optimized to result in the lowest delays for each intersection movement. The City of San Rafael would coordinate planning and permitting efforts with Marin County and Caltrans. Furthermore, the intent of an MOU with Marin County, Caltrans and the City of San Rafael is to create a management and maintenance agreement for the ongoing operation of the intersection improvement.

Comment 4-11: *In the overview, the proposal states that there are 5 "significant and unavoidable impacts" on traffic. We refuse to believe these are unavoidable and believe that Kaiser should do more to mitigate this adverse effect than simply to place a traffic light - 6.1*

Response to Comment 4-11:

Please see Master Response #2.

Comment 4-12: *As noted in the SF Chronicle Editorial on Transportation "In most Bay Area communities, local governments have asked developers to pay fees to offset the*

increased traffic impacts of the new housing they build." We think Kaiser should be held to the same standard as developers and be required to pay for the necessary improvements to ensure that the significant increase traffic that would result from the project does not further deteriorate the traffic, and therefore the quality of life for area residents, solely for the convenience of Kaiser employees and staff.

Response to Comment 4-12:

All new development projects in the City of San Rafael are required to pay a Development Impact Fee for traffic mitigation. The City of San Rafael calculates the fee based on new AM and PM peak hour trips – or in this case, 437 new trips. The fee for this Project is \$1,855,502 (437 peak hour trips x \$4,246). This impact fee helps pay for Citywide improvement projects identified in the *General Plan 2020*. Please also see Master Response #1.

FW: Proposed Construction of A Kaiser Parking Lot on Lucas Valley. (DEIR SCH 2017062019-KAISER)

5

Sean Kennings <sean@lakassociates.com>

Mon 4/23/2018 3:15 PM

Re: Anne Derrick <Anne.Derrick@cityofsanrafael.org>; Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>;

Please forward to PC. Thanks

From: Michael Sharp <[REDACTED]>
Sent: Monday, April 23, 2018 3:02 PM
To: sean@lakassociates.com
Cc: marnie@cagreens.org; DConnolly@marincounty.org; ksears@marincounty.org; [REDACTED]; info@transdef.org; rhalstead@marinj.com
Subject: Proposed Construction of A Kaiser Parking Lot on Lucas Valley. (DEIR SCH 2017062019-KAISER)

Dear Sean,

I have done my best to read and understand the Draft Environmental Impact Report (DEIR) for the parking lot planned for construction on the hillside opposite 1650 Los Gamos. Without getting into the technical details of the environmental study and debating how it is possible to state that there will be little or no decrease in the air quality without proper measuring devices being installed before the project starts during project and after the project concludes, I would rather focus on the tangible facts.

1) This project will have a significant environmental impact on the ecosystem of the area where the proposed multi-story parking lot is planned. The structure will require the removal of several mature trees. Many of these trees are nesting sites for birds. 5-1

2) This project is in direct opposition to the work being done by Marin County supervisor's efforts to reduce greenhouse gases (GHG's). This project will encourage more car use at time when we need to reduce the number of trips people are making in their cars. Kate Sears was quoted in Sunday's Marin IJ dated April 22nd 2018 saying the county needs to look at low carbon forms of transportation. David Schonbrunn who is president of the Transportation solutions defense fund was also quoted in the article in Marin IJ on April 22nd saying, "The County's blind spot is motor vehicles, ever increasing amounts of driving are resulting in more GHG's." Building a parking lot that will accommodate 511 cars is only going to make the problem worse. The carbon emissions from the construction vehicles alone will generate an increase in GHG's, not to mention the increase in traffic if the project moves forward as Kaiser members would be encouraged to use their personal cars rather than use alternative transportation. Would a fleet of electric buses not be a better use of the money being put aside by Kaiser to build a parking lot? 5-2

3) In addition to the GHG's being generated by an increase in car trips to the area per day coupled with the emissions from the large trucks during the construction. The addition of a new traffic junction will increase emissions caused by idling. Idling for over 10 seconds uses more fuel and produces more CO₂ compared to restarting your engine. The traffic back up on Lucas Valley that will be caused by the additional light will therefore increase emissions. I would recommend that traffic flow analysis be looked at to reduce the emissions that will be generated by idling at the new light as well as an increase in traffic to the area to visit the Kaiser facility. 5-3

4) The number of parking spaces required should be looked at again. There are several parking lots in close proximity to the 1650 Los Gamos building that are currently under utilized and with some partnerships and creative ways to use the space there should be enough parking spaces available to accommodate the Kaiser workers and members cars. I would also recommend that a study of the use of the Kaiser Parking Lot at Terra Linda be conducted. I have made 3 trips to the Kaiser Terra Linda garage this month and each team I have gone there has been a minimum of 75 spaces available. (I have some videos and photos that I can share.) 5-4

5) Light Pollution, the current plans appear to show an increase in the amount of lights needed to illuminate in the area. If the project moves forward we appeal for the design review board to encourage Kaiser to use technology that minimizes offsite impacts of light pollution. We would hope the project complies with "Dark Skye" recommendations at a minimum. 5-5

<http://www.darksky.org/lighting/lighting-basics/>

6) Landscaping: The project will change the view that many on neighboring streets currently enjoy. The houses at the top of Salvador Way enjoy a lovely view of green treetops. With the plans to add solar panels on the roof of the planned multi story parking structure together with the high height of the planned parking lot, that Kaiser as a good faith measure will come up with a landscape mitigation plan to protect the natural tree views we currently enjoy. 5-6

7) I would also like to fully understand how this project could be completed without a significant increase in the amount of fine particulate matter being passed into the atmosphere an impacting the health of the residents in the area. 5-7

Kind Regards
Michael

<https://www.cityofsanrafael.org/kaiser-draft-eir-1650-los-gamos/>

Letter 5 Response – Michael Sharp

Comment 5-1: *This project will have a significant environmental impact on the ecosystem of the area where the proposed multi-story parking lot is planned. The structure will require the removal of several mature trees. Many of these trees are nesting sites for birds.*

Response to Comment 5-1:

As discussed in the Biological Resources section on page 45 of the Initial Study, the Project Site contains over 300 existing trees, including native oaks and redwoods, and other landscape varieties. The majority of trees proposed for removal as part of the Project are mature landscaping/ornamental trees located within this footprint, though many of the larger trees around the perimeter of the existing parking lot would be retained by keeping project construction and grading out of the critical root zones of these trees. Approximately 63 trees are proposed to be removed and 34 new trees would be planted around the perimeter of the parking structure as replacement. As part of the Initial Study, environmental concerns specific to biology were evaluated for impact significance. Mitigation measures included in the Initial Study, including conducting a pre-construction survey, will ensure that no nesting birds will be adversely affected by tree removal.

Comment 5-2: *This project is in direct opposition to the work being done by Marin County supervisor's efforts to reduce greenhouse gases (GHG's). This project will encourage more car use at time when we need to reduce the number of trips people are making in their cars. Kate Sears was quoted in Sunday's Marin IJ dated April 22nd 2018 saying the county needs to look at low carbon forms of transportation. David Schonbrunn who is president of the Transportation solutions defense fund was also quoted in the article in Marin IJ on April 22nd saying, "The County's blind spot is motor vehicles, ever increasing amounts of driving are resulting in more GHG's." Building a parking lot that will accommodate 511 cars is only going to make the problem worse. The carbon emissions from the construction vehicles alone will generate an increase in GHG's, not to mention the increase in traffic if the project moves forward as Kaiser members would be encouraged to use their personal cars rather than use alternative transportation. Would a fleet of electric buses not be a better use of the money being put aside by Kaiser to build a parking lot?*

Response to Comment 5-2:

Please see Master Response #6

Comment 5-3: *In addition to the GHG's being generated by an increase in car trips to the area per day coupled with the emissions from the large trucks during the construction. The addition of a new traffic junction will increase emissions caused by idling. Idling for over 10 seconds uses more fuel and produces more CO2 compared to restarting your engine. The traffic back up on Lucas Valley that will be caused by the additional light will therefore increase emissions. I would recommend that traffic flow analysis be looked at to reduce the emissions that will be generated by idling at the new light as well as an increase in traffic to the area to visit the Kaiser facility.*

by idling at the new light as well as an increase in traffic to the area to visit the Kaiser facility.

Response to Comment 5-3:

DEIR Chapter 4.3, *Air Quality*, addresses the short-term and long-term impacts of the Project. The basis for that evaluation, among other things, is the *1650 Los Gamos Drive FTIA* prepared by Fehr & Peers. The air quality analysis documented in Chapter 4.3 takes into account construction activities, as well as the long-term increase in vehicle trips in and out of the Project site, which includes vehicles idling while waiting at intersections. Although there are some short-term environmental impacts related to construction activities expected, all potential impacts would be reduced to less than significant levels by implementing standard construction best management practices, such as requiring air filters and limiting the duration of idling heavy equipment. No long-term operation activities triggered a significance threshold (i.e., idling vehicles at intersections) that would warrant a mitigation measure to reduce the impact.

Comment 5-4: *The number of parking spaces required should be looked at again. There are several parking lots in close proximity to the 1650 Los Gamos building that are currently under utilized and with some partnerships and creative ways to use the space there should be enough parking spaces available to accommodate the Kaiser workers and members cars. I would also recommend that a study of the use of the Kaiser Parking Lot at Terra Linda be conducted. I have made 3 trips to the Kaiser Terra Linda garage this month and each time I have gone there has been a minimum of 75 spaces available. (I have some videos and photos that I can share.)*

Response to Comment 5-4:

Please see Master Response #3 regarding required parking spaces. Kaiser has stated that it traditionally requires a program-wide 5:1,000 gsf parking space ratio based on operational activity. Specifically, the parking surplus helps alleviate congestion during employee shift changes and reduces the potential for vehicle queuing when entering parking structures. The DEIR did not evaluate the conditions at the Kaiser Terra Linda hospital facility parking structure given that this is outside the scope of the Project and DEIR, however, the condition at the location referenced by the commenter would support Kaiser's practice of providing a parking surplus.

Comment 5-5: *Light Pollution, the current plans appear to show an increase in the amount of lights needed to illuminate in the area. If the project moves forward we appeal for the design review board to encourage Kaiser to use technology that minimizes offsite impacts of light pollution. We would hope the project complies with "Dark Skye" recommendations at a minimum.*

Response to Comment 5-5:

The DEIR evaluated public view impacts related to the construction of the parking structure and the Initial Study prepared in June 2017 evaluated impacts related to lighting. As discussed in the Initial Study, all site lighting would be required to meet the City of San Rafael minimum illumination standards for safety at all exterior doorways, parking areas and ground level

walkways. Further, specific lighting design is subject to Design Review Board review and approval and standard City conditions of approval. In addition, the Initial Study provided a mitigation measure MM AES-1 specifically requiring a photometric lighting study demonstrating California Energy Code compliant lighting, which will be included in the MMRP in Chapter 5 of this FEIR. San Rafael Municipal Code Section 14.16.227 requires lighting to comply with light and glare requirements, including avoiding light spillover to adjacent properties.

Comment 5-6: *Landscaping: The project will change the view that many on neighboring streets currently enjoy. The houses at the top of Salvador Way enjoy a lovely view of green treetops. With the plans to add solar panels on the roof of the planned multi story parking structure together with the high height of the planned parking lot, that Kaiser as a good faith measure will come up with a landscape mitigation plan to protect the natural tree views we currently enjoy.*

Response to Comment 5-6:

The retention of mature redwood and oak trees adjacent to the Project site will provide a screen element that would retain the natural condition of the wooded hillside. In addition, the Project's proposed landscape plan includes planting 34 new trees, including many native oak trees adjacent to the new parking structure.

Comment 5-7: *I would also like to fully understand how this project could be completed without a significant Increase In the amount of fine particulate matter being passed into the atmosphere an impacting the health of the residents in the area.*

Response to Comment 5-7:

The commenter is directed to Chapter 4.3 *Air Quality*, and specifically Section 4.3.1.3 beginning on page 4.3-2. Further explanation of fine particulate matter is addressed in Section 4.3.4 in Table 4.3-5 on page 4.3-14 and Table 4.3-6 on page 4.3-16. As documented in the DEIR, construction activities associated with the Project will be reduced to less than significant levels by implementation of standard construction best management practice mitigations. Ongoing operational activities will not result in long-term impacts and, as such, no further mitigation is required.

FW: Kaiser Parking Structure DEIR - SCH #2017062019

Sean Kennings <sean@lakassociates.com>

Mon 4/23/2018 7:40 PM

cc: Anne Derrick <Anne.Derrick@cityofsanrafael.org>; Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>;

-----Original Message-----

From: Margaret Kathrein <[REDACTED]>
Sent: Monday, April 23, 2018 6:44 PM
To: sean@lakassociates.com
Subject: Kaiser Parking Structure DEIR - SCH #2017062019

Dear Planning Commissioners,
I am writing as a resident of Lucas Valley.

With respect to the project:

First, the notice does not describe the project correctly, therefore, causing residents to misunderstand the project and its impacts.

6-1

I pass thru the intersection of Los Gamos and LV Road every day in my car or on my bike, and I always admire the natural beauty of the trees and the setting.

I am a member of the YMCA and frequently turn at the corner to the Y, passing the proposed site.

CEQA makes environmental impacts a mandatory part of this agency's review process.

I moved to Lucas Valley 30 years ago because of the pastoral and rural setting. The proposed parking structure will impact our tranquil environment, bringing additional light pollution, intrusive traffic, and noise.

6-2

These environmental impacts will affect our environment and the quality of life of all residents. The wildlife will also be impacted - I have seen wild turkeys roaming there. I understand there are Great Horned Owls nesting in this area, and I hear the owls at night. Views of residents from homes, walking paths in this area, and from our cars, will be disrupted. A traffic light is inevitable and not in keeping with the quiet, serene environment of the valley.

6-3

6-4

6-5

6-6

The current proposed project will require an amendment to the existing PD District. Trees and environment will be impacted in major ways.

6-7

A location along the freeway would be more appropriate, close to Kaiser and the YMCA. A parking structure along the freeway would be more appropriate, less impactful, and more suitable. I urge you to reconsider the location.

6-8

Sincerely,

Margaret Kathrein
1098 Idylberry Road

San Rafael, CA 94903

Letter 6 Response – Margaret Kathrein

Comment 6-1: *First, the notice does not describe the project correctly, therefore, causing residents to misunderstand the project and its impacts.*

Response to Comment 6-1:

The notice for the April 24, 2018 Planning Commission hearing uses the appropriate address for the Project, as both the existing office building and the surrounding surface parking lots on both side of Los Gamos Drive, are listed as 1650 Los Gamos Drive. However, the description of the “western parcel” was not included in the notice. The project location section in Chapter 3: *Project Description* of the DEIR properly identified the address of the property and references the western parcel as the location for the parking structure.

Comment 6-2: *The proposed parking structure will impact our tranquil environment, bringing additional light pollution, intrusive traffic, and noise.*

Response to Comment 6-2:

As documented in the DEIR, environmental impacts related to views, air quality, GHG emissions, noise, and transportation and circulation were evaluated for significance thresholds and where appropriate, mitigation was proposed to reduce the impact.

Comment 6-3: *These environmental impacts will affect our environment and the quality of life of all residents.*

Response to Comment 6-3:

Pursuant to the *CEQA Guidelines §15002*, the basic purpose of CEQA is to inform governmental decision makers and the public about the potential significant environmental effects of proposed activities and identify ways that environmental impacts can be avoided or significantly reduced. Furthermore, in this case, the preparation of both the Initial Study and the DEIR is intended to prevent significant, avoidable damage to the environment by requiring changes in the Project through the adoption of alternatives or mitigation measures. Finally, CEQA requires that the Initial Study and DEIR disclose to the public the reasons why a governmental agency approves the project in the manner the agency chooses if significant environmental effects are involved.

Comment 6-4: *The wildlife will also be impacted - I have seen wild turkeys roaming there. I understand there are Great Horned Owls nesting in this area, and I hear the owls at night.*

Response to Comment 6-4:

Environmental issues related to biology and habitat loss were analyzed as part of the Project’s Initial Study review in 2017 and determined to be less than significant or less than significant with mitigation incorporation. The Biological Resources section in the Initial Study includes mitigation measure MM BIO-1 to protect nesting birds prior to any tree removal. Furthermore, a pre-construction survey is a requirement of the Project mitigation measures including those species subject to the Migratory Bird Treaty Act.

Comment 6-5: *Views of residents from homes, walking paths in this area, and from our cars, will be disrupted.*

Response to Comment 6-5:

As discussed in Chapter 4.2 *Aesthetics*, on page 4.2-17, the City of San Rafael does not have any policies or regulations relating to the protection of private views, nor are private views protected under CEQA. Nonetheless, for DEIR discussion purposes, the City did evaluate impacts to private views as part of the DEIR in Chapter 4.2, *Aesthetics*, including views to and through the site from areas along Salvador Way to the west and uphill from the Project beginning on page 4.2-2. In addition, a photo simulation was prepared to demonstrate what solar arrays may look like on the parking structure.

The DEIR found that the proposed Project would not block the view of the hills to the east and would not break or silhouette any of the hillside or ridgelines that are to the north or east. Additionally, the proposed parking structure materials, which are generally concrete and muted colors, would not significantly alter existing views of the natural setting that surround the parking structure and minimize the visibility of the structure. Furthermore, the building is partially subterranean and would be situated within an area of the site where existing redwood and oak trees would provide substantial screening. As a result, the impact is considered less than significant.

Comment 6-6: *A traffic light is inevitable and not in keeping with the quiet serene environment of the valley.*

Response to Comment 6-6:

Chapter 4.6, *Transportation and Circulation* in the DEIR identifies Impact TRAF-1 on page 4.6-36 as a potentially significant impact specific to the Existing plus Project scenario. Mitigation measures MM TRAF-1 identifies signalization of the Los Gamos Drive / Lucas Valley Road intersection as a means to reduce potential impacts as a result of the Project. However, although the Project contributes vehicle trips to this intersection, the traffic signal improvement has previously been identified in the *San Rafael General Plan 2020* for this intersection.

Comment 6-7: *The current proposed project will require an amendment to the existing PD District. Trees and environment will be impacted in major ways.*

Response to Comment 6-7:

While the Project would require the removal of 63 trees, many of these would be parking lot landscaping/ornamental trees. As part of the proposed Project, Kaiser is replanting 34 native trees surrounding the proposed parking structure, including valley and coast live oaks.

Comment 6-8: *A location along the freeway would be more appropriate, close to Kaiser and the YMCA. A parking structure along the freeway would be more appropriate, less impactful, and more suitable. I urge you to reconsider the location.*

Response to Comment 6-8:

Kaiser does not own the surface parking areas closest to the YMCA. However, as discussed in DEIR Chapter 5, *Alternatives*, the surface parking areas surrounding the existing 1650 Los Gamos

Drive building are smaller in footprint than the western surface parking lot, which would create a much taller parking structure as discussed in Section 5.7, *Alternative 3: Alternate Parking Structure Location* on page 5-13.

FW: kaiser parking garage

Sean Kennings <sean@lakassociates.com>

7

Mon 4/23/2018 7:40 PM

To: Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>; Anne Derrick <Anne.Derrick@cityofsanrafael.org>

-----Original Message-----

From: Chris Andersonn [REDACTED]

Sent: Monday, April 23, 2018 5:43 PM

To: sean@lakassociates.com

Subject: kaiser parking garage

Hi Sean,

I am a resident near the new Kaiser location, I live at 16 Salvador Way, just above the proposed garage.

I have real concerns about the extra traffic on the Lucas Valley exit, the wait time it will cause, and the extra emissions it will produce. This sounds awful to me and my wife. I understand others have talked about emission free transportation that could be available for people to get to Kaiser, like buses or shuttles coming in from a close by location. People could park their cars there and take the shuttles. That could be one alternative, as an example.

7-1

Anything that and alleviate the traffic would help out a lot.

Thanks for your attention.

Chris and Barbara Andersonn

16 Salvador Way, San Rafael, Ca 94903

[REDACTED]

Letter 7 Response – Chris Andersonn

Comment 7-1: *I have real concerns about the extra traffic on the Lucas Valley exit, the wait time it will cause, and the extra emissions it will produce. This sounds awful to me and my wife. I understand others have talked about emission free transportation that could be available for people to get to Kaiser, like buses or shuttles coming in from a close by location. People could park their cars there and take the shuttles. That could be one alternative, as an example.*

Anything that and alleviate the traffic would help out a lot.

Response to Comment 7-1:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. As discussed in Chapter 3, *Project Description* and 4.6, *Transportation and Circulation*, Kaiser is proposing a TDM Program as part of the Project. The intent of the TDM Program is to help reduce single occupancy vehicle trips by incentivizing alternative transportation methods, including but not limited to local shuttle to and from SMART Station and other Kaiser facilities in the City of San Rafael, pre-tax commuter spending accounts, subsidy for bicycle, transit or car/vanpool use, preferential parking for car/vanpools, onsite bicycle storage. The DEIR provides a detailed discussion on potential freeway segment impacts beginning on page 4.6-39 in the Impact TRAF-2 discussion. As shown in Table 4.6-13 on page 4.6-42, the southbound Lucas Valley Road off-ramp would not exceed the volume to capacity ratio threshold with the addition of the Project, and no mitigation would be required. Furthermore, with a successful implementation of the Kaiser's TDM Program, potential impacts to nearby freeway segments would also be reduced to less than significant levels.

FW: Poposed Kaiser Permanete Parking Structure on Los Gamos Drive

8

Sean Kennings <sean@lakassociates.com>

Mon 4/23/2018 7:41 PM

cc: Anne Derrick <Anne.Derrick@cityofsanrafael.org>; Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>;

From: stanton klose [redacted]
Sent: Sunday, April 22, 2018 4:55 PM
To: Sean Kennings <sean@lakassociates.com>
Subject: Poposed Kaiser Permanete Parking Structure on Los Gamos Drive

Greetings,

I live on Los Gamos Road and frequently walk or jog along Los Gamos Drive.

I took a quick look through the paperwork associated with the KP project. I saw a rendering of the parking structure and have two comments.

