# Chapter 5
# Alternatives to the Project

## 5.1 Introduction

This chapter presents the alternatives analysis for the San Rafael Transit Center Replacement Project (proposed project), as required by the California Environmental Quality Act (CEQA). It includes a discussion of the CEQA requirements for an alternatives analysis and background information on how the alternatives evaluated in detail in this Environmental Impact Report (EIR)~~considered in detailed analysis~~ were identified.

The concept development process included the identification of sites capable of meeting the program and the transfer needs of patrons; the development of design concepts to site the required transit facilities; an assessment of bus routing and circulation that allows for bus access and exit; the delineation of space for bicycle and pedestrian circulation internally and externally; and the identification of opportunities for supportive uses, urban design, and placemaking components. Concepts were then evaluated for their ability to meet the project objectives and based on feedback received from public outreach to the local communities.

This chapter compares the impacts of the Move Whistlestop Alternative, the preferred alternative, to the impacts of the other three build alternatives analyzed in detail in Chapter 3, Environmental Analysis, and the No-Project Alternative. In this chapter, the alternatives are evaluated for their comparative ability to minimize adverse environmental effects. The chapter evaluates the alternatives' impacts compared to existing environmental conditions and compared to the impacts of the preferred alternative. Finally, it describes other alternative concepts that were considered but eliminated from detailed consideration in this ~~Draft~~ EIR and the reasons for their elimination.

## 5.2 CEQA Requirements for Alternatives Analysis

The State CEQA Guidelines require the analysis of a reasonable range of alternatives to a proposed project or to the location of a project that would feasibly attain most of the basic objectives of the project and avoid or substantially lessen the significant effects of the project (State CEQA Guidelines Section 15126.6(a)). The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to foster informed public participation and an informed and reasoned choice by the decision-making body (State CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean the ability to be accomplished in a successful manner within a reasonable timeframe, taking into account economic, environmental, social, technological, and legal factors. The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (State CEQA Guidelines Section 15126.6(f)(1)). An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote and speculative. Furthermore, an EIR need not consider every conceivable alternative but must consider a reasonable range of alternatives that will foster informed decision-making and public participation.

CEQA also requires the evaluation of a no-project alternative (State CEQA Guidelines Section 15126.6(e)). The analysis of a no-project alternative is based on the assumption that the proposed project would not be approved. In certain instances, the no-project alternative means "no build," wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in the preservation of existing environmental conditions, the no-project alternative should identify the practical result of the project's non-approval rather than create and analyze a set of artificial assumptions to preserve the existing physical environment.

An environmentally superior alternative must also be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impact on the project site and affected environment. If a no-project alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives (State CEQA Guidelines Section 15126.6(e)(2)).

State CEQA Guidelines Section 15126.6(c) also requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the basic project objectives. Those alternatives that would have impacts identical to or more severe than those of the proposed project or would not meet most of the basic project objectives were rejected from further consideration.

# 5.3 Alternatives Selection

The goal of developing a set of possible alternatives is to identify other means for attaining the project objectives while substantially lessening or avoiding one or more of the significant environmental impacts potentially caused by the proposed project. The proposed project's objectives and significant impacts and comments received during the public scoping period were considered in developing a reasonable range of alternatives for analysis, so that the alternatives analyzed meet most of the objectives and avoid or minimize at least one of the proposed project's significant impacts.

## 5.3.1 Project Objectives

The Golden Gate Bridge, Highway and Transportation District (District), in coordination with the City of San Rafael (City), Marin County Transit District (Marin Transit), Transportation Authority of Marin (TAM), and Sonoma-Marin Area Rail Transit (SMART), plans to replace the transit center in Downtown San Rafael. The proposed project is needed primarily to replace the existing transit center following the loss of some of the transit center facilities that resulted from the implementation of the SMART Phase 2 line to Larkspur. Specifically, the project objectives are to:

- Provide improved transit connectivity and ease of use in and around Downtown San Rafael.
- Enhance local and regional transit use by bringing together multiple modes of the transportation network—including the SMART-bus connection—into a hub that affords transit users the safest, most efficient means of using bus and rail services.
- Efficiently accommodate transit users and services, optimize operating costs, and improve transit desirability.

- Design a functional, attractive, cost-effective facility that can meet long-term projected service levels and be implemented in an expeditious manner, so as to minimize the period of use of the interim facility.
- Provide a transit facility that is readily accessible to individuals with disabilities, transit users, and transit-dependent populations, including those with low incomes.
- Provide a secure, safe, and inviting space for transit patrons.
- Create a more accessible transit facility for all users by reducing vehicular, rail, bicycle, and pedestrian conflicts and improving safety.
- Provide convenient, pedestrian connections to surrounding land uses.

### 5.3.2 Summary of Significant Impacts of the Move Whistlestop Alternative (Preferred Alternative)

The EIR did not identify any significant and unavoidable impacts of the Move Whistlestop Alternative. The EIR identified significant impacts that would be reduced to less-than-significant levels with mitigation in the resource areas of air quality, biological resources, cultural resources, energy, greenhouse gases (GHGs), hazards and hazardous materials, noise, and tribal cultural resources.

## 5.4 Alternatives Analysis

The following section describes the alternatives that were selected and evaluated in equal detail to the preferred alternative. The No-Project Alternative is required under State CEQA Guidelines Section 15126.6(e). The selected alternatives, which were developed by the project proponent with input from the local communities, were identified based on their ability to meet the needs of transit users and achieve the project objectives. The alternatives evaluated in equal detail to the preferred alternative are the following:

- ~~No-Project Alternative~~
- Adapt Whistlestop Alternative
- 4th Street Gateway Alternative
- Under the Freeway Alternative

The impacts of the Move Whistlestop Alternative, Adapt Whistlestop Alternative, 4th Street Gateway Alternative, and Under the Freeway Alternative are analyzed in Chapter 3, Environmental Analysis. Table 5-1 provides a comparison between the impacts of the preferred alternative, the Move Whistlestop Alternative, to the impacts of the build alternatives analyzed in equal detail and the No-Project Alternative.

