



SAN RAFAEL

THE CITY WITH A MISSION

Community Development Department – Planning Division

Meeting Date: December 15, 2020

Agenda Item: 3

Case Numbers: GPA16-001 & P16-13

Project Planner: Barry Miller, Consulting Project Manager (415) 485-3423

REPORT TO PLANNING COMMISSION

SUBJECT: Public Hearing on Draft San Rafael General Plan 2040. Third public hearing on the Draft General Plan 2040 to follow up on the comments and questions raised during the hearings convened on October 27 and November 12, 2020. Case Nos. GPA16-001 & P16-013.

EXECUTIVE SUMMARY

San Rafael has updated its General Plan, moving the time horizon forward from 2020 to 2040 and making revisions to address state laws, updated forecasts, community input, and emerging issues and trends. The City released Draft General Plan 2040 for public review in October 2020. A public hearing on Chapters 1-9 took place on October 27 and a public hearing on Chapters 10-14 took place on November 12.

Work on the Draft Plan began three years ago and was guided by a 24-member Steering Committee. Concurrently with the Draft General Plan, the City prepared a Downtown Precise Plan; that document is scheduled for publication as a Public Review Draft on December 23. The City has prepared an Environmental Impact Report (EIR) covering both General Plan 2040 and the Downtown Precise Plan, which is also scheduled for publication on December 23. The EIR will have a 60-day comment period, ending on February 22, 2021.

As of December 10, 2020, the City has received roughly 20 letters on Draft General Plan 2040 and has convened more than five hours of public hearings. The December 15 meeting is an opportunity to review the feedback received to date and discuss staff's strategy for replying to comments.

In early 2021, staff will prepare an Addendum to the Draft Plan that identifies specific text changes to be incorporated. The Planning Commission will ultimately be asked to recommend adoption of the General Plan 2040, inclusive of these changes, to the City Council. The Planning Commission also will be asked to make recommendations on the Downtown Precise Plan and the EIR to the City Council. Additional Planning Commission hearings have been tentatively scheduled for the first four months of 2021.

Most of the content of this staff report is contained in four attached exhibits. These include: (a) responses to public comments received to date; (b) responses to Planning Commissioner comments; (c) a sample implementation matrix; and (d) potential metrics to be incorporated into the Plan Appendix.

The Draft Plan is available for review at www.sanrafael2040.org. Opportunities for public comment will continue at future hearings to be convened in early 2021, concurrently with review of the Downtown Precise Plan and a Draft Environmental Impact Report covering both projects. The Commission is tentatively scheduled to take action on the 2040 General Plan in April 2021. The City Council will hold public hearings following Planning Commission action.

RECOMMENDATION

It is recommended that the Planning Commission take the following actions, following the staff presentation on General Plan 2040:

1. Re-open the public hearing on Draft General Plan 2040;
2. Receive public comments and testimony;
3. Discuss staff's approach to responding to the various comments received, as well as the Implementation Matrix and potential metrics; and
4. Continue the hearing to January 12, 2020 for further public testimony and discussion (note: the January hearing will focus on the Downtown Precise Plan but comments on the General Plan will continue to be accepted).

PROJECT BACKGROUND

General Plan 2040 Overview:

Prior staff reports have provided detailed information on the General Plan Update. The September 15, 2020 study session report, which preceded publication of the Draft General Plan 2040, can be reviewed [here](#). The October 27, 2020 hearing report can be reviewed [here](#) and the November 12, 2020 hearing report can be reviewed [here](#).

As noted in those reports, Draft General Plan 2040 is comprised of 13 topical chapters or "elements." Twelve of those elements have been updated (or newly prepared) as part of the overall General Plan Update. These are: Land Use; Neighborhoods; Community Design and Preservation; Conservation and Climate Change; Parks, Recreation and Open Space; Safety and Resilience; Noise; Mobility; Community Services and Infrastructure; Arts and Culture; Economic Vitality; and Equity, Diversity, and Inclusion. The 13th Element, covering Housing, will be updated in 2021-2022 according to a schedule set by the State of California.

The Update process was initiated in December 2017. It included collection of "existing conditions" data, an "audit" of all existing policies and programs, development of guiding principles, updating the Land Use Map, and development of new or revised goals, policies, and programs on each topic area. The process was guided by a 24-member Steering Committee, who convened 25 times over a 2 ½ -year period. The Steering Committee represented diverse viewpoints and interests and provided both oral and written feedback on the Plan as it was developed. Broader public engagement occurred through community workshops, "pop-up" events, meetings with neighborhood groups and community organizations, surveys in English and Spanish, and numerous presentations to Boards, Commissions, and the City Council.

Major changes to the General Plan include new goals, policies and programs on sea level rise, wildfire hazards, equity, and social justice issues, as well as a stronger focus on Downtown development and greenhouse gas reduction. The Plan adds new policies on historic preservation, sustainability, climate change, renewable energy, bicycle and pedestrian circulation, community services, and arts and culture. It also includes an updated Land Use Map, with strategic changes that will facilitate housing production and economic growth while protecting important open spaces and natural resources.

Other Work Products:

In 2018, the City received a One Bay Area Grant (OBAG) from the Metropolitan Transportation Commission (MTC) to prepare a Downtown Precise Plan. Work on the Plan began in January 2019 and continued through 2019 and 2020. The Plan will replace 1993's "Our Vision for Downtown San Rafael" and serve as a planning and policy guide for Downtown land use, urban design, transportation, housing, and historic preservation activities. The Plan also includes a "Form Based Code" that will replace existing zoning in Downtown San Rafael. The Draft Downtown Precise Plan was originally scheduled for

publication in mid-November but is now scheduled for release on December 23. Digital files will be posted to the City's website on that date. The January 12 meeting of the Planning Commission will focus on the Precise Plan and the January 26 meeting will focus on the Form Based Code.

The City has prepared a Draft Environmental Impact Report (Draft EIR) covering both the General Plan 2040 and Downtown Precise Plan. The Draft EIR evaluates the potential impacts of these two plans on natural resources, transportation, urban services, safety, and other topics as required by the California Environmental Quality Act (CEQA). The Draft EIR identifies measures to mitigate potentially significant impacts and further identifies those impacts which are significant and unavoidable. The Draft EIR had been scheduled for release in November but is now scheduled for release on December 21-23. Digital files will be posted to the City's website on that date, and appropriate notices will be filed. Completion of the Draft EIR begins a 60-day review period for public comment, closing on February 22, 2021. The City has scheduled a public hearing for February 9, 2021 to take comment on the EIR.

Once the Draft EIR review period closes, the City will prepare a "Response to Comments" document and make any necessary changes to the document. A "Final EIR" that incorporates the Responses to Comments will be brought to the Planning Commission in a public hearing.

At the same time, the City will make necessary changes to the Downtown Precise Plan and General Plan 2040 that respond to public comment. Planning Commission action on the three documents (Final EIR, revised Downtown Precise Plan and revised General Plan 2040) is anticipated in April 2020. At that point, all three documents would be forwarded to the San Rafael City Council for action.

ANALYSIS

This section of the staff report provides an overview of the comments received on General Plan 2040 as of December 10, 2020. It also provides a summary of the General Plan Implementation Appendix, which is now in production.

Overview of Written Comments

The following letters have been received on General Plan 2040 since October 2:

- Audubon Society comments on Neighborhoods Element and Conservation/ Climate Change Element
- Shirley Fischer comments on Conservation/ Climate Change Element
- Responsible Growth Marin comments on Land Use, Neighborhoods, and Conservation/ Climate Change Element
- Terra Linda Homeowners Association comments on Land Use, Neighborhoods, and Conservation/ Climate Change Element
- San Rafael Heritage preliminary comments on Community Design and Preservation Element
- Victoria DeWitt/ Hillside Neighbors comments on Chapters 3-8
- 11 individual letters and emails requesting stronger and more prescriptive standards for redwood tree protection
- Sierra Club request that September 2 comments from Marin Conservation League be considered in the revisions
- Responsible Growth Marin comments on Mobility Element
- Victoria DeWitt/Hillside Neighbors comments on Chapters 10-14

All these comments were previously provided to the Planning Commission and posted to the City's website. In addition, staff has received informal comments from a number of parties (via email or the website) requesting minor edits to the Plan. These include a factual correction from ArtWorks and a clarification to the historic resources map.

Additionally, on September 2, staff received comments on the Plan from Marin Conservation League (MCL). Those comments were appended to the Sierra Club comments that were submitted to the Planning Commission on October 27. Because the MCL comments were received while the Draft Plan was still being assembled, most of them were incorporated in the October Draft. MCL comments on the Land Use Element were not incorporated since that Element had been completed and fully formatted by September 2.

Major themes in the 20 letters received to date relate to tree protection (11 letters), wetlands protection, neighborhood character, development impacts, emergency access, fire safety, historic resources, and traffic. While some of the comments are “global,” most are quite specific and request alternative or additional language for consideration. A number of the global comments relate to the use of “should” vs “shall” in a policy (or “encourage” vs “require,” etc.). Staff has been intentional in its choice of “should” vs “shall” in order to maintain flexibility and balance the General Plan’s competing objectives.

Attachment 1 to this Staff Report summarizes the comments in the first column and includes a staff response in the second column. The comments have been paraphrased for presentation purposes.

Overview of YouTube Live and Zoom Comments at Public Hearings

The public hearings held on October 27 and November 12 each included an opportunity for public comment. Comments were made using the YouTube Live chat feature and Zoom’s phone-in feature. Public comments generally tracked the written comments described above.

At the October 27 public hearing, there were 10 comments entered into the record from the YouTube Live feed and four call-in comments. These comments are highlighted in Attachment 1 of this report. Eight of the 14 comments requested revision of the draft program in the Neighborhoods Element specific to Northgate Mall (eliminating reference to expanding the mall or strengthening it as a revenue generator), Other comments related to preservation of Eichler, Alliance, and Kenney Homes; the importance of strong environmental protection measures; alignment of climate-related measures with Drawdown Marin; and the noise standards.

At the November 12 public hearing, there were five comments entered into the record from the YouTube Live feed and seven call-in comments. These comments are highlighted in Attachment 1 of this report. Seven of the 12 commenters were representatives of Responsible Growth in Marin, reiterating points in a letter on the Mobility Element submitted prior to the November meeting. Public comments at the hearing related to parking, the need to re-evaluate mobility in a post-COVID environment, and the viability of transit-oriented development in North San Rafael. Other speakers/ commenters addressed wetlands protection, support for the arts (and the need for stronger implementation tools), and climate change.

Attachment 1 of this Staff Report includes the YouTube Live and oral testimony as well as the letters received. Again, the comments have been paraphrased for presentation purposes. Staff responses are included.

Overview of Planning Commission Comments

Planning Commission comments are summarized in Attachment 2 of the staff report. Global comments are presented first, followed by comments on each Element. The global comments related to the addition of metrics to the document, additional framing of interconnected Plan themes and concepts, further assessment of the City’s vision for its economy, and more direct links to the related documents that implement General Plan policies. The element-by-element comments include specific edits to policies and programs, along with broader questions on how various topics are handled. Attachment 2 provides staff’s proposed approach to the comments but does not include the edits themselves. Comments have been paraphrased for presentation purposes.

In response to Commission input, staff will add potential metrics for each General Plan Element to the Implementation Appendix. While there are measurable objectives throughout the General Plan, they are not specifically called out or highlighted. Examples of metrics include Vehicle Miles Traveled, traffic Level of Service, park acres per 1,000 residents, annual housing production (total and by income), unemployment rates, and police and fire response time, among others.

Examples of possible metrics are included in Attachment 4. A benefit of using metrics is that they can be referenced in the General Plan Annual Report and are helpful for tracking progress and determining where future Plan amendments may be needed. The list of possible metrics in Attachment 4 is intended as a starting point and should be refined in future years as the Plan is implemented. Planning Commission input on this topic is encouraged.

The Commission also suggested that the Plan include a “Call to Action” regarding the cumulative effects of the “forces driving change” that are highlighted in Chapter 2 (pages 2-5 through 2-15). This is timely, given the impacts of COVID-19 on the City’s economy as well as on-going discussions of housing, equity, social justice, sea level rise, wildfire hazards, and climate change. Of particular importance is how the City’s economy may be reshaped by the pandemic and by broader trends in the retail, office, industrial, health care, technology, and other sectors. The “Call to Action” will be added before Plan adoption.

Sample Implementation Matrix

Attachment 3 to the Staff Report presents the implementation matrix for the Land Use Element. Similar matrices are being prepared for every element of the Plan. Implementation programs appear in matrix rows. The first matrix column indicates the timing of the action (short-term, medium-term, long-term, and ongoing). A second column identifies the responsible parties, with the lead department highlighted in bold. A third column is included to indicate potential resources, such as staff time, fees, grants, private funding, etc. Finally, the matrix shows which of the General Plan’s guiding principles are supported by implementing the program. As noted above, a list of potential metrics for each element will be added to the end of each matrix.

CORRESPONDENCE

No correspondence has been received since the last Planning Commission meeting on November 12, 2020. Any correspondence related to this staff report will be forwarded to Commissioners and posted to the City’s website prior to the meeting time.

EXHIBITS

1. Summary of Public Comments on General Plan 2040 (through December 10) and Staff Responses
2. Summary of Planning Commission Discussion on General Plan 2040 and Staff Responses
3. Sample Implementation Matrix (Appendix A): Land Use Element
4. Potential Plan Metrics

ATTACHMENT 1:

General Plan 2040 Public Comments and Responses (as of 12/10/20)

Note: Comments have been paraphrased for presentation purposes

Comment	Response
COMMENTS FROM THE OCTOBER 27 PLANNING COMMISSION HEARING	
<i>YouTube Live Comments</i>	
Laura Silverman-Terra Linda. The Northgate Mall policy includes a Clause (j) that calls for Northgate to be strengthened and preserved as a tax revenue generator. Does that provision apply anywhere else in the city?	The referenced Clause NH-4.2(j) is being deleted. This would be determined through the PDA planning process.
Claire Hallenbeck - Delete language about Mall expansion. The Mall doesn't need to be expanded. It should serve the community and would generate more revenue through property taxes rather than sales taxes. Focus instead on adding housing; don't single it out this site as being a revenue generator.	The reference to mall expansion (NH-4.2e) and revenue generation (NH-4.2j) is being deleted. This would be determined through the PDA planning process.
Scott Frierich- Eichler homes need to be preserved.	This is specifically supported by Policy NH-4.5 and Program NH-4.5A.
Susan Coleman-Northgate needs to be revitalized as a community center with restaurants and events	The proposed text supports this outcome.
Regina Kretschmer- Mall should be revitalized as a vibrant Town Center that benefits existing residents and new residents with housing, services, other uses, that complement the neighborhood	The proposed text supports this outcome.
Pam Reaves- Page 2-2 In the Framework section "looking back/ historical context" please add "May we do right by this Miwok land we occupy" Noise Element Programs 2A and 2B seem to be inconsistent and perhaps unhelpful as a guide – shall new development not increase noise levels by 3 dB, or does it follow Table 9-2? Delete the reference to expanding the mall and sustaining it as a tax revenue generator. Don't pre-empt the PDA	<ol style="list-style-type: none"> (1) Historic displacement of Miwok people from their land is acknowledged on page 14-1. (2) Policy N-2 clauses (a) and (b) are additive—it is not intended as an "either/or". In other words, in the event either of these conditions is not met, an acoustical study is required. (3) Reference to revenue generator has been deleted.
Laurie Parini- I second Rebecca Kretschmer's comments	Comment noted.
Shirley Fischer- wording in GP should not pre-empt decisions to be made through PDA community based planning processes	The referenced Clause NH-4.2(j) is being deleted.
Chris Hart-Supports the Plan.	Comment noted.
Roger Smith: Nothing in the GP is etched in stone, everything can be changed and revised periodically.	Comment noted.

