

Additional Comments on Downtown Precise Plan Received between Jan 26 and April 1, 2021, with Staff Responses

Action items are in bold and are underlined

COMMENT	RESPONSE
Part One: Letters Received	
Note: Key points in each letter have been summarized below. These are not verbatim excerpts from each letter.	
Letter from San Rafael Heritage – Feb 4, 2021	
1. General: SRH recognizes preservation as a vital part of a successful downtown and a way to instill authenticity and a sense of place. Retaining, restoring, and maintaining historic resources must be part of Downtown’s renaissance. Preservation must balance property rights with other community goals, maintain dialogue with property owners, provide meaningful incentives, and be flexible and respectful for all stakeholders.	All comments noted. The Downtown Precise Plan strongly supports and aligns with these points.
2. General: SRH proposes adjustments to the inventory, to be covered later	Comment noted—see later comments and responses
3. Pages 120-122. Funds provided to mitigate historic resource impacts (by development) should be retained in an account and used for Downtown preservation priorities, including updating the historic resources inventory, funding an HRAC, providing interpretive signage and funding other activities such as print/digital media on SR history, supporting landmark applications, developing rehab/restore information for City website, providing info to property owners about preservation incentives, and administering a Mills Act program	Some of these actions are already recommended in Chapter 5 of the Precise Plan (pages 120-122)—the remainder will be considered, either here or in General Plan 2040. The overall concept of using mitigation fees for these purposes will be included in General Plan 2040.
4. Page 122. Rather than basing ratings solely on Secretary of the Interior/ State Office of HP standards, also allow (a) Local landmark designation of community assets; (b) Relevancy of a resource to achieving DTPP urban design and place making objectives.	This is currently the case and will continue to be the case in the future, as the City will continue to have its own local register that is broader than the State and federal registers. However, State and federal standards will provide the underlying framework for ratings, per the Plan’s recommendations.
5. Pages 120-122. Consider five additional incentives not mentioned in the DTPP: (1) façade easements; (2) Local landmark designation to facilitate access to other incentives; (3) TDR contracts with tailored preservation and restoration provisions; (4) development bonuses for open space associated with historic resources and qualified restorations; (5) air rights development consistent with FBC criteria with transfer of bulk from stepbacks.	Will add façade easements to Chapter 5. #2, 3, and 4 are already in the Plan though may be fleshed out further to reflect these points. #5 would have limited applicability given the size and scale of development in the area but could be woven into #3 (TDR).

COMMENT	RESPONSE
<p>6. P 104: Edit Fig 5.2 photo caption: <i>The original 1884 depot that was replaced with a new depot in 1929. The 1929 depot replaced the original 1884 structure.</i></p>	<p>New Caption: The 1929 depot replaced the structure shown here, built in 1884.</p>
<p>7. P 105, Paragraph 1, Sentence 2. Edit: <i>Although altered The depot <u>building that stands today is in the its original station location and still orients orientation to the active rail lines running north and south through San Rafael.</u></i></p>	<p>This change will be made</p>
<p>8. Page 108: add these bullet points to “key issues”</p> <ul style="list-style-type: none"> • Historic buildings important to the local community may be protected as a local landmark, whether or not they qualify for the Secretary of the Interior and the State Office of Historic Preservation (OHP) guidelines. • Establish an application process for local landmark status, and include a fee schedule with a consideration to accommodate buildings with civic stature 	<p>The bulleted list shows issues. The suggested changes are not “issues” but are rather objectives.</p> <p>The following bullet will be added (P 109):</p> <ul style="list-style-type: none"> • The application process for local landmark status is outdated
<p>9. Page 110, paragraph 1. Insert full title and date for prior and current surveys <i>“The City of San Rafael conducted a survey in 1976-1977 and which was published in January 1978 and updated in 1986: <u>The San Rafael Historical/Architectural Survey Final Inventory List of Structures and Areas</u>, by Charles Hall Page and Associates and San Rafael City Staff.”</i></p>	<p>First sentence will be edited as follows:</p> <p><i>“In 1976-77, the City of San Rafael conducted a survey (published in 1978) of older, architecturally significant buildings...”</i></p> <p>If the full title is referenced, it will be in a footnote.</p>
<p>10. Page 111. Fig 5.6. The NWPRR Depot is not shown as a resource on all of the maps. Heritage requests that it be included as a resource and rated.</p>	<p>Comment noted. The building was identified as not eligible by the architectural consultants. See related discussion on this issue elsewhere.</p>
<p>11. Page 112, edit as follows: <i>Centered on the former-rail line to Petaluma, this area contains some of the oldest structures in San Rafael, significantly this area achieves its significance with the railroad depot building. This area developed developing almost simultaneously with the denser Downtown Core to the west.</i></p>	<p>Proposed Edit: <i><u>“Centered on the rail line to Petaluma, this area contains some of the oldest structures in San Rafael. The area developed almost simultaneously with...”</u></i></p>
<p>12. Page 116 Observations: West End Village is mischaracterized as predominantly mid-century. It has a wide range of building ages and architectural styles including many block form buildings with facades at the sidewalk property line. A number of buildings date from the last quarter of the 19th century and most others from the first four decades of the 20th century. Mid-century and later buildings are the least common building types.</p>	<p>Edit as follows: <i>“The West End Village is characterized by <u>a wide range of building ages and styles, including many buildings along Fourth Street with facades at the front property line. A number of buildings date from the late 1800s and early 1900s. The area also includes single family residences and mid-century 1950s-60s retail construction including original brick, tile, and stucco storefronts as well as single family residences along G Street. Centered on Fourth Street, this western gateway to Downtown is defined by <u>several auto-oriented retail storefronts and centers, some with dedicated off-street parking construction including many single story mid-century, modern storefronts designated parking.</u></u></i></p>