# 5.4.1 No-Project Alternative

## 5.4.1.1 Description

The No-Project Alternative is based on what would reasonably be expected to occur if the proposed project is not implemented. Under the No-Project Alternative, the District would not relocate the transit center; it would remain at its current location in Downtown San Rafael between 2nd Street, 3rd Street, West Tamalpais Avenue, and Hetherton Street and continue to operate as it does currently.

The southward extension of SMART to Larkspur in late 2019 required the construction of two sets of tracks through the middle of the existing transit center site south of 3rd Street. The SMART tracks bisect the existing transit center, which required reconfiguration of platforms. These changes have led to reduced bus operations, site functionality, and capacity including eliminating existing bus and taxi staging platforms as well as some bicycle facilities; inhibiting some bus turning movements; increasing bus congestion within the transit center; increasing queuing on surrounding surface streets during train crossing events; and channelizing pedestrian circulation within the transit center area. Pedestrian access and transfer activity among the remaining platforms at the transit center has also been disrupted. The existing transit center is deficient in bus operations, connectivity between modes, and pedestrian safety. The 17 existing bus bays are fully utilized at peak times and provides limited opportunity for growth in transit service. Additionally, there is limited adjacent space available for provision of paratransit, pick-up/drop-off, maintenance vehicle, and shuttle curb space.

The No-Project Alternative would include the existing transit center, which has been compromised by the implementation of the SMART Phase 2 line. This facility would not meet the project objective to provide improved transit connectivity and ease of use in and around Downtown San Rafael. Connectivity and ease of use would not be improved. The No-Project Alternative would not improve local and regional transit use by enhancing the integration of multiple modes of the transportation network, including the SMART-bus connection. The existing transit center would remain separated from the SMART station by heavily traveled 3rd Street and would require users to navigate between stations. Other improvements to the safety, accessibility, and functionality of transit would not be achieved if the No-Project Alternative were implemented.

Additionally, the No-Project Alternative would not meet the transportation goals established in the *San Rafael Transit Center Relocation Study* (City of San Rafael et al. 2017), the *San Rafael Downtown Station Area Plan* (City of San Rafael 2012), the long-range *Strategic Vision Plan* (TAM 2017), or *Plan Bay Area 2040* (MTC and ABAG 2017). The No-Project Alternative would also not meet the goals proposed in ~~the Draft~~ *San Rafael General Plan 2040* (City of San Rafael 2021~~2020a~~) and ~~Draft~~ *Downtown San Rafael Precise Plan* (City of San Rafael Community Development Department 2021~~2020b~~).

## 5.4.1.2 Impacts

### Aesthetics

Under the No-Project Alternative, there would be no change to the current views, visual character, daytime glare, and nighttime lighting. With respect to aesthetics, impacts under this alternative would be less than those of the Move Whistlestop Alternative.

## Air Quality

No construction would occur with the No-Project Alternative. As a result, none of the short-term construction-related emissions resulting from the Move Whistlestop Alternative (preferred alternative) would occur. Mitigation measures are identified in this EIR that would reduce potential air quality impacts during project construction of the build alternatives to a less-than-significant level. The No-Project Alternative would not require mitigation to offset this impact. Therefore, impacts on air quality under this alternative would be less than those of the Move Whistlestop Alternative. Operational emissions under the No-Project Alternative would be similar to emissions analyzed for the Move Whistlestop Alternative and other build alternatives and would result in less-than-significant air quality impacts. The No-Project Alternative would not provide the decreased congestion associated with the Move Whistlestop Alternative. Therefore, the No-Project Alternative would not have the beneficial operational impacts on air quality identified for ~~under this alternative would be less beneficial than those of~~ the Move Whistlestop Alternative.

## Biological Resources

The No-Project Alternative would avoid construction and operational impacts related to tree removal and potential disturbance to nesting birds and, therefore, impacts on biological resources under this alternative would be less than those of the Move Whistlestop Alternative.

## Cultural Resources

Potential disruption to unknown historic, archaeological, and paleontological resources would not occur with this alternative because there would be no ground disturbance. Therefore, the construction impacts on cultural resources under this alternative would be less than those of the Move Whistlestop Alternative. Because operation of the transit center under the No-Project Alternative would involve the same activities as described for the preferred alternative and build alternatives as analyzed in Section 3.4, Cultural Resources, impacts would be the same under the No-Project Alternative.

## Energy

The No-Project Alternative would not have temporary impacts on energy use from construction. The existing transit center is less energy efficient than the new facility that would be constructed under the Move Whistlestop Alternative. Therefore, construction of the No-Project Alternative would have less of an impact than the Move Whistlestop Alternative. However, o~~O~~peration of the No-Project Alternative would not have the beneficial impacts of the Move Whistlestop Alternative.

## Geology and Soils

No construction would occur under the No-Project Alternative. Therefore, none of the geologic/soils impacts associated with construction ~~and operation~~ would occur. Mitigation measures are identified in this EIR that would reduce potential geology and soils impacts from construction of the build alternatives to a less-than-significant level. The No-Project Alternative would have no need for such mitigation. Therefore, the construction impacts on geology and soils would be less than those of the Move Whistlestop Alternative. Operation of the No-Project Alternative would consist of the same activities analyzed in Section 3.6, Geology and Soils, and therefore operational impacts generally would be the same as described for the preferred alternative and build alternative.

## Greenhouse Gas Emissions

No new construction would occur with the No-Project Alternative. As a result, none of the short-term construction-related emissions resulting from the anticipated development would occur under this alternative. Therefore, impacts related to ~~greenhouse gas~~GHG emissions under this alternative would be less than those of the Move Whistlestop Alternative. There would be GHG emissions from continued operation of the existing transit center. Provisions of the 2017 Scoping Plan that apply to new buildings (discussed in detail in Section 3.7, Greenhouse Gas Emissions) would not apply to the continued use of the existing facility under the No Project Alternative. The existing transit center would continue to operate as it currently does, such that there would not be a conflict with applicable plans and policies. Operational impacts for the No-Project Alternative would be less than significant, as determined for the Move Whistlestop Alternative.

