

**Pamela Macknight**

**2/3/2024**

This is being built without public review. No one seemed to have any awareness until now for what you have approved to build there. It is like you are doing this behind the scenes because you know all of Terra Linda. Lucas Valley and Marinwood would not allow this.

This should never gotten this far without better public involvement.  
It is too dense. You are building a city inside a town.

You have not required the developers to contribute to the surrounding roads, schools, police and fire services needed to support this huge increase in use and population.

Air and noise generated from it is at such high levels it is pollution.

The increase of water needed is beyond what is available without making the public pay even higher increases.

How can you make all of us pay for what the developers should be required to pay for. They are profiting at our expense.

**NORMAN WOLFF**

**1/26/2024**

PLEASE INCLUDE SMITH RANCH ROAD CORRIDOR IN YOUR REDEVELOPMENT EFFORTS:

- 1) DEER VALLEY RD (OFF SMITH RANCH RD) SHOULD BE CHANGED TO A CITY MAINTAINED RD. THE CITY OPEN SPACE RIDGE ABOVE THE DEER VALLEY APTS AND THE CITY POND BELOW THE APTS AT JCT WITH SMITH RANCH ROAD ARE HORRIBLY NEGLECTED. TRASH IS A MAJOR PROBLEM. POND AREA IS BADLY OVERGROWN. THIS AREA NEEDS IMMEDIATE ATTENTION.
- 2) RETAINING WALL ON SILVEIRA PKWY HAS BEEN COLLAPSING FOR YEARS AND SHOULD BE REPLACED. EXISTING WALL LOOKS TEMPORARY AND IS PROBABLY THE ORIGINAL. NEW WALL MIGHT REDUCE TRASH ACCUMULATION. THIS RETAINING WALL NEEDS IMMEDIATE ATTENTION.
- 3) NEW NORTHGATE DEVELOPMENT SHOULD HAVE A NEW LIBRARY THAT IS A COMBO OF THE EXISTING COUNTY LIBRARY AND THE CITY LIBRARY. CIVIC CENTER SPACE OLD CARNEGIE BLDG CAN BE USED FOR OTHER THINGS (SUCH AS LAW LIBRARY AND MUSEUM).
- 4) THE ENTIRE CIVIC CENTER COMPLEX SHOULD BE TURNED INTO A MUSEUM AND FLW MONUMENT. THERE ARE OTHER POSSIBLE USES FOR THE FLW CIVIC CENTER.
- 5) THE NEW NORTHGATE PROJECT SHOULD INCLUDE A NEW CIVIC CENTER BUILT ON TRADITIONAL CLASSICAL LINES.

**Bobbi Ryals**

**1/24/2024**

I have lived in the Quail Hill townhouse community for over 25 years. I strongly oppose the construction of a seven story building on Northgate Drive. It will impact the Quail Hill residence and our property values very negatively.

We do not want a seven story building in our face, which will completely destroy our view and create noise and traffic for our mostly senior community.

Please consider relocating the seven story building to the opposite side of Northgate, across from the cemetery, which is non-residential and will not have a negative impact on our residents.

We at Quail Hill are extremely concerned about this, and strongly oppose it.

Put yourselves in our shoes. Would you like a seven story building in your face, I don't think so. This is a very poor decision, which will have a very negative environmental impact on our community.

We urge you to relocate the 7 story building to the non-residential side!  
Please.

Thank you,

Bobbi Ryals  
Quail Hill

**NORMAN WOLFF**

**1/19/2024**

The New Northgate must include a combined city/county public library. The space under the Civic Center dome can then be used the the County Law Library. The new Northgate mega-library could also include the Marin History Museum. The Kent California Archive already has a climate-controlled satellite facility on Los Gamos. The Carnegie Library building in San Rafael can be used for something else altogether.

THE SMITH RANCH ROAD CORRIDOR SHOULD BE INCLUDED IN THE NORTHGATE REDEVELOPMENT. THERE IS A TERRIBLE PROBLEM WITH TRASH ALONG SMITH RANCH ROAD, ESPECIALLY AROUND THE JUNCTION WITH DEER VALLEY ROAD.

THAT HORRIBLE CITY POND BELOW DEER VALLEY APTS NEEDS A COMPLETE RE-MAKE. IT IS A MAGNET FOR OLD MATTRESSES AND A LOT OF OTHER TRASH. IT PROBABLY ALSO BREEDS MOSQUITOES IN SUMMER. IT IS A DISGRACE.

THE CITY OPEN SPACE RIDGE BEHIND THE DEER VALLEY APTS IS HORRIBLY NEGLECTED.

THE RETAINING WALL ALONG SILVEIRA PARKWAY HAS BEEN COLLAPSING FOR YEARS. IT IS ALMOST CERTAINLY THE ORIGINAL WALL, PROBABLY BUILT BY THE SILVERIA FAMILY. IT NEEDS TO BE REPLACED AS AN EMERGENCY PRIORITY BEFORE SOMETHING REALLY BAD HAPPENS.

THESE ISSUES ALONG THE SMITH RANCH ROAD CORRIDOR MUST BE ADDRESSED.

**Clara Munoz**

**1/17/2024**

I would like to keep our mall I don't like the idea to put it down this is a place to gather do shopping movies etc, you guys already messed up the first mall that we had it was fun and it was great under a roof we had a place to hang out play take the kids shop eat we had enough good stores to shop all inside for rainy days cold freezing days even hot days we really miss that it felt like home all the community together we never liked the remodeling into an open mall but still is our mall we still enjoy it!.please stop ruining the fun do something for the community to have fun find another place to build homes and put the mall back together under a same roof this all that we have for our community to call our mall on our city. We beg you let our mall and improve it instead. Thank you!!

**Scott Lynch**

**1/9/2024**

Please make this happen. I was born in Marin and had an amazing childhood and I want the same for my future kids, but that will never happen unless housing prices normalize. I don't ever expect prices to come down to the levels they were when my parents first moved here but things have gotten out of control. Everyone knows it, there's absolutely no denying it, and there is only one solution. Build. At the end of the day when places don't build and have high prices you end up excluding a lot of certain people. Let's stop doing that. Marin is one of the most beautiful places on earth and more people should get to experience that, including, hopefully, my future children.

**From:** Alan Jones [REDACTED]  
**Subject:** Comments on DEIR for Northgate  
**Date:** February 12, 2024 at 9:41 AM  
**To:** april.talley@cityofsanrafael.org



City of San Rafael Planning Commission  
c/o April Talley

Attached please find written comments on the DEIR for the Northgate Town Square project prepared by me on behalf of a group of Villa Marin residents. Please make it a part of the record for the forthcoming Planning Commission hearing. Several of us plan to be present and make further comments in person. If your procedures permit it would make sense for us to bring our remarks together as a group.

Regards,

Alan Jones, Architect

**Comments on Northgate DEIR**  
**.pdf**  
21 KB



February 12, 2024

From: Alan Jones, Architect, on behalf of residents of Villa Marin, 100 Thorndale Drive,  
San Rafael 94903.

**To: Planning Commission, City of San Rafael**

Subject: Comments on the Draft Environmental Impact Report, Northgate Town Square

Ladies and Gentlemen:

As the nearest residential neighbors to the proposed Northgate re-development, and owner/occupants of a lively and highly successful high density housing development, we are called upon to submit our evaluation of the Draft EIR. While some of our remarks may extend to details of the design which are not, strictly speaking, EIR issues we ask that you bear with us as, in our opinion, details of the design will have profound bearing on the success of the project, it's relationship to the surrounding community, and ultimately it's true environmental impact.

**Summary:**

Our community, together with the adjacent office complex and surrounding dedicated open space, occupies approximately 37 acres. Based on a total square footage of approximately 500,000 excluding parking, this amounts to an FAR of approximately 0.31. This includes substantial hillsides of true open space. We see hawks from our windows and hear Coyotes at night.

The existing Northgate Mall consists of approximately 766,507 SF on a 45 acre site, yielding an FAR of approximately .39 excluding parking. At full build-out the proposed development would reach an FAR of over 100% according to the numbers given in the DEIR. That is over two and a half times more dense than the existing Mall, our hillside, or any other nearby development. Hawks and Coyotes had best stay away!

We favor replacing the existing under-used commercial space with vibrant and sustainable mixed use development. It is possible to visualize a development which would enrich and enhance the neighborhood while providing needed housing, lively commercial enterprises, and useable open spaces for the residents and neighbors alike. The proposed development accomplishes none of these objectives, as we will outline below.

