

## MEMORANDUM

**TO:** Marin County Planning Commission

**DATE:** March 27, 2026

**FROM:** Rachel Reid, Environmental Coordinator  
Michelle Levenson, Principal Planner  
Tammy Taylor, Senior Planner

**SUBJECT:** North Coast Landholdings LLC  
Community Plan Amendment, Master Plan, Design Review,  
Tree Removal Permit, Master Use Permit and Vesting Tentative  
Map, and Certification of the Final Environmental Impact Report  
(EIR)  
201 Seminary Drive, community of Strawberry, Mill Valley Parcel  
Nos. 043-261-25, 043-261- 26, 043-262-03,  
043-262-06, 043-401-05, 043-401-10,  
043-401-16, 043-402-03, 043-402-06  
Project ID P1490

The purpose of this memorandum is to provide an EIR consistency assessment as an amendment to the Final EIR that covers the subsequent Environmental Settlement Agreement (ESA) that was settled on March 1, 2026 between the applicant and the Seminary Neighborhood Association. The findings are encompassed in the enclosed Final EIR amendment.

**ATTACHMENT:**

1. Final EIR Amendment and ESA Consistency Assessment

ENVIRONMENTAL IMPACT REPORT CONSISTENCY ASSESSMENT

# North Coast Land Holdings Master Plan and Community Plan Amendment Project (Project ID: P1490); Amendment to the Final Environmental Impact Report

SCH No. 2020090488



Prepared for:



Community Development Agency

March 2026

ENVIRONMENTAL IMPACT REPORT CONSISTENCY ASSESSMENT

**North Coast Land Holdings Master Plan and Community Plan Amendment  
Project (Project ID: P1490); Amendment to the Final Environmental Impact  
Report**

SCH No. 2020090488

Prepared for:



**County of Marin**  
**Community Development Agency**  
3501 Civic Center Dr, Suite 308  
San Rafael, CA 94903

Contact:

**Michelle Levenson**  
Principal Planner  
415.473.3615

Prepared by:



**Ascent Environmental**  
455 Capitol Mall, Suite 300  
Sacramento, CA 95814

Contact:

**Tanya Jones**  
Project Manager  
949.563.9503

March 2026

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# LIST OF ABBREVIATIONS

agreement	Environmental Settlement Agreement
ALUC	airport land use plan
BAAQMD	Bay Area Air Quality Management District's
BASMAA	Bay Area Stormwater Management Agencies Association
BMP	best management practices
CAAQS	California Ambient Air Quality Standards
CBC	California Building Code
DTSC	California Department of Toxic Substances Control's
SWRCB	California State Water Resources Control Board's
CUPA	Certified United Programs Agency
EV	electric vehicle
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration's
FHSZ	Fire Hazard Severity Zones
HRA	Health Risk Assessment
LRA	Local Responsibility Area
County	Marin County
CAP	Marin County Climate Action Plan
MEI	maximally exposed individual
MLHMP	Multi-Jurisdictional Local Hazard Mitigation Plan
NAAQS	National Ambient Air Quality Standards
REC	non-recognized environmental conditions
Final EIR	North Coast Land Holdings Master Plan and Community Plan Amendment Project Final EIR
NOA	notice of availability
EOP	Operational Area Emergency Operations Plan
PPV	peak particle velocity
PRA	Purcell, Rhoades & Associates
RHNA	Regional Housing Needs Allocation
SLR	sea-level rise
SMFD	Southern Marin Fire District

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SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminants
TDM	Transportation Demand Management
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WUI	Wildland Urban Interface

# 1 SUMMARY PROJECT INFORMATION

<b>Project title:</b>	North Coast Land Holdings Master Plan and Community Plan Amendment Project (Project ID: P1490)
<b>Project location:</b>	201 Seminary Drive, Mill Valley, CA 94941
<b>Lead agency's name and address:</b>	Marin County, Community Development Agency 3501 Civic Center Dr, Suite 308, San Rafael, CA 94903
<b>Contact person:</b>	Michelle Levenson, Principal Planner Marin County, Community Development Agency 3501 Civic Center Dr, Suite 308 San Rafael, CA 94903 415.473.3615
<b>Applicant's name and address:</b>	Bruce Jones, North Coast Land Holdings, LLC 2350 Kerner Blvd, Suite 360, San Rafael, CA 94901
<b>Location of administrative record:</b>	Marin County, Community Development Agency 3501 Civic Center Dr, Suite 308, San Rafael, CA 94903

