

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
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[www.dot.ca.gov](http://www.dot.ca.gov)



September 16, 2024

SCH #: 2020090488  
GTS #: 04-MRN-2020-00328  
GTS ID: 20703  
Co/Rt/Pm: MRN/101/4.65

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

### **Re: North Coast Land Holdings Master Plan and Community Plan Amendment Project— Draft Environmental Impact Report (DEIR)**

Dear Michelle Levenson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the North Coast Land Holdings Master Plan and Community Plan Amendment Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the July 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

#### **Project Understanding**

The proposed project is a Community Plan Amendment request to allow the redevelopment of portions of the existing Seminary campus. The proposed project would include the construction of a new 20,000 square-foot facility to house a 3,000 square-foot pre-school and 17,000 square-foot fitness center and replace most of the existing residences and dorm rooms with a mixture of 336 single-family and multi-family residences. The proposed project would construct a new, 267,354 square-foot residential care facility, renovate the Administration Building, install landscape and hardscape improvements, and demolish and construct a new 2,200 square-foot maintenance building.

### **Travel Demand 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 Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

Caltrans acknowledges that the project's VMT analysis and threshold establishment reflects the 2022 scoping plan with the 30 percent below 2019 level recommendation for statewide VMT to achieve the State's carbon neutrality goal by 2045. Per the IS/MND/DEIR, this project is found to have a significant VMT impact. The proposed mitigation measures identified in the DEIR should be documented with annual monitoring reports to demonstrate effectiveness. Additionally, please provide more information the threshold of significance for dedicated campus employees if available.

The DEIR mentioned that absent a countywide VMT reduction program, it would be infeasible for any individual residential project in high VMT generating areas to achieve the VMT reduction target of more than 30 percent through typical levels of investment in transit, bike, or walking strategies. The County of Marin shall consider exploring feasible countywide VMT mitigation program options through which individual project located in high VMT areas could contribute fair share fees to help further reduce the VMT impact to a less-than-significant level.

Please note that Transportation Authority of Marin (TAM)'s VMT Reduction and Mobility Enhancement Toolkit was awarded through Caltrans' Sustainable Transportation Planning Program to assist local agencies in identifying and quantifying mitigations to VMT impacts and improve multimodal transportation to serve Marin's residents. The County is encouraged to collaborate with Caltrans and TAM to assess and develop a regional VMT mitigation program to reduce VMT in an effective and feasible manner.

### **Fair Share Contributions**

We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Caltrans suggests the Lead Agency consider requesting fair share contributions to the following Regional Transportation Plan (Plan Bay Area 2050) projects of significance to help further mitigate the proposed project's transportation impact:

- Operate & Maintain the Existing System | Public Transit Capital Assets | Regional (RTP ID 21-T01-002) – a regional Public Transit Capital Assets program that

includes funding to maintain and replace the Bay Area's baseline transit capital assets. Improvements include vehicle rehabilitation or replacement; reconstruction or renovation of transit buildings and structures; and rehabilitation or reconstruction of track.

- Other Investments to Enhance Local Transit Frequency, Capacity & Reliability | Regional (21-T10-093) – a regional program that includes funding to implement other programmatic investments to enhance local transit frequency, capacity and reliability. This program generally implements county, transit agency, and other local programs and initiatives to make bus and light rail travel faster and more reliable. Improvements include fleet and facilities expansions; transit corridor improvements; and transit station improvements. Example investments include implementation of San Francisco Municipal Transportation Agency's bus and facility expansion (Core Capacity) and Parkmerced Transportation Improvements; and Santa Clara County's High-Capacity Transit Corridors program, SR 85 Corridor Improvements, and Downtown Coordinated Area Plan and Transit Center Improvements.

Additionally, it is suggested that the Lead Agency consider requesting fair share contributions to a locally sponsored project (EA 1Y880) which is an interchange improvement project located on US-101 in Marin County. The project includes enhanced transit services, safety improvements for bicycle and pedestrian access through the interchange, and circulation and signal improvements to nearby intersections. It is currently in the project initiation document phase.