### **Starting Basis of the Evaluation:**

While it may be too late to modify the assumptions made at the very beginning of this DEIR, we would suggest that they are faulty and that they argue for a rejection of the study. While it is true that the application was filed during Covid when Mall usage was low, it has been at least 15 years since Northgate was operating at its full capacity. Even then usage, we suspect, had fallen from its maximum theoretical use level. To have the beginning level of comparison for this report be a lively and fully functioning Mall is a fiction, consideration of which can only benefit the applicants to the detriment of neighbors.

### **Alternatives:**

Again, while it may be too late to change the submission, the "alternatives" listed in the report are a kind of joke and can only be said to serve the interests of the applicant. For those who feel, as we do, that a sensible alternative would be something on the order of half the size of the current proposal, where is the option to consider such an alternative? Given the extremely limited choices given in the proposal, we must recommend that the first option, "no project alternative," be selected. This would demand that the developer come back with a proposal which takes into account its neighbors.

### **Relationship to the Community:**

It is vital that a viable mixed use community be open to and reflective of the larger community which surrounds it. Shopping Malls notably ignore this principal, depending instead on an influx of automobile traffic from much further away. Thus, in developing mixed use on a Shopping Center site, our eyes should be turned toward re-building any connections which might re-establish this relationship. Unfortunately the developers have failed to reach out to the community for suggestions in this regard. In fact the proposal, on the North side, retains the existing vast acres of parking while adding "pads" which, according to the illustrations, are locations for Fast Food outlets. This only adds to the sense of isolation and would contribute to traffic congestion from outside. On the South, East, and West sides the development would add massive residential buildings which would create an imposing wall, with only limited strips of planting separating them from the street.

### **Density of Development:**

There are no planning documents in Marin County, that we are aware of, which permit a Floor Area Ratio of 100%. Whether or not you agree that the State density bonus has been applied correctly in this case, the resulting density surely requires an extensive analysis of all of its impacts.

The first, and most dramatic, is that the blocks of buildings immediately create an immense wall which separates the area from its surroundings and makes an unfriendly gesture to the community.

Secondly, the proposed density creates challenges for public services of all kinds, including police, fire, schools, library services. In addition water, electricity, sewer services, and other utilities will be needed, putting a strain on services to the existing community.

Thirdly, while one could argue that the existing Mall is not a mecca for biological resources, the extent and scale of the buildings envisioned here could well create a hazard for wildlife in adjacent areas.

### **Need for Housing:**

While there are studies that indicate that housing is needed in Marin, they are primarily focused on the need for affordable housing. The proposed project does provide affordable housing, just enough to qualify for the density bonus, by including units which are relatively small and many of which are located in a corner of the site. This approach is cynical at best and greedy at worst.

There is no clear indication that the proposed market rate housing, in the form of high rise blocks, will be in demand in Marin. The population of Marin has recently experienced a decline. If all these units are built at once and fail to rent readily, what will be the impact then on the surrounding community? Would it not make sense to develop a smaller project and proceed incrementally to test the market?

### **Open Space:**

Viable and useable open space depends on much more than a small square identified on a plan. It must have abundant sunlight, be quiet and attractive, and ideally easy to get to by walking without crossing busy streets. It must be large enough that one feels at least a small measure of the natural world. I think it is safe to say that none of the

open spaces designated on the Northgate plan would meet these conditions. By our informal calculation, there is not a single bit of "open space" on the plan which is more than 75 ft. from a car, parked or moving. At the very least, in keeping with the "Town Square" name of the project, the entire area at the center of the project, presently designated to be occupied half by parking, should be an open park. Furthermore the roads which cross the center of the project should be re-routed to allow a family out for a stroll to avoid the risk of busy traffic.

Separate from the main square, other designated "open spaces" are questionable. Anything adjacent to the 7 story blocks will likely be shady and windy. There is an existing area designated as open space, adjacent to the restaurant space on the Northwest corner of the commercial area, which many of us are familiar with. While it does have planting and is not unattractive, one never sees anyone lingering there. Too much in the shade and directly opposite the parking lot. Most of the "open space" shown on the proposed plan, sadly, meets just this description.

### **Transportation:**

While the location has access to public transportation, nothing in the proposal that we have seen is being done by the developer to enhance this access. In fact the development will remain, as in its current condition, an island of development surrounded by busy streets. At the very least, one or several areas for access to busses should be provided. Connections to Merrydale Road and the SMART train should be enhanced and access encouraged.