**Assessment of Consistency with Previously Prepared EIR:** This environmental impact report (EIR) consistency assessment has been prepared as an amendment to the North Coast Land Holdings Master Plan and Community Plan Amendment Project Final EIR. It evaluates whether an environmental analysis of changes in the project description proposed by the applicant at the March 2, 2026 Planning Commission public hearing is consistent with the impact analysis reported in the Draft and Final EIR. The assessment concludes that none of the circumstances described in Section 15088.5 of the State CEQA Guidelines, which is the section describing criteria for recirculating a Draft EIR, have occurred. The refinements to the North Coast Land Holdings Master Plan and Community Plan Amendment Project (refined project or project refinements) proposed at the March 2, 2026 hearing will not result in any new significant environmental effects that were not already discussed in the Draft and Final EIR (State Clearinghouse No. 2020090488), nor any substantial increase in the severity of any significant environmental effects.

The Draft and Final EIR evaluated the physical environmental effects of the North Coast Land Holdings Master Plan and Community Plan Amendment, which proposes upgrades to existing housing and construction of new housing, a new daycare and fitness center, residential care facility, renovation of academic buildings, new campus maintenance building, retention and improvements to existing open space and recreation areas, and creation of new bicycle and pedestrian paths within the 101-acre project site.

The North Coast Land Holdings Project application materials and its Draft and Final EIR are available for review at the following location and online at:

- ▶ Marin County Community Development Agency, 3501 Civic Center Dr, Suite 308, San Rafael, CA 94903
- ▶ Online at: <https://www.marincounty.gov/departments/cda/planning/projects/mill-valley-alto/north-coast-land-holdings-community-plan-amendmentmaster-plandesign-reviewmaster-use-permittentative-maptree-removal-permit-former-golden-gate-baptist-seminary-property-p1490>

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## 2 INTRODUCTION

### 2.1 PURPOSE OF THIS EIR CONSISTENCY ASSESSMENT

On July 16, 2024, Marin County (County), as the lead agency pursuant to CEQA, circulated the Draft EIR for the North Coast Land Holdings Project to members of the County Planning Commission, Board of Supervisors, State Clearinghouse, state and local agencies and special districts, surrounding property owners, and other interested groups and individuals for a 60-day public review period ending on September 16, 2024. Following the close of the public comment period, on December 12, 2025, the Final EIR and a notice of availability (NOA) of the Final EIR for review were distributed to members of the County Planning Commission, Board of Supervisors, State Clearinghouse, state and local agencies and special districts, and other interested groups and individuals. Then, on March 2, 2026 the County Planning Commission conducted a duly noticed public hearing to consider a recommendation to the Board of Supervisors to certify the Final EIR. It was during this hearing that North Coast Land Holdings, LLC (North Coast or applicant) announced refinements to the project description in accordance with an agreement (Environmental Settlement Agreement) with the Seminary Neighborhood Association.

This EIR consistency assessment has been prepared as an amendment to the North Coast Land Holdings Master Plan and Community Plan Amendment Project Final EIR (State Clearinghouse No. 2020090488). It describes the project refinements and evaluates their consistency with the proposed project's Draft and Final EIR. The evaluation is intended to (a) evaluate whether the project refinements would alter any of the environmental impact conclusions in the North Coast Land Holdings Project EIR or require any substantial changes to mitigation measures; (b) determine whether the proposed project refinements sustain an "accurate, stable, and finite" project description; and (c) assess whether any of the circumstances described in State CEQA Guidelines Section 15088.5 requiring the recirculation of the Draft EIR would occur.

As presented below, the project refinements have been found to be consistent with the basic project objectives of the project and maintain an accurate, stable, and finite description of the proposed project evaluated in the North Coast Land Holdings Project Draft and Final EIR. The refined project would not result in any new significant effects on the environment nor substantially increase the severity of environmental effects reported in the Draft and Final EIR. Consequently, the applicant's proposed refinements would not require any new or substantially revised mitigation and do not meet the circumstances described in State CEQA Guidelines Section 15088.5 calling for Draft EIR recirculation.