COMMENT	RESPONSE
<p>13. Page 117</p> <p>Observations: Two of the buildings at the northwest corner of 4th Street and E appear to not qualify as “eligible”.</p>	<p>Comment addressed in DEIR responses. The Map will be updated to only show the eligible building.</p>
<p>14. Page 120</p> <p>A. Consider instead establishing a Historic Resource Advisory Committee (HRAC), appointed by and reporting to the Planning Commission rather than a full commission; this would better manage costs and staff resources. Members should have a direct interest and or expertise in historic preservation and related areas such as architecture, construction and urban design and reflect the community’s diversity. The Redwood City HRAC provides a model for San Rafael particularly as it relates to implementation of a DTPP.</p> <p>B. Staff expertise or an on call historic preservation consultant combined with citizen participation provides more informed decision making, builds local capacity, augments staff resources with volunteer support, and provides elected and appointed officials and staff a better sense of what the community values</p>	<p>The option suggested by point (A) is included in the bulleted list in the second column (it’s the second bullet). SRH’s support for this option is noted. The possibility of having the HRAC be comprised of members with expertise in preservation, architecture, urban design, etc. is noted and not precluded by the Precise Plan’s recommendation.</p> <p>Staff concurs with Point (B) as stated.</p>
<p>15. Page 120</p> <p>Role of the HRAC, defined and identified in the DTPP, approved by City Council: a) Findings and recommendations on preservation issues; b) Voluntary assistance on historic preservation research, community engagement, youth education, walking tours and other events including; c) Formulating recommendations for landmark status and historic districts; d) Increasing community knowledge and innovation in historic preservation and related topics by attending in events and seminars in preservation technology, diversity in historic preservation, finance and incentives and other related topics.</p>	<p>All comments noted. The purview and role of the HRAC would be determined if and when this is selected as the preferred option. Other options are listed for consideration.</p>
<p>16. Page 121</p> <p>In many cases buildings identified as nonconforming could be made conforming with appropriate restoration of façades to their period of construction. Heritage believes it appropriate to offer incentives associated with landmark designation to encourage owners to restore building façades in the interest of achieving downtown urban design and place making objectives.</p>	<p>Add the following text on P 121, column 1 after the bulleted list of incentives.</p> <p><u>Preservation incentives should be structured to apply not only to highly-rated historic buildings, but to other older structures where sensitive restoration to their period of construction would achieve Downtown urban design and place making objectives.</u></p>