## Hazards and Hazardous Materials

Under the No-Project Alternative, as there would be no construction, there would be no risk of exposure to potentially hazardous materials due to construction materials and ground disturbance. Operational risks related to hazards and hazardous materials under the No-Project Alternative would be similar to those of the Move Whistlestop Alternative. Therefore, impacts related to hazards and hazardous materials under this alternative would be less than those of the Move Whistlestop Alternative during construction and similar to those of the Move Whistlestop Alternative during operation.

## Hydrology and Water Quality

Under the No-Project Alternative, the existing drainage patterns in the project area would be maintained. The No-Project Alternative would not result in temporary impacts on water quality related to construction. Therefore, impacts on hydrology and water quality under this alternative would be less than those of the Move Whistlestop Alternative.

## Land Use and Planning

The No-Project Alternative would result in a continuation of the existing uses in the project area. This alternative would also be consistent with ~~*The City of San Rafael General Plan 2020* and~~ City zoning regulations. However, the No-Project Alternative would not be compatible with the vision for a replaced transit center contained in the *San Rafael Downtown Station Area Plan* (City of San Rafael 2012), TAM's *Strategic Vision Plan* (2017), or *Plan Bay Area 2040* (MTC and ABAG 2017). The No-Project Alternative would not be compatible with ~~the Draft~~ *San Rafael General Plan 2040* (City of San Rafael ~~2020a~~2021) and ~~Draft~~ *Downtown San Rafael Precise Plan* (City of San Rafael Community Development Department ~~2020b~~2021). This would be a significant and unavoidable impact.

## Noise ~~and Vibration~~

With the No-Project Alternative, there would be no short-term construction noise impacts. Therefore, impacts related to noise and vibration under this alternative would be less than those of the Move Whistlestop Alternative. Operational impacts on noise and vibration under existing conditions, which would continue under the No-Project Alternative, are described in Section 3.11, Noise, and would be similar to those of the Move Whistlestop Alternative. The No-Project Alternative would not provide the decreased congestion associated with the Move Whistlestop Alternative, which may result in increased noise compared to the~~. Therefore, operational impacts on~~

~~noise under the No-Project Alternative would be less beneficial than those of the~~ Move Whistlestop Alternative.

## Population and Housing

The No-Project Alternative would result in the continuation of existing uses in the project area. There would be no effect on population growth or demand for housing. Therefore, the impacts on population and housing under this alternative would be equal to those of the Move Whistlestop Alternative.

## Public Services and Recreation

Under the No-Project Alternative, there would be no ~~temporary~~ impacts on public service providers related to compromised access for emergency vehicles during construction and operation. Therefore, impacts on public services and recreation under this alternative would be less than those of the Move Whistlestop Alternative.

## Transportation

Under the No-Project Alternative, the temporary impacts on traffic and transportation related to construction of the Move Whistlestop Alternative would not occur. Therefore, construction impacts on traffic and transportation under this alternative would be less than those of the Move Whistlestop Alternative. During operation, the No-Project Alternative would not provide the decreased congestion associated with the Move Whistlestop Alternative. It would also not have the beneficial impact of integration between transit modes. The No-Project Alternative would not provide additional bicycle or pedestrian connectivity in the project area and existing safety concerns for transit users transferring between transit modes would remain. The No-Project Alternative would not have the beneficial operational impacts on traffic and transportation that would occur under the Move Whistlestop Alternative. Additionally, the No-Project Alternative would not be compatible with the vision for a replaced transit center contained in the *San Rafael Downtown Station Area Plan* (City of San Rafael 2012), TAM's *Strategic Vision Plan* (2017), *Plan Bay Area 2040* (MTC and ABAG 2017), or ~~the Draft~~ *San Rafael General Plan 2040,* including Program M-4.7A: Transit Center Relocation. With the No-Project Alternative the operational capacity constraints of the existing transit center would remain. Transit operators would be severely limited in their ability to add transit service or adjust schedules to meet future needs. Access to bus bays would remain constrained, which would ~~impact~~ affect flexibility in fleet composition and bus routing. This would likely constrain future transit service and bus network design. This impact would be significant and unavoidable under the No-Project Alternative.

## Tribal Cultural Resources

Under the No-Project Alternative, there would be no potential impacts from disturbance to identified resources of tribal cultural significance or unanticipated discovery of tribal cultural resources. Therefore, the impact of this alternative on tribal cultural resources would be less than ~~those~~ that of the Move Whistlestop Alternative.

## Utilities and Service Systems

Under the No-Project Alternative, there would be no impacts associated with construction, and impacts would therefore be less than under the No-Project Alternative. Operation of the ~~The~~ No-

Project Alternative would result in the continuation of existing uses in the project area and would not require modification to any of the existing utilities and service systems at the existing transit center. ~~Therefore, i~~Operational impacts on utilities and service systems under this alternative would be ~~less than~~similar to those of the Move Whistlestop Alternative.

### Wildfire

Given the location of the No-Project Alternative in relation to the location of the Move Whistlestop Alternative, the existing transit facility would have a comparable level of wildfire risk to that of the Move Whistlestop Alternative. Therefore, impacts from this alternative related to wildfires would be comparable to those of the Move Whistlestop Alternative.

## 5.4.2 Build Alternatives

The Adapt Whistlestop, 4th Street Gateway, and Under the Freeway Alternatives would vary in site area and location; specific features and facilities would vary. These alternatives share the following components:

- 17 straight-curb bus bays to accommodate transit, airport coach service, and Greyhound services at the transit center
- Provision of paratransit, pick-up/drop-off, maintenance vehicle, and shuttle curb space
- Provision of bicycle parking, including racks and lockers
- Minimum 9-foot-wide platforms adjacent to bus bays
- Platforms providing passenger amenities including weather protection (such as shelters or canopies) and seating
- Other features including public art, security, and wayfinding signage
- Provision of a roughly 3,000-square-foot building including customer service, public restrooms, driver relief facilities, small retail, maintenance, and security
- Existing transit center facility to be vacated; no plans for use of the site once vacated

Due to these shared features, the Adapt Whistlestop, 4th Street Gateway, and Under the Freeway Alternatives all generally meet the project objectives. Any variation in these alternatives' ability to meet the project objectives is discussed in the below descriptions.

