SECOND MEMORANDUM

TO: Marin County Planning Commission

FROM: Tom Lai

RE: October 30, 2017 Special Planning Commission Hearing Item 4
North Coast Land Holdings Master Plan Extension and
Riley Hurd Appeal of a Notice of Preparation of EIR

DATE: October 27, 2017

Attached are additional correspondence received with regard to the above-referenced item since distribution of the staff report and the first memorandum dated October 26, 2017.

Attachments: 1. Riley Hurd Letter (10/26/17)
2. Department of Transportation Letter (10/26/17)
3. Housing Crisis Action Group Letter (10/27/17)
4. Southern Marin Lacrosse Club Email (10/26/17)
5. Bill Lampl Email (10/26/17)
6. Barbara Rowe Email (10/27/17)
7. Bruce Corcoran Letter (10/27/17)
October 26, 2017

Via E-Mail Only

Planning Commission
County of Marin
3501 Civic Center Drive, Suite #308
San Rafael, CA 94903

Re: Update to Appeal – TRAFFIC STUDY

Dear Members of the Planning Commission:

Our office continues to represent the Seminary Neighborhood Association. This letter is a brief update to our appeal of the County’s decision to proceed with an EIR instead of going straight to a denial hearing for the unapprovable NCLH project at the Seminary site. The major underlying concern of the community about the development of this site has always been one thing: traffic. While the crux of the appeal remains the fact that the Strawberry Community Plan does not, and would not, permit the proposed project; the traffic that would result from the current proposal also mandates immediate denial.

Throughout the hearings on this matter, we have referenced various levels of traffic impact from the many different project iterations based on high-level analyses from our traffic engineer. Never once have any of these numbers been in the realm of what the community’s infrastructure can accept. The current version of the project is no different.

Attached as Exhibit A is a trip generation analysis for both the current project, and the applicant’s proposed CEQA alternative. The numbers are nothing short of staggering. Even using rather conservative trip rates (other localities use significantly higher numbers), both scenarios generate over 7,000 new trips per day. As a reminder, there are currently no permitted uses occurring at the site, and therefore the CEQA baseline for comparison is zero. (Communities for a Better Environment v. South Coast Air Quality Mgmt. Dist., (2010) 48 Cal.4th 310, 320.) That being said, one of the most instructive data points in the attached report is the following portion:
"The daily over 7,000 trips that would be generated by the proposed project alternatives compare with the trip generation of 1,470 daily trips counted for a full week in March 2010 on all five driveways that served the Golden Gate Baptist Theological Seminary when it was in full operation. This would be an increase of over 5,500 daily trips - almost a five-fold increase."

There are actual counts from the Seminary’s time of operation in 2010, and this project creates five-times the amount of traffic. The numbers are so far beyond the former operation of the Seminary, that there is simply no Traffic Demand Management Plan or other supposed trip reduction techniques that would ever bring the trip counts for a project of this size to an acceptable, or approvable, level. The Tiburon Wye and its surrounding intersections have already been studied ad infinitum. Further study will not somehow render these already impacted and failing intersections capable of accepting anything close to the level of traffic this project would create.

As noted in the staff report, this property is supposed to be zoned RMP 2.1 if the self-contained seminary is no longer in operation, which it obviously is not. This zoning would yield a maximum of 220 units for the site, which results in a trip generation of 1,760 trips per day (8 trips per unit). Even at RMP 2.47, which would yield a maximum of 258 units for the site, there are 2,064 trips generated per day. What this hypothetical mathematical exercise demonstrates is just how out of scale the current proposal is for the site at 7,617 trips. The project’s numbers are so extreme as to render the application unapprovable on its face, thereby implicating CEQA Guideline 15270, and the need to deny the project without costly and time-consuming environmental review.

We hope these additional data points assist the Commission in rendering its decision on the appeal. Thank you.

Very Truly Yours,

Riley F. Hurd III

CC: Seminary Neighborhood Association
    Strawberry Community Association
    Supervisor Kathrin Sears
    Brian Crawford
    Tom Lai
    Dan Sicular
MEMORANDUM

To: Seminary Neighborhood Association
From: Bob Harrison
Date: October 26, 2017
Re: Trip Generation for Proposed Seminary Site Land Uses

The trip generation data is presented in the table below for the Proposed Project, Scenario A, and the CEQA Alternative, Scenario B, on a weekday when there is an event scheduled at the theater. The trip rates are based on research conducted by the San Diego Association of Governments (SANDAG) Trip Generators and the Institute of Transportation Engineers (ITE) Trip Generation Manual. Trips rates include resident, employee, visitor and delivery trips.

<table>
<thead>
<tr>
<th>Seminary Site Land Use</th>
<th>Weekday Trip Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Proposed Project</strong></td>
<td></td>
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<tr>
<td>Multi-family housing</td>
<td>Dwellings</td>
</tr>
<tr>
<td>Single-family housing</td>
<td>Dwellings</td>
</tr>
<tr>
<td>Office – 20 employees</td>
<td>Sq. Ft.</td>
</tr>
<tr>
<td>Academic Institution University</td>
<td>Students</td>
</tr>
<tr>
<td>Preschool</td>
<td>Sq. Ft.</td>
</tr>
<tr>
<td>Gymnasium/Fields</td>
<td>Sq. Ft.</td>
</tr>
<tr>
<td>Auditorium/Theater</td>
<td>Seats</td>
</tr>
<tr>
<td><strong>Total Trips Proposed Project -- Scenario A</strong></td>
<td>7,617</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CEQA Alternative</th>
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<tr>
<td>Multi-family housing</td>
<td>Dwellings</td>
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<tr>
<td>Single-family housing</td>
<td>Dwellings</td>
</tr>
<tr>
<td>CCRC - Continuing Care Retirement Community</td>
<td>Dwellings</td>
</tr>
<tr>
<td>Office – 20 employees</td>
<td>Sq. Ft.</td>
</tr>
<tr>
<td>Academic Institution University</td>
<td>Students</td>
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<td>Preschool</td>
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<tr>
<td>Auditorium/Theater</td>
<td>Seats</td>
</tr>
<tr>
<td><strong>Total Trips CEQA Alternative -- Scenario B</strong></td>
<td>7,129</td>
</tr>
</tbody>
</table>

The daily over 7,000 trips that would be generated by the proposed project alternatives compare with the trip generation of 1,470 daily trips counted for a full week in March 2010 on all five driveways that served the Golden Gate Baptist Theological Seminary when it was in full operation. This would be an increase of over 5,500 daily trips – almost a five-fold increase.
October 26, 2017

Mr. Tom Lai  
County of Marin  
Community Development Agency  
3501 Civic Center Drive, Suite 308  
San Rafael, CA 94903

North Coast Landings LLC Community Plan Amendment and Master Plan Amendment (Golden Gate Baptist Theological Seminary) – Notice of Preparation (NOP)

Dear Mr. Lai:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission’s (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans’ Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the NOP. Please reference Caltrans previous comment letters dated November 17, 2015, October 26, 2016, and September 14, 2017 letters as these comments still apply. Additional comments may be forthcoming pending final review.

Project Understanding

The project applicant, North Coast Land Holdings, LLC, proposes to redevelop the existing Golden Baptist Theology Seminary campus (Seminary). Specifically, the applicant proposes to expand and develop the existing academic and residential areas, preserve additional open space, and replace the Seminary with another academic end-user, which may or may not have a religious component that will accommodate approximately 1,000 students.

The project will replace 198 of the 211 existing residential units and retain thirteen of the existing units, perform architectural and interior remodeling of the existing Library and Cafeteria Buildings, remodel and expand the Administration Building by 12,000 square feet (sf) and the Maintenance Building by 3,000 sf. The applicant proposes to construct a 25,000 sf Chapel/Auditorium, 20,000 sf Gymnasium/Health Center, 12,000 sf Student Center, and 93 new residential units resulting in 304 net new residential units. These units will consist of 55 studios, 75 one-bedroom, 55 two-bedrooms, 106 three-bedrooms, and two four-bedrooms.

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Mr. Tom Lai, County of Marin  
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The applicant proposes a Transportation Management Plan with measures that are intended to reduce potential traffic and parking impacts to the surrounding area, including a proposed school bus program that will be the primary mode of access for the students.