### 2.2 NORTH COAST LAND HOLDINGS PROJECT EIR OVERVIEW

The North Coast Land Holdings Project EIR evaluated proposed redevelopment of the former Golden Gate Baptist Theological Seminary campus involving upgrades to existing housing and construction of new housing, construction of a new residential care facility; renovation of academic buildings; a new campus maintenance building, accessory childcare and fitness facilities; retention and improvements to existing open space and recreation areas; and creation of new bicycle and pedestrian paths within the 101-acre project site. As summarized in Table ES-1, "Summary of Impacts and Mitigation Measures," in the "Executive Summary" chapter of the Draft EIR, the North Coast Land Holdings Project would have the potential to cause the following significant environmental impacts.

## 2.2.1 Less-Than-Significant After Mitigation Impacts

The North Coast Land Holdings Project would have the potential to cause the following potentially significant and significant but mitigable environmental impacts. After mitigation, these listed impacts would be reduced to a less-than-significant level. Although clarification and data updates have occurred for some impacts, none of the impact significance determinations before or after mitigation expressed in the Draft EIR have changed in the Final EIR after review of public comments and preparation of responses.

- ▶ **Aesthetics:** Conflict with Applicable Zoning and other Regulations Governing Scenic Quality; Create a New Source of Substantial Light or Glare that would Adversely Affect Day or Nighttime Views in the Area
- ▶ **Air Quality:** Generate Short-Term Construction-Related Emissions; Expose Receptors to TAC Concentrations Adversely Affecting a Substantial Number of People
- ▶ **Archaeological, Historical and Tribal Cultural Resources:** Cause a Substantial Adverse Change in the Significance of a Listed Archaeological Site; Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource
- ▶ **Biological Resources:** Potential Disturbance or Loss of Special-Status Plants; Potential Disturbance or Loss of Monarch Butterfly; Potential Disturbance or Loss of White-Tailed Kite and Other Common Nesting Birds; Potential Disturbance or Loss of Special-Status and Common Bat Maternity and Hibernation Roosts; Potential Degradation or Loss of Oak Woodlands
- ▶ **Geology and Soil:** Loss, Injury, or Death Resulting from Seismically-Induced Ground/Structural Failure Including Slope Instability, Liquefaction, and Lateral Spreading; Slope Instability/Landsliding
- ▶ **Land Use and Planning:** Conflict with Land Use Plans, Policies, or Regulations Adopted to Avoid or Mitigate Environmental Effects
- ▶ **Noise and Vibration:** Generate Substantial Long-Term Increase in Stationary Source Noise Levels
- ▶ **Public Services and Recreation:** Result in Increased Demand for Fire Protection Facilities and Services
- ▶ **Transportation:** Substantially Increase Hazards due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., farm equipment); Result in Inadequate Emergency Access

## 2.2.2 Significant and Unavoidable Impacts

The North Coast Land Holdings Project would result in the following significant and unavoidable impacts; that is, feasible mitigation is not sufficiently available to reduce the project's impacts to a less-than-significant level. The following significant and unavoidable impacts are the same as described in the Draft EIR.

- ▶ **Greenhouse Gas Emissions and Climate Change Vulnerability:** Project-Generated GHG Emissions (project and cumulative)
- ▶ **Noise and Vibration:** General Substantial Temporary Construction Noise (project)
- ▶ **Transportation:** Conflict or Be Inconsistent with State CEQA Guidelines Section 15064.3, Subdivision (b) Regarding Vehicle Miles Traveled (project and cumulative)

## 2.3 EIR CONSISTENCY ASSESSMENT

This consistency assessment compares the analysis and conclusions of the North Coast Land Holdings Project EIR with the impacts of the refined project. The approach to the consistency assessment uses a modified State CEQA Guidelines Appendix G checklist to address the following questions for each environmental factor or resource area evaluated in the North Coast Land Holdings Project EIR:

- ▶ Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?
- ▶ Do the proposed project refinements result in a new or substantially more severe significant impact?
- ▶ Do any changes in the environmental setting result in a new or substantially more severe significant impact?
- ▶ Do the proposed project refinements warrant revision to a mitigation measure?
- ▶ Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?

This assessment is intended to provide decision makers with the information needed to determine if the refined project is adequately covered in the North Coast Land Holdings Project EIR, warrants recirculation of a Draft EIR, and sustains a stable project description.

## 2.4 REQUIREMENTS FOR RECIRCULATION OF AN EIR

A lead agency is required to recirculate a Draft EIR when the agency adds “significant new information” to the EIR after the close of the public comment period but before certification of the Final EIR (PRC Section 21092.1; State CEQA Guidelines Section 15088.5). “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement” (State CEQA Guidelines Section 15088.5[a]). As outlined in Section 15088.5(a), “significant new information” includes information showing that:

- ▶ a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- ▶ substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- ▶ a feasible project alternative or mitigation measure considerably different from that discussed in the Draft EIR would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it; or
- ▶ the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In considering consistency with the North Coast Land Holdings Project EIR conclusions, this assessment will inform whether any of the conditions described in State CEQA Guidelines Section 15088.5 calling for recirculation of an EIR have occurred.

