September 2nd, 2020

<u>Via email only</u>

Paul Jensen, Community Development Director
Barry Miller, General Plan 2040 Project Manager
1400 Fifth Avenue
San Rafael, CA 94901

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barry.miller@cityofsanrafael.org

RE: Comments on Draft General Plan 2040

Dear Mr. Jensen and Mr. Miller:

As a Marin Conservation League board member, I have appreciated the opportunity to
participate as an environmental stakeholder on the General Plan (GP or the Plan) 2040
Steering Committee. I have also appreciated the quality and depth of the plan update,
your leadership of the planning process, and the many stakeholders who have contributed
to the process to date.

My comments on the Draft plan have been added to by other MCL board members. They
begin with three general comments then become more specific to goals, policies and
programs and largely follow the order in which they appear in the plan.

<u>In general</u>
The plan includes many policies and programs that clearly state a directive. It also
includes many that do not. I respectfully request that policies and programs in the GP <u>not</u>
be passively stated, but rather with direction that intends clear outcomes. Words like
"consider", "recognize" and "explore" are too weak and have no clear planning intent. As
a visionary document, the GP needs verbs that will move the city forward and will more
clearly direct action that will manage both change as well as preservation. (See specific
suggestions in addendum.)

Please include a glossary in the plan that defines terminology and provide hyperlinks throughout the Plan to specific references and to the other San Rafael plans and documents referenced. A glossary will make the GP more transparent and accessible to the general public. (See suggested glossary list in letter addendum.)

The public should have an opportunity to review updated maps before Final GP 2040 is adopted. With San Rafael's GIS technology and expanded sources of available data, the following improvements to GP 2020 maps are requested:

- Watersheds and Creeks map should include not only all perennial and intermittent creeks but also ephemeral creeks and drainage networks.
- On Major Biotic Landscapes map, urbanized areas should be left white (no pattern) and predominant plant communities in biotic areas should be differentiated.
- In addition to the map of Endangered, Rare or Threatened Species, provide a map with areas dominated by invasive species also.
- Finally, Sea Level Rise Projection map should delineate areas that will be impacted by rising groundwater due to sea level rise.

More specific

Environmental planning is often framed in terms of mitigating against impacts. San Rafael's GP should lay the groundwork for integrating environmental, land use, and transportation goals. Environmental protection should be integrated early in the planning of development and transportation projects. This may require identifying goals and policies that conflict and improving their coordination. In *Land Use Goal LU-1*: ***Well-Managed Growth***, add "Protecting environmental quality will be an objective in land use planning." In *Mobility Element Goal M-1*: ***Regional Leadership in Mobility***, add "Protecting environmental quality will be an objective in planning transportation projects." Change *Goal M-3*: ***Cleaner Transportation***, to "Protect environmental quality by coordinating transportation and land use decisions in ways that reduce greenhouse gas emissions, air pollutants, noise, pollution from stormwater runoff and other environmental impacts related to transportation."

Wherever possible, back policy priorities with funding. For example, in *Land Use Policy LU-1.1*: ***Balancing Growth with Infrastructure***, replace "Plan local circulation and infrastructure systems to provide capacity for development" with "Plan and fund local circulation and infrastructure systems to provide capacity for development". In addition, replace "The City's plans should" with "The City's plans and capital improvement budgets should prioritize". In *Policy LU-1.2: Development Timing*, "Allow new development only when adequate infrastructure is available," add "or a projected need for infrastructure and services is linked with the ability to pay for them".

Wherever the plan refers to infrastructure, such as "Sewer, water, and other infrastructure improvements" (*Policy LU-1.2c*) include "stormwater" with "sewer" and "water". GP policies and programs should manage stormwater as a resource and move the city forward in

obtaining its National Pollutant Discharge Elimination System (NPDES) permit coverage for stormwater discharge. In *Conservation and Climate Change Policy C-3.4*: ***Green Streets*** as well as *Community Services and Infrastructure Policy CSI-4.10*: ***Storm Drainage Facilities*** add "Whenever infrastructure improvements are planned on streets and roads, evaluate improvements needed for stormwater infrastructure, treat stormwater as a resource, and determine where watershed restoration improvements can be made simultaneous to infrastructure improvements."