Primary vehicular access for the project site would be gained via Seminary Drive at its intersections with Gilbert Drive and Hodges Drive from the US 101 on- and off-ramps at Redwood Highway Frontage Road. Regional access for the project site would be gained via nearby State facilities, including US 101 and State Route (SR) 131/Tiburon Boulevard. Bicycle and pedestrian access would be gained via the pedestrian overcrossing just north of the US 101 on- and off-ramps at Redwood Highway Frontage Road.

The proposed project seeks the following authorizations from the County of Marin:

- Amendment to the Strawberry Community Plan to change the exclusivity of student housing to residential units not solely dedicated to students.
- Amendment to the 1984 Master Plan allowing the previously approved student housing to be redeveloped as market rate housing.
- Design Review to permit site layout, architectural design, and construction of the new buildings.
- Master Use Permit to allow multiple conditional uses onsite in addition to the graduate school, including the following: (1) on-site property management offices; (2) a pre-school open to the public; and (3) a catering company that provides service either on-or off-site.
- Vesting Tentative Map to subdivide Lot 28 of the Seminary Ridge subdivision into six lots.
- Tree Removal Permit to allow the removal of protected trees for development of the project.

**Operations Analysis**

Please address our concerns in the November 17, 2015 Caltrans comment letter referenced below and incorporate them into the final Traffic Impact Analysis (TIA). Please provide a copy of the final TIA to Caltrans for review.

- The intersection of East Strawberry Drive/Bay Vista Drive/SR 131 should be analyzed to determine whether the existing left-turn lane can accommodate project-induced traffic volumes from westbound SR 131 to East Strawberry Drive/Bay Vista Drive;
- Please provide existing traffic data with date(s) of collection for study locations 5, 6, 15 and 16 as referenced in the TIA on pages 3-4. In addition, please submit the projected project traffic for all study scenarios and indicate the percent traffic growth that was used. Initial review of the TIA indicates understated existing traffic data compared to the State traffic database;
- Please provide the detailed analysis of study area intersections 5, 6, 15 and 16 including the existing plus project scenarios;
- Please provide support documentation identifying the assumptions and analytical methodology for the assumption that all project-generated traffic flowing from U.S. 101

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(northbound (NB) and southbound (SB)) will be using study intersections 5 and 6;

- What are the project-related impacts to U.S. 101 between the Richardson Bridge and north of SR 131? Are the end of queue(s) at the off-ramp(s) anticipated to extend to the mainline? Please support the response with applicable supporting documentation; and

- Please provide Caltrans with the Transportation Management Plan (TMP) referenced in Goal 3 - Reduction of Vehicle-Generated Pollutants (Attachment to Environmental Review Application, p. 24). The TIA does not adequately outline demand management strategies planned in order to ensure the expanded campus for the proposed Branson School generates “the same or fewer vehicle trips than a university/college of 1,000 students as approved in the Master Plan.” Verification is needed to support the Branson School’s commitment to limiting traffic.

Cultural Resources
The project area is sensitive for prehistoric archaeological resources. As part of the environmental review for this project, we recommend that Marin County conduct a cultural resource technical study that at a minimum includes a records search at the Northwest Information Center of the California Historical Resources Information System (CHRIS), as well as a field survey of the project area by a qualified archaeologist and qualified architectural historian.

Additionally, per California Environmental Quality Act (CEQA) and Assembly Bill (AB) 52, we recommend that Marin County conduct Native American consultation with tribes, groups, and individuals who are interested in the project area and may have knowledge of Tribal Cultural Resources or other sacred sites.

If an encroachment permit is needed for work within Caltrans right-of-way (ROW), we may require that cultural resource technical studies be prepared in compliance with CEQA, Public Resources Code (PRC) 5024, and the Caltrans Standard Environmental Reference (SER) Chapter 2 (http://www.dot.ca.gov/ser/vol2/vol2.htm). Should ground-disturbing activities take place within Caltrans ROW and there is an inadvertent archaeological or burial discovery, in compliance with CEQA, PRC 5024.5, and the SER, all construction within 60 feet of the find shall cease and the Caltrans District 4 Office of Cultural Resource Studies (OCRS) shall be immediately contacted at (510) 622-1673.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development. Recently approved guidance for incorporating SB 743 (Local Development-Intergovernmental Review Program Interim Guidance, November 2016) intends to ensure that development projects align with State policies through the use of efficient development patterns, innovative travel demand reduction strategies, and necessary multimodal roadway improvements.

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In Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place Type 4 Suburban Communities – Dedicated Use Area**, which includes areas with a low level of integration of housing with jobs, retail service, poorly connected street networks, low levels of transit service, a large amount of surface parking, and inadequate walkability, weak community design and variable regional accessibility. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, please submit a VMT analysis resulting from the proposed project including:

- A vicinity map, regional location map, and site plan clearly showing the project’s location in relation to the STN. Clearly identify State ROW, bicycle paths, and transit facilities within the study area.
- A VMT analysis pursuant to the County's guidelines or, if the County has no guidelines, the Office of Planning and Research’s Draft Guidelines. Projects that result in automobile VMT per capita greater than 15 percent below existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies—such as Caltrans—are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the County.
- Potential safety issues for all road users should be identified and fully mitigated.
- The project’s primary and secondary effects on pedestrians, bicycles, disabled travelers and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

**Vehicle Trip Reduction**

Given the intensification of use and the opportunities to reduce VMT, we encourage the County to establish a Transportation Management Association (TMA) in partnership with other developments in the area to pursue aggressive trip reduction targets with Lead Agency monitoring and enforcement. In addition, the Transportation Demand Management (TDM) elements described below should be included in the program to promote smart mobility and reduce regional VMT and traffic impacts to the STN:

- Project design to encourage walking, bicycling, and convenient transit access;
- Ten percent vehicle parking reduction;
- Commuter subsidy for transit, carpool, and vanpool for students, patrons, and employees on an ongoing basis;
- Onsite TDM coordination;
- Secured bicycle storage facilities;
- Bicycles for employees to access nearby destinations;
- Showers, changing rooms and clothing lockers;
- Bicycle route mapping resources and bicycle parking incentives;
Mr. Tom Lai, County of Marin  
October 26, 2017  
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- Transit and trip planning resources such as commute information kiosk;  
- Enhanced bus stops including bus shelters;  
- Electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles;  
- Carpooling incentives, dedicated parking spaces and guaranteed ride home for carpooling employees;  
- Bicycle share membership;  
- Secured bicycle storage facilities;  
- Fix-it bicycle repair station(s); and  
- Decrease headway times and improve way-finding for Marin Transit and Golden Gate Transit bus routes to provide a better connection between the project, the nearby Seminary Drive Bus on US 101 Pad, the future Larkspur Sonoma-Marin Area Rail Transit (SMART) Station, and regional destinations.

Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing the parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on US 101, SR 131, and other State facilities. These smart growth approaches are consistent with the Metropolitan Transportation Commission’s Regional Transportation Plan and Sustainable Communities Strategy goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to Chapter 8 of Federal Highway Administration’s *Integrating Demand Management into the Transportation Planning Process: A Desk Reference*, regarding TDM at the local planning level. The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

For information about parking ratios, please see MTC’s report, Reforming Parking Policies to Support Smart Growth, or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking.

**Multimodal Planning**

The project should be conditioned to ensure connections to existing bike lanes and multi-use trails to facilitate walking and biking to nearby jobs and neighborhood services. Therefore, the proposed project should be conditioned to connect to both the existing Class II and proposed Class III bike lanes on Seminary Drive as shown in the 2008 Marin County Unincorporated Area Bicycle and Pedestrian Master Plan. Please consider reducing headway times to promote usage of nearby Marin Transit Bus Routes 17, 22, 36, 71X, 219 and Golden Gate Transit Bus Routes 8, 18, 24, 27, 30, and 70. Providing these alternative transportation modes will reduce VMT.

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Sea Level Rise

The effects of sea level rise may have impacts on transportation facilities located in the project area. Executive Order (EO) S-13-08 directs State agencies planning construction projects in areas vulnerable to sea level rise to begin planning for potential impacts by considering a range of sea level rise scenarios for the years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect material durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect soil pore pressure at dikes and levees on which transportation facilities are constructed. All these factors must be addressed through geotechnical and hydrological studies conducted in coordination with Caltrans.

