

January 13th, 2021



Paul Jensen
Community Development Director
City of San Rafael
1400 Fifth Avenue
San Rafael, CA. 94901

Via email: Paul.Jensen@cityofsanrafael.org

Re: Temporary Use Permit for Canalways RV residence and roadway construction

Dear Paul:

Thank you for the opportunity to comment on the proposed two-year temporary permit at the Canalways property. While MCL does not oppose the temporary RV for an onsite caretaker and is encouraged that the City is continuing to work with property owners to improve maintenance of the property, we have concerns regarding the temporary use permit.

First, using recycled asphalt grindings on the temporary road pose a hazard to the wetlands and waterway. In addition to petroleum-based pollutants, grindings can contain binders, polymers, or other potentially toxic additives from their former use that should not be allowed to runoff into the marsh. Does the property owner have a stormwater runoff plan for the temporary roadway? How will the stormwater be filtered of pollutants before flowing into the Bay? Will that be the property owners' or the City's responsibility to maintain water quality on and leaving the site? For a temporary two-year use, will decomposed granite not suffice to support the continued use of the ATV that seems to be used currently for patrolling the site?

Next, "Place 2" (near the northwest corner of the Target store) as referenced on page 8 of the permit application as an alternative site for the RV should be denied by the City. The location is in close proximity to the wetland, the ponding area, and the channelized creek that flows along the southern border of the site.

At a recent San Rafael Planning Commission meeting where the Canalways site was discussed, it was mentioned that a study of biological resources on the 85-acre site has not been conducted in decades and that that information should be updated. If negative impacts to the site that may result from activities proposed in the temporary use permit are either not prevented, or evaluated and mitigated, the biological resources will likely be impoverished and degraded before future biological studies take place.

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Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

With the effects of climate change accelerating, including large storm events, rising sea levels and associated rising groundwater, increased diligence in protecting creeks and baylands from pollutants in runoff and from erosion is required. We encourage San Rafael to adopt a Sustainable Streets approach to transportation infrastructure improvements.

Thank you for the City's consideration of these concerns.

Sincerely,



Robert Miller
President



Kate Powers
Board member