Comment	Response
Zoom Phone-In Comments (Oct 27)	
<p>Kate Powers/ MCL: Thanks staff for successful process. Environmental planning should be framed as more than just mitigating impacts; CEQA streamlining makes it more critical to incorporate things like environmental quality into land use goals rather than focusing on managing growth. The Plan needs to ensure natural resource protection (and sea level rise adaptation/ wildfire prevention); clear, consistent policies are essential.</p>	<p>MCL comments on Land Use Element will be incorporated in subsequent revision to this section.</p>
<p>Bill Carney/ Sustainable San Rafael: The General Plan provides an opportunity to help San Rafael evolve into a more walkable, bikeable, and transit served community. The Plan balances this priority with other goals, including resource protection. Please consider including updated GHG targets to align the Plan with Drawdown Marin (DM). Marin Grand Jury has asked for aggressive action on climate adaptation.</p>	<p>We will reference the updated Drawdown Marin data in Chapter 6 and work with the City's Sustainability Coordinator on possible revisions. However, the intent is to maintain consistency with the Climate Change Action Plan in 2019 and the now-completed Environmental Impact Report for the General Plan.</p>
<p>David Smith/ RGM. Please consider comments in the Responsible Growth Marin letter. Do not pre-determine outcomes for the PDA Plan by calling for revenue-generating uses at Northgate Mall.</p>	<p>The referenced Clause NH-4.2(j) is being deleted.</p>
<p>Barbara Salzman: Audio problems</p>	<p>See comments in response to Audubon's letter below.</p>
COMMENTS FROM THE NOVEMBER 12 PLANNING COMMISSION HEARING	
YouTube Live Comments	
<p>Shirley Fischer/ RGM: Please consider recommendations of the RGM letter related to mobility, including uncertainties about post-COVID travel patterns. Less commute traffic may result in more local traffic.</p>	<p>See response to RGM letter below</p>
<p>Pam Reaves/ RGM: (1) Each public meeting should begin with acknowledgement of indigenous land we occupy. (2) CSI-4.7A—City should mandate use of cool pavement. (3) I support MCL's letter. (4) Use most current SLR data</p>	<p>(1) Comment is noted. (2) Program C-4.2E encourages the use of cool pavement; (3) MCL comments on Land Use Element will be incorporated, prior comments were previously incorporated to the extent possible and appropriate; (4) Most current Sea Level Rise data is being used.</p>
<p>David Smith- Please consider the RGM comments</p>	<p>Comments are being considered. See responses below.</p>
<p>Scott Frerich/ RGM: Standards are needed for parking near proposed housing areas. Policy M-7.6 suggests decreasing parking standards in high density areas to encourage housing. This is unfair—need to balance new housing with preserving quality of life.</p>	<p>Parking reductions are only recommended to the extent it can be demonstrated that there will be lower vehicle ownership rates—for instance, for senior housing. This subject will continue to be revisited over time.</p>
<p>Phil Halstein/ RGM: Consider more actionable language where possible—including replacing “may” with “shall”.</p>	<p>Specific proposals for changing “should” to “shall” are being considered on a case by case basis. Flexibility is an important part of the General Plan—mandatory language is not always appropriate.</p>

Comment	Response
<i>Zoom Phone-In Comments (Nov 12)</i>	
<p>Rich Storek/ Canal Arts Initiative, coalition of arts groups: The City needs a new body to approve and streamline approval of art projects. We have a project at 3301 Kerner that will be expensive and time consuming to approve.</p>	<p>The General Plan calls for an Arts Master Plan, which would identify the best vehicle for streamlining arts applications and reviewing projects. An Arts Commission is not likely at this time due to budget constraints but could be considered in the future.</p>
<p>Barbara Salzman/ Audubon: Please remove the language in NH-3.24 that suggests development of Canalways should be economically viable for the site’s owner. This doesn’t belong in the General Plan. The site is important for sea level rise planning and habitat. Only a small upland area along the street should be allowed for development. We agree with the basic intent of the wetland policies but are concerned with allowances for exceptions. Specific criteria for exceptions should be established. We support the speakers from the prior meeting calling for redwood protection—but this should be expanded to all native trees (and should exclude non-native trees such as eucalyptus).</p>	<p>The reference to “economically viable” will be removed from Policy NH-3.24. The text acknowledges the importance of Canalways for sea level adaptation and habitat, and the Land Use Map shows development only on the upland portion of the site. The wetland policies are carried forward from General Plan 2020 with minimal changes. There was extensive discussion of these policies by the General Plan Steering Committee, with some members suggesting they be removed entirely to reflect State and federal jurisdiction over this topic. However, prior policies have been maintained for CEQA mitigation and to reflect the importance of these areas to the city.</p>
<p>Phil Halstein/ RGM: Appreciative of staff work.</p>	<p>Comment noted.</p>
<p>Bill Carney/ Sustainable San Rafael. Commissioners should be mindful of the Climate Change Crosswalk (page 6-38). Keep in mind that: (1) VMT is a new metric and is of great importance for addressing GHG emissions. (2) TOD doesn’t just mean more development—it also means more transit. Need to build up our transit resources Downtown and at Northgate. (3) TDM strategies are really critical to making this work. Transit passes for employees and so on. (4) Cost-benefit analysis is good, but ultimately these decisions involve qualitative judgements; (5) Housing will be critical to our future discussions; (6) Infrastructure – continue our focus on getting organics out of landfills; (7) Recognize the impacts of climate change on disadvantaged communities.</p>	<p>Comments noted. The comments are intended to advise Planning Commissioners of things to consider as they review the document.</p>
<p>Elizabeth Setten/ Artworks Downtown. Thank you for the arts policies. The missing link here is a pragmatic approach for how to accomplish the goals. Please consider a vehicle to carry out the ideas in the Plan, such as an Arts Board.</p>	<p>See response to Rich Storek above. General Plan Program AC-1.1C calls for an Arts and Culture Master Plan which would be an important first step to establishing a decision-making body and detailed implementation program.</p>
<p>Kate Powers-How will staff respond to the Audubon comment on Canalways? How can we rectify the proposed increase in jobs with Plan Bay Area 2050, which shows a decrease in Marin? Please focus transit-oriented development in areas with jobs and not in areas without employment or bus connections.</p>	<p>See response above re: Canalways. The 2050 forecasts are still preliminary and have not been finalized; staff does not agree with the ABAG job projections for San Rafael. Comment on TOD is noted –the focus is on Downtown San Rafael, rather than the Civic Center Station. Further assessment will be provided through the PDA planning process.</p>
<p>Grace Geraghty/RGM: Audio issues</p>	<p>N/A</p>

Comment	Response
Letter from Shirley Fischer – October 21, 2020	
<p>a. Add a policy and program(s) to create a Wildlife and Ecosystem Master Plan in collaboration with County, State, private landowners, and other stakeholders. This Plan should include an analysis of the habitat and wildlife corridor needs of each major species in the San Rafael Planning Area, priorities for conserving and enhancing habitat and corridors and mitigating wildlife-human conflicts, and action items for implementing these priorities. The Plan should include consideration of flora, insects, reptiles, and amphibians as well mammals.</p>	<p>We will broaden Policy C-1.11 so it addresses not only wildlife corridors, but wildlife and ecosystems more generally. City funding for a Wildlife Master Plan is not likely given competing priorities. However, we will broaden Program C-1.11A to reference not only mapping of wildlife corridors but also support for future master planning related to wildlife and ecosystem management. The City would likely not be the lead agency in such a study but would be a participant and contributor.</p>
<p>b. Add a policy and program items for managing the Wildlife-Human Interface. This policy will recognize how wildlife literally live in our backyards and identify measures for coexistence and reducing conflicts. Programs can include private and public education programs about animals living around us and ways to coexist and also the need to modify human behavior.</p>	<p>Recommend adding new program C-1.11B to support efforts to balance human-wildlife interface and improve public understanding and education per the comment.</p>
<p>c1. The description of Vegetative Cover in Table 6-1 should not lump “Urban/Barren” together, as urban areas contain abundant wildlife.</p>	<p>“Urban/Barren” will be changed to “Urban/ Other”</p>
<p>c2. The description of urban habitat areas should acknowledge the diversity of wildlife in these areas.</p>	<p>P. 6-3, second 2nd para narrative will be edited to acknowledge species diversity and the need for measures to balance wildlife and human development in urban areas.</p>
<p>Description of wetlands on P 6-6 should acknowledge the importance of adjacent uplands as refuge for wetland species. Upland areas adjacent to wetland areas should remain undeveloped.</p>	<p>Text on Page 6-6 will be edited to note the value of adjacent uplands. EIR may identify additional mitigation measures for development in such areas.</p>
Letter from Marin Audubon – October 21, 2020	
<p>The discussion of Canalways in the Neighborhoods Element does not acknowledge the 50-year effort by the environmental community to protect this site from being developed and prior attempts to purchase the site as open space.</p>	<p>Some of this information will be added to the profile on Page 4-49. The site remains on the General Plan inventory of potential sites for open space acquisition.</p>
<p>The statement in Policy NH-3.24 that development on Canalways should be economically viable for the property owner must be deleted.</p>	<p>The reference to economic viability will be removed from the policy.</p>
<p>Policy NH-3.24 should not merely state that development is responsive to the site’s resources—it should protect these resources.</p>	<p>The need to protect site resources will be stated.</p>
<p>The biological assessment and jurisdictional determination should not be done by the applicant’s consultant as this may not reflect the condition of the site under normal circumstances.</p>	<p>Comment noted. Programs under Policies C-1.3 and C-1.4 indicate that such studies must be done by an independent wetland expert.</p>

Comment	Response
We support the current General Plan requirement that limits development to the higher elevation area on the west side of the property only.	The General Plan 2040 Land Use Map designates a small area on the western part of the site for Light Industrial/ Office, consistent with the existing Plan. The majority of the site retains its Conservation designation. Although the text acknowledges the possibility of a future General Plan Amendment to expand this footprint for housing, this would be subject to environmental review and community outreach. This site received considerable discussion by the General Plan Steering Committee, with some members advocating for its development and others advocating for long-term conservation. A balanced approach is supported here.
The City has not been supportive of the Kerner extension in the past.	Page 4-49 text box, will change “extension of Kerner will be required” to “extension of Kerner could be required”
Wetlands Policy C-1.1. City should have first regulatory review over wetlands. The text sounds like City will rely on federal, state, and regional agencies. Regulation by state and federal agencies is required and actually does not need to be mentioned in policies.	The General Plan 2040 Steering Committee was divided on the best approach. A number of members made the reverse argument, which was that the existing wetland policies are excessive since wetlands are regulated by federal, state, and regional agencies. Again, the text balances both perspectives and carries forward existing City policies. Staff suggests waiting until EIR is released before making further edits.
Program C-1.1A: Should recognize that different agencies have different wetland definitions.	Consistent with existing practice, the text recognizes wetlands delineations consistent with the Army Corps of Engineers.
Program C-1.1B: We strongly support this program, which supports restoration of Tiscornia Marsh.	Comment noted.
Policy C-1.3: This policy offers unacceptable exceptions to protecting wetlands, including that protection is “not practical”—it does not meet the intent of the policy.	This is carried forward verbatim from the existing General Plan. Since the policy already uses the verb “avoided” rather than “prohibited”— the requested change can be made. Suggest removing “unless is not possible or practical.”
Program C-1.3B: Conditions for Mitigation Waivers are too broad (letter includes further detail)	These conditions are carried forward from General Plan 2020 and resulted from extensive discussions during the prior Plan update. No changes are recommended at this time.
Program C-1.3C: Delete reference to “other Bay Area jurisdictions.”	Will delete per the comment.
Program C-1.4C: We oppose mitigation banking.	Comment noted. No change proposed.
Policy C-1.5: We disagree with the exception “if it can be demonstrated that the proposed setback protects the functions of the wetlands to the maximum extent feasible.”	Comment noted. The setback waiver is carried over from General Plan 2020.
Policy C-1.12 should address protection of native trees. Policy C-1.16 and C-1.17 and related programs should indicate a preference for native trees rather than non-native.	Policy C-1.12 addresses habitat more generally, but we will edit Programs C-1.16A and C-1.16C and Policy C-17 to note the emphasis on native trees.

Comment	Response
P 6-16 text box on special status species: owls nest on top of tall trees, not on “platforms”	The requested edit will be made
Program C-1.13A: The CA Natural Diversity Data Base is not current—data from additional sources will be provided	Program will be added to note that data from additional sources should be maintained where available.
Program C-1.19A: Accompanying dark sky policy, bird-friendly glass should be required to reduce potential collision impacts	Encouraging bird-friendly glass in vegetated habitat can be added to Program.
Letter from Responsible Growth Marin – October 22, 2020	
Land Use Element P 3-3. The Transit-Oriented Development (TOD). The TOD discussion implies a one-size-fits-all approach, which is in conflict with the Plan’s vision of more limited development at Civic Center Station/ Northgate. Private vehicles will be the predominant mode of travel and SMART and bus service is limited. Adding high-density housing in this area will degrade the quality of life and have adverse impacts. Amend the Draft to restrict TOD concepts to Downtown and not North San Rafael.	No changes are proposed. The first paragraph is intended only to provide a definition of TOD. The second applies this definition more specifically to San Rafael and states the expectation that private vehicles will continue to be the predominant mode of travel. The third paragraph explicitly states that a different approach should be taken in North San Rafael than in Downtown.
Land Use Element P 3-4. Growth Management/ Community Benefits. We acknowledge the need for additional housing but think further consideration is needed to balance growth and neighborhood conservation. Increased development can have a detrimental effect on the quality of life. General Plan 2040 should emphasize language requiring new development to be complementary to surrounding neighborhoods. Further consideration should be given to repurposing existing commercial and office space for housing, particularly in light of the pandemic’s impacts on how we work.	The text that appears in this section is consistent with the comment. The intent of this section is to discuss the importance of development being permitted only when adequate infrastructure is available, and further that development should “pay its way” when it is approved. The importance of neighborhood compatibility is reinforced throughout the Plan, especially in the Land Use, Neighborhoods, and Community Design/ Preservation Elements. The idea of converting underused office space to Housing is strongly supported by the Land Use and Housing Elements. Almost all of the housing growth anticipated in North San Rafael is on sites currently occupied by commercial and office uses.
Policy LU-1.3 and Program LU-1.3A on Climate Change and Transit-Oriented Development. The concept that TOD is a panacea to reduce GHG is flawed in areas that do not have a such a robust network of buses. Reducing GHG is necessary but emissions from traffic congestion must be limited. GP 2040 should be amended to stress that future commercial and high-density housing should be encouraged only where TOD is realistic and not in areas where it would increase congestion and diminish the quality of life.	The policy and program are consistent with this comment. The policy states that TOD be focused in areas where alternatives to driving are most viable and shorter trip lengths are possible. Later sections of the General Plan (particularly the Neighborhood Element) provide a finer-grained analysis of where these areas are located (primarily Downtown). The intent of Program LU-1.3A is not to promote TOD, but rather to objectively measure where higher densities make the most sense, will achieve the intended benefits of lower GHG emissions, and will not negatively impact the quality of life.
Policy LU-3.2: New Development in Residential Neighborhoods. We support this policy, and request that it be expanded in scope to also apply to remodeling projects, redevelopment of existing buildings, and projects adjacent to residential areas.	We will add a sentence to Policy LU-3.2 that acknowledges the importance of maintaining land use compatibility when buildings and projects adjacent to residential areas are redeveloped, substantially remodeled, or changed to a new use.

