

## **APPENDICES**

Appendix B: Notice of Preparation and Comment Letters



## NOTICE OF PREPARATION

**Date of Mailing:** June 25, 2013

**TO:** Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 212  
Sacramento, CA 95814

**FROM:** City of San Rafael  
Community Development Department  
P.O. Box 151560  
San Rafael, CA 94915-1560  
Attn.: Lisa Newman,  
Newman Planning Associates

Responsible and Trustee Agencies,  
Utility Providers,  
Organizations,  
Neighboring Property Owners/Occupants  
Interested Parties

### **SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR)**

The City of San Rafael will be the lead agency and will prepare an environmental impact report (EIR) for a proposed new mixed-use housing project at the northwest corner of 2<sup>nd</sup> and B Streets in San Rafael. This Notice of Preparation is sent pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines to announce the initiation of the EIR process and to solicit comments from responsible and trustee agencies, utility providers, organizations, neighboring property owners, and interested parties concerning the scope of issues to be addressed in the EIR. Refer to the Probable Environmental Effects listed below to determine whether your concerns have already been identified. Please focus your comments on the project's potential environmental impacts and recommendations for methods to avoid, reduce or otherwise mitigate those impacts. If you are a governmental agency with discretionary authority over initial or subsequent aspects of this project, describe that authority and provide comments regarding potential environmental effects that are germane to your agency's area of responsibility.

**Project Title:** Second and B Street: New San Rafael Housing

**Project Location:** 815 B Street (formerly 809 B Street, 1212 Second Street and 1214 Second Street), San Rafael, Marin County, California, APNs: 011-256-12, 011-256-32, 011-256-14, 011-256-15.

**Project Setting:** The subject property consists of four adjacent parcels, totaling approximately 0.53 acres in size, located in Downtown San Rafael. The parcels are currently developed with a single-story, approximately 5,000 square foot commercial building, a commercial parking lot with 45 parking spaces and two, two-story Victorian-era residences, located at 1212 and 1214 Second Street that date to the 1890s, one of which is a known local cultural resource listed on the San Rafael Historical/Architectural

Survey (dated 1976; updated 1986) and is currently uninhabitable due to fire damage. The subject property has little vegetation and is relatively flat.

The project site also contains five trees: two Carob trees are located at the entrance to the parking lot, a Canary Island Date Palm is located on the north property line, and two Ash trees are located along Second Street. The development plan proposes to remove all five existing trees. (Refer to Figure 1, Regional Location Map and Figure 2, Project Vicinity Map)

**Project Description:** The Second and B Street: New San Rafael Housing project is a mixed-use development located at the northwest corner of Second and B Streets in Downtown San Rafael. The proposed 74,435 square foot building would occupy the entire site and consist of a three-story, wood-frame residential complex over a one-story concrete podium that contains required parking, building lobby, and a retail space. 41 rental apartment units are proposed on the three upper floors consisting of two types: 1) 11 1-bedroom/1-bath units (approximately 800 square feet in area) and 2) 30 2-bedroom/2-bathroom units (ranging from 899 - 1,090 square feet in area). The residential units surround a central courtyard with each unit also providing a balcony (facing either 2<sup>nd</sup> or B Street or an interior patio). Three of the residential units are proposed without a balcony or patio. The total area of the residential units is 54,055 square feet. The ground floor podium would provide a 20,317 square foot parking garage for 49 cars and 2,090 square feet of retail space.

The landscape design for the 815 B Street project consists of 3 main areas: the streetscape plantings, the infiltration planters, and the podium level courtyard. The streetscape planting provides six new Crimson Spire Oak trees along Second Street. At B Street, two existing Flowering Pear trees would remain and be augmented by two new Flowering Pear Trees. The infiltration zones are planting areas located at the street level along 2nd Street and also on the north side of property on the 2nd level podium. The function of the infiltration planters is to treat storm water run-off from the building roof, which will be collected by gutters and routed to the planters via down leaders. The internal courtyard of the building is located on the 2nd level podium. The courtyard is not visible from the street and would offer a private, comfortable outdoor common space for residents. Other miscellaneous site landscape items include the replacement of the declining Canary Island Palm with a new, younger Canary Island Palm in the same location. Refer to Figure 3, Project Site Plan.