Pedestrian access is almost entirely along interior and surrounding sidewalks. There will not be the opportunity for a quiet stroll or enjoyment of the public spaces which might help mitigate the Vehicle Miles Travelled by encouraging people to take advantage of local facilities and avoid getting in their cars.

Bicycle path improvements are minimal for a development of this scope. Existing bike paths surrounding the development are referred to but little in the way of improvements to bike and pedestrian access are proposed. And many designated bike areas on the interior of the project are shared with pedestrians or cars. A project of this scope should have a serious plan for designated bike use throughout.

**Pollution:**

Our residents, and others living nearby, will be subject to several years of elevated air and noise pollution. While we have no basis for scientifically accessing this impact, it would surely be cut approximately in half by limiting the project to half the size.

**Conclusion:**

The Planning Commission should recommend that the alternative of "no project" be selected and that the developers be asked to return with a proposal of a much more modest size, after consulting with representatives of the surrounding community. There is an opportunity here to truly create an example of viable and sustainable mixed use. Sadly, the current proposal falls far short of that goal.



**From:** Jeanine Larrea [REDACTED]  
**Subject:** Comment to Proposed Northgate Mall Project DEIR  
**Date:** February 10, 2024 at 10:14 AM  
**To:** April Talley April.Talley@cityofsanrafael.org, Planning Public Comment PlanningPublicComment@cityofsanrafael.org,  
Rachel Kertz Rachel.Kertz@cityofsanrafael.org  
**Cc:** Jeanine Larrea [REDACTED]

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Dear Ms. Talley, Ms. Kertz and the Planning Commission,

Attached below is my comment to the Northgate Mall Project DEIR. Thank you in advance for your consideration.

Best,

Jeanine Larrea

Northgate Mall Development  
Project Letter.pdf  
37 KB



February 10, 2024

RE: Proposed Northgate Mall Development Project and Draft EIR

Dear Planning Commissioners,

I am writing in reference to the proposed Northgate Mall residential and commercial development project. I wholeheartedly agree that additional residential housing is needed in Marin County and throughout the State of California to address the housing shortage that currently exists. However, as set forth below, I am opposed to the Northgate Mall development project (“the Project”) as it is currently proposed.

### **I. The Project Would Unduly Burden the Terra Linda Community**

The San Rafael Housing Element 2023-2031 identified over 100 sites for housing opportunities to satisfy the City of San Rafael’s plan for 3,220 residential units by 2031. The Project proposes to build up to 1,442 residential units at the Northgate Mall site. This would result in one community alone, Terra Linda, shouldering the brunt of approximately 45% of the new 3,220 residential units specified in the San Rafael Housing Element. This is far from a fair distribution of new housing throughout the city and would be unduly burdensome for the community of Terra Linda. Destroying the long standing infrastructure and character of Terra Linda and the patterns and daily lives of its residents, as discussed below, should not be the answer to Marin County’s housing shortage.

#### **1. The Project likely would inundate Terra Linda’s road network**

One of several examples of the negative, disproportionate impact to Terra Linda is the large traffic increase that would occur. I disagree strongly with the Transportation Impact Study’s finding that the Project “would result in a reduction in traffic on the surrounding roadway network” and will not contribute to failing levels. (See Transportation Impact Study, p. 33) Common sense clearly indicates otherwise and the Study’s findings stretch the bounds of credulity.

Adding up to 1,422 housing units and thousands of additional residents (many of whom will own vehicles) likely would result in significant traffic impacts beyond the capacity of the current road network. Notably, this is not a realistic transit oriented development (TOD) site - SMART does not carry a significant number of passengers and it does not travel to high density work sites. In fact, studies have shown that persons often are not willing to take multi-modal transports to their work sites so mass travel to the Larkspur Ferry and then to San Francisco is highly unlikely. Further, given that the Northgate Mall site is so close to downtown San Rafael, there is no reason to believe that the new residents commuting to downtown San Rafael would act any differently than existing residents who overwhelmingly commute and travel via single occupant vehicles. As such, it is highly probable that the thousands of new residents would significantly contribute to increased traffic load on local streets and regional arterials. Again, commute numbers going north are minimal on SMART and there are no traffic delay incentives to encourage transit ridership in the reverse commute direction so SMART really would not act as a transit oriented development (TOD) site for this project.