Comment	Response
<p>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.</p>	
<p>Policy LU-3.7: On-Street Parking. GP2040 acknowledges the problems of excessive on-street parking but only plans to mitigate existing problems and not prevent additional ones. The Plan should include steps to prevent the problem from arising in areas where it could occur in the future due to infill housing takes or high-density TOD projects. Of particular concern, insufficient off-street parking could be a problem at Northgate if the Mall becomes mixed use without adequate parking. This could present safety and evacuation concerns. Excessive on-street parking should be curbed in <i>all</i> areas and for <i>all</i> developments, not just in areas where it already exists.</p>	<p>Policy LU-7 and Program LU-3.7A will be edited to note the importance of managing parking so that it does not become a problem in the future.</p>
<p>Neighborhoods Element Policy NH-4.2 North San Rafael Town Center. RGM generally supports the policy but is concerned about clause (e) to “expand the Mall”. Please replace the word “expand” with “revitalize.” We are also concerned that clause (j) requires that the Mall be preserved and strengthened as a tax revenue generator. This suggests a hidden agenda for the Mall and undercuts the PDA process.</p>	<p>The reference to expanding the Mall is carried over from Policy NH-133 in General Plan 2020. It will be replaced with the word “revitalize,” which was also in General Plan 2020. Clause (j) referring to the Mall as a revenue generator will be deleted.</p>
<p>Conservation Element Policy C-2.3 Improving Air Quality Through Land Use and Transportation Choices. Cleaner air in neighborhoods will not be achieved by blind adherence to the State’s over-reaching mandates on VMT and TOD. GP2040 should 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. 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.</p>	<p>The policy is not consistent with the views expressed in this comment. As drafted, the policy indicates that land use and transportation choices affect air quality. It further states that objective data should be used to make informed choices about the best ways to reduce the length of vehicle trips, promote alternatives to driving, and encourage cleaner-fuel vehicles.</p>

Comment	Response
Letter from Sierra Club – October 26, 2020	
We concur and support the Sept 2, 2020 letter from Marin Conservation League	Comment noted. The City received MCL’s comments on the May 2020 Draft Goals, Policies, and Programs on September 2 (the City had a “soft” deadline of June 30 for comments). By September, much of General Plan 2040 had been drafted. Staff was able to incorporate MCL’s suggested edits into all elements except Land Use. We will review the proposed edits to the Land Use Element and recommend appropriate changes to the Planning Commission.
We agree that a glossary of terms and requested updated maps (ephemeral creeks, areas dominated by invasive species, areas impacted by rising groundwater) are provided before the document is approved.	A glossary will be prepared—it is not part of the adopted document and may be prepared closer to Plan Adoption. Intermittent creeks will be added to Figure 6-2. Adding ephemeral creeks at the 8.5 x 11 scale would make the map unreadable. However, this information is available through GIS and will be referenced in the text. We will investigate the other requested maps.
We especially draw your attention to MCL’s observation that many of the policies and programs are passively stated and use words like “consider”, “recognize” and “explore” rather than action-oriented or mandatory verbs. Setting lofty goals is important; setting a direction to attain them is also critical.	Specific proposals for changing “should” to “shall” are being considered on a case by case basis. Flexibility is an essential part of the General Plan, and staff has been intentional in its choice of verbs and auxiliary verbs in order to balance competing objectives.
If environmental planning does not happen at the same time and with the same priority as transportation, housing or commercial development, we fear it will be relegated to the back burner, as has happened so often before. With COVID, wildfires, drought, sea level rise and climate change all clearly having an environmental component based on our collective human actions, it is critical that the environment receives more than just a seat at the table. The environment needs a strong voice at every level for every project, or we will have even more serious repercussions threatening humanity and the world.	Comment noted. The Draft General Plan substantially expands policy direction and implementing programs on resource conservation, climate change, hazard mitigation, and protection of the environment.
Letter from San Rafael Heritage – October 25, 2020	
San Rafael Heritage intends to submit more specific comments prior to the Dec 15 Planning Commission meeting.	Comment noted.
1) The San Rafael Historical/Architectural Survey was not completed in 1986. Only brief additions were made in that year. The true completion year is 1978, almost a decade earlier.	Comment noted; the text will be edited accordingly.
2) The Inventory Update goal cited in CDP-5.2B has long been important to San Rafael Heritage. We stand ready to assist city staff in reaching this goal with the knowledge and experience we can bring to the effort.	Comment noted.

Comment	Response
<p>3) We strongly encourage the City of San Rafael to adopt a particular menu of historic preservation incentives, such as transfer of development rights, Mills Acts contracts and façade easements, which can be used to create historic investment tax credits and local property tax reduction. Perhaps a preservation expert can be hired to consult with city staff on this issue. Again, SRH can help with this effort.</p>	<p>The Downtown Precise Plan includes such a program. This provides a potential template for broader application on a citywide basis in the future.</p>
<p>4) The mission of SR Heritage is for historic preservation to become ingrained into our City's identity as a widely held community value. The GP2040 can help this goal be achieved.</p>	<p>Comment noted. This goal is supported by General Plan 2040.</p>
<p>5) We recognize and support our city's desire to evolve with architecture reflecting different eras of our city's history. This will include the architecture of our time as well as that of future generations, so that San Rafael can continue to be the great and dynamic small city that it is.</p>	<p>Comment noted. This goal is supported by General Plan 2040.</p>
<p>Letter from Terra Linda Homeowners Association – October 24, 2020</p>	
<p>Land Use Element – page 3-3 to 3-5: Land Use Planning Concepts (p. 3-4). Acknowledge the inherent conflicts between promoting change and preserving the essential character of neighborhoods. When do infill and adjacent new development change the nature of a suburban neighborhood to that of a semi-urban or urban neighborhood? Is this how the City intends suburban neighborhoods to change? If the life quality of suburban neighborhoods is to be preserved, how can this be done? What safeguards, restrictions, density limits or alternative land use policies are needed? These questions deserve serious discussion, in and perhaps in addition to the purview of San Rafael's General Plan. San Rafael residents deserve clear answers about the impacts of the City's intentions. The land use concepts on these pages need to address parameters for neighborhood conversation for increased housing and growth.</p>	<p>All comments are noted. The intent of this section is to provide a high-level overview of the concepts that guide long-range land use planning in San Rafael. Neighborhood Conservation is one of the concepts listed and is acknowledged as essential to the City's future. The Growth Management is also focused on maintaining the quality of life in the City. We will add text to the Neighborhood Conservation section (P 3-5) acknowledging the inherent tension between change and preservation, and the importance of zoning, design standards, and development review processes as tools for ensuring land use compatibility. The policies throughout this Element—and in the Neighborhoods Element that follows it—document how balance will be achieved. The purpose of the forthcoming PDA planning effort is to establish the parameters.</p>
<p>a. For example, <i>“Growth management also means balancing job growth and housing growth and providing housing that meets the needs of the local workforce”</i> should be restated <i>“balancing job growth and housing growth and providing housing that meets the needs of the local workforce compatible with the essential character of existing neighborhoods.”</i></p>	<p>The compatibility of housing with existing neighborhoods will be addressed in the text added to the “Neighborhoods Conservation” section on the facing page. Compatibility is the major focus of the Land Use Element, the Neighborhoods Element, and the Community Design and Preservation Element.</p>
<p>b. Including wording such as that in CDP4.3 “new development respects the character-defining elements of neighborhoods, including height, scale, materials, and setbacks.”</p>	<p>See comment above. We will add language on the importance of preserving character-defining features to the text on page 3-5.</p>
<p>c. Re-use of existing commercial buildings (such as underutilized office buildings) for housing should also receive emphasis in these concepts as this is less disruptive to surrounding neighborhoods.</p>	<p>This concept is fully supported by the Land Use Element. Most of the development potential in North San Rafael is associated with commercial and office sites.</p>

Comment	Response
<p>P 3-3. Transit-Oriented Development Concept needs further adaptation to acknowledge that, while TOD may provide benefits in Downtown San Rafael with its “robust network of buses” and SMART train station, TOD may have limited application in suburban neighborhoods, such as North San Rafael, where bus and train service is minimal and automobiles will continue to be primary mode of transportation for much of projected time frame of GP2040.</p>	<p>The text acknowledges that a more limited version of TOD is appropriate for North San Rafael. This is reinforced by the Land Use Map and is also repeated in other parts the General Plan, including the Neighborhoods Element.</p>
<p>Omit the words “the suburban context” in the first sentence: “The 2040 Plan adapts the concept of “transit-oriented development” (or “TOD”) to the suburban context of San Rafael.”</p>	<p>We will omit the word “suburban” so the statement simply reads “to the context of San Rafael.”</p>
<p>Land Use Element Policy LU 1.3 -- Land Use and Climate Change. Relying on Transit-Oriented Development to be decrease auto emissions ignores the fact that emissions from idling cars produce more emissions. The potential for increased congestion must be factored into TOD plans, especially where there is minimal transit service. We endorse Marin Conservation League’s additions to the following policies.</p> <p>Policy LU 1.3 -- Land Use and Climate Change “Focus future housing and commercial development in areas where alternatives to driving <i>and minimal increase in traffic congestion</i> are most viable and shorter trip lengths are possible, especially around transit stations, near services, and on sites with frequent bus service.”</p> <p>Policy LU 1.3A -- Land Use and Climate Change. This should include data on modes of travel, trip origins and destinations, trip lengths, vehicle ownership, <i>traffic congestion and duration of idling traffic</i>, greenhouse gas emissions, and other metrics in areas that are well served by transit.</p>	<p>All comments are noted. The General Plan acknowledges that North San Rafael should be treated differently from Downtown San Rafael in the General Plan for the reasons cited here. It acknowledges that the Civic Center is less well suited for higher densities. It also calls for bus improvements, first/last-mile connections to SMART, bikeshare, better pedestrian connections, etc. to improve transit use and provide alternatives to driving.</p> <p>The requested edit to Program LU-1.3A will be made. The issue of emissions from idling cars is also addressed in the Mobility Element.</p>
<p>Land Use Element – Land Use Element/Public and Open Space Categories (p. 3-14/pdf 58)</p> <p>Descriptions of the “Parks, Recreation, and Open Space” and “Conservation” are very human-centric. Besides being natural resources for human use, these areas are also home to multiple species of non-human residents. Preservation and enhancement of habitat and of wildlife corridors should be high priority uses in these land use categories. Careful management of wildlife-human interface should be an important part of all land use policies.</p>	<p>Definition of “Parks, Rec, and Open Space” and “Conservation” will be edited to note the presence of wildlife and importance of habitat preservation.</p>
<p>Land Use Element Goal LU-1: We endorse the MCL recommendation to add “<i>Protecting environmental quality will be an objective in land use planning</i>”</p>	<p>The importance of environmental protection will be added to the narrative italics text underneath the main goal statement.</p>
<p>Mobility Element Goal M-1: Add “<i>Protecting environmental quality will be an objective in planning transportation projects</i>”.</p>	<p>This is best addressed by Goal M-5, which focuses on the potential adverse effects of transportation on the neighborhoods. Appropriate text will be added here.</p>

Comment	Response
<p>Mobility Element Goal M-3: Edit to read <i>“Protect environmental quality by coordinating transportation and land use decisions in ways that reduce greenhouse gas emissions, air pollutants, noise, pollution from stormwater runoff and other environmental impacts related to transportation.”</i></p>	<p>The importance of protecting environmental quality will be expressed in an edit to the italicized text underneath the goal.</p>
<p>Policy LU-1.9 Clustering – We endorse MCL’s recommendation to add <i>“Encourage wildlife corridors and habitat preservation in areas where adjacent properties share environmentally sensitive areas.”</i></p>	<p>The potential for clustered development to improve wildlife corridors will be noted through an edit to this policy. Opportunities for clustering are more limited now than when this policy was drafted 20+ years ago.</p>
<p>Policy LU-2.8 Senior and Disabled Care Facilities The impacts of senior facilities and disabled care facilities are not equivalent and it is not right to lump them together. There is a legitimate question of how many group homes can be accommodated in residential neighborhoods before the neighborhoods begin to feel more “institutional” than “residential.” The City needs to give consideration to the impacts of excessive numbers of group homes. Edit Policy LU-2.8 to state <i>“Accommodate Encourage facilities and services to meet the needs of older and disabled residents, including senior housing, assisted living, and convalescent care facilities; ...”</i> Add: <i>“Encourage community participation and dialogue in development and location of these facilities”</i></p>	<p>Both edits will be made as proposed. The words “To the extent permitted by law” will be added to the second sentence, as the City’s ability to regulate small group homes is limited by the State.</p>
<p>Policy LU-3.2 (New Development in Residential Neighborhoods) should apply to redevelopment and remodeling projects as well as new development. recommend that this policy be re-titled “New Development and Redevelopment in Residential Neighborhoods” b. Add: <i>“Minimize reduction of views, privacy and solar access for neighboring properties.”</i> c. Add: <i>“Encourage wildlife corridors and habitat preservation in areas where adjacent properties share environmentally sensitive areas.”</i></p>	<p>See earlier response to Responsible Growth in Marin (RGM) comment on this policy. Second sentence will be edited to read “New development and redevelopment should:” Also, change “b” suggested by TLHA will be made. Change “c” is addressed by policies in Chapter 6.</p>
<p>Policy LU-3.7 On-Street Parking. Same comment on this Policy as RGM.</p>	<p>See earlier response to RGM on this policy.</p>
<p>Policy LU-3.9A Neighborhood-Serving Uses. Please add <i>“hardware & household maintenance, household goods, grocery stores, dry-cleaning, hair salons, postal & telecommunications services,”</i> to the examples of Neighborhood Serving Uses.</p>	<p>Will add these uses</p>
<p>Neighborhoods Element Policy NH-4.2 on Northgate Mall—delete reference to expanding the Mall in (e) and delete Clause (j).</p>	<p>Changes made. See earlier response to RGM</p>
<p>Policy NH 4.7A [Terra Linda] Community Improvements. Add the following: <i>g) Collaborate with Miller Creek School District and San Rafael School District to create additional public recreation</i></p>	<p>Will make these additions.</p>

