

# ATTACHMENT 1:

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

*Note: Comments have been paraphrased for presentation purposes*

| Comment  | Response  |
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| <b>COMMENTS FROM THE OCTOBER 27 PLANNING COMMISSION HEARING</b>  |   |
| <b><i>YouTube Live Comments</i></b>  |   |
| 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 | <ul style="list-style-type: none"> <li>(1) Historic displacement of Miwok people from their land is acknowledged on page 14-1.</li> <li>(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.</li> <li>(3) Reference to revenue generator has been deleted.</li> </ul> |
| 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   |
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| <b>Zoom Phone-In Comments (Oct 27)</b>   |  |
| 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. | MCL comments on Land Use Element will be incorporated in subsequent revision to this section.  |
| 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.                         | 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. |
| 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.  | The referenced Clause NH-4.2(j) is being deleted.  |
| Barbara Salzman: Audio problems  | See comments in response to Audubon's letter below.  |
| <b>COMMENTS FROM THE NOVEMBER 12 PLANNING COMMISSION HEARING</b>   |  |
| <b>YouTube Live Comments</b>   |  |
| 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.  | See response to RGM letter below   |
| 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  | (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.                             |
| David Smith- Please consider the RGM comments  | Comments are being considered. See responses below.  |
| 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.   | 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.  |
| Phil Halstein/ RGM: Consider more actionable language where possible—including replacing “may” with “shall”.   | 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.   |

| Comment   | Response   |
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| <b>Zoom Phone-In Comments (Nov 12)</b>  |  |
| <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  |
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| <b>Letter from Shirley Fischer – October 21, 2020</b>   |   |
| <p><b>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.</b> 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>b. Add a policy and program items for managing the Wildlife-Human Interface.</b> 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><b>c1. The description of Vegetative Cover in Table 6-1 should not lump “Urban/Barren” together, as urban areas contain abundant wildlife.</b></p>   | <p>“Urban/Barren” will be changed to “Urban/ Other”</p>   |
| <p><b>c2. The description of urban habitat areas should acknowledge the diversity of wildlife in these areas.</b></p>   | <p>P. 6-3, second 2<sup>nd</sup> 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><b>Description of wetlands on P 6-6 should acknowledge the importance of adjacent uplands as refuge for wetland species.</b> 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>  |
| <b>Letter from Marin Audubon – October 21, 2020</b>   |   |
| <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  |
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| 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.   |

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| 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.  |
| <b>Letter from Responsible Growth Marin – October 22, 2020</b>  |  |
| <p><b>Land Use Element P 3-3. The Transit-Oriented Development (TOD).</b> 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.</p>   | <p>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.</p>   |
| <p><b>Land Use Element P 3-4. Growth Management/ Community Benefits.</b> 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.</p> | <p>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.</p> |
| <p><b>Policy LU-1.3 and Program LU-1.3A on Climate Change and Transit-Oriented Development.</b> 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.</p>   | <p>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.</p>   |
| <p><b>Policy LU-3.2: New Development in Residential Neighborhoods.</b> 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.</p>  | <p>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.</p>   |

| Comment   | Response   |
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| <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><b>Policy LU-3.7: On-Street Parking.</b> 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><b>Neighborhoods Element Policy NH-4.2 North San Rafael Town Center.</b> 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><b>Conservation Element Policy C-2.3 Improving Air Quality Through Land Use and Transportation Choices.</b> 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   |
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| <b>Letter from Sierra Club – October 26, 2020</b>   |  |
| <p>We concur and support the Sept 2, 2020 letter from Marin Conservation League</p>   | <p>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.</p> |
| <p>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.</p>   | <p>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.</p>  |
| <p>We especially draw your attention to MCL’s observation that many of the policies and programs are passively stated and use words like <i>“consider”, “recognize” and “explore” rather than action-oriented or mandatory verbs</i>. Setting lofty goals is important; setting a direction to attain them is also critical.</p>  | <p>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.</p>   |
| <p>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.</p> | <p>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.</p>  |
| <b>Letter from San Rafael Heritage – October 25, 2020</b>   |  |
| <p>San Rafael Heritage intends to submit more specific comments prior to the Dec 15 Planning Commission meeting.</p>  | <p>Comment noted.</p>  |
| <p>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.</p>   | <p>Comment noted; the text will be edited accordingly.</p>   |
| <p>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.</p>   | <p>Comment noted.</p>  |