First, I would have thought it was a no brainer to shield the upper deck with solar panels, both to generate solar power and to protect cars from heat and UV. As I'm sure you know, the Sheriff's Department installed solar panels on the roof of their offices near the KP project. 8-1

Second, the conceptual design for the parking structure shows typical drab, businesslike architecture. It seems to me that a bit of color would make it less brutal, maybe some eyebrows with accent colors. 8-2

BTW, I assume there will continue to be no through traffic between Los Gamos Drive and Los Gamos Road. 8-3

Thank you for taking my comments into account.

Stanton Klose
Terra Linda

Letter 8 Response – Stanton Klose

Comment 8-1: *First, I would have thought it was a no brainer to shield the upper deck with solar panels, both to generate solar power and to protect cars from heat and UV. As I'm sure you know, the Sheriff's Department installed solar panels on the roof of their offices near the KP project.*

Response to Comment 8-1:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. Kaiser Permanente has included solar panels on the upper deck of the parking structure as part of the Project design.

Comment 8-2: *Second, the conceptual design for the parking structure shows typical drab, businesslike architecture. It seems to me that a bit of color would make it less brutal, maybe some eyebrows with accent colors.*

Response to Comment 8-2:

The parking structure will be reviewed by the San Rafael Design Review Board for consistency with the City's non-residential design standards. The Design Review Board reviewed the proposed parking structure design at a public hearing on July 17, 2018, and unanimously recommended approval to the San Rafael Planning Commission.

Comment 8-3: *I assume there will continue to be no through traffic between Los Gamos Drive and Los Gamos Road.*

Response to Comment 8-3:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. The commenter is requesting confirmation that Los Gamos Drive will not connect with Los Gamos Road to the south. There is no plan to connect Los Gamos Drive and Los Gamos Road.

FW: DEIR SCH 2017062019-KAISER

9

Mon 4/23/2018 7:41 PM

To: Anne Derrick <Anne.Derrick@cityofsanrafael.org>; Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>;

From: Cecil Nielsen <[REDACTED]>
Sent: Sunday, April 22, 2018 3:42 PM
To: Sean Kennings <sean@lakassociates.com>
Cc: Cecil Nielsen <[REDACTED]>; Michael Shar <[REDACTED]>; Richard Nielsen <[REDACTED]>
Subject: DEIR SCH 2017062019-KAISER

Sean-

As a resident at 19 Salvador Way for the past 30 years, we have enjoyed our views considerably. It is the main reason we purchased our home. When we look down and around, it is all green around us and beyond. A few years back, the county placed emergency towers up our hill and it totally ruined our views. We brought this up to the city and the city immediately had them taken down. 9-1

Not only will building a parking garage ruin our views, the construction itself will be utterly disturbing. The noises from down below and the dust will have a huge impact on our living situation and force us into our homes with windows closed. 9-2

The parcel of land that you are referring to for a parking garage in your DEIR (which is misrepresented as being at 1650 Los Gamos and not across the street), will affect our views considerably. During the day and during the night. I am attaching a photograph of our current views. 9-3

I would like to ask the board to reconsider their parking garage location and leave that parking lot as is. I don't want to be looking down at a parking garage. The existing parking lot blends well with the natural Marin landscaping surrounding it. Members are invited to come to our home and look. Please call my wife, Cecil to schedule a time: 415-505-3591. I hope Kaiser looks at alternatives for their parking situation. 9-4

Thank you for your consideration into this matter,

Sincerely,

Richard Nielsen

[REDACTED]
19 Salvador Way

San Rafael, CA 94903



Letter 9 Response – Richard Nielsen

Comment 9-1: *As a resident at 19 Salvador Way for the past 30 years, we have enjoyed our views considerably. It is the main reason we purchased our home. When we look down and around, it is all green around us and beyond. A few years back, the county placed emergency towers up our hill and it totally ruined our views. We brought this up to the city and the city immediately had them taken down.*

Response to Comment 9-1:

The comment is noted.

Comment 9-2: *The construction itself will be utterly disturbing. The noises from down below and the dust will have a huge impact on our living situation and force us into our homes with windows closed.*

Response to Comment 9-2:

The DEIR does include evaluation for impacts related to air and noise specific to “sensitive receptors” or nearby residents within a 1,000 feet of construction activities. Although the analysis in Chapters 4.3, 4.4, and 4.5 include data specific to construction of the Project, impacts from construction activities were found to be less than significant after implementation of mitigation measures MM AIR-1 and MM NOISE-1, which require implementation of best management practices during construction to reduce air and noise impacts.

Comment 9-3: *The parcel of land that you are referring to for a parking garage in your DEIR (which is misrepresented as being at 1650 Los Gamos and not across the street) will affect our views considerably. During the day and during the night.*

Response to Comment 9-3

Private views are considered those from individual private residences. As discussed in DEIR Chapter 4.2, *Aesthetics* (and the response to comment 6-5 above), private views are not subject to review under CEQA. Nevertheless, the DEIR did evaluate the Project’s impacts to public views (i.e., views from Salvador Way or Lucas Valley Road) and found that the Project would not block views of ridgelines, hills or other scenic resources in the Project vicinity. Although the Project would entail the construction of a parking structure, thus introducing a new physical development, the Project site already contains lighting for the existing surface parking lot. The new parking structure would include lighting as well, but not a new, adverse source of lighting considered a significant impact. Finally, the Initial Study includes mitigation measure MM AES-1 that require lighting to be night-sky compliant and downward facing.

Comment 9-4: *I would like to ask the board to reconsider their parking garage location and leave that parking lot as is. I don't want to be looking down at a parking garage. The existing parking lot blends well with the natural Marin landscaping surrounding it. Members are invited to come to our home and look.*

Response to Comment 9-4:

The comment is noted. However, as discussed in Chapter 5, *Alternatives*, the surface parking areas surrounding the existing 1650 Los Gamos Drive building are smaller in footprint than the western

surface parking lot, which would create a much taller parking structure as discussed in the DEIR on page 5-13, in Section 5.7, Alternative 3: Alternate Parking Structure Location.



10
City of San Rafael
Conversation with John Rojas

Associated Constituent

John Rojas

C-1017870, added on July 25th, 2016 at 10:29 AM

Phone Numbers: +1(415) [REDACTED]
+1(415) [REDACTED]

Email Addresses: [REDACTED]

Locations: 435 Cedar Hill Dr, San Rafael CA 94903-1703

Conversation:

First Name: John
Last Name: Rojas
Email Address: jhrojas435@comcast.net
Phone Number: 4153061302
Subject: Planning Commission Meeting Tomorrow

Message: Hi, My name is John Rojas. I am President of the Mont Marin/San Rafael Park Neighborhood Association. I would like to submit a comment for consideration on the Planning of the Kaiser move to Los Gamos Dr. There needs to be a "NO RIGHT TURN ON RED" at the proposed stop light on Los Gamos and Lucas Valley Rd. There have been many close calls at this intersection with drivers coming from the YMCA and other offices on Los Gamos. Please design this intersection carefully taking pedestrians and bicycle traffic as well as autos under consideration. Thank you. John H. Rojas President, MMSRPNA

10-1



A: LOCATION
435 Cedar Hill Dr
San Rafael CA 94903-1703

Inbound form submission from John Rojas to Contact us on April 23rd, 2018 at 11:23 AM

Thank you for your message. We value your input and strive to respond to any questions or concerns within 2 business days. Thank you, City of San Rafael

Automated message sent to John Rojas via City Manager's Office on April 23rd, 2018 at 11:23 AM

Letter 10 Response – John Rojas

Comment 10-1: *There needs to be a "NO RIGHT TURN ON RED" at the proposed stop light on Los Gamos and Lucas Valley Rd. There have been many close calls at this intersection with drivers coming from the YMCA and other offices on Los Gamos. Please design this intersection carefully taking pedestrians and bicycle traffic as well as autos under consideration.*

Response to Comment 10-1:

The commenter is requesting a “no right turn on red” restriction for the potential improvement at the Los Gamos Drive and Lucas Valley Road intersection. The ultimate design, implementation, and management of the traffic signal and intersection of Los Gamos Drive and Lucas Valley Road will be a coordinated effort between the City of San Rafael, Marin County, and Caltrans. The ultimate operation of the signal, and whether or not a vehicle is allowed to turn right at a red-light, will be evaluated as part of the design and permitting process.

4/22/2018

Mail - Raffi.Boloyan@cityofsanrafael.org

Re: DEIR SCH 2017062019-KAISER

Raffi Boloyan

Sun 4/22/2018 6:28 AM

To: Raffi Boloyan <Raffi.Boloyan@cityofsanrafael.org>

11

----- Forwarded message -----

From: Cecil Nielsen [REDACTED]
Date: Fri, Mar 30, 2018 at 5:45 PM
Subject: DEIR SCH 2017062019-KAISER
To: Sean Kennings <sean@lakassociates.com>
Cc: Michael Sharp <[REDACTED]>, TOM <[REDACTED]>

Sean-

I may not be able to attend your meeting for April 24, since my daughter is expecting right around that time. So I wanted to forward my address to the Planning Commission. Thank you.

Planning Commission Members:

First I would like to point out that the notice that was sent DOES NOT describe the project correctly, therefore, causing residents to misunderstand Kaiser's intentions.

It states: Project: 1650 Los Gamos Drive (Kaiser Medical Office Building and New Garage)- Request for an Design Review, Use Permit and Planned Development District Amendment approval of the conversion of an existing three-story 148,000 sq ft office building to medical office uses and the construction of a 37-foot tall, 3 level, 476 stall parking structure at 1650 Los Games Drive in North San Rafael."

Neighbors receiving this notice are not being told that the new car garage will be across the street of 1650 Los Gamos Drive, which is a completely different address. This needs to be corrected. I mentioned this at the meeting last time and I don't think they heard me. People reading the notice will think that the new parking garage will be located at 1650 Los Gamos Drive. Many of the residents will not comprehend that the proposal is for the lot across the street (west side).

11-1

Second, I would also like to point out that we have 2 sets of owls in the neighborhood that are nesting in that vicinity. Tree removal in the proposed location is unnecessary and will harm the raptors and other avian species. The removal of established trees is not environmentally friendly for humans or animals. These animals are here year long and we want them to stay. They are sensitive to the habitat.

11-2

The construction will have a major impact on the steel head trout and water shed. This area is a cultural site and needs to be protected. It is a tributary and there may be sacred objects in this area. This area used to be where indians settled. This was an area they chose to live because it was protected from the harsh winds, provided food and had drinking water and foliage to protect them. The indians that resided here were the Miwoks. I have spoken with the Sierra Club of Marin and they are not in support of this project.

11-3

https://outlook.office365.com/owa/?realm=cityofsanrafael.org

1/3

4/22/2018

Mail - Raffi.Boloyan@cityofsanrafael.org

Note that employees that will be parking in the garage will most likely be using the YMCA either before or after work. Having a parking garage in the middle of the YMCA and 1650 Los Gamos, alongside the freeway is the best bet and makes more sense. It would help as a sound barrier, be central, easy access, can use solar panels, a running track could be placed atop, etc. and it would protect the ecologically sensitive area that is across the street from 1650 Los Gamos. If parking is placed alongside the freeway corridor, employees can park there, go to the YMCA and then go to work. Perhaps YMCA employees could use parking garage as well maybe. It is imperative that the County be involved in this process. This project will have a huge impact on traffic and smog emissions. 11-4
11-5
11-6

I would like the property across from 1650 Los Gamos to remain as is, in it's "Samuel P. Taylor" state. Perhaps adding some picnic tables, parcour improvements, etc. An overpass so people can cross/walk or bike safely would be a sensitive and friendly idea. I would like the City of San Rafael to preserve the beautiful nature we have tucked in that **sacred** spot. Please see pics below. 11-7

Lastly, I would like to see the City of San Rafael be more **innovative in their concept of parking garages, which will become obsolete in the near future**. Then what!?! 11-8

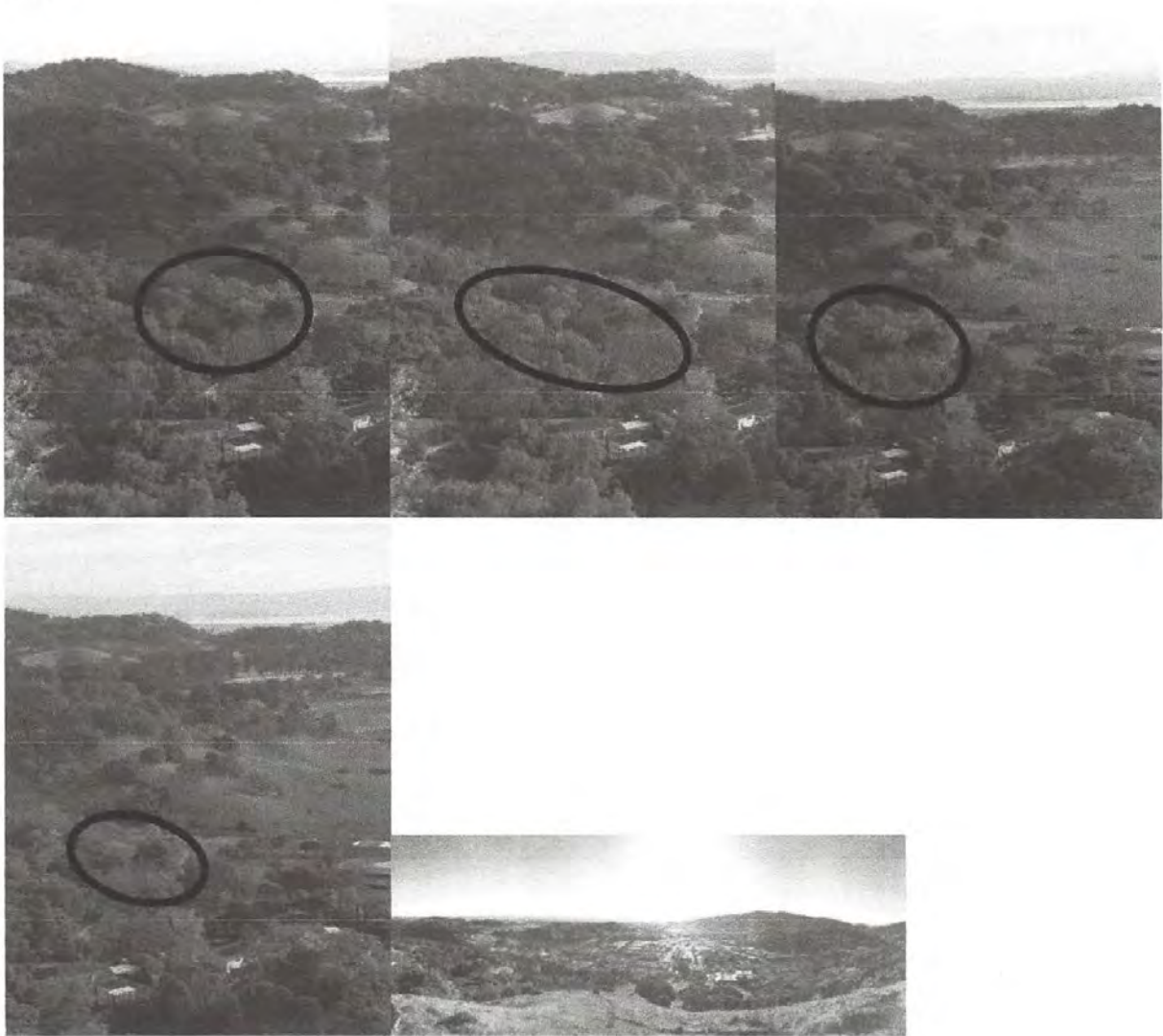
I am enclosing photographs taken from atop, so you can see what a beautiful dense "forest" type area this is and how taking it away is a step in the wrong direction. **City of San Rafael needs to be sustainable** in it's actions here. I again suggest that the parking lot be **built alongside the freeway**. Talks between the County, YMCA, Kaiser and the City of San Rafael need to be done right away to address this. It's a win win for all. 11-9

Let this project be an example for other projects to come. Community and love of the land. It's our future.

Cecil Nielsen

4/22/2018

Mail - Raffi.Boloyan@cityofsanrafael.org



<https://outlook.office365.com/owa/?realm=cityofsanrafael.org>

3/3

Letter 11 Response – Cecil Nielsen

Comment 11-1: *Neighbors receiving this notice are not being told that the new car garage will be across the street of 1650 Los Gamos Drive. which is a completely different address. This needs to be corrected. I mentioned this at the meeting last time and I don't think they heard me. People reading the notice will think that the new parking garage will be located at 1650 Los Gamos Drive. Many of the residents will not comprehend that the proposal is for the lot across the street (west side).*

Response to Comment 11-1:

The notice uses the appropriate address for the Project of 1650 Los Gamos Drive, however, the description of the property's "western parcel" is not included due to space limitations. The project location section in Chapter 3: *Project Description* of the DEIR properly references the western parcel as the location for the parking structure.

Comment 11-2: *I would also like to point out that we have 2 sets of owls in the neighborhood that are nesting in that vicinity. Tree removal in the proposed location is unnecessary and will harm the raptors and other avian species. The removal of established trees is not environmentally friendly for humans or animals. These animals are here year long and we want them to stay. They are sensitive to the habitat.*

The construction will have a major impact on the steel head trout and water shed.

Response to Comment 11-2:

The Biological Resources section in the 2017 Initial Study evaluated potential Project impacts related to tree removal and development adjacent to the nearby intermittent creek near the northern boundary of the Project site. The biological assessment prepared by GANDA for the Initial Study did not find occurrences of owls or steelhead in the Project vicinity and concluded that impacts would be less than significant with no mitigation required. Furthermore, the Initial Study concluded that the Project construction activities would be well outside the required 25-foot creek setback requirement in the *San Rafael General Plan 2020*. Finally, the Initial Study includes a biological impact mitigation measure that requires a pre-construction bird and bat survey to ensure no nesting birds are impacted due to tree removal. This mitigation measure MM BIO-1 is included as part of MMRP in Chapter 5 of the Response to Comments document.

Comment 11-3: *This area is a cultural site and needs to be protected. It is a tributary and there may be sacred objects in this area. This area used to be where indians settled. This was an area they chose to live because it was protected from the harsh winds, provided food and had drinking water and foliage to protect them. The indians that resided here were the Miwoks. I have spoken with the Sierra Club of Marin and they are not in support of this project.*

Response to Comment 11-3:

Although not a specific comment on the DEIR, the Project's Initial Study prepared in 2017 evaluated potential impacts related to cultural and archaeological resources. The cultural resource

assessment prepared by GANDA concluded that there are no potential cultural resources located in or adjacent to the Project site. Furthermore, the Initial Study includes a mitigation measure that requires Project protection of archaeological or human remains if found during construction. These mitigation measures are included as part of MMRP in Chapter 5 of the FEIR.

Comment 11-4: *Having a parking garage in the middle of the YMCA and 1650 Los Gamos, alongside the freeway is the best bet and makes more sense. It would help as a sound barrier, be central, easy access, can use solar panels, a running track could be placed atop, etc. and it would protect the ecologically sensitive area that is across the street from 1650 Los Gamos.*

Response to Comment 11-4:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. Kaiser has had conversations with the County of Marin regarding utilizing surface parking on 1600 Los Gamos property, however, Kaiser has not discussed constructing a parking structure on the County property. Furthermore, it would be highly unlikely that another property owner would allow Kaiser to construct a parking structure on their property and the City of San Rafael would not likely approve off-site parking without a comprehensive understanding and agreement of the long-term operational uses of such a project. As discussed in Chapter 5, *Alternatives*, the surface parking lot on the eastern parcel adjacent to the existing office building was identified as an alternative location for a parking structure. However, this surface parking area has a smaller footprint than the western surface parking lot, which would result in a much taller parking structure as discussed in Section 5.7, Alternative 3: Alternate Parking Structure Location on page 5-13. As the structure would need to be taller than the proposed Project, it would be visible from neighboring residential properties and dominate the view corridors along Lucas Valley Road.

Comment 11-5: *This project will have a huge impact on traffic.*

Response to Comment 11-5:

The Fehr & Peers *FTIA* and the DEIR have both provided an in-depth analysis of the existing and proposed traffic conditions, including evaluating potential environmental impacts. Where appropriate, mitigation measures have been recommended to reduce potential impacts to less than significant levels.

Comment 11-6: *This project will have a huge impact on smog emissions.*

Response to Comment 11-6:

The DEIR provided an in-depth criteria pollutant analysis in Chapter 4.3, *Air Quality*, and specifically Section 4.3.1.3 beginning on page 4.3-2. Further explanation of fine particulate matter is addressed in Section 4.3.4 in Table 4.3-5 on page 4.3-14 and Table 4.3-6 on page 4.3-16. As documented in the DEIR, construction activities associated with the Project will be reduced to less than significant levels by implementation of standard construction best management practice mitigations. Ongoing operational activities will not result in long-term impacts and, as such, no further mitigation is required.

Comment 11-7: *I would like the property across from 1650 Los Gamos to remain as is, in it's "Samuel P. Taylor" state. Perhaps adding some picnic tables, parcourse improvements, etc. An overpass so people can cross/walk or bike safely would be a sensitive and friendly idea. I would like the City of San Rafael to preserve the beautiful nature we have tucked in that sacred spot.*

Response to Comment 11-7:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

Comment 11-8: *Lastly, I would like to see the City of San Rafael be more innovative in their concept of parking garages, which will become obsolete in the near future.*

Response to Comment 11-8:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. Please also see Master Response #3 regarding parking requirements.

Comment 11-8: *I am enclosing photographs taken from atop, so you can see what a beautiful dense "forest" type area this is and how taking it away is a step in the wrong direction. City of San Rafael needs to be sustainable in it's actions here. I again suggest that the parking lot be built alongside the freeway. Talks between the County, YMCA, Kaiser and the City of San Rafael need to be done right away to address this. It's a win win for all.*

Response to Comment 11-8:

The comment is noted.