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### 3 DESCRIPTION OF PROJECT REFINEMENTS

The project applicant announced at the County Planning Commission public hearing on March 2, 2026, that they and the Seminary Neighborhood Association entered into an Environmental Settlement Agreement focused on further reducing traffic, vehicle miles traveled, evacuation, and public services impacts as well as other environmental impacts identified in the North Coast Land Holdings Project EIR. The agreement included certain changes in the project description to refine targeted project details. The project refinements outlined in the Environmental Settlement Agreement represent a voluntary set of enforceable restrictions and commitments related to educational uses, enrollment, housing, and reporting obligations. The provisions of the agreement include:

- ▶ Educational uses on the project site shall be limited to graduate, post-graduate, and/or research program uses.
- ▶ Maximum graduate, post-graduate, and/or research program enrollment up to 325 people may occur without any requirement that such people reside on the project site.
- ▶ Any graduate, post-graduate, and/or research program on-site enrollees in excess of 325 shall be required to reside on the project site in residential units proposed as part of the project evaluated in the North Coast Land Holdings Master Plan and Community Plan Amendment Project Final EIR (Final EIR) SCH No. 2020090488.
- ▶ No later than June 1 of each calendar year, the head administrator of the educational institution shall submit to the Marin County Community Development Agency Director a sworn affidavit certifying compliance, including: (i) The peak number of enrolled on-site students during the prior calendar year; (ii) The number of on-site students residing on the project site; (iii) The total number of employees associated with the educational uses of the project site and the number of on-site employees associated with the educational uses residing on the project site; and (iv) The number of daycare and fitness center users that live on and off the project site.
- ▶ Marin County shall have the right, upon 48 hours' written notice and during normal business hours, to conduct inspections and audits reasonably necessary to verify compliance.
- ▶ Developer shall work in good faith, to the extent permitted by law, to prioritize on-site housing for students, staff, and employees of the project in order to reduce vehicle trips.
- ▶ The fitness center and daycare facilities shall be limited to residents and individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, the facilities may be offered for use to people in the surrounding Strawberry neighborhood.
- ▶ Limit all project buildings to no more than three stories of habitable space, except for: (1) three buildings within the Hodges/Shuck Planning Area, which shall not exceed four stories of habitable space; and (2) buildings in the Residential Care Facility Senior Housing area which shall not exceed the heights shown in the project plan set dated January 31, 2020.
- ▶ For a period of fifteen (15) years following final project approval, Developer shall not seek approval for additional development on the project site beyond that shown in the project plans or beyond the school use contemplated herein if such development would increase daily traffic trips by 5% or more above the number of trips associated with the project plans and the school use contemplated herein according to the Institute of Transportation Engineers Trip Generation Manual.
- ▶ After final approval, Developer shall not seek County approval for project amendments or changes to any project conditions of approval that would increase daily traffic trips by 5% or more above the number of trips associated with the project plans and the school use contemplated herein according to the Institute of Transportation Engineers Trip Generation Manual.