Comment	Response
<p><i>opportunities at underutilized sports fields, such as those at Santa Margarita Elementary School.</i></p> <p><i>h) Encourage safety improvement to infrastructure, including moving overhead power and communications lines underground along Freitas Parkway and Del Ganado Road, and throughout the Terra Linda neighborhoods as opportunities emerge.</i></p>	
<p>Policy NH 4.8A Beautification and Restoration Projects. Change the wording of Program item (c) to better reflect the intent. “Pursue the following beautification and restoration projects in Terra Linda: <i>c) Improvements to toward restoring the hydrologic function of Santa Margarita Creek, including possible removal of concrete channel bottom and expansion of planting area for successful tree planting.</i> Tree canopies will help to lower water temperatures and protect water quality.”</p>	Requested clarification will be added.
<p>P 4-58 Neighborhoods Element: The narrative description of Terra Linda should be expanded with more context and detailed information, similar to the level of detail of smaller neighborhoods in Central San Rafael and Downtown. (text provided by TLHA)</p>	Staff will integrate as much of the new text as possible to reflect the additional information provided.
<p>Conservation and Climate Change Element. Add a policy and program items to create a Wildlife and Ecosystem Master Plan in collaboration with County, State, private landowners, and other stakeholders.</p>	See earlier response to Shirley Fischer comment on this subject.
<p>Add a Conservation Element policy and program items for managing the Wildlife-Human Interface.</p>	See earlier response to Shirley Fischer comment on this subject.
<p>Description of wetlands on P 6-6 should acknowledge the importance of adjacent uplands as refuge for wetland species. Upland areas adjacent to wetland areas should remain undeveloped.</p>	See earlier response to Shirley Fischer comment on this subject.
<p>Policy C-2.3: Improving Air Quality Through Land Use and Transportation Choices. Prolonged idling traffic can cause increased greenhouse gas emissions. This should be acknowledged in Policy C2.3 by the following insertion: “Implement land use and transportation policies, supportable by objective data, to reduce the number and length of car trips, improve alternatives to driving, <i>reduce traffic congestion and vehicle idling,</i> and support the shift to electric and cleaner-fuel vehicles.</p>	“Reduce vehicle idling” will be added to the second sentence of Policy C-2.3
<p>Typo: Eliminate repeated para. on P 4-55</p>	This will be corrected
<p>P 4-58 correction: Change “Marin Health Surgery Center” to “Marin <i>Specialty</i> Surgical Center”</p>	Change will be made
<p>Community Design and Preservation Element. The Gateways discussion on P 5-5 should recognize the two SMART stations as important entryways.</p>	Text on P 5-5 will be added to make this acknowledgment and Figure 5-2 will be edited to show the stations as gateways.
<p>Parks, Rec and Open Space. P 7-6, add Terra Linda Community Garden as a Special Use Park</p>	Will add to Table 7-1 and Figure 7-1

Comment	Response
Letters Regarding Redwood Tree Preservation – Oct 26 and 27, 2020	
<p>Emails were received from the following individuals: Steve Thomson, Maren DeGraff, Tom Heinz, Stacy Clement, Susan Bradford, Diane McCurdy, Kamila Harkavy, David Mitchell, Michael Burch, Laurene Schlosser, Sue Burrell. Several of the letters referenced tree removal proposed for 52/ 54 Fremont Street. All of the letters urged the City to recognize the benefits of redwood trees for people, wildlife and the environment. Several letters requested that the following language be added to the Conservation and Climate Change Element or the Community Design and Preservation Element:</p> <p><i>Protect and preserve Redwood trees over 12 inches in diameter. San Rafael is a tree city and the Redwood tree is the California State Tree, designated by the State Legislature in 1937. Redwood trees absorb water run-off, combat climate change by absorbing carbon and provide shade in the summer months. Redwood trees beautify our neighborhoods. Prohibit the removal of California Redwood Trees over 12" diameter.</i></p>	<p>Draft Program C-1.16C currently provides the following language on tree preservation:</p> <p><i>“Consider ordinances and standards that limit the removal of trees of a certain size and require replacement when trees must be removed.”</i></p> <p>Establishing the specific diameter of protected trees is beyond the scope of a General Plan. As an implementing action, the language proposed by the commenters would require a community process, consultation with Fire and Public Works, and extensive notification and engagement of property owners. However, the General Plan could include more proactive language in lieu of Program C-1.16C. Rather than “considering” ordinances, the Program could state more affirmatively: <i>“Revise the City’s tree regulations to identify protected trees on private property and establish required procedures and permit requirements for tree removal and protection. The regulations should strongly support the protection of California redwoods and other native trees”</i></p>
Letter From Hillside Neighbors (Victoria DeWitt) – Oct 26, 2020	
<p>Chapter 3. Land Use Element. APN 12-041-13 is a vacant lot at the end of Fremont Road that is the site of landslides and mudslides over the years. This lot is unbuildable and should be zoned as “conservation.”</p>	<p>Comment noted. The General Plan Land Use Map is a generalized depiction of future land uses in Year 2040 and it would not be to appropriate to assign a Conservation designation to an individual, privately-owned residentially zoned lot.</p>
<p>pg 4-15. ADD: The West End Village marks the western entrance to downtown San Rafael and includes attractive signage and landscaping to welcome vehicles, bicyclists and pedestrians.</p>	<p>Requested sentence will be added (following the first sentence of the paragraph)</p>
<p>Pg 4-18- Correct typo in third para., third sentence</p>	<p>The word “is” is missing and will be added</p>
<p>Edit Policy NH-2.2: Miracle Mile West End Circulation Improve circulation, provisions for cross-traffic and “U-turn” movements, bicycle and pedestrian safety, and traffic controls along Fourth Street <u>Second Street and the Miracle Mile</u>, especially at intersections with side streets.</p>	<p>Edits are acceptable and will be included.</p>
<p>Replace NH-2.2A with a more complete list of local circulation priorities: <u>Program NH-2.2A: Neighborhood Circulation Concepts.</u> <i>Pursue the following circulation improvements in the West End Neighborhood.</i></p>	<p>The Second Street improvements will be grouped together (b, c, d, and e) and will be added as a single item. Lettered item (f) will be added.</p>

Comment	Response
<p><u>a) Reconfigure the traffic signal at Fourth Street and Ross Valley Drive intersection to incorporate Santa Margarita Drive, thereby improving safety.</u></p> <p><u>b) Implement plan to improve safety at the complicated and dangerous pedestrian/bicycle crossing at Marquard/West End/2nd Street/Third Street/Fourth Street crosswalk.</u></p> <p><u>c) Improve pedestrian/bicycle safety at 2nd Street/East Street intersection crosswalk.</u></p> <p><u>d) Widen sidewalk along south side of Second Street from East Street to Miramar Avenue to improve safety for pedestrians walking next to fast moving traffic.</u></p> <p><u>e) Install a concrete sidewalk to replace the dirt path along one block of Second Street from Hayes Street to Shaver Street.</u></p> <p><u>f) Complete Grove Hill Estates public pedestrian path along the easement created in 1983 to connect Tamal Vista Drive to the Sun Valley neighborhood.</u></p>	
<p>Add the following programs</p> <p><u>Program NH-2.4A. Emergency response time. Require emergency, fire or EMS services that meets NFPA Standard 1710 response time criteria for all new development.</u></p> <p><u>Program NH-2.4B. Fire Apparatus Access. Require CFC turning radius provisions to accommodate the turning around of fire apparatus, as required by CFC Appendix D, for all new development.</u></p>	<p>Specifications for emergency response time and fire apparatus access standards would not be appropriate in the Neighborhoods Element since these are citywide issues. Staff will consult with Fire Dept on appropriate language—suggested alternative language is included in response to Victoria’s 11/12/20 letter. References to compliance with mandated State and National Codes are not typically restated in local Plans.</p>
<p>Add a program in Chapter 5 (under CDP-3.6) to protect and preserve redwoods over 12” in diameter.</p>	<p>See earlier responses to tree preservation letters above.</p>
<p><u>Edit Program CDP-4.2A (Improving Design Review Efficiency by adding two new bulleted items:</u> <u>Continue to improve the design review process by:</u></p> <ul style="list-style-type: none"> • <u>Engaging stakeholders and the developer early so that issues can be worked out before initial submittal</u> • <u>Clarifying requirements for initial submittals to improve their quality</u> • <u>Continue to require all necessary reports, including geotechnical, grading, and survey, prior to review of hillside development</u> • <u>Adjusting notification procedures to encourage earlier and broader participation</u> • <u>Changing the project review sequence so that Planning Commission feedback is solicited before the Design Review Board for specific projects.</u> • <u>Continue to involve the community with their written comments and public participation in the design review process.</u> • <u>Periodically evaluating and updating the guidelines, including thresholds for design review.</u> 	<p>The proposed new third bullet will be merged into the second bullet. The second bullet currently references requirements for initial submittal and can be expanded. The proposed sixth bullet will be shortened and added.</p>
<p><u>Add Program C-1.16C to protect redwood trees over 12” diameter.</u></p>	<p>See earlier responses on this topic.</p>

Comment	Response
In Parks, Rec, and Open Space Element, add <u>Program PROS-3.8C: New Neighborhood Trails</u> . <i>As part of the development process, consider including public pedestrian easements to create new trails connecting residential areas and providing alternative walkable routes.</i>	This is addressed in M-6.4A: Urban Trails Master Plan. One of the main objectives of this Plan is to support new pedestrian easements that connect residential areas. We will include a cross-reference to this program after Program PROS-3.8B
In Parks, Rec, and Open Space Element, add <u>Program PROS-3.8D: Complete trails previously acquired</u> . <i>For trails that have already acquired an easement, such as the Grove Hills Estate public pedestrian easement that connects the West End neighborhood to Sun Valley, appropriate funding necessary to complete or construct the trail.</i>	See response above. Completion of the Grove Hills Estate pedestrian trail is being added to the West End transportation improvements program. (NH-2.2A)
Safety Element. Policy S-1.2: Location of Future Development , add “slope stability” to list of considerations.	Will add slope stability.
Safety Element, Program S-1.2B: Add “adequately” to second sentence (<u>adequately</u> mitigated)	This edit will be included.
Safety Element Goal 2: Add mudslides to the list	Will add mudslides.
P 8-5: Modify 1st paragraph under Goal: The potential for hazards can <u>may</u> be reduced through engineering and special construction methods.	This edit will be included.
Last paragraph on page 8-6, the following sentence needs to be corrected – which is it, “may be required” or “are required”	“may be required”. This will be corrected
The photo of a partially collapsed home on page 8-9 is from a landslide/mudslide so would be more appropriately placed with the preceding discussion on landslides, not immediately above the section for Earthquakes, Policy S-2-3.	Figure 8-1 will be moved back to P 8-7 so that the photo immediately follows the policy on landslides and is on the same two-page spread.
In order to adequately review the geotechnical portion of the Safety Element, it would be helpful to have Appendix F included with Chapter 8 for review.	Appendix F is available here . It is unchanged from General Plan 2020.
Edit Program S-2.1B: Geotechnical Review as follows: Continue to require geotechnical studies and peer review for proposed development as set forth in the City’s Geotechnical Review Matrix (See Appendix F and text box at right). Such studies <u>shall be considered in conjunction with development review</u> and should determine the extent of geotechnical hazards, optimum design for structures, and the <u>feasibility and suitability of a</u> proposed development for its location, the need for special structural requirements, and measures to mitigate any identified hazards.	No changes to policy proposed. The policy addresses the issues of concern as currently written.
Letter From Victoria DeWitt – Nov 12, 2020	
Mobility Element p 10-25, please add 2 programs, the first requiring all Fire/EMS services to meet NFPA 1710 response time criteria and the second requiring conformance with CA Fire Code turning radius for emergency vehicles. See earlier letter re: West End.	See proposed edit to Program CSI-3.2B below. Staff will consult with Fire Dept for further edits. References to mandatory State and National Codes do not need to be restated in the Plan. The focus is on “ensuring adequate emergency access”, as stated.

Comment	Response
Mobility Element Policy M-2.9: Add reference to adequate fire apparatus turn-arounds and street parking.	The Policy already references adequate access for emergency and service vehicles. Street parking will be added.
Mobility Element Policy M-6.1: Add “public stairways, pathways, and trails” to the policy on encouraging walking.	We will add pathways and trails. Stairways are not possible in many areas due to topography.
Mobility Element Policy M-6.3: Edit to read “Develop pedestrian and bicycle networks that connect residents and visitors to major activity and shopping centers, existing and planned transit, and schools, <u>and other neighborhoods</u> ”	This edit will be included.
Mobility Element Program M-6.3A: Add new bullet to complete the Tamal Vista path	This has been added to the Neighborhoods Element. The projects in the M-6.3A are much larger in scope.
Mobility Element Policy M-7.4: Qualify policy so it only applies Downtown.	No change proposed. Using technology to improve parking efficiency (e.g., available space counters in garages, mechanical lifts, etc.) is a citywide objective.
Mobility Element Program M-7.3A: Qualify program so it only applies to large parking structures.	No change proposed. Technology improvements can also work in smaller parking structures, for special event parking, on-street parking, etc. as well as for parking enforcement.
Community Services Policy CSI-3.2: Engage the Police and Fire Depts in the review of proposed development and building applications to ensure that public <u>health and safety</u> , fire prevention, and emergency access and response needs are considered and effectively addressed. <u>times meet current industry standards and guidelines.</u>	Will add “health” to third line as shown. Last sentence should remain as is—industry standards are addressed in CSI-3.2B below
Program CSI-3.2B: Emergency Response Time. Use the development review process to identify appropriate measures to reduce fire hazards and ensure adequate emergency, response capacity, fire and EMS response times meet the minimum criteria established by NFPA Standard 1710	Suggest alternate rewording that also responds to earlier comments in this letter regarding and the 10/27 letter: “Use the development review process to identify appropriate measures to reduce fire hazards and ensure <u>adequate emergency response capacity that is consistent with National Fire Protection Association standards.</u> ”
Edit Policy CSI-4.2 as follows: As part of the development review process, require applicants to demonstrate that their projects can be adequately served by the City’s infrastructure, <u>including fire and emergency vehicle access.</u> All new infrastructure shall be planned and designed to meet the engineering <u>and safety standards</u> of the City and <u>as well as</u> various local service and utility providers.	Fire and emergency vehicle access is addressed elsewhere in the Plan. This policy is specifically focused on water, sewer, and drainage. Safety will be added to second sentence per the comment.
Edit Policy CSI-4.7: strike the existing street maintenance policy and replace with a more detailed program indicating operational procedures for street sweeping (suggested wording provided in letter).	No change. This is intended as a broad policy expressing the city’s commitment to maintaining its streets.