Craig K. Murray, 260 Merrydale Road #15, San Rafael, CA 94903, 415-747-4500,
 [REDACTED]

City of San Rafael, Community Development Department, Planning Manager Raffi Boloyan, 1400 Fifth Avenue, San Rafael, CA 94901, 415-485-3095, raffi.boloyan@cityofsanrafael.org

RE: Kaiser 1650 Los Gamos Drive Facility Draft Environmental Impact Report (DEIR) Review

1. Applicant Kaiser has shown to be understanding and cooperative with the incorporated North San Rafael community such as immediate past project to drop plans for a planned surface parking lot at the open space play fields across from its 99 Montecillo Road facility in exchange for a parking structure built within its real property fee-owned site. Kaiser staff was very easy to work with our Terra Linda Homeowners Association (TLHOA) at that time and location. Kaiser, through a series of review meetings, included many items in the project brought forward by the HOA such as electric vehicle parking stations. With this site to provide relief of current hospital site density, Kaiser will be bringing much needed increased tax base and perhaps a set amount of pharmacy sales and, as per statement by the Kaiser Planner, 70 new jobs to North San Rafael with this office reuse and accommodation of principally Staff vehicles in a multi-level, set back parking structure. ;
2. Suggestion to San Rafael and consultants related to project is to have a compendium of project acronyms and terms that may not be familiar to the community it is presenting to. From this particular meeting I tracked the following terms and acronyms that could have been compiled in a translational language single or few page document: LU, PD, Peak Hour Trips, CEQA, Fair Share, Traffic Impact Fees, Travel Demand Fees, PC, Sensitive Receptors, MM, BAAQMD, GHG, MOU, MOB, VMT, TDM, FTIA, DEIR, APN,
3. Class II Bike Lane and from Cal Trans Officials Patricia Maurice, District Branch Chief, Local Development, Intergovernmental review letter: "Bike Proof Grate" (presumably this is on grade in bike path of travel lane just west of the Cal Trans Lucas Valley Road/Smith Ranch Road Overcrossing structure and unclear what the proofing represents it should certainly not be bicyclists themselves. Ms. Maurice or Stephen Conteh 510-286-5534, stephen.conteh@dot.ca.gov may clarify and perhaps show how safe this is compared to these on grade drainage grates built by Cal Trans and within the bike lanes in the incorporated portion of San Rafael at the top of the Puerto Suehello hill. These have been found to be obstacles and could place children and others on bicycles in the path to quickly divert into the designated vehicle travel lanes.)
4. San Rafael, Cal Trans is asking Kaiser to mitigate by providing a Class II Bicycle lane to the freeway ramp. Thanks to the applicant, Cal Trans on taking this on and most importantly the challenge is really with the City to make this Class II bikeway along Lucas Valley/Smith Ranch Road to the County Recreational Facilities at end of Smith Ranch Road and to sign, strip and connect this accommodation to connect to the regional 9-County San Francisco Bay Trail located also at the west end of Smith Ranch Road area. (This may help prevent the lack of the safe use of these new facilities like the new signed, marked class II bike lane all of about 3-car lengths in southwest corner of new Las Gallinas Avenue/Freitas Parkway intersection improvements as designed and provided by the City).

12-1

12-2

12-3

12-4

- | | |
|---|-------|
| 5. City should encourage Kaiser to design the 476-stall garage, if it is not already, to be expandable. This may be with knock out panels and designated landscaped area for future parking structure expansion. | 12-5 |
| 6. Relocation of the Sanitary Sewer Line within the project and utility changes should be discussed and detailed upfront with associated Special District representatives. | 12-6 |
| 7. Any green standards to incorporate into the Structure that will will reduce Green House Gasses (GHGs) such as one Neighbor mentioning a generator fueled and byproduct emissions from its diesel fuel design and consider alternative fuel sources such as natural gas. | 12-7 |
| 8. Page 13 of the Staff Report speaks to County and Neighborhood groups to meet and mitigate traffic intersection improvements as necessary for the project but primarily outside the incorporated City jurisdiction. Identify and engage these groups.; | 12-8 |
| 9. Perform project fiscal analysis. Show expected contribution amounts by applicant and others besides the city. If dollar expectations could be determined, then show percentages of offsite required improvements and what each other government entity will need to contribute. Identify who will own and manage these new facilities. | 12-9 |
| 10. Have the San Rafael Bicycle and Pedestrian and Advisory Committee meet, review and provide comments on project and area necessary improvements. Ask Marin County Bicycle Coalition to also review, provide comments on project plans. | 12-10 |

Thank-you for the opportunity to present.

Craig K. Murray, SR/WA

Craig K. Murray, SR/WA

Letter 12 Response – Craig Murray

Comment 12-1: *Applicant Kaiser has shown to be understanding and cooperative with the incorporated North San Rafael community such as immediate past project to drop plans for a planned surface parking lot at the open space play fields across from its 99 Montecillo Road facility in exchange for a parking structure built within its real property fee-owned site. Kaiser staff was very easy to work with our Terra Linda Homeowners Association (TLHOA) at that time and location. Kaiser, through a series of review meetings, included many items in the project brought forward by the HOA such as electric vehicle parking stations. With this site to provide relief of current hospital site density, Kaiser will be bringing much needed increased tax base and perhaps a set amount of pharmacy sales and, as per statement by the Kaiser Planner, 70 new jobs to North San Rafael with this office reuse and accommodation of principally Staff vehicles in a multi-level, set back parking structure.*

Response to Comment 12-1:

The comment is noted.

Comment 12-2: *Suggestion to San Rafael and consultants related to project is to have a compendium of project acronyms and terms that may not be familiar to the community it is presenting to. From this particular meeting I tracked the following terms and acronyms that could have been compiled in a translational language single or few page document: LU, PD, Peak Hour Trips, CEQA, Fair Share, Traffic Impact Fees, Travel Demand Fees, PC, Sensitive Receptors, MM, BAAQMD, GHG, MOU, MOB, VMT, TDM, FTIA, DEIR, APN*

Response to Comment 12-2:

The list of Acronyms and Abbreviations section follows the Table of Contents in the DEIR. Each time an acronym is listed in a specific DEIR chapter, it is first spelled out in its entirety, and the appropriate acronym then follows in parentheses.

Comment 12-3: *Class II Bike Lane and from Cal Trans Officials Patricia Maurice, District Branch Chief, Local Development, Intergovernmental review letter: "Bike Proof Grate" (presumably this is on grade in bike path of travel lane just west of the Cal Trans Lucas Valley Road/Smith Ranch Road Overcrossing structure and unclear what the proofing represents it should certainly not be bicyclists themselves. Ms. Maurice or Stephen Conteh 510-286-5534, stephen.conteh@dot.ca.gov may clarify and perhaps show how safe this is compared to these on grade drainage grates built by Cal Trans and within the bike lanes in the incorporated portion of San Rafael at the top of the Puerto Suehello hill. These have been found to be obstacles and could place children and others on bicycles in the path to quickly divert into the designated vehicle travel lanes.).*

Response to Comment 12-3:

The reference to bike-proof grates is included in the April 4, 2018 Caltrans letter response to the DEIR. Per the Caltrans website, a bike-proof grate allows for stormwater or drainage to pass

through a grate while allowing bicycles to travel safely across. This is achieved through a multitude of designs that limit the gaps or spaces between the metal portions of the grate such a bicycle tire could not fall through or become stuck.

Comment 12-4: *Cal Trans is asking Kaiser to mitigate by providing a Class II Bicycle lane to the freeway ramp. Thanks to the applicant, Cal Trans is taking this on and most importantly the challenge is really with the City to make this Class II bikeway along Lucas Valley/Smith Ranch Road to the County Recreational Facilities at end of Smith Ranch Road and to sign, strip and connect this accommodation to connect to the regional 9-County San Francisco Bay Trail located also at the west end of Smith Ranch Road area. (This may help prevent the lack of the safe use of these new facilities like the new signed, marked class II bike lane all of about 3-car lengths in southwest corner of new Las Gallinas Avenue/Freitas Parkway intersection improvements as designed and provided by the City).*

Response to Comment 12-4:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

Comment 12-5: *City should encourage Kaiser to design the 476-stall garage, if it is not already, to be expandable. This may be with knock out panels and designated landscaped area for future parking structure expansion.*

Response to Comment 12-5:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

Comment 12-6: *Relocation of the Sanitary Sewer Line within the project and utility changes should be discussed and detailed upfront with associated Special District representatives.*

Response to Comment 12-6:

The Project has been reviewed by the LGVSD, which provided comments regarding sewer capacity and requirements for the relocation of the sanitary sewer line under the surface parking lot. The LGVSD also provided specific conditions of approval regarding the location, permitting, and construction of the new sanitary line, as well as conditions specific to LGVSD fees and other operational requirements.

Comment 12-7: *Any green standards to incorporate into the Structure that will reduce Green House Gasses (GHGs) such as one Neighbor mentioning a generator fueled and byproduct emissions from its diesel fuel design and consider alternative fuel sources such as natural gas.*

Response to Comment 12-7:

Per the discussion in Impact GHG-1 on page 4.4-12, the project will comply with green building standards to reduce GHG emissions. Furthermore, Project approvals would include a condition that requires the project to comply with green building standards.

Comment 12-8: *Page 13 of the Staff Report speaks to County and Neighborhood groups to meet and mitigate traffic intersection improvements as necessary for the project but primarily outside the incorporated City jurisdiction. Identify and engage these groups.*

Response to Comment 12-8:

As discussed in Master Response #1 in Chapter 3, there is no identified intersection improvement for the Las Gallinas Drive / Lucas Valley Road intersection. However, as part of mitigation measure MM TRAF-3, Kaiser would contribute a fair-share contribution to the future improvement of this intersection. If and when intersection improvements are developed for this intersection, the County of Marin Department of Public Works would be the lead agency and would coordinate outreach to various neighbors and interested parties.

Comment 12-9: *Perform project fiscal analysis. Show expected contribution amounts by applicant and others besides the city. If dollar expectations could be determined, then show percentages of offsite required improvements and what each other government entity will need to contribute. Identify who will own and manage these new facilities.*

Response to Comment 12-9:

Please see Master Response #1 for a discussion about fair-share contributions.

Comment 12-10: *Have the San Rafael Bicycle and Pedestrian and Advisory Committee meet, review and provide comments on project and area necessary improvements. Ask Marin County Bicycle Coalition to also review, provide comments on project plans.*

Response to Comment 12-10:

The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. However, the Project plans have been routed to various public agencies and interested groups and stakeholders. No comments have been received from either the San Rafael Bicycle and Pedestrian and Advisory Committee or the Marin County Bicycle Coalition. All public comment and review will be evaluated in the staff report regarding the merits of the Project.

April 24, 2018

Concerned Mont/San Rafael Park
home-owner.

Sandra Levy
11 Corte Capistrano
San Rafael
(415) 608-8621

As a Mom of young children
I am concerned about air & noise
pollution this development will
generate.

13-1

S Levy
SANDRA LEVY

Letter 13 Response – Sandra Levy

Comment 13-1: *As a mom 8 young children, I am concerned about air & noise pollution this development will generate.*

Response to Comment 13-1:

The DEIR does include evaluation for impacts related to air and noise specific to “sensitive receptors” or nearby residents within a 1,000 feet of construction activities. Although the analysis in Chapters 4.3, 4.4, and 4.5 include data specific to construction of the Project, impacts from construction activities was found to be less than significant after implementation of mitigation measures MM AIR-1 and MM NOISE-1, which require implementation of best management practices during construction to reduce air and noise impacts.

3.4 References

City of San Rafael Development Impact fee for Traffic Mitigation

North County Advocates v. City of Carlsbad, 241 Cal.App.4th 94 (2015)

http://www.dot.ca.gov/hq/esc/oe/project_plans/highway_plans/stdplans_US-customary-units_10/viewable_pdf/d077b.pdf

Institute of Transportation Engineers (ITE) *Trip Generation Manual*, (9th Edition).

CHAPTER 4

Oral Comments (Planning Commission Public Hearing April 24, 2018)

4.1 Introduction

This chapter contains the oral comments made during the April 24, 2018 public hearing to accept comments on the DEIR. The copied comments from the hearing is included in this section followed by responses to each bulleted comment. The City of San Rafael does not provide meeting minutes or a transcription for Planning Commission hearings; as such, the comments outlined below are not a verbatim accounting of the meeting, but are reproduced to best represent the commenters' statements. Pursuant to the *CEQA Guidelines Section 15087(i)*, public hearings are not required (but rather encouraged) as part of the public review process. Because there is no written transcript of the hearing, the responses to comments in this section is not as comprehensive as those provided in Chapter 3, but where possible, the responses refer back to the Master Responses or individual written responses in Chapter 3.

Some comments that were made during the public comment hearing on April 24, 2018 do not pertain to CEQA environmental issues, nor address the adequacy of the analysis contained in the DEIR. Responses to such comments, though not required, are included to provide additional information. Similar to the responses provided in Chapter 3, when an oral comment does not directly pertain to environmental issues analyzed in the DEIR, does not ask a question about the adequacy of the analysis contained in the DEIR, expresses an opinion related to the merits of the project, and/or does not question an element of or conclusion of the DEIR, the response notes the comment and may provide additional information where appropriate.

4.2 Oral Comments Response – Town Council Public Hearing (April 24, 2018)

Comment Pub-1: Reuel Brady

- a. *President of the Terra Linda HOA since 2006. Terra Linda HOA has worked with Kaiser and partnered to make community better.*
- b. *Number one concern has been traffic.*
- c. *“I applaud the vision to reduce congestion in the Terra Linda area by repurposing medical offices away from the Montecito campus....See the need for change....Applaud Kaiser’s attempt to improve their work environment and keep services close”*

Response to Comment Pub-1:

- a) This comment is noted.

- b) This comment is noted.
- c) This comment is noted.

Comment Pub-2: Michael Sharp

The commenter also included a written letter that is included as Comment Letter #5 in Chapter 3.

- a) *“The Draft EIR failed to identify that bringing more cars into the area is going to increase Greenhouse Gases (GHG)”*.
- b) *Disagrees with DEIR Section 4.4.6 that says that “Impact GHG-3: The Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to GHG (Less than Significant)”*.
- c) *Also says he “contacted California Environmental Quality Act (CEQA) experts who agree that the increase in traffic and the removal of mature trees will increase the creation of “Green House Gas’s” due to emissions of commuter vehicles of employees and Kaiser members making trips by car.”*
- d) *Concerned about increasing per capita vehicle miles when there are feasible mitigations such as agreements with adjacent owners who has surplus parking, free shuttles to and from local hubs, and finding additional Transportation Demand Management solutions for Kaiser employees and members.*
- e) *Opposes the parking structure.*
- f) *The increase in GHG during construction will negatively impact the health of people who live within 1000 feet of the project.*

Response to Comment Pub-2:

- a) Please refer to Master Response #5 for further discussion on GHG emissions.
- b) Please refer to Master Response #5 for further discussion on GHG emissions.
- c) Please refer to Master Response #5 for further discussion on GHG emissions.
- d) Kaiser has included a Transportation Demand Management (TDM) program (on page 3-18 of the DEIR) as part of the Project. The TDM specifically provides for incentives to use alternate forms of transportation, including subsidizing public transit, providing a shuttle service to the SMART station and other Kaiser facilities, and encouraging bicycle use. Please also refer to Master Response #3 for further discussion on Project parking.
- e) The comment is noted.
- f) DEIR Chapter 4.3, *Air Quality*, in the DEIR evaluated Project impacts to sensitive receptors within 1,000 feet of the Project site. As discussed in Impact AIR-3, the BAAQMD recommends using a 1,000-foot screening radius for identifying community health risks to sensitive receptors. The closest sensitive receptors would be located in residences at the end of Salvatore Way to the west, and uphill, from the Project site. However, implementation of mitigation measure MM AIR-1, on page 4.3-16, requires best management practices and control measures during construction activities to reduce Project impacts to less than significant levels.

Comment Pub-3: Craig Murray

- a) *Worked on Terra Linda HOA with Reuel Brady*
- b) *Kaiser has been thoughtful neighbor, has always cooperated and “done the right thing”*

- c) *Would like to see economic impacts, who will pay for the mitigations? For example, how much will the improvements at intersection cost and who will pay for it? What percentage will Kaiser pay for?*
- d) *Questions about planning documents and acronyms, can there be a list of what the acronyms mean to make sure public understands the documents, and definitions of things like “grate bike lane”, MOU, MOB, VMT, etc.*
- e) *Concerns about the bike lane under the freeway overpass, it is very dangerous. Can San Rafael work with Caltrans to make this a Class 2 bike lane?*

Response to Comment Pub-3:

- a) The comment is noted.
- b) The comment is noted
- c) Please see Master Response #1 for a more detailed response related to the fair-share contributions.
- d) Acronyms and Abbreviations are listed in the beginning of the DEIR and within each chapter. The first time an acronym is listed in a specific DEIR chapter, it is first spelled out in its entirety, and the appropriate acronym then follows in parentheses., the first instance is spelled out followed by the acronym in parentheses. Please also see Response to Comment #12-1 and #12-2 in Chapter 3.
- e) The MOU, and coordination effort, is meant to accommodate the requirements of Caltrans or the County of Marin such that proposed improvements would be consistent with future upgrades and improvements. Although not part of the project, expansion of bike lanes under the US 101 freeway overpass have been addressed in discussions with Kaiser and Caltrans and would be evaluated through the design review phase of the improvements. The bike lane along Lucas Valley Road / Smith Ranch Road is outside the scope of the proposed Project. Although the Project will trigger the need to improvements to the Los Gamos Drive / Lucas Valley Road intersection, including providing for lane widening to accommodate new turn lanes and a Class II bike lane, the Project’s impact does not extend to the area east of the Highway 101 underpass.

Comment Pub-4: Michael Brook

- a) *The signal will actually worsen Lucas Valley traffic*
- b) *Not clear that the coordination of lights will help*
- c) *Need MOU for that signal, can we also get MOU for all the construction that needs to be done to improve that area? “There will be 3x the amount of traffic in that area”*
- d) *“Sounds like the DEIR says the traffic will get worse and there is no mitigation, this is not acceptable”*

Response to Comment Pub-4:

- a) The DEIR evaluated impacts to Level of Service (LOS) at existing intersections near the subject Property. As a result of the Project, the LOS for the Los Gamos Drive / Lucas Valley Road intersection will drop below the allowable threshold for non-signalized intersections (see page 4.6-18). With the addition of the traffic signal, motorists on Lucas Valley Road would experience added delays as they currently never stop with the existing side-street stop control but would have to

stop when the traffic signal provides green time to northbound movements on Los Gamos Drive. However, the addition of the signal would improve intersection operations to an acceptable LOS D, under the Existing plus Project scenario. The introduction of a signal will reduce LOS impacts and will be interconnected with other signals in the immediate area. This interconnection requires coordination with County of Marin and Caltrans operated intersections for the express purpose of improving local traffic conditions. Please also refer back to Master Response #5 in Chapter 3 for a discussion on new traffic trips.

- b) In order to construct the traffic signal at Los Gamos Drive and Lucas Valley Road, several agencies would be consulted for a coordinated review and approval. As such, the design, installation, and timing of the new signal would be coordinated with other agencies and other traffic signals to create an efficient and working circulation network.
- c) An MOU, between the City of San Rafael, County of Marin, and Caltrans, will be prepared for the management and maintenance of the traffic signal at Los Gamos Drive and/ Lucas Valley Road.
- d) The conclusion in the DEIR regarding traffic impacts does not state that traffic will get worse with no mitigation to reduce the impact. Although there will be an increase in vehicle trips, which would create a traffic impact, or worsen the existing condition, the mitigation measures recommended in Chapter 4.6, *Transportation and Circulation* would in fact reduce the potential impacts to less than significant. However, because a number of the recommended mitigation measures fall outside of the City's sole jurisdiction and require inter-agency coordination and ultimate approval from the County of Marin, the DEIR determined that the specific impacts would be significant and unavoidable until such time as these improvements are authorized and implemented.

Comment Pub-5: Monica Rosenberg

- a) *Anyone who is a member at Kaiser who has decision-making power should recall themselves because there is a conflict of interest.*
- b) *Also seems like the neighbors along Lucas Valley Road are not informed about the trip increases and traffic impacts. They should be informed of 5400 more trips to the intersection.*

Response to Comment Pub-5:

- a) The San Rafael City Attorney has confirmed that a Planning Commissioner's being a member of the Kaiser Permanente health network is in of itself not a conflict that would necessitate recusal. If a Commissioner has a financial stake in Kaiser, or in the development of the Project, then, depending on the facts at hand, that would likely result in a conflict.
- b) As detailed in Master Response #4 and #5 in Chapter 3, the DEIR has evaluated the increase in vehicle trips as a result of the proposed Project.

Comment Pub-6: Cecil Nielson

- a) *Concerned about impact on views from her house, from hiking in the hills. The glare at night will impact view of stars at night. There will be a glow.*
- b) *Concerned about traffic impacts*

- c) *Concerned about views of trees from the freeway (this is on the most scenic freeways in Marin)*
- d) *We should take our time, protect our children*
- e) *We have a lot of sudden oak death here, and this project will cause more trees to be lost, views will be impacted*
- f) *Cecil Nielson-Spoke for neighbor who couldn't be there*

Response to Comment Pub-56:

- a) While private views are not a CEQA issue of concern, the DEIR nonetheless did evaluate views from public vantage points and concluded that the Project would not impact views to scenic resources in the area. The Project is required by the San Rafael Municipal Code to provide a photometric lighting study to ensure that light spillage will not adversely impact neighbors.
- b) This comment is noted. Please see Master Responses #4 and #5 in Chapter 3 for additional traffic related discussion.
- c) The majority of tree removals proposed as part of the Project are parking lot landscape/ornamental trees. The Project is proposing to replace 34 trees, many of which will be live oak and valley oaks to the northwest of the parking structure. Views to the Project site would include natural areas of woodland conditions, including untouched areas above and to the west of the proposed parking structure.
- d) The comment is noted.
- e) Impacts to trees and other sensitive biological communities were evaluated in the Biological Resources section of the Initial Study. Sudden Oak Death is a common pathogen that causes decline in oak populations throughout Marin County. However, the Project would not result in further contribution to Sudden Oak Death. Furthermore, the Project is proposing to replace 34 native trees, including live oak and valley oaks.
- f) The letter submitted by Sandra Levy is included in Chapter 3, as Comment Letter #13.

