

August 25, 2015

San Rafael Planning Commission
c/o City of San Rafael Community Development Department
PO Box 151560
San Rafael, CA 94915



Protecting Marin Since 1934

Re: San Rafael Corporate Center projects | 755 Lindaro Street and 788 Lincoln Avenue

Dear Commissioners:

Marin Conservation League (MCL) appreciates the opportunity to review and comment on the Initial Study/ Mitigated Negative Declaration for the proposed project and development at the San Rafael Corporate Center. MCL has been active for more than 80 years in preserving, protecting, and enhancing Marin's natural assets. Our concerns include protecting the quality of the urban environment as well as that of the natural world.

We urge that you **not** adopt the Mitigated Negative Declaration **until** it more adequately addresses the following items.

1. The Negative Declaration does not adequately address the potential impacts from constructing and anchoring the auger grouted displacement piles into the capped contaminated site at 755 Lindaro. Nor does it address the hazards from disruption of the remediated, yet still hazardous soil at the Lincoln Parking Garage 2 site. The Negative Declaration should specify the procedures that will be used to manage contaminants and provide specifics about mitigation during and after construction, according to the 2008 Soil Management Work Plan Addendum for the project. The Addendum with specific passage references should be attached to the Negative Declaration.
2. The San Rafael Corporate Center campus, including the buildings currently under construction in addition to the two proposed buildings in the project, block views of surrounding hills and ridgelines. While the campus is not within an area that is officially designated as visually significant or a scenic corridor, the beauty of the landscape that forms a backdrop to central San Rafael is significantly blocked by the height and bulk of the structures. Mitigation should be required. One possible mitigation that would reduce the bulk of building expanses would be to specify species of street trees in the landscaping that are tall and have wide canopies to break up the long building envelopes with shade and green foliage.
3. Although the site at 785 Lincoln has the minimum setback allowed, 25 feet from Mahon Creek, and the creek does not flow across the site boundary, the site is part of the Mahon Creek watershed and it, and the other building sites on the campus, should actively integrate the tidally influenced creek corridor into its urban-like environment through

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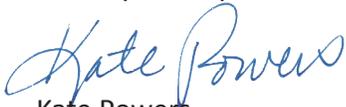
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restoration and enhancement, making it an enjoyable border along the campus for human interaction and community gathering, as well as a healthier space for other species. Fences currently run the length between Lincoln and Lindaro on the campus, separating the creek from both the Corporate Center and the multiuse pathway that runs along the opposite bank. Both Mahon Creek Park at the south edge of the site and the multiuse path would benefit from creek access. Focus on the creek watershed would make an attractive public-private amenity for San Rafael and BioMarin.

4. Finally, we urge that ongoing data and results from the Mitigation Monitoring and Reporting Program be made available to the public on a regular schedule.

Thank you for your consideration.



Kate Powers

President, Marin Conservation League