Comment	Response
Program CSI-4.7A (Pavement Management) Replace proposed language with administrative guidelines for implementing the pavement management program. (suggested wording provided in letter) relating to pavement condition index rating system	We have forwarded this recommendation to Public Works for their consideration. It could be incorporated as an operating procedure or DPW protocol but is too detailed and prescriptive for the General Plan.
Policy CSI-5.6: Add pedestrian pathways as an example of a community benefit.	This edit will be made.
Economic Vitality Policy EV-3.8: Edit as follows: Encourage creative infill development and redevelopment that maximizes existing resources, <u>minimizes negative impacts on surrounding properties</u> and makes the best use of limited available space, <u>while respecting development patterns in established neighborhoods</u> . Expedite the development review process by establishing clear expectations for design, and effectively involving the community.	No changes recommended. The proposed additions would duplicate earlier policies in the Land Use, Neighborhoods, and Community Design Element which already address land use compatibility. Those policies can be cross-referenced here.
Edit Economic Vitality Program EV-3.8C: Pre-Submittal Process as follows: Improve the efficiency and speed of the development review process by <u>updating departmental procedures, revisiting</u> neighborhood notification and meeting procedures. and updating the pre-submittal process to identify <u>Identify</u> initial concerns and encourage higher quality applications.	The focus of this program is on improving efficiency and speed, so the proposed changes would not work. We will develop alternate wording that does not imply a reduction in notification or meeting procedures.
Equity Diversity Inclusion Goal EDI-1. Edit narrative to add the word “inclusive” to second sentence.	This edit will be made.
Chapters 13 and 14 – misc. typos and font kerning issues are highlighted	All of the listed corrections will be made.
Letter From Responsible Growth in Marin – Nov 12, 2020 (all comments are on Mobility EI)	
RGM endorses the element’s acknowledgment of the city’s mobility circumstances, the need for both LOS and VMT, the negative impacts of congestion, the connection between GHG and congestion, and the commitment to develop LOS and VMT guidelines.	All comments noted
P 10-1, the Element implies that post-COVID traffic will resemble pre-COVID traffic. It is too soon to draw this conclusion.	Text on P 10-1 will be edited to reflect this point. None of the regional agencies have addressed this issue in their planning yet, but it is important.
P 10-4, In light of recent trends, the forecast of 2 million more residents by 2040 seems dubious.	We will note that these are pre-COVID forecasts (the more recent Plan Bay Area 2050 forecasts are showing even higher population growth PBA 2040)
P 10-5 and 6. Acknowledge the limitations of the demographic data cited—it may not reflected undocumented residents, and recent out-migration.	We will explain these limitations in the text.
P 10-27, text box on VMT implies that more dispersed employment yields more VMT. This may not be true if there is more telecommuting.	Will edit text accordingly.

Comment	Response
Program M-2.3A: Ultimately, cost benefit analysis will be a qualitative discussion since benefits are hard to quantify.	Comment noted. This was a major area of discussion by the GP 2040 Steering Committee—the major take-away was that there should be public discussion on this issue as capital projects were being prioritized.
Program M-3.2B and C (VMT thresholds and mitigation measures)—what is the timeframe?	The City Council accepted staff’s recommended VMT thresholds in July 2020. These will be periodically revisited. Mitigation measures (TDM) will be included in the City’s VMT methodology guidelines now being prepared and should be available in Spring 2021 before the General Plan is adopted
Program M-3.2B: Should the City adopt the 15% below regional average recommended by OPR?	This is more or less what has been recommended. Here’s a link to the staff report .
Program M-3.3D: Note that peak hours have shifted, which should be considered when conducting traffic studies and implementing TDM measures.	Comment noted.
Policy M-2.5D: change “may” to “shall”	“May” is the more appropriate term in this instance since there may be Downtown projects (bike lanes, plazas, street closures, etc.) that are not subject to this requirement.
P 10-21, paragraph 3. Change the “should” to “shall” in both instances. (preparing TIS guidelines and including metrics for evaluating roads below accepted LOS)	Both of these changes are acceptable and will be included.
Program M-2.5C: change “may” to “shall” (The City Traffic Engineer <i>may</i> develop recommendations to improve operations, etc.)	“May” is the more appropriate term since this is a discretionary action that depends on the outcome of the analysis
Table 10-1: Suggest adding alternate approaches for North San Rafael improvements in the event the PDA is not funded.	Citing these measures as dependent on the PDA designation is important to demonstrate the need for funding to ABAG/MTC and TAM. The North San Rafael and SE/Canal Area Plans are among the General Plan’s highest priorities.
Program M-2.8A should include a due date/ timeframe	This will be included in the Implementation Appendix.
Policy M-2.10 (sea level rise adaptation planning) should include a due date/ timeframe	This is covered in the Safety Element. Pursuit of funding is underway. This is a very high priority item.
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.	This report is currently being prepared and will be available in early 2021
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?	San Rafael 2019 Climate Change Action Plan, Figure 1 (page 4). It is based on the City’s 2016 emissions inventory.
ME, p. 10-27: VMT Explained, third paragraph: Are the data available for everyone free of cost or for purchase only?	We will check with our traffic consultant. There is likely a fee for the data.

Comment	Response
ME, p. 10-27: VMT Explained, fifth paragraph: Data are five years old and may no longer be representative.	Comment noted. Staff will try to secure more current data.
ME, p. 10-29: How is the efficiency of TDM measures monitored and what is the success rate so far?	It varies from community to community. Here is a link to USDOT data on this subject.
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?	This is American Community Survey data and is based on residents counted by the Census.
Policy M-7.6 addresses existing parking shortages but does not address the potential for future parking shortages resulting from new development. A reality check is needed to determine how reductions in on-site parking requirements will affect nearby neighborhoods. There should be an acknowledgment that all neighborhoods need sufficient parking.	Policy M-7.6 will be revised. See responses to earlier RGM comments on this policy.
P 10-1, 4 th para. should acknowledge “reducing congestion” as one of the ways to reduce GHG emissions	This is debatable, unless strongly qualified. To the extent that reduced congestion is associated with from fewer trips, this is true. But reduced congestion resulting from larger roads and increased lane capacity would increase GHG—this was the motivation for SB 743 and the prohibition on using LOS in CEQA.
P. 10-6 —add a pie chart showing where San Rafael residents go to work	We can add this, based on the same data used to create the other pie charts.
Program M-2.5A: Edit to note how projects that cause negative impacts will be identified in the City’s Traffic Impact Study Guidelines.	The guidelines will likely be finished before the General Plan is adopted, so this program will be rewritten to call for periodic updates. The RGM comments will be considered in the revision.
ME, p. 10-23, Table 10-1, 2E: “... while maintaining high quality transit route along 4 th Street...” Why not consider a pedestrian zone along 4 th Street?	This is addressed in detail by the Precise Plan. Continued temporary closures (for street dining, etc.) and other pilot pedestrian projects may be considered, but 4 th remains the primary transit spine of Downtown.
ME, p. 10-30, Policy M-3.4B: What role would, or could the City play here? (roommate matching programs)	The City’s Economic Development Department could facilitate such a program in cooperation with non-profit or private partners. Several San Mateo County cities have done this with HIP Housing.
ME, p. 10-34: “Program M-4.2B: Rail Service.” Why enshrine support for an ineffective transportation mode into the General Plan?	Rail service remains part of the regional transportation vision and long-range 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.)	High water table and flooding make this approach less viable. However, it can be added to the program as something to be considered in the future.

Comment	Response
<p>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.</p>	<p>This edit will be made.</p>
<p>ME, p. 10-9: "The trains provide an important commute option..." We question the veracity of this statement and request support.</p>	<p>Will delete the word "important"</p>
<p>ME, 10-9: should also mention "Sonoma Airport."</p>	<p>Charles M Schulz Sonoma County Airport will be mentioned (along with OAK and SFO)</p>
<p>ME, p. 10-13: Last sentence in blue section should also mention handicap accessibility.</p>	<p>Access for persons with disabilities will be added to the description of Complete Streets in this sentence.</p>
<p>Three minor typos are noted</p>	<p>These will be corrected.</p>
<p>ME, P 10-37—should the reference to the Civic Station Area Plan be to the North San Rafael PDA?</p>	<p>The reference is correct as stated.</p>

ATTACHMENT 2:

General Plan 2040 Planning Commission Comments and Responses (as of 12/10/20)

Comment	Response
GLOBAL COMMENTS	
Would like to see more direction on the actionable items that need to occur in relation to the policies	This is being addressed through the Implementation Appendices now being developed (see example in Attachment 4).
There are thematic items in the plan that are connected. How do we identify and build on these connections?	This will be addressed in a number of ways: (1) When we discuss the “forces driving change” in Chapter 2, we will identify the Elements(s) in which each topic is discussed; (2) we will add a chart to Chapter 1 indicating the other Plans that flow from the General Plan; (3) we will prepare a General Plan Index in the future that helps the reader navigate the document and see where various topics are addressed; (4) see later comment on “Call for Action”.
How does the Plan influence decisions on 101/ 580, since they are under state control?	While State agencies are not governed by the Plan directly, they consult the Plan to evaluate the consistency of their actions. The General Plan also provides a platform for the City to engage with these agencies.
How did you select which directives are framed as mandatory (shall) and advisory (should)?	There was a strategic process, including the Steering Committee, to determine the appropriate verb (or auxiliary verb) for each policy. The choice is based on factors such as state law, code requirements, health and safety, CEQA compliance, economic factors, etc. The Plan sets forth competing objectives which require flexibility in many policies and balancing of priorities. See General Plan 2040 Page 1-5 for further explanation.
There aren’t many metrics to measure success in the General Plan. Tangible metrics would help define our progress and clarify what we’re aiming for.	We will be adding metrics for each Element to the Implementation Appendix. There are measurable objectives throughout the Plan but they are not explicitly highlighted. Overall, the General Plan is intended as a broad policy framework rather than a Strategic Plan or “dashboard” – but Staff acknowledges the value of having key benchmarks to monitor progress.
(in response to public comment): I support the statement that we should acknowledge that we are occupying Miwok land and should be good stewards.	Comment noted.
Some of the public comment calls for very prescriptive changes that seem out of place in a General Plan (on home renovations, etc). How do you respond to those comments?	It depends on the comment and whether it is consistent with other General Plan policies and Steering Committee direction. In some cases, the feedback may be used to help inform future plans that are more detailed, such as the PDA plans.

Comment	Response
(From 11/12): At the first meeting, the Commission discussed how we might develop objective standards related to economic vitality. What kind of format works best for providing comments and ideas? We still need more discussion about what kind of job growth we envision, what our targets are, what will replace retail, and so on.	Staff welcomes Commission input on possible standards and ideas, either submitted in writing or provided through discussion at hearings. Per responses above, we are developing potential Plan metrics and implementation matrices, as well as a Call for Action regarding the City's economic future. Ultimately, the "deep dive" needed to produce economic standards would come from an Economic Development Strategy or strategic plan. These metrics could be incorporated in the General Plan Appendix as they are developed.
I understand the desire for measurable goals, but the GP is intended to be the 30,000 ft view. The goals are ultimately set by the City Council.	Comment noted. We will provide more information on the Annual General Plan and Housing Element Progress reports in Chapter 1, as well as the City Council goal-setting process.
Chapter 1: Introduction	
It would be helpful to identify the other plans that flow from the General Plan, where more specific direction on individual topics is provided.	Staff will develop a diagram showing the various plans in the City and how they relate to the General Plan.
Chapter 2: Framework	
The "Forces Driving Change" discussion (p 2-5 through 2-15) is so significant that it bears mentioning where these issues are addressed later in the document.	Under each of the "forces" described, we will add a reference to where the topic is addressed in the General Plan. There are also background reports on each topic that will be referenced.
This chapter should identify what new and emerging industries will replace the industries that are declining. The Plan should call for an intersectional assembly to identify objective and key results related to the issues addressed throughout this chapter. A call to action should be added regarding this point.	Staff will add a "Call to Action" text box that acknowledges the ramifications of economic changes and other changes for the future, and calls for follow-up steps (such as community summits on the future of the economy, and an economic development strategy)
Address the need for electric vehicle infrastructure throughout the City, and possible impacts of EVs on the distribution system.	This will be added to the Mobility Element, where electric vehicles are discussed.
Does the Plan address high-speed internet and fiber?	Yes, this is in the Community Services and Infrastructure Element.
The pandemic has demonstrated that many of us can work at home and prefer to work at home. How can the General Plan make this more viable? (Another commissioner also noted that we are entering an era of hybrid living and office space, creating new options for places like Northgate Mall)	This is acknowledged in a few places in the Plan, but primarily as a way to reduce greenhouse gas emissions. We will look for ways to add this point in the Land Use Element.
The discussion of demographics should acknowledge historically discriminatory lending practices, covenants, etc. as another factor that kept Marin less diverse in the past. explains pas kept the city white for so long.	This will be added in Chapter 2. It is also addressed in the Equity Diversity and Inclusion Element.
Chapter 3: Land Use Element	

Comment	Response
<p>Much of the Canal and North San Rafael areas will be impacted by Sea Level Rise. Is the City’s intent to rezone other areas to make up for the density and development that we can’t accommodate in those areas?</p>	<p>The General Plan focuses new development outside of the Sea Level Rise overlay area, especially in Downtown and around Northgate. However, it does not propose wholesale relocation of existing communities (or “retreat”). The Plan looks at long-term adaptation and how we can harden vulnerable areas and make them more resilient and flood resistant.</p>
<p>Concur with the approach described by staff, which is to focus on adaptation rather than moving businesses and people out sea level rise areas. There is no cookie cutter solution—different areas need solutions tailored to their conditions. Look to other countries for examples.</p>	<p>Comment noted.</p>
<p>Good to see Form Based Codes (FBCs) referenced in this Plan. Perhaps this can be applied in other areas and discussed elsewhere in the Plan.</p>	<p>Based on Steering Committee discussion, FBCs are only recommended in the Downtown area at this time. The City may consider expanded use of FBCs in the future based on how well it works Downtown.</p>
<p>Objective design standards (e.g., SB 35) are a good example of how policies can be translated into measurable standards. Can we incorporate language in this Element that leads us to similar metrics for other aspects of development—such as impacts on infrastructure, achieving our business goals, etc.?</p>	<p>See earlier response about adding metrics to the Appendix. In general, this is achieved through specific plans (such as the Downtown Precise Plan), system plans (such as the Climate Action Plan), and regulatory documents (zoning, ordinances, etc.)</p>
<p>Program LU-2.10A: Short term rentals. The wording is going in the right direction (Monitor the effectiveness of STR regulations, etc.) but doesn’t really tell us what we’re looking for.</p>	<p>We will tie the program back to the issues addressed in Policy LU-10, including parking, rental housing supply, and neighborhood compatibility.</p>
<p>Consider fleshing out Policy LU-2.12 (encourage innovative housing types) a bit more to address changes to the way we are living and working.</p>	<p>A sentence will be added to the policy to specifically point out how the pandemic has changed the paradigm for living and working. There will be additional community conversations on this topic in 2021-2022 as part of the Housing Element update.</p>
<p>Consider creating an Economic Development body or other review body to strategically understand how the city is changing and how structural changes in our economy, lifestyles, etc. will affect land use and development.</p>	<p>This will be addressed in the Call to Action in Chapter 2 and could be achieved through an Economic Development Strategic Plan or future partnership with the Marin Economic Forum, Chamber of Commerce, etc. – potentially an innovation forum or similar platform to discuss these issues.</p>
<p>Chapter 4: Neighborhoods Element</p>	
<p>(in response to public comment): I concur with the public comment that the General Plan should not pre-determine the outcome of the PDA process. We should not be calling for Mall expansion.</p>	<p>Comment noted. See Attachment 2.</p>
<p>(In response to public comment): While I understand the public’s concerns about the Northgate Mall language, the concept of revenue generation and new housing on the site are not mutually exclusive. Both of these objectives can be accomplished.</p>	<p>Comment noted. See Attachment 2.</p>