Comments from Commissioners:

Comment PC-1: Barrett Schaefer

- a) *Goal for tonight- not to approve or decide anything. It is to air ideas and thoughts on the projects*
- b) *Big concern is traffic, intersections, onramp and offramp, thoroughfare, already a lot of people commuting.*
- c) *Presentation by staff was great, tonight's meeting is to accept public testimony, direct staff to prepare Final EIR and response to comments*
- d) *Would like to know how big the Terra Linda HOA is, how many members?*
- e) *Would like to look at roundabouts*
- f) *Would employees be replaced at Montecillo campus?*

Response to Comment PC-1:

- a) This comment is noted.
- b) This comment regarding general traffic is noted.
- c) This comment is noted.
- d) Information regarding the Terra Linda HOA membership will be included as part of the City response to the merits of the Project prior to the PC hearing.
- e) The City of San Rafael Department of Public Works has stated that a typical roundabout diameter is about 125' across, therefore making the roundabout infeasible within the existing available right-of-way. Furthermore, roundabouts are typically used when traffic patterns are similar in all directions. The higher volume of traffic along Lucas Valley Road is greater than Los Gamos Drive. Finally, because this intersection has been identified for a potential off-ramp improvement in the 2003 Caltrans Project Study Report (PSR) (see Figure 4.6-16 on Page 4.6-63), the design and overall intersection configuration would need coordination and approval from Caltrans and Marin County should a roundabout be considered for the improvement.
- f) Kaiser Permanente has stated that it does not intend to replace (or backfill) employees at its Montecillo campus who relocate to the 1650 Los Gamos building. Rather, existing physical spaces would be "modernized" to accommodate current medical needs and practices.

Comment PC-2: Mark Lubamersky

- a) *He is a Kaiser member, will check if there is a conflict of interest.*
- b) *Also wants to know cost of improvements and what percentage will Kaiser pay?*
- c) *How about considering Roundabouts?*
- d) *Works at Terra Linda High School- traffic is bad there*

Response to Comment PC-2:

- a) The San Rafael City attorney has confirmed that a Planning Commissioner's being a member of the Kaiser Permanente health network is not a conflict that would necessitate recusal. If a Commissioner has a financial stake in Kaiser

or in the development of the Project, then, depending on the facts at hand, that would likely result in a conflict.

- b) See Master Response #1 for fair-share contributions.
- c) As described in response to comment PC-1 above, the configuration of Lucas Valley Road is not ideal for a roundabout and preliminary inter-agency coordination indicates that a different intersection configuration will be implemented.
- d) The comment suggests that traffic around Terra Linda high school is already congested and that relocating Kaiser employees to the new MOB will help alleviate existing delays. Although the *FTIA* prepared for the Project used a conservative traffic estimate, it is anticipated that relocation of existing employees will reduce traffic trips to the main hospital campus. However, this was not a focus of study in the *FTIA*.

Comment PC-3: Larry Paul

- a) *Traffic is a big issue.*
- b) *If PC will make Statement of Overriding Considerations, the economic impact of improvements- how much will it cost and what will Kaiser pay?*
- c) *Size of Parking Lot – 476 spaces for 315 employees + patients, maybe don't need all of these spaces?*
- d) *Traffic Management Plan - Carpooling, bus, biking- maybe would eliminate some of the parking requirements?*
- e) *Aesthetics- Kaiser altered design, get design that works, spots, traffic, etc, will help achieve proper balance, find something that is good for Kaiser AND the neighborhood.*
- f) *When they mention 3700 additional trips per day, break that down to show this is over 12-hour period, works out to 300 trips per hour, or 5 trips per minute. Helpful to see breakdown.*
- g) *Doesn't like roundabouts*
- h) *Should also look at lighting of the parking garage, make sure lighting is not obtrusive*

Response to Comment PC-3:

- a) This comment is noted.
- b) Please see Master Response #1 in Chapter 3 for a discussion on fair-share and cost of improvements.
- c) As noted in Chapter 3: *Project Description* and discussed in Master Response #3 in Chapter 3 of this Response to Comments, Kaiser has stated that they require a higher ratio than what is typically required due to frequency of patient turnover. Kaiser has a program-wide parking ratio requirement of 5 spaces per 1,000 gsf (5:1,000 gsf) for all outpatient medical buildings, as members are often infirmed or physically unable to take advantage of alternative modes of transportation. The resulting parking surplus ensures that Kaiser's members who do not have, or cannot access, other modes of transit can make their appointment. In addition, the surplus tends to improve internal circulation and reduce vehicle queuing at ingress points. Although the Project does not achieve

the 5:1,000 gsf requirement, Kaiser has determined that a parking ratio of 4.85:1,000 gsf will satisfy appointment scheduling at peak visitation for services proposed at the Project site.

- d) The Project's TDM Program is intended to reduce single occupancy vehicle trips to the Project site and thus reduce overall impacts to traffic, air quality, GHG emissions, and noise. Less vehicles accessing the site could mean less requirement for parking spaces.
- e) The parking structure will be reviewed by the San Rafael Design Review Board for final design approval and recommendation to the Planning Commission for Project approval.
- f) The ITE Trip Generation Manual does not provide trip generation for a 12-hour period of time, only for daily and peak hour periods. This is due to the fact that Level of Service (LOS) analysis for intersections is prepared, according to the Highway Capacity Manual, for one-hour periods. Daily trip generation data is provided to inform the development of daily and peak hour forecasts, because some jurisdictions use daily forecasts as the basis for road segment impact assessment and sizing, and to inform other studies including noise and VMT analysis. It is reasonable to assume, though, that virtually all of the weekday daily trips generated by an employment use such as a medical office building would occur during a 12-hour period between approximately 7:00 AM and 7:00 pm.
- g) This comment is noted.
- h) The Project's Initial Study completed in 2017 contains a mitigation measure AES-1 requiring California Building Code night-sky compliant lighting and will be included in the MMRP (Chapter 5 of this Response to Comments) and as a condition of approval. Furthermore, the Project will include a photometric lighting study to be reviewed by the City of San Rafael Design Review Board to ensure that the project doesn't include light spillage onto neighboring properties.

Comment PC-4: Jeff Schoppert

- a) *Will check with Legal if there is a conflict of interest for Kaiser members*
- b) *Draft EIR is substantial document, hard to remember every detail of everything they read,*
- c) *Should ask the applicant to talk more about the net effect on traffic trips - EIR should take into consideration GHG shift from one location to another,*
- d) *FEIR should provide more info on baseline project and low vacancy vs. existing uses for traffic impact analysis. Should traffic analysis addresses the existing uses, explain the difference between the two analyses, bottom line.*

Response to Comment PC-5:

- a) Please refer to Response PC-2 regarding conflicts for Kaiser members.
- b) The DEIR incorporated findings from the *FTIA* prepared for the Project, which assumed a conservative estimate of traffic trips to and from the site. In addition, the DEIR also evaluated air quality and GHG emissions related to the increase in traffic trips. As the GHG emissions impact analysis focused on

the Project's compliance with the City's *General Plan 2020* and the CCAP and Greenhouse Gas Reduction Strategy, the net effect of additional traffic trips at the 1650 Los Gamos Drive site is based on the Project's overall compliance with the CCAP. In general, by moving employees from one location to another, this would be considered a net benefit to overall GHG emissions impacts.

- c) Please see Master Response #5 in Chapter 3 regarding occupancy and AM/PM peak hour trips. The Existing conditions analysis assumes the existing building occupancy. As discussed in Master Response #4, the Project's impact is based on the Project's increase in traffic over what the maximum traffic the site could generate, or 100-percent general office occupancy, as allowed by the *San Rafael General Plan 2020*. Only the Baseline and Cumulative conditions evaluate the building with 100-percent occupancy. The *FTIA* prepared for the Project assumed a conservative analysis and assumed all trips generated by the site were new trips, thus, the Project was not credited for trips transferring from one location to another.
- d) Fehr & Peers conducted some additional analysis for informational purposes that assumed the existing occupancy under baseline and cumulative conditions. The results of this analysis found that Baseline with Existing Occupancy and Cumulative with Existing Occupancy operate similar to the Baseline and Cumulative conditions, and findings from the EIR would not likely change with these assumptions.

Comment PC-5: Jack Robertson

- a) *Is a Kaiser member*
- b) *Is concerned no certainty that transportation improvements would be made*
- c) *This project should not happen without transportation improvements*
- d) *LVR/LG is a dangerous intersection, the street lighting is bad at night*
- e) *Need a clearer picture of how improvements will be constructed*
- f) *Parking structure should have EV charging stations*
- g) *TDM - seems like a very small impact to reduce 12 trips*
- h) *Consolidate the TDM for this site and hospital site*

Response to Comment PC-5

- a) Please refer to Response PC-2 regarding conflicts for Kaiser members.
- b) The Project's Statement of Overriding Considerations would acknowledge that the timing for the improvements would not coincide with City approval. However, City staff will require condition of approvals that would require Kaiser to make fair-share contributions for proposed improvements, as well as restrict issuance of specific building permits without benchmarks for improvements being met.
- c) The comment is noted.
- d) The Project's intersection improvements would include street lighting as part of the new construction and this lighting would meet City and County

standards for public improvements. This will be evaluated and reviewed as part of design and permitting.

- e) Prior to final Project approval, an MOU will be prepared and agreed to by all applicable parties to memorialize the funding and maintenance of any proposed improvements.
- f) This comment is noted. As required per the California Green Building Standards Code, EV charging stations will be provided. A total of 39 EV charging stations, 13 per floor, are proposed as part of the Project.
- g) The 12 trips discussed in MM-TRAF 2 are the number of vehicle trips that must be removed from the Miller Creek on-ramp to Miller Creek off-ramp freeway segment in order to achieve a less than significant impact. As discussed in mitigation measure MM TRAF-2, the TDM strategies may yield a Project vehicle trip generation reduction of up to 12-percent if maximally effective, which corresponds to a reduction of 12 less trips at the Miller Creek on and off ramps north of the Project site. If the TDM can reduce the impact by the minimum 12 trips, it would result in a less than significant impact. Ideally, the annual report requirement of the mitigation measure would indicate a far greater reduction than the 12 trips required.
- h) Kaiser has indicated that it will create a cohesive program for all Marin facilities as feasible.

Comment PC-6: Sarah Loughran

- a) *Kaiser member*
- b) *GHG emissions - what does 3,700 additional trips mean in terms of GHG increase - how is it not possible?*
- c) *63 trees being removed - how is this not significant?*
- d) *County has approved a shuttle from SMART to the Civic Center - can this project combine with the County's efforts to provide shuttle service*

Response to Comment PC-6:

- a) Please refer to Response PC-2 regarding conflicts for Kaiser members.
- b) Please see Master Response #6 in Chapter 3 for additional details regarding the GHG emissions analysis and conclusions.
- c) Kaiser is proposing to remove 63 trees, the majority of which are parking lot landscaping trees. Kaiser is also proposing to replace 34 trees, including many native oak trees surrounding the parking structure. The Initial Study for the Project evaluated the loss of 63 trees from a biological impact specific to habitat loss and found that the removal of landscaping trees does not constitute an environmental impact. Furthermore, there is a mitigation measure included that requires a pre-construction tree survey to prevent impacts to potential nesting birds.
- d) The proposed Project includes a TDM measure that provides shuttle service to the SMART station at the Marin County Civic Center.

CHAPTER 5

Mitigation Monitoring and Reporting Program

5.1 Introduction

CEQA requires public agencies to adopt monitoring and reporting programs or conditions of project approval to mitigate or avoid the identified significant effects when approving projects with EIRs that identify significant impacts (Public Resources Code Section 21081.6(a)(1)). The lead agency adopting measures to mitigate or avoid the significant impacts of a proposed project is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). Mitigation measures required by the lead agency that reduce or avoid significant project impacts and that are not incorporated into the project design or program, may be required as conditions of project approval as set forth in a Mitigation Monitoring and Reporting Program (MMRP). The project program must be designed to ensure compliance with mitigation measures during project implementation.

This MMRP includes the mitigation measures identified in the DEIR required to address the significant impacts associated with the proposed Project. The required mitigation measures are summarized in this MMRP; the full text of the impact analysis and mitigation measures is presented in the DEIR in Chapter 4, *Environmental Impact Analysis*. In addition, mitigation measures identified in the Initial Study are also incorporated in the MMRP.

5.2 Format

The MMRP is included as **Table 5-1** below. Only the mitigation measures included in the DEIR and Initial Study required to address significant impacts are included in this program. Each mitigation measure is set out in full, followed by a summary of monitoring requirements and responsibilities. The column headings in **Table 5-1** are defined as follows:

- **Mitigation Measures (Adopted as Conditions of Approval):** This column presents the mitigation measure identified in the DEIR.
- **Implementation Responsibility:** Identifies the responsible party associated with implementation of the migration measure.
- **Agency Responsible for Monitoring:** Contains an assignment of responsibility for the monitoring and reporting tasks.
- **Monitoring and Reporting Action:** The outcome from implementing the mitigation measure.
- **Mitigation Schedule:** The general schedule for conducting each mitigation task, identifying where appropriate both the timing and the frequency of the action.

- **Compliance Verification:** The lead agency may use this column to document the person who verified the implementation of the mitigation measure and the date on which this verification occurred.

5.3 Enforcement

If the proposed Project is approved, the full MMRP would be incorporated as a condition of approval. Therefore, all mitigation measures addressing significant impacts must be carried out in order to fulfill the requirements of Project approval. A number of the mitigation measures would be implemented during the course of the Project's development review process. These measures would be confirmed on plans, in reports, and in the field prior to construction. Most of the remaining mitigation measures would be implemented during the Project's construction phase. Other measures include on-going review, such as the requirement to submit a yearly survey of the Project's TDM Program.

TABLE 5-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
Aesthetics					
<p>MM AES-1: Prior to the issuance of any building permits, the Project applicant shall submit to the satisfaction of the Community Development Department Director, Project building plans that include a photometric lighting study demonstrating that outdoor lighting fixtures meet the requirements of the California Energy Code (known as Part 6, Title 24 of the California Code of Regulations).</p>	Applicant/Contractor	Planning Department/ Building Division	<p>City of San Rafael Planning Department to confirm photometric study and lighting plan.</p> <p>City of San Rafael Building Department to review Plan for compliance with required lighting specifications</p>	Prior to issuance of building permit.	<p>Verified by: Date:</p>
Air Quality					
<p>MM AIR-1. Include basic measures to control dust and exhaust during construction. During any construction period ground disturbance, Kaiser Permanente shall ensure that the Project contractor implement measures to control dust and exhaust. Implementation of the measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less than significant level. The contractor shall implement the following best management practices that are required of all projects:</p> <ol style="list-style-type: none"> 1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). 	Applicant/Contractor	Planning Department/ Building Division	<p>City of San Rafael Planning Department to confirm site and equipment specifications are identified on applicable construction plans and specifications.</p> <p>City of San Rafael Building Division to inspect site during construction to ensure compliance with Project construction plans.</p>	<p>Prior to issuance of building permit.</p> <p>During construction</p>	<p>Verified by: Date:</p>

TABLE 5-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</p> <p>6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</p> <p>7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</p> <p>8) Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.</p>					
Biological Resources					
<p>MM BIO-1: Prior to issuance of a grading or building permit, the Project sponsor shall conduct a preconstruction nesting bird and bat survey. Preconstruction surveys shall include the following:</p> <ol style="list-style-type: none"> 1) Perform any vegetation trimming and/or removal outside of the bird nesting season (Sept. 1 – Feb. 14); 2) Provide a worker environmental awareness training for construction personnel; 3) Perform preconstruction surveys for nesting migratory birds by a qualified biologist no more than 72 hours prior to the start of construction for activities occurring during the breeding season (February 15 to August 31); and 4) If work is to occur within 300 feet of active raptor nests or 50 feet of active passerine nests, non-disturbance buffers will be established at a distance sufficient to minimize disturbance. 	Applicant/Biologist/ Contractor	Planning Department	<p>City of San Rafael Planning to review and approve a qualified biologist.</p> <p>Conduct pre-construction survey per time frames described in Mitigation Measure BIO-1.</p> <p>Follow protocol described in Mitigation Measure BIO-1 during construction.</p>	<p>Prior to issuance of building permit.</p> <p>Prior to construction</p> <p>During construction</p>	<p><i>Verified by:</i> <i>Date:</i></p>

TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
Hydrology and Water Quality					
<p>MM HYDRO-1: Prior to grading activities, the Project applicant shall prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be prepared by a Qualified SWPPP Developer (QSD). The SWPPP shall include the minimum Best Management Practices (BMPs) required for the identified risk level. The SWPPP shall be designed to address the following objectives:</p> <ol style="list-style-type: none"> 1) All pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; 2) Where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated; 3) Site BMPs are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and 4) Stabilization BMPs installed to reduce or eliminate pollutants after construction are completed. 5) BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual. 	Applicant/Contractor	Building Department / Public Works/ RWQCB	<p>City of San Rafael / RWQCB to review and approve SWPPP</p> <p>Implement BMPs prior/during construction</p>	<p>Prior to issuance of building permit.</p> <p>Field inspections during construction</p>	<p><i>Verified by:</i> <i>Date:</i></p>
<p>MM HYDRO-2: Prior to a certificate of occupancy, the Project applicant shall verify that operational stormwater quality control measures that comply with the requirements of the current Phase II Small MS4 Permit have been implemented. Responsibilities include but are not limited to:</p>	Applicant/Engineer	Public Works/Planning Department/ RWQCB	City of San Rafael DPW reviews Project Applicant Checklist for NPDES Permit Requirements and Post-Construction BMP	Prior to certificate of occupancy	<p><i>Verified by:</i> <i>Date:</i></p>

TABLE 5-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<ol style="list-style-type: none"> 1) Designing BMPs into Project features and operations to reduce potential impacts to surface water quality and to manage changes in the timing and quantity of runoff associated with operation of the Project. These features shall be included in the design-level drainage plan and final development drawings. 2) The proposed Project shall incorporate site design measures and Low Impact Development design standards, including minimizing disturbed areas and impervious surfaces, infiltration, harvesting, evapotranspiration, and/or bio-treatment of stormwater runoff. 3) The project applicant shall establish an Operation and Maintenance Plan. This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the Phase II Small MS4 Permit. 4) Funding for long-term maintenance of all BMPs shall be specified. 			<p>Operation and Maintenance Plan</p> <p>Implement BMPs prior/during to construction</p> <p>Review annual monitoring report</p>	<p>Field inspections during construction</p> <p>Post-construction</p>	
Noise					
<p>MM NOISE-1. Incorporate best management practices during Project construction activities. Reasonable regulation of the hours of construction, as well as regulation of the arrival and operation of heavy equipment and the delivery of construction material, are necessary to protect the health and safety of persons, promote the general welfare of the community, and maintain the quality of life. In compliance with the City's Municipal Code, the Project shall adhere to the allowable construction hours of 7:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on Saturdays. Construction activities are prohibited on Sundays and national holidays. Additionally, the construction crew shall adhere to the following construction best management practices to reduce construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the Project vicinity. Construction Best Management Practices</p>	Applicant/Contractor	Planning Department/ Building Department	<p>City of San Rafael Planning / Building to review and approve project specifications and grading and construction plans for inclusion of this measure into specifications.</p> <p>Implement noise reduction measures during construction hours</p>	<p>Prior to issuance of building permit.</p> <p>Field inspections during construction</p>	<p><i>Verified by:</i></p> <p><i>Date:</i></p>

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>In order to reduce potential significant impacts from temporary construction activities, Kaiser Permanente shall be required to develop a construction noise control plan, including, but not limited to, the following available controls:</p> <ol style="list-style-type: none"> 1) Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. 2) Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. 3) Unnecessary idling of internal combustion engines should be strictly prohibited. 4) Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors. 5) Utilize "quiet" air compressors and other stationary noise sources where technology exists. 6) Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the Project site during all Project construction. 7) Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. 8) Route construction-related traffic along major roadways and as far as feasible from sensitive receptors. 9) Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the Project site. 					