In *Land Use Policy LU-1.3*: ***Land Use and Climate Change***, replace "Focus future housing and office development . . . around transit stations" to "Focus future housing and office development . . . around stations with high frequency and high capacity transit". High density should be designed in areas with transit capable of moving high numbers of riders to job centers or other common destinations. Increasing density around stations alone is ineffective as an environmental policy unless it impacts travel behavior away from auto ownership and use. A lack of effective and established high quality transit options would cause congestion in high density development areas and lead to greater greenhouse gas emissions and air pollution. Transit-oriented development (TOD) as a land use and transportation strategy lacks efficacy if it is not context-sensitive.

Under *Land Use Program LU-1.7A*: ***Development Adjacent to San Rafael***, assign Community Development as the City's department charged with working with "the County and other jurisdictions to review applications from areas of interest adjacent to City limits or within the Sphere of Influence." Particular focus should be paid to the San Rafael Rock Quarry, and the County's responsibility in overseeing compliance with permits and reclamation plans. The Quarry's request to extend its operating permit sets a new expiration date slightly beyond San Rafael's 2040 planning horizon. However, policies and programs for reuse at the Quarry site, once it ceases operation, will be governed, in part, by possible future San Rafael annexation. If the Quarry's pace of operations picks up, it may reach its maximum mining depth prior to 2044. It's in San Rafael's interest that quarry reclamation activities, including marsh restoration, not be delayed and are backed by long-term financial assurances. Since completion of the 2009 Final EIR, conditions and legal requirements have changed. Science and technology of mining and mitigating environmental impacts along with measures for protecting the health and safety of San Rafael's neighboring communities have advanced. Traffic on 2nd and 3rd Streets has substantially increased and will be further impacted by the relocation of San Rafael's Transit Center and other downtown development. Sea level rise planning and potential impacts to neighboring coastline adaptations must be

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considered in planning future development of the site. The feasibility of breaching the side of the quarry and filling it with recirculating bay water needs additional study.

Land Use ==Policy LU-1.8==: ***Density of Residential Development*** and ==*Policy LU-1.10*==: ***Intensity of Non-Residential*** *Development* raise several questions:

b) How will "the adequacy of infrastructure" be determined? Will there be objective standards for water, sewer, and stormwater? Will Level of Service (LOS) or Vehicle Miles Traveled (VMT) determine adequacy of road, pathway and transit options?
c) How does the GP anticipate state-mandated development bonuses and incorporate strategies to retain some level of local planning control? Will Objective Design and Development Standards be a tool?
d) Are there limits to the number of accessory and/or junior accessory dwelling units on one site or allowable percent of parcel coverage by development? Are there off-street parking requirements especially in transit-rich areas?

Land Use ==*Policy LU-1.18*==: ***Height Bonuses*** states, "The bonuses are intended ***to be used in tandem with (and not in lieu of)*** those offered through state and local affordable housing density bonus program." It seems the City would want to limit height bonuses in General Plan 2040 and use other incentives or planning tools where additive city and state height bonuses would not allow an area to keep within character of existing structures or align with designated land uses since the State is creating its own mandated bonuses. Include language protecting views, privacy, and solar access of existing buildings and uses both here and in ==*Policy LU-3.2:*== ***New Development in Residential Neighborhoods***.

In *Land Use* ==*Policy LU-1.9*==: ***Clustering*** add "Encourage wildlife corridors and habitat preservation in areas where adjacent properties share environmentally sensitive areas." after end of paragraph.

As a result of *Land Use* ==*Policy LU-2.6*==: ***Lot Consolidation***, retaining unique individual buildings on small lots should not be disincentivized. San Rafael would benefit from a mix with opportunities for local builders and small developers to rehabilitate and redevelop buildings that add character to downtown and to neighborhoods. See *Community Development and Preservation* ==*Policy CDP-5.5*==: ***Adaptive Reuse***.