Development of the project involves the demolition of the existing structures on the property. Based upon the 2013 Historic Resource Report prepared by Painter Preservation and Planning, the two Victorian residential structures are historic resources and the proposed demolition would result in a significant adverse impact under the California Environmental Quality Act (CEQA). The Initial Study concludes that the project also could have an adverse effect on immediately adjacent historic properties.

**Probable Environmental Effects:** The purpose of the EIR is to provide full disclosure, in advance, of the potential environmental impacts that would result from implementation of the proposed project. The EIR will analyze the extent to which the project design and alternatives would result in significant environmental impacts and will identify appropriate project modifications or mitigation measures to reduce or eliminate these impacts. Issues that will be examined include the following:

- Aesthetics – Impact to scenic resources or visual character or quality of the site and its surroundings due to the proposed design of the new building in relation to adjacent historic properties.
- Cultural Resources - Impact to historic resources due to the proposed demolition of two historic structures.

**Scoping:** The City invites written comments on the scope of the EIR and alternatives that should be considered. Due to the time limits mandated by state law, your response must be sent at the earliest possible date, **but no later than 30 days from the date of this notice**. Written comments should be sent to Lisa Newman, Contract Planner, at the mailing address above by **5 p.m. on Thursday, July 25, 2013**.

Comments should focus on identifying specific environmental impacts to be evaluated during the EIR process and suggesting project modifications or alternatives that would be less environmentally damaging while achieving similar project objectives. Scoping comments should focus on issues and alternatives to be studied, not on expressing a preference for a particular alternative.

The City will also hold a public scoping meeting before the City of San Rafael Planning Commission on **Tuesday, July 23, 2013, at 7:00 p.m.** in the San Rafael City Council Chambers, 1400 Fifth Avenue, San Rafael, CA. The building used for the scoping meeting is accessible to persons with disabilities.

If you wish to be placed on a mailing list to receive further information as the project progresses, please contact Steve Stafford at (415) 458-5048, [steve.stafford@cityofsanrafael.org](mailto:steve.stafford@cityofsanrafael.org) or the mailing address above.

Date: June 25, 2013 Signature: \_\_\_\_\_  
Name/Title: Paul Jensen, *Community Development Director*

Reference: California Code of Regulations, Title 14, (State CEQA Guidelines) Sections 15082(A), 15103, 15375

*Sign Language and interpretation and assistive listening devices may be requested by calling (415) 485-3085 (voice) or (415) 485-3198 (TDD) at least 72 hours in advance. Copies of documents are available in accessible formats upon request.*

*Public transportation to City Hall is available through Golden Gate Transit, Line 22 or 23. Para-transit is available by calling Whistlestop Wheels at (415) 454-0964.*

*To allow individuals with environmental illness or multiple chemical sensitivity to attend the meeting/hearing, individuals are requested to refrain from wearing scented products.*



## **Notes from PC Scoping Session – July 23, 2013**

### Public Hearing Comments:

1. Hugo Landekker, SR Heritage Commission
  - a. Demolition of Victorians will leave impact on neighborhood between Lincoln & Mission
  - b. Study parking impact on north end of Gerstle Park neighborhood from project overflow parking (tenants' extra vehicles)
2. Bill Calaghan, Owner across 2<sup>nd</sup> St.
  - a. Historic buildings are treasures that need to be preserved; they are fine examples of heritage that can be put to work. Good for the City to preserve them.
3. Steven Schoonover, Gerstle Park resident
  - a. Project design clashes greatly with historic neighborhood and needs more study.
  - b. Prefers the first Alternative in staff report to save Victorians; they brighten his day.
  - c. Agrees there is need to study parking impacts at north end of Gerstle Park.
4. Roger Roberts
  - a. Prefers Alternative 1 to save Victorians; lots of benefits with a smaller project.
  - b. There is a big problem with scale/mass of project design; out of scale and character with B Street corridor.
  - c. EIR should consider whether there is a General Plan issues regarding impacts on neighborhood character
5. Kristine Strand
  - a. The project is out of scale and context for neighborhood and destroys two treasures.
  - b. Agrees with previous speaker.
6. Michelle Dougherty
  - a. Believes the proposed design is ugly.
  - b. Wants to see Victorians preserved; they teach us about the past.