COMMENT	RESPONSE
<p>17. Pages 124-125, Tables 5A-5B Recommend: Further consideration is needed along with the form based code including refinements following input from the Business Improvement District (BID), Heritage and Chamber of Commerce. Heritage recommends taking a closer look at the Redwood City Downtown Precise Plan with a view toward clarifying and simplifying the building ratings, DTPP guidelines and processes. The intent should be to provide a clear approval path for projects that conform to the guidelines so that they are also in conformance with CEQA and require no further action for certification.</p>	<p>Comments noted. This comment will be addressed through revisions to the design standards in the Form Based Code. See DEIR responses for further guidance.</p>
<p>18. Page 124, Table 5A. Relocation requirements for contributing “house form resources” appear to be more restrictive than demolition. This is counter intuitive. Compare contributing “house form buildings” to related text for contributing “block form buildings”</p>	<p>Staff will look at changing the recommendation for relocating “contributing house form buildings” to match “contributing block form buildings”</p>
<p>19. Page 125, Table 5B Recommend: This table should apply only to development adjacent to resources within historic districts along specific street frontages such as 4th Street or B Street. Otherwise the criteria should only apply to projects resulting in an affirmative response to, “Does the proposed adjacent development result in the resource not being eligible for national register, state landmark or local landmark designation?” A negative response would result in the project not having any additional requirements related to historic preservation. Evolution of context, such as a newer and larger building being constructed adjacent to a smaller scale historic or contributing resource outside of a designated historic district, would not typically impact a resource’s eligibility for designation.</p>	<p>This comment is being addressed through the DEIR. The requested change will be incorporated in the Form Based Code and related tables will be updated as needed.</p>
<p>20. Page 112, 1st column, first sentence under Downtown Gateway Sub-Area and also Page 116, 2nd column, first sentence under Montecito Sub-Commercial Area. In the text, the division between the Gateway and Montecito Sub-Areas should be Irwin Street and not Hwy 101.</p>	<p>This correction will be made in both cases.</p>
<p>20. Global: On all plans, San Rafael High School is erroneously labeled Madrone High School. This should be corrected.</p>	<p>The maps will be clarified to ensure that labels for both schools are correctly positioned. The Madrone label will be moved up and to the left slightly, and the San Rafael High School label will be added.</p>

COMMENT	RESPONSE
Email from Jon Previtali – Jan 27, 2021	
1) Page 315. Section 3.3.060, p 315, Does the “stoop” provision allow for residential windows that are too close to the sidewalk for the comfort and privacy of the occupants?	Comment noted. Design team to follow-up.
2) Page 298. Table 3.2.026. Can the City require corner elements on buildings smaller than 150' in width along the sidewalk and also on corner buildings regardless of width? Corner elements add a lot to the character and aesthetic of Downtown. They could also act to prevent blind corners for pedestrians, motorists and bicycles, by creating a more than 90-degree transition for buildings that use the option for a zero setback from the sidewalk.	Comment noted. Design team to follow-up.
Letter from Victoria DeWitt – Feb 9, 2021	
1) Comments address zoning for the triangular shaped land area bordered by Ida Street to the East, Second Street to the South, and Fourth Street to the North. This area consists of 8 separate parcels with 7 separate owners. Most of these parcels have frontage on Fourth Street as well as Second Street. One of the parcels (APN 011-231-05) actually has 2 existing buildings, one facing Fourth and one facing Second. Proposed zoning under the draft plan is T4MS-O, 40/60. Abutting areas have 30- and 40-foot height limits and 10 bonus allowances. Why is this area being given a higher density zoning? The two large lots fronting Second Street (APN 011-231-16 and 17) should be zoned T4N 30/40 and the larger lot with Fourth Street frontage (APN 011-231-21) could be zoned T4MS 40/50. The remaining lots, APN 011-231-26, 03, 04, 05, and 06 should be zoned T4MS-O 40/50 to agree with the proposed zoning along Fourth Street in the West End Village. T4N 30/40 should be considered for parcels facing Ida and Second Streets to be more compatible with the neighboring residential zoning.	<p>The area in question has the same base zoning as the 4th Street corridor in the West End Village. Both areas have a maximum allowable base height of 40 feet, which assumes three story construction with ground floor non-residential uses. The difference is that a height bonus of 20 feet is offered on these properties, whereas the height bonus offered elsewhere in West End Village is only 10 feet. The bonus is intended as an incentive to consolidate the eight separate parcels, many of which contain auto-oriented retail uses and have low improvement values relative to the value of the land. The full bonus height would only be available to projects that provide affordable housing in excess of City requirements or community benefits such parks, parking, and childcare facilities. Several of the parcels in question have low structure coverage (i.e., Best Buy, Jack in the Box, IHOP), making them more viable as mixed use sites that would benefit from such incentives. This area was also identified as the western “gateway” to Downtown.</p> <p>We are re-assessing height bonuses as part of the public review process. Recent changes to State density bonus law (Jan 2021) and the City’s inclusionary housing requirements may require further adjustments.</p>
2) Does the new Form Based Zoning include the Street to the South of these previously mentioned parcels. In other words, will any development proposals for these parcels need to incorporate Second Street and the street medians and landscaping on Second Street or will the new zoning encourage turning our backs on Second Street and focus only on Fourth Street facades and landscaping?	The Form Based Code applies to parcels on the north side of Second Street and would require streetscape improvements, landscaping, amenities, and attractive facades on the Second Street “side” of any buildings with double frontage. The Code does not apply to buildings on the south side of Second Street on this block, since it’s outside the Plan area—but these properties are mostly single family residences and are not being rezoned.