Comment	Response
Is the Spanish language survey referenced in the Neighborhoods Element? Can we highlight the need to improve the Canal area?	The survey is discussed in detail in the Equity, Diversity and Inclusion Element. A cross-reference will be added to the Neighborhoods Element "Canal" discussion on Page 4-41 to 4-46.
In the Downtown section of the Neighborhoods Element, can we reference the success of recent street closures for outdoor dining and encourage sustaining this in the future?	Yes. This will be acknowledged.
Chapter 5: Community Design and Preservation Element	
Only one tribal resource is noted on the Historic Resources Map. Are there more? Can we consult with tribal representatives as part of this process?	Disclosure of the location of these resources is limited to protect them from vandalism (we will edit text to explain this). Consultation with tribal representatives has taken place during the General Plan.
Chapter 6: Conservation and Climate Change Element	
Take another look at the suggested language for trees, per the letters received. Some of the language is pushing toward a stronger tree protection ordinance (not just tree replacement), which is appropriate.	Comment noted. See responses to public comment in Attachment 2.
(in response to public comment) I agree with public that we should also limit removal of redwoods over 12"	Comment noted. See response to public comment in Attachment 2.
Reference Countywide greenhouse gas (GHG) reduction goals as well as those in Project Drawdown	We will cite the County of Marin's goals in this chapter as well.
(in response to public comment) We should be careful about being overly prescriptive in our wetland policies. Given the focus of this Plan on sea level rise adaptation, we should not box ourselves in with policies and standards that prevent innovative solutions and approaches.	Comment noted. This will likely be addressed at length during sea level rise adaptation planning. Future General Plan Amendments are possible.
Does the Plan address recent State mandates regarding electric vehicle targets for 2035? How are the infrastructure requirements addressed?	This is covered in the Mobility Element. We will update the text to note recent state targets for 2035. We will also acknowledge the potential impacts of expanded electric vehicle use on the need for electric power and infrastructure.
Is it realistic to include programs for wildlife and ecosystem master plans given all the other priorities?	These are envisioned as longer-term programs and would be completed as funding allows or as grants become available. Including them in the General Plan can help improve the City's eligibility for future grants and other funding sources.
If the Plan EIR identifies additional policies that need to be added as mitigation measures, what's the process for that?	Such policies would be added through a Plan Addendum before the Plan is forwarded to the City Council by the Planning Commission.

Comment	Response
Chapter 7: Parks, Recreation, and Open Space Element	
Is there any way to measure how well we are doing in serving the entire community with park and recreation services? What equity metrics might be included?	The Plan acknowledges the need for more park investment in higher density, lower income areas and calls for a shift in capital improvement and budget priorities to acknowledge this. A Parks Master Plan is needed to quantify neighborhood needs and establish equity metrics for funding.
How do we reconcile the conflicts between hikers and mountain bikers in this Plan?	This would be addressed in a Trails Master Plan or Parks and Open Space Master Plan.
I strongly support the policy calling for more joint use of school grounds for recreation.	Comment noted. This is a major recommendation of the Plan and will be the most effective way to meet recreational needs in many neighborhoods.
Chapter 8: Safety and Resilience Element	
Consider a program to add emergency egress roads in Wildland Urban Interface areas, e.g., some of the West End neighborhood streets do not have sufficient emergency vehicle access.	This is addressed to some extent by Policy S-6.7 but we will add a program to Policy S-4.3 that specifically makes this point. This is also addressed by the City's Wildfire Prevention and Protection Plan. Regarding the West End, Policy NH-2.4 addresses this issue.
The City needs a funding plan to cover expected sea level rise adaptation costs.	Funding will be one of the major topics addressed by the proposed Adaptation Plan.
The Plan's emphasis on community engagement in emergency evacuation and safety plans is important.	Comment noted.
How do these policies relate to enforcement, particularly for fire prevention standards? It is disheartening to develop policies when the standards that implement them are not being enforced.	Comment noted. Enforcement is an operational issue that is not covered by the General Plan, but it is addressed through the annual budgeting process and Fire Department practices and procedures.
Chapter 9: Noise Element	
There's a lot of vehicle-related noise in the West End associated with people gunning their vehicles on Fourth Street.	Comment noted. The City's noise standards are codified in its Noise Ordinance. Compliance with these standards is an enforcement issue.
Chapter 10: Mobility Element	
Program M-3.6A sets a goal that 25% of all vehicles should be zero emissions by 2030. How was that number derived, why was this selected?	This target was adopted as part of the Climate Change Action Plan Update in 2019, based on a public process similar to the General Plan Update. The target was calculated to complement and reinforce the State's target of 5 million zero emission vehicles on the road by 2030.
Program M-3.6A- I support the 25% EV by 2030 goal. Some cities are designating zero emission zones and aiming for zero emission delivery vehicles and taxis.	This would be addressed through the ZEV Plan, as recommended by the Climate Change Action Plan.
Policy M-2.10: Sea Level Rise. Should note that we are working with Caltrans to reduce flooding on 101	Will add Program M-2-10A to work with Caltrans and TAM to address this issue on 101 and 580
Policy M-3.4- Reduce Commute Length. City should zone for restaurants and cafes in neighborhoods, because more people are working from home.	We will add a cross-reference to Land Use Element policies that encourage these uses in neighborhood centers.

Comment	Response
Program M-4.7B- 1 st /last mile-this is a very important program. Each freeway off ramp should be a transit hub. Make sure transit systems are coordinated so people don't have to wait as much.	Will add a cross-reference from Policy M-4.7 to Policy M-5.4 about transit connections at freeway interchanges.
Policy M-5.6 Truck Impacts. Acknowledge that trucks generate diesel particulates that present a conflict with schools, homes, and other sensitive uses.	Policy will be edited to reference diesel particulates
Program M-6.1C CBTP update. Need to redevelop the Canal area in a way that doesn't displace—but rather benefits—the existing population. Think about water taxis in the CBTP update—may benefit more people.	Will add water transportation to this program.
Goal M-7 Parking. Consider EV and e-bike charging stations in this section. Not just for people working there but also shoppers and tourists. And EV infrastructure for homes	M-7.8A addresses the need for additional electric vehicle charging stations. Will expand to address e-bikes and also improved electric vehicle infrastructure in general.
Policy M-7.7: I agree with earlier speakers to make sure that neighborhoods are not negatively affected by overflow parking	See responses to public comments in Attachment 2.
Consider turning 4 th Street into a walking only street	This is addressed in detail in the Downtown Precise Plan
Chapter 11: Community Services and Infrastructure Element	
Acknowledge the importance of private schools and the potential for partnerships, just as we do with public schools.	Will add private schools to Policy CSI-1.1 and Program CSI-1.1B. Policy CSI-6 acknowledges the role of private schools as community partners and resources.
Parkside Childcare Center in Albert Park is a very high demand center—there is a lot of unmet demand. The need for this kind of care is much greater than the supply. Look for sites where we can expand these services for residents.	Will include a cross-reference in this section to Policy EDI-5.1 and Policy PROS-2.4 which address the need for expanded child care.
With respect to libraries, there should be a priority on community spaces that can be rented by various groups (scouts, etc.). There is insufficient space and demand is very high—this is important to facilitate connections amongst our residents.	Will add new Program CSI-3.2C to include additional community space in future libraries and library improvements.
Public Safety/ Fire and EMS. Consider adding a pilot program to provide alternatives to full ambulance response for frequent 9-1-1 users (so that ambulances are used for those most in need). Also consider more on acute mental health needs.	Will consult with Fire Department regarding the need/ feasibility of adding a program like this. It may be better communicated through a document other than the General Plan. Will add cross-reference to Policy EDI-4.6 and acknowledge mental health needs there.
Public Safety. We should ensure that all roads are accessible by Fire and EMS vehicles. Reference CA Code Section 1710.	See responses to public letters (Hillside Neighbors) in Attachment 2. Staff is conferring with the Fire Department to determine if additional language relating to Section 1710 is warranted.
Policy CSI-4.4 Sustainable design. Reference low carbon concrete as an example.	Program C-4.2B references low carbon concrete.
Policy CSI-4.9 and CSI-4.17: mention potential for co-generation and recapture of energy/ bio gas for energy.	Will add reference to waste-to-energy programs to CSI-4.9A and will broaden Program CSI-4.17F to cover waste-to-energy (not just food-to-energy)

Comment	Response
County of Marin is looking at new fire standards for roads. Emergency access should remain on the front burner, as this is a big issue for the community.	Comment noted.
Chapter 12: Arts and Culture Element	
The previous Plan Update (20 years ago) also called for an Arts Commission. The City considered expanding the purview of the Parks and Rec Commission but didn't. We could consider this again.	Given recent budget reductions, staff does not recommend creating new Commissions or expanding existing Commissions at this time. An Arts Master Plan is recommended to identify possible reviewing bodies.
Program AC-1.6C – central performance spaces. Add the Canal area (as well as Downtown and Northgate, which are already mentioned). Also consider these spaces in parks and schoolyards, and possibly add an action to bring electric power to these spaces.	We will edit Program AC-1.6C to address these issues.
I concur with public speakers that an Arts Master Plan and/or decision-making entity is needed to support implementation.	Comment noted
Chapter 13: Economic Vitality Element	
The sector-based breakdown in this element is helpful. There seems to be a disconnect in that much of the focus is on the importance of retail at the same time we say retail is dying. We should shift the focus to how we are going to replace retail. Retail is not our future. It also produces low-wage jobs that aren't consistent with our equity focus and that don't provide the wages need to live in San Rafael. We should think about what businesses can generate revenue and provide opportunities for career ladders and income growth. This can help provide more clarity on decisions to save industrial land, etc. Is there a companion document that will do this?	These are excellent points and they should be addressed in an Economic Development Strategy or citywide Strategic Plan. See earlier comment on the "Call to Action" to have these conversations in the immediate future. It is possible that General Plan Amendments may be developed in the future based on the findings and recommendations.
Policy EV-3.4 on water-dependent businesses. Connect this idea to redevelopment of the Canal to create public amenities like a river walk, new restaurants and businesses, etc. and also link to adaptation planning and anti-displacement.	Policy will be expanded to make this connection, and also to include cross-references to policies about adaptation planning elsewhere in document.
Pandemic conditions make it hard to think about our economic future. Can we adjust these policies as more data about our economy becomes available? This section needs periodic check-ins.	See comment above about Economic Development Strategy. Also, the General Plan can be amended after its adoption and is not set in stone for the next 20 years. Future amendments are likely.
Chapter 14: Equity, Diversity, and Inclusion	
Was there consideration given to providing a stipend for elected positions? That would encourage greater participation among lower income households.	This is a policy matter for Council consideration and would not be addressed by the General Plan. Program EDI-1.3.B acknowledges that stipends can help improve community engagement.
Do we ensure that disaster preparedness info is provided in Spanish?	Program S-6.2D calls for emergency preparedness outreach to be in multiple languages. Policy EDI-2.10 also recommends multi-lingual resiliency planning.

Comment	Response
In light of the Black Lives Matter mural incident in Terra Linda, is there consideration for providing alternative approaches for sanctioned expression in the City? It would be helpful to establish a different approach.	Recommend adding a new program to Policy EDI-1.3; creating sanctioned spaces of platforms for public expression on issues of social equity and racial justice.
Is it possible to add a program to raise awareness about racism in the community and do anti-racism education?	Add new program under EDI-1.2 to encourage and support an ongoing dialogue around race, equity, and social justice issues.
This section of the Plan is very helpful as an expression of the things we value and aspire to as a community.	Comment noted.
How will the City balance its economic and arts goals with the potential for displacement? We need to make sure we are not pricing residents out of the city.	This is the major focus of the Housing Element, to be updated in 2021-22. The Downtown Precise Plan includes an Anti-Displacement Strategy.
It may be unrealistic to support revitalization of the Canal without some displacement.	One way to mitigate displacement is to convert existing market-rate units to affordable, income-restricted units. This will be addressed in the Housing Element. Additional information will be provided to the Planning Commission on this topic related to the Canal's designation as an Opportunity Zone.
There are some terminology issues in this Chapter that need to be nuanced. Be careful about lumping everyone together in groups (e.g., Latino)—when possible identify individual communities such as Guatemalans, Salvadorans, etc. to enhance inclusion.	We will provide additional socio-economic data on page 14-4 that acknowledge the demographic diversity of the Canal, and the City in general
When we address "inclusion", we should also acknowledge citizenship status.	Comment noted. This will be added as appropriate.
Inclusion discussion should also address the LGBTQI community	We will expand the language to address the LGBTQI community.