TABLE 5-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>10) The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.</p> <p>11) Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.</p> <p>12) The implementation of the reasonable and feasible controls outlined above would reduce construction noise levels emanating from the site by 5 to 10 dBA in order to minimize disruption. With the implementation of these controls, as well as the Municipal Code limits on allowable construction hours, and considering that construction is temporary, the impact would be reduced to a less-than-significant level.</p>					
Transportation and Circulation					
<p>MM TRAF-1. Signalize Lucas Valley Road / Los Gamos Drive. In coordination with the City of San Rafael, the County of Marin Department of Public Works, and Caltrans, Kaiser Permanente shall pay the fair share cost to signalize the Lucas Valley Road / Los Gamos Drive intersection to mitigate poor operating conditions. Signalizing the intersection is consistent with improvements identified in the San Rafael General Plan 2020. Due to its close proximity to the US-101 Ramp terminal intersections, the new signal should include traffic signal interconnect and be coordinated with the adjacent interchange signals. Additionally, interagency coordination will be required during design, construction and maintenance of the new signal. Therefore, a memorandum of understanding (MOU) will be required between the City of San Rafael and the County of Marin to document the management and maintenance of</p>	Applicant/Contractor	Public Works/ Planning Department/ County of Marin/ Caltrans	<p>City of San Rafael to prepare MOU prior to Project approval.</p> <p>Review MOU and project plans to ensure measure is implemented.</p> <p>Installation of signal / conduit</p>	<p>Prior to final occupancy</p> <p>Site inspection post-construction</p>	<p><i>Verified by:</i> <i>Date:</i></p>

TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>the new signal, since the US 101/Lucas Valley interchange signals and the new Lucas Valley Road / Los Gamos Drive signal would need to be operated and maintained by one or multiple agencies.</p> <p>Signalizing the intersection would mitigate the project impact to a less than significant impact. However, implementation of the mitigation measure requires the intersection improvements to be fully funded and constructed. Therefore, until and unless the MOU and fair-share contributions are finalized, and the design and construction of the intersection is permitted and approved, the Project will result in a significant and unavoidable impact.</p>					
<p>MM TRAF-2. Kaiser Permanente shall implement additional TDM measures. Kaiser Permanente shall implement a TDM program, as described in Chapter 3: <i>Project Description</i> and Section 4.6.4.2: <i>Transportation Demand Management Considerations</i> of this traffic impact chapter (Section 3.1.1 of the 1650 Los Gamos Drive FTIA). Implementation of these TDM strategies would go beyond what is required as part of the PD District, with the goal of reducing employee vehicle trips, thereby reducing the Project’s impact on the regional network.</p> <p>Based on a quantitative assessment of the TDM measures proposed in the <i>1650 Los Gamos Drive FTIA</i>, the TDM strategies may yield a Project vehicle trip generation reduction of up to 12-percent between the Miller Creek Off-Ramp and Miller Creek On-Ramp. If maximally effective, implementation of the Project’s TDM strategies would result in a project trip reduction of up to 10-15 AM peak hour trips along this segment, which would result in a project contribution of less than a 0.01 increase in volume to capacity ratio. As presented in the 1650 Los Gamos Drive FTIA, implementation of the Project’s TDM measures will achieve this reduction, however, Kaiser will annually quantitatively analyze and monitor employee vehicle trip generation data via comprehensive employee surveys and make adjustments to its TDM measures as needed to achieve the stated reduction.</p>	Applicant/Contractor	Public Works/ Planning Department	City of San Rafael Planning/DPW to review TDM to ensure measures are implemented.	<p>Prior to final occupancy</p> <p>Applicant to submit report by December 1st, annually.</p>	<p>Verified by: Date:</p>

TABLE 5-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>As described in the 4.6.4.2: <i>Transportation Demand Management Considerations</i> and the Fehr & Peers <i>1650 Los Gamos Drive FTIA</i>, Kaiser Permanente shall conduct an annual employee survey and prepare a monitoring report that evaluates the effectiveness of the Project’s TDM Plan. The TDM program will be submitted to the City of San Rafael for comment and review. Kaiser Permanente will coordinate with the City of San Rafael, as necessary. The annual survey shall demonstrate how the TDM measures reduce the Project’s impact to peak-hour volume to capacity ratio for the Miller Creek On and Off Ramp.</p>					
<p>MM TRAF-3. Improve Intersection Operations at Lucas Valley Road/Las Gallinas Avenue. Improvements at the Lucas Valley Road/Las Gallinas Avenue intersection have yet to be identified through the City of San Rafael’s General Plan 2020; however, several vehicle capacity improvements (such as reconfiguring the intersection to remove channelized turn islands or replacing the existing signal with a roundabout) may be considered by the City of San Rafael to mitigate poor operating conditions at the intersection. Capacity increasing improvements include various trade-offs, however. For example, adding capacity could facilitate more vehicular traffic but this could also have an adverse impact to pedestrians and bicyclists and result in the diversion of more pass-through traffic along Las Gallinas Avenue and an increase in VMT. Although mitigation is possible at this intersection to address Project impacts, the intersection is outside of the City’s jurisdiction and specific improvements have yet to be identified by either the City of San Rafael or the County of Marin. As such, the feasibility of potential mitigations will require further study and coordination with local neighborhood groups, the City of San Rafael, and the County of Marin, who operates and maintains the existing traffic signal. Since the City cannot legally implement mitigation measures outside of its jurisdiction, this potential mitigation is infeasible from both a legal and public policy standpoint. Ultimately, the City of San Rafael, in coordination with the County of Marin, would be responsible for</p>	Applicant/Contractor	Public Works/ Planning Department/ County of Marin	Review MOU to ensure measure and fair-share contribution is implemented.	Prior to final occupancy	Verified by: Date:

TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>implementing improvements, of which Kaiser Permanente would pay its fair share; however, as discussed above, since the intersection is not part of a traffic fee program and intersection improvements have yet to be identified, the Project would result in a significant and unavoidable.</p>					
<p>MM TRAF-4. Signalize and Reconfigure the Lucas Valley Road/Los Gamos Drive Intersection. In coordination with the City of San Rafael Department of Public Works, the County of Marin Department of Public Works, and Caltrans, Kaiser Permanente shall pay a fair share contribution to the reconfiguring and signalization of the Lucas Valley Road/Los Gamos Drive Intersection. The San Rafael <i>General Plan 2020</i> (Exhibit 21 #2) identifies improvements at this intersection, including signalizing the intersection, adding dual westbound left turn lanes, reconfiguring the northbound approach, and removing existing striped channelized islands, as illustrated in Figure 4.6-13. Due to its close proximity to the US-101 Ramp terminal intersections, the new signal should include traffic signal interconnect and be coordinated with the adjacent interchange signals. Additionally, since the majority of the intersection is located within the County of Marin jurisdiction, interagency coordination will be required during design, construction and maintenance of the new signal. Furthermore, a memorandum of understanding (MOU) will be required between the City of San Rafael and the County of Marin to document the management and maintenance of the intersection and signals since the US 101/Lucas Valley interchange signals and the new Lucas Valley Road / Los Gamos Drive signal would be operated and maintained by one or multiple agencies.</p>	Applicant/Contractor	Public Works/ Planning Department/ County of Marin/ Caltrans	<p>Review MOU and project plans to ensure measure is implemented.</p> <p>Installation and construction of traffic signal and associated improvements</p>	Prior to final occupancy	<p>Verified by: Date:</p>

TABLE 5-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>Implementing these improvements would mitigate the Project’s impact to less than significant. However, until the intersection is fully funded, approved by the referenced public agencies, and constructed, the impact to the level of service would remain. Therefore, until and unless the MOU and fair-share contributions are finalized, the design and construction of the intersection is permitted and approved by all parties, the Project will result in a significant and unavoidable impact.</p>					
Cultural Resources					
<p>MM CULT-1: Protect Archaeological Resources Identified during Construction: The Project sponsor shall ensure that construction crews stop all work within 100 feet of the discovery until a qualified archaeologist can assess the previously unrecorded discovery and provide recommendations. Resources could include subsurface historic features such as artifact-filled privies, wells, and refuse pits, and artifact deposits, along with concentrations of adobe, stone, or concrete walls or foundations, and concentrations of ceramic, glass, or metal materials. Native American archaeological materials could include obsidian and chert flaked stone tools (such as projectile and dart points), midden (culturally derived darkened soil containing heat-affected rock, artifacts, animal bones, and/or shellfish remains), and/or groundstone implements (such as mortars and pestles).</p>	Applicant/Contractor	Planning Department	Applicant to retain qualified archaeologist to implement protocol described in Mitigation Measure CULT-1	Prior to and during construction	Verified by: Date:
<p>MM CULT-2: Protect Human Remains Identified During Construction: The Project proponent shall treat any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities according to applicable State laws. Such treatment includes work stoppage and immediate notification of the Marin County Coroner and qualified archaeologist, and in the event that the Coroner’s determination that the human remains are Native American, notification of</p>	Applicant/Contractor	Building Department/ Planning Department	<p>City of San Rafael Planning to verify mitigation measure on construction plans.</p> <p>Applicant to retain qualified archaeologist to implement protocol</p>	<p>Prior to issuance of grading permit</p> <p>During construction</p>	Verified by: Date:

TABLE 4-1: MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Agency Responsible for Monitoring	Monitoring and Reporting Action	Monitoring Schedule	Compliance Verification
<p>NAHC according to the requirements in PRC Section 5097.98. NAHC would appoint a Most Likely Descendant (MLD). A qualified archaeologist, Project proponent, County of Marin, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters.</p>			described in Mitigation Measure CULT-2		
<p>MM TRIBAL-1: Implementation of the unanticipated discovery measures outlined in Section V(b) and (d) above, address the potential discovery of previously unknown resources within the project area. If significant tribal cultural resources are identified onsite, all work would stop immediately within 50 feet of the resource(s) and the project applicant would comply with all relevant State and City policies and procedures prescribed under PRC Section 21074.</p>	Applicant/Contractor	Planning Department/ Federated Indians of Graton Rancheria	Applicant to immediately retain Tribal Historic Preservation Officer (THPO) to implement protocol described in Mitigation Measure TRIBAL-1	During construction	<i>Verified by:</i> <i>Date:</i>

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**APPENDIX A: CITY OF SAN RAFAEL DEVELOPMENT
IMPACT FEES**



Introduction

This handout is intended to inform individuals of the variety of fees that may be collected by the City for new development projects. This summary also describes fees collected by other agencies with jurisdiction within the City. In these instances, the fee is not noted, but a contact at the agency is identified for further information. Fees identified herein do not include Planning application fees.

Purpose of Fees

Fees collected are intended to offset the cost of providing services, to maintain the City’s infrastructure (e.g. streets, storm drains, sanitary sewers, etc.), or to compensate for development project impacts upon infrastructure.

<i>FEE NAME</i>	<i>FORMULA OR FEE AMOUNT</i>	<i>FEE PURPOSE</i>	<i>RESPONSIBLE AGENCY</i>
PARKLAND DEDICATION FEE	Number of Dwelling Units (for purchase only) x \$1,967.98	Required in conjunction with new residential subdivisions that generate dwelling units for purchase, pursuant to Chapter 15.09 of the City’s Subdivision Ordinance. Fee used for acquisition and improvement of parkland for additional population generated by new development. Collected as part of building permit for final map, whichever occurs first.	City of San Rafael
TRAFFIC MITIGATION FEE	\$4,246.00 per Net New AM <u>and</u> PM Peak Hour Vehicle Trips	Fee collected to compensate for impacts of new traffic generated by a development upon the City’s street system. Funds used for Citywide traffic improvements. Collected as part of the building permit.	City of San Rafael
MITIGATION MONITORING FEE	\$5,713.00 Deposit (includes up to 30 hours of staff time – additional hours billed annually at fully burdened hourly rate)	Fee collected to cover the cost of staff time to review compliance with conditions of project approval relating to reduction in environmental impacts identified for projects where a “Mitigated Negative Declaration” or “Environmental Impact Report”, prepared pursuant to the California Environmental Quality Act (CEQA) has identified such impacts.	City of San Rafael
WATER CONNECTION FEE	Contact Service Provider	Fee used to compensate for impacts on the water delivery system, and for improvements to the system.	Marin Municipal Water District CONTACT: (415) 945-1455
SEWER CONNECTION FEE	Contact Service Provider	Fee used to compensate for impacts upon sanitary sewer facilities, and for improvements to the system.	San Rafael Sewer District (South San Rafael) CONTACT: (415) 454-4001 Las Gallinas Valley Sanitary District (North San Rafael) CONTACT: (415) 472-1734

<i>FEE NAME</i>	<i>FORMULA OR FEE AMOUNT</i>	<i>FEE PURPOSE</i>	<i>RESPONSIBLE AGENCY</i>
DEVELOPMENT IMPACT FEE	<p>\$0.12 x Square Feet of Commercial Space. \$0.06 x Square Feet of Industrial Space.</p> <p>\$127.50 per Bedroom for Residential Uses</p>	Fee collected to cover the cost of the new development's impact upon public facilities and services in the City. Collected as part of a building permit.	City of San Rafael
SCHOOL FEE	<p>\$2.97 per new square feet for residential developments.</p> <p>\$0.47 per new square foot for non-residential developments.</p> <p>Updated 7/13/08</p>	<p>Fee collected to cover the cost of new development's impact upon school facilities. May be used for maintenance and/or expansion of facilities.</p> <p>Fee is NOT collected by the City, but rather by the school District. Proof of payment must be shown to the City before issuance of the building permit.</p>	<p>San Rafael City Schools CONTACT: (415) 492-3233</p> <p>Dixie School District CONTACT: (415) 492-3700</p>
AFFORDABLE HOUSING IN-LIEU FEE	<p>New residential (both rental and ownership) projects are required to provide affordable units on-site, pursuant to Section 14.16.030 of the City's Zoning Ordinance (see "Affordable Housing Requirements" brochure for specific details). Generally, residential projects provide the required affordable housing on site. If the affordable housing requirement results in a fractional unit of 0.5 or less, the requirement may be satisfied through an in-lieu fee.</p> <p>New non-residential development projects are required to comply with the City's Affordable Housing Requirements, pursuant to Section 14.16.030 of the City's Zoning Ordinance. Developers of non-residential projects may choose to pay the Affordable Housing In-Lieu Fee, rather than provide units on the project site. Current in-lieu fee for 1 affordable unit is \$331,070 (last updated 2018)</p>	Affordable Housing In-Lieu fees collected by the City are to be used to ensure the development of rental and ownership housing units for very low, low and moderate-income households. Collected as part of a building permit.	City of San Rafael
BUILDING PERMIT FEE	Required fees for review and issuance of building permits. At the time of issuance of building permit, additional fees are included on the permit Building Permits. Some of the more notable fees include:	Total building permit fee is <u>approx.</u> 4%-5% of entire valuation and is composed of a variety of sub fees, including building and fire plan check, building inspection, street maintenance (1% of valuation), General Plan implementation and maintenance fees, and other fees.	City of San Rafael
	<p>Building Permit Fee</p> <p>Fee is equal to 100% of Table3-A of Building Code, which is approximately 1.5% of valuation</p>	Fee collected to cover the cost of review of building permit plan review. Collected at submittal of building permit.	City of San Rafael
	<p>Building Permit Plan Check Fee</p> <p>Fee is equal to 75% of Table3-A of Building Code, which is approximately 1.1% of valuation</p>	Fee collected to cover the cost of review of building permit inspections. Collected at issuance of building permit.	City of San Rafael

<i>FEE NAME</i>	<i>FORMULA OR FEE AMOUNT</i>	<i>FEE PURPOSE</i>	<i>RESPONSIBLE AGENCY</i>
	<p>Fire Prevention Plan Check Fee</p> <p>Fee is equal to 32.5% of Table3-A of Building Code, which is approximately 0.48% of valuation</p>	Fee collected to cover the cost of plan review of building permit by Fire Prevention. Collected at issuance of building.	City of San Rafael
	<p>Street Maintenance Fee</p> <p>$\\$0.01 \times (\text{Valuation of Improvements} - \\$10,000.00)$</p>	Fee collected to cover the cost of maintenance of City streets, due to impacts of construction-related vehicles. Collected as part of a building permit.	City of San Rafael
	<p>General Plan Update Maintenance Fee</p> <p>9.6% Surcharge on Building Permit Fee</p>	Fee collected to cover the cost of periodic updates of the City's General Plan. Collected as part of a building permit.	City of San Rafael
	<p>General Plan 2020 Implementation Fee</p> <p>25.9% Surcharge on Building Permit Fee</p>	Fee collected to cover the cost of implementation of programs identified in the City's General Plan 2020. Collected as part of a building permit.	City of San Rafael

Last updated: 03.05.2018

APPENDIX B: FEHR & PEERS FREEWAY VOLUMES

Traffic Volumes Counts

Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	24 hour Period Hourly Counts																								24hr total	
										0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23			
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/30/2012	TUE	37	29	18	22	35	4	120	345	871	1371	1067	899	1097	1209	1330	1348	1327	1308	1390	1192	875	532	452	266	144	#####
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/29/2012	MON	53	38	22	30	39	100	311	825	1389	983	1007	1114	1131	1130	1190	1362	1399	1280	1349	1083	760	486	369	254	113	#####
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/28/2012	SUN	121	81	64	57	43	43	117	188	398	514	704	934	1015	1035	1043	1024	967	749	566	415	282	394	236	105	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/27/2012	SAT	118	60	56	37	30	54	119	253	531	769	962	1127	1147	1168	1176	1172	1036	912	779	566	459	397	320	189	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/26/2012	FRI	81	42	26	22	45	118	343	860	1367	1171	1038	1136	1230	1402	1447	1370	1331	1238	1187	1003	636	485	380	249	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/25/2012	THU	76	35	18	10	44	117	342	850	1416	1073	1019	1220	1259	1301	1414	1378	1370	1363	1137	755	589	469	305	145	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/24/2012	WED	72	40	25	15	42	108	335	789	1461	1085	1006	1200	1239	1274	1355	1396	1333	1312	1045	687	530	431	268	131	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/23/2012	TUE	59	24	22	18	36	109	343	846	1401	1067	899	1097	1209	1330	1348	1327	1308	1390	1192	875	532	452	266	144	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	10/22/2012	MON	0	0	0	0	0	0	0	0	0	0	0	371	1220	1348	1383	1403	1290	1234	913	591	409	388	261	109	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/24/2010	WED	81	41	29	19	63	136	521	1416	1826	1103	934	1147	1201	1194	1230	1351	1200	1281	1140	759	609	469	353	184	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/23/2010	TUE	83	38	43	22	47	164	506	1416	1825	1354	1353	1510	1644	1616	1824	1608	1674	1963	1682	995	781	587	450	178	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/22/2010	MON	67	41	21	28	65	107	514	1464	1927	1167	952	1061	1165	1305	1417	1377	1465	1461	1280	856	592	471	320	142	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/21/2010	SUN	167	88	75	39	30	51	131	207	361	545	791	1076	1236	1345	1273	1087	1170	1055	816	643	470	346	276	168	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/20/2010	SAT	206	123	70	40	38	68	177	318	480	675	776	1045	1241	1167	1235	1181	1132	1099	1096	859	628	579	374	285	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/19/2010	FRI	91	50	42	17	68	133	454	892	1093	1127	1027	1242	1263	1420	1384	1496	1318	1274	1179	1059	783	638	486	309	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/18/2010	THU	111	44	31	24	57	154	422	966	1357	1187	992	1151	1215	1283	1385	1305	1216	1378	1245	861	642	564	347	176	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/17/2010	WED	89	42	32	28	71	148	437	1015	1380	1027	934	1147	1201	1194	1230	1351	1200	1281	1140	759	609	468	353	184	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	02/16/2010	TUE	99	49	35	25	42	112	319	832	1326	1225	1162	1316	1324	1493	1574	1430	1296	1286	1263	942	716	521	360	217	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/20/2006	WED	86	48	35	32	50	117	318	899	1335	1161	1327	1459	1541	1558	1595	1407	1367	1381	1421	1111	773	616	361	189	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/19/2006	TUE	82	44	44	30	41	103	341	843	1432	1177	1303	1376	1401	1579	1488	1421	1324	1292	1214	1048	704	520	348	202	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/18/2006	MON	82	54	22	21	35	114	308	803	1433	1139	1220	1262	1429	1585	1448	1389	1354	1368	1189	879	683	496	290	154	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/17/2006	SUN	209	111	67	41	35	82	119	186	311	514	1103	850	998	1231	1261	1217	1262	1241	1041	633	514	404	267	164	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/16/2006	FRI	182	90	63	50	48	62	145	250	469	757	1124	1282	1370	1572	1598	1522	1292	1075	1092	833	633	491	348	#####		
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/15/2006	THU	98	71	43	20	51	96	342	967	1478	1286	1255	1463	1517	1572	1598	1406	1266	1270	1296	1029	734	562	502	305	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/14/2006	WED	91	47	35	23	37	113	364	918	1503	1256	1162	1316	1324	1493	1574	1430	1296	1286	1263	942	716	521	360	217	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	12/13/2006	TUE	102	62	40	23	40	115	345	854	1368	1165	1109	1184	1290	1220	1312	1268	1248	1231	1207	1034	684	525	401	257	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/18/2004	THU	108	61	30	24	43	122	336	799	1448	1276	1125	1161	1288	1334	1346	1276	1234	1282	1239	1031	658	493	371	177	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/17/2004	WED	81	33	28	23	28	112	347	838	1502	1122	1188	1172	1380	1334	1331	1245	1179	1241	1113	974	637	493	316	183	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/16/2004	TUE	78	40	22	30	29	121	319	852	1472	1263	1069	1159	1311	1322	1310	1353	1260	1196	1278	935	582	557	325	182	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/15/2004	MON	87	27	22	34	26	104	320	779	1373	1139	1107	1172	1310	1324	1399	1377	1256	1281	1162	852	570	465	292	144	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/14/2004	SUN	157	80	56	60	32	39	106	183	358	528	755	903	1127	1066	1057	1003	948	892	764	613	448	396	221	153	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/13/2004	SAT	163	88	83	50	23	66	135	255	528	746	969	982	1217	1120	1133	1157	1121	1082	990	862	541	446	417	287	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/12/2004	FRI	98	55	31	45	63	131	325	815	1447	1127	1109	1184	1290	1202	1312	1288	1248	1231	1207	1034	684	525	401	257	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/11/2004	THU	82	43	37	22	45	125	335	808	1432	1170	1016	1197	1306	1359	1348	1364	1176	1229	1144	1041	595	517	348	185	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	03/10/2004	WED	82	43	37	22	45	125	335	808	1432	1170	1016	1197	1306	1359	1348	1364	1176	1229	1144	1041	595	517	348	185	#####	
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	05/17/2001	THU	93	49	33	28	34	108	353	967	1476	1160	1088	1254	1283	1381	1338	1361	1220	1067	1087	1032	1049	805	601	401	193	#####
4	MRN	101	13.5	F	N		NB OFF TO MANUEL FREITAS PKWY	05/16/2001	WED	106	57	29	29	29	102	343	923	1385	1130	1120															