Travel Demand Fees

Given the potential increase in VMT and proximity to US 101 and State Route 131, the project should be conditioned to contribute fair share impact fees toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. These contributions would be used to lessen future traffic congestion and improve multimodal transportation facilities in the project vicinity. Caltrans strongly supports measures to increase sustainable mode shares, thereby reducing VMT. The fair share information should also be presented in the Mitigation Monitoring and Reporting Plan of the Final Environmental Impact Report. Required roadway improvements should be completed prior to the issuance of the Certificate of Occupancy.

Transportation Permit

Project work that requires movement of oversized or excessive load vehicles on the STN requires a transportation permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to: Caltrans Transportation Permits Office, 1823 14th Street, Sacramento, CA 95811-7119. See the following website for more information: http://www.dot.ca.gov/hq/traffops/permits.

Encroachment Permit

The applicant will be required to apply for and obtain an encroachment permit for any work within Caltrans ROW prior to construction. As part of the encroachment permit process, the applicant must provide the appropriate California Environmental Quality Act approval, where applicable, for potential environmental impacts within the ROW. The applicant is responsible for quantifying the environmental impacts of the improvements within Caltrans ROW (project-level analysis) and completing appropriate avoidance, minimization and mitigation measures.

To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the
encroachment permit process. See the website link below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits.

Should you have any questions regarding this letter, please contact Stephen Conteh at (510) 286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse
October 27, 2017

Re: 1984 Master Plan for the former Golden Gate Theological Seminary

Dear Marin County Planning Commission,

We are writing for the Housing Crisis Action Group (HCAG), a coalition of diverse organizations working to tackle the housing crisis in Marin County. We are a group of business leaders, city planners, union workers, environmental advocates, public servants, and educators, living and working in Marin. We strongly **endorse Option A** for the 1984 Master Plan for the former Golden Gate Theological Seminary.

Marin County’s housing production has not kept pace with job growth or our aging demographics. Due to a lack of housing supply, people who work in Marin cannot afford to live here. As affordability is impacted, people have longer commutes thereby leading their quality of life to deteriorate, limiting their ability to participate in their communities, and air and water quality to suffer. Our mission is to create, build, and preserve much-needed housing in Marin County.

By extending the 1984 Master Plan for the former Golden Gate Theological Seminary for four additional years, we can allow sufficient time to conduct environmental review and review of the merits of the pending application to redevelop the property consistent with the Master Plan. This is a better option for Marin—it gives us a chance to address the housing supply and affordability shortage in Marin and make it a better place to live.

We **support Option A** and urge you to do the same for the following reasons:

1. Section 22.70.050 B.3 states that the Director *may make minor* modifications to the project. There is no mandate in the Code to change the Master Plan at this time. The Commission and the Board of Supervisors have full authority to retain the Master Plan’s current number of 304 units.

2. The proposed **Option B** changes are *not minor* as they result in a loss of over 15% of homes before review of the project has commenced. Over 46 potential homes and 9 affordable units would be lost. This is comparable to the size of the recently completed Oma Village in Novato or the recently-approved Victory Village in Fairfax. Before reducing the number of units, the Commission should consider the merits and impacts of the project.

3. The housing crisis makes it critical that the Commission maintains the unit count at least until it has the chance to consider the merits and impacts of the project.

We support creating and preserving housing to help younger people find a room to live in Marin, help people in the working class find a place closer to work, and enhance the ability of our older residents to age-in-community. We **endorse Option A** as the proposed changes are not minor—the loss of significant housing is not warranted. We believe in the imperative for housing in Marin and urge you **support Option A** to ensure Marin is a great place to live for everyone.

Sincerely,

Diana Conti  
Southern Marin Activist

Linda Jackson  
Marin Environmental Housing Collaborative

Cynthia Murray  
North Bay Leadership Council

Kris Organ  
California Alliance for Retired Americans

Robert Pendoley  
Marin Environmental Housing Collaborative
To: Marin County Planning Commission
Subject: Support of North Coast Land Holdings
Attention: Tom Lai, Assistant Director of Planning

Dear Tom,

- The Southern Marin Lacrosse has been using the Seminary property for many years and has benefitted thousands of local children.
- We believe in the new ownership and the vision being pursued by the applicant and have experienced first-hand the outreach that the applicant has engaged in with the community. Southern Marin Lacrosse Club knows first-hand that the new owners of the Seminary property are dedicated to the betterment of the community, especially young families in Southern Marin.
- We see the potential for an exciting, thoughtful, forward thinking project that could potentially be a great benefit to the community as it integrates recreational uses, housing, learning, and preserves large amounts of open space.
- Extending the Master Plan guarantees an on-going community presence on the site, as was approved over three decades ago.
- While we understand that neighbors have raised concerns about the impacts on traffic congestion in the area, we believe that following the County staff’s recommendation to proceed with studying the traffic and other impacts of the proposed development in a careful and thorough way is the only basis on which a sensible judgment as to the project itself can be reached. Rejecting the project now without careful study will deprive the County of desperately needed community benefits that this project could offer.
- Southern Marin Lacrosse is also opposed to any attempt to delay or otherwise hinder the application and believe the County should move forward, as recommended by County staff, with properly evaluating the application through the prescribed planning process.

Please feel free to contact us with any questions.

Thank you,

The Southern Marin Lacrosse Club
southernmarinlacrosse@gmail.com
415.713.7473
Dear Tom,
I am familiar with the Seminary property and have met with the new ownership and agrees with their vision to convert the site into a forward-thinking site that integrates workforce housing, learning, recreational uses and open space.

I am also aware of the housing crisis in Marin and how that has severe effects, especially on teachers and school staff members in our school district. This project may be an opportunity to address that need head on by creating high quality housing for people that need it the most.

The new ownership of the property is already getting actively engaged with the community and has become a supporter of Kiddo! and its mission to improve the quality of our local schools.

Sincerely,
Bill Lampl
Executive Director
Kiddo!, Mill Valley Schools Community Foundation

Get Outlook for iOS
Tom,
I sent the following email through the website to the Planning Commission members. Here is copy for you:

Board Members Curran, Dickenson, Paoli, Biehle, Eller, Dresser and Theran,
Thank you for serving on the Planning Commission. I am a 41 year resident of Strawberry and retired pastor (21 years) of Westminster Presbyterian Church in Tiburon. I am very concerned about the lack of affordable housing in Marin made even more critical following the recent fires. I ask you to CHOOSE OPTION A and approve the extension of the 1984 Master Plan for the former Golden Gate Baptist Theological Seminary so there is no loss of housing. The Commission and the BoS have full authority to retain the Master Plan's current number of 304 units (20% = 61 affordable units). I urge you to choose Option A, extend the Master Plan without added conditions. Please do the environmental review and merit review before any changes are considered. Thank you!

Barbara Rowe
100 Ricardo Road, Mill Valley (Strawberry)
415-383-8006
October 27, 2017

HAND DELIVERED AND DELIVERED VIA E-MAIL

Marin County Planning Commission
Mr. Tom Lai, Assistant Director, Community Development Agency
Ms. Rachel Reid, Environmental Planning Manager
3501 Civic Center Drive
San Rafael, CA 94903

RE: North Coast Land Holdings Master Plan Extension and Riley Hurd Appeal of the Notice of Preparation of Environmental Impact Report for North Coast Land Holdings Community Plan Amendment, Master Plan Amendment, Design Review, Master Use Permit, Tentative Map, Tree Removal Permit (Project ID P1490)

Uphold the Riley Hurd Appeal and Rescind the NOP

Dear Commissioners:

On behalf of concerned citizens of Strawberry, we respectfully ask the Planning Commission to uphold the Riley Hurd Appeal and to rescind the Notice for Preparation of an Environmental Impact Report (NOP) because the Community Development Agency’s (CDA’s) description of North Coast Land Holdings (NCLH’s) project in the NOP is different from NCLH’s description of the project in the application. In addition, CDA’s description of the project is inconsistent with the description in the supporting documents provided by NCLH in the application.

The NOP states that the project would “replace the existing* Seminary graduate school with a different kind of graduate school, which may or may not have a religious component.” However, NCLH’s Project Description states, “the proposed project will substantially conform with the underlying entitlements and historical operational pattern as a graduate school.” p.1 And, further on, NCLH’s Project Description states, “the proposed Academic Campus would continue the operation of an educational institution, which may or may not include a religious component.” p.6 (*The Seminary graduate school has closed and no longer exists.)
Obviously, these project descriptions are different. CDA confirms a graduate school, but NCLH makes no such commitment. Instead, NCLH proposes a vague, unknown, and unspecified educational institution.