STAFF REPORT ATTACHMENT 3
PLAN IMPLEMENTATION MATRIX

ID #	Program Description	Timeframe	Responsible Departments or Agencies (lead in bold)	Resources	Guiding Principles					
					Strengthening our Foundation	Adapting to the Future	Economic Vitality	Opportunity for All/Equity	Housing our Growing Community	Mobility
LAND USE ELEMENT										
LU-1.1A	Evaluate General Plan at least once every 5 years	OG	CD , PC, CC	GP Impl Fee	√	√	√	√	√	√
LU-1.2A	Use Development Review to ensure adequacy of infrastructure.	OG	CD , DPW, other agencies	Staff Time, Fees	√					√
LU-1.3A	Quantify and Monitor the Benefits of Transit-Oriented Development	MT	CD , CM, DPW (transp), other	Staff Time, Grants, Partnerships		√			√	√
LU-1.3B	Ensure that zoning allows reasonable interim uses of property	OG	CD , ED	Staff Time		√	√	√		
LU-1.6A	Encourage LAFCO to adopt urban service and annexation policies consistent with the General Plan	OG	CD , CC, CM, other (County)	Staff Time	√		√		√	
LU-1.7A	Review applications for development adjacent to San Rafael	OG	CD , CC, CM, other (County)	Staff Time	√	√	√		√	√
LU-1.8A	Implement zoning consistent with General Plan densities	ST	CD	Staff Time	√		√		√	
LU-1.8B	Maintain minimum densities	OG	CD	Staff Time				√	√	
LU-1.8C	Amend 14.16.300 to allow more than one unit per lot on lots under 5,000 SF in multi-family areas	ST	CD , PC, CC	Staff Time				√	√	
LU-1.10A	Implement General Plan FAR limits in zoning	ST	CD , PC, CC	Staff Time	√		√		√	
LU-1.12A	Explore TDR to address sea level rise and fire hazards	MT	CD , DPW, ED, other	Staff Time, Grants		√	√		√	
LU-1.15A	Maintain Planned Development (PD) zoning	OG	CD	Staff Time	√	√			√	
LU-1.16A	Implement school site reuse through zoning and development review	OG	CD , PC, CC, other	Staff Time, private funds	√			√	√	
LU-2.1B	Revise subdivision ordinance for consistency with General Plan	ST	CD , DPW	GP Impl Fee	√	√				

TIMEFRAME: ST= Short-Term (0-4 years); MT=Mid-Term (4-10 years); LT=Long-Term (10+years); OG=Ongoing
 RESPONSIBLE PARTIES: CD=Community Development; CM=City Manager; DPW=Public Works; DPW(T)=Public Works/Transportation; CC=City Council; PC=Planning Commission; ED=Economic Development; SUS=Sustainability; DIG=Digital Services; LR=Library and Recreation; POL=Police; Fire=Fire; FIN=Finance; CL=City Clerk; CA=City Attorney

PLAN IMPLEMENTATION MATRIX

ID #	Program Description	Timeframe	Responsible Departments or Agencies (lead in bold)	Resources	Guiding Principles					
					Strengthening our Foundation	Adapting to the Future	Economic Vitality	Opportunity for All/Equity	Housing our Growing Community	Mobility
LU-2.2A	Use development review to ensure compaibility of housing in commercial areas	OG	CD	Staff Time	√		√	√	√	
LU-2.2B	Evaluate creation of an innovation district on underutilized LI-O properties	ST	CD , ED, CM	Staff Time, Partnerships, Grants, private funds		√	√		√	
LU-2.3A	Use development review to evaluate proposed changes to neighborhood centers	OG	CD	Staff Time, Fees	√		√			
LU-2.3B	Develop zoning and economic development incentives to keep neighborhood centers viable	ST	CD , ED, other	Staff Time	√	√	√		√	
LU-2.4A	Periodically evaluate industrial zoning standards to ensure they respond to industry trends	OG	ED , CD, other	Staff Time	√	√	√	√		
LU-2.5A	Provide opportunities for small retail/ service businesses in industrial areas	OG	CD, ED	Staff Time			√	√		√
LU-2.6A	Encourage small lot consolidation through zoning	OG	CD	Staff Time		√	√	√	√	
LU-2.7A	Reduce the potential for off-site impacts of child care facilities	OG	CD	Staff Time	√					
LU-2.7B	Consider fee waivers for child care	OG	CD , CM, CC	Staff Time			√	√		
LU-2.9A	Encourage conversion of non-viable motels to affordable housing	OG	CD , ED	Staff Time			√	√	√	
LU-2.10A	Monitor effectiveness of short-term rental regulations and modify as needed	OG	CD , CA	Staff Time, Fees	√				√	
LU-2.12A	Update live-work regulations	ST	CD , Fire, CA	Staff Time		√	√		√	
LU-2.12B	Explore regulatory changes to encourage alternative housing types	ST	CD , Fire, CA	Staff Time		√		√	√	
LU-2.12C	Consider changes to the Muni Code to support more floating homes	MT	CD , CA, other	Staff Time		√			√	
LU-2.12D	Support ADUs and JADUs	OG	CD , CM	Staff Time	√			√	√	

TIMEFRAME: ST= Short-Term (0-4 years); MT=Mid-Term (4-10 years); LT=Long-Term (10+years); OG=Ongoing
 RESPONSIBLE PARTIES: CD=Community Development; CM=City Manager; DPW=Public Works; DPW(T)=Public Works/Transportation; CC=City Council;
 PC=Planning Commission; ED=Economic Development; SUS=Sustainability; DIG=Digital Services; LR=Library and Recreation; POL=Police; Fire=Fire;
 FIN=Finance; CL=City Clerk; CA=City Attorney

PLAN IMPLEMENTATION MATRIX

ID #	Program Description	Timeframe	Responsible Departments or Agencies (lead in bold)	Resources	Guiding Principles					
					Strengthening our Foundation	Adapting to the Future	Economic Vitality	Opportunity for All/Equity	Housing our Growing Community	Mobility
LU-2.13A	Evaluate odor impacts as part of development review	OG	CD , Fire	Staff Time, Development Fees	√			√		
LU-3.1A	Prepare area plans for North San Rafael, Canal, and other areas	ST	CD , CM, CC	Grants	√	√	√	√	√	√
LU-3.2A	Periodically update the zoning ordinance	OG	CD , PC	Staff Time	√	√	√	√	√	
LU-3.4A	Maintain an effective Code Enforcement program	OG	CD , Pol	Staff Time, Fees	√			√	√	
LU-3.4B	Use the development review process to establish conditions of approval; enforce these conditions	OG	CD , CA	Staff Time	√	√	√	√	√	√
LU-3.4C	Continue programs to abate illegal dumping and remove graffiti	OG	CD , Pol, CM, CA	Staff Time	√					
LU-3.6A	Maintain design guidelines for parking lots that improve their appearance and compatibility	OG	CD , DPW (T)	Staff Time	√	√	√			√
LU-3.7A	Implement measures to alleviate parking shortages; shared parking, time limits, permit parking; add'l off-street parking	OG	CD , DPW, Pol, P, CM	Staff Time	√					√
LU-3.7B	Amend parking regs to respond to new technologies and trends	OG	CD , DPW, Pol, P, ED	Staff Time		√	√			√
LU-3.8A	Continue abandoned vehicle abatement program	OG	P , CD, DPW, Pol	Staff Time, Fines	√					
LU-3.8B	Continue prohibiting use of overnight use of vehicles as residences in public rights of way	OG	P , CD, DPW, Pol	Staff Time	√				√	
LU-3.9A	Prioritize neighborhood serving uses on small commercial sites in residential areas to lower VMT	OG	CD , ED	Staff Time, Incentives	√	√				√
LU-3.9B	Integrate neighborhood serving uses in mixed use development on neighborhood commercial sites	OG	CD , ED	Staff Time, Incentives	√		√	√		
LU-3.10A	Support partnerships between neighborhoods and local institutions to address land use conflicts	OG	CM , CD	Staff Time	√	√	√	√		√
LU-3.11A	Support development of neighborhood websites	OG	DI , CD	Staff Time	√			√		

TIMEFRAME: ST= Short-Term (0-4 years); MT=Mid-Term (4-10 years); LT=Long-Term (10+years); OG=Ongoing
 RESPONSIBLE PARTIES: CD=Community Development; CM=City Manager; DPW=Public Works; DPW(T)=Public Works/Transportation; CC=City Council;
 PC=Planning Commission; ED=Economic Development; SUS=Sustainability; DIG=Digital Services; LR=Library and Recreation; POL=Police; Fire=Fire;
 FIN=Finance; CL=City Clerk; CA=City Attorney

Attachment 4: Potential Planning Metrics and Indicators (for discussion)

The following are examples of metrics and indicators that could be considered to track progress on General Plan Implementation (some of these could be referenced in the Appendix of the General Plan, following the implementation matrix for each element). We are not planning to add all of these metrics to the Appendix. This is intended as a “brainstorming” list for discussion. Other cities that have incorporated metrics in their long-range plans typically select a handful of indicators that span multiple topics. An example from the City of Denver’s Comprehensive Plan 2040 is included at the end of this Attachment.

LAND USE

- Number/ acres of annexations
- Acres (or percent of total development) that occurs through repurposing previously developed land (rather than using undeveloped land)
- % of city’s development that occurs in designated Transit Priority Areas (TPAs) and Priority Development Areas (PDAs) (based on acreage and on dwelling units or square feet)
- # housing units added (tracked through Housing Element Annual Report)
- # housing units by income group served (tracked through Housing Element Annual Report)
- % of new residential development that is single family vs multi-family
- % of new residential development designed for seniors / persons with special needs
- Number of Accessory Dwelling Units (ADUs) and Junior ADUs produced
- Number of area plans completed
- Square feet of office space, industrial space, retail space, other space added
- Square feet of mixed use development (including housing and employment in the same project) added
- Vacancy rates (residential, commercial, and industrial)
- Number / extent of lot consolidations and mergers (or acres impacted)
- Ratio of local jobs to number of local employed residents
- Number of transfer of development rights (TDR) projects
- Number of developments with LEED certification
- % of total household expenses on housing and transportation (HTI index)

MOBILITY

- Year over year traffic volume data
- Linear feet (or miles) of bike trails (Class I, II, III, IV) added
- Linear feet (or miles) of sidewalks added
- Miles of complete streets
- VMT per capita – 15% below regional average
- Road segments operating at LOS- D or better except where specified
- Percent of work trips made by single occupant vehicles, carpools, transit, bicycles, walking
- Journey to work data (Average commute time)
- Percent of residents working from home
- Mode share (% of trips made by car, bus, train, etc.)

- Bus Transit ridership
- SMART ridership
- Number of bike racks and bike storage facilities
- Number of shared bikes
- Number of EV charging stations
- Number of households within ¼ mile of a bus with 15 minute peak hour headway
- Expansion/ contraction of bus service
- WalkScore and BikeScore
- Number of car-sharing vehicles
- Number of hybrid, electric or low carbon fuel vehicles (and % of total)
- Pavement condition index
- Miles resurfaced
- Collision rates (bike, ped, vehicle)
- Streetlighting improvements

COMMUNITY DESIGN AND PRESERVATION

- Gateway areas enhanced
- Street trees planted
- Number of properties covered by historic resource inventory survey
- Number of buildings with historic landmark status
- Linear feet/ miles of streetscape improvements

CONSERVATION AND CLIMATE

- Acres protected as open space
- Acres acquired for resource management/ habitat conservation
- Wetland acreage restored or enhanced
- Linear feet of creek restoration
- New public access to creeks
- Air quality indicators (spare the air days, days in exceedance of state and federal standards, number of complaints)
- Investment in green infrastructure projects
- Water quality indicators (violations, water bodies on impaired list, etc.)
- Trash capture devices installed
- Locally generated greenhouse gas emissions (metric tons of CO2 equivalent)
- Energy use per capita
- % of energy generated by renewable sources
- % Zero emission vehicles
- Sea level rise data/ investment in levees and hardening
- Local solar installations
- Microgrid systems added
- Electricity and gas use
- Number of green roofs or low impact development projects

PARKS AND OPEN SPACE

- Acreage added to park inventory
- Park acreage per 1,000 residents
- Residents within a 10-minute walk of a park
- Park maintenance scores and quality ratings
- Number of recreational facilities by type (ballfields, playgrounds, tennis, pools, etc.)
- Park acres made available through joint use agreements with schools

SAFETY

- Number of structures seismically upgraded
- Number of soft-story or URM buildings
- Number of structures impacted by geologic hazard events
- Wildland fires (acres and incidents)
- Wildland Urban Interface acreage (and number of homes)
- Acres of vegetation management programs
- Implementation of Wildfire Prevention and Protection Plan measures
- Structures flood-proofed or retrofitted
- Infrastructure flood-proofed or retrofitted
- Number of emergency preparedness activities (number of participants in CERT, etc.)

NOISE

- Ambient noise levels (through noise measurements and contour mapping)
- Conformance to noise compatibility standards
- Number of housing units in areas where noise levels exceed 65 dB
- Noise complaints / ordinance violations

COMMUNITY SERVICES AND INFRASTRUCTURE

- School Enrollment
- School Facility Metrics (student teacher ratios, students per classroom, enrollment vs capacity etc.)
- School multipliers (students per dwelling unit)
- Educational performance (numerous metrics)
- Library Facility metrics (square feet per resident, materials per resident, materials checked out, etc.)
- Crime rates
- Fire and EMS incident data
- Number of residents participating in CERT or emergency response programs
- Emergency Response Time (police, fire)
- Total peak water demand/ Water consumption per capita
- Water capacity
- Wastewater treatment flows
- Wastewater treatment capacity

- Feet of new reclaimed water service
- Gallons of reclaimed water delivered
- % of solid waste diverted from landfills
- Solid waste generation per capita

ARTS AND CULTURE

- Number of special events (attendance, etc)
- Persons employed in arts industries
- Number of arts-related businesses
- Revenue generated by the arts and culture sector

ECONOMIC VITALITY

- Total number of jobs
- Employment by sector (and growth in targeted sectors, once they are identified)
- Job growth in emerging/ innovative industries
- Unemployment rate
- % of residents working within Marin County (increases)
- % of local workers living within Marin County (increases)
- Per capita income
- Median wage
- Enrollment in STEM programs
- Education level (% of residents with HS or college degree, or GED)
- Businesses created annually
- Jobs created in areas with high-quality transit access
- Dollars of private investment
- Retail sales/ Business to business sales

EQUITY, DIVERSITY, AND INCLUSION METRICS

- Health indicators by race and geography (cancer, heart disease, obesity, diabetes, COVID-19, etc.)
- Income by race and geography/ Poverty rate by race and geography
- Life expectancy
- Access to child care
- Housing conditions and overcrowding
- Percent of income spent on housing
- Educational attainment by race and geography
- Internet access
- Access to parks and city services
- Access to groceries and healthy food
- Public safety and crime data
- Percentage of capital improvement dollars in disadvantaged communities
- Other metrics as documented in the [Bay Area Equity Atlas](#)

APPENDIX 1: MEASURING OUR SUCCESS

Measuring our progress relies on thoughtful and deliberate tracking of key indicators. The Introduction identifies six metrics that the city is committed to measure annually. These metrics provide a snapshot of Denver each year and are a way to measure if we are headed in the right direction to realize our vision for 2040. None of the metrics work on their own and none is intended to capture everything that is relevant for a particular vision element. Instead, taken collectively, the metrics provide a helpful framework for evaluating progress over time.

This appendix provides more background on the sources and methodology behind the six metrics.

EQUITABLE, AFFORDABLE AND INCLUSIVE

Reduce the amount of cost-burdened households.

Metric

Percent of Denver households who spend more than 45% of their income on housing and transportation costs.

Sources

The H+T Index uses data from a combination of federal sources and transit data compiled by the Center for Neighborhood Technology (CNT). Data Sources include: 2011-2015 American Community Survey 5-year Estimate, US Census TIGER/Line Files, US Census Longitudinal Employment-Household Dynamics, Origin-Destination Employment Statistics, Consumer Expenditure Survey, 2015 National Transit Database, AllTransit™ and Odometer readings from The Illinois Department of Natural Resources

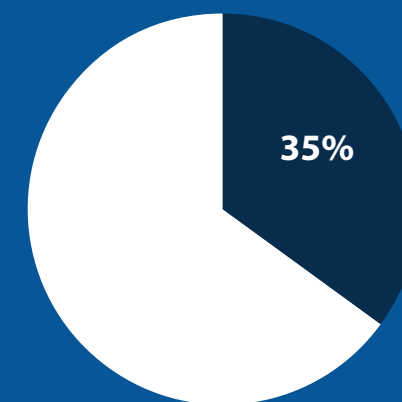
Why measure H+T costs?

The traditional measure of affordability recommends that household spend no more than 30% of household income on housing costs. Under this view, a little over half (55%) of US neighborhoods are considered “affordable” for the typical household. However, that benchmark fails to take into account transportation costs, which are typically a household’s second-largest expenditure. The H+T Index offers an expanded view of affordability, one that combines housing and transportation costs and sets the benchmark at no more than 45% of household income.