Traffic Volumes Counts

Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	24 hour Period Hourly Counts																								24hr total	
										0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24		
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/20/2004	TUE	55	43	25	24	42	164	371	753	1052	890	874	944	1066	1037	1086	1216	1180	1312	1025	722	572	495	222	145	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/19/2004	MON	72	52	34	27	36	169	350	746	857	914	894	966	993	1041	1024	1213	1216	1342	1012	685	428	446	228	125	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/18/2004	SUN	138	81	32	35	25	43	97	188	322	498	575	575	731	795	826	816	854	768	492	408	314	212	127	#####		
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/17/2004	SAT	159	85	27	41	25	56	122	306	516	668	818	913	953	1009	959	1010	996	882	849	683	524	541	382	263	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/16/2004	FRI	94	49	25	40	30	138	338	634	820	874	881	1056	1115	1108	1231	1188	1181	1269	974	769	597	570	322	263	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/15/2004	THU																										
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/10/2001	TUE	72	43	22	21	64	220	486	758	798	892	992	1090	1152	1091	1113	1298	1200	1419	1084	774	594	471	246	135	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/09/2001	MON	81	35	23	34	63	226	425	706	767	877	990	1083	1148	1106	1075	1168	1212	1412	994	731	588	417	265	128	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/08/2001	SUN	168	70	37	29	25	47	104	164	297	501	635	822	957	990	928	973	1020	832	795	566	356	342	213	156	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/07/2001	SAT	173	58	29	15	26	54	159	289	571	735	923	1015	1134	1088	1145	1117	1072	917	905	650	530	369	378	297	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/06/2001	FRI	71	50	37	31	72	178	416	666	800	810	905	1131	1131	1137	1056	1293	1169	1378	1045	783	606	683	356	251	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/05/2001	THU	84	43	15	33	71	222	439	747	838	892	982	1095	1207	1123	1122	1337	1221	1468	1006	783	540	649	284	158	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/04/2001	WED	67	32	24	21	64	206	466	752	907	896	993	1092	1266	1103	1073	1300	1229	1452	1051	797	542	500	255	134	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/03/2001	TUE	54	34	24	31	65	218	445	739	829	892	992	1090	1152	1087	1113	1298	1200	1419	1084	774	594	471	246	135	#####	
4	MRN	101	13.6	N	S		SB ON FR MANUEL FREITAS	04/02/2001	MON																										
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/30/2012	TUE	50	23	5	13	19	51	103	332	394	373	379	444	538	602	674	812	752	790	593	431	310	228	109	111	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/29/2012	MON	35	20	4	4	23	37	108	318	372	320	412	480	584	581	639	810	735	740	545	397	272	211	125	93	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/28/2012	SUN	54	24	21	13	11	27	40	107	188	228	356	400	505	579	597	545	435	344	278	167	218	98	107	#####		
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/27/2012	SAT	71	23	28	10	8	24	62	153	214	368	411	530	608	650	647	673	613	478	438	336	294	298	162	127	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/26/2012	FRI	65	20	6	10	16	43	99	312	435	384	403	511	653	657	763	918	697	682	539	519	414	392	180	180	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/25/2012	THU	47	27	12	7	15	37	100	306	415	351	392	505	625	612	690	829	771	701	559	363	328	251	126	111	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/24/2012	WED	49	19	6	11	18	37	112	322	434	378	398	502	620	667	635	802	699	685	523	364	309	265	109	105	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/23/2012	TUE	42	23	4	14	13	43	114	336	412	373	379	444	538	602	674	812	752	790	593	431	310	228	109	111	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/22/2012	MON	34	13	4	7	14	33	92	317	389	313	365	492	556	653	643	702	826	702	643	424	305	238	98	88	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/21/2012	SUN	76	23	16	17	9	17	29	114	153	264	345	384	461	563	532	542	465	428	345	223	175	80	88	88	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/20/2012	SAT	82	23	24	15	13	14	59	151	247	337	433	604	626	672	641	695	582	572	530	382	299	340	158	149	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	10/19/2012	FRI																										
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/24/2010	WED	41	25	17	12	12	39	111	342	428	386	421	476	606	595	638	750	727	664	508	377	285	281	124	107	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/23/2010	TUE	39	38	12	7	12	44	100	346	413	358	369	427	564	551	623	816	747	664	505	330	332	262	120	121	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/22/2010	MON	46	24	24	18	11	45	82	323	393	341	373	452	547	558	640	797	769	711	486	400	240	213	129	91	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/21/2010	SUN	70	45	15	12	13	19	48	101	159	215	277	349	425	514	515	548	537	484	398	271	207	141	90	80	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/20/2010	SAT	91	61	24	14	7	35	66	131	184	302	349	441	462	556	548	608	573	511	487	372	284	282	163	141	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/19/2010	FRI	56	32	17	13	15	39	95	257	292	356	399	487	606	661	651	811	699	702	544	429	317	335	166	193	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/18/2010	THU	42	20	13	12	14	32	96	272	333	329	368	433	575	575	629	725	731	663	507	377	285	303	116	119	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/17/2010	WED	61	36	13	11	10	36	102	235	321	337	421	476	606	595	638	750	727	664	508	377	285	281	124	107	#####	
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	02/16/2010	TUE																										
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	09/13/2007	TUE	39	26	21	11	16	54	103	313	421	329	398	440	647	627	627	624	735	695	724	512	399	324	269	113	113	#####
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	09/12/2007	MON	41	22	13	14	21	45	118	304	365	322	418	493	691	627	728	822	763	736	600	466	351	295	156	88	88	#####
4	MRN	101	13.6	N	NB	ON	FR EB MANUEL FRETS	09/11/2007	TUE	33	22	20	14	18	50	92	320	370	362	369	471	622	607	677	813	757	808	660	450	334	289	125	116	#####	
4	MRN	101	13																																

Traffic Volumes Counts

Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	24 hour Period Hourly Counts																								24hr total	
										0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24		
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/19/2010	MON	37	11	15	35	49	150	344	654	818	737	694	710	799	763	730	840	807	833	689	470	430	251	146	108	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/18/2010	SUN	93	38	15	18	25	34	99	164	290	437	503	629	736	748	671	677	684	567	612	454	325	290	117	81	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/17/2010	SAT	75	49	20	21	40	43	144	287	433	590	684	795	805	842	805	861	749	640	628	527	459	399	261	162	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/16/2010	FRI	68	31	21	27	59	126	283	457	695	702	703	776	837	784	878	902	856	830	659	546	440	443	244	187	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/15/2010	THU	32	31	24	29	55	151	321	608	763	663	699	709	859	810	907	884	834	912	515	385	385	266	266	177	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/25/2007	FRI	32	29	15	23	67	140	349	754	938	567	671	704	765	811	805	904	814	829	648	504	378	379	129	92	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/24/2007	WED	36	23	14	18	64	138	369	631	815	621	683	744	772	764	765	896	847	903	658	466	337	316	161	105	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/23/2007	TUE	31	24	16	19	68	158	353	657	1050	855	677	759	842	764	789	915	856	988	743	439	353	282	139	102	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/22/2007	MON	51	40	19	24	55	148	347	585	1027	703	635	730	821	729	785	874	870	851	628	442	347	279	129	87	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/21/2007	SUN	94	45	22	24	20	46	80	124	270	392	498	619	655	698	711	701	630	638	563	355	251	143	79	#####		
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/20/2007	SAT	84	48	32	15	29	59	123	231	424	595	673	715	778	801	834	837	828	740	681	492	377	375	240	192	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/19/2007	FRI	53	20	19	26	51	147	311	674	675	650	699	779	859	810	907	884	854	836	912	515	385	492	266	177	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/18/2007	THU	61	27	18	26	53	129	372	634	1096	613	666	743	816	756	822	941	835	900	670	499	446	387	165	94	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	01/17/2007	WED																										
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/23/2004	FRI	70	35	20	21	37	130	298	535	690	687	756	855	808	831	937	830	844	929	737	616	500	497	265	220	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/22/2004	THU	59	40	20	20	36	117	314	561	780	682	731	731	802	821	833	938	885	922	763	630	483	488	245	133	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/21/2004	WED	70	38	22	14	26	136	295	554	718	679	691	710	827	854	825	968	867	884	773	554	486	434	199	114	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/20/2004	TUE	41	33	18	18	36	142	301	561	817	686	687	708	779	750	846	930	850	915	753	565	467	409	179	113	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/19/2004	MON	62	44	24	21	31	146	289	561	660	699	689	732	755	739	772	846	882	929	737	523	436	364	192	93	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/18/2004	SUN	118	65	21	21	19	31	71	161	258	422	483	511	632	622	759	788	781	727	680	418	338	274	180	101	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/17/2004	SAT	138	68	18	30	19	45	102	237	417	540	664	752	763	828	874	831	816	732	707	574	448	486	281	220	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/16/2004	FRI	68	45	18	24	22	114	269	444	625	656	660	680	808	831	928	826	859	861	906	854	491	411	265	141	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/15/2004	THU																										
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/10/2001	TUE	54	38	18	19	51	184	388	559	597	664	739	814	875	834	886	983	878	866	834	613	487	382	193	104	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/09/2001	MON	62	29	22	30	48	193	353	524	564	648	774	840	856	831	822	913	882	967	731	563	481	339	196	100	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/08/2001	SUN	132	59	29	20	22	34	88	134	241	424	511	667	770	808	872	814	890	707	701	482	291	285	180	126	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/07/2001	SAT	146	51	29	12	20	49	133	221	465	596	769	842	938	887	967	946	928	771	772	553	461	493	320	244	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/06/2001	FRI	55	44	29	27	61	158	332	508	617	643	692	855	874	865	799	948	847	946	812	610	485	556	304	209	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/05/2001	THU	62	35	14	23	59	186	361	536	627	691	773	849	892	872	888	1044	892	1020	747	610	439	462	216	127	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/04/2001	WED	54	23	20	19	53	179	375	567	689	693	769	846	950	839	817	992	871	999	802	633	431	423	199	98	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/03/2001	TUE	41	27	21	26	53	182	354	554	634	664	739	814	875	841	886	993	876	966	834	613	487	382	193	104	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR EB MAN FRTAS	04/02/2001	MON																										
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/31/2013	THU	20	10	4	4	9	42	99	228	243	186	209	246	273	253	244	249	316	436	237	125	72	51	38	29	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/30/2013	WED	13	3	3	3	9	42	87	218	230	182	207	216	242	219	243	255	295	400	251	124	80	85	41	23	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/29/2013	TUE	12	4	4	7	11	37	96	219	226	187	186	225	236	233	246	262	297	412	237	121	79	69	25	29	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/28/2013	MON	9	6	3	2	15	36	91	232	202	195	205	235	240	229	235	267	332	384	243	121	71	73	36	19	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/27/2013	SUN	17	7	10	6	1	6	15	35	61	101	119	146	159	184	154	134	123	118	119	68	66	98	23	21	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/26/2013	SAT	25	9	11	3	7	12	32	58	131	136	138	206	171	176	177	162	174	199	147	83	54	52	41	38	#####	
4	MRN	101		13.7	N	S	SEG SB ON FR WB MAN FRTAS	01/25/2013	FRI	10	4	4	6	14	37	91	228	199	203	217	254	297	265	254	244	282	344	210	107	82	98	31	20	#####	

Traffic Volumes Counts

Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	24 hour Period Hourly Counts																								24hr total		
										0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24			
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/27/2012	SAT	22	6	6	6	6	1	6	26	43	62	71	110	118	150	146	163	176	189	141	125	114	67	21	22	45	58	#####
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/26/2012	FRI	10	7	5	3	9	10	4	32	84	125	104	142	189	220	214	236	314	331	306	232	130	76	106	45	59	#####	
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/25/2012	THU	16	8	1	3	6	7	10	42	84	122	132	152	219	259	252	269	380	353	247	113	88	86	36	44	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/24/2012	WED	15	4	3	2	8	7	32	114	137	111	159	248	228	272	298	412	402	340	206	105	87	66	43	46	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/23/2012	TUE	20	1	2	4	5	8	35	109	100	108	127	169	203	183	264	297	396	371	247	154	69	79	39	48	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/22/2012	MON	24	4	5	0	2	13	37	104	111	93	137	165	188	213	239	303	366	367	192	85	59	71	38	34	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/21/2012	SUN	36	16	5	5	8	2	15	32	68	101	155	155	176	252	287	394	368	138	179	113	52	59	36	43	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/20/2012	SAT	24	9	4	3	8	10	24	34	62	87	101	127	161	170	166	177	148	174	181	96	106	92	70	59	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	10/19/2012	FRI	10	3	6	0	3	10	31	105	131	121	114	114	155	243	218	225	284	357	284	263	168	103	112	66	55	#####	
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/24/2010	WED	11	5	5	2	4	13	30	104	108	134	139	167	208	205	209	289	360	360	236	119	80	64	36	48	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/23/2010	TUE	16	7	5	1	4	13	30	104	108	134	139	167	208	205	209	289	360	360	236	119	80	64	36	48	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/22/2010	MON	11	7	5	1	4	13	30	104	108	134	139	167	208	205	209	289	360	360	236	119	80	64	36	48	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/21/2010	SUN	20	10	8	5	7	7	12	36	64	94	117	166	165	163	133	148	144	126	86	79	30	32	20	32	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/20/2010	SAT	25	9	8	7	6	12	19	28	52	84	114	116	135	157	160	168	149	149	111	98	57	77	51	74	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/19/2010	FRI	17	6	5	1	4	14	29	67	113	132	133	194	221	191	254	289	362	325	231	124	76	115	181	77	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/18/2010	THU	19	6	7	3	3	14	31	68	115	163	163	179	232	256	232	247	308	367	394	237	136	67	58	34	37	#####	
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/17/2010	WED	9	4	7	2	1	17	29	66	99	118	114	167	208	185	206	289	360	360	236	119	80	64	36	46	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	02/16/2010	TUE	10	6	3	5	2	9	38	124	88	147	164	233	299	257	280	267	372	378	270	143	102	264	48	43	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/12/2007	WED	11	6	3	5	5	14	53	113	72	96	95	165	181	223	210	279	372	381	238	165	89	102	136	53	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/11/2007	TUE	13	10	8	3	2	11	43	121	85	113	119	150	207	174	240	288	354	404	283	168	97	75	39	39	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/10/2007	MON	9	3	5	3	3	15	31	85	103	110	157	166	193	163	217	275	376	365	265	159	82	47	49	58	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/09/2007	SUN	24	13	15	4	6	6	26	69	90	125	160	189	231	237	240	289	301	166	100	48	49	82	41	#####			
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/08/2007	SAT	21	9	5	5	8	5	38	79	63	89	151	189	219	235	249	291	311	207	114	70	82	43	52	#####			
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/07/2007	FRI	14	9	8	2	2	22	43	109	83	110	119	189	200	215	264	265	370	356	210	140	104	275	67	59	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/06/2007	THU	18	2	6	6	2	19	37	115	100	147	164	233	299	257	280	267	372	378	270	143	102	264	48	43	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	09/05/2007	WED	10	2	6	6	2	19	37	115	100	147	164	233	299	257	280	267	372	378	270	143	102	264	48	43	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/19/2004	FRI	17	15	13	5	8	21	51	115	87	107	107	143	201	201	187	259	285	354	318	220	143	105	124	64	37	#####	
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/18/2004	THU	13	11	4	5	1	16	46	106	107	164	196	318	327	233	253	271	346	371	240	151	101	202	55	31	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/17/2004	WED	12	7	9	6	7	21	44	109	112	123	146	158	211	238	233	268	368	365	236	121	106	84	53	23	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/16/2004	TUE	16	9	6	6	5	17	45	123	86	121	125	178	228	202	261	261	334	374	263	143	111	82	49	19	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/15/2004	MON	11	12	5	3	4	17	35	109	103	113	102	152	205	219	237	294	334	374	222	131	99	56	35	27	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/14/2004	SUN	36	10	7	11	11	5	18	34	75	148	190	185	221	198	188	174	187	129	108	77	54	49	31	37	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/13/2004	SAT	21	17	10	8	10	12	18	67	72	113	145	163	149	184	169	179	187	177	145	93	63	82	217	48	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/12/2004	FRI	16	12	8	6	8	19	35	112	79	113	143	174	201	187	259	285	354	318	220	143	105	124	64	37	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/11/2004	THU	7	15	7	2	6	16	56	129	126	153	175	249	302	221	258	283	347	345	227	137	91	249	54	24	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	03/10/2004	WED	7	7	7	2	6	16	56	129	126	153	175	249	302	221	258	283	347	345	227	137	91	249	54	24	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	05/17/2001	THU	7	8	7	5	4	9	32	112	139	169	207	271	279	246	274	293	374	374	335	160	124	74	48	29	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	05/16/2001	WED	16	6	5	4	6	11	39	100	130	109	109	176	195	242	242	294	389	414	239	145	108	91	41	24	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	05/15/2001	TUE	16	6	5	4	6	11	39	100	130	109	109	176	195	242	242	294	389	414	239	145	108	91	41	24	#####		
4	MRN	101		13.8	N	N	NB ON FR REDWOOD HWY	05/14/2001	MON	10																										

Traffic Volumes Counts

Dist Cnty	Rte	Prefix	PM Leg	Dir	Description	Date	Day	24 hour Period Hourly Counts																								24hr total	
								0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24		
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	04/19/2004	MON	44	24	14	15	26	139	470	695	964	730	725	719	832	869	824	843	729	835	602	441	279	193	163	82	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	04/18/2004	SUN	68	39	27	24	33	51	134	176	253	414	594	753	625	780	812	739	760	575	433	301	221	189	127	74	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	04/17/2004	SAT	59	42	30	24	22	58	149	194	341	486	660	792	852	728	793	689	705	676	541	368	270	209	136	#####		
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	04/16/2004	FRI	49	28	27	14	39	117	432	723	786	753	712	898	972	903	898	808	816	907	727	538	396	256	181	128	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	04/15/2004	THU	31	18	14	18	35	198	489	647	822	728	884	872	973	807	858	835	787	778	739	491	305	255	144	80	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/28/2001	WED	46	15	14	17	33	196	510	628	835	899	793	870	993	787	841	861	771	769	754	449	300	207	138	76	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/27/2001	TUE	35	18	13	19	41	199	494	638	897	840	760	816	955	899	860	887	735	798	765	536	261	224	140	74	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/26/2001	MON	34	19	25	13	34	185	484	558	844	832	760	816	955	899	860	887	735	798	765	536	261	224	140	74	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/25/2001	SUN	76	40	36	25	27	52	160	186	312	478	725	821	892	914	798	791	708	627	470	333	208	187	110	61	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/24/2001	SAT	62	32	28	17	30	77	165	267	454	669	764	914	895	863	871	829	794	694	643	498	290	270	143	111	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/23/2001	FRI	35	24	17	18	39	203	555	1040	982	831	835	862	997	899	922	906	843	853	744	570	356	244	162	98	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/22/2001	THU	39	16	10	21	64	176	498	671	881	934	884	872	973	907	858	835	787	778	739	491	305	255	144	80	#####	
4 MRN	101	13.9 F	S		SB OFF TO MANUEL FREITAS PKWY	03/21/2001	WED	31	18	14	17	35	198	489	647	822	728	884	872	973	807	858	835	787	778	739	491	305	255	144	80	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/30/2012	TUE	31	21	8	4	20	77	192	587	886	634	492	580	655	665	735	921	892	813	739	497	316	268	143	83	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/29/2012	MON	42	24	11	9	24	68	204	528	862	593	540	609	654	671	716	800	749	809	657	443	307	218	131	62	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/28/2012	SUN	67	49	41	12	14	25	61	120	257	431	536	537	552	595	531	514	540	437	344	253	181	245	88	65	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/27/2012	SAT	63	42	34	10	15	20	69	165	346	421	553	600	614	572	629	534	572	495	399	357	263	262	202	125	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/26/2012	FRI	40	16	13	6	19	74	170	538	816	614	528	691	754	739	791	791	857	755	645	590	345	306	244	155	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/25/2012	THU	45	17	13	7	25	54	182	531	808	687	510	623	693	706	717	749	769	763	675	391	348	276	173	94	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/24/2012	WED	38	15	11	7	20	65	198	486	860	650	562	647	676	742	742	742	780	763	778	657	374	345	310	164	73	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/23/2012	TUE	33	15	8	6	16	65	194	542	787	634	492	580	655	665	735	921	892	813	739	497	316	268	143	83	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/22/2012	MON	44	14	8	6	17	63	184	544	844	665	533	605	653	687	703	727	722	763	634	535	340	256	155	64	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/21/2012	SUN	84	34	32	17	10	17	42	133	221	361	539	609	695	644	645	505	476	505	422	258	254	172	72	#####		
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/20/2012	SAT	64	34	30	13	13	17	71	158	319	477	534	534	565	586	610	619	624	557	574	536	430	312	254	178	152	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	10/19/2012	FRI	38	19	15	10	17	73	201	548	830	641	474	590	805	757	777	783	771	751	620	486	363	289	220	124	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/22/2010	WED	38	19	15	10	17	73	201	548	830	641	474	590	805	757	777	783	771	751	620	486	363	289	220	124	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/21/2010	TUE	43	31	16	8	18	78	178	496	768	621	521	583	707	702	702	770	723	684	761	700	465	369	267	149	85	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/20/2010	MON	32	26	8	9	20	81	190	480	835	614	544	677	734	674	764	769	761	727	777	634	448	279	259	163	70	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/19/2010	SUN	77	38	36	14	8	18	40	122	232	374	508	578	547	612	595	453	467	517	415	327	242	176	112	49	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/18/2010	SAT	83	51	26	19	9	20	57	187	315	410	577	615	595	611	554	524	559	536	491	380	353	264	181	141	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/17/2010	FRI	48	37	22	6	20	76	165	528	786	697	539	687	682	739	807	847	789	760	675	491	362	306	221	157	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/16/2010	THU	46	24	15	12	16	65	167	514	765	682	568	676	692	732	746	744	711	730	669	547	390	291	198	113	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/15/2010	WED	41	23	11	8	20	102	181	516	815	702	538	591	706	793	719	795	714	727	689	524	404	281	196	97	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	09/14/2010	TUE	45	19	15	12	17	78	167	485	734	634	527	631	674	708	798	690	813	714	728	657	487	398	294	152	85	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	02/24/2010	TUE	45	19	15	12	17	78	167	485	734	634	527	631	674	708	798	690	813	714	728	657	487	398	294	152	85	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	02/23/2010	MON	44	25	11	13	13	70	160	434	735	665	533	581	695	644	645	505	476	505	422	258	254	172	72	#####		
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	02/22/2010	SUN	29	15	10	13	14	59	157	432	785	603	510	605	694	643	743	729	796	767	783	687	455	318	222	142	74	#####
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	02/21/2010	SAT	98	61	34	18	17	7	33	109	183	280	358	438	461	538	437	457	437	439	309	265	185	162	106	72	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	02/20/2010	FRI	78	40	41	12	10	18	47	157	334	487	512	578	551	603	554	531	472	475	456	354	267	275	201	163	#####	
4 MRN	101	14.5 F	N		NB OFF TO SMITH RANCH RD	02/19/2010	THU	49	27	20	11	18	65	151	381	62																	