NCLH presented an on-line high school at the open house last summer, and a Member of the Strawberry Design Review Board testified at the October 2, 2017 Meeting that she attended another NCLH presentation about a high school only two weeks earlier. NCLH has led us to believe that the academic component of the proposal will be some type of high school, not a graduate school.

Moreover, CDA’s confirmation of a graduate school is inconsistent with the Traffic Study and the Transportation Management Plan in NCLH’s application because both documents still are describing the environmental impacts of The Branson School, which is a high school that withdrew from the project last January.

Despite these inconsistencies, NCLH continues to propose the same project as last year, except this time without The Branson School and without a specific replacement, which is a major difference. As a result, the application is incomplete. NCLH must update its application by removing references to The Branson School and by identifying the new educational institution before an EIR can be prepared. As it stands now, the NOP allows NCLH to change its application at its whim, which frustrates and impedes analysis by other stakeholders. NCLH’s application is not accurate, stable, and finite. It is an application in search of a viable project.

Marin County Environmental Review Guidelines IV.D.2, Adequacy of Descriptions, states that, “To be found complete, an application must contain sufficient information to permit the determination of impacts of the project.” CDA and NCLH have not met this burden, which is a prerequisite of the review process. The proposed Planning Commission Resolution Denying the Riley Hurd Appeal has it backwards. If CDA claims without rigorous review that the application is complete, thereby setting into motion the NOP, then it is of little consolation to the appellant and other stakeholders that the lead agency can require the applicant to submit in the future additional information needed for environmental evaluation of the project under Section 15060 of the CEQA Guidelines, when, in fact, NCLH’s project never should have been found to be complete in the first place. This is an example of “passing the buck.”

We are struck by the stark contrast between CDA’s intensive analysis of Hart Marin’s proposal and NCLH’s Branson proposal compared to virtually no analysis of NCLH’s current proposal at the same stage of the review process, even though the current proposal has changed significantly, especially because of the new density calculations. NCLH’s Branson proposal elicited detailed comments from CDA, Department of Public Works, Marin Municipal Water District, Southern Marin Fire Protection District, Richardson Bay Sanitation District, and Caltrans,
but NCLH's current proposal has elicited few, if any, detailed comments from any of these agencies. Furthermore, NCLH still has not responded to all of the comments and inquiries from these agencies in the Branson application. (Please see CDA Project Status, January 15, 2016.)

CDA did not issue a NOP for the Hart Marin proposal or for the Branson proposal, so why has CDA issued a NOP for NCLH's current proposal, which is much vaguer and less finite and less stable? Is CDA understaffed (Project Manager Jeremy Tejirian and Environmental Manager Rachel Reid are on leave)? Is CDA exhausted from analyzing non-conforming, unproductive, and unapprovable proposals? Is CDA accommodating NCLH by fast-tracking public hearings before the Planning Commission and Board of Supervisors this calendar year because NCLH has gamed the system by waiting to apply for an extension of the 1984 Master Plan at the eleventh hour?

What should be clear is that no one can conduct an accurate traffic impact analysis without NCLH first providing the specific identity and operating characteristics of the educational institution in the proposal. NCLH's claim that the unidentified educational institution will "substantially conform with the underlying entitlements and historical operational pattern as a graduate school" is nothing more than speculation at this time. That claim is not the foundation for starting an EIR.

Similarly, the rationale for allowing NCLH to build a 1,200 seat auditorium, for example, without first determining whether the uses of the auditorium are related to the educational institution, seems backward. Even assuming that public theater productions and public speaking events, etc., are legal non-conforming uses of the existing facilities, then the economic justification for building and renting a new 1,200 seat auditorium for those uses is suspect because the historic frequency of those kinds of events at existing facilities has been very low and future use cannot be more intensive. (Please see Marin County Code Section 22.112) A new 1,200 seat auditorium could end-up in search of a new, currently non-permitted use, such as renting to local theater groups, in addition to the 4 other current non-permitted uses.

Marin County Code Enforcement has determined that NCLH currently is operating 4 non-permitted businesses:

Based on the background and facts in evidence, we have concluded that the following non-residential activities are unauthorized: (1) North Coast’s business offices; (2) the Golden Gate Academy, except to the extent that it enrolls children of Seminarians; (3) All Seasons Catering, except to the extent it serves Seminarians. In addition, we have determined that (4) renting the residential units to the general public is unauthorized as long as the 1984 Master Plan is in effect because the Master Plan permitted...
their development specifically for the purpose of providing housing for the students, staff, and faculty of the Seminary. (April 10, 2017 Letter, p.4)

NCLH has demonstrated a disregard for the Use Permit and conditions of approval. However, at the very least, NCLH is required to have a Business License for operating non-permitted businesses. As of last week, NCLH did not have Business Licenses for uses (1), (2), and (4) above, and NCLH has been operating these non-permitted businesses for over 1 year. It is inherently contradictory for CDA and NCLH to claim that NCLH is in substantial compliance with the 1982 SCP and the 1984 MP when NCLH has been operating non-permitted businesses and CDA knows about it.

The conflicting descriptions of NCLH’s project are problematic practically and perhaps legally. Inyo vs. Los Angeles found that:

A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance. An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. (Please see: Inyo v Los Angeles (1977) 71 CA3rd 185)

CDA and NCLH have not met this standard. NCLH’s proposal still is in the hypothetical stage. It is incomplete and confusing. It is not accurate, stable, or finite. It is not ready for environmental review.

For all of these reasons, we respectfully ask the Planning Commission to uphold the Riley Hurd Appeal and to rescind the NOP.

Very truly yours,

Bruce Corcoran
COMMUNITY DEVELOPMENT AGENCY
PLANNING DIVISION

PROJECT STATUS

January 15, 2016

Bruce Jones
North Coast Land Holdings LLC
2350 Kerner Blvd. Suite 360
San Rafael, CA 94901

RE: North Coast Land Holdings LLC Master Plan Amendment, Precise Development Plan, Tentative Map, Use Permit, and Tree Removal Permit
201 Seminary Drive, Strawberry
Project ID 2015-0343

Dear Mr. Jones,

The Planning Division and reviewing agencies have examined your application and have determined that it is incomplete because additional information is required.

Incompleteness Items
Please carefully review the list of required items below and submit 10 copies of full sized slip sheets of the revised plans, two complete full sized copies of the revised plans (one unstaepled), three complete copies of plans reduced to 11" by 17", and two copies of any required documents within the next 60 days.

Marin County Community Development Agency, Planning Division (Jeremy Tejirian, (415) 473-3798)

1. The proposed project is a substantial departure from the uses identified for the property in the Strawberry Community Plan (as amended). Submit a Community Plan amendment application for the Strawberry Community Plan, including a copy of the text as it exists with text to be removed struck out and new text to be underlined.

2. In conformance with submittal checklist item 21, submit additional information regarding the school use and operations. We are aware that scheduling details may not be possible to predict at this point, but please provide information regarding the number of staff and students onsite at any one time, hours of operation, projected peak hours of operation, and special events. Please also include information regarding public access to the site and the site's availability for community sponsored events.

3. Supplement the "Project Planning Development Matrix" by differentiating between the previously approved, existing, and proposed residential and institutional floor areas.
Provide totals for each, highlighting the changes from the 1984 Master Plan approval and the current proposal. While an explanation of the mathematical discrepancy within table 2 of the 1984 Master Plan is recommended, change the calculations if necessary to accurately reflect the existing number of units and their "unit type distribution." Provide calculations of each existing and proposed lot area, differentiating between dryland and submerged areas and a comparison with the areas indicated in the 1984 Master Plan. Label the previously approved, existing, and proposed densities for the Master Plan area. In addition, calculate densities based on the existing zoning districts covering the property.

4. In conformance with submittal checklist item 1, submit additional plans related to the Vesting Tentative Map application that clearly show the existing lot lines, indicate those lot lines to be eliminated as part of the proposed subdivision, and provide any title information necessary to verify the legal lot determinations. Clarify the purpose and intent of designating multiple units of real property that are proposed for development as "remainder parcels." Confirm that you wish to name the title of the tract "The Seminary" or revise the plans to indicate a different tract title.

5. In conformance with submittal checklist item 1, submit an additional plan related to the Vesting Tentative Map application that shows the proposed development in relation to the proposed lot lines. The development components can be screened back to make the proposed lot lines more distinct.

