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Protecting Marin Since 1934

Raymond Santiago, Principal Planner  
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Via email: [SRTC@goldengate.org](mailto:SRTC@goldengate.org)

RE: Comments on the Draft Environmental Impact Report (DEIR) for the San Rafael Transit Center (SRTC) Replacement Project

Dear Mr. Santiago:

Marin Conservation League (MCL) has tracked the visioning and planning processes for the SRTC Replacement Project (Project) since the Transit Center Relocation Study began in 2016. MCL provided scoping comments for the Project's environmental review in 2018 and appreciates this opportunity to provide comment on the DEIR document.

General comments – Consistency with San Rafael's General Plan 2040

The DEIR analysis refers to San Rafael's General Plan 2020 (GP2020) and to its General Plan 2040 (GP2040) in an inconsistent manner. While GP2020 was in effect on the date of Notice of Preparation (NOP), the GP2040 update process was already underway when the NOP was released. The planning process involved significant stakeholder and community input. Draft elements and associated reports and studies were posted on the City's website over the course of two years as they became available. San Rafael adopted both the GP2040 and a Downtown Precise Plan (DPP) on Aug 2, 2021, prior to release of the DEIR and as such they should be considered as relevant existing conditions for the project.

DEIR analysis should consistently refer to the goals, policies, and programs of GP2040 and DPP. The project will be constructed and operational while the GP2040 is in effect. It will influence *the future* of San Rafael and its development, not the twenty years GP2020 was in effect.

Greenhouse Gas (GHG) Emissions – Monitoring reduction goals for transportation

The DEIR reports on impacts due to GHG emissions from both Project construction and operations. The GHG section summarizes federal, state, and local policies and plans, including San Rafael's Climate Change Action Plan 2030 (CCAP), that target GHG emission reductions from transportation. Integration of transportation with land use and environmental planning is especially important for reducing GHG emissions. This will require further collaboration between GGBHTD

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Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

and the City of San Rafael because inconsistency between planning efforts would undermine the effectiveness of achieving the reduction goals.

Both San Rafael's GP2040 and DPP plan for significant growth near the Project. The DEIR Transportation Summary Report shows worsening levels of service and traffic delays at many intersections by 2040 which logically will impact GHG emissions and air quality. But the DEIR states that the proposed project includes measures that are consistent with state regulations that will reduce GHG emissions. Therefore, the impact is determined to be less than significant. No mitigation is required.

Transit can be a means of reducing GHGs if it serves to support productive development patterns that offset growth impacts. Regardless of whether it is required as mitigation or not, monitoring the Project's impacts on GHG emissions by focusing on increasing transit ridership would be worthwhile.

#### Hydrology – Planning for sea level rise (SLR) adaptation

All future development, especially the placement of critical transportation infrastructure, should include planning for a future of climate change and sea level rise. The DEIR of alternatives does not consider the impacts of locating SRTC in an area at increased risk for SLR and flooding nor what mitigations would be needed to best prepare the replacement project for continued operation during SLR and during increased intense storms.

The DEIR's associated *Appendix H: Preliminary Geotechnical Design Recommendations* produced by PARIKH did not account for anticipated sea level rise, associated rising groundwater and more frequent flooding as future subsurface conditions. According to the PARIKH report all alternative locations considered in DEIR would be built on fill overlaying mostly bay mud. These conditions are often associated with subsidence.

The City of San Rafael is in the midst of planning for sea level rise. Its Climate Change Action Plan 2030, Program SA-C4: Sea Level Rise, states, "Prepare and adapt to a rising sea level."

MCL's 2016 scoping comments included "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)." DEIR should include analysis of future sea level rise scenarios for the life of the project and include associated elevated groundwater levels and how alternatives will impact future solutions for adaptation to SLR flooding.

The DEIR should assess the environmental impacts of building in proximity to the tidally influenced Erwin and San Rafael Creeks and as well as the rising Bay.

Hydrology – Incorporate green streets infrastructure

The DEIR should reference how build-out of each SRTC alternative would integrate the GP2040 Conservation and Climate Change policies and programs that it lists including creek protection, enhancement of drainages and creeks, reducing pollution to stormwater runoff, low impact development, green streets, erosion control, stormwater drainage improvements.

In particular, green streets infrastructure (GSI) should be integrated to help reduce anticipated exposure to flooding and to prevent stormwater pollution. GSI reduces heat island effects of paved surfaces, improves air quality and community “livability” in the public realm. Aligning a stormwater retrofit with mobility and active transportation could open up additional funding and resources.

Addressing drainage of the site with a sustainable stormwater system would address San Francisco Bay Regional Water Quality Control Board’s Municipal Regional Stormwater Pollution Prevention Phase II Permit requirements and align with GP2040 Policy CSI-4.4: Sustainable Design.

Biological Resources – Mature trees

The DEIR does not inventory existing mature trees for preservation, as described in GP2040 Policy C-1.17: Tree Management, which states “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.” Mature trees play an important role as urban canopy for shade and protection against heat island effects. They support air quality and sequester carbon.

Infiltration rate and slope analysis should anticipate mature trees along with GSI in future geotechnical design considerations for drainage. DEIR should delineate specific trees that will be removed under each Alternative and where mature tree protection is not possible, onsite mitigation should be described.

Thank you for considering these comments.

Sincerely,



Robert Miller  
President



Kate Powers  
Land Use, Transportation, and Water Committee