### Planning Commission Comments:

#### Questions:

1. Palm Tree health?
2. Alternatives can be open to design ideas?
3. How stable is the burned Victorian if relocation is proposed?

Comments:

1. Schaeffer:

- a. Tension between need for housing and historical preservation. Wants to see if there is a way to marry the two?
- b. Parking impact is a concern at north end of Gerstle Park
- c. Need to study traffic impact given number of housing units?
- d. These issues should not be impediment to site development.

2. Pick:

- a. EIR must make clear distinction between loss of Victorians and the Aesthetic issue of the project design's impact on historic neighborhood. Need to evaluate these issues separately. Concerned about unduly limiting design. EIR should inform Design Review process.
- b. Cumulative impact seems quite abstract as there has been 60 years of change on this parcel. Agrees that building design should be careful fit into neighborhood but language in EIR needs to be respectful.
- b. Victorians' characteristics should be looked at. Are they intact or not? What would it take to preserve them?

3. Wise:

- a. Seen many iterations of project. Need Downtown housing; exciting infill project on a challenging site. Victorians and historic context: appropriate that design is boxed-in by setting. Could we create an historic district?
- b. Agree with finding that there are significant adverse impacts upon Aesthetics, Cultural resources and Cumulative impacts. This should inform mitigation measures and Alternatives.
- b. Alternative 1: Reduced Project + Preserve Victorians. Preservation should be incorporated into project (i.e., the character defining features) as in adaptive re-use.
- c. Alternative 2: Moving the Victorians. Study the feasibility and financial viability. Thinks this will be "considered but rejected".
- d. Alternative 3: Aesthetics = reduced massing.
- e. Be cautious with Project Sponsors objectives. Must be broadly worded.
- f. Mitigation Measures for Cumulative impact: look at funding to explore/create Historic district.

4. Lub *Lub*

- a. Agrees with Pick. Important location between Gerstle Park & Downtown
- b. Commercial use & residential mixed use are good.
- c. Can't support destroying the Victorians; prefers offsite relocation of structures
- d. Project appears too large from street; some character changes needed to draw from historical context; it is a disservice to this site.
- e. Parking - where are extra cars going to park?
- f. Great opportunity to create best project; we can do better than this.

5. Robertson

- a. Thinks Initial Study has identified the appropriate issues to study in EIR
- b. Huge opportunity to develop at this key intersection; site is highly visible, need an injection; it will be a big improvement to area.
- c. Study loss of existing parking on site?
- d. Believes that contemporary architecture can fit in with historic structures so look at local/regional examples. Don't have to mimic Victorian architecture but with changes to massing and setbacks, project can be made to fit in.

6. Wise

- a. Want to add that she would hate to see demolition of Victorians; just thinks incorporation is probably more feasible than relocation.



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

Notice of Preparation

June 24, 2013

To: Reviewing Agencies  
Re: Second and B Streets: New San Rafael Housing  
SCH# 2013062053

Attached for your review and comment is the Notice of Preparation (NOP) for the Second and B Streets: New San Rafael Housing draft Environmental Impact Report (EIR).

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

Please direct your comments to:

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

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

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

Sincerely,

Scott Morgan  
Director, State Clearinghouse

RECEIVED

JUN 28 2013

Attachments  
cc: Lead Agency

COMMUNITY DEVELOPMENT  
CITY OF SAN RAFAEL



**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2013062053  
**Project Title** Second and B Streets: New San Rafael Housing  
**Lead Agency** San Rafael, City of

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**Type** **NOP** Notice of Preparation  
**Description** New, four-story, mixed-use, housing project, proposing 41 'rental' residential units above 2,095 sf of ground-floor commercial space and 49 garage parking spaces.

