

**Date:** November 9, 2020

**From:** Responsible Growth in Marin (RGM)

**To:** San Rafael Planning Commission

**CC:** Barry Miller, GP2040 Project Manager  
Rafat Raie, Deputy Director of Public Works  
Paul Jensen, Community Development Department Director  
Raffi Boloyan, Planning Manager  
Lindsay Lara, City Clerk

**Re:** Questions/Requests and Comments for Mobility Element of the City of San Rafael General Plan 2040

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In general, the Mobility Element (ME) is comprehensive, well-written and acknowledges the important consideration of Level of Service (LOS) in addition to the State's mandate to use Vehicle Miles Traveled (VMT) for review under the California Environmental Quality Act. We appreciate how well this Element includes and addresses the concerns that have been raised in public comments and meetings over the last year. (We thank the Staff and Steering Committee for addressing these concerns). Kudos to the City.

Our following comments:

- Summarize the areas of the Mobility Element we support and endorse;
- Address specific areas we believe will enhance the document as a planning template for the next 20 years; and
- Provide some general comments and suggestions.

## **Areas of Endorsement**

We appreciate how clearly the Mobility Element lays out the critical issues, goals, and conflicts in how we travel around our community – to and from our homes, work, schools, stores, etc.

- The Mobility Element acknowledges the reality of our situation – that outside Downtown, San Rafael residents live in suburban communities with insufficient transit options, and those residents will continue to be dependent on their cars for transportation. Therefore, we do not see TOD (transit-oriented development) as a full remedy for greenhouse gas (GHG) emissions.
- The Mobility Element also acknowledges that greenhouse gas emissions are generated both by long commutes and by congested traffic. It incorporates both VMT and LOS traffic measurement methodologies and standards to attempt to decrease emissions from both sources (as well as to improve the overall quality of life).
- The Mobility Element recognizes that traffic congestion is already negatively impacting the lives of San Rafael residents and that there are a significant number of intersections and roadways that currently function below the City's standard for traffic flow.
- The Mobility Element addresses the connection between land use and traffic congestion and greenhouse gases. It requires assessments and mitigation measures for new development that can increase traffic congestion or greenhouse gases.
- We are glad to see program items included for developing specific guidelines on how LOS and VMT methodologies will be implemented in traffic impact studies and local traffic assessments (M-2.5A, pp.10-21) and how VMT analysis will be used in CEQA Environmental Impact Reports (M-3.1A, p.10-28). Understanding how these methodologies will be applied is important both for the public and for project developers and we look forward to robust public input as these guidelines are developed.

- We particularly endorse Mobility Element Goal M-5: "*Provide a transportation system that minimizes negative impacts on neighborhoods while maximizing access and connectivity in the community. Local streets should be safe, attractive, and provide easy access to homes and businesses. Neighborhoods should be protected from the impacts of cut-through traffic, regional congestion, and overflow parking....*"

## **Areas of Concern**

### **1. Unpredictable Traffic Patterns**

*There is a great deal of uncertainty around traffic growth and traffic patterns due to the unexpected effects of Covid-19. While people are clearly doing more work from home, we cannot know what the longer-term result of these changes will be on future traffic. Perhaps this will become more apparent over time during the public comment period and these estimates can be more well-grounded.*

- ME, p. 10-1, acknowledges that Covid-19 has demonstrated the viability (and impact) of a large segment of the population working from home. On p. 10-4, the ME states that prior to Covid-19, traffic volumes in San Rafael and Marin county were moving steadily upwards, the average number of trips had been increasing, and San Rafael had a growing number of employees commuting in from other counties. The ME claims that while the pandemic has temporarily interrupted these trends, they are expected to resume in the future. This may not be valid. There is a documented trend of an increase in tele-commuting post-Covid. People are also taking stock of their lives and the amount of time they spend in traffic and, as a result, are moving closer to work or choosing a workplace closer to home. Some workers are also moving from the City to the suburbs with unknown impacts on commute patterns. In sum, the shake-out of Covid-19 has yet to be seen.
- ME, p. 10-4, claims that the region is projected to add two million people in the next 20 years. This claim is counter to the frequently noted trend in the news that people are moving away from the Bay Area because it has become too expensive to live here. In addition, many employees may continue to telecommute. For example, several

large companies within the computer industry have announced they will continue to permit a large portion of their employees to tele-commute. Other parts of the population are moving elsewhere.