### 5.4.2.1 Adapt Whistlestop Alternative

The site is generally between West Tamalpais Avenue to the west and Hetherton Street to the east, 4th Street to the north, and 3rd Street to the south. This alternative would include the construction of a bike path and pedestrian improvements on the west side of West Tamalpais Avenue from 2nd Street to 4th Street. See Figure 2-5 for the site plan. This alternative is on the same block as the existing SMART station. This alternative includes nine parcels currently occupied by the Whistlestop building, a café, a restaurant, parking spaces, the SMART tracks, and the Citibank building with its affiliated parking lot, also referred to as the "Citibank parcel." Surrounding the project site are retail, commercial, and office uses to the north, US-101 to the east, the existing San Rafael Transit Center to the south, and restaurants, residential, and retail facilities to the west.

The Adapt Whistlestop Alternative would feature five platforms, A through E, and one District building. There would be 17 straight-curb bus bays to accommodate transit, airport coach service, and Greyhound services at the transit center.

The Whistlestop building (minus the Jackson Café) would be renovated or remodeled to serve as District customer service and operations building space. Some of the space within the building could be allocated for non-District uses. Tamalpais Avenue between 3rd and 4th Streets would be limited to buses only. Bus bays on the Citibank parcel would be accessed via driveways along 3rd and 4th Streets. The area on the southeast corner of the intersection of Tamalpais Avenue and 4th Street would be provided for bicycle parking. The area west of West Tamalpais Avenue between 3rd and 4th Streets (i.e., space not utilized by the relocated Whistlestop building) would be provided for public plazas, customer service, bicycle parking, and/or transit-supportive land uses. The existing SMART pick-up/drop-off area on East Tamalpais Avenue would be removed and replaced with passenger pick-up/drop-off in a new access alley constructed to the west of West Tamalpais Avenue between 3rd Street and 4th Street. The new access alley would also contain maintenance vehicle parking for six District vehicles. The access alley would connect to a new driveway on 4th Street between Tamalpais Avenue and Lincoln Avenue that would replace the removed driveway on West Tamalpais Avenue to the condo complex at Lincoln Avenue and 4th Street~~for six vehicles on West Tamalpais Avenue between 4th Street and 5th Avenue~~. Fifty feet of shuttle parking would be provided on West Tamalpais Avenue between 3rd Street and 4th Street.~~Maintenance vehicle parking for six District vehicles would be provided on West and East Tamalpais Avenues between 4th Street and 5th Avenue. A new driveway would be installed on 4th Street between West Tamalpais Avenue and Lincoln Avenue to replace the removed driveway on West Tamalpais Avenue to the condo complex at Lincoln Avenue and 4th Street. Space would be provided for public plazas, customer service, bicycle parking, and/or transit-supportive land uses.~~ Construction of the bicycle path on Tamalpais Avenue from 2nd Street to 4th Street would reflect implementation of one of the City's planned bicycle infrastructure improvements. This bike path would connect to the Mahon Creek Path. Additionally, the Move Whistlestop Alternative would include new on-street parking on West Tamalpais Avenue between 2nd Street and 3rd Street. This alternative would generally meet the project objectives.

See Chapter 2, Project Description, for more detail on this alternative and Chapter 3, Environmental Analysis, for the detailed analysis of impacts due to construction and operation of the Adapt Whistlestop Alternative. The Adapt Whistlestop Alternative would lessen the following potentially significant impacts of the Move Whistlestop Alternative (the preferred alternative):

- **Impact EN-1:** Section 3.5, Energy, determines that the preferred Move Whistlestop Alternative would have a potentially significant impact due to construction energy usage and consumption. This impact would be mitigated to a less-than-significant level with implementation of MM-GHG-CNST-1, which requires implementation of the Bay Area Air Quality Management District's (BAAQMD's) best management practices (BMPs) and applicable California Green Building Code requirements to reduce GHG emissions from construction. While the Adapt Whistlestop Alternative would also result in potentially significant impacts due to construction energy usage and consumption, as shown in Table 3.5-3, the Adapt Whistlestop Alternative (8,495 million British thermal units [BTUs]) would result in less energy consumption during construction than the Move Whistlestop Alternative (8,600 million BTUs), thereby lessening a potentially significant impact of the proposed project. Construction of this alternative would consume less energy than construction of the Move Whistlestop Alternative, as it is estimated to require fewer

truck hauling trips (i.e., less energy consumed in the form of diesel or gasoline) to remove debris.

- **Impact GHG-1:** Section 3.7, Greenhous Gas Emissions, determines that the preferred Move Whistlestop Alternative would have a potentially significant impact due to the generation of GHG emissions during construction. This impact would be mitigated to a less-than-significant level with implementation of MM-GHG-CNST-1, which requires implementation of BAAQMD's BMPs and applicable California Green Building Code requirements to reduce GHG emissions from construction. While the Adapt Whistlestop Alternative would also result in potentially significant impacts related to the generation of GHG emissions during construction, as shown in Table 3.7-4, the Adapt Whistlestop Alternative would result in less GHG emissions than the Move Whistlestop Alternative, thereby lessening a potentially significant impact of the proposed project. All the build alternatives are similar in size, so it was conservatively assumed that they would have identical off-road construction equipment fleets; however, the Adapt Whistlestop Alternative would require a smaller amount of construction and demolition debris to be hauled off site.

#### 5.4.2.2 4th Street Gateway Alternative

This alternative site is bounded by 5th Avenue, 3rd Street, Hetherton Street, and the SMART tracks, as well as curb space along West Tamalpais Avenue; see Figure 2-6 in Chapter 2, Project Description, for the site plan. North of 4th Street, the existing project site is currently occupied by offices and retail (salons and a bagel shop) and associated parking spaces. Citibank and its affiliated parking lot currently occupy the existing portion of the site south of 4th Street. To the west of the Citibank parcel are the SMART tracks, which align the western portion of the southern section of the project site. Adjacent to the tracks are the Whistlestop building and Jackson Café. Surrounding the project site are retail and office uses to the north, US-101 to the east, the existing San Rafael Transit Center to the south, and restaurants and retail facilities to the west.

