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October 14, 2019

Raffi Boloyan, Planning Manager
and Planning Commissioners
City of San Rafael
1400 5th Avenue
San Rafael, CA 94901
raffi.boloyan@cityofsanrafael.org

RE: Costco at Northgate Mall

Dear Mr. Boloyan and San Rafael Planning Commissioners:

Marin Conservation League (MCL) has reviewed the Pre-Application and Conceptual Design Review application for the Costco Project at Northgate Mall in San Rafael and has concerns about the proposed project. As you may know, MCL has an 85-year history and legacy of preserving land and protecting natural resources in Marin County. Much of MCL's work today is based on tracking and advocating on local issues, planning processes, and proposed developments that have the potential to create adverse environmental impacts.

The proposed Costco project is large and MCL suspects the accompanying land use changes, especially those related to the proposed gas station, may have potentially significant impacts on the natural environment and on the North San Rafael communities surrounding the proposed project.

We can foresee that the project may have potentially significant impacts in the following areas:

- Geology and soils
- Surface and groundwater hydrology
- Water quality
- Air quality
- Noise
- Greenhouse gas emissions
- Energy conservation
- Hazards and hazardous materials
- Land use and planning
- Population and housing
- Traffic and Transportation
- Public services and Utilities

These topics, and potentially others, should be analyzed at a level of detail adequate for determining potential impacts and mitigation measures. Unless the proposed project clearly qualifies for an exemption from California Environmental Quality Act (CEQA) review, an initial study should be completed to determine the appropriate type of CEQA document to be prepared. Considering the nature of a warehouse store such as a Costco with associated gas pumps, as well as the location of the site where it is proposed, MCL anticipates that an environmental impact report (EIR) would likely be the appropriate document to be prepared.

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As has been the standard practice of the City in the past, we anticipate that project plans and technical studies submitted by the applicant will be made available to the public on the City's website, as well as notices and documents related to the CEQA review for the project.

MCL intends to actively participate in the review of this project as it moves forward. Please include MCL on the mailing list for all future notices regarding public meetings, document availability, etc., in connection with this application.

Thank you. We appreciate the City's diligence in providing the public with an open and thorough environmental review of the proposed Costco project.

Sincerely,



Linda J. Novy
President



Susan Stompe
Chair, MCL's Land Use and Transportation Committee



Kate Powers
MCL Director