2. The Northgate Mall Project likely would cause dangerous overcrowding of evacuation routes and negatively impact emergency response times

In addition, I am deeply concerned that the Project would delay emergency response times and obstruct safe evacuation routes in case of natural disasters due to the limited road network in the Northgate Mall and surrounding residential and commercial areas. The Transportation Impact Study's finding that the Project would have a "beneficial" impact on emergency response times defies logic. (See Transportation Impact Study, p. 33). Without vastly improving the current road network, basic common sense clearly indicates that such a large population and vehicle increase in a condensed area with a limited road network would cause potentially dangerous, and perhaps life threatening, conditions due to emergency response time delays and roads overwhelmed with vehicles if a sudden evacuation of the greater community were necessary.

**II. The Northgate Mall Development Project Is Not Compatible With and Does Not Enhance the Existing Community Character**

The massive number of new residences and huge size of the residential buildings (up to seven-stories high) proposed by the Project are not compatible with and do not enhance the existing community character. In fact, they actually would ruin the quiet, bucolic nature of Terra Linda which is comprised largely of single story family homes, senior living facilities and a cemetery.

Terra Linda is not a bustling mini-metropolis as envisioned by the Project and would certainly not be enhanced by it. I moved to Terra Linda from San Francisco (and Manhattan before that) to escape the noise, hassles and inconveniences of city life and to enjoy a more peaceful suburban setting. Forcing me and my fellow neighbors to live next to a construction zone for the next 20+ years and thousands of new, additional residents and a series of massive residential buildings just half a block away from my home would irrevocably and detrimentally alter my quality of life and that of the Terra Linda community at large.

Further, the significant height of the proposed residential buildings (up to seven-stories tall) would obstruct the view corridors for a number of Terra Linda's residents and would create an oppressive environment for the neighborhood. Instead of wide open and expansive vistas as we walk throughout our neighborhood, we would be faced with huge buildings blocking the open air, trees, hillsides and open space that we currently enjoy. We do not want to live in a mini-Manhattan and should not be forced to do so.

The Project developers attempt to justify the height and scale of the buildings by comparing them to Macy's and Kohl's. However, Macy's and Kohl's are not seven-stories and, significantly, they are located in a part of the Mall site that is much farther away from the existing residential neighborhood than the proposed new residential buildings would be.

Notably, according to Phase II of the Project proposal, Macy's and Kohl's will be demolished. As Macy's and Kohl's eventually will be demolished anyway, I do not understand why the Project would locate the new residences so close to the existing residential neighborhood. Instead, the Project developers should place all of the proposed residential units on the North side of the Mall site (where Rite-Aid and Macy's and their parking lots currently are located) so the new residences are not immediately adjacent to and practically on top of the existing neighborhood. Preserving the well being of the larger community is certainly worth modifying the Project in this way regardless of any excuses the developers might raise.

### **III. The Planning Commission Should Responsibly Balance the Need for Additional Housing with the Goal of Preserving the Nature of San Rafael's Communities**

#### 1. A reasonable plan for housing development at Northgate Mall should be the goal

To be clear, I am not against building any residential housing at Northgate Mall and there are parts of the Project I very much appreciate, such as a Town Center concept to improve community vitality. However, as the Design Review Board stated during its review, the Project in its current iteration is just too big.

Reasonability and moderation should be key principles here, especially when the quality of life for so many will be dramatically impacted. If well designed, a proposal of 300 to 400 new residential units would provide much needed new housing, maintain the current character of the neighborhood, and not overburden the local road network. It should be noted that a project of this size (300 to 400 units) would be the largest housing development in the history of San Rafael. Locating all of the new units at the North side of the Mall site, farther away from the existing residential neighborhood and closer to the transit and transportation network (the efficient use of which is a purported Project goal), would be a much more reasonable approach. This would create more open space throughout the site and a better transition to the single family home neighborhood as well as improve traffic circulation for new and existing residents. This also would be far more likely to accomplish both objectives of developing new housing while preserving the character and quality of life of the Terra Linda community. If done correctly, I believe this would make the Project far more palatable to existing residents.

#### 2. Distributing new housing more equitably throughout the City of San Rafael would prevent a significantly disproportionate impact to one community alone

The traffic and other issues discussed above are just a few examples of the significant impacts to Terra Linda under the current Project. To prevent this, new housing should be distributed more fairly and equitably throughout the region. Therefore, every community would obtain the benefits of additional housing, new residents would have a choice of neighborhoods in which to live, and the impacts from new housing development would be distributed and better absorbed across a broader area thereby dissipating them and greatly reducing any disproportionate impact to one community.