COMMENT	RESPONSE
Letter from Liza Wozniak, Feb 19, 2021	
<p>Reassess 1929 NWP RR Depot building, as it should be eligible for inclusion on the National Register of Historic Places. Building is a landmark and could be re-envisioned for public use, serving arriving rail and bus passengers as a marketplace, providing information, refreshments and a gateway to downtown retail on 4th Street. The structure is instantly recognizable and radiates the greatness of the railroad era.</p>	<p>Comment will be treated as a DEIR comment and is being handled through the former Response to Comments process on that document.</p>
Staff Notes – Feb 20, 2021	
<p>Zoning Map/ Regulating Plan will be amended to show continued Public/Quasi-Public Zoning of civic buildings such as City Hall and the Public Safety Center, and Park/ Open Space zoning for Albert Park, Boyd Park, Court St Plaza, Mahon Creek, and other areas currently zoned P/OS within the boundary.</p>	<p>Changes will appear in Final Precise Plan</p>
<p>Figure 4-21 incorrectly shows the boundary line between Downtown Core and Downtown Gateway. The boundary is correctly shown on Figure 4-28.</p>	<p>This will be corrected in the Final Plan</p>
San Rafael Heritage EIR Comments related to Precise Plan Content – March 5, 2021	
<p>1. (Page 121) Provide a process to improve the rating of resources and a path to landmark designation for actions by landowners to restore and rehabilitate them. This provides parcel owners a choice of action. The objective is to allow access to incentives afforded by local landmark designation, and state or federal listing where possible. The urban design objective is to improve streetscapes through enhancement of what might not be considered landmark worthy or a contributing resource without restoration and other improvements. A good example of this is the MMWD Building at 874 4th St. The project scope could include removal of the storefront addition in front of the building, creation of a private plaza in its place, restoration of the building façade and transfer of height and bulk to the rear of the site. This would result in a currently “E” rated resource receiving an A or B rating benefiting from incentives associated with local landmark designation and the public benefit of an improved streetscape. Landowner incentives may include, but not limited to, federal tax credits, application of the historic building code, and reduction of local property taxes associated with a Mills Act Contracts and façade easements.</p>	<p>See Comment 16 in February 4 SRH letter. We will add a bulleted item on page 121 that encourages the approach described here. As appropriate, language will be added to the Precise Plan supporting the renovation of older buildings that are not highly rated, with the intent of enhancing the historic character of a district. This is particularly relevant within the eligible districts.</p>