The 4th Street Gateway Alternative would feature six platforms, A through F, and two District buildings. There would be three on-street bays located curbside on the west side of Hetherton Street between 4th Street and 5th Avenue. In order to accommodate these curbside bays, southbound right turns from Hetherton Street to 4th Street would be precluded. On the east side of both sites, space would be provided for public plazas, customer service, bicycle parking, and/or transit-supportive land uses.

Under this alternative, the District building would be one story and an estimated 3,000 square feet. It would include a driver break room with restrooms, District offices and customer support area with restrooms and a kitchen, and a public lobby with a service counter and restrooms.

This alternative would generally meet the project objectives; however, it would result in increased intersection delays, longer corridor travel times, and gridlock conditions and would not include the construction of the City's proposed bicycle facilities that would be constructed under the preferred alternative, meaning that it conflicts with the project objective to create a more accessible transit facility for all users by reducing vehicular, rail, bicycle, and pedestrian conflicts. This alternative would also require the acquisition of additional parcels, which would increase project costs and result in this alternative less fully meeting the project objective to design a cost-effective facility.

See Chapter 2, Project Description, for more detail on this alternative and Chapter 3, Environmental Analysis, for the detailed analysis of impacts from the 4th Street Gateway Alternative. The 4th Street

Gateway Alternative would lessen the following potentially significant impacts of the Move Whistlestop Alternative (the preferred alternative):

- **Impact EN-1:** Section 3.5, Energy, determines that the preferred Move Whistlestop Alternative would have a potentially significant impact due to construction-related energy usage and consumption. This impact would be mitigated to a less-than-significant level with implementation of MM-GHG-CNST-1, which requires implementation of BAAQMD's BMPs and applicable California Green Building Code requirements to reduce GHG emissions from construction. While the 4th Street Gateway Alternative would also result in potentially significant impacts due to construction-related energy usage and consumption, as shown in Table 3.5-3, the 4th Street Gateway Alternative (8,526 million BTUs) would result in less energy consumption during construction than the Move Whistlestop Alternative (8,600 million BTUs), thereby lessening a potentially significant impact of the proposed project. Construction of this alternative would consume less energy than construction of the Move Whistlestop Alternative, as it is estimated to require fewer truck hauling trips (i.e., less energy consumed in the form of diesel or gasoline) to remove debris.
- **Impact GHG-1:** Section 3.7, Greenhouse Gas Emissions, determines that the preferred Move Whistlestop Alternative would have a potentially significant impact due to the generation of GHG emissions during construction. This impact would be mitigated to a less-than-significant level with implementation of MM-GHG-CNST-1, which requires implementation of BAAQMD's BMPs and applicable California Green Building Code requirements to reduce GHG emissions from construction. While the 4th Street Gateway Alternative would also result in potentially significant impacts due to the generation of GHG emissions during construction, as shown in Table 3.7-4, the 4th Street Gateway Alternative would result in less GHG emissions than the Move Whistlestop Alternative, thereby lessening a potentially significant impact of the proposed project.
- **Impact HAZ-3:** Section 3.8, Hazards and Hazardous Materials, determines that the preferred Move Whistlestop Alternative would have potentially significant impacts due to the proximity of this alternative to an existing or proposed school. Limited quantities of hazardous materials commonly used in construction and during routine maintenance activities may be required for project construction and transported past Saint Raphael School for delivery to or removal from the project site, resulting in a potentially significant impact that would be mitigated to a less-than-significant level with implementation of MM-HYD-CNST-1, which includes preparation and implementation of a stormwater pollution prevention plan (SWPPP). The SWPPP would include BMPs designed to ensure proper handling of hazardous materials utilized or encountered during construction activities and compliance with applicable regulations and policies. No schools are within 0.25 mile of the 4th Street Gateway Alternative. Therefore, while the Move Whistlestop Alternative has the potential to result in significant impacts, the 4th Street Gateway Alternative would result in no impact.
- **Impact NOI-1:** The preferred Move Whistlestop Alternative would have potentially significant impacts due to the exceedance of the City's daytime and nighttime noise limits during construction. As discussed in Section 3.11, Noise, mitigation would reduce this impact to a less-than-significant-level. The 4th Street Gateway Alternative would lessen the magnitude of this potentially significant impact. Under this alternative, construction noise levels would be less than under the Move Whistlestop Alternative during site demolition. Impacts from the exceedance of daytime noise limits would be avoided and impacts from the exceedance of nighttime noise limits would be less than for the Move Whistlestop Alternative. Mitigation

would still be required for impacts related to nighttime noise levels under the 4th Street Gateway Alternative, but the impact requiring mitigation would be of a lesser magnitude under this alternative due to its location farther from the sensitive receptors affected under the Move Whistlestop Alternative.

### 5.4.2.3 Under the Freeway Alternative

This alternative site is generally located beneath US-101 and bounded by 5th Avenue, south of 4th Street, Irwin Street, and Hetherton Street; see Figure 2-7 for the site plan. Underneath US-101 there are four park-and-ride lots, maintained and operated by the California Department of Transportation (Caltrans), in the vicinity of the existing transit center. Irwin Creek, underneath US-101, flows parallel to US-101. North of 4th Street the existing project site is currently occupied by offices and parking, and south of 4th Street the site is currently occupied by retail and offices. Surrounding the project site are residences and ~~tial~~ offices to the north; retail and residences to the east; retail and offices to the south; and retail uses, restaurants, and residential offices to the west.

The Under the Freeway Alternative would feature six platforms, A through F. The affiliated bus bays would be accessed via driveways on 4th Street, Irwin Street, and Hetherton Street. Internal circulation would be provided to allow buses accessing bays from either side of the site to egress on either side as well, which is critical given the diverse bus routing accessing the site. Space would be provided for public plazas, customer service, and/or transit-supportive land uses. This would require three bridges/viaducts over Irwin Creek to connect Hetherton Street to the bus bays.