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**Lead Agency Contact**

**Name** Lisa Newman  
**Agency** City of San Rafael  
**Phone** 415 492 0300 **Fax**  
**email**  
**Address** P.O. Box 15160  
1400 Fifth Avenue  
**City** San Rafael **State** CA **Zip** 94915-1560

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**Project Location**

**County** Marin  
**City** San Rafael  
**Region**  
**Cross Streets** Second Street and B Street  
**Lat / Long**  
**Parcel No.** 011-256-12, -32, -14, -15  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** Hwy 101  
**Airports** No  
**Railways** SMART  
**Waterways** San Rafael Canal  
**Schools** Davidson; Sun Valley; SRSH  
**Land Use**

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**Project Issues** Aesthetic/Visual; Archaeologic-Historic

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

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**Date Received** 06/24/2013 **Start of Review** 06/24/2013 **End of Review** 07/23/2013



**DEPARTMENT OF TRANSPORTATION**

111 GRAND AVENUE  
OAKLAND, CA 94612  
PHONE (510) 286-6053  
FAX (510) 286-5559  
TTY 771



*Flex your power!  
Be energy efficient!*

June 26, 2013

MRN101437  
MRN-101-10.901  
SCH#2013062053

Ms. Lisa Newman  
Community Development Department  
City of San Rafael  
P.O Box 15160  
1400 Fifth Avenue  
San Rafael, CA 94915-1560

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JUL - 3 2013

COMMUNITY DEVELOPMENT  
CITY OF SAN RAFAEL

Dear Ms. Newman

**Second and B Street: New San Rafael Housing – Notice of Preparation**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. We have reviewed the Notice of Preparation and have the following comments to offer.

***Traffic Impact Study (TIS)***

One of Caltrans' ongoing responsibilities is to collaborate with local agencies to avoid, eliminate, or reduce to insignificance potential adverse impacts by local development on State highways. US 101 is a critical route for regional and interregional traffic in Marin County. Please consider in your mitigation measures ways to reduce the impacts your project may have on US 101. We are particularly concerned about how your project will impact US off ramps at Hetherton Street Northbound off ramp and Irwin Street Southbound off ramp.

We recommend using the Caltrans *Guide for the Preparation of Traffic Impact Studies (TIS Guide)* for determining which scenarios and methodologies to use in the analysis. The TIS Guide is a starting point for collaboration between the lead agency and Caltrans in determining when a TIS is needed. The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic. The TIS Guide is available at the following website address: [http://dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf).

The TIS should include:

1. Vicinity map, regional location map, and a site plan clearly showing project access in relation to nearby State roadways. Ingress and egress for all project components should be clearly identified. The State right-of-way (ROW) should be clearly identified. The maps should also include project driveways, local roads and intersections, parking, and transit facilities.
2. Project-related trip generation, distribution, and assignment. The assumptions and methodologies

used to develop this information should be detailed in the study, and should be supported with appropriate documentation.

3. Average Daily Traffic, AM and PM peak hour volumes and levels of service (LOS) on all roadways where potentially significant impacts may occur, including crossroads and controlled intersections for existing, existing plus project, cumulative and cumulative plus project scenarios. Calculation of cumulative traffic volumes should consider all traffic-generating developments, both existing and future, that would affect study area roadways and intersections. The analysis should clearly identify the project's contribution to area traffic and any degradation to existing and cumulative LOS. Caltrans' LOS threshold, which is the transition between LOS C and D, and is explained in detail in the TIS Guide, should be applied to all State facilities.
4. Schematic illustration of traffic conditions including the project site and study area roadways, trip distribution percentages and volumes as well as intersection geometrics, i.e., lane configurations, for the scenarios described above.
5. The project site building potential as identified in the General Plan. The project's consistency with both the Circulation Element of the General Plan and the Congestion Management Agency's Congestion Management Plan should be evaluated.
6. Identification of mitigation for any roadway mainline section or intersection with insufficient capacity to maintain an acceptable LOS with the addition of project-related and/or cumulative traffic. As noted above, the project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should also be fully discussed for all proposed mitigation measures.