6. In conformance with submittal checklist item 1, provide a graphical representation of any site areas that require an exception from the Department of Public Works' standards.

7. In conformance with submittal checklist item 1, provide supplemental information clearly depicting all the pedestrian sidewalks, trails, and other access, which differentiates between accessible routes and normal routes. The connections of the routes to surrounding sidewalks and trails should be shown as well, and the location of bus stops should be indicated along with the bus route number. Also, indicate any routes that would be available for public access through the site.

8. In conformance with submittal checklist item 1, provide a bicycle access plan, which shows connections to bicycle access ways in the surrounding neighborhood, as well as the location of bicycle parking. If any bicycle improvements are proposed for the surrounding neighborhood, show the location and nature of those improvements.

9. In conformance with submittal checklist item 15, quantify of the area of proposed grassland restoration in relation to the area currently dominated by non-native plants, and provide a general description of the restoration methods.

10. In conformance with submittal checklist item 1, submit revised site plans indicating the locations of any solar facilities.

11. In conformance with submittal checklist item 9, if there are changes to the site plan, submit a revised staking plan that accurately shows the proposed layout.

12. In conformance with submittal checklist item 1, provide a fire access plan that shows distances from hydrants, turning radiiuses for fire access, surfaces for steep roads and driveways, and access paths between buildings.
In conformance with submittal checklist item 39, submit an affordable housing plan.

Marin County Department of Public Works, Land Development Division (Jason Wong, (415) 473-2918)

14. Per Marin County Code (MCC) 24.04.340(p), please provide a parking study for the Academic Campus, taking into consideration all the proposed shared usage of the different facilities. Also, schools shall have an off-street passenger loading area of an appropriate size. Clearly indicate and dimension this on the plans.

15. Please provide a "Stability Report" prepared by a Registered Civil Engineer with soils engineering expertise or a Registered Geotechnical Engineer. The report must attest to the suitability and geological feasibility of constructing all new roadways, buildings (residential and commercial), retaining walls, and identify any drainage or soils problems that the design of the project must accommodate.


17. Clearly identify any phased development that will occur in the construction of the proposed project.

18. The number of students currently enrolled at the university that live on-site or within walking distance should be specified and compared to the estimated/anticipated that would use alternative modes of transportation to/from school.

19. Additional documentation should be provided regarding the proposed uses of each of the buildings and the anticipated trip generation and parking demand for each (see attached proposed table).

20. The following items below will substantially modify the project. Please revise the plans to show compliance with each item or provide a written petition for an exception per MCC 24.15 for each non-compliant item. Please review MCC 24.15.015 and 24.15.020 for details of an exception request.

   A. Marin County Code (MCC) 24.04.110(a) specifies the required minimum paved width of a road depending on the road classification as specified in MCC 24.04.030. Also, per MCC 24.04.110(c), shoulders shall be provided on each side of all roads. The plans show that all roads serving the residential side of the development will be regraded and repaved, with the addition of two new roads, Shuck Knoll and Green Lane. Provide a table listing all roads, their road classification, their paved width with shoulders, and show how they comply with this code section.

   B. MCC 24.04.120 specifies the maximum grade for all road classifications. Indicate on a table the grades of all roads and how they comply with this code section.

   C. MCC 24.04.150 states that the end of cul-de-sac road shall be provided with a turnaround. Show how Storer Lane, Shuck Lane, and Chapel Drive will comply with this code section. Turnaround might not be required on Shuck Lane if Shuck Lane continues onto Shuck Drive. The location of the turnaround on Chapel Drive is not at
the very end of the road. Vehicles will have no turnaround if the street parking at the end of Chapel Drive is full.

D. **MCC 24.04.250** states that a minimum driveway length of twenty feet should be provided from the front of the garage or parking structure to the back of sidewalk or to the edge of pavement where no sidewalk exists. Buildings 11, 12, and 51 haven driveways that do not meet this code section. Please revise the plans to show how the driveways will meet this code section.

E. **MCC 24.04.277** states a turnaround may be required at the end of any driveway and/or adjacent to any parking area. **MCC 24.04.390** states that backout noses or turnarounds shall be provided to accommodate spaces located at the end of then access aisle or where otherwise necessary for maneuvering. The parking garages for buildings 20, 40, 50, and 60 all need a turnaround area at the end of all access aisles. Keep in mind that providing a turnaround may result in loss of parking spaces, which will need to be accounted for elsewhere on the property. Show how these parking garages will meet this code section.

F. **MCC 24.04.340(a)** states two parking spaces per unit are required. Where on-street parking is restricted or nonexistent, additional spaces may be required. Since on-street parking is restricted or nonexistent on most of the roads, a total of four parking spaces are required for each duplex unit, two residential parking spaces and two guest parking spaces. A total of 724 parking spaces are required for the residential development, 513 residential parking spaces and 211 guest parking spaces. Revise plans to show how the parking meets this code section.

G. **MCC 24.04.440(b)** states that sidewalks shall be required on only one side of each road within a residential area where densities will be less than four units per acre. Revise plans to show sidewalks on the following roads: Oliver Lane, Judson Lane, Shuck Knoll, and Shuck Lane at the end.

**Environmental Review**

Then proposed project will be subject to an Environmental Impact Report. During the environmental review process, we will be requesting additional information specifically related to the impacts analysis required for the environmental review.

**Submittal**

Please submit all of the requested information together to the Planning Division at one time. The review of your application may be delayed if you submit information directly to the agency that requested the information. The time period required by the State of California for review of the additional information will begin from the date we receive all of the required items at our office. Please note that legislative acts, including Community Plan amendments, are not subject to the Permit Streamlining Act. If you require additional time to collect the information listed above, please send me a written request for an extension for a specific period of time. It is important to ask for an extension if you need one because your application will automatically expire unless an extension of time is requested and granted.

**Appeal Rights**

Pursuant to the Marin County Code section 22.114.020 and Government Code section 65943, an applicant may appeal a determination that an application is incomplete. If you disagree with this decision regarding the incompleteness of your application, you may appeal to the Planning Commission. A Petition for Appeal and an $600.00 filing fee must be submitted to the Planning Division, Room 300, Civic Center, San Rafael, no later than 4:00 P.M. on Monday, February 1, 2016.
Questions and Contacts
Please do not hesitate to call me at (415) 473-3798 or contact me via email at JTejirian@marincounty.org as questions arise regarding your application or the development review process. I will return voicemail messages before the end of the next business day. Please do not visit our office expecting to meet with me without an appointment. If you wish to discuss your application in person, please contact me to schedule a time when we can meet. I will try to schedule an appointment within five business days. If you have questions about comments from another agency, please contact the staff from that agency directly. Thank you.

Sincerely,

Jeremy Tejirian
Planning Manager

Attachments:
1. Department of Public Works, Land Development Division comments, received 1-12-15
2. Department of Public Works, Traffic Operations comments, received 1-12-15
3. Marin Municipal Water District comments, received 11-30-15
4. City of Mill Valley comments, received 11-30-15
5. Southern Marin Fire Protection District comments, received 11-17-15
6. Richardson Bay Sanitary District comments, received 11-19-15
7. Department of Transportation comments, received 11-23-15

cc: Supervisor Sears
Brian Crawford, CDA Director
Tom Lai, CDA Assistant Director
Berenice Davidson, Senior Engineer
Bob Goralka, Senior Engineer
Jason Wong, Assistant Engineer
Mark Cavagnero, Cavagnero Associates
Strawberry Design Review Board
City of Mill Valley, Vin Smith
Town of Tiburon, Scott Anderson
Department of Transportation, Patricia Maurice
Marin Municipal Water District, Joseph Eischens
Southern Marin Fire Protection District, Fred Hilliard
Richardson Bay Sanitary District, Gary Roberts
INTER-OFFICE MEMORANDUM
DEPARTMENT OF PUBLIC WORKS
First Transmittal

DATE: January 12, 2016  DUE: January 12, 2016
TO: Jeremy Tejirian

AP#: 043-261-25, 043-261-26, 043-401-16e

APPROVED: [Signature]

ADDRESS: 201 Seminary Drive
Mill Valley, CA 94941

RE: Amendment, Precise
Development Plan, Use Permit
Amendment, Vesting Tentative
Map, and Tree Removal Permit

Department of Public Works Land Use Division
has reviewed this application for content and:

Find it COMPLETE

☑ Find it INCOMPLETE, please submit items listed below

☑ Find it ACCEPTABLE as presented

Incompleteness Items:

1) Per Marin County Code (MCC) 24.04.340(p), please provide a parking study for the Academice Campus, taking into consideration all the proposed shared usage of the different facilities. Also, schools shall have an off-street passenger loading area of an appropriate size. Clearly indicate and dimension this on the plans.