Under this alternative, the District building would be one story and an estimated 3,000 square feet. It would include a driver break room with restrooms, District offices and customer support area with restrooms and a kitchen, and a public lobby with a service counter and restrooms.

This alternative would generally meet the project objectives; however, its location under the freeway would affect site visibility and partially conflict with the objective to provide a secure, safe, and inviting space for transit patrons. Additionally, this alternative would not include the construction of the City's proposed bicycle facilities that would be constructed under the preferred alternative, meaning that it less fully meets the project objective to create a more accessible transit facility for all users by reducing vehicular, rail, bicycle, and pedestrian conflicts. Additionally, this alternative would result in bus services being located farther from the SMART platform than under the preferred alternative. Therefore, this alternative less fully meets the objective of bringing together multiple modes of the transportation network—including the SMART-bus connection—into a hub that affords transit users the safest, most efficient means of using bus and rail services. This alternative would also require the acquisition of additional parcels, which would increase project costs and result in this alternative less fully meeting the project objective to design a cost-effective facility.

See Chapter 2, Project Description, for more detail on this alternative and Chapter 3, Environmental Analysis, for the detailed analysis of impacts from the Under the Freeway Alternative. The Under the Freeway Alternative would lessen the following potentially significant impacts of the Move Whistlestop Alternative (the preferred alternative):

- **Impact HAZ-3:** Section 3.8, Hazards and Hazardous Materials, determines that the preferred Move Whistlestop Alternative would have potentially significant impacts due to the proximity of this alternative to an existing or proposed school. Limited quantities of hazardous materials commonly used in construction and during routine maintenance activities may be required for

project construction and transported past Saint Raphael School for delivery to or removal from the project site, resulting in a potentially significant impact that would be mitigated to a less-than-significant level with implementation of MM-HYD-CNST-1, which includes preparation and implementation of a SWPPP. The SWPPP would include BMPs designed to ensure proper handling of hazardous materials utilized or encountered during construction activities and compliance with applicable regulations and policies. No schools are within 0.25 mile of the Under the Freeway Alternative. Therefore, while the Move Whistlestop Alternative has the potential to result in significant impacts, the Under the Freeway Alternative would result in no impact.

- **Impact NOI-1:** The preferred Move Whistlestop Alternative would have potentially significant impacts due to the exceedance of the City's daytime and nighttime noise limits during construction. As discussed in Section 3.11, Noise, mitigation would reduce this impact to a less-than-significant-level. The Under the Freeway Alternative would lessen the magnitude of this potentially significant impact. Under this alternative, construction noise levels would be less than under the Move Whistlestop Alternative during site demolition. Impacts from the exceedance of daytime noise limits would be avoided and impacts from the exceedance of nighttime noise limits would be less than those for the Move Whistlestop Alternative. Mitigation would still be required for impacts related to nighttime noise levels under the Under the Freeway Alternative, but the impact requiring mitigation would be of a lesser magnitude under this alternative due to its location farther from the sensitive receptors affected under the Move Whistlestop Alternative.

### 5.4.3 Comparison of Impacts of the Preferred Alternative and Other Alternatives

Table 5-1 provides a comparison of the impacts of the preferred alternative, which is the Move Whistlestop Alternative, to the impacts of the build alternatives and the No-Project Alternative. Note that minor variations in the magnitude of impacts among alternatives are not reflected in this table, which compares the general impact determinations provided in this EIR (i.e., no impact, less than significant, less than significant with mitigation, and significant and unavoidable).

**Table 5-1. Comparison of Other ~~Build~~ Alternatives to the Preferred Alternative**

| Resource | Move Whistlestop Alternative (Preferred Alternative) Level of Impact | No-Project Alternative | | Adapt Whistlestop Alternative | | 4th Street Gateway Alternative | | Under the Freeway Alternative | |
|---|---|---|---|---|---|---|---|---|---|
| | | Level of Impact | Comparison to Preferred Alternative | Level of Impact | Comparison to Preferred Alternative | Level of Impact | Comparison to Preferred Alternative | Level of Impact | Comparison to Preferred Alternative |
| Aesthetics | LTS | NI | < | LTS | = | LTS w/MM | > | LTS w/MM | > |
| Air Quality | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | = | LTS w/MM | = |
| Biological Resources | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | = | LTS w/MM | > |
| Cultural Resources | LTS w/MM | NI | < | LTS w/MM | = | SU | > | SU | > |
| Energy | LTS w/MM | NI | <[a] | LTS w/MM | = | LTS w/MM | = | LTS w/MM | = |
| Geology and Soils | LTS | NI | < | LTS | = | LTS | = | LTS | = |
| Greenhouse Gas Emissions | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | = | LTS w/MM | = |
| Hazards and Hazardous Materials | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | = | LTS w/MM | = |
| Hydrology and Water Quality[b] | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | = | LTS w/MM | > |
| Land Use and Planning | LTS | SU | <[a] | LTS | = | LTS | = | LTS | = |
| Noise and Vibration | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | > | LTS w/MM | > |
| Population and Housing | LTS | NI | < | LTS | = | LTS | = | LTS | = |
| Public Services and Recreation | LTS | NI | < | LTS | = | LTS | = | LTS | = |
| Transportation | LTS | SU | >[a] | LTS | = | SU | > | SU | > |
| Tribal Cultural Resources | LTS w/MM | NI | < | LTS w/MM | = | LTS w/MM | = | LTS w/MM | = |
| Utilities and Service Systems | LTS | NI | < | LTS | = | LTS | = | LTS | = |
| Wildfire | LTS | NI | < | LTS | = | LTS | = | LTS | = |

NI: No Impact
LTS: Less than Significant
LTS w/MM: Less than Significant with Mitigation
SU: Significant and Unavoidable

<: Impacts would be less than the impacts of the Move Whistlestop Alternative.
>: Impacts would be greater than the impacts of the Move Whistlestop Alternative.
=: Impacts would be equivalent to the impacts of the Move Whistlestop Alternative.

