



# Responsible Growth in Marin

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San Rafael Planning Commission  
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NOTE: PLEASE INCLUDE IN PUBLIC COMMENTS

Dear Members of the Planning Commission:

As you may know, Responsible Growth in Marin (“RGM”) is a grassroots neighborhood organization concerned with protecting the look and feel of Marin County’s neighborhoods while encouraging responsible growth in housing, business, and economic developments. We believe that these objectives are not mutually exclusive. For some time now we have been following the drafting of the General Plan 2040 (“GP2040” or “the Plan”) and now offer some comments and concerns, particularly concerning North San Rafael and the Northgate area. Thank you for your willingness to listen to all the concerns and suggestions of the various neighborhood groups who have had input into the Plan, not just RGM’s.

## **A. LAND USE ELEMENT**

### **Transit-Oriented Development (p.47<sup>1</sup>)**

RGM is concerned that Transit-Oriented Development (“TOD”) concepts try to impose a “one-size-fits-all” approach on diverse neighborhoods despite the Plan’s vision of “a more limited version of TOD” at the Civic Center Station and around Northgate Mall. The reality is that the SMART train station is a significant walk from Northgate Mall and, heading south, stops half a mile short of the ferry terminal. Bus services are limited. It is clear that private vehicles will continue to be the primary mode of transport for most people in North San Rafael for at least the foreseeable future. Adding high-density housing or large commercial developments to this area, which already suffers one of the most congested freeway on-ramps in the county, will cause increased congestion, increased greenhouse gas pollution, and increased noise pollution. These factors will degrade the quality of life for both existing and new residents as well as negatively

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<sup>1</sup> Page numbers refer to the pdf version of the San Rafael General Plan 2040 Draft available on the City’s website.

impact both old and new businesses in the area, whose customers may be as frustrated as residents at the level of congestion.

We therefore suggest that GP2040 be amended to restrict TOD concepts to Downtown San Rafael and not apply them to suburban areas such as North San Rafael where transit is more limited and traffic congestion is already bad.

### **Growth and the Community (p.48)**

We understand that the City faces significant conflicts of interest between the never-ending pursuit of growth while maintaining the character of existing neighborhoods and the quality of life residents expect. RGM fully acknowledges the need for additional housing – affordable and market – but thinks that further serious consideration and discussion to strike a balance between the quality of life for existing residents, many of whom who have invested many years into their neighborhoods, and the need for growth. Increased commercial uses and additional high-density and excessive infill housing can completely change the nature of mature neighborhoods, with a detrimental effect on the quality of life for residents – both existing and new.

RGM requests that further consideration be given to finding the balance between job and housing growth on the one hand and preserving the look and feel (and quality of life) of existing neighborhoods on the other. We feel that GP2040 should emphasize language that requires new developments (whether housing or commercial) to be complementary to and in character with their surrounding neighborhoods, including such aspects as usage, size, design, materials, and overall appearance.

To this end, consideration should also be given to re-purposing existing, but currently vacant, office and commercial space for housing purposes. The COVID-19 pandemic has changed American working life. Almost overnight, people who couldn't work from home are now working from home. Office workers are exiting cities and moving to suburban and rural areas. Office blocks sit empty. While the long-term implications of this change in working patterns are not yet known, cities should nonetheless explore means of making better use of these empty resources which could provide much needed housing without significantly changing existing neighborhoods. The infrastructure (roads, water, sewer) already exists for these unused buildings. They are currently wasted resources.

### **Climate Change and Transit-Oriented Development (p. 62)**

The concept that TOD is a panacea to reduce greenhouse gases and other types of pollution is, as explained earlier, fatally flawed in areas that do not have a such a robust network of buses as Downtown San Rafael. The State's mandates regarding the use of Vehicle Miles Traveled ("VMT") as the sole tool to reduce private vehicle trips is equally flawed, as the City itself has recognized by its mandate to continue the use of Level of Service ("LOS") metrics to control congestion levels on local roads and at local intersections. We do not need to reiterate all the arguments that the City Council accepted when it made its decision to keep LOS as a metric.

But it bears repeating that not all vehicle miles are equal in their effects on congestion and pollution. The City's goal in reducing greenhouse gases is necessary, but to be effective, City policies must limit emissions from traffic congestion rather than incorporating solely the State's well-intentioned but flawed methodologies.

RGM requests that GP2040 be amended to stress that future commercial and high density housing developments be encouraged in areas where TOD is a realistic concept, and discouraged in areas where TOD is not a realistic concept and where an increase in local traffic congestion, with the attendant increase in greenhouse gas and noise pollution would result in diminished quality of life for residents.