- ME, p. 10-5 and 10-6: This section relies on U.S. Census data. It does not acknowledge that undocumented immigrants, many of whom live in the Canal District, are undercounted by U.S. Census data and therefore are not adequately represented. The ME should acknowledge the discrepancy between the Canal District and the rest of San Rafael. Further, these data are from 2014 through 2018 and may no longer be representative, especially considering the impacts of the pandemic and the Bay Area/California exodus.
- ME, p. 10-27, VMT Explained, second paragraph: “As housing and employment patterns become more dispersed, VMT tends to go up.” This may no longer be necessarily true, particularly if work-from home is increasing.

## **2. VMT/LOS Issues**

- ME, p. 10-14: Cost-benefit considerations. There is no additional guidance in Policy CSI-5 other than “develop guidelines and procedures.” It is difficult to put a dollar value on the “benefits” of transportation projects to compare to their costs. This will invariably be a qualitative discussion unless the City contracts a study to quantify such benefits (expensive and subject to criticism).
- ME, p. 10-28, Policy M-3.2B and C: What is the timeframe/due date?
- ME, p. 10-28, Policy M-3.2B: threshold: Should the City adopt the 15% below regional average recommended by the State’s Office of Planning and Research?
- ME, p. 10-30, Policy M-3.3D: Traditional peak hours have changed in the Bay Area (e.g., morning commute begins considerably earlier), which should be taken into consideration when conducting traffic studies and supporting “efforts to limit traffic congestion by shifting peak hour trips to non-peak hour, modifying school hours to stagger start and end times, and encouraging flexible work schedules.”

### **3. Enforceability and Specificity**

*We recognize that this long-term plan provides the City Council and Planning Staff a template for thinking, assessing, and acting over time. So, because the Plan must take into account future (possible, unknown) conditions, some flexibility in the planning language is useful. However, we believe that if the Plan language is more specific, concrete, and measurable the resulting actions will be more coherent and reflect the longer-term needs and concerns of San Rafael's residents.*

- ME, p. 10-20, Policy M-2.5(d): We suggest revising: "... LOS "F" may shall still be subject..."
- ME, p. 10-21: paragraph 3: We suggest revising: "Guidelines for traffic impact studies and Local Traffic Assessments shall be developed within one year after General Plan adoption. The guidelines shall include metrics for evaluating impacts to the road network where LOS does not apply or where the acceptable LOS is below the "D" standard."
- ME, p. 10-22: paragraph 1: We suggest revising: "Based on such evaluations, the City Traffic Engineer shall develop recommendations..."
- ME, p. 10-23, Table 10-1, 1A, and ME, p. 10-24, Table 10-1, 4B and 4C, and ME, p. 10-17: We suggest including alternative considerations in case the PDAs do not get funded/adopted.
- ME, p. 10-25, Program M-2.8A, and ME, p. 10-25, Policy M-2.10: We suggest including due dates/timeframes for the development and updates of contingency plans.

### **4. Documentation**

*There are a number of references to data in various reports and documents. The following are comments seeking some of those documents and asking for clarification on assumptions used.*

- ME, p. 10-22: “Cost estimates for these improvements are contained in a separate report that provides the foundation for the City’s traffic impact fee program.” We would appreciate a copy of the report.
- ME, p. 10-25, “Transportation ... is the source of 62% of San Rafael’s greenhouse gas emissions and the primary source of local air pollution.” What is the source for this statement?
- ME, p. 10-27, VMT Explained, third paragraph: Are the data available for everyone free of cost or for purchase only?
- ME, p. 10-27, VMT Explained, fifth paragraph: Data are five years old and may no longer be representative.
- ME, p. 10-29: How is the efficiency of TDM measures monitored and what is the success rate so far?
- ME, p. 10-29: “Roughly 10 percent of San Rafael’s employed residents use transit to get to work each day.” Does this include San Rafael’s undocumented residents?