#### ***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.

This information should also be presented in the Mitigation Monitoring and Reporting Plan of the environmental document. Required roadway improvements should be completed prior to issuance of the Certificate of Occupancy. Since an encroachment permit is required for work in the State ROW, and Caltrans will not issue a permit until our concerns are adequately addressed, we strongly recommend that the City work with both the applicant and Caltrans to ensure that our concerns are resolved during the environmental process, and in any case prior to submittal of an encroachment permit application. Further comments will be provided during the encroachment permit process; see end of this letter for more information regarding encroachment permits.

#### ***Vehicle Trip Reduction***

Caltrans encourages you to locate any needed housing, jobs and neighborhood services near major mass transit centers, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the State highways.



Ms. Lisa Newman, City of San Rafael

June 26, 2013

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We also encourage you to develop Travel Demand Management (TDM) policies to encourage usage of nearby public transit lines and reduce vehicle trips on the State Highway System. These policies could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others. For information about parking ratios, see the Metropolitan Transportation Commission (MTC) report *Reforming Parking Policies to Support Smart Growth* or visit the MTC parking webpage: [http://www.mtc.ca.gov/planning/smart\\_growth/parking](http://www.mtc.ca.gov/planning/smart_growth/parking).

In addition, secondary impacts on pedestrians and bicyclists resulting from any traffic impact mitigation measures should be analyzed. The analysis should describe any pedestrian and bicycle mitigation measures and safety countermeasures that would in turn be needed as a means of maintaining and improving access to transit facilities and reducing vehicle trips and traffic impacts on State highways.

#### ***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the address below. 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 linked below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Should you have any questions regarding this letter, please contact Keith Wayne of my staff by telephone at (510) 286-5737, or by email at [Keith\\_Wayne@dot.ca.gov](mailto:Keith_Wayne@dot.ca.gov).

Sincerely,



ERIK ALM, AICP  
District Branch Chief  
Local Development – Intergovernmental Review

c: Scott Morgan, State Clearinghouse

## Steve Stafford

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**From:** Hugo & Cynthia Landecker <clandecker@saber.net>  
**Sent:** Monday, July 22, 2013 8:32 PM  
**To:** lisapnewman@gmail.com; Paul Jensen; Steve Stafford  
**Cc:** Amy Likover; Ross Parmentor; Gina Silvestri; Tamalpais Natureworks; Sunrise Home; Sans Gluten; I  
**Subject:** Second and B Street: New San Rafael Housing

Here are my comments for inclusion into the EIR for the 815 B St project:

There has been considerable discussion about vehicle ingress/egress as this project has evolved. I suggest that any changes to the project retain the proposed B Street ingress/egress.

Although the proposed B Street facade has been changed a number of times, it needs to enhance the historical architecture that exists on B Street and not detract from it. The currently proposed facade does detract from the historical architecture of the neighborhood due to mass and details. There are hopes that this part of B Street will eventually become a Historic District.

I would like to see the upper story of the building as seen from B Street stepped back to reduce the mass of the structure.

Preservation of Historic Resources is encouraged by CEQA and San Rafael General Plan 2020. The current proposal provides for demolition of both of the existing Victorian homes on the site. One of these buildings is listed on the San Rafael list of historically and architecturally significant buildings and needs to be preserved and restored. I propose moving this structure to the west end of the site.

In recent years we have seen a number of historic resources demolished in favor of development. This trend has to cease.

It should be noted that the Initial Study states that the proposed project will have a "significant adverse impact upon the surrounding historic structures and setting".

Hugo Landecker  
Head of San Rafael Heritage

## Steve Stafford

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**From:** Roger Roberts <rer.dlr@comcast.net>  
**Sent:** Monday, July 22, 2013 5:45 PM  
**To:** Paul Jensen  
**Cc:** Tymber Cavasian; Cynthia Landecker; Amy Likover; Lisa Newman; Steve Stafford; Raffi Boloyan; Sustainable San Rafael  
**Subject:** Re: EIR Scoping for 2d & B Streets Proposed Project , San Rafael

Hello again, Paul. Thanks for your reply. With respect to CEQA; I understand that an EIR does not have to study all possible alternatives, and that the alternatives in addition to the No Project Alternative should be ones that are reasonably consistent with project objectives .

