

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

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**Mar 09 2021****STATE CLEARINGHOUSE**

March 9, 2021

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Co/Rt/Pm: MRN/101/VAR

Barry Miller, Project Manager  
City of San Rafael  
1400 Fifth Avenue  
San Rafael, CA 94901

**Re: City of San Rafael General Plan 2040 and Downtown Precise Plan – Draft  
Environmental Impact Report (DEIR)**

Dear Barry Miller:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the January 2021 DEIR.

**Project Understanding**

The city of San Rafael has prepared a Draft General Plan 2040 to guide land use and development, and a Draft Downtown Precise Plan has been prepared to revitalize and enhance the Downtown Area. Development under the proposed General Plan 2040 would consist of up to 2,260 new residential units, 5,340 residents, and 2,095 employees. Development under the proposed Downtown Precise Plan would consist of up to 2,200 new residential units, 3,570 residents, and 2,020 employees. The city of San Rafael is bisected by US-101 in the north-south direction and Interstate (I)-580 in the east-west direction.

**Travel Impact Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans uses Vehicle Miles Traveled (VMT) to assess Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide.

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Based on the DEIR, the implementation of the proposed project would result in a significant land use VMT impact for total VMT and work VMT due to forecast land use growth through 2040. Caltrans commends Mitigation Measures TRAN-1a and TRAN-1b to reduce VMT. However, the effectiveness of VMT reductions strategies is not certain and the programmatic nature of the project may limit the availability of additional mitigation measures. Therefore, the VMT impact remains significant and unavoidable even with the implementation of mitigation measures TRAN-1a and TRAN-1b.

It is worth mentioning that the DEIR also proposes Alternative B: Greater Residential Growth, which would yield more residential units, but the total VMT Per Service Population and work VMT Per Employee under Alternative B would be less than the proposed project. Caltrans encourages the Lead Agency to provide more information regarding how the proposed project is preferred over Alternative B.

### **Lead Agency**

As the Lead Agency, the City of San Rafael is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Yunsheng Luo at [Yunsheng.Luo@dot.ca.gov](mailto:Yunsheng.Luo@dot.ca.gov). Additionally, for future notifications and requests for review of new projects, please contact [LDIGR-D4@dot.ca.gov](mailto:LDIGR-D4@dot.ca.gov).

Sincerely,



MARK LEONG  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse