



November 22, 2024

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San Rafael City Council
1400 Fifth Avenue
San Rafael, CA 94901

RE: Northgate Approvals

Honorable Mayor and Councilmembers,
Sustainable San Rafael continues to support the Northgate Town Square redevelopment. The project showcases many features needed for a sustainable future, and transforms a car-dependent shopping mall into a vibrant and walkable town center enlivened by much-needed housing.

We also continue to urge the City to require mitigation of what the EIR calls the project's "significant and unavoidable" greenhouse gas impact. This impact is clearly avoidable.

The EIR states that both GHG impacts that it identifies (impacts 1 & 2) can be avoided by eliminating natural gas in the project's small number of restaurants--extending the electrification already provided in the rest of the project, and avoiding the expense of new gas lines.

This straightforward mitigation also avoids the City being forced to make a finding of "overriding considerations," in effect declaring that the flexibility for a few restaurants to cook with gas is more important than meeting our urgent climate emergency by every means possible.

We have the means to avoid this nonsensical and embarrassing finding that sends exactly the wrong message to our community, which is dedicated to curbing climate change. With non-polluting induction cooking already used in many restaurants, and preferred by many chefs for its precision control of heat, the EIR's core conclusion that this superior cooking technology is "infeasible" can no longer be justified.

The rationale offered by the EIR that induction cooking is "infeasible" because it might discourage some national drive-by fast-food brands, simply suggests more opportunity for more forward-looking local businesses to thrive.

The further argument that EIR mitigations can only be feasible if they enforce existing codes would make most mitigations pointless or at least redundant.

Finally, the fear that such a mitigation might invite litigation ignores the fact that the recent 9th Circuit ruling on

electrification specifically applies to local ordinances, not to EIR mitigations. Clearly, it would be feasible for this project to proceed without gas.

Sustainable San Rafael therefore recommends that the City Council, in its approval of the project and supporting actions, direct staff to add the mitigation that "natural" gas shall not be used in the project, and to delete the finding of "overriding considerations" related to such use.

We encourage the developer to coordinate with the City to seamlessly remove this significant GHG impact. The City now has the economic development expertise in its Community Development Department to assist the developer in attracting viable tenants with multiple co-benefits, including progressive local and national restaurants that would welcome the benefits of electric induction cooking.

With cinemas, department stores, and drive-by fast food restaurants all on shaky ground nationally, the City needs to work closely with the developer to assure a viable mix of retail tenants throughout Northgate. To that end, we also recommend a condition of approval providing for ongoing close cooperation between the developer and the City during the tenanting process.

It's particularly important to find a cinema to complement the outdoor performances at the Town Square by attracting more people to Northgate. That's an 'experiential retail' model that's worked well at places like the Metreon at Yerba Buena Gardens in San Francisco. A vibrant mixed-use retail core also complements the surrounding housing and community.

Again, we want Northgate to proceed and to succeed--and to stand as a model for vibrant mixed-use and climate-responsible development. That can be achieved by your addition tonight of a mitigation eliminating gas from these few restaurants and by adding a condition of approval that the developer work closely with the City to successfully complete the tenanting of the project.

Thank you for your close consideration.

Sincerely,

William Carney,
Vice President