

**RESPONSE TO COMMENTS DOCUMENT AND
FINAL ENVIRONMENTAL IMPACT REPORT**

NORTHGATE MALL REDEVELOPMENT PROJECT

SAN RAFAEL, CALIFORNIA

SCH# 2021120187



October 2024

This page intentionally left blank

RESPONSE TO COMMENTS DOCUMENT AND FINAL ENVIRONMENTAL IMPACT REPORT

NORTHGATE MALL REDEVELOPMENT PROJECT

SAN RAFAEL, CALIFORNIA

SCH# 2021120187

Submitted to:

City of San Rafael
1400 5th Avenue
San Rafael, California 94901

Prepared by:

LSA
157 Park Place
Pt. Richmond, California 94801
510.236.6810

Project No. CSR2001.03



October 2024

This page intentionally left blank

TABLE OF CONTENTS

TABLE OF CONTENTS	i
FIGURES AND TABLES	ii
LIST OF ABBREVIATIONS AND ACRONYMS	iii
1.0 INTRODUCTION	1-1
1.1 Purpose of the Response to Comments Document	1-1
1.2 Environmental Review Process	1-1
1.3 Document Organization	1-2
2.0 REVISED PROJECT	2-1
2.1 Project Evaluated in the Draft EIR	2-1
2.2 Revised Project	2-3
2.3 Environmental Effects of the Revised Project	2-13
2.4 Project Alternatives	2-35
2.5 Conclusion	2-39
3.0 LIST OF COMMENTERS	3-1
3.1 Organization of Comment Letters and Responses	3-1
3.2 List of Agencies Commenting on the Draft EIR	3-1
3.3 List of Organizations Commenting on the Draft EIR	3-1
3.4 List of Individuals Commenting on the Draft EIR	3-2
3.5 List of Public Hearing commenters on the Draft EIR	3-9
3.6 List of Late Comments on the Draft EIR	3-10
4.0 COMMENTS AND RESPONSES	4-1
Master Responses	4-1
A. State and Regional Agency Responses	4-19
B. Organizations	4-53
C. Individuals	4-551
D. Public Hearing Transcript	4-1173
E. Late Comments	4-1265
5.0 DRAFT EIR TEXT REVISIONS	5-1
 APPENDICES	
A: SUPPLEMENTAL AIR QUALITY ANALYSIS TECHNICAL MEMORANDUM	
B: SAN RAFAEL FIRE DEPARTMENT SUPPLEMENTAL DOCUMENTATION	

FIGURES AND TABLES

FIGURES

Figure 2-1: Revised 2025 Master Plan.....	2-5
Figure 2-2: Revised 2040 Vision Plan.....	2-6
Figure 2-3: Revised Town Square Detail.....	2-7

TABLES

Table 2.A: Proposed Project and Revised Project Comparison	2-4
Table 4.A: Northgate Mall Quarterly Vacancies (2017–2021)	4-7
Table 4.B: Vehicle Volume Comparison at Selected Intersections Between 2015 and 2021	4-10
Table 4.C: Phase 1 Trip Generation Summary with Vacancy Adjustment.....	4-11
Table 4.D: Full Buildout Trip Generation Summary with Vacancy Adjustment	4-11
Table 4.E: Phase 1 Mitigated Construction Emissions for 2025	4-439

LIST OF ABBREVIATIONS AND ACRONYMS

µg/m ³	micrograms per cubic inch
AAQS	ambient air quality standards
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACMs	asbestos-containing materials
ADA	Americans with Disabilities Act
AQ/GHG Technical Report	Air Quality and Greenhouse Gas Emissions Technical Report
BAAQMD	Bay Area Air Quality Management District
BCDC	San Francisco Bay Conservation and Development Commission
BMPs	Best Management Practices
BMR	Below Market Rate
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAP	Climate Change Action Plan
CCAP 2030	Climate Change Action Plan 2030
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CHP	California Highway Patrol
City	City of San Rafael
CMP	Construction Management Program
CNEL	Community Noise Equivalent Level

CO	carbon monoxide
CPUC	California Public Utilities Commission
CSTDM	California Statewide Travel Demand Model
CTC	California Transportation Commission
dB	decibels
dBA	A-weighted decibels
DPM	diesel particulate matter
DRB	Design Review Board
EIR	Environmental Impact Report
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FEMA	Federal Emergency Management Agency
General Plan Final EIR	San Rafael General Plan 2040 Final EIR
GHG	greenhouse gas
GIS	geographic information system
GLA	gross leasable area
HBMS	Hazardous Building Materials Survey
HCD	State Department of Housing and Community Development
HCM	Highway Capacity Manual
HP	horsepower
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
I-580	Interstate 580
in/sec PPV	inches per second of peak particle velocity
ITE	Institute of Transportation Engineers
lbs/day	pounds per day
L _{dn}	day-night average noise level
LED	light-emitting diode
L _{eq}	equivalent continuous sound level
LGVSD	Los Gallinas Valley Sanitary District

LID	Low Impact Development
L _{max}	maximum instantaneous noise level
L _{min}	lowest time-weighted sound level
LOS	level of service
LT	long-term
LUST	leaking underground storage tank
MCL	Marin Conservation League
MCSD	Miller Creek School District
MEI	Maximally Exposed Individual
MMRP	Mitigation Monitoring and Reporting Program
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT CO ₂ e	metric tons of carbon dioxide equivalent
MT CO ₂ e/yr	metric tons of carbon dioxide equivalent per year
MTA	Memorandum of Traffic Assumptions
MTC	Metropolitan Transportation Commission
NAAQS	National Ambient Air Quality Standards
National Register	National Register of Historic Places
NOA	Notice of Availability
NOP	Notice of Preparation
NO _x	nitrous oxides
NPDES	National Pollutant Discharge Elimination System
OPR	Governor's Office of Planning and Research
PCBs	polychlorinated biphenyls
PD	Planned Development
PDA	Priority Development Area
PEIR	Program Environmental Impact Report
PG&E	Pacific Gas & Electric Company
PM ₁₀	particulate matter less than 10 microns in size
PM _{2.5}	particulate matter less than 2.5 microns in size
PRA	Public Records Act
PRC	Public Resources Code

project	Northgate Mall Redevelopment Project, also Northgate Town Square
RGM	Responsible Growth in Marin
RHNA	Regional Housing Needs Assessment
ROGs	reactive organic gases
RTC Document	Response to Comments Document
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RTPA	Regional Transportation Planning Agencies
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
Scoping Plan	2022 Scoping Plan for Achieving Carbon Neutrality
SCP	Stormwater Control Plan
SCS	Sustainable Communities Strategy
SGMP	Soil and Groundwater Management Plan
SMART	Sonoma-Marín Area Rail Transit
SR-37	State Route 37
SRA	State Responsibility Area
SRCS	San Rafael City Schools District
SRFD	San Rafael Fire Department
SRPD	San Rafael Police Department
ST	short-term
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TA Guidelines	City of San Rafael Transportation Analysis Guidelines
TACs	toxic air contaminants
TAM	Transportation Authority of Marin
TAMDM	TAM demand model
TIS	Transportation Impact Study
TOC	Transit-Oriented Communities
TOS	Transportation Operations Study
TPA	Transit Priority Area

US-101	United States Route 101
UST	underground storage tank
VdB	vibration velocity decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMТ	vehicle miles traveled
VOCs	volatile organic compounds
WDR	Waste Discharge Requirement
WSA	Water Supply Assessment
WWTP	wastewater treatment plant

This page intentionally left blank