

April 19th, 2021



San Rafael City Council
1400 Fifth Avenue
San Rafael, CA 94901

RE: San Rafael Transit Center (SRTC) relocation alternatives

Dear Mayor and Councilmembers:

Marin Conservation League (MCL) has tracked the visioning and planning efforts for the relocation of the SRTC since the Transit Center Relocation Study began in 2016 and provided scoping comments for the SRTC Replacement Project draft environmental impact review in 2018. We hope you will consider our comments as the study of site alternatives for the SRTC relocation nears completion and a preferred alternative is chosen.

While the draft Downtown San Rafael Precise Plan identifies the area bounded within the SRTC relocation footprints as a node or gateway, the area has historically functioned as an area of passage and flow, both for water and transportation. Those functions need to continue to be prioritized, as well, in the final plan. We request your attention to the following potential impacts from each of the alternatives as the draft EIR nears completion.

Transportation and Traffic

Impacts must be considered for both the construction of the project but also for the life of the project. This is true for all categories of potential impacts, but it is particularly true for transportation and traffic impacts. How will the City's goals for reduced congestion and increased safety for pedestrians and bicyclists be tackled? Traffic studies and recent traffic issues must be well documented and project impacts for each of the alternatives addressed and mitigated, including:

- Vehicle access and exit routes in each of the alternative site locations, including merges that may be added
- Relocation, elimination, or change of traffic lanes in the project area
- Relocation, removal or additions of pedestrian crosswalks and the priority for increased safety at intersections

Note: The **4th Street Gateway** concept includes a southbound double right turn lane from Hetherton onto 3rd Street. Recent changes were made to the 3rd and Hetherton intersection at the southeast corner to remove a double turn lane after it was determined that it was the cause of several collisions.

- Possible vehicle backups on adjacent streets or in adjacent neighborhoods
- Impacts to vehicle traffic along Second and Third Street arterials
- Possible impacts to through-traffic on Highway 101
- Possible impacts to local roads and highways during emergencies and evacuations

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

- Sight distances for drivers, including bus drivers as they enter and park in bays
- Provisions for safe passenger access and boarding
- Location of parking for both transit users and also for those accessing local businesses
- Compatibility with completing North-South Greenway through downtown from Second Street to Mission Avenue

Note: The **Whistlestop Block** concept is the only concept that facilitates the completion of this segment of the North-South Greenway. The variation of the **Whistlestop Block** concept that relocates the Whistlestop building creates the best alignment for the Greenway.

- Safe and comfortable east-west circulation under the highway and across intersections for students as well as other users of transit, both bus and rail, and bicyclists and pedestrians.

Light, Noise, Aesthetics

Project impacts related to light, noise, sightlines and viewsheds must be well considered, both for transit users as well as others who will be moving through the area or will reside or work adjacent to a proposed SRTC relocation site. Viewsheds of the surrounding hills should be included for each alternative.

Air Quality and Greenhouse Gas (GHG) Emissions

Emissions from buses entering and exiting bus bays and from vehicles dropping off or picking up passengers as well as emissions associated with any increase in idling cars and increased congestion should be evaluated. Alternatively, how might opportunities and benefits of each alternative possibly lead to providing an improved efficient, safe and comfortable transit experience, an increase in ridership and a subsequent reduction of overall GHG emissions? Net impacts to GHG emissions related to ridership should be considered.

Note: According to GGBHTD survey results, of the 873 English-language survey respondents, only 14% (122) respondents identified as transit users. Of the 132 Spanish-language survey respondents, 89% (117) identified as transit users. According to the survey results, non-transit riders preferred the **Under the Freeway** concept while transit riders most strongly supported the **Whistlestop Block** alternative.

Hydrology, Water Quality, and Biological Resources

Each alternative should be evaluated in relation to San Rafael's adaptation strategies to sea level rise and future flooding scenarios (as well as resilience to other hazardous shocks like wildfires and chronic stresses like drought). Evaluating maximum anticipated rates and volumes of stormwater runoff, drainage capacity of stormwater systems, filtration into the San Rafael Creek Watershed including Erwin Creek, potential erosion, and the alteration of creek flows.

The draft Downtown San Rafael Precise Plan recommends prioritizing natural systems and possibly restoring areas of urban wetlands for stormwater catchment and release to offset impacts of near- and long-term flooding. Stormwater, its potential reuse, and contribution to public realm should be studied, and the potential for employing green infrastructure under each alternative explored including the use of permeable pavement and vegetated bioswales.

Note: The accumulation of gravel in Erwin Creek is currently removed and the creek maintained through the use of equipment. Covering the creek as in the **Under the Freeway** concept would create issues for that maintenance. The creek is regularly used by egrets in that area.

Current biological resources in the project area should be identified and methods for resident and migrating species along with habitat protection should be evaluated for each alternative. Trees contribute many ecosystem services including stormwater reduction, improve air quality, contribute to carbon sequestration, lower ambient air temperatures and counteract urban heat island effects, buffer noise, wind and odors. They contribute to beneficial visual impacts and provide habitat. The space available for trees should be evaluated for each alternative.

Thank you for your attention to these important issues as you evaluate the alternative site relocations.

Sincerely,



Robert Miller
President



Susan Stompe
Chair of Land Use, Transportation, and Water

Cc: Denis Mulligan, General Manager, GGBHTD
Raymond Santiago, Project Manager, GGBHTD
Jim Schutz, City Manager, City of San Rafael
Paul Jensen, Community Development Director, City of San Rafael
Bill Guerin, Department of Public Works Director, City of San Rafael