2) Please provide a "Stability Report" prepared by a Registered Civil Engineer with soils engineering expertise, or a Registered Geotechnical Engineer. The report must attest to the suitability and geological feasibility of constructing all new roadways, buildings (residential and commercial), retaining walls, and identify any drainage or soils problems that the design of the project must accommodate.

3) Provide a copy of the Transportation Demand Management (TDM) plan as specified in the Traffic Impact Analysis prepared by Kittelson & Associates, Inc.

4) Clearly identify any phased development that will occur in construction of the proposed project.

5) The number of students currently enrolled at the university that live on-site or within walking distance should be specified and compared to the estimated/anticipated that would use alternative modes of transportation to/from school.

6) Additional documentation should be provided regarding the proposed uses of each of the buildingse and the anticipated trip generation and parking demand for each (see attached proposed table).

7) The following items below will substantially modify the project. Please revise the plans to show compliance with each item or provide a written petition for an exception per MCC 24.15 for eache

☑ >1-acre site disturbance
☑ Flood Control
☑ Water Conservation
non-compliant item. Please review MCC 24.15.015 and 24.15.020 for details of an exception request.

a. Marin County Code (MCC) 24:04.110(a) specifies the required minimum paved width of a road depending on the road classification as specified in MCC 24.04.030. Also, per MCC 24.04.110(c), shoulders shall be provided on each side of all roads. The plans show that all roads serving the residential side of the development will be re-graded and repaved, with the addition of two new roads, Shuck Knoll and Green Lane. Provide a table listing all roads, their road classification, their paved width with shoulders, and show how they comply with this code section.

b. MCC 24.04.120 specifies the maximum grade for all road classifications. Indicate on a table the grades of all roads and how they comply with this code section.

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-END-
Date: December 9, 2015
To: Berenice Davidson
From: Bob Goralka
Re: North Coast Land Holdings Master Plan Amendment, Precise Development Plan, Use Permit Amendment, Vesting Tentative Map and Tree Removal Permit (Project ID: 2015-0343)
201 Seminary Drive

The Transportation Division has reviewed the planning transmittal, and traffic impact analysis prepared by Kittelson and Associates. Inc. dated October 30, 2015. Based upon our review of the traffic/transportation portions, we recommend that additional detail be provided in the project description and that the traffic impact study be found to be incomplete. We also include the following comments:

Project Description Incompleteness:

• The proposed project description should also identify any phased development that will occur in construction of the proposed project.

• The number of students currently enrolled at the university that live on-site or within walking distance should be specified and compared to the estimated/anticipated that would use alternative modes of transportation to/from school.

• Additional documentation should be provided regarding the proposed uses of each of the buildings and the anticipated trip generation for each (see attached proposed table).

Environmental Incompleteness Items:

• The characteristics of the roads in the vicinity of the proposed project that provide access to the proposed project, both onsite and offsite should be specified. These characteristics should include whether the road is public or private, the road widths, travel lanes widths and pedestrian and bicycle facilities that are existing and proposed on or alongside the roadway. Reference shall be made to the currently adopted Marin County Bicycle and Pedestrian Plan.

• The traffic impact study assumed that the trip generation rate for the proposed secondary school would be the same as the existing/previous university campus. The trip generation rate for a high school, however, would be substantially different since a substantially higher percentage of high school students would live at home and commute to school when compared to the university students many of whom live on campus and/or within walking/biking distance from campus.
• Background and documentation for the basis for the assumed trip distribution must be provided. Typically, the trip distribution for a project of this size is determined based upon the traffic forecasts conducted with the County-wide model that is maintained by TAM.

• The traffic study shall assess several traffic scenarios. These include the following:
  o Plan to Plan analysis that compares the trip generation build-out of the existing 1984 Master Plan with the trip generation of the proposed master plan. Potential traffic impacts based any increase in trips that would be generated by the build-out of the proposed master plan shall be provided.
  o A Plan to Ground analysis shall be provided that assesses potential traffic impacts that would result from build-out of the proposed master plan on the existing road network.
  o An existing plus project analysis shall be provided that assesses the direct traffic impacts that would occur with near term construction of the proposed project uses on the existing road network.
  o An existing plus project plus cumulative projects analysis shall be provided that assesses potential cumulative traffic impacts that would result from near term construction of the proposed uses with other currently active project in the area.

• In addition to the intersections included in the Preliminary Traffic Study prepared by Kittleson and Associates, the following intersections should be also included in the traffic impact study:
  o Ricardo Road/Reed Blvd
  o Ricardo Road/East Strawberry Drive
  o Belvedere Drive/East Strawberry Drive
  o Tiburon Blvd. (SR 131)/ North Knoll Drive
  o Reed Blvd/Knoll Road
  o E. Strawberry Drive and Herring Drive
  o E. Strawberry Drive and Harbor Point
  o E. Strawberry Drive and Weatherly Drive
  o Seminary Drive and Great Circle Drive

• The existing traffic volumes on Reed Blvd, Ricardo Road, Seminary Drive, East Strawberry Drive and Belvedere drive shall be specified. The amount of additional traffic that the proposed project will generate onto these streets shall
be identified and the potential impacts to residents that front these streets shall be assessed and discussed in the traffic impact study.

- Comments and requested items provided in the November 17, 2015 comments letter from Caltrans should be addressed and incorporated into the traffic impact study.

- Input from Caltrans, Marin County and adjacent jurisdictions should be obtained regarding the existing traffic signal timing of the traffic signals that are maintained by Caltrans. Several traffic signals are coordinated. Micro simulation of these traffic signal operations shall be included as part of the traffic impact analysis.

- Extensive queuing is occurring at several existing intersections, including Redwood Frontage Road/Tiburon Blvd (Hwy 131) and the on and off ramps to I-101. Queueing analysis shall be provided at these intersections.

**Additional Comments:**

The proposed project will generate over 100 peak hour trips and shall comply with the land use analysis/traffic impact analysis requirements and criteria specified in the Congestion Management Plan for the Marin County Region. Transportation Authority of Marin shall be provided a notice and project description of the proposed project. Comments/requirements shall be obtained from TAM regarding the scope of the traffic impact study (http://www.tam.ca.gov/index.aspx?page=84, http://www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=6959).

- The traffic impact study shall conform to the Caltrans Guide for the Preparation of Traffic Impact Studies (http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf). Caltrans shall be provided a notice and project description of the proposed project. Comments/requirements shall be obtained from Caltrans regarding the scope of the traffic impact study.

- Adjacent jurisdictions such as Mill Valley and Tiburon shall be provided a notice and project description of the proposed project. Comments/requirements shall be obtained from TAM regarding the scope of the traffic impact study.

- Adequate sight distance shall be verified at all of the on-site intersections and intersection of the private roads with County maintained roads.

**CC:** Berenice Davidson, DPW Land Development
Richard Simonitch, DPW Land Development
Jeremy Tejirian, CDA
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<td>Two Bedroom Units</td>
<td>Y**</td>
<td>54</td>
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<td>Three Bedroom Units</td>
<td>Y**</td>
<td>19</td>
<td>1</td>
<td>.55</td>
<td>19</td>
<td>106</td>
<td></td>
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<td>Four Bedroom Units</td>
<td>Y**</td>
<td>2</td>
<td>1</td>
<td>.55</td>
<td>2</td>
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<td>TOTAL**</td>
<td></td>
<td>209</td>
<td>1</td>
<td>.55</td>
<td>209</td>
<td>304</td>
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<td>95 Residential Units*</td>
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<td>12000</td>
<td>1</td>
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<td>12000</td>
<td>0</td>
<td></td>
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<tr>
<td>Classroom Building</td>
<td>N</td>
<td>25000</td>
<td>1</td>
<td>106</td>
<td>25000</td>
<td>25000</td>
<td></td>
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</tr>
<tr>
<td>Chapel/Auditorium</td>
<td>N</td>
<td>17000</td>
<td>1</td>
<td>106</td>
<td>17000</td>
<td>20000</td>
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</tr>
<tr>
<td>Gym/Health Center</td>
<td>N</td>
<td>12000</td>
<td>1</td>
<td>106</td>
<td>12000</td>
<td>12000</td>
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<tr>
<td>Day Care Center</td>
<td>N</td>
<td>3000</td>
<td>1</td>
<td>106</td>
<td>3000</td>
<td>0</td>
<td></td>
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</table>
Dear Ms. Scoble:

Parcels 043-261-25 & -26 are currently being served. The purpose and intent of these services are to provide water for indoor use and landscape irrigation. Parcel 043-401-16 is not currently being served and no water has been allocated to this property. The proposed redevelopment of these properties to include 93 new living units will require the installation of a new District pipeline. In addition, the upgrade of the District’s existing facilities to increase storage capacity may be required.