COMMENT	RESPONSE
<p>2. Provide an example of an existing block form building on 4th Street before and after restoration of the façade to illustrate the action noted in #2 above. Commonly original storefront transoms and architectural features are concealed behind a more recent remodel. Those features and fenestration that have been removed or altered can be restored.</p>	<p>We will confer with SRH on an appropriate local example or find an example from another city where this has been done. This could replace the two photos at the bottom of page 119.</p>
<p>3. P 121 (roughly). Conduct an additional priority review of selected areas not surveyed during the 2019 field work to identify highly rated (A-C) resources (Refer to DEIR pg. 4.6.16 Figure 4.5-2). It appears the area south of 2nd Street has one potential resource: Albert Field. The Montecito Shopping Center Area has no potential landmark or contributing resources and the parcels on the north side of 4th between Mary, Mission and Union appear to have no resources. The Latham Street area may ultimately qualify as a historic district, will not be subject to DTPP related zoning changes and can be included in a future survey update. The properties along 5th Avenue starting at Cijos and extending to the western and northern boundaries of the DTPP, and those on either side of Irwin in the vicinity of 5th and Mission are recommended for priority review to identify resources to be considered in the DEIR. If sufficient resources or time aren't available, SRH recommends prioritizing these areas for the next update. SRH is available to assist in this process.</p>	<p>This can be listed as a priority action to be undertaken after the Downtown Precise Plan is adopted (for example on Page 121), but will not be done before adoption. The Montecito Shopping Center Area was surveyed but no resources were identified. Parcels along Irwin in the vicinity of 5th and Mission were likewise surveyed as part of the 2019 survey. However, only parcels within the DTPP boundary were included.</p>
<p>4. General: Modify the maps and inventory lists to conform to the revised inventory and ratings. For example, on Figure 4-1 (page 4-4) the resource shown on the northwest corner of 4th and E Streets should only include the former automobile dealership on the corner.</p>	<p>In the event any of the ratings are changed, all maps will be modified accordingly.</p>
<p>5. All graphics relating to the historic core should be modified. An example is Figure 1-1, page 1-5. Please refer to the letter from Leslie Simons for clarification.</p>	<p>Reference is unclear. If this refers to Figure 1-1, page 1-5 in the Appendix (the Historic Resources Inventory Summary Report), the map simply shows the boundary of the DTPP and has no reference to the "historic core."</p>
<p>6. (Page 122-125) Provide prescriptive requirements to maintain landmark status for resources subject to significant modification. In Redwood City's case, for what are termed as block form buildings in the San Rafael DTPP, this typically includes façade restoration and maintenance of 75% of the original exterior walls of the resource. This includes original walls retained below new construction and doesn't preclude air rights development conforming with the form-based code over block form resources (typically a specific setback dimension for the new construction from the resource's street façade).</p>	<p>Pending further review by the CEQA team (PlaceWorks/ Origer) and also by the Design team (Opticos/ Garavaglia). If deemed acceptable by the two teams, this approach will likely be incorporated in the Final Precise Plan. Conforming revisions to Chapter 5 and Chapter 9 (Form Based Code) will be made as appropriate.</p>

COMMENT	RESPONSE
<p>7. (P. 122-125) The form-based code standards in the San Rafael appear to be overly prescriptive on sites adjoining resources and districts and on sites themselves. The proposed DTPP form-based code (Code) criteria significantly impact future development adjacent to historic districts and eligible and contributing resources. The Code requires adjacent new construction to step back from property boundaries and have roof forms such as gabled elements in addition to street step backs otherwise required. It also places more restrictive limits on the number of stories that can be added to a resource. The intent is to affect a form and bulk transition between larger buildings and historic resources and/or districts. This has a significant impact on the development potential of adjacent parcels. Affected landowners are likely to strongly object to historic landmark or district designation on a property adjacent to their holdings considering these actions to have a detrimental impact on their property development potential. In addition, this will likely reduce the number of potential sites that can economically accommodate the kind of change anticipated by the DTPP and the City Council.</p> <p>Letter references Redwood City standards as an example of a more acceptable approach. The RWC approach relies on a balance by applying step backs along streets regardless of the presence of historic resources and has no step back or other form limitations on property boundaries adjacent to individual resources or districts other than the height limits set out by its code. RWC has been successful in motivating landowners to designate their buildings as landmarks and agree to inclusion of their properties in historic districts.</p>	<p>Pending further review by the CEQA team (PlaceWorks/ Origer) and also by the Design team (Opticos/ Garavaglia). If deemed acceptable by the two teams, this approach will likely be incorporated in the Final Precise Plan. Conforming revisions to Chapter 5 and Chapter 9 (Form Based Code) will be made as appropriate.</p>
<p>8. (P 122-125) Apply Redwood City's DTPP development standards regarding historic resources, including adjacency and on-site improvements. RWC's Historic Resource Advisory Committee applies the following standard: If a proposed improvement does not render a resource ineligible for National Register listing it's permissible. In addition, the RWC HRAC takes into consideration the evolving context around a resource. For example, the context at the time a resource was constructed may be considerably different than what now exists or what is anticipated by the DTPP. A modest scale wood frame residence may be a remnant of the small-town context that existed in the 19th century but is not reflective of its current 21st century urban context.</p>	<p>Pending further review by the CEQA team (PlaceWorks/ Origer) and also by the Design team (Opticos/ Garavaglia). If deemed acceptable by the two teams, this approach will likely be incorporated in the Final Precise Plan. Conforming revisions to Chapter 5 and Chapter 9 (Form Based Code) will be made as appropriate.</p>