Methodology

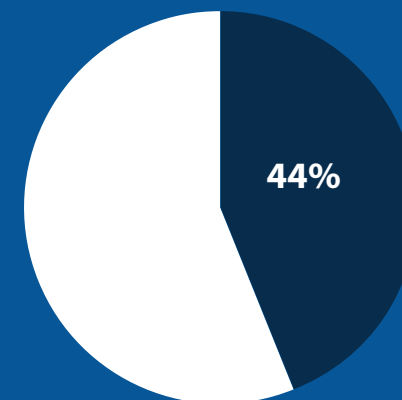
The Center for Neighborhood Technology’s Housing + Transportation (H+T®) Affordability Index (H+T Index) is an innovative tool that measures the true affordability of housing by calculating the transportation costs associated with a home’s location. The H+T Index was constructed to estimate three dependent variables (auto ownership, auto use, and transit use) as functions of 14 independent variables (median household income, average household size, average commuters per household, gross household density, regional household intensity, fraction of rental housing units, fraction of single family detached housing, employment access index, employment mix index, block density, transit connectivity index, total available transit trips per week, transit access shed and jobs within the transit access shed). To hone in on the built environment’s influence on transportation costs, the independent household variables (income, household size and commuters per household) are set at fixed values to control for any variation they might cause. By establishing and running the model for a “typical household” any variation observed in transportation costs is due to place and location, not household characteristics.

2040 Target



■ COST BURDENED HOUSEHOLDS
 ■ ALL OTHER HOUSEHOLDS

2017



For more:

You can find more information about the H+T Index and the Center for Neighborhood Technology (CNT) here:

<https://htaindex.cnt.org/>

2040 Target

78

60

COMPLETE NEIGHBORHOODS

ALL NEIGHBORHOODS

2016

78

18

STRONG AND AUTHENTIC NEIGHBORHOODS

Increase the number of neighborhoods with convenient access to transit, jobs and retail.

Metric

Number of Denver neighborhoods where at least 50% of households have access to quality transit and jobs and retail within walking or rolling distance.

Sources

The data for this metric comes from the City of Denver Assessors Office, City of Denver Department of Community Planning and Development, City of Denver Technology Services, and RTD.

Why measure?

Every Denver resident should have convenient access to the goods, services, and amenities needed in daily life, in addition to access to reliable and convenient transit. These amenities and services should be within a comfortable walking or rolling distance and meet the needs of all ages and abilities of Denver residents. Given the historical built form and land use patterns of some of Denver's neighborhoods, this may be unattainable for all residents, though a majority of residents living in a majority of Denver's neighborhoods should enjoy this level of access in order for Denver to be considered a city of complete neighborhoods.

Methodology

This metric is comprised of two components: 1. access to jobs and retail and 2. access to transit.

For the retail and jobs component a dataset CPD created a dataset using the existing land use data of all parcels classified as retail or mixed use that fall within a future center or corridor as defined by *Blueprint Denver*. The land use data is updated every other year. Households within a 1/4 mile of local centers and corridors and households within a 1/2 mile of regional and community centers and corridors were selected. Rather than the perfect half circle, a modified diamond shape with a either a length of 2106 ft (1/2 mile) or 1053 ft (1/4 mile) from its center point to its vertices. This is to compensate for the fact that even in the presence of a fully built out street grid, a half-mile walking or rolling distance will be less than the "as the crow flies" distance.

For access to high quality transit, households meeting the following criteria were selected:

- 1/2-mile from high-capacity transit—currently, all rail stations in Denver—measured as a 1/2 mile radius buffer; or
- 1/4 mile—measured as a 1/4 mile buffer—from the frequent transit network, which is defined by *Denver Moves: Transit* as 15 min or less headways; 6am-10pm; 7 days per week. The bus lines that currently meet this standard are 15 (E Colfax), 16 (W Colfax) and 0 (S Broadway).

The final metric captures those households that meet both criteria: 1. access to jobs and retail and 2. access to transit.

CONNECTED, SAFE AND ACCESSIBLE PLACES

Reduce dependence on driving alone.

Metric

Percent of Denver residents who drive alone to work in a single-occupancy vehicle.

Sources

American Community (ACS) Survey 5-year estimates, US Census Bureau

Why measure mode share?

The percentage of people who drive rather than using other travel modes (often called "mode share") reflects reliance on the automobile. As Denver has a more robust multimodal transportation system that includes safe, frequent and reliable choices for transit and other modes, fewer people will drive alone to work.

Methodology

The data for this metric comes directly from the American Community Survey (ACS), administered by the US Census Bureau. It is part of the ACS 5-year estimates. The 5-year estimates contain the largest sample sizes and most reliable data of all the ACS datasets. The dataset used for the current state was released by ACS in 2016 and captures the time frame of 2012-2016.

The ACS data is exclusively for commute trips, thus this metric only measures which transportation mode people use to travel to work.

2040 Target

50%

50%

DRIVE ALONE TO WORK
ALL OTHER MODES

2016

27%

73%

For more:

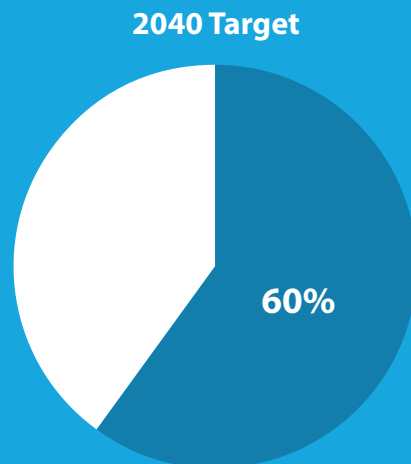
You can find more information about the American Community Survey, including the survey questionnaire with the question about how people travel to work, here:

<https://www.census.gov/programs-surveys/acs/>

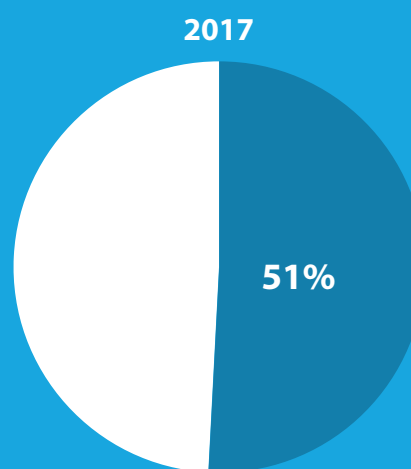
For more:

The *Denver Moves: Transit* plan has more information about the future frequent transit network for Denver and can be found here:

[Denver Moves: Transit Plan](#)



■ JOBS IN DIVERSE, INNOVATIVE ECONOMIC SECTORS
■ ALL OTHER JOBS



For more:

The North American Industry Classification System (NAICS) is the standard used by federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. For more info:

<https://www.census.gov/eos/www/naics/>

ECONOMICALLY DIVERSE AND VIBRANT

Increase the share of jobs supporting a diverse and innovative economy

Metric

Percent of local jobs in diverse, innovative economic sectors.

Sources

Colorado Department of Labor and Employment

Why measure?

As the global and national economy continue to transform, cities are defining themselves based on how much they embrace and invest in a range of diverse jobs, particularly those in growing parts of the economy. These businesses and jobs bring income and wealth to the businesses, families, and neighborhoods of Denver.

The business clusters measured by this metric are composed of part of several industrial sectors, including but not limited to: Manufacturing Information/Communication, Finance, Professional/Business Services, and Education. Some specific business groups are Advanced Manufacturing, Technology, Finance, Art and Design, and AgriBiz/AgriTech.

The business clusters measured are likely to grow faster, creating jobs and investments in our community, leading to innovation and sustainability, and providing tax revenues leading to fiscal sustainability. The businesses are expected to create jobs across the income and education spectrum, including middle-income and middle-skill jobs, but often have specific requirements for locational proximity and amenities, education/training requirements for employees and transportation mobility.

Methodology

Utilizing data from Colorado Department of Labor and Employment, Denver’s Office of Economic Development (OED) categorizes business groups by lower level North American Industry Classification (NAICS) assignments. OED combines specific business groups representing foundational components of the economy that are likely to create new jobs and lead to innovation, including: Advanced Manufacturing, Technology, Finance, Art and Design, and AgriBiz/AgriTech. OED then measures the total employment (by establishment location) within the combined business cluster. The percentage is a strong quantifiable metric which allows for a reliable and valid estimate of the share of the Denver’s economy focused on diverse jobs in fast growing components of the economy.

ENVIRONMENTALLY RESILIENT

Reduce Denver’s impact on climate change

Metric

Percent below Denver’s 2005 carbon emissions (Metric Tons of Carbon Dioxide equivalents).

Sources

City of Denver Department of Public Health & Environment

Why measure?

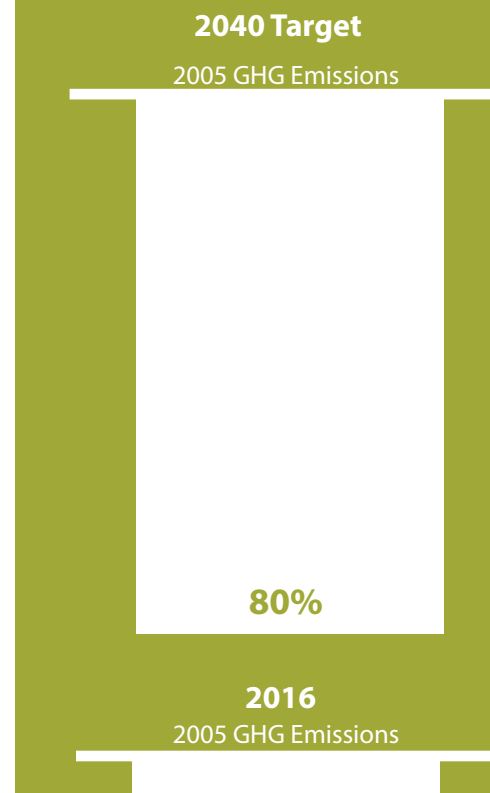
Greenhouse gas emissions from man-made sources (combustion of fossil fuels, land use changes, industrial processes) contribute to global climate change and the rise in global temperatures. Effects of climate change include extreme weather events, hotter temperatures, more rapid snowmelt in the mountains, and other impacts. Measurement of greenhouse gas emissions enables cities to identify and track specific strategies for reducing emissions. It is also a measure of a city’s contribution to global climate change.

Methodology

Denver’s annual GHG inventory, started in 2005, evaluates GHG emissions levels and progress made in emissions reduction efforts. The inventory measures the three most frequently occurring GHGs: Carbon dioxide (CO2), methane (CH4), and nitrogen oxides (NOx). The inventory categorizes emissions according to scope and sector. Inventory Scope is a determination of “where” the emissions occur relative to the City boundary, while inventory sector describes the type of emission, e.g. transportation, heating, etc.

Sources can be broken down into two distinct categories: core emissions and upstream emissions. Core or direct emissions are those that typically occur within the boundary of the city (Scope I) or are more directly controlled/influenced (Scope II), representing the greatest opportunity for action on the part of the city. These include emissions from building energy use, transportation and fuels, street lights, and waste management. Upstream or indirect emissions occur outside the boundary of the city but are demanded by people and businesses, such as refining of fuel, airline jet fuel, cement production, and food packaging and transport. GHG emissions are reported as total and per capita emissions in units of metric tons of CO2 equivalent (MtCO2e).

Denver is proud of its track record in conducting and reporting annual inventories, as well as public reporting of plans, targets and goals for climate mitigation and adaptation. A robust climate program allows for long-term trajectory analysis and forecasts. Denver will continue to produce and publicly release its annual GHG inventory to report on progress.



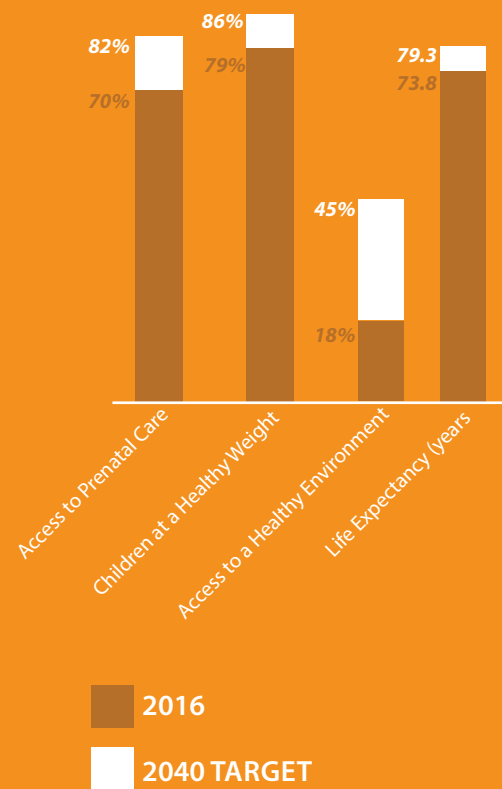
For more:

More about Denver’s commitment to reducing green house gas emissions can be found ion the 80x50 Climate Action Plan:

[80x50 Climate Action Plan](#)

HEALTHY AND ACTIVE

Reduce health inequities between Denver neighborhoods



Metric

Statistics for the lowest performing neighborhoods compared to highest performing neighborhoods in 2016 for each component of the Neighborhood Equity Index.

Sources

City and County of Denver GIS Data, Vital Statistics, Colorado BMI Surveillance System

Why measure neighborhood equity?

Inequities are created when barriers prevent individuals and communities from accessing the services and opportunities needed to attain their highest level of health. Everyone deserves a fair chance to lead a healthy life, but some are denied this chance because of social, economic, and environmental conditions.

Methodology

The data for this metric comes directly from the Neighborhood Equity Index prepared by the City of Denver Department of Public Health and Environment. The Neighborhood Equity Index is made up of five separate indicators: socioeconomic, built environment, access to care, morbidity, and mortality. For this metric, the socioeconomic indicator was not included because everyone should have access to healthy environment, be free from disease, and live a long life regardless of their income/education. Information about all of the other indicators is below:

Access to Prenatal Care- % of pregnancies without 1st trimester prenatal care using 2007-2013 Vital Statistics data.

Children at a Healthy Weight- % of children and youth under the age of 21 that are overweight or obese from Colorado BMI Surveillance System 2009-2013.

Access to a Healthy Environment- % of residents living within ¼ mile walk or roll to a full service grocery store and % of living units within ¼ mile walk or roll to a park from City and County GIS data 2015. Note: although improving access to grocery stores would require different strategies than improving access to parks, these two indicators are grouped together as a proxy for access to a healthy environment.

Life Expectancy- a measure calculated by Virginia Commonwealth University, Center on Society and Health using census population counts (2000 and 2010) and Vital Statistics Program death count data (2004-2013).

The data for each indicator was aggregated by neighborhood and grouped into quartiles in order to set the 2040 target. Each year the data will be re-aggregated, again grouped into quartiles, to track how the lowest performing quartile is performing compared to the 2040 target.

For more:

To find more information about the Denver Neighborhood Equity Index see below:

[Denver Neighborhood Equity Index](#)