| Comment  | Response   |
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| <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><b>Letter from Terra Linda Homeowners Association – October 24, 2020</b></p>  |  |
| <p><b>Land Use Element – page 3-3 to 3-5: Land Use Planning Concepts (p. 3-4).</b> 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   |
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| <p><b>P 3-3. Transit-Oriented Development Concept</b> 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 <b>Policy LU 1.3 -- Land Use and Climate Change</b>. 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><b>Policy LU 1.3 -- Land Use and Climate Change</b> “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><b>Policy LU 1.3A -- Land Use and Climate Change</b>. 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><b>Land Use Element – Land Use Element/Public and Open Space Categories (p. 3-14/pdf 58)</b></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><b>Land Use Element Goal LU-1:</b> 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><b>Mobility Element Goal M-1:</b> 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   |
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| <p><b>Mobility Element Goal M-3:</b> 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><b>Policy LU-1.9 Clustering</b> – 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><b>Policy LU-2.8 Senior and Disabled Care Facilities</b><br/>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><b>Policy LU-3.2 (New Development in Residential Neighborhoods)</b> should apply to redevelopment and remodeling projects as well as new development. recommend that this policy be re-titled <b>“New Development and Redevelopment in Residential Neighborhoods”</b><br/>b. Add: <i>“Minimize reduction of views, privacy and solar access for neighboring properties.”</i><br/>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><b>Policy LU-3.7 On-Street Parking.</b> Same comment on this Policy as RGM.</p>   | <p>See earlier response to RGM on this policy.</p>   |
| <p><b>Policy LU-3.9A Neighborhood-Serving Uses.</b> Please add <i>“hardware &amp; household maintenance, household goods, grocery stores, dry-cleaning, hair salons, postal &amp; telecommunications services,”</i> to the examples of Neighborhood Serving Uses.</p>  | <p>Will add these uses</p>   |
| <p><b>Neighborhoods Element Policy NH-4.2 on Northgate Mall</b>—delete reference to expanding the Mall in (e) and delete Clause (j).</p>   | <p>Changes made. See earlier response to RGM</p>   |
| <p><b>Policy NH 4.7A [Terra Linda] Community Improvements.</b> 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  |
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| <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><b>Policy NH 4.8A Beautification and Restoration Projects.</b> 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 <del>to</del> 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><b>P 4-58 Neighborhoods Element:</b> 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><b>Conservation and Climate Change Element.</b> 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><b>Add a Conservation Element policy and program items for managing the Wildlife-Human Interface.</b></p>  | See earlier response to Shirley Fischer comment on this subject.  |
| <p><b>Description of wetlands on P 6-6 should acknowledge the importance of adjacent uplands as refuge for wetland species.</b> Upland areas adjacent to wetland areas should remain undeveloped.</p>   | See earlier response to Shirley Fischer comment on this subject.  |
| <p><b>Policy C-2.3: Improving Air Quality Through Land Use and Transportation Choices.</b> 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><b>Community Design and Preservation Element.</b> 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><b>Parks, Rec and Open Space.</b> 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  |
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| <b>Letters Regarding Redwood Tree Preservation – Oct 26 and 27, 2020</b>   |   |
| <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> |
| <b>Letter From Hillside Neighbors (Victoria DeWitt) – Oct 26, 2020</b>   |   |
| <p><b>Chapter 3. Land Use Element.</b> 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:<br/>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><b>Edit Policy NH-2.2: <del>Miracle Mile</del> West End Circulation</b><br/>Improve circulation, provisions for cross-traffic and “U-turn” movements, bicycle and pedestrian safety, and traffic controls along <del>Fourth Street</del> <u>Second Street and the Miracle Mile</u>, especially at intersections <del>with side streets</del>.</p>   | <p>Edits are acceptable and will be included.</p>   |
| <p><b>Replace NH-2.2A with a more complete list of local circulation priorities:</b><br/><b><u>Program NH-2.2A: Neighborhood Circulation Concepts.</u></b> <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  |
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| <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><b>Add the following programs</b></p> <p><b><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></b></p> <p><b><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></b></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><b><u>Edit Program CDP-4.2A (Improving Design Review Efficiency by adding two new bulleted items:</u></b><br/> <b><u>Continue to improve the design review process by:</u></b></p> <ul style="list-style-type: none"> <li>• <u>Engaging stakeholders and the developer early so that issues can be worked out before initial submittal</u></li> <li>• <u>Clarifying requirements for initial submittals to improve their quality</u></li> <li>• <u>Continue to require all necessary reports, including geotechnical, grading, and survey, prior to review of hillside development</u></li> <li>• <u>Adjusting notification procedures to encourage earlier and broader participation</u></li> <li>• <u>Changing the project review sequence so that Planning Commission feedback is solicited before the Design Review Board for specific projects.</u></li> <li>• <u>Continue to involve the community with their written comments and public participation in the design review process.</u></li> <li>• <u>Periodically evaluating and updating the guidelines, including thresholds for design review.</u></li> </ul> | <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  |
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| In Parks, Rec, and Open Space Element, add <b><u>Program PROS-3.8C: New Neighborhood Trails</u></b> . <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 <b><u>Program PROS-3.8D: Complete trails previously acquired</u></b> . <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)   |
| <b>Safety Element. Policy S-1.2: Location of Future Development</b> , add “slope stability” to list of considerations.   | Will add slope stability.   |
| <b>Safety Element, Program S-1.2B:</b> Add “adequately” to second sentence ( <u>adequately</u> mitigated)  | This edit will be included.   |
| <b>Safety Element Goal 2:</b> Add mudslides to the list  | Will add mudslides.   |
| P 8-5: Modify 1st paragraph under Goal:<br>The potential for hazards <del>can</del> <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 <a href="#">here</a> . It is unchanged from General Plan 2020.  |
| <b>Edit Program S-2.1B: Geotechnical Review as follows:</b><br>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, <del>and</del> 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.   |
| <b>Letter From Victoria DeWitt – Nov 12, 2020</b>  |   |
| 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   |
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| <b>Mobility Element Policy M-2.9:</b> 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.  |
| <b>Mobility Element Policy M-6.1:</b> 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.   |
| <b>Mobility Element Policy M-6.3:</b> Edit to read “Develop pedestrian and bicycle networks that connect residents and visitors to major activity and shopping centers, existing and planned transit, <del>and</del> schools, <u>and other neighborhoods</u> ”  | This edit will be included.  |
| <b>Mobility Element Program M-6.3A:</b> 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.   |
| <b>Mobility Element Policy M-7.4:</b> 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.  |
| <b>Mobility Element Program M-7.3A:</b> 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.  |
| <b>Community Services Policy CSI-3.2:</b> 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 <del>needs are considered and effectively addressed.</del> <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   |
| <b>Program CSI-3.2B: Emergency Response Time.</b> Use the development review process to identify appropriate measures to reduce fire hazards and ensure <del>adequate emergency, response capacity, fire and EMS response times meet the minimum criteria established by NFPA Standard 1710</del>   | 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> ” |
| <b>Edit Policy CSI-4.2 as follows:</b> 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 <del>and</del> <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.  |
| <b>Edit Policy CSI-4.7:</b> 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  |
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| <b>Program CSI-4.7A (Pavement Management)</b> 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.                            |
| <b>Policy CSI-5.6:</b> Add pedestrian pathways as an example of a community benefit.   | This edit will be made.   |
| <b>Economic Vitality Policy EV-3.8:</b> 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. |
| <b>Edit Economic Vitality Program EV-3.8C: Pre-Submittal Process as follows:</b> Improve the <del>efficiency and speed of the</del> development review process by <u>updating departmental procedures, revisiting</u> neighborhood notification and meeting procedures. <del>and updating the pre-submittal process to identify</del> <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.                        |
| <b>Equity Diversity Inclusion Goal EDI-1.</b> 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.   |
| <b>Letter From Responsible Growth in Marin – Nov 12, 2020 (all comments are on Mobility EI)</b>  |   |
| 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  |
| <b>P 10-1,</b> 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.  |
| <b>P 10-4,</b> 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)   |
| <b>P 10-5 and 6.</b> 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.  |
| <b>P 10-27,</b> 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  |
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| <b>Program M-2.3A:</b> 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.   |
| <b>Program M-3.2B and C</b> (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 |
| <b>Program M-3.2B:</b> 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 <a href="#">staff report</a> .   |
| <b>Program M-3.3D:</b> Note that peak hours have shifted, which should be considered when conducting traffic studies and implementing TDM measures.   | Comment noted.  |
| <b>Policy M-2.5D:</b> 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.  |
| <b>P 10-21, paragraph 3.</b> 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.  |
| <b>Program M-2.5C:</b> 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   |
| <b>Table 10-1:</b> 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.   |
| <b>Program M-2.8A</b> should include a due date/ timeframe  | This will be included in the Implementation Appendix.   |
| <b>Policy M-2.10</b> (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.   |
| <b>ME, p. 10-22:</b> “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   |
| <b>ME, p. 10-25:</b> “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.  |
| <b>ME, p. 10-27:</b> 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  |
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| <b>ME, p. 10-27:</b> 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.  |
| <b>ME, p. 10-29:</b> How is the efficiency of TDM measures monitored and what is the success rate so far?  | It varies from community to community. <a href="#">Here is a link</a> to USDOT data on this subject.  |
| <b>ME, p. 10-29:</b> “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.   |
| <b>Policy M-7.6</b> 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.   |
| <b>P 10-1,</b> 4 <sup>th</sup> 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. |
| <b>P. 10-6</b> —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.  |
| <b>Program M-2.5A:</b> 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.   |
| <b>ME, p. 10-23,</b> Table 10-1, 2E: “... while maintaining high quality transit route along 4 <sup>th</sup> Street...” Why not consider a pedestrian zone along 4 <sup>th</sup> Street?   | 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 <sup>th</sup> remains the primary transit spine of Downtown.   |
| <b>ME, p. 10-30,</b> 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.   |
| <b>ME, p. 10-34:</b> “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.  |
| <b>ME, p. 10-35:</b> “... 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   |
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| <p><b>ME, p. 10-39:</b> "... 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><b>ME, p. 10-9:</b> "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><b>ME, 10-9:</b> should also mention "Sonoma Airport."</p>   | <p>Charles M Schulz Sonoma County Airport will be mentioned (along with OAK and SFO)</p>                           |
| <p><b>ME, p. 10-13:</b> 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><b>ME, P 10-37</b>—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>   |