

June 15, 2021

San Rafael Planning Commission

1400 Fifth Avenue
San Rafael, CA 94901

Via email: barry.miller@cityofsanrafael.org; lindsay.lara@cityofsanrafael.org

PLEASE INCLUDE THIS 4-PAGE LETTER IN PUBLIC COMMENTS for the Planning Commission hearing on June 15, 2020, for the draft General Plan 2040/EIR

Dear Planning Commissioners:

Please adopt the following recommended wording changes:

Chapter 3. Land Use:

a.) Proposed wording changes:

Policy LU-2.6: Lot Consolidation

Encourage the consolidation of small (<6,000 SF) lots zoned for higher density residential, commercial, and mixed uses in order to create more viable development sites. Encourage consolidation of hillside lots which are difficult to develop because of size or slope or have difficult fire and emergency access. Lot consolidation can provide greater flexibility in site planning, make it easier to meet parking and access requirements, hillside development standards and enable building sizes and dimensions that are more economically viable and compatible with the surrounding neighborhood development pattern.

Program LU-2.6A: Lot Consolidation Incentives. Continue to encourage small lot consolidation through zoning regulations. Incentives such as height and floor area bonuses and reduced parking should be considered, provided they do not result in the loss of unique or historic buildings or impede emergency vehicle access.

Program LU-2.12D: Accessory Dwelling Units. Continue to support the conversion of underutilized residential space into accessory dwelling units (ADUs) and Junior Accessory Dwelling Units (JADUs), as well as the development of new ADUs and JADUs in residential areas except where access difficulties for fire and emergency vehicles pose risks to public health and safety.

Chapter 4. Neighborhoods:

Some corrections need to be made to the West End neighborhood description. The West End neighborhood also includes some residences along Second St so we have included references to Second Street in our description (2nd para, 6th line):

The community would like increased pedestrian and bicycle safety improvements, including improvements in the nearby ~~West End Village~~ along Second Street and at the busy crossing involving Second, Third, Fourth, West End and Marquard Streets. Pedestrian pathways, stairways and trails make the neighborhood more walkable. Landscaping improvements and maintenance of medians along Second Street, the Miracle Mile and West End Avenue, as well as attractive setback landscaping along all streets, increase the beauty and value of the neighborhood. Tree planting, in addition to the preservation and protection of existing trees, should be included in new development to maintain and enhance this character.

West End Speaks, recommended edits:

3. Limits to ~~building hillside homes on steep hillsides, particularly south facing,~~ to mitigate erosion, landslide prevention, and native tree removal. **QUESTION: Why just south-facing hillsides? We have north-facing hillsides that are subject to the same problems.**

5. Complete ~~ion~~ of the Grove Hill Estates pathway established in 1983, a trail connecting 5th Avenue and Tamal Vista Drive, as designated on City maps.

Chapter 5. Community Design and Preservation:

Program CDP-3.6A: Mitigation for Tree Removal. Continue to implement mitigation requirements for tree removal in new development. When necessary, this could include planting of trees in locations other than the project site, planting native trees in lieu of non-natives, or reducing the footprint of proposed development. To calculate the replacement requirements of trees removed, the number and type of trees planted ~~Tree replacement value~~ should be based on a value that is equal to or greater than the carbon footprint and ecological benefits of the trees being removed. Ecological benefits include water conservation, absorption of runoff, reduction of air pollution, energy reduction from shade and cooling effects, soil retention, ~~and~~ slope stabilization, and wildlife support. In addition, being designated as a "Tree City," we must consider the aesthetic beauty that a single mature tree or grove of trees provide by softening the surrounding hardscape and bringing joy to residents.

Chapter 6. Conservation and Climate Change

a.) Question: What "tree regulations" are you proposing to "revise"; please refer to SRMC or an ordinance number? Proposed paragraph to replace existing wording:

Program C-1.16C. Tree Preservation.

Adopt a tree ordinance to define protected and heritage trees, limit the removal of trees of a certain size, require equivalent replacement when trees must be removed, and establish permit requirements and procedures for tree removal and protection.

Define California redwoods (*Sequoia sempervirens*) as a protected species, along with other native trees.

Policy C-1.17: Tree Management:

Proposed wording changes/addition:

Strongly encourage the preservation of healthy, mature trees when development and/or construction is proposed. Site plans should indicate the location of existing trees and include measures to protect them where feasible. Require a tree management plan prepared by a licensed arborist using published standards and practices for protecting and monitoring the health of the existing trees both during and post construction.

c.) Add the following program:

Program C-1.17A. Tree replacement policy.
Adopt a tree replacement policy that reduces our carbon footprint and aligns with the City's policies for Climate Change. Rather than require tree replacement of 3:1, without regard to size, and frequently settling for a noncompliance fee, require tree replacement based on a calculation of energy costs savings, runoff absorption, wildlife support, carbon absorption, fire hazard mitigation, and beauty that is equal to or greater than the trees that are removed.

Chapter 8: Safety and Resilience Element

Policy S-2.2: Minimize the Potential Effects of Landslides. Minor edit, change "a" to "the":

Development proposed in areas with existing or potential landslides (as identified by a Certified Engineering Geologist, or Registered Geotechnical Engineer, or the LHMP) shall not be endangered by, or contribute to, hazardous conditions on-a the site or adjoining properties.

Chapter 10. Mobility Element:

Program M-6.3A: Implementation of Pathway Improvements.: add the following bulleted item:

- Complete Grove Hill Estates public pedestrian path along the easement adopted in 1983 to connect Tamal Vista Drive to the Sun Valley neighborhood.

Policy M-7.3: Parking Technology, pg 10-47

Use technology to improve parking efficiency and reduce the land area required to meet parking needs, where feasible.

Chapter 11. Community Services and Infrastructure:

Policy CSI-3.2: Mitigating Development Impacts

Engage the Police and Fire Departments in the review of proposed development and building applications to ensure that public health and safety, fire prevention, and emergency access and response times meet current industry standards. ~~needs are considered and effectively addressed.~~

Appendix F: Geotechnical Review Matrix, Exhibit HH, Pg. F-11:

Add to the bottom, under NOTE:

For Hillside lots with an average slope greater than 25%, refer to the Hillside Residential Guidelines Manual, Appendix C for Geotechnical/Hazardous soils review

Sincerely,

Victoria DeWitt
West End neighborhood resident