In *Land Use* ==*Program LU-1.8A*==: ***Codifying Residential Density*** *Limits* and as new bullet in ==*Policy LU-3.2*==: ***New Development in Residential Neighborhoods***, add "Limit impacts to views, privacy and solar access of neighboring properties."

In *Community Development and Preservation Program CDP-1.5A: Evaluating View Impact,* replace "Consider the impact of proposed development on views" with "Require proposed development four stories or more to show how scenic views, sightlines, and visual character may be impacted or preserved".

Replace *Program CDP1.5B: Guidance on View Protection* with "Establish clearer guidance in City guidelines and standards protecting views, privacy and solar access for existing buildings from new development, additions, and alterations."

Under *Policy CDP1.5: Views*, create an additional *Program: (Solar access or) Shadow ordinance* "Develop new shadow ordinance that specifically limits impacts from new development or from modification to existing structures or properties that might negatively impact neighboring properties."

In *Mobility Program M-7.4E: Design Standards for Parking Garages,* add "Limit intrusions into view corridors and require shadow impact analysis to limit shading of neighboring properties including shopping streets, open space, parks."

In *Conservation and Climate Change Policy C-1.6C: Creek Protection*, add "Treat sediment from stream flow and deposition as a resource." after "permitted."

Change the last sentence in *Program C-1.6C: Creek and Drainageway Mapping* to "Evaluate the potential for restoration of natural hydrologic function of creeks and drainageways wherever possible."

In *Policy C-1.9: Enhancement of Creeks and Drainageways* insert "and hydrologic function" after "habitat value" in beginning of sentence, "Conserve or improve the habitat value of creeks". Add "Treat sediment from stream flow and deposition as a resource." after "feasible."

Add an additional *Policy* and *Programs*, following *Conservation and Climate Change Program C-1.9A Watercourse Protection Regulations:*

Policy C-1.9___: Reduce marine pollution from plastics
Reduce and remove plastics in stormwater runoff from entering creeks, marshes and the Bay to reduce marine pollution from plastics. See *Program C-3.6A: Water Quality Improvements.*

Program C-1.9 ___: Creek and coastal cleanups. Coordinate volunteers for, sponsor, or participate in a series of repeated creek and coastal cleanups in the Fall prior to the rainy season. (Once is not enough.) Support neighborhood adoption of stormwater drains for regular cleaning similar to Mill Valley's Adopt-a-Spot program.

Program C1.9_: Street sweeping. Plan and mobilize street sweeping prior to predicted major   storm events.

Program C1.9_: Enforcement of City bans. Enforce City plastic bag and polystyrene foam bans and support the City's plastic utensils "Ask First" campaign.

Include under **Program C-1.10A: Hillside Management and Design Guidelines**, Hillside Management and Design Guidelines should implement actions described in San Rafael's "Wildfire Prevention and Protection Action Framework".

Change **Program C-1.14: Integrated Pest Management Policy** to a *Policy* and adopt as a *Program* an IPM ordinance to implement the *Policy*:

Policy C-1.__: Integrated Pest Management Policy
Maintain and update Integrated Pest Management Policy (IPMP) to minimize pesticide application in the city and encourage nontoxic methods to control vegetation. The IPMP should be updated to reflect changes in regional stormwater control requirements, data on pesticide toxicity, feasibility of new and less toxic methods for controlling invasive plants and build on Marin County's IPM policy and ordinance successes.

Program C-1.__: IPM Ordinance Adopt an IPM ordinance to implement SR IPM policy. Changes to San Rafael's IPM policy and ordinance should be made through a transparent public process and should ensure that the use of any chemicals of concern is publicly noticed.

In **Goal C-3: Clean Water**, add "The City will continue to participate with North Bay Watershed Association and the One Water approach."

Insert "Pollution Protection" between "Stormwater" and "Program" in **Program C-3.2A: County Stormwater Program**. Add "Meet State Water Quality Control Board requirements for stormwater permits by prioritizing Trash Reduction Implementation Plan measures."