Traffic Volumes Counts

						24 hour Period Hourly Counts																													
Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24hr total	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/11/2001	FRI	10	2	4	3	2	8	31	75	120	131	123	150	207	179	208	240	220	207	208	112	44	51	40	30	#####	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/10/2001	THU	11	1	4	4	7	6	27	97	134	110	112	136	158	145	187	214	264	282	221	130	87	55	47	18	#####	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/09/2001	WED	8	4	3	2	2	9	37	90	133	115	118	148	174	132	173	248	310	226	145	74	66	42	24	#####		
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/08/2001	TUE	12	3	1	2	3	7	30	82	132	117	118	150	153	127	149	235	266	274	229	115	79	59	28	18	#####	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/07/2001	MON	5	3	1	4	5	9	46	87	117	115	107	152	162	120	185	266	254	266	242	139	73	59	33	15	#####	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/06/2001	SUN	19	6	5	3	1	4	9	15	42	76	102	115	113	80	75	96	98	98	71	58	33	25	17	16	#####	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/05/2001	SAT	23	6	5	1	1	7	17	41	66	93	126	145	149	126	146	128	97	80	69	33	24	32	28	33	#####	
4	MRN	101		14.7	N	N	NB ON FR LUCAS VALLEY RD	05/04/2001	FRI	8	13	6	8	18	138	445	622	689	505	333	314	332	343	180	239	224	208	197	116	63	58	34	29	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/17/2013	THU	8	7	3	9	30	144	396	665	756	542	312	352	334	383	324	329	339	301	271	189	115	90	81	59	25	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/15/2013	TUE	18	10	4	7	21	132	437	630	763	519	332	315	347	357	343	358	326	344	287	181	112	116	58	24	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/14/2013	MON	9	10	6	14	21	153	398	633	741	401	358	313	330	307	345	340	308	305	264	191	112	78	49	29	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/13/2013	SUN	26	20	13	7	10	15	40	107	129	198	234	206	218	238	266	254	228	228	178	132	85	79	38	13	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/12/2013	SAT	19	14	13	6	13	28	78	148	218	218	257	206	258	274	270	242	245	226	174	123	104	82	72	51	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/11/2013	FRI	22	13	4	3	22	119	364	593	645	449	326	351	346	364	353	361	354	349	233	205	114	99	75	36	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/10/2013	THU	18	15	8	5	17	105	392	522	668	488	333	314	332	348	332	370	309	342	252	176	135	81	59	25	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	01/09/2013	WED	10	9	6	10	18	118	333	542	593	421	322	357	374	371	371	370	372	299	312	275	181	126	76	53	33	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/23/2010	FRI	13	6	7	10	18	118	333	542	593	421	322	357	374	371	371	370	372	299	312	275	181	126	76	53	33	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/22/2010	THU	11	7	9	4	29	124	320	547	629	457	345	326	320	355	342	353	340	326	264	180	133	76	65	29	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/21/2010	WED	20	9	6	9	31	120	357	590	712	725	333	323	360	350	358	348	346	325	255	180	124	99	53	19	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/20/2010	TUE	11	6	6	4	20	124	352	537	711	490	330	369	347	358	355	329	308	291	248	155	128	77	45	27	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/19/2010	MON	13	6	9	7	15	119	339	504	649	425	305	311	346	378	393	343	341	298	237	141	87	71	48	23	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/18/2010	SUN	24	14	14	9	6	14	6	8	14	238	255	237	236	246	245	230	230	220	146	118	91	58	24	#####		
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/17/2010	SAT	16	13	11	11	11	28	56	87	164	167	221	277	271	221	228	228	274	274	176	92	85	43	#####			
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/16/2010	FRI	9	13	7	4	4	16	109	306	473	523	472	306	357	374	351	391	332	347	325	263	198	127	70	72	50	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	04/15/2010	THU	4	10	10	10	27	42	332	340	365	492	332	330	365	364	353	351	324	313	259	181	105	81	65	33	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/14/2006	THU	10	2	5	6	22	184	368	660	743	590	346	356	380	412	358	342	320	420	271	181	124	81	51	55	33	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/13/2006	WED	12	7	7	8	20	163	393	664	710	618	380	346	339	382	320	332	288	314	224	160	108	106	62	32	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/12/2006	TUE	10	5	5	5	24	155	365	567	616	706	617	377	319	395	364	317	297	308	271	158	103	106	40	28	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/11/2006	MON	9	10	7	5	25	178	396	631	806	481	367	349	366	347	347	339	317	295	207	130	83	77	44	24	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/10/2006	SUN	20	10	9	9	10	14	43	93	118	153	258	195	236	216	229	193	189	213	156	116	73	70	50	21	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/09/2006	SAT	26	7	10	11	11	27	69	131	179	255	242	262	263	237	254	244	196	223	187	141	83	90	74	47	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/08/2006	FRI	12	7	5	5	29	144	396	668	628	403	353	378	373	375	372	344	319	655	273	167	121	98	81	36	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/07/2006	THU	14	5	8	10	28	156	422	643	666	674	409	366	358	412	358	342	320	420	271	181	124	91	55	33	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	12/06/2006	WED	14	7	11	13	13	26	97	227	203	242	279	264	227	256	246	255	221	220	192	164	103	90	81	66	33	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	05/15/2004	SAT	28	13	11	13	13	26	97	227	203	242	279	264	227	256	246	255	221	220	192	164	103	90	81	66	33	#####
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	05/14/2004	FRI	15	7	10	9	29	159	459	653	633	411	350	357	405	405	321	344	335	340	280	174	117	116	74	48	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	05/13/2004	THU	8	7	6	13	27	160	417	648	760	545	367	330	376	334	346	366	290	318	249	183	136	91	62	35	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	05/12/2004	WED	14	7	9	9	26	166	398	667	722	545	351	340	362	381	346	323	308	335	258	184	109	100	53	31	#####	
4	MRN	101		14.7	F	S	LUCASVLY/SMTHRNCH-SB OFF	05/11/2004	TUE	8	7	5	14	27	158	452	65																		

Traffic Volumes Counts

				24 hour Period Hourly Counts																																
Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24hr total		
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/19/2004	MON	9	2	4	9	10	9	5	135	185	178	201	252	300	281	343	427	474	483	236	146	98	73	40	22	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/18/2004	SUN	21	13	15	12	9	5	9	36	53	123	177	156	239	168	165	188	148	169	102	92	60	46	24	17	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/17/2004	SAT	18	9	5	12	11	8	21	46	81	124	175	203	218	214	197	194	173	139	136	91	76	122	50	40	17	4	#####
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/16/2004	FRI	19	8	15	7	10	8	47	149	158	187	216	310	331	338	354	410	479	409	263	161	78	120	67	49	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/15/2004	THU	17	8	5	7	12	8	39	134	152	172	208	320	324	332	345	435	478	496	244	214	121	88	58	44	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/14/2004	WED	19	10	7	9	9	8	41	138	153	183	210	273	321	311	353	450	437	445	250	174	98	100	67	34	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/13/2004	TUE	16	5	8	10	11	9	33	146	151	178	204	249	335	310	343	416	420	500	243	172	122	84	62	35	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	04/12/2004	MON	10	7	6	4	10	15	60	118	168	171	197	256	335	304	339	391	448	496	275	179	100	102	40	37	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/17/2001	THU	11	7	6	4	10	15	60	118	168	171	197	256	335	304	339	391	448	496	275	179	100	102	40	37	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/16/2001	WED	14	2	3	2	8	12	44	116	158	208	197	278	319	336	342	406	503	553	312	193	141	125	64	40	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/15/2001	TUE	8	5	6	1	8	12	53	119	153	178	159	259	331	325	336	425	515	549	306	169	123	112	32	27	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/14/2001	MON	9	3	4	7	7	16	40	119	132	167	202	256	316	271	368	411	498	530	297	147	125	84	39	24	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/13/2001	SUN	18	13	10	3	4	7	19	26	53	66	137	133	239	147	183	200	166	140	105	133	72	49	27	23	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/12/2001	SAT	20	15	10	7	6	5	27	51	77	120	172	184	191	198	178	190	174	148	149	121	113	97	44	42	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/11/2001	FRI	16	7	2	5	14	14	44	136	132	181	222	278	321	356	407	463	481	509	302	169	115	136	67	50	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/10/2001	THU	9	9	4	4	7	18	43	94	148	171	197	256	335	304	339	391	453	482	300	213	143	127	63	30	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/09/2001	WED	16	6	2	2	5	16	49	104	144	180	151	239	292	310	314	406	480	524	296	191	140	104	60	25	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/08/2001	TUE	18	9	1	3	6	16	42	112	157	159	210	282	294	278	333	425	471	548	336	172	141	117	49	27	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/07/2001	MON	9	8	3	3	7	9	46	109	139	162	210	283	312	308	322	433	477	520	286	160	127	77	47	32	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/06/2001	SUN	27	13	8	9	3	4	22	31	55	74	173	158	237	147	145	149	149	148	132	84	71	65	26	16	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/05/2001	SAT	35	14	10	3	9	7	22	64	84	161	147	188	209	226	174	188	174	134	142	97	72	114	49	40	4	#####	
4	MRN	101	14.9	N	N		NB ON FR SMITH RANCH RD	05/04/2001	FRI	11	3	1	1	4	13	33	142	175	149	120	265	355	377	479	860	790	542	310	176	150	166	42	46	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/30/2012	TUE	19	8	8	1	6	10	30	152	173	107	119	154	152	196	273	279	293	269	324	239	105	74	62	24	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/28/2012	SUN	30	14	21	8	4	12	9	29	58	153	156	224	222	241	196	223	205	180	128	96	70	85	42	29	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/27/2012	SAT	33	16	8	7	1	4	13	41	101	137	193	189	240	228	187	201	225	170	132	112	65	96	78	41	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/26/2012	FRI	23	5	3	2	2	11	40	139	159	115	148	180	193	228	261	289	271	299	258	164	110	118	76	55	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/25/2012	THU	14	5	2	2	4	10	46	145	143	124	148	155	207	218	240	312	303	316	233	137	112	104	66	32	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/24/2012	WED	12	4	9	3	5	11	37	151	148	116	115	181	180	232	208	298	293	333	257	144	113	105	80	26	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/23/2012	TUE	9	4	5	1	3	10	50	135	164	149	120	154	166	230	273	279	262	328	249	188	87	92	54	28	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/22/2012	MON	16	3	3	2	4	8	39	136	148	91	135	132	176	235	271	262	303	334	204	134	102	96	61	34	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/21/2012	SUN	34	14	9	4	5	5	18	28	48	158	214	217	221	221	210	206	216	149	140	118	82	67	41	24	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/20/2012	SAT	19	20	11	5	3	7	19	51	109	146	176	207	231	229	214	243	228	175	163	122	88	108	74	55	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	10/19/2012	FRI	16	5	4	4	3	6	41	114	162	130	117	126	192	223	228	431	269	298	233	157	115	105	85	54	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	03/25/2010	THU	16	5	4	4	3	6	41	114	162	130	117	126	192	223	228	431	269	298	233	157	115	105	85	54	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	03/24/2010	WED	12	10	3	2	2	8	36	124	183	133	109	147	163	215	209	267	267	289	258	189	134	108	72	22	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	03/23/2010	TUE	20	5	8	2	3	9	39	133	173	140	126	159	157	160	213	253	269	302	252	205	132	101	69	24	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	03/22/2010	MON	17	8	5	1	1	8	31	126	171	140	135	159	191	171	238	264	285	313	231	170	118	79	49	28	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	03/21/2010	SUN	31	21	17	6	8	3	10	18	44	130	97	146	178	179	189	135	153	153	112	127	98	67	52	21	4	#####	
4	MRN	101	15.4	N	N		NB OFF TO MILLER CRK RD	03/20/2010	SAT	27	16	22																								

Traffic Volumes Counts

						24 hour Period Hourly Counts																													
Dist	Cnty	Rte	Prefix	PM	Leg	Dir	Description	Date	Day	0-1	1-2	2-3	3-4	4-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24hr total	
4	MRN	101		15.7	N	N	NB ON FR MILLER CRK RD	05/08/2001	TUE	6	4	6	1	4	13	46	137	211	159	98	132	131	150	168	242	245	229	180	149	82	81	41	14	#####	
4	MRN	101		15.7	N	N	NB ON FR MILLER CRK RD	05/07/2001	MON	11	3	2	2	6	13	51	136	206	127	127	136	141	151	154	236	244	235	189	116	67	89	37	15	#####	
4	MRN	101		15.7	N	N	NB ON FR MILLER CRK RD	05/06/2001	SUN	19	11	9	5	1	5	14	36	68	98	175	160	169	150	123	148	114	98	97	96	52	25	18	#####		
4	MRN	101		15.7	N	N	NB ON FR MILLER CRK RD	05/05/2001	SAT	23	9	6	1	7	8	22	49	116	166	171	181	173	162	151	136	161	215	119	99	78	62	56	35	#####	
4	MRN	101		15.7	N	N	NB ON FR MILLER CRK RD	05/04/2001	FRI																									#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/17/2013	THU	7	3	2	1	6	27	139	1043	1104	292	164	166	170	190	182	202	189	204	155	96	79	67	47	33	16	#####
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/16/2013	WED	6	3	3	2	7	25	178	1087	1109	180	154	148	174	213	177	231	217	226	162	126	62	60	29	14	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/15/2013	TUE	10	3	7	2	6	25	158	1109	1140	317	154	172	209	157	195	221	212	188	171	119	89	63	25	8	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/14/2013	MON	12	4	3	1	10	24	169	1087	1043	201	149	160	186	187	188	205	200	241	169	120	76	48	20	10	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/13/2013	SUN	17	11	5	2	7	11	15	43	161	161	120	143	180	203	177	197	190	169	122	78	67	28	32	12	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/12/2013	SAT	14	6	3	1	4	14	26	48	100	142	188	176	215	174	208	217	155	96	75	69	76	50	4	#####		
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/11/2013	FRI	11	6	1	2	5	27	101	481	235	167	158	169	173	173	188	250	197	212	150	129	61	58	43	24	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/10/2013	THU	9	3	2	1	5	26	132	1087	1090	221	164	166	170	190	182	202	189	204	155	96	79	47	33	16	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	01/09/2013	WED																										#####
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/26/2010	MON	12	1	1	6	2	19	86	494	378	162	157	145	199	192	179	225	206	224	186	116	83	61	32	20	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/25/2010	SUN	18	10	5	4	10	11	13	34	67	139	136	182	197	191	165	163	200	192	156	114	94	67	34	15	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/24/2010	SAT	10	11	4	8	1	9	36	85	131	139	198	186	194	198	193	191	223	172	120	107	83	80	66	4	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/23/2010	FRI	14	5	5	7	2	19	81	326	246	174	161	180	181	199	211	232	209	203	202	131	116	84	56	26	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/22/2010	THU	9	6	3	5	3	19	127	553	426	169	143	169	193	166	209	254	223	229	174	149	111	76	50	19	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/21/2010	WED	8	1	2	5	1	22	97	657	778	190	132	166	170	233	179	207	190	242	182	134	95	79	32	12	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	04/13/2010	TUE	7	8	4	4	4	27	105	547	636	304	138	172	150	184	205	210	238	245	189	152	93	73	48	16	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/14/2006	THU	7	4	1	5	0	25	363	1358	1387	592	144	156	177	211	191	234	230	201	185	120	88	71	43	23	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/13/2006	WED	8	5	0	5	5	19	415	1387	1321	742	157	172	182	184	202	221	197	253	193	127	79	60	55	26	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/12/2006	TUE	16	7	2	5	5	21	480	1157	1156	1323	681	181	194	149	219	183	191	229	185	93	99	67	46	23	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/11/2006	MON	13	5	2	2	4	25	472	1347	1339	282	135	158	186	161	183	197	224	263	204	105	66	66	40	16	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/10/2006	SUN	22	10	9	5	3	8	9	20	55	126	128	124	158	195	248	143	186	149	134	92	75	58	28	14	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/09/2006	SAT	16	9	8	2	2	10	17	37	90	105	161	173	194	185	189	202	190	164	134	72	73	71	69	32	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/08/2006	FRI	9	4	2	5	7	25	321	1408	474	182	146	185	193	181	226	220	203	251	153	120	89	62	59	4	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/07/2006	THU	1	8	3	5	2	21	461	1457	1332	832	152	174	210	211	191	234	240	201	185	120	88	71	43	23	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	12/06/2006	WED																										#####
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/28/2004	FRI	17	13	7	6	4	21	103	303	239	191	183	177	183	167	218	200	219	214	196	137	94	92	63	47	20	#####
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/27/2004	THU	12	5	1	2	1	17	126	1030	1335	952	291	162	195	171	220	176	225	241	208	123	96	62	50	24	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/26/2004	WED	19	6	4	9	3	26	171	1232	1214	247	141	172	186	174	196	211	190	222	205	134	100	93	38	22	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/25/2004	TUE	12	9	5	7	2	15	109	844	993	234	165	140	175	168	209	211	210	230	202	126	109	81	41	14	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/24/2004	MON	10	8	5	3	2	16	155	1193	1166	180	160	155	160	169	164	227	198	215	184	164	86	66	40	16	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/23/2004	SUN	29	10	14	9	6	11	16	21	46	120	140	140	163	139	209	172	166	134	118	107	74	36	21	#####		
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/22/2004	SAT	22	18	11	2	3	9	16	57	78	136	169	178	199	314	195	180	170	290	184	118	85	58	61	47	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/21/2004	FRI	17	8	2	6	4	21	111	694	326	173	141	194	217	167	218	200	219	214	196	137	94	92	63	47	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/20/2004	THU	21	6	1	11	3	25	139	1248	1415	566	159	144	169	167	196	216	240	220	228	157	91	92	43	21	#####	
4	MRN	101		15.8	F	S	SB OFF TO MILLER CREEK RD	05/19/2004	WED																										#####
4	MRN	101		15.8	F	S																													

101_NB_between LucasValleyOff_LucasValleyOn

Time	9/1/2015	9/2/2015	9/3/2015	9/4/2015	9/8/2015	9/9/2015	9/10/2015	9/11/2015	9/14/2015	9/15/2015	9/16/2015
0:00	710	767	560	834	589	646	696	672	504	884	937
1:00	419	374	338	467	265	354	391	386	291	339	413
2:00	249	238	231	274	211	210	256	242	230	201	217
3:00	203	208	220	239	199	227	224	240	202	187	200
4:00	333	341	344	398	341	311	334	344	336	341	313
5:00	744	764	712	743	747	714	752	758	748	756	735
6:00	1824	1851	1892	1852	1949	1801	1982	1871	1869	1924	1775
7:00	3348	3534	3245	3141	3333	2575	3305	3224	3145	3232	3274
8:00	4104	2513	4106	4094	4161	4276	4035	3984	4003	4119	4237
9:00	3800	3308	3843	4213	3757	3877	3724	4057	3573	3657	3812
10:00	3929	3953	4171	4962	3942	3997	4205	4398	3890	3832	3690
11:00	4305	4385	4762	5748	4355	4249	4505	5202	4320	4389	4177
12:00	4800	5006	5075	6217	4632	4879	5101	5898	4726	4538	4690
13:00	5422	5478	5646	6748	5174	5397	5643	6471	5027	5157	5488
14:00	6445	6281	6633	6597	6399	6339	6631	6993	6082	6382	6372
15:00	6913	6644	6818	6641	6919	6644	6969	6736	6576	7057	6836
16:00	6635	6837	6944	6435	6601	6837	6615	5788	6595	6995	6161
17:00	6534	6537	5302	6361	6081	6537	6318	6469	6220	6652	5282
18:00	5726	6184	5125	5088	5892	6184	5672	5238	5630	5806	4995
19:00	4570	4589	4758	5079	4678	4589	4868	4861	3985	4439	4025
20:00	3586	3794	4060	4426	3418	3794	4130	4237	2546	3491	3151
21:00	2750	3028	2959	3577	2703	3028	3325	3427	2241	2730	2821
22:00	2237	2155	2790	2674	1938	2155	2334	2867	2097	1983	2273
23:00	1631	1697	1512	1868	1151	1697	1408	2350	1587	1360	1639

101_NB_between LucasValleyOff_LucasValleyOn

Time	9/17/2015	9/18/2015	9/21/2015	9/22/2015	9/23/2015	9/24/2015	9/25/2015	9/28/2015	9/29/2015	9/30/2015
0:00	923	807	646	595	636	714	769	637	1008	763
1:00	509	396	417	313	327	346	422	375	471	392
2:00	231	288	248	214	194	273	283	237	201	224
3:00	219	220	214	197	179	222	231	190	193	178
4:00	368	383	340	331	337	335	383	299	317	344
5:00	761	739	757	716	777	765	752	666	753	790
6:00	1858	1909	1900	1887	1831	1888	1894	1708	1910	1787
7:00	3242	3217	3200	3355	3289	3242	3253	2989	3323	3306
8:00	3960	4162	4018	4147	4095	4326	4128	3822	4083	3241
9:00	3749	3945	3679	3825	3748	3982	4010	3458	3768	3048
10:00	3877	4610	3821	3896	3905	4205	4725	3698	3785	3875
11:00	4344	5154	4291	4145	4370	4554	5440	4257	4057	4332
12:00	5004	5787	4620	4609	4846	5139	5969	4499	4603	4764
13:00	5541	6530	5056	5146	5351	5738	6577	4815	5120	5321
14:00	6674	6859	6271	6420	6479	6849	6878	5843	6426	6373
15:00	6990	6912	6890	6989	6910	7077	6846	6495	6843	6811
16:00	6852	6383	6515	6923	6937	6995	6349	6451	6725	7104
17:00	6358	6191	6037	6478	6514	6304	6365	6385	6684	6641
18:00	6126	5704	5393	5892	5853	5928	5399	5703	5771	5789
19:00	4980	5079	4457	4474	4716	4967	5019	4247	4534	4674
20:00	4022	4145	3283	3408	3576	4125	4267	3136	3312	3317
21:00	3487	3484	2532	2741	2822	3341	3511	2607	2742	3129
22:00	2477	2930	1550	2059	2153	2416	2800	1973	2307	2441
23:00	1518	2520	1072	1213	1464	1449	2318	1193	1680	1788