Thank you for your consideration.

Very truly yours,

Jeanine Larrea  
Terra Linda Resident

**From:** Emily Betts [REDACTED]  
**Subject:** SMART Comments on Northgate Town Square EIR

**Date:** February 12, 2024 at 12:37 PM

**To:** April.Talley@cityofsanrafael.org

**Cc:** margaret.kavanaugh-lynch@cityofsanrafael.org, Derek McGill [REDACTED], Cathleen Sullivan [REDACTED], Ron Downing [REDACTED], Eddy Cumins [REDACTED]

April,

Please see attached comments from SMART on the Northgate Town Square EIR. Please reach out to me with any questions.

Thank you,

Emily

Emily Betts  
Principal Planner  
Sonoma-Marín Area Rail Transit District  
5401 Old Redwood Highway, Suite 200  
Petaluma, CA 94954  
Office: 707-794-3324  
Mobile: 415-385-6914  
[www.sonomamarintrain.org](http://www.sonomamarintrain.org)



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with any attachments.

**SMART Letter\_Northgate Square  
Feb 2024.pdf**





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Marin County Board of Supervisors

**Melanie Bagby, Vice Chair**  
Sonoma County Mayors' and  
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**Kate Colin**  
Transportation Authority of Marin

**Chris Coursey**  
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**Patty Garbarino**  
Golden Gate Bridge,  
Highway/Transportation District

**Barbara Pahre**  
Golden Gate Bridge,  
Highway/Transportation District

**Gabe Paulson**  
Marin County Council of Mayors and  
Councilmembers

**David Rabbitt**  
Sonoma County Board of Supervisors

**Chris Rogers**  
Sonoma County Mayors' and  
Councilmembers Association

**Mary Sackett**  
Marin County Board of Supervisors

**Eddy Cumins**  
General Manager

5401 Old Redwood Highway  
Suite 200  
Petaluma, CA 94954  
Phone: 707-794-3330  
Fax: 707-794-3037  
[www.SonomaMarinTrain.org](http://www.SonomaMarinTrain.org)

February 2, 2024

Margaret Kavanaugh-Lynch, Planning Manager  
Community Development Department  
1400 Fifth Avenue, Top Floor  
San Rafael, CA 94901

Dear Ms. Kavanaugh-Lynch,

Thank you for the opportunity to review the draft EIR for the proposed Northgate Town Square development. We are excited to see this project moving forward, which will provide high-density multifamily residential near the SMART Marin Civic Center Station as well as an improved bicycle and pedestrian connection on Merrydale Road. Developments like these are essential for the long-term success of the SMART system.

As you are aware, in September 2023 the Metropolitan Transportation Commission (MTC) issued final Draft Guidance on the Transit Oriented Communities (TOC) policy<sup>1</sup>. This policy requires that developments within a half-mile of a high-capacity transit station meet certain density and parking standards to be eligible for future funding.

In the case of the SMART Marin Civic Center Station Area, the TOC average minimum density standard for residential developments is 25 dwelling units per net acre and for commercial office space is 1 FAR. Additionally, the TOC policy contains parking requirements of at least 1 bike parking space per dwelling unit, a maximum of 1.5 vehicle parking spaces per dwelling unit, and a maximum of 4 vehicle parking spaces per 1,000 square feet of retail space. While this project appears to meet the minimum threshold for residential density and does not contain commercial offices, the number of planned parking spaces for both the residential and commercial portions of the project are beyond the TOC maximums, and the number of bicycle parking spaces are below the TOC minimums.

To ensure eligibility for OBAG 4 funding and any other discretionary funding that may be linked to TOC Policy compliance, the City will be required to demonstrate compliance to MTC prior to adoption of OBAG 4, expected in 2026. Compliance will also be required for transit agencies, including SMART, Golden Gate

<sup>1</sup> <https://mtc.ca.gov/planning/land-use/transit-oriented-communities-toc-policy>

Transit, and Marin Transit, to apply for transportation improvements in the City of San Rafael. We recommend that the City review the parking requirements of this development and adopt station-area standards in compliance with this program in order to enable future project funding.

Thank you for the opportunity to review and we look forward to supporting this project as it moves forward in the process.

Sincerely,

A handwritten signature in dark ink, reading "Emily Betts". The signature is written in a cursive style with a large, looped initial "E".

Emily Betts  
Principal Planner