Policy C-3.5: Groundwater Protection should include a statement about planning for rising groundwater due to sea level rise and protecting shoreline properties. In *Safety* **Goal S-3: Resilience to Flooding and Sea Level Rise** and in all *Safety Element S-3 Policies* and *Programs* where relevant, add ", rising groundwater," after "flooding" and before "and sea level rise".

In *Conservation and Climate Change* **Policy C3.9: Water-Efficient Landscaping**, insert "Bay Area native species" between "Encourage the use of" and "vegetation and water-efficient landscaping that is naturalized".

Add **Program C-4.4B: Low Carbon Concrete Code Standards**. Follow Marin County's lead in adopting standards that establish cement and embodied carbon limit allowances in concrete.

In *Climate Change Crosswalk* text box, under *Land Use Element*, add "creating walkable neighborhoods close to retail and services."

Insert "while protecting natural resources" between "Encourage linear parks and trails" and "along the Bay shoreline" in *Parks, Recreation and Open Space Policy PROS-1.8: Linear Parks and Trails*. In *Policy PROS-3.1: Open Space Framework* replace "Framework" with "Network" as referred to in *Policy PROS 1.9: Role of Open Space*. What actually exists is a "network" of open spaces without obvious cohesion. The opportunity to establish a "framework" for both maintaining existing and identifying future open spaces comes under *Policy PROS-3.3: Open Space Management* and *Program PROS-3.3A: Open Space Management Plan*. The Plan should be the focal point of the entire *Goal PROS 3: Protected, Well-Managed Open Space* section, for it is the missing link. Everything that precedes should become part of the Management Plan. The last sentence of paragraph under *Program PROS-3.3A* should read "It should include six areas of focus:" and a sixth bullet should be added to include public education (as described in *Policy PROS-3.10: Public Education* and *Programs PROS-3.10A: Public education* and *10B: Interpretive Facilities*). Education and interpretation should receive formal recognition as an essential area of focus in the Management Plan. It is important to pin down private open space to conditions and monitoring. In *Policy PROS-3.5: Private Open Space* replace "Encourage the long-term stewardship" with "Ensure the long-term stewardship". *Program PROS-3.5A: Appropriate Use of Private Open Space* should be tied to conditions placed on the development of the property. Replace "identify use limitations such as" with "specify use limitations in a maintenance agreement as a condition, including restrictions on" and add "subject to enforcement" at the end.

In *Mobility Policy M-2.2: Safety*, replace "convenient for all modes of travel" with "that serves people using all modes of travel". It's important to plan for people and from the perspective of usage when planning for transportation, not just from the perspective of systems and modes.

In *Program M-2.5B: Level of Service (LOS) Exceptions (d),* insert "objective" between "substantial" and "evidence" in first sentence and determine how objective criteria will work in determining LOS exceptions.

In *Policy M-2.11: Sea Level Rise,* replace "Consider" with "Actively plan for". After "transportation system" in the first sentence, add "and its components". Add these additional sentences. "All future transportation infrastructure improvements should be based on latest (at the time plans are made) sea level rise projections for the year 2040 and beyond. All infrastructure improvements should support or be able to adjust to future sea level adaptation efforts in a cost-effective manner."

In *Program M-3.2A: Screening Criteria for VMT Analysis,* strike last sentence, "The criteria should include exemptions for projects . . ." State VMT legislation and CEQA will determine criteria for exemptions.

Under *Policy M-3.8: Land Use and VMT*, create a *Program M-3.8A.* Work closely with Transportation Authority of Marin (TAM) to analyze and predict probable job destinations for those living in planned walkable communities – where will they commute to and what will be the most time-efficient and cost-effective way for them to get there? Use this analysis to plan for appropriate housing density/ intensity and supporting transportation infrastructure for new development and redevelopment sites within the City. Housing in walkable neighborhoods needs to be near high frequency transit that goes directly to job centers in order to meet VMT and Plan Bay Area GHG reduction goals. Plan from a user perspective.

Under *Policy M-5.4: Meeting Local Circulation Needs around Highway Interchanges*, add *Program M-5.4B: Highway crossings*. Work with Caltrans and TAM to provide safe and separated highway underpass or overpass pathway crossings where needed, and whenever possible, to improve community access across highways and safety for pedestrians and bicyclists. See *Program M-6.3A: Implementation of Pathway Improvements*.

