



November 29, 2022

Chair Previtali and Members of the Planning Commission,

We at the Marin County Bicycle Coalition and WTB-TAM are excited to see the Northgate Mall Redevelopment Project continuing apace. This project represents an excellent opportunity to revive a struggling mall and welcome more neighbors to Marin at the same time. As we know all too well, Marin's housing shortage forces many people employed here to live outside our county, forcing them into long, tiring commutes and putting pressure on US 101 and the Richmond-San Rafael Bridge. Opening up our county to over a thousand new households, or letting existing residents downsize to a smaller, more walkable community, can have massive benefits.

At the heart of the issue is that the City of San Rafael has a single opportunity to take a nearly-blank slate and develop a truly modern housing project. We urge the City to imagine the needs of the future, not the past, one where people are walking and biking for a large number of trips, and driving is safe and still common, but not required for all travel.

Our comments on the March 14, 2022 site plan are as follows:

## **Pedestrian Network**

### Narrow Sidewalks

The street cross sections in pages 18 through 20 of the Landscape drawings show a 5' sidewalk for all internal pedestrian circulation, outside of the multiuse path. While this does meet the *minimum* standard, it is hardly a comfortable width. When two couples cannot pass one another without walking single file, a sidewalk is too narrow. We all learned this in the early months of the pandemic, that when a lot of people are walking, narrow sidewalks are a pain, especially for those pushing strollers or using mobility devices.

### Large Curb Radii

The site plan shows gentle, sweeping curves at all points where the internal streets meet an external road. Such a configuration, while perhaps sensible on a freeway ramp, has absolutely no place where pedestrians will be common. This configuration will cause drivers to enter the site at higher speeds, rather than being compelled to slow down and enter with caution. By sharpening the corners (reducing the curb radius) pedestrian safety will be enhanced.

### Raised Crosswalks & Traffic Calming

The current plan mentions traffic calming, but nothing is depicted in the site plans we reviewed. We strongly recommend substantial traffic calming be a part of the internal circulation, including but not limited to raising the crosswalks to the level of the sidewalk. While not yet widely employed in Marin, raised crosswalks are broadly used in the rest of the developed world. They

serve to calm traffic and increase yield rates for pedestrians. They have the added benefit of easing travel for wheelchair users and mobility-impaired travelers, who no longer have to use a ramp to enter and leave the street.

### Overwide Automobile Lanes

There is no reason for internal travel lanes to be 11' wide. These streets are intended to be low-volume, low-speed, and not used by transit or heavy trucks. The National Association of City Transportation Officials [recommends no more than 10' of width](#) for urban streets. An 11' per lane configuration will lead to more speeding and increase the exposure for pedestrians crossing through the street.

## **Bicycle Network**

### No Meandering Paths

The current site plan show the multiuse path from Merrydale Road meandering back and forth between Los Ranchitos Road and the Town Square. While this may look pleasing to the eye of a landscape architect, it is a cardinal sin in bicycle planning. No one wants to weave back and forth while riding. Bicyclists want to travel in clear, straight lines, just as do people traveling in automobiles.

### West Side Access

There are no bicycle accommodations for people accessing the site from the west, the driveway south of Kohl's or south of Lot 9. While the Kohl's driveway appears too narrow for 11' lanes and 5' bike lanes, it could accommodate 10' auto lanes and 5' bike lanes. The Lot 9 entrance configuration is even more confusing, apparently providing 19' automobile travel lanes. This is far too wide and will encourage speeding, rather than the careful driving required in a neighborhood such as this.

### Set Back the Shared Use Path Crossings

The point at which the shared use ring path crosses the Merrydale Road driveway and Street B (or "Geiser Street") should be set back from Las Gallinas Road, mirroring the configuration of the crossing immediately to the north at the Rite Aid. By pulling the crossing back from the street, it ensures that drivers will have a clearer view of crossing bicyclists. This is standard practice in bicycle planning.

### Put Bikes Above the Curb

It is disappointing to see that the internal circulation of the project puts all riders into the street with cars, no matter their age or comfort. A better configuration would be remove the Class 2 lanes from the street, narrow the street by 10' and widen the sidewalks to provide multiuse paths on both sides of the street. This would provide a truly all-ages-and-abilities network where grandmothers and grandchildren would feel safe riding from home to the movies, rather than worrying about whether the driver of a four-door pickup truck can actually see a 10-year-old on a bicycle.

## Connection to SMART

Though this is a future project to be developed by the City of San Rafael, the proposed connections to the SMART station are frankly confusing. They show an 8' multiuse path, which is narrower than standard given its lack of a landscape buffer, plus a bike lane below the curb. It would be much simpler to merely continue the SMART pathway to the mall with a 10-12' multiuse path. There's no reason to put bicyclists in the roadway, forcing them into conflict with cars.

## Overabundance of Parking

We are deeply concerned about the massive amount of parking that will characterize this project, under the current plans. Between the 1,402 public spaces and 2,233 resident spaces (a total of 3,635 parking spaces), the full project represents an *increase* of parking over the existing mall by over 700 parking spaces.

## Public Parking vs. Public Park

One of the large revisions between the initial site plan and the 3/14/2022 plan was the expansion of the Town Square from half an acre to roughly one acre. While this seems like a lot, it pales in comparison to the nearly 10 acres of surface automobile parking being provided (setting aside the structured parking entirely). In a place where public green space is at a premium, why provide ten times as much public parking as public park?

## Parking Increases Driving

[Peer reviewed research has demonstrated](#) that, the more parking people have at their home, the more likely they are to drive for most trips. If we are concerned about the traffic impacts of this project, why not provide *less* parking? This would cater to carless and car-light families, and would encourage families moving to the development to bring, at most, one car.

## Parking Minimums No Longer Apply

Thanks to a recently-passed bill, [AB 2097](#), the City of San Rafael's parking mandates do not apply to this project, because it is entirely situated within one half-mile of the Civic Center SMART Station. Given that there are clear benefits to providing less parking than currently proposed, and no legal requirement to provide over 3,000 spaces, we encourage the project team to bring that total down and use the space for greater public amenities. People don't visit places because of the parking, they visit because there's something to do there.

Sincerely,



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