On May 5th, 2015, in response to the Governor’s Executive Order B-29-15, the State Water Resources Control Board adopted Resolution 2015-0032, “Emergency Regulations for Statewide Urban Water Conservation.” These regulations include mandatory actions to be taken by urban water suppliers and water end-users to promote water conservation statewide. One of the mandatory actions MMWD is required to implement under this resolution is to reduce total potable water production by 20%. Should the current drought persist beyond 2015, additional regulations and water reductions are likely to occur.

Upon completion and acceptance of these facilities, these properties will be eligible for water service upon request and fulfillment of the requirements listed below.

2. Submit a copy of the building permit.
3. Pay appropriate fees and charges.
4. Complete the structure’s foundation within 120 days of the date of application.
5. Comply with the District’s rules and regulations in effect at the time service is requested.
6. Comply with all indoor and outdoor requirements of District Code Title 13 – Water Conservation. Plans shall be submitted, and reviewed to confirm compliance. The following are required:
   • Verification of indoor fixtures compliance
   • Landscape plan
   • Irrigation plan
   • Grading plan

Any questions regarding District Code Title 13 – Water Conservation should be directed to the Water Conservation Department at (415) 945-1497. You can also find information about the District’s water conservation requirements online at www.marinwater.org.
7. Comply with the backflow prevention requirements, if upon the District’s review backflow protection is warranted, including installation, testing and maintenance. Questions regarding backflow requirements should be directed to the Backflow Prevention Program Coordinator at (415) 945-1558.

8. On November 3, 2015 the District’s Board of Directors adopted Ordinance No. 429 requiring the installation of gray water recycling systems for all projects required to install new water service and existing structures undergoing “substantial remodel” that necessitates an enlarged water service. The ordinance shall take effect 90 days from the date of adoption.

If you have any questions regarding this matter, please contact me at (415) 945-1532.

Sincerely,

Joseph Eischens
Senior Engineering Technician

JE:cb
November 23, 2015

Supervisor Kathrin Sears
3501 Civic Center Drive, Room 329
San Rafael, CA 94903

Dear Kate,

The City of Mill Valley would like to take an active partnership role with the County in the development review process for North Coast Land Holdings, LLC's newly proposed project for the Golden Gate Seminary property. We have vital interests at stake with a potential change in use and intensity for this significant site as do other adjacent local jurisdictions and the County of Marin generally.

In addition to monitoring information that is posted by staff on the County's website information page, the City of Mill Valley would like to engage directly with staff to stay informed and ensure that our participation in the development review process is timely and effective. To that end, we recommend that regular, perhaps quarterly, meetings with staff be initiated with the City of Mill Valley key staff and those of other adjacent, highly interested agencies and that this process be initiated as soon as possible.

Thank you for your consideration and support of our local interests. We look forward to hearing from you and beginning a close working relationship on this important project.

Best regards,

[Signature]

Vin Smith, Director
Mill Valley Planning and Building Department

Cc: Maureen Patton, Aide to Supervisor Sears
    Brian Crawford, Community Development Agency Director
    Tom Lai, Community Development Agency Assistant Director
    James McCann, City Manager, City of Mill Valley
    Scott Anderson, Community Development Director, Town of Tiburon
    Adam Wolff, Director of Planning and Building, Town of Corte Madera
    Danny Castro, Community Development Director, City of Sausalito
The proposed plans for the above-listed project have been reviewed. Based on the plans as submitted, the items noted below shall be imposed by the Southern Marin Fire Protection District (SMFD) in accordance with current requirements of the 2013 California Fire Code and SMFD ordinance and standards.

The following documents were reviewed:

- Drawings titled: Architectural Drawings part 1 & 2, Civil Drawings, Landscape Plans part 1 & 2, Campus Development Drawings, Residential Development Drawings
- Marin County Planning Division Transmittal Letter Dated: 10/27/2015
- Public Statement
- Applicant Submittal Information; Narratives, Exhibits 0-20, Exhibits A to G, Phase I Environment Site Assessment, Traffic Impact Analysis 10/30/15

This application was found to be incomplete, please provide the following items prior to resubmittal:

1. Several areas within the plans indicate agencies that do not have jurisdiction (i.e. Marin County Fire, Mill Valley Fire, and Marin County) please correct these errors to indicate Southern Marin Fire District is the AHJ. In addition, please check and correct if needed when ordinances and standards differ.

2. After reviewing the Traffic Impact Analysis, the fire district is concerned there was no consideration for fire department response from our current fire station located at 308 Reed Blvd during peak hours. We are very concerned we may see increased response times in addition to access/egress congestion. Our current response area for this station is; Tiburon, Mill Valley, Marin City, Sausalito, Mt.
Tam, & GGNRA. Please provide a traffic analysis indicating fire district response delay times for the Study Area locations you have listed in your report during peak hours.

3. All access roads serving a dwelling(s) shall be a minimum of 20 feet in width and be paved according to California Fire Code. Please indicate on the plans the roadway widths that conform to current California Fire Code, SMFD Ordinance and local Standards in delta’s and clouds.

4. Driveways serving this project shall meet the following standards related to dimensions, surfacing and slope.
   a. Driveways shall be a minimum of 16 feet in width
   b. The driveway shall not exceed a slope of 18% and be of an all-weather surface (asphalt or concrete or other approved material). Driveways between 18% and 22% may be allowed with the expressed written approval of the fire department. Slope in excess of 18% slope shall be finished with ribbed concrete.

5. All new driveways shall be designed so that emergency vehicles can negotiate turns without having to make backing maneuvers (no switchbacks).

6. All access roads or driveways in excess of 150 feet in length shall be provided with an approved turn-around.

7. In addition to the turn-around described above, driveways or access roads shall have turnouts every 150 feet as required by the fire district. A turnout shall be described as a shoulder or wide portion of the driving surface, which has enough usable surface which has enough usable surface for vehicles to pass.

8. The address shall be posted in accordance with requirements of the California Fire Code and SMFD standard 205 (Premises Identification).

9. The current turning radius on Shuck Knoll looks to be non-conforming with current codes and standards. Please indicate on the plans the turning radius for Shuck Knoll and that it is in compliance with current fire codes and SMFD standards.

10. Reed / Storer / Shuck Planning Area – Please provide access paths between buildings in order to comply with Chapter 5 section 503, 150 feet to the farthest point of the building from the spot of the fire engine. Please indicate on the revised plans as a cloud.

11. Please provide the type of surface and widths of the fire access road from the gate at the end of Building 70 to the gate of Strawberry Shores.
12. Please indicate on the plans fire apparatus route of travel from Shuck Drive to Gilbert with clouds and delta’s.

13. Fire Hydrants shall conform to SMFD Ordinance 2013 / 2014-21 section 507.1.1 Hydrant for sprinkler systems. Buildings equipped with a fire sprinkler system installed in accordance with section 903 shall have a fire hydrant within 100 feet of the fire department connection. Please indicate these locations on the plans with delta’s and clouds.

14. All proposed vegetation shall be non-pyrophytic in class as indicated in the UC Cooperative Extension guide – Pyrophytic vs Fire Resistant Plants. In addition, all new structures shall be required to provide the Fire District with a Vegetation and Fuel Management plan prior to final approval. Finally, please indicate on the plans the correct agency titles (Southern Marin Fire District).