In *Program M-6.2D: Safe Routes Programs,* after last sentence, include "Explore identifying Safe Routes for Seniors."

From a bicycle and pedestrian safety perspective, under *Program M-6.3A: Implementation of Pathway Improvements,* replace in bullet #3, "multiuse path" with "separated bicycle and pedestrian facilities". Replace in bullet #5, "Additional Class I and II lanes," with "Additional Class I, II and IV lanes,".
And, include these bullets:
- A northern bikeway through North San Rafael connecting Terra Linda with Marinwood and Lucas Valley
- East-west improvements along North San Pedro Road and Freitas Parkway

(Listed as major routes or highest priority projects in "Bicycle Pedestrian Master Plan". North San Rafael projects tend to receive less attention but are important to include.)

In *Program M-7.4B: Assessment District Expansion*, add "Use revenue from parking district assessments for district maintenance such as street cleaning or desired district improvements." after "improvements in the expanded area."

In *Program M-7.7A*: ***Residential Permit Parking***, add "to limit amount of parking in residential neighborhoods, to reduce possible parking spillover from nearby commercial areas, or alternately, to allow paid commercial parking in neighborhoods if revenues pay for community benefits or improvements."

Under *Policy M-7.9*: ***Parking for Transit Users***, add *Program M-7.9B*: ***SMART Civic Center Station Parking***. "Plan for SMART Civic Center Station parking **east** of the station area."

In *Policy M-7.10*: ***Curbside Management***, add "Enable curb space allocation for allowed use to change as needed throughout the day." after "drop-off, cycling, and other activities."

In *Community Services and Infrastructure Goal CSI-4*: ***Reliable, Efficiently Managed Infrastructure***, insert "Environmentally-friendly" before "Infrastructure".

After *Policy CSI-4.3*: ***Public Involvement in Infrastructure Planning***, insert, "Establish an Infrastructure and Environmental Planning Advisory Committee (IEPAC)." before "Encourage public participation . . ." An IEPAC could be comprised of community members and stakeholders familiar with infrastructure needs and local utility service provider interests as well as those representing environmental protection, equity, and public health interests. IEPAC meetings would provide the public opportunity for discourse on the planning and design of City infrastructure projects. IEPAC would either inform design review or provide design review of City projects and complementary design review for major projects by other public agencies as outlined in *Program CSI-4.3A*: ***Design Review***.

In *Policy CSI-4.7*: ***Street Maintenance***, add "Safe, well-maintained neighborhood streets are an important component of the public realm and of San Rafael's local transportation network." after "programs."

In *Program CSI-4.7A*: ***Pavement Management***, link "Pavement Management Program" to the program (it's not easily found in a search). Prioritize major streets based both on pavement condition and traffic safety. Prioritize local streets based on both pavement condition and equity. Create a fair process for community input. Update newly repaved streets with designs that accommodate more users and meet highest standards for safety wherever and whenever possible.

Under *Program CSI-4.7C*: ***Sidewalk Repair***, City should monitor and analyze success of current cost-sharing program. City should regularly update sidewalk inventory, prioritization for repair, and funding sources and should include equity analysis in sidewalk repair prioritization. City should continue to track possible funding sources for sidewalk improvements and should consider other funding and cost-sharing approaches,

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such as City pays to maintain sidewalks as public ROW and property owner pays to maintain curbcuts such as driveway aprons.

In *Program CSI-4.7D: Street Lighting Program*, add "Install streetlight shields on LED streetlights per resident request." after "environmental objectives." And before "See also *Policy C-1.19* and *Program 1.19A* on night lighting and dark skies."

In *Policy CSI-4.10: Storm Drainage Facilities*, add "Treat sediment from stream flow and deposition as a resource. Evaluate the potential for restoration of natural hydrologic function of creeks and drainageways wherever possible." See *Policy C-1.9: Enhancement of Creeks and Drainageways* recommendations above. Add "Treat sediment from stream flow and deposition as a resource." to *Program CSI-4.10B: Silt Removal*.