COMMENT	RESPONSE
<p>9. (P. 118) Adjustments to Historic Districts Boundaries. SRH observed that the proposed district boundaries in the DTPP extend beyond areas with a cohesive context and seem to be configured to reach out to individual resources. We recommend the district boundaries be revised to conform to areas with an intact context. Historic district boundaries should be established to maintain and emulate the traditional main street character of 4th and B streets, with buildings fronting directly on the sidewalk and a variety of period examples of architecture with different heights from the mid 19th century to present. We recommend focusing the proposed districts on those streets.</p>	<p>Staff will be making adjustments to the proposed boundaries in response to the more specific comments below (see comments 11-14).</p>
<p>10. (P. 118) The Latham Street neighborhood has an intact context and may be considered for designation as a historic district in the future. SRH also notes there are no specific actions, procedures or timetables identified to establish historic districts and would like to see this addressed.</p>	<p>Latham Street was identified as one of four potential “Neighborhood Conservation Districts” in an earlier draft of the Precise Plan. There was almost no support for the designation of such districts as part of the DTPP (by the General Plan Steering Committee) and the idea was not further pursued. The concept of Conservation Districts (in general) is supported by the General Plan and the Downtown Plan, and could be pursued in the future after the Plan is adopted.</p>
<p>11. (P. 118) West Downtown Core District: Include only the parcels on both sides of 4th St from the two parcels on the west side of E St (the former automobile dealership at 1504 4th and parcel on the south side of the street) to A St. Re: B Street: Include the parcels on both sides of B Street from 4th street to south of 2nd St including the Cosmopolitan Hotel, 747 B St and the resources on either side of the former RR ROW of way on the east side at 720 B St.</p>	<p>We concur with contracting the boundary to exclude the E Street corridor, although the parcel at the SW corner of 4th and E should not be included. Inclusion of 747 B Street will be evaluated; other properties on the west side of B Street will likely not be added. Resources on either side of the former RR ROW at 720 B Street are already included.</p>
<p>12. (P. 119) East Downtown Core District: Include parcels along 4th Street from the west as shown on figure 4.5-4 to Tamalpais Avenue including the NWP Depot Building at 930 Tamalpais.</p>	<p>Extension of the eastern district along 4th Street to include 930 Tamalpais will be evaluated, based on the integrity and eligibility of the resources on the intervening properties. There are roughly a dozen properties that would be impacted and only three were rated eligible as individual resources or contributors.</p>
<p>13.(P. 119) West End District: SHR recommends identification of a potential West End District including the parcels along 4th Street from E Street to H Street (including 1 H Street, the Pacific Telephone & Telegraph building).</p>	<p>This area was evaluated for its potential as a district but found to be ineligible at this time. It could be reevaluated again in the future.</p>
<p>14. (P 121) We recommend the DTPP clarify the district designation process and a proposed timetable.</p>	<p>P 121 column 2, para. 2 notes that formal designation of districts is a follow-up action that could be pursued based on property owner interest after the DTPP is adopted.</p>

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<p>15. (p. 120) As currently proposed, the (Historic Resources Advisory Committee) would have a member of the Planning Commission, DRB and a community member appointed by the Planning Commission. Qualifications of the members is intended to reflect a broad knowledge in areas such as construction and downtown business concerns but surprisingly doesn't speak to its core historic preservation function. This may be reflective of a desire to protect the interests of property owners, a laudable objective, but not reflective of the committee's core responsibilities. A key principle that has evolved over the approximately 40 years of the Redwood City (RWC) HRAC's function has been a narrow focus on historic preservation as defined by the municipal code and the DTPP; mission creep is avoided. Land use and design matters are left to others. The key requirement is a commitment to historic preservation. SRH recommends five members appointed by the Planning Commission based on the RWC model. We recommend assignment of a member of the Community Development staff with professional knowledge in preservation to act as the general liaison preparing the agenda and staff reports. Staff planners assigned to specific projects would be responsible for the project staff report and presentation to the HRAC.</p>	<p>All comments noted. Spelling out the detailed criteria for membership on an HRAC is beyond the scope of the Precise Plan. The bulleted list and narrative regarding membership is only intended to illustrate various options that might be considered by the City. Further discussion of membership would occur in the future. The General Plan Steering Committee expressed that it was critical that a diverse range of perspectives be represented, including businesses and property owners.</p>
<p>16. (P 120-121) In recognition of funding limitations SRH recommends using preservation mitigation fee exactions for support of historic preservation activities such as but not limited to, regular updates to the historic resources inventory, staff support for a HRAC, funding landmark designations, and interpretive signage.</p>	<p>We concur that the concept of mitigation fees merits additional consideration and will mention it in General Plan 2040, rather than the DTPP.</p>
<p>17. P 104-106: Include a concise summary statement in the Context Statement and DTPP policy. A defining characteristic of Downtown San Rafael is that 4th Street and B Street are unusually intact examples of a prosperous small American main street. They exhibit good quality representative buildings from each stylistic period from the mid 19th century through the present. This context includes street walls with few interruptions such as parking lots and driveways. These urban design characteristics shall inform future development downtown. In addition to preserving and restoring landmark and contributory building facades to their period of construction, future interruptions to the street wall must be carefully considered and new construction should reflect its period in</p>	<p>We concur with the conclusions and will look for opportunities to incorporate this text, potentially in lieu of the boldface text on page 104 (below the Section 5.1 heading).</p>