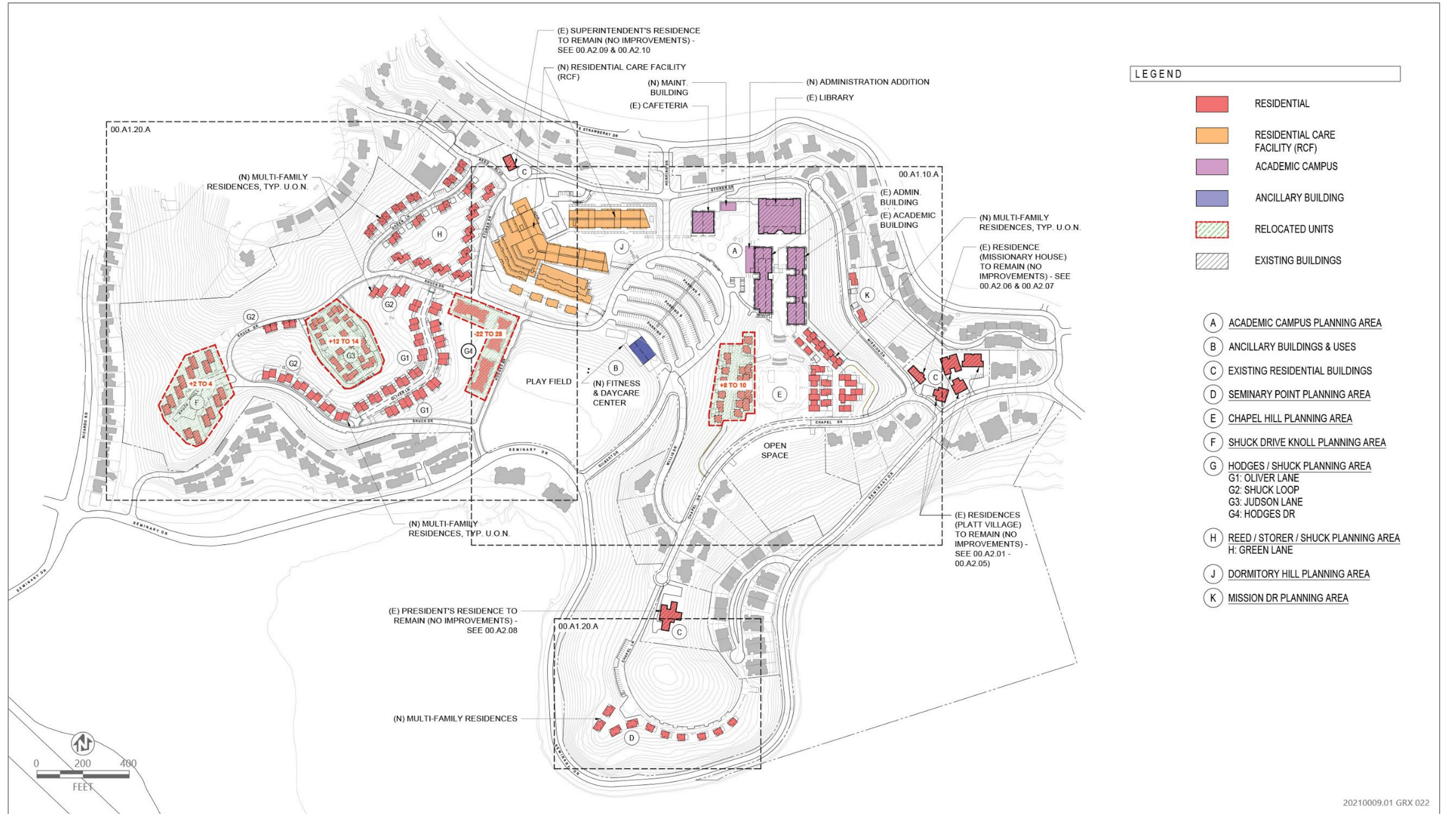
Table 4-1 below outlines relevant elements of the proposed project and environmental impact analysis in the North Coast Land Holdings Project EIR. The table summarizes existing uses and setting features of the project site, the pertinent components of the proposed project described in the Draft and Final EIR, and the proposed project refinements.