In *Policy CSI-4.11: Canal Dredging*, add "Dispose of any contaminated dredge materials in an environmentally-sensitive way and prevent the spread of contaminated materials from entering the waters of San Francisco Bay."

Add "When considering options, weigh cost and reliability with possible impacts to public and environmental health." in *Policy CSI-4.16: Telecommunication Improvements*. There seem to be an increasing number of scientific studies mounting concerns about 5G.

In *Policy CSI-4.17: Reducing Landfilled Waste Disposal* and *Program CSI-4.17D: Waste Reduction Programs* add "Enforce City plastic bag and polystyrene foam bans and support the City's plastic utensils "Ask First" campaign." See suggested addition to *Policy C-1.9: Enhancement of Creeks and Drainageways* above regarding reducing marine pollution from plastics.

Insert "Public" after "Inclusive" in *Equity, Diversity, and Inclusion Goal EDI-1: Authentic and Inclusive Participation*. After "family status" add "to ensure community priorities and values guide future public decision-making." After "a more just and equitable city." add "San Rafael strives to achieve clarity and transparency in City planning processes and promotes opportunities for effective public participation."

Assign a City staff position the responsibility of empowering those traditionally marginalized or disenfranchised to effectively participate in local planning and public processes. Update San Rafael's 2015 "Community Engagement Action Plan" to implement *Equity, Diversity, and Inclusion Element Programs*.

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Please see Addendum for additional language (mostly active verb) suggested edits.

Thank you for the time and expertise with which you have guided this important document update and thank you for considering these comments. Marin Conservation League intends to participate in the public review of the draft Plans and the associated Environmental Impact Report as the public process continues.

Sincerely,

Kate Powers
MCL Board member
San Rafael General Plan 2040 Steering Committee member

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Comments on San Rafael's Draft 2040 General Plan Update
ADDENDUM
Kate Powers

As mentioned in letter, please define the plan's planning terminology in a glossary. For example, define:

- Development standards
- Development review process
- Community standards
- Performance standards and define how they are determined
- Land Use categories
- Uses – density/intensity standards
- Use permit requirements – link to where to find those
- Development rights
- Planned development zoning process – is it related to specific or precise plans and only to those plans?
- Planned development zoning districts
- Zoning ordinances vs applicable standards established by City's zoning regulations – are there public review opportunities as zoning changes?
- Significant public benefit and significant community benefit
- Floor Area Ratio limits (FAR)
- Short term rental standards vs short term rental regulations? Link to standards for eligibility, parking, # of guests
- Code enforcement program
- Define somewhere in document the design review process, vs planning review/ approval vs City Council approval
- Objective measurable design standards
- LAFCO
- Urban Service Area
- Entitlement process
- Parking District
- Downtown Parking Assessment District
  [This list of examples is what came to mind while reading the Elements I provided comment on. I request staff add other planning terminology to list as appropriate. Thank you.]

Below are statements where verbs are requested to more strongly reflect clear planning intent as well as a few other edit or link suggestions.

OUR BUILT ENVIRONMENT
Land Use Element
Page 1
==Program LU-1.2A==
Change "Implement Policy LU-2" to "Implement Policy LU-1.2"

==Policy LU-1.3==
Link "the City's climate action goals" to SR's CCAP.
Link "See the Mobility Element" to Mobility Element in GP 2040 document.

Page 2
==Policy LU-1.5==
Link "areas outside of San Rafael's Urban Service boundary" to a full list of those areas (ie St. Vincent/Silveira?, San Rafael Rock Quarry?)

==Policy LU-1.8==
   a) Link "maximum indicated by General Plan" to where that info is located.

Page 3
==Program LU-1.8A==
Link "allowable lot sizes and densities in the zoning ordinance" and "height limits and a dwelling unit cap" to where defined.

Community Design and Preservation Element
Page 15
==Policy CDP-1.6==
Insert "while maintaining consistent graphic conventions and logos." after "for individual districts"

==Program CDP-3.1B==
Replace "Explore potential" with "Create".

==Program CDP-4.1B==
Replace "higher density" with "multifamily".