[a] Under the No-Project Alternative, the beneficial transportation impacts of the Move Whistlestop Alternative would not occur.
[b] This change is to correct a typographical error in the Draft EIR, not a change to impact significance between the Draft and Final EIRs.

## 5.4.4 Environmentally Superior Alternative

The State CEQA Guidelines require that an environmentally superior alternative be identified. The environmentally superior alternative is the alternative that would avoid or substantially lessen, to the greatest extent feasible, the environmental impacts associated with the project while feasibly obtaining most of the major project objectives. If the alternative with the least environmental impact is determined to be the no-project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

The identification of the environmentally superior alternative results from a comparison of the impacts associated with each alternative to the preferred alternative, as shown in Table 5-1. Table 5-1 shows that the No-Project Alternative would avoid the construction-related impacts associated with the build alternatives. However, the No-Project Alternative would result in significant and unavoidable land use and transportation impacts related to continued operations at the existing transit center. In addition, the No-Project Alternative fails to meet most of the basic project objectives.

Comparing the build alternatives to the preferred alternative, the 4th Street Gateway Alternative and the Under the Freeway Alternative would have worsened impacts than the preferred alternative (Table 5-1), including significant and unavoidable impacts on cultural resources under the 4th Street Gateway Alternative and the Under the Freeway Alternative and significant and unavoidable impacts on transportation under the 4th Street Gateway Alternative. In contrast, there would be no significant and unavoidable impacts associated with the preferred alternative, the Move Whistlestop Alternative.

Therefore, of the build alternatives considered in equal detail to the preferred alternative, the Adapt Whistlestop Alternative would have the least environmental impacts and would meet the project objectives. The environmental impacts of the Adapt Whistlestop Alternative would be similar to or slightly less than the impacts identified for the preferred alternative, the Move Whistlestop Alternative. For these reasons, the Adapt Whistlestop Alternative is considered the Environmentally Superior Alternative.

## 5.4.5 Alternatives Considered but Eliminated from Further Analysis

The following alternatives were identified based on a review of previous documents prepared for the proposed project, including the *Environmental Scoping Report for the San Rafael Transit Center Replacement Project* (ICF 2019; see Appendix A) and the *San Rafael Transit Center Relocation Study* (City of San Rafael et al. 2017).

### 5.4.5.1 Two-Story Concept

This concept for the transit center would utilize the parcel across 3rd Street from the existing transit center and across the street from the SMART station as the ground level of a two-story transit center. In scoping, it was determined that the amount of ramping needed to deck over the ground-floor portion of the transit center would not fit within the identified parcel, and, therefore, work would need to extend over 3rd Street into the site of the existing transit center. The upper level would need to extend farther into the existing transit center site to accommodate the appropriate

number of bus bays, which would interrupt operation of the existing transit center while the new facility is being constructed.

This concept would include six bays on the ground level of the facility and 12 bays on the upper level of the facility. Pick-up and drop-off facilities would be provided on the ground level at the site of the existing transit center. Stairs and elevators would provide vertical circulation to access the upper level. The ramp leading to the upper level would be accessed via a driveway on Hetherton Street. The ramp down would egress onto Hetherton Street at the 3rd Street and Hetherton Street intersection. The signal at the 3rd Street and Hetherton Street intersection would need to be modified to accommodate an exclusive bus movement phase. Additional facilities, such as customer service, restrooms, retail, etc., could be provided on the upper level of the new transit center.

The primary advantages of this concept are that it concentrates transit activity at one location, enabling transfers between buses and SMART to all occur on one block. The main drawbacks are the challenges that come with a two-level structure: concerns around cost, safety, aesthetics, and constructability.

This alternative would meet the project objectives of providing improved transit connectivity and ease of use in and around Downtown San Rafael, enhancing local and regional transit use by bringing together multiple modes of transportation, and providing a secure, safe, and inviting space for transit patrons. This alternative would meet these objectives by constructing a single facility that would house expanded bus capacity as compared to the existing facility and provide a convenient connection to the SMART platform.

However, this alternative would not meet the project objective of a cost-effective facility, as construction of a two-story facility would result in additional expenses due to the more complex design. These costs would have implications on the operational economic success of the transit center, as it would take a longer amount of time to recoup the investment required for a two-story facility. This alternative could also raise accessibility concerns. Additionally, operations of this alternative would compromise efficiency due to the need for vertical circulation movement to access the second story, resulting in increased potential for operational impacts related to safety from the ramps becoming blocked or otherwise inaccessible. For these reasons, this alternative is eliminated from further analysis in this EIR.

### 5.4.5.2 Relocation to Between 4th Street and Mission Avenue

This alternative would include the relocation of the existing transit center to the space bordered by Mission Avenue, Hetherton Street, 4th Street, and the SMART. This concept would require the closure of 5th Avenue between Tamalpais Avenue and Hetherton Street to vehicle traffic. The alternative would also require dedication of East Tamalpais Avenue between 3rd Street and 5th Avenue. Under this alternative, 5th Avenue would be closed to vehicle traffic between Tamalpais Avenue and Hetherton Street to allow room for the new bus bays, requiring vehicle traffic to shift to other routes. A total of 20 bus bays would be provided, including two curbside bus bays on the east side of Tamalpais Avenue south of Mission Avenue and four curbside bus bays on the west side of Hetherton Street north of 5th Avenue. This alternative would include two driveways for buses to enter and exit the facility.

Transit users moving from some of the facility's bus bays would be required to cross 4th Street using a mid-block crosswalk to access the SMART platform. Additionally, there would be a limited number of bus routes that could be located on Tamalpais Avenue, across the SMART tracks from the

rest of the transit center. Transit users transferring from these bus routes to the main facility would be required to cross the SMART tracks to access the main transit center. The Puerto Suello bicycle path could be relocated to run adjacent to the SMART tracks, which would reduce conflicts across the path, eliminating its current crossing of 5th Avenue. This would also allow for bicycle parking adjacent to the bicycle path. Bicycles on the path would be able to cross 4th Avenue at the queue cutter signal or at Tamalpais Avenue to access the planned Tamalpais Avenue bicycle route.