101_NB_between LucasValleyOff_LucasValleyOn

Time	10/1/2015	10/2/2015	10/5/2015	10/6/2015	10/7/2015	10/8/2015	10/9/2015	10/13/2015	10/14/2015	10/15/2015
0:00	820	931	721	637	653	764	807	638	740	654
1:00	433	471	308	364	320	315	401	363	307	383
2:00	276	269	205	216	212	243	264	197	203	224
3:00	219	211	204	199	187	219	222	202	189	203
4:00	342	392	295	337	327	342	374	275	313	366
5:00	785	784	801	759	740	723	727	568	796	793
6:00	1981	1850	1802	1855	1840	1893	1757	1825	1790	1861
7:00	3267	3172	3312	3167	3288	3217	3267	3215	3202	3194
8:00	4188	3540	4001	4110	4125	4201	4112	4171	3990	4064
9:00	3842	3564	3891	3795	3792	3847	4097	3663	3830	3884
10:00	3975	4754	3882	3757	3811	3982	4820	3806	3967	4090
11:00	4276	5162	4275	4107	4285	4611	5335	4336	4307	4471
12:00	5020	5832	4650	4534	4691	4861	5532	4715	4745	5039
13:00	5572	6290	5324	5148	5352	5657	6680	5219	5386	4770
14:00	6634	6846	6292	6569	6717	6699	7092	6067	6551	6609
15:00	7151	7051	6922	7123	7028	7020	6750	6946	7056	6946
16:00	6973	6336	6784	7083	7032	6879	6073	6946	5193	7000
17:00	6597	5977	6648	6440	6725	6374	3710	6461	3850	6345
18:00	5561	6266	5531	5747	5727	5743	3402	5846	4698	5560
19:00	5690	5407	4164	4732	4638	5066	3450	4591	5260	4911
20:00	4071	4490	3100	3418	2827	4064	4171	3430	206	3926
21:00	3486	3572	2404	2720	2302	3451	3493	2855	0	3202
22:00	2346	3039	1649	1989	1514	2387	2882	2098	0	2455
23:00	1504	2244	977	1175	1169	1464	1908	1299	0	1504

101_NB_between LucasValleyOff_LucasValleyOn

Time	10/16/2015	10/19/2015	10/20/2015	10/21/2015	10/22/2015	10/23/2015	10/26/2015	10/27/2015	10/28/2015	10/29/2015
0:00	912	770	656	674	661	827	750	688	653	715
1:00	435	333	373	350	367	451	338	313	309	367
2:00	293	224	252	206	237	244	241	217	186	281
3:00	242	205	220	190	202	204	201	213	204	213
4:00	374	323	312	306	334	368	320	325	332	335
5:00	750	760	680	776	702	737	772	633	727	713
6:00	1915	1938	1876	1759	1789	1774	1825	1882	1807	1867
7:00	3198	3091	3192	3137	3199	3281	3159	3265	3234	3223
8:00	4111	3921	4150	4039	4188	4135	4124	4291	4276	4164
9:00	4063	3756	3821	3884	3880	4098	3665	3757	3775	3728
10:00	4713	3897	3840	3947	4192	4678	3736	3717	3706	3854
11:00	5378	4288	4211	4299	4585	5374	4091	4087	4146	4330
12:00	6023	4616	4687	4789	4960	5917	4453	4505	4520	4980
13:00	6476	4987	5100	5245	5635	6629	5237	5097	5199	5497
14:00	7000	6382	6243	6600	6695	7054	6242	6404	5960	6924
15:00	5312	6945	6710	7241	7163	7232	6920	6991	5420	7071
16:00	4123	6811	6470	6878	6859	6776	6758	6839	6114	6748
17:00	3828	6662	6628	6651	6536	6452	6795	6608	6593	6395
18:00	3503	5462	6264	6069	5690	5623	5577	5845	5743	6157
19:00	3152	4008	4532	4909	4977	4689	4092	4484	4457	5220
20:00	2362	3009	3338	3604	3653	3980	3181	3308	3533	3812
21:00	3065	2550	2778	2999	3093	3282	2446	2681	3008	3241
22:00	2698	1725	1976	2118	2584	2509	1792	1988	2069	2329
23:00	2013	1114	1192	1469	1621	1982	1118	1363	1339	1480

101_NB_between LucasValleyOff_LucasValleyOn

Time	10/30/2015	11/2/2015	11/3/2015	11/4/2015	11/5/2015	11/6/2015	11/9/2015	11/10/2015	11/12/2015	11/13/2015	11/16/2015
0:00	770	567	597	584	614	748	585	630	653	757	845
1:00	389	291	317	328	308	405	340	315	326	410	362
2:00	297	220	189	181	219	275	200	218	237	261	202
3:00	244	168	182	190	209	259	160	176	172	223	186
4:00	299	305	251	323	327	361	315	328	278	369	322
5:00	720	668	585	751	737	693	711	730	692	738	724
6:00	1718	1835	1716	1899	2011	1909	1881	1885	1927	1778	1925
7:00	3186	3053	3205	3341	3377	3205	2962	3185	3257	3224	3115
8:00	3934	3915	4226	4235	4106	4150	3928	4243	4194	4009	3533
9:00	3948	3510	3753	3874	3792	4022	3465	3771	3818	4038	3690
10:00	4253	3531	3821	3854	4109	4479	3643	3670	4059	4385	3797
11:00	4956	4025	4219	4214	4507	5130	4058	4242	4513	4976	4171
12:00	5644	4300	4513	4770	4889	5680	4260	4528	4995	5733	4590
13:00	6087	4963	5151	5350	5534	6281	4819	5361	5378	6454	5049
14:00	7043	6076	6559	6687	6856	7182	6040	6609	6777	7105	6277
15:00	6880	6879	7147	7285	7330	7080	6823	7283	7207	6840	7114
16:00	6409	6304	6593	6748	6861	6296	6717	6969	6919	6476	6761
17:00	6122	6230	6608	6289	6663	6270	6355	6757	6377	6340	6629
18:00	5308	5431	5711	5922	5854	5748	4974	5806	5630	5620	5559
19:00	4805	3679	4564	4763	4645	5151	3678	4767	4428	4715	3993
20:00	3720	2761	3180	3396	3585	3959	2814	3462	3856	3780	3016
21:00	3123	2361	2654	2766	3042	3409	2330	2896	3370	3221	2443
22:00	2510	1824	2060	2134	2215	2949	1695	2055	2236	2575	1783
23:00	1799	1127	1185	1505	1341	1850	1112	1352	1489	1822	1104

101_NB_between LucasValleyOff_LucasValleyOn

Time	11/17/2015	11/18/2015	11/19/2015	11/20/2015	11/23/2015	11/24/2015	11/25/2015	11/27/2015	11/30/2015
0:00	564	659	727	751	669	576	791	805	620
1:00	305	273	378	455	326	333	401	501	399
2:00	214	232	215	254	228	224	283	271	264
3:00	217	190	221	257	183	217	238	228	203
4:00	315	333	359	367	346	360	345	283	330
5:00	710	708	734	742	736	635	748	434	726
6:00	1885	1792	1933	1795	1772	1710	1698	950	1650
7:00	3270	3316	3300	3332	2940	2759	2839	1527	3186
8:00	4274	1884	3966	4184	4108	3951	3500	2273	3801
9:00	3688	3820	3980	3943	3761	3841	4075	3566	3543
10:00	3807	3525	4044	4413	4055	4160	5066	5108	3758
11:00	4015	4305	4416	5074	4525	4491	5884	5915	3970
12:00	4586	4856	5000	5582	5003	5041	6451	5241	4288
13:00	5110	5318	5501	6129	5002	5517	6796	5391	5159
14:00	4453	6528	6800	6875	6216	6706	6754	5452	6078
15:00	6849	7046	6969	7162	6607	6987	7150	5233	6913
16:00	7156	6893	6805	6162	6538	6780	5649	5091	6410
17:00	6563	6433	6402	6070	6157	6516	6234	5006	6455
18:00	6135	5423	5729	5295	5458	5670	5033	4354	4818
19:00	4480	4689	4786	4729	4472	4587	4180	2900	3711
20:00	3461	3617	3636	3458	2842	3574	3794	2528	2870
21:00	2640	2936	3245	3159	1972	2962	2992	2645	2450
22:00	2286	2121	2365	2664	1593	2200	2172	2324	1624
23:00	1330	1342	1472	1839	1071	1493	1802	1535	967

101_NB_between LucasValleyOff_LucasValleyOn

Time	# Lane Points	% Observed
0:00	2928	89
1:00	2928	90
2:00	2928	90
3:00	2928	90
4:00	2928	90
5:00	2928	92
6:00	2928	93
7:00	2928	93
8:00	2928	93
9:00	2928	93
10:00	2928	93
11:00	2928	93
12:00	2928	93
13:00	2928	91
14:00	2928	90
15:00	2928	90
16:00	2928	91
17:00	2928	91
18:00	2928	90
19:00	2928	90
20:00	2928	90
21:00	2928	90
22:00	2928	90
23:00	2928	89

101_SB_between LucasValley-ManuelFreitas

Time	9/1/2015	9/2/2015	9/3/2015	9/4/2015	9/8/2015	9/9/2015	9/10/2015	9/11/2015	9/14/2015	9/15/2015	9/16/2015	9/17/2015
0:00	377	402	342	387	471	333	341	412	354	354	374	346
1:00	292	305	312	329	296	265	284	338	261	254	306	318
2:00	285	287	260	288	299	286	265	310	286	268	285	246
3:00	517	541	485	529	562	540	497	542	567	505	519	511
4:00	1332	1355	1391	1168	1398	1369	1331	1315	1387	1391	1436	1387
5:00	4081	3953	3954	3145	4342	4064	3813	3694	3949	4052	4031	4061
6:00	6699	6822	6713	5972	6822	6683	6756	6670	6531	6745	6620	6652
7:00	6366	6399	6508	6663	6188	4500	6178	6667	6268	6425	6593	6143
8:00	6539	3890	6086	6064	6164	6083	5909	6369	5741	6421	6302	6248
9:00	6553	5606	6571	5616	6552	6731	6640	5649	6629	6841	6550	6452
10:00	5823	6293	6154	5579	6346	6278	6237	5699	5772	5916	6051	6307
11:00	5467	5643	5642	5566	5742	5563	5544	5786	5451	5535	5554	5443
12:00	5430	5440	5356	5129	5460	5327	5245	5529	5151	5109	5334	5313
13:00	5234	5240	5369	5531	5363	5201	5200	5432	5219	5284	5360	5186
14:00	5246	5306	5372	5747	5200	5345	5136	5627	5355	5197	5294	5500
15:00	5527	5503	5443	5712	5537	5503	5670	5404	5543	5604	5395	5557
16:00	5749	5767	5505	5368	5438	5767	5608	4166	5466	5657	5316	5817
17:00	5816	6066	5149	5114	5512	6066	5788	5875	5605	5941	4367	5968
18:00	4761	4812	4078	4078	4549	4812	4740	5871	4351	4636	4098	4797
19:00	3293	3429	3350	3426	3215	3429	3302	3697	3002	3114	2602	3442
20:00	2461	2626	2650	2568	2276	2626	2626	2708	1690	2300	1873	2555
21:00	1863	2031	1896	1989	1862	2031	1992	2046	1609	1697	1552	1899
22:00	1285	1312	1263	1633	1127	1312	1241	1751	1138	1130	1060	1339
23:00	668	684	691	1006	623	684	722	1045	615	584	625	744

101_SB_between LucasValley-ManuelFreitas

Time	9/18/2015	9/21/2015	9/22/2015	9/23/2015	9/24/2015	9/25/2015	9/28/2015	9/29/2015	9/30/2015	10/1/2015	10/2/2015	10/5/2015
0:00	371	428	334	359	373	393	442	336	350	348	405	368
1:00	297	292	289	290	286	329	306	258	275	263	314	261
2:00	312	308	273	263	268	313	314	267	290	263	327	286
3:00	602	559	500	524	496	544	535	539	557	569	554	578
4:00	1293	1448	1438	1369	1366	1287	1288	1418	1377	1394	1341	1463
5:00	3601	4110	4130	3894	3840	3548	3789	4178	4113	4197	3762	4299
6:00	6550	5838	6470	6676	6423	6437	5539	6968	6970	6710	6568	6760
7:00	6748	5546	6343	6294	5782	6741	5464	6296	6519	6339	6695	6485
8:00	6504	6288	6088	6224	5717	6412	5704	5722	4815	6410	5223	5838
9:00	5815	6746	6855	6693	5924	5760	6455	6548	5261	5992	5369	6754
10:00	5720	6245	5874	5856	6008	5666	5934	5668	5659	6291	5852	5518
11:00	5786	5488	5400	5332	5472	5712	5643	5336	5514	5791	5799	5383
12:00	5495	5320	5180	5217	5473	5397	5412	5068	5292	2976	5286	5178
13:00	5463	5003	4998	5349	5280	5489	5263	5174	5306	5743	5573	5066
14:00	5839	5093	5095	5300	5551	5705	5410	5208	5363	5472	5718	5159
15:00	6069	5266	5501	5406	5568	5893	5528	5614	5576	5724	5953	5479
16:00	6221	5289	5548	5557	5659	5629	5548	5676	5830	5649	5931	5288
17:00	6095	5071	5643	5925	5947	5743	5702	5955	6151	5859	5788	5358
18:00	5044	4366	4687	4808	4741	4992	4510	4745	4885	4899	4909	4499
19:00	3656	3120	3352	3232	3365	3569	3235	3173	3224	3507	3718	3078
20:00	2673	2198	2089	2352	2608	2621	2063	2108	2205	2295	2557	2001
21:00	2002	1689	1639	1882	1985	2030	1654	1716	1733	1838	2039	1690
22:00	1668	896	1103	1235	1304	1681	1030	1066	1205	1314	1797	1046
23:00	1011	582	626	654	721	1025	574	560	626	819	997	468

101_SB_between LucasValley-ManuelFreitas

Time	10/6/2015	10/7/2015	10/8/2015	10/9/2015	10/13/2015	10/14/2015	10/15/2015	10/16/2015	10/19/2015	10/20/2015	10/21/2015
0:00	292	342	353	397	345	298	283	384	375	273	328
1:00	297	296	272	316	269	281	308	360	300	277	297
2:00	257	261	294	313	260	267	268	324	313	270	253
3:00	520	551	553	550	538	557	535	587	597	534	556
4:00	1396	1397	1424	1319	1035	1432	1408	1308	1428	1407	1362
5:00	4211	4068	4197	3705	3106	4176	4103	3800	4237	4345	4177
6:00	6414	6759	6870	6545	6916	6809	6745	6622	6701	6925	6631
7:00	5808	6383	6478	6638	6417	6467	6298	6665	6200	6282	6003
8:00	6141	6416	6181	6343	5628	5774	6070	6145	6398	6106	5752
9:00	7199	6485	6676	5785	6758	6758	6869	5622	6019	6677	6870
10:00	5968	5828	6083	6050	6234	5768	6081	5544	5695	5762	6057
11:00	5365	5435	5625	5905	5436	5680	5702	5451	5344	5258	5472
12:00	5075	5378	5227	5687	5410	5444	5435	5273	4860	5166	5311
13:00	5075	5184	5238	5581	5166	5294	4455	5303	5421	5050	5412
14:00	5109	5269	5420	5709	5219	5219	5625	5571	5170	4929	5212
15:00	5292	5588	5616	5906	5476	5450	5538	4416	5456	5571	5579
16:00	5438	5693	5689	5237	5366	4140	5827	3587	5427	5375	5526
17:00	5554	5744	5927	3344	5723	3614	6026	3511	5378	5510	5953
18:00	4746	4827	4808	2998	4676	3591	4839	2961	4638	4755	4894
19:00	3163	3174	3391	2487	3120	3276	3287	2282	3041	3157	3260
20:00	2054	1677	2451	2624	2079	126	2162	1399	2010	2009	2190
21:00	1702	1393	1879	2054	1727	0	1851	1832	1662	1712	1939
22:00	1076	898	1288	1599	1077	0	1257	1678	939	1049	1126
23:00	586	512	781	1000	581	0	631	1011	525	592	603

101_SB_between LucasValley-ManuelFreitas

Time	10/22/2015	10/23/2015	10/26/2015	10/27/2015	10/28/2015	10/29/2015	10/30/2015	11/2/2015	11/3/2015	11/4/2015	11/5/2015
0:00	320	363	399	296	312	329	349	308	302	294	268
1:00	292	341	258	255	256	266	310	266	255	241	248
2:00	283	298	292	240	242	250	272	273	249	280	231
3:00	498	570	596	470	455	525	538	524	545	497	490
4:00	1448	1358	1444	1380	1383	1407	1274	1449	1114	1374	1435
5:00	4147	3818	4244	3633	4245	4172	3913	4107	3612	4348	4211
6:00	6669	6537	6577	6913	6967	6790	6684	3515	6210	7055	7045
7:00	6341	6618	6247	6300	6325	6304	6715	4552	5902	6072	6305
8:00	6041	6421	5840	6229	5959	5350	5914	5735	6077	6174	6233
9:00	6386	5568	6080	6752	6463	3913	5739	6597	6876	6940	6730
10:00	6388	5409	5999	5691	5667	6318	5702	6341	5744	5694	6031
11:00	5735	5557	5304	5362	5393	6098	5498	5055	5147	5485	5632
12:00	5362	5574	5294	5142	5245	5512	5242	4947	5009	5337	5374
13:00	5524	5461	5234	4985	5267	5380	5467	4973	5044	5335	5281
14:00	5519	5344	5253	5141	4827	5426	5551	5031	5101	5243	5547
15:00	5861	5975	5277	5619	3978	5666	5633	5248	5546	5598	5557
16:00	5837	5944	5377	5710	4893	5790	5855	5288	5439	5871	5860
17:00	6006	6007	5380	5682	5718	5777	5819	5474	5651	5849	5796
18:00	4866	4933	4588	4563	4768	5074	4912	4261	4429	4460	4566
19:00	3244	3757	2982	2916	3154	3424	3658	2593	2812	2797	2917
20:00	2204	2402	1956	1990	2144	2165	2559	1831	1968	2066	2125
21:00	1769	2151	1642	1613	1792	1822	2031	1521	1593	1690	1763
22:00	1210	1541	940	1004	1040	1195	1652	915	1009	979	1068
23:00	657	947	521	561	551	648	1064	486	549	592	624

101_SB_between LucasValley-ManuelFreitas

Time	11/6/2015	11/9/2015	11/10/2015	11/12/2015	11/13/2015	11/16/2015	11/17/2015	11/18/2015	11/19/2015	11/20/2015	11/23/2015
0:00	346	391	256	367	352	374	308	331	351	383	408
1:00	254	231	222	282	299	290	230	264	261	321	291
2:00	270	281	216	241	284	258	269	252	268	282	317
3:00	547	558	536	441	505	560	505	544	564	566	553
4:00	1354	1384	1377	1211	1301	1401	1426	1372	1439	1367	1452
5:00	3929	4414	4280	3807	3984	4462	4388	4290	4234	4034	4222
6:00	6704	6412	7061	6947	6803	6999	6990	7055	6893	6686	6687
7:00	6616	4922	6169	6419	6588	6194	6333	6276	6193	6487	6398
8:00	6190	5299	5976	5918	4975	6206	6183	2796	6048	5932	6103
9:00	5772	6205	6723	6815	6136	6363	6739	6116	6648	6197	6433
10:00	5613	5593	6003	6257	5663	5455	5383	5711	6350	5857	6003
11:00	5479	5096	5408	5662	5641	5221	5430	5537	5573	5507	5836
12:00	5461	4971	5321	5401	5395	4990	5042	5414	5481	5551	5638
13:00	5272	4848	5110	5317	5599	5139	5066	5485	5210	5686	5447
14:00	5554	5008	5399	5397	5737	5114	5282	5467	5576	5783	5643
15:00	5921	5022	5604	5725	6312	5372	5284	5486	5685	5908	5492
16:00	5965	5227	5568	5861	6002	5255	5455	5821	6030	6125	5622
17:00	5957	5351	5490	6032	5822	5458	5783	6017	5794	5925	5418
18:00	4946	4197	4774	4686	4718	4228	4360	4838	4737	4854	4448
19:00	3382	2688	2912	3036	3381	2712	2787	3280	3084	3462	2958
20:00	2240	1864	1937	2245	2293	1921	1958	2499	2135	2417	2028
21:00	2081	1369	1708	1655	1974	1490	1595	1986	1737	2050	1478
22:00	1528	782	1108	1131	1501	954	1124	1227	1184	1694	940
23:00	799	487	600	568	895	557	519	572	646	968	566

101_SB_between LucasValley-ManuelFreitas

Time	11/24/2015	11/25/2015	11/27/2015	11/30/2015	# Lane Points	% Observed
0:00	342	414	829	377	2928	89
1:00	270	318	537	286	2928	90
2:00	265	316	441	300	2928	90
3:00	568	609	506	536	2928	90
4:00	1401	1428	777	1447	2928	90
5:00	4040	3630	1526	4464	2928	92
6:00	6838	5974	2440	6733	2928	93
7:00	6537	5503	2799	6543	2928	93
8:00	5224	5770	3498	6569	2928	93
9:00	5210	5490	4478	5501	2928	93
10:00	5837	6001	5423	5511	2928	93
11:00	6277	6089	5951	5229	2928	93
12:00	5622	5789	5779	5232	2928	93
13:00	5733	5726	5797	5048	2928	91
14:00	5771	5507	5788	5061	2928	90
15:00	5493	5667	5838	5295	2928	90
16:00	5793	5502	6084	5375	2928	91
17:00	5609	4964	5836	5260	2928	91
18:00	4660	3914	4690	4003	2928	90
19:00	3330	2991	3029	2825	2928	90
20:00	2245	2328	2163	1832	2928	90
21:00	1862	1849	2238	1546	2928	90
22:00	1265	1370	1658	952	2928	90
23:00	685	784	1035	570	2928	89