## **5. Parking**

*These comments relate to Policies M-7.6 (Off-Street Parking Standards) and M-7.7 (Parking Management)*

While Policy M-7.6 states "Maintain off-street parking standards that adequately respond to demand, minimize adverse effects on neighborhoods, and sustain local businesses". The Program items under Goal M-7 primarily emphasize reducing off-street parking requirements and then figuring out strategies to manage parking once on-street parking becomes saturated.

This does a disservice to suburban San Rafael residents who find that their historically quiet streets with adequate on-street parking becoming saturated with overflow parking from developments that are not required to provide adequate parking for their residents and customers. Neighborhoods in several areas of southeast and northern San Rafael are already experiencing these problems and the Policies in M-7 will

exacerbate and expand this problem as new development and redevelopments are approved with inadequate off-street parking.

We believe that there needs to be some reality check on how these policies of reducing on-site parking are actually affecting the surrounding neighborhoods. *Some standards are needed for maintaining adequate on-street parking in residential neighborhoods to counterbalance the movement to continually decrease the amount of off-street parking required for proposed projects.* Creative parking solutions are fine, but they should be implemented *before* on-street parking in suburban neighborhoods is allowed to become saturated with overflow parking. There should be an acknowledgement that all neighborhoods need sufficient parking, so our streets are not all just permanently lined with parked cars (such as has happened to parts of Nova Albion Way and adjacent streets in Terra Linda).

### **Other Comments, Questions and Suggestions**

*The following provides a number of revisions and clarifications that we think will improve the Mobility Element.*

- ME, p. 10-12, Goal M-12: The Introduction paragraph 4 needs to include "reducing congestion" as part of reducing GHG emissions.
- ME, p. 10-6, Mobility Characteristics: It would be helpful to add one more pie chart to illustrate paragraph 2 (where San Rafael residents go to work).
- ME, p. 10-21, Program M-2.5: This specifies what should be included in Traffic Impact Studies which "will be required for projects with the potential to increase congestion, create safety hazards, or otherwise impact local circulation conditions." However, it does not specify how to identify projects with potential to cause these negative impacts. This Program item should include a requirement that the future guidelines for traffic impact studies and Local Traffic Assessments also specify how it will be determined that a project has the potential to increase congestion, create safety hazards, or otherwise impact local circulation conditions.

- ME, p. 10-23, Table 10-1, 2E: "... while maintaining high quality transit route along 4<sup>th</sup> Street..." Why not consider a pedestrian zone along 4<sup>th</sup> Street?
- ME, p. 10-30, Policy M-3.4B: What role would, or could the City play here?
- ME, p. 10-34: "Program M-4.2B: Rail Service." Why enshrine support for an ineffective transportation mode into the General Plan?
- ME, p. 10-35: "... to elevate the tracks through Downtown." We suggest that the City request an assessment of undergrounding the tracks so as to avoid the problems of further dividing downtown San Rafael? (The elevated freeway is the source of a host of problems, as acknowledged elsewhere.)
- ME, p. 10-39: "... safe and separated underpass or overpass pedestrian and bike path crossings where needed." Please instead consider underpasses for vehicles to improve character of neighborhoods and walkability.

#### Minor comments

- ME, p. 10-9: "The trains provide an important commute option..." We question the veracity of this statement and request support.
- ME, 10-9: should also mention "Sonoma Airport."
- ME, p. 10-13: Last sentence in blue section should also mention handicap accessibility.

#### Corrections/Typos:

- ME, p. 10-3, bullet Land Use "...jobs-housing balance that enables..."
- ME, p. 10-6, section "Data collected by the Transportation Authority of Marin (TAM) indicates that the average daily trip length in San Rafael is 8.2 miles. This is slightly ~~higher~~ lower than the county

average of 9.1 miles and nearly 20 percent higher than the Bay Area average of 6.9 miles.”

- ME, p. 10-21, paragraph 1: “Unless covered by the ~~exemptions~~ exceptions in Policy M-2.5...”
- ME, p. 10-37: “... Civic Center Station Area Plan” Should this refer to the North San Rafael PDA?

### **Summary**

We thank you again for producing such a complete and thorough document for shaping the transportation future of our beloved community. We so appreciate the opportunity to seek clarification about and provide input to this element of the 2040 General Plan. We look forward to any responses or questions that you may have about our comments and suggestions.