### **Air Quality**

*DEIR pg. 167, Table 3.2-4: 2026 reactive organic gases (ROG) and carbon monoxide (CO) emissions for 2026 and fine particulate matter 2.5 (PM2.5) Bay Area Air Quality Management District (BAAQMD) Threshold values do not match Appendix C pg. 523.*

*DEIR pg. 167, Tables 3.2-4 and 3.2-5: BAAQMD Thresholds of Significance are for PM2.5 and respirable PM10 exhaust and do not match Appendix C pg. 523.*

*DEIR pg. 167, Table 3.2-5: CO emissions shown for all years do not match Appendix C pg. 523.*

*DEIR pg. 168, Table 3.2-6: could not be verified from Appendix C pgs. 957-992. Please include a summary table for operational emissions in Appendix C.*

*DEIR pg. 233: Energy Consumption numbers do not match between Table 3.5-1 and Appendix C pg. 1012.*

*DEIR pg. 276: Carbon dioxide equivalent (CO<sub>2</sub>e) total emissions do not match Mitigated CO<sub>2</sub>e emissions in Appendix C pg. 523 and Section 3.7-1 metric tons of*

carbon dioxide equivalent (MTCO<sub>2e</sub>) for 2027 operations do not match the number in Table 3.7-2.

*Appendices pg. 523:* Please verify why CO, CO<sub>2e</sub>, and carbon dioxide (CO<sub>2</sub>) Mitigated are higher than Unmitigated and Annual Average Emissions for CO<sub>2e</sub> Unmitigated and Mitigated are incorrect.

*Appendices pgs. 572 and 573:* Please include year 2027 emissions. Per Air Quality Section 3.2.3 and Appendix C pg. 523 summary tables, the construction duration is only considered between years 2023 through 2026.

*Appendices pg. 573:* Please include 2026 Unmitigated CO<sub>2e</sub> emissions for the New Fitness and Daycare Center.

*Appendices pgs. 995 and 996:* Please include Attachment A.

*Appendices pg. 1012, Energy Cals Summary Page – Operations Table:* Please revise values for Gas and Diesel for Mobile Sources.

### **Sea Level Rise**

Please ensure that Caltrans District 4 is kept informed about any climate stressors affecting the project location, as well as the progress of adaptation and resilience initiatives. District 4 has a vested interest in this area due to current and planned adaptation efforts that Caltrans is coordinating with partner agencies in Marin County, including the County of Marin and the Transportation Authority of Marin.

Notably, sections of US-101—specifically near Coyote Creek, across from the project location, and Donahue Street in Marin City—are vulnerable to flooding from a combination of king tides, storm surges, and rising water levels. As development continues, please ensure Caltrans is included in discussions and updates on local efforts, given our commitment to collaborating with regional and local partners on transportation system adaptation strategies.

Additionally, please notify Caltrans if there are any updates or changes to wildfire evacuation or emergency management plans for the project area or the Strawberry Peninsula, especially regarding ingress and egress routes through SR 131 and US-101.

For any inquiries or concerns related to District 4's geographical boundaries, please contact the Caltrans Bay Area Climate Change Planning Coordinator, Lucius Wu, at [lucius.wu@dot.ca.gov](mailto:lucius.wu@dot.ca.gov).

## Non-CEQA Comments

It is aware that Level of Service (LOS) is no longer a metric used to analyze transportation impacts under CEQA. Caltrans has reviewed the Appendix Q and R and provides comments below for the LA to consider.

### Appendix Q – Traffic Impact Study

Analysis Scenarios section: the traffic counts for the existing condition were collected in December 2021; however, according to the Traffic Operations Policy Directive No. 23-01 ([link](#)) issued on January 30, 2023 from Caltrans, due to the potential abnormal traffic patterns created by the COVID-19 pandemic, traffic analyses conducted for all projects on the STN shall not use traffic data collected between March 13, 2020 and January 31, 2022.

Project Trip Generation section: please clarify how the numbers of daily trips were generated based on the different numbers and types of resident units and other facilities. Please include the supporting calculation sheets and show a table with the assumption of distribution used for each number of the in & out peak hour trip. Also, please demonstrate how those numbers would result into the assumed peak hour traffic volumes for each scenario at each evaluated location shown on Figure A-1 in Appendix R.

Transportation Safety section: if available, please provide fatality information.

Project Parking Generation section: please clarify why the project proposed 703 residential parking spaces instead of 539 required by the Marin County Municipal Code.

### Appendix R – LOS Assessment Memo

Please include the input parameters, cycle length, time-space diagrams, and queue analysis when applicable in the Synchro analysis report. If available, please provide supporting documents for the pedestrian/bike adjustment factor and the 2% HV assumptions for all locations.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Michelle Levenson, Principal Planner  
September 16, 2024  
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Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" and last name "Yunsheng" clearly distinguishable.

YUNSHENG LUO  
Branch Chief, Local Development Review  
Office of Regional and Community Planning

c: State Clearinghouse