This alternative meets the project objectives of providing improved transit connectivity, ease of use in and around Downtown San Rafael, and convenient, pedestrian connections to surrounding land uses. The transit center would be proximally located to the 4th Street corridor, which is home to San Rafael's central Downtown district. This alternative would enhance local and regional transit use by bringing together multiple modes of the transportation network—including the SMART-bus connection—into a hub that affords transit users the safest, most efficient means of using bus and rail services. As discussed, this alternative would also create a more accessible transit facility for all users by reducing the vehicular, rail, bicycle, and pedestrian conflicts associated with having a busy street intersect the transit center.

This alternative would not achieve the project objective of implementing a cost-effective facility, as the land acquisition required for this alternative would result in additional project cost and would displace numerous residences and businesses, resulting in additional impacts on population and housing. Additionally, the closure of 5th Avenue to vehicle traffic between Tamalpais Avenue and Hetherton Street was deemed infeasible by the City, due to the resulting traffic impacts. For the reasons discussed above, this alternative is eliminated from further analysis in this EIR.

#### 5.4.5.3 Relocation to South of Francisco Boulevard West

This alternative would include the relocation of the existing transit center to a site between Lincoln Avenue, 2nd Street, Francisco Boulevard West, and Irwin Street. This concept would relocate the transit center's bus services, shifting them to the south of the existing transit center. The alternative would require acquisition of parcels along Francisco Boulevard West and would require conversion of a portion of the parking lot of the Sprouts and Staples shopping center. Transit users transferring between the facility's bus bays and the SMART station would be required to travel south across 3rd Street, 2nd Street, and Francisco Boulevard West.

This alternative would not meet the project objectives of providing improved transit connectivity, ease of use in and around Downtown San Rafael, and convenient, pedestrian connections to surrounding land uses. The transit center would be farther than the existing facility from the 4th Street corridor, which is home to San Rafael's central Downtown district. This alternative is also separated from the SMART station, making transfers between bus lines and SMART less convenient.

This alternative would not achieve the project objective of implementing a cost-effective facility, as this alternative would result in out-of-direction travel for nearly all bus routes, adding substantial delay for buses and congestion to nearby roadways. It would be outside of Downtown San Rafael, which is the origin and destination for many users of the transit center, making it inconvenient for many users. For the reasons discussed, this alternative is eliminated from further analysis in the EIR.

#### 5.4.5.4 Across the Freeway

This concept is bounded by 5th Avenue to the north, Irwin and Hetherton Streets to the east, 3rd Street to the south, and Tamalpais Avenue to the west. This alternative could include a three-bay

transit island on Hetherton Street between 3rd and 4th Streets, and or could shift Hetherton Street to the west to allow for on-street bays on the east side of Hetherton Street between 3rd and 4th Streets. This concept incorporates the area underneath US-101, which would eliminate some existing Caltrans park-and-ride lot parking stalls and require covering Irwin Creek (a tributary of San Rafael Creek), across a portion of the block.

This alternative would not meet the project objective of improved transit connectivity and ease of use, the objective of bringing together multiple modes of the transportation network—including the SMART-bus connection, or the objective of reducing vehicular, rail, bicycle, and pedestrian conflicts and improving safety. Multiple bus platforms would be located under the freeway and would require transit users to cross Hetherton Street in order to reach the SMART station. Shifting Hetherton Street to the west would increase project costs and result in additional impacts on transportation. This alternative would also have additional impacts on biological resources due to covering Irwin Creek. For the reasons discussed, this alternative is eliminated from further analysis in the EIR.

#### 5.4.5.5 North of 4th Street and Under the Freeway

This concept would occupy the entire block bounded by 5th Avenue to the north, Irwin Street to the east, 4th Street to the South, and Hetherton Street to the west. It is generally located beneath US-101, would eliminate some existing parking stalls in the Caltrans park-and-ride lot, and require covering Irwin Creek (a tributary of San Rafael Creek) across the full length of the block. While this concept could accommodate 17 bus bays within this block, site circulation would be limited, affecting bus operations, and it would require customer service, restrooms, and pick-up/drop-off functions to be located off site.

This alternative would not meet the project objective of improved transit connectivity and ease of use, the objective of bringing together multiple modes of the transportation network—including the SMART-bus connection, or the objective of reducing vehicular, rail, bicycle, and pedestrian conflicts and improving safety. The separation between this alternative and the SMART Station would require users to cross 4th Street and Hetherton Street to reach the SMART Station and pick-up/drop-off areas. Additionally, this alternative would not meet the project objectives of a secure, safe, and inviting space for transit patrons and improving transit desirability due to the lack of customer service space and restroom facilities. This alternative would not achieve the objective of efficiently accommodating transit services because it would limit site circulation for buses. This alternative would also have additional impacts on biological resources due to covering Irwin Creek. For the reasons discussed, this alternative is eliminated from further analysis in the EIR.

#### 5.4.5.6 Existing Transit Center Plus Citibank Site

This alternative would use the eastern portion of the existing transit center and the Citibank site at the corner of Hetherton Street and 3rd Street. In this configuration, driveways would be located on 2nd, 3rd, and 4th Streets. A total of 17 bus bays would be provided. This alternative would provide two locations (one on each side of 3rd Street) for customer service or security space, with a total of 1,873 square feet of space provided. Four curbside bus bays would be located on Hetherton Street between 2nd Street and 3rd Street to accommodate routes coming to and from US-101. This alternative could include an overhead pedestrian crossing across 3rd Street to provide a grade-separated pedestrian connection between the two portions of the transit center, or the alternative could be implemented without the overhead pedestrian crossing and pedestrian activity shifted to the signalized crossing of 3rd Street at Hetherton Street.

This alternative would result in pedestrian safety and congestion concerns due to its location relative to existing congestion points, particularly related to driveways on congested roadways and the pedestrian crossing at 3rd Street. Therefore, this alternative would not meet the project objective of reducing vehicular, rail, bicycle, and pedestrian conflicts and improving safety. It would also fail to meet the project objective of efficiently accommodating transit users and services. For the reasons discussed, this alternative is eliminated from further analysis in the EIR.