



January 10, 2022

San Rafael Planning Commission  
1400 Fifth Avenue  
San Rafael, CA 94901

**RE: Northgate Town Center EIR Scope**

Honorable Commissioners,  
Sustainable San Rafael welcomes the opportunity to recommend critical items for inclusion in the scope of the environmental analysis of the proposed Northgate Town Square.

We do so from the perspective of the key principles of sustainability: environmental quality, economic vitality, and social equity. We believe that the redevelopment of Northgate offers a generational opportunity to integrate these values into a true town center for North San Rafael, a regional commercial and entertainment destination, and a model of twenty-first century place making.

We consider the following environmental impacts, alternatives, and mitigations essential for a comprehensive EIR and a successful project:

**Aesthetics**

The heart of the proposed development is its namesake “town square.” The draft EIR needs to include an alternative with a central green space scaled and designed to immediately establish the identity of the entire 45-acre site. The site plan of the current proposal clearly frames the potential for such a space at its core, but then fills it with a surface parking lot. Nothing could be more antithetical to a lively, thriving, attractive town center. The EIR must analyze the erosive impact of such parking on the identity of the site and its surroundings, and then offer alternatives and mitigations that instead build a strong sense of place. Such measures include:

- Locating parking under the new buildings (such as the cinema and ‘major 3’ retail) or in structures (such as over the surface lot on the western portion of Northgate Drive).
- Ringing the central open space with lively cafes and restaurants.
- Scaling up the open space to occupy the entire space north of the cinema.
- Framing the green space with a perimeter promenade defined by an alley of trees and planted trellises, buffering the space from any peripheral parking (e.g., to the west).
- Designing the green space for both casual play and frequent performances, then committing to curate and support its activation.
- Most importantly, anchoring the new identity of Northgate and North San Rafael by completing the central square in Phase I.

**Energy and Greenhouse Gas Emissions**

Climate change is the greatest environmental threat we now face, and a project of this scale inherently poses a significant environmental impact. The EIR should assess how the new Northgate meets the objectives of San Rafael’s Climate Action Plan, that is, a 40% reduction of greenhouse gas emissions by 2030 (from 1990 levels) and zero net emissions by 2045. Since

such complex metrics can sometimes be misleading or misused, the EIR should also include the mitigations needed to achieve these goals, which are straightforward:

- All-electric HVAC, water heating, cooking, and other building systems and appliances.
- A commitment to using only fossil-fuel-free electricity to power these and other uses.
- EV charging stations sufficient to meet 2040 levels of use.
- State of the art building insulation and other energy-efficient measures.
- Sufficient solar and battery storage to meet more frequent power outages.
- AC and air filtration in all enclosed spaces sufficient to meet more heat and smoke events, including emergency community use of retail spaces (e.g., the cinema).
- Use of low-GHG building materials and techniques, including paving and roofing.
- Solar arrays and/or high-sequestration trees to cool parking lots and other spaces.
- Sufficient provisions for residential and commercial recycling, especially of organics.

### **Land Use and Planning**

The EIR should analyze the project's fit with all programs and objectives in San Rafael's new General Plan 2040, with particular regard to those addressing aesthetics and place-making, energy and greenhouse gas reduction, equity, housing, and transportation. The project's fit with its immediate land use and planning context will be largely determined by key pathways connecting a highly walkable neighborhood within Northgate to the neighborhoods and other developments surrounding it. These key pedestrian connectors include:

- Completion of the North San Rafael Promenade around Northgate.
- Tree-lined residential connections to El Faisan Drive and Albion Way to the south.
- An extension of the Promenade east along Merrydale to the SMART Station and Civic Center (with a potential Marin Transit bus connection at Las Gallinas).
- A potential new pathway extending north through the parking lot to the Promenade from the existing main mall entry (retaining that portion of the interior mall in alignment with the central square and cinema, and creating a more compelling sense of arrival to the overall project).

### **Population and Housing**

Space for new housing in San Rafael is a limited resource that must be used wisely to support an economically diverse population. The EIR should analyze how the project can produce as much housing as possible within the City's regulations, with an emphasis on on-site affordable workforce housing which is what San Rafael needs the most. The analysis should include:

- The equity advantages of inclusionary units throughout the residential parcels instead of the separate all-affordable parcel proposed (unless there are real benefits to the latter, such as more units, better supportive housing services, or an extended period of affordability, for instance through a long-term leasehold with a non-profit provider).
- Likewise, any ownership housing should include consideration of how ownership could be used to build economic equity for low-and-moderate-income households.

### **Transportation**

Again, the EIR should assess how the project can best create a walkable, bike-friendly, and transit connected neighborhood, which will benefit all the concerns discussed above.

Thank you for your close consideration of this important project.

Sincerely,

William Carney  
President, Sustainable San Rafael