==Policy CDP-4.5==
[Wouldn't "Higher Density Design" and "new higher-density housing and mixed use projects" be subject to ODDS as in Program CDP-4.1B?]

OUR NATURAL ENVIRONMENT
Conservation and Climate Change Element
Page 29
Policy C-1.2
Replace "Recognize" with "Optimize"

Page 30
Policy C-1.5
Link "See Goal S-3" to Goal in Safety Element

Policy C-1.9
After "habitat value", insert "and hydrologic function"

Program C-1.9A
Replace "Consider adding" with "Add".

Page 33
"See also Policy C-2.10 on conservation of nearshore waters," Replace C-2.10 with C-3.6.

Program C-1.13A
Change "Data Base" to "Database".

Page 34
Program C-1.14C
Replace "Consider using" with "Coordinate".

Program C-1.14D
Replace "2019" with "2020".

Program C-1.16C
Replace "Consider" with "Create and/or maintain"

Page 35
Program C-1.19A
Replace "Investigate the merits of adopting" with "Adopt"

Page 36
Program C-2.4B
Remove "associated".

Program C-2.6B
Replace "Explore actions to encourage" with "Encourage"

Page 37
Program C-3.2A
Insert "Pollution Protection" between "Stormwater" and "Program".

Page 42
Policy C-5.2
Replace "take into consideration consistency with" with "are consistent with".

Safety Element
Page 55
Program S-1.3A
Change "is" to "are".

Page 62
Program S-4.1A
Add "Protection" between "and" and "Action". Replace (March 2019) with (August 2020).

CONNECTING THE CITY
Mobility Element
Page 73
Program M-1.1A
Replace "Continue to participate in the activities of" with "Actively participate in the planning activities of"

Policy M-1.3
Replace "Participate" with "Actively participate"

Program M-1.3A
Replace "Collaborate" with "Continue to collaborate"
[Project planning is already underway.]

Page 74
Change Policy T-1.5 to Policy M-1.5
Replace "Encourage" with "Support and utilize"

Goal M-2
Replace "provides" with "continuously improves"
[Goal is aspirational and something to work toward.]

Program M-2.1
Replace "consider" with "plan for".

==Program M-2.3==
Replace period at end of sentence with "of all users."

==Policy M-2.3==
Replace "Consider" with "Analyze".

Page 75
==Program M-2.5A==
Replace "The City Traffic Engineer may" with "The City Traffic Engineer shall" in first sentence. Replace "Such studies may" with "Such studies should" in second sentence.
[However, I agree with others who have previously commented that this determination should not reside in the decision-making of one DPW staff member.]

==Program M-2.5C==
In second sentence, replace "City Traffic Engineer may" with "City Traffic Engineer will".
[Similar to comment above, I agree with others that this determination should not reside in the decision-making of one DPW staff member.]

==Policy M 2.6==
In second sentence, insert "and lessen impacts of a project especially in the project area" between "improvements" and "as".

Page 76
==Policy M-2.8==
Replace "Consider" with "Plan".

==Policy M-2.10==
Replace "plans" with "planning".
[Plans often end up on file. Planning is an ongoing action.]

==Policy M2.12==
Replace "Consider" with "Look for".

Page 78
==Policy M-3.4==
It's not clear how San Rafael will "encourage", influence or impact (a), (b), or (c).

==Program M-3.4A==
What tools does San Rafael have available to "encourage" telecommuting?

Page 80
Goal M-4
Insert "efficient" after "affordable" and before "alternative" in first sentence.

Policy M-4.1
Remove "as".

Page 81
Program M-4.3A
Replace "continue" with "improve".
[SMART train collisions continue to cause fatalities.]

Page 85
Program M-6.1A
Replace "Maintain a Bicycle and Pedestrian Master Plan" with "Maintain San Rafael's Bicycle and Pedestrian Master Plan".

Page 87
Program M-6.8C
Insert "and Bicycle" in program title between "Pedestrian" and "Facilities".

<u>Community Services and Infrastructure Element</u>
Page 101
Program CSI-4.17E
Replace "Consider" with "Support".