Thank you,

Fred Hilliard
Captain, Deputy Fire Marshal
November 17, 2015

County of Marin
Attn: Heidi Scoble, Planner
Planning Division, Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903-4157

Re: North Coast Holdings Master Plan Amendment, Precise Development Plan, Use Permit Amendment, Vesting Tentative Map, and Tree Removal Permit
Assessor’s Parcels 043-261-25; 043261-26; 043-262-03; 043-262-06; 043-401-05; 043-401-10; 043-401-16; 043-402-03; 043402-06e
201 Seminary Drive, Mill Valley, CA 94941e
Project ID: 2015-0343e

As requested, the following is a review of the above mentioned documents on behalf of the Richardson Bay Sanitary District.

• The Development must be developed in accordance with Ordinance No. 73 which regulates the Construction, Use, and Maintenance of Sewer Laterals. Given the age of the system, we expect that all common private sewers and laterals will need to be replaced. If the sewer is to be reused, the private sewers must be inspected by CCTV to assess their condition and pass a pressure test.

• The proposed realignment on page C8.10 of a high pressure force main (with manholes) on Herring Drive around a proposed parking garage is unacceptable.

• A fixture unit count of both the existing dwelling units and the proposed dwelling units needs to be submitted. Please verify that all fixtures are accounted for prior to our issuing a connection permit.

• We will review the sewer drawings when the plans and profiles become available. At that time we can verify that the sewer lines have adequate downstream capacity.

• The Sewerage Agency of Southern Marin (SASM) operates the Ricardo Road Pump Station on Seminary Drive. Mark Grushayev of SASM should be contacted at 415-388-2402 directly.
This is not an implied approval of the application. As the application is processed new items may be revealed which must be provided. If you have any questions please give me a call at 415.453.4480 x205.

Yours Truly,

Richardson Bay Sanitary District

By: ____________________________
   Gary E. Robards, P.E.
   District Engineer
November 17, 2015

Ms. Heidi Scoble
County of Marin
Planning Division
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903-4157

North Coast Land Holdings Master Plan Amendment (2015-0343) – Application

Dear Ms. Scoble:

Thank you for including the California Department of Transportation (Caltrans) in the application review process for the North Coast Land Holdings Master Plan Amendment. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system, in which we seek to reduce statewide Vehicle Miles Traveled (VMT) and increase non-auto modes of active transportation. Our comments seek to promote the State's smart mobility goals and are based on the application. Additional comments may be forthcoming pending final review.

Project Understanding

The project applicant is requesting a Master Plan Amendment, Precise Development Plan, Use Permit Amendment and Tree Removal Permit in order to redevelop the existing Golden Gate Baptist Theological Seminary located at 201 Seminary Drive. The proposed project would replace the Seminary with 304 residential units and the Branson Secondary School, which would host 1,000 students and 200 faculty members. The existing site currently consists of 211 residential units comprised of student dormitories and faculty housing within 42 buildings as well as five institutional campus facilities. The proposed project would demolish 198 existing residential units and add 291 new units; remodel the Administration, Library and Cafeteria buildings; and construct a new Student Center (12,000 s.f.), Gymnasium/Health Center (17,000 s.f.), Chapel/Auditorium (25,000 s.f.), Day Care Center (3,000 s.f.) and addition to the Academic building (12,000 s.f.).

Primary vehicular access for the project site would be accessed via Seminary Drive at its intersections with Gilbert Drive and Hodges Drive. Regional access for the project site would be gained via nearby State facilities, U.S. 101 and State Route (SR) 131/Tiburon Boulevard.

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Lead Agency
As the lead agency, the County of Marin is responsible for all project mitigation, including any needed improvements to State highways. Mitigation measures involving State right-of-way (ROW) and State facility operations shall be evaluated and implemented in close coordination with the Caltrans. The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Where mitigation is a condition of approval, CEQA requires a Mitigation Monitoring and Reporting Program (MMRP) that requests information to include, but not limited to, the details listed below. Further information on the MMRP is available on the following website:
http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html

- Lead Agency contact name, address, and telephone number,
- Location, type and implementation schedule for each mitigation measure, and
- Signed and dated certification that the mitigation has been implemented, and all other reporting requirements have been adhered to, in accordance with Public Resources Code Sections 21081.6 and 21081.7.

Traffic Analysis
During construction and operation this project may generate traffic at volumes sufficient to impact the operations of U.S. 101 and SR 131. Please address the comments we have provided below in order to mitigate any project-related traffic impacts.

- Please provide Caltrans with a copy of the Golden Gate Theological Seminary Master Plan for consideration,
- The intersection of East Strawberry Drive/Bay Vista Drive/SR 131 should be analyzed to determine whether the existing left-turn lane can accommodate project-induced traffic volumes from westbound SR 131 to East Strawberry Drive/Bay Vista Drive,
- Please provide existing traffic data with date(s) of collection for study locations 5, 6, 15 and 16 as referenced in the Traffic Impact Analysis (TIA) on pages 3-4. In addition, please submit the projected project traffic for all study scenarios and indicate the percent traffic growth that was used. Initial review of the TIA indicates understated existing traffic data compared to the State traffic database,
- Please provide the detailed analysis of study area intersections 5, 6, 15 and 16 including the existing and project-generated traffic data,
- Please comment on the accuracy and validity of the assumption that all project-generated traffic flowing from U.S. 101 (northbound (NB) and southbound (SB)) will be using study intersections 5 and 6,
- Please provide Level of Service (LOS) calculations used for study intersections 4 and 6 (TIA, p. 25),

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Ms. Heidi Scoble, County of Marin  
November 17, 2015  
Page 3

What are the project-related impacts to U.S. 101 between the Richardson Bridge and north of SR 131? Are the end of queue(s) at the off-ramp(s) anticipated to extend to the mainline? Please support the response with applicable supporting documentation, and:

- Provide Caltrans with the Transportation Management Plan (TMP) referenced in Goal 3 – Reduction of Vehicle-Generated Pollutants (Attachment to Environmental Review Application, p. 24). The TIA does not adequately outline demand management strategies planned in order to ensure the expanded campus for the Branson School generates “the same or fewer vehicle trips than a university/college of 1,000 students as approved in the Master Plan.” Verification is needed to support the Branson School’s commitment.

Multimodal Planning
The project should be conditioned to ensure connections to existing bike lanes and multi-use trails to facilitate walking and biking to nearby jobs, neighborhood services, and local transit stops. The TIA has addressed study intersections 1, 4 and 6 to operate at LOS E or LOS F due to project-related impacts (p. 25). The Marin County Unincorporated Area Bicycle and Pedestrian Master Plan (2008) has proposed several bicycle improvements within the vicinity of these intersections whose construction should be included as a condition of project approval. Specifically, Class III bicycle lanes are proposed on Seminary Drive from Hodges Drive to Redwood Highway Frontage Road, on Redwood Highway Frontage Road from Seminary Drive to Belvedere Drive, and on Belvedere Drive from Redwood Highway Frontage Road to East Strawberry Drive. These routes would connect the project site to nearby bus stops located at Belvedere Drive/Redwood Frontage Road and Strawberry Frontage Road/ U.S. 101 NB on-ramp.

Providing these connections with streets configured for alternative modes transportation will reduce the number of project-generated trips and promote usage of nearby public transit lines. These measures also support the Metropolitan Transportation Commission’s Regional Transportation Plan/Sustainable Community Strategy that identifies transportation system performance targets including the increase of non-auto mode share by 10 percentage points and a decrease of VMT per capita by 10 percent.

Transportation Demand Management
We encourage you to incorporate Travel Demand Management (TDM) policies that facilitate the use of nearby Marin County Transit Routes 17, 22, 115 and 219 and Golden Gate Transit Routes 4, 8 and 10 into the project’s TMP. Moreover, in order to reduce regional VMT and traffic impacts to the SHS, further TDM options listed below should be included:

- Project design to encourage walking, bicycling, and convenient transit access
- Provide travel choice information to new employees, students and residents
- Provide multimodal wayfinding signage that facilitates internal circulation and access to nearby transit stops, private and shared vehicle parking, bicycle parking, showers and lockers

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• Parking cash out/parking pricing,
• Formation of a Transportation Management Association (TMA) in partnership with other developments in the area,
• Preferential parking located nearby the building entrance that is reserved for carpool/vanpool vehicles,
• Adoption of an aggressive trip reduction target with Lead Agency monitoring and enforcement,
• Transit fare incentives such as such as subsidized transit passes on a continuing basis.

**Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website linked below for more information:


Should you have any questions regarding this letter or require additional information, please contact Cole Iwamasa at (510) 286-5534 or cole.iwamasa@dot.ca.gov.

Sincerely,

[Signature]

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"