COMMENT	RESPONSE
time while respecting the existing historic scale and context.	
<p>18. The National Park Service State Office program for Certified Local Governments in Historic Preservation (CLG) is administered by State Historic Preservation Offices. This program allows CLGs to apply for federal and state grants and is a prestigious designation. A CLG must meet the following minimum goals: (a) Establish a qualified historic preservation commission (such as a HRAC); (b) Enforce appropriate State or local legislation for the designation and protection of historic properties. In most cases this is done in the form of a local ordinance; (c) Maintain a system for the survey and inventory of local historic resources; (d) Facilitate public participation in the local preservation, including participation in the National Register listing process; (e) Follow additional requirements outlined in the State’s CLG Procedures. Each state has Procedures for Certification that may establish additional requirements for becoming a CLG in that State. The Precise Plan should commit to policies, actions and a timeline to achieve CLG status for San Rafael. Meet the qualification standards for certification; and Apply to the State Historic Preservation Office (SHPO) for Certification.</p>	<p>This is a citywide issue and as such should be addressed in the General Plan rather than the precise Plan. As the City does not have a Historic Preservation Commission and is not proposing to create one at this time, it is unclear whether it would qualify as a CLG. The General Plan will include a program to explore CLG designation, including the viability of qualifying with a Historic Resources <i>Advisory Committee</i> rather than a formal Commission.</p>
Letter from Sustainable San Rafael to Design Review Board: February 17, 2021	
<p>This letter was provided to the Design Review Board in the advance of their meeting on February 17. It makes the same points as those made in the letter to the Planning Commission dated January 12. Responses to the January 12 letter have been previously provided as part of the Planning Commission’s February 9 agenda.</p>	
Letter from Golden Gate Bridge District (received on Jan 11, but treated as EIR comment)	
<p>1. Page 155. Page Figure 6.23 should be updated to show:</p> <p>A. A high frequency bus route along the following street segments:</p> <ul style="list-style-type: none"> ▪ Tamalpais Av between 2nd and 3rd Streets ▪ 2nd and 3rd Streets between Tamalpais Av and Hetherston St, and between Irwin St and Grand Av ▪ Grand Avenue south of Third Street <p>B. A moderate frequency bus route along 3rd St from Tamalpais Avenue to Cijos St and along Cijos St from 3rd St to 4th St. This routing operates in the westbound/northbound direction and is a companion to the eastbound route already depicted on Fourth Street between Cijos and Hetherston St.</p> <p>C. A low frequency bus route should be removed from C Street and added to Lincoln Avenue south of Second Street.</p>	<p>Figure 6-23 will be edited to make these changes.</p>

COMMENT	RESPONSE
<p>2. P 158, 159, 160. The street transformations for Fourth Street (between H and E Streets, between E Street and Tamalpais Avenue, and between Tamalpais Avenue and Hetherton Street) propose travel lane widths of less than 12 feet. While this is sufficient for streets with two travel lanes in the same direction, lanes widths should be 12 feet on bi-directional two-lane streets that have bus service.</p>	<p>Response will be prepared as part of the EIR response to comments process.</p>
<p>3. A project to replace the transit center is currently undergoing environmental review. Depending upon where a future facility is sited, the need for 12-foot travel lanes may also apply to the segment of Fourth Street between Irwin Street and Grand Avenue. In addition, while existing bus service operates only in the eastbound direction of Fourth Street between Cijos and Hetherton Streets, this service may become bidirectional as part of a relocation.</p>	<p>Response will be prepared as part of the EIR response to comments process.</p>