



October 27, 2024

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

**RE: Comments on Northgate FEIR**

Honorable Commissioners and Staff,  
Sustainable San Rafael continues to support the Northgate Town Square project. In addition to transforming a car-dependent shopping mall into a vibrant and walkable town center enlivened by much needed housing, it includes many features supporting a sustainable future.

We also continue to urge that the City require mitigation of what the FEIR finds to be the project's "significant and unavoidable" greenhouse gas impact. This impact is clearly avoidable. The FEIR states that it can be mitigated by eliminating the use of natural gas in the project's small number of restaurants, complementing the electrification already provided throughout the rest of the project.

This straightforward mitigation would avoid the City being forced to make a finding of "overriding considerations," in effect declaring that the flexibility for a few yet-to-built restaurants to cook with gas is more important than meeting the climate emergency in all ways possible.

According to the FEIR, by complying with BAAQMD and State standards, this mitigation would remove both GHG impacts that the report has identified (Impacts GHG 1 & 2). The report states that this is the only way to mitigate these impacts.

With non-polluting induction cooking now used in many restaurants, and preferred by many chefs for its precision control of heat, the developer's statement that this superior cooking technology is "infeasible" cannot be justified. Yet the FEIR fails to provide an objective analysis of this statement.

Again, we want this important project to proceed and to succeed. That can be achieved by eliminating fossil fuels from these few restaurants.

Sincerely,

William Carney,  
Vice President