### **Development in Residential Neighborhoods (p.77)**

RGM applauds GP2040's Policy LU-3.2 requiring that new developments in residential neighborhoods preserve, enhance and maintain the residential character of the neighborhood. However, we also request that this Policy be expanded in scope to also apply to remodeling projects and redevelopment of existing buildings in those neighborhoods, and very importantly, also to projects and developments immediately adjacent to existing residential neighborhoods.

New developments or the significant remodeling of existing structures can have major effects – positive as well as negative – on residential neighbors, whether next-door or just across the street. These effects are not limited to just visual, but also include sightlines, views, shadows, and privacy. GP2040 should stress that these factors must be taken into consideration.

### **On-Street Parking (p.78)**

RGM does not understand why GP2040 acknowledges the problems of excessive on-street parking but only plans to mitigate existing problems and not prevent additional ones. GP2040 should also take steps to prevent the problem from arising in areas yet to suffer the problem but which could experience it if excessive infill housing takes place or if high density TOD projects are approved.

Of particular concern, insufficient off-street parking could be a significant problem at Northgate if the Mall becomes mixed use. If plans were approved to incorporate significant housing at Northgate Mall without taking into account realistic needs for parking, the single lane (each direction) roads surrounding the Mall, particularly Northgate Drive, could become choked with parked vehicles. This could present serious safety concerns for emergency vehicles or in the event of needed mass evacuations in case of a disaster such as earthquake or wildfire.

Excessive on-street parking should be curbed in *all* areas and for *all* developments, not just in areas where it already exists. GP2040 should acknowledge and address this serious issue.

## **NEIGHBORHOODS ELEMENT**

### **North San Rafael Town Center (pp. 135-36)**

RGM supports the concept of revitalizing Northgate Mall and generally supports Policy NH-4.2. However, we also have some significant concerns about the Policy as currently written. In particular we are concerned with sub-paragraph e), which plans to *expand* the Mall. What is meant by “expand” the Mall? Where would the Mall expand to – it is completely bounded by Northgate Drive, Los Ranchitos Road and Las Gallinas Avenue? Any expansion within the current boundaries would simply remove on-site parking, which could impact Policy LU-3.7, as discussed above.

More importantly though, this Policy is very premature given the application for a Priority Development Area (“PDA”) grant for the Northgate area. At best sub-paragraph e) sends mixed messages about the City’s intentions and at worst undercuts the PDA grant application.

RGM strongly requests that the word “expand” be changed to “revitalize.”

Additionally, we are concerned that sub-paragraph j) of the Policy requires that the status of the Mall as a significant tax revenue generator be preserved and strengthened. As far as we are aware, this requirement has not been imposed on any other area of the city. RGM questions why Northgate Mall is singled out in this fashion. The inclusion of this requirement gives the appearance that the City has a hidden agenda for the Northgate Mall and is not being open and transparent. Again, this sends mixed messages at best, or, at worst, undercuts the PDA process and would indicate that the City has not entered into that process in good faith.

We hope that these sections of Policy NH-4.2 are simply left-over paragraphs from earlier iterations of GP2040, drafted before the PDA grant application was approved, and that they can be revised or removed.

## **CONSERVATION AND CLIMATE CHANGE ELEMENT**

### **Clean Air and Transportation Choices (pp. 217-19)**

As discussed earlier (and as already acknowledged by the City), transportation choices and clean air can go hand in hand, but cleaner air in neighborhoods will not be achieved by blind adherence to the State’s over-reaching mandates regarding VMT and TOD. GP2040 should explicitly recognize that local congestion and vehicle idling are major generators of greenhouse gases and noise pollution that negatively impact the quality of life (and the health) of San Rafael residents. We remind you that North San Rafael has a higher percentage of senior citizens, who are more vulnerable to such issues. Likewise, encouraging big box wholesale warehouse stores that are designed to attract shoppers (and vehicles) from other cities into San Rafael’s residential neighborhoods will undercut the City’s clean air goals.

Cleaner air can best be achieved by reducing local congestion and idling traffic, encouraging the change to electric and clean fuel vehicles, and by reconsidering the effects of high-density TOD concepts in areas not served by plentiful public transit.

RGM thanks the Planning Commission for its work and for its time to read our comments. GP2040 is a massive undertaking, and overall is a well thought-out and detailed plan.

Sincerely,

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