

DEPARTMENT OF TRANSPORTATION

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Governor's Office of Planning & Research

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Michelle Levenson, Senior Planner
County of Marin
3501 Civic Center Drive, Room 308
San Rafael, CA 94903

North Coast Land Holdings – Notice of Preparation (NOP) of an Environmental Impact report (EIR)

Dear Michelle Levenson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the North Coast Land Holdings project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the September 2020 NOP.

Project Understanding

The proposed project includes the following components: 1) construct a new 20,000 square feet (s.f.) facility to house a pre-school and fitness center; 2) replace a majority of the existing residences and dorm rooms with a mixture of single-family and multi-family residences and construct new single-family and multi-family residence (336 units in total); 3) construct a new 267,354 s.f. residential care facility; 4) renovate and expand the Administration Building; 5) demolish the existing maintenance building and construct a new 2,200 s.f. one in a different location; 6) install landscape and hardscape improvements associated with the school campus and residential development; and 7) provide open space and establish a network of trails throughout the project area. This 123-acre project site is located north of the Golden Gate Bridge and adjacent to US-101 and the Seminary Drive exit.

Travel Impact Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' [Transportation Impact Study Guide](#). The detailed Vehicle Miles Traveled (VMT) analysis should include the following:

- A VMT analysis pursuant to the County's guidelines or, if the County has no guidelines, the Office of Planning and Research's Guidelines. Projects that result in automobile VMT per capita above the threshold of significance for 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 City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities 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.
- Clarification of the intensity of events/receptions to be held at the location and how the associated travel demand and VMT will be mitigated.

Additionally, potential impacts due to the project generated trips on the US-101 should be analyzed, given that the project is in proximity to US-101. Please submit the transportation impact study to Caltrans when it becomes available.

Sea Level Rise

The effects of sea level rise may have impact on the transportation facilities located in the project area. California 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 years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect materials durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect sole pore pressure at dikes and levees on which the transportation facilities are constructed. All these factors must be addressed through the geotechnical and hydrological studies conducted in coordination with Caltrans.

Construction-Related Impacts

Because the project area is within close vicinity of US-101, potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified in the DEIR. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit:

<https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to US-101.

Lead Agency

As the Lead Agency, the County of Marin is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Yunsheng Luo at Yunsheng.Luo@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review
cc: *State Clearinghouse*