

November 19, 2018



Protecting Marin Since 1934

Raymond Santiago
Principle Planner
Golden Gate Transit District
1011 Andersen Drive
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RE: Scoping comments for the San Rafael Transit Center (SRTC) Replacement Project Draft EIR

Dear Mr. Santiago:

Marin Conservation League (MCL) has followed and influenced land use decision-making and conservation planning throughout Marin since its founding in 1934. MCL's mission is to preserve, protect, and enhance the County's natural assets.

MCL has tracked the visioning and planning efforts for the relocation of San Rafael's downtown Transit Center since the release of the SRTC Relocation Study and has participated on vision panels led by the Federation of San Rafael Neighborhoods. We submit the following scoping comments for the preparation of the draft environmental impact report.

Since the Notice of Preparation did not identify a "proposed project" for one of the site alternatives, we request that the EIR analyze impacts from each alternative with an equal level of detail. We also request that the EIR analyze impacts both for the period of construction and for the life of the project. For all alternatives, the description, impacts, and mitigations should assume future operation of SMART service to Larkspur Landing, including daily service through San Rafael that would cross several streets. Since the service is projected to be operative before completion of a new transit center, the cumulative impacts, both on-site and off-site but in the area of both projects, should be included in the environmental analysis.

Transportation/Traffic

Analysis of transportation impacts should include use of all recent traffic studies in the project area including, but not limited to, recent studies by San Rafael's Department of Public Works, the recent Kimley Horn study of the 3rd and Hetherton intersection, the Third Street Rehabilitation Project, and should include available congestion management analysis and traffic data from Marin County's Transportation Authority of Marin. The EIR should describe and analyze impacts from the following:

- Vehicle access and exit routes from all directions, including from Hwy 101, and including merges that would be added.
- Relocation, elimination, or change of any traffic lanes in the project area.

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- Relocation, removals, and additions of pedestrian crosswalks.
- Vehicle backups onto adjacent streets. Identify streets and neighborhoods that would experience increased traffic backups, at what times, along with proposed mitigations.
- Vehicle traffic along the 2nd and 3rd street arteries.
- Impacts to local roads and highways during emergencies and evacuations, such as during wildfire or flood.
- Sight distances for drivers, particularly for buses as they drive to, enter, and park in the new bays, and provisions for passenger access and boarding.
- Location of parking for downtown shoppers as well as for transit users. What parking would be removed and what parking spaces would be added?
- Impacts to downtown businesses, particularly in the east part of 4th Street where there has already been roadway modification to accommodate the train that slows traffic.

Also:

- For each alternative, describe what properties would have to be acquired and how affected businesses would be relocated.
- Describe how Highway 101 through-traffic will be affected by changes in transit center relocation.
- Describe how alternatives will support City goals of reduced congestion and improved safety for pedestrians and bicyclists in the area.
- The North-South Greenway multiuse path has been in Marin County bike plans for several decades. Completion of the segment through San Rafael, from 2nd Street north to Mission Street along Tamalpais Avenue, is an important link in the pathway corridor and is a priority project in San Rafael's recently updated Bicycle Pedestrian Master Plan. Describe the compatibility and impacts of alternatives with this planned route.
- A priority for San Rafael residents is that students are able to walk and bike safely and comfortably through downtown to Davidson Middle School and San Rafael High School from residential neighborhoods on the opposite sides of the freeway. Describe how alternatives will positively or negatively impact safe, comfortable east-west circulation under the highway for students and other users to access schools, shops and services.

Air quality

The EIR should describe and analyze impacts to air quality (including odors); cumulative and net increases in air pollutants, including emissions from buses entering and exiting the bays and from vehicles dropping off or picking up passengers; and any increased emissions due to associated increased traffic idling from possible added congestion.

Greenhouse gas emissions

Recent reports have stated transit ridership, especially traditional bus service, is declining both locally and nationally. SRTC design alternatives should describe how they will accommodate newer transit technologies, such as minibuses and ride-sharing vehicles, near the bus bays to drop off and pick up commuters during transit interchange without incurring negative impacts to local traffic. How the SRTC will support transition to electric busses and accommodate other

developing technologies, such as autonomous vehicles, should also be described.

Describe how alternatives will increase ridership, providing efficient, safe and comfortable experiences for public transportation users. Increased ridership will help San Rafael, and other jurisdictions, meet greenhouse gas reduction goals in their climate action plans. The EIR should assess net impacts to greenhouse gas emissions from current ridership levels and realistic projected increases in ridership.

Noise and Light

Assess the extent to which alternatives would contribute to noise and light pollution in the area and how these impacts can be mitigated.

Hydrology and water quality

The EIR should show existing creeks on the site maps, and state impacts or changes resulting from sea level rise scenarios as outlined in the County of Marin's Bay Waterfront Adaptation and Vulnerability Evaluation (BayWAVE). The report catalogs effects of three different water elevation projections for near, mid, and far term periods, with and without a 100-year storm. The transit center relocation should consider at minimum the projections for near and mid-term time periods, estimated to be about 10 and 30 years or less from center construction. Presumably, the relocated center would have a life span that would encompass these time periods.

The EIR should identify which alternatives, if any, will meet the goals of "climate-safe infrastructure" as set forth in the California Natural Resource Agency's recent report "Paying it Forward: The Path Toward Climate-Safe Infrastructure in California" and describe adaptation strategies to flooding.

The EIR should describe maximum anticipated rates and volumes of stormwater runoff, drainage capacity of stormwater management systems and any needed expansion, filtration into the San Rafael Creek watershed and possible erosion during construction and operation. Include proposed mitigations, especially for alternatives that would alter existing creeks or flows. MCL would like to see watershed restoration happen in conjunction with transportation improvements.

Assess toxicity of soils on the project site and describe how sediment and any contaminants will be prevented from entering the creeks and the nearby estuary. Describe how stormwater will be filtered to meet the California State Water Quality Control Board's regulations for Phase II small municipal separate storm sewer systems (M4S). Describe how restoration of creeks, trees and riparian vegetation, and installing green infrastructure and permeable pavement as elements of the alternatives would help mitigate flooding.

Biological resources

Describe biological resources within the project area. Analyze impacts to nearby riparian or wetland habitats and their biological resources, both resident and migratory, including invertebrates, aquatic species and vegetation. Describe current urban wildlife habitat value and

how it will be protected.

San Rafael is a “Tree City”. Trees contribute to stormwater reduction, improve air quality and contribute to carbon sequestration and greenhouse gas reduction, lower ambient air temperatures and counteract urban heat island effects, buffer noise, wind, and odors. They provide beneficial visual impacts and provide needed habitat for urban and migrating birds, wildlife and insects (including pollinators). The EIR should identify whether trees will be planted as part of the project and their impacts as they grow and their canopies spread over time.

Aesthetics

Describe the viewshed of the surrounding hills. Provide simulations of how views from a variety of angles will be impacted.

Goals that emerged from the Federation of San Rafael Neighborhoods’ panel discussions as a vision for the relocated transit center included: efficient flow of traffic from the 101 highway and on city streets; safe pathways for pedestrians and cyclists travelling all directions; an appealing, aesthetic, and welcoming townscape; and respect for San Rafael’s natural, cultural and architectural history and resources. MCL hopes the Bridge District’s Transit Center Replacement Project will achieve these goals.

Thank you for the opportunity to comment on the scope of the upcoming draft environmental impact report.

Sincerely,



Linda J. Novy
President