I would argue that what I have proposed as an Alternative is reasonably consistent with the general objectives of the project and can also potentially provide the City with an Environmentally Superior Alternative if for no other reason than it should result in less Traffic and Greenhouse Gas impacts and be more congruent with Neighborhood Character and Historic Building Conservation goals contained in the City's General Plan 2020 . I trust that the Planning Commission and City staff will give careful consideration to this suggested Alternative .

Sincerely,  
Roger Roberts  
223 Southern Heights Blvd.  
San Rafael, Calif. 94901

 OVER

On 7/22/13 4:19 PM, "Paul Jensen" <Paul.Jensen@cityofsanrafael.org> wrote:

Hi Roger-

I am forwarding your message to Lisa Newman and to Steve Stafford, the project planner. This way, you have their e-mail addresses. They will need to distribute your comments to the Planning Commission for consideration. One thing you need to keep in mind is that, per the CEQA Guidelines, alternatives that are studied in an EIR must be consistent with the "project objectives." Your alternative offers some good ideas, but do not know if it is consistent with the project objectives.

I will not be attending the Planning Commission meeting tomorrow night. Raffi Boloyan, Planning Manager oversees these meetings, so I have included him in the distribution.

Take care,  
Paul

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**Paul A. Jensen, AICP**  
Community Development Director  
City of San Rafael  
P.O. Box 151560  
San Rafael, CA 94915-1560



415.485.5064

[paul.jensen@cityofsanrafael.org](mailto:paul.jensen@cityofsanrafael.org)

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**From:** Roger Roberts [<mailto:rer.dlr@comcast.net>]

**Sent:** Monday, July 22, 2013 4:08 PM

**To:** Paul Jensen

**Cc:** Tymber Cavasian; Cynthia Landecker; Amy Likover

**Subject:** EIR Scoping for 2d & B Streets Proposed Project , San Rafael

Hello, Paul: I am sending this e-mail response to you because I do not have the e-mail address for Lisa Newman, the Contract Planner of Newman Planning Associates who, apparently , is responsible for handling this project for the City.

My scoping suggestion has to do with the Alternatives Analysis to be provided in the EIR and responds to the size and scale of the proposed subject project and the treatment of the two Victorian houses involved.

1) I am concerned that the proposed project is out of scale and character to the other existing properties in the B Street corridor and it appears that both of the Victorian houses are to be demolished. - LACK OF CONTEXT

An Alternative that addresses this concern seems appropriate and deserves consideration..

1 - PRESERVE 1214 2 NBS  
2 - REDUCE HEIGHT ACROSS  
BS

2) I, therefore, propose a compromise Alternative to be studied in the EIR, which would entail demolition of only the one vacant Victorian house, and maintaining a project keep building height which is no higher than the other buildings in the B Street corridor. This would keep one of the historic buildings on the project site, and reduce the scale of the proposed project. It would maintain consistent neighborhood character in that corridor. This means that the EIR analysis would have to cover 2 options: 1) The elimination or substantial reduction of the proposed commercial space on the ground floor in order to help maintain the number of residential units, or, alternatively, 2) eliminate one floor of residential units and keeping the proposed commercial space on the ground floor. 3) REDUCE SCALE

3) In all cases ingress and egress to the parking facilities to be provided must be into and onto B Street in order to avoid clear traffic conflicts with vehicles using the 2d street arterial through San Rafael.

I offer this EIR scoping alternative for consideration in the desire to encourage and achieve a compromise with the developer that helps to maintain the neighborhood character of the B Street corridor and also to integrate at least one of the historic Victorian structures into the plan for this proposed project.

I trust that the City will seriously consider this proposed alternative for inclusion in the proposed Project EIR.

Sincerely,  
Roger Roberts  
223 Southern Heights Blvd.  
San Rafael, Calif. 94901