**Table 4-1 Summary of Existing Uses, Proposed Project Uses, and Proposed Project Refinements**

Land Use	Existing Uses and Features	Proposed Project Components in the Draft and Final EIR	Proposed Project Refinements
Academic Campus	<ul style="list-style-type: none"> <li>▶ Academic building</li> <li>▶ Administration building</li> <li>▶ Cafeteria</li> <li>▶ Library</li> <li>▶ Maintenance building</li> <li>▶ Permitted maximum student population of 1,000; baseline student population of 100 at time of NOP</li> <li>▶ Occasional conferences and large gatherings</li> </ul>	<ul style="list-style-type: none"> <li>▶ Retain academic building, cafeteria, and library</li> <li>▶ Renovate administration building, including adding floor area</li> <li>▶ Demolish existing maintenance building and construct new maintenance building</li> <li>▶ No change to the permitted enrollment at the academic campus; maximum student population of 1,000</li> </ul>	<ul style="list-style-type: none"> <li>▶ Academic programs on the project site would be restricted to graduate, post-graduate, and/or research programs</li> <li>▶ Uses involving primary or secondary education would not be allowed</li> <li>▶ Enrollment for commuting students residing off the project site would be limited to 325 students</li> <li>▶ Student enrollment in excess of 325 commuting students would either need to be enrolled in on-line learning (with no associated physical presence or trips to and from the campus) or be required to reside on the project site in residential units proposed as part of the proposed project</li> </ul>
Daycare and Fitness Center	<ul style="list-style-type: none"> <li>▶ Existing daycare in an academic campus building; there is no existing fitness center</li> <li>▶ Current enrollment of approximately 60 children and 16 staff</li> </ul>	<ul style="list-style-type: none"> <li>▶ Revert existing daycare space to academic uses. Construct facility for a daycare and fitness center</li> <li>▶ Enrollment of approximately 60 children and 16 staff at daycare</li> <li>▶ Limited enrollment in fitness center with three staff</li> </ul>	<ul style="list-style-type: none"> <li>▶ Daycare and fitness center facilities would be limited to residents and individuals who live or work on-site</li> <li>▶ If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered for use to residents in the surrounding Strawberry neighborhood</li> </ul>
Residential	<ul style="list-style-type: none"> <li>▶ Seminary Point Planning Area: 24 one-bedroom units and one single-family residence (President's residence)</li> <li>▶ Hodges/Shuck Planning Area: 16 studios, 30 one-bedroom units, and 47 two-bedroom units</li> <li>▶ Reed/Storer/Shuck Planning Area: seven two-bedroom units and eight three-bedroom units, as well as one single-family home (the superintendent's residence)</li> <li>▶ Mission Drive Planning Area: 10 three-bedroom units (Platt Village) and one single-family residence (Missionary house)</li> <li>▶ Dormitory Hill Planning Area: two-building dormitory with 66 dorm rooms and seven shared kitchens</li> </ul>	<ul style="list-style-type: none"> <li>▶ Seminary Point Planning Area: Retain the existing single-family residence, demolish the 24 existing one-bedroom units, and construct eight two-bedroom units and six three-bedroom single-family residences, resulting in a reduction in the number of units in the planning area from 25 units to 15 units.</li> <li>▶ Hodges/Shuck Planning Area: Demolish all existing units and construct 14 one-bedroom apartments, 44 two-bedroom units, and 56 three-bedroom units. In the northwest corner of Hodges Drive and Shuck Drive, three six-story residential buildings (including a total of 103 units) would be constructed, including eight one-bedroom apartment units, 32 two-bedroom apartment units, and 63 three-bedroom apartment units. The total number of units in the planning area would increase by 124 units for a total of 217 units.</li> <li>▶ Reed/Storer/Shuck Planning Area: Retain existing single-family residence, demolish other existing units and construct</li> </ul>	<ul style="list-style-type: none"> <li>▶ The design refinements in the Hodges/Schuck Planning Area would involve the following: Hodges/Schuck Planning Area: Demolition of all existing dwelling units contained in 25 buildings and construct 52 one- and two-story buildings containing 114 residential units, and three, up to four-story buildings containing up to 103 residential units, which total may be reduced by up to 28 residential units to accommodate a reduction from originally proposed six stories to four stories. To maintain the originally proposed total of 337 residential units on the project site, 28 residential units would be relocated within the project site, accommodated within modified buildings in specified planning areas shown in Figure 4-1. The final unit count and precise location would be confirmed during the design review approval process. Figure 4-1 shows a conceptual site plan identifying planning areas where residential units would be proposed for redistribution.</li> </ul>

Land Use	Existing Uses and Features	Proposed Project Components in the Draft and Final EIR	Proposed Project Refinements
		<p>36 three-bedroom units in three buildings, increasing the number of units in the planning area by 21 units.</p> <ul style="list-style-type: none"> <li>▶ Mission Drive Planning Area: Construct two four-bedroom single-family residences and retain 10 three-bedroom units (Platt Village) and one single-family residence (Missionary House), increasing the number of units in the planning area by 2 units.</li> <li>▶ Dormitory Hill Planning Area: Demolish existing dormitory buildings and construct a three-story senior housing building in residential care facility, described below (the Residential Care Facility).</li> <li>▶ Chapel Hill Planning Area: Construct two one-bedroom units, 25 two-bedroom units, nine three-bedroom units, and four four-bedroom units, providing a total of 40 units in the planning area.</li> <li>▶ Shuck Drive Knoll Planning Area: Construct 14 three-bedroom units, providing a total of 14 units in the planning area.</li> </ul>	<p>As shown on Figure 4-1, the project refinements would involve redistributing approximately 12 to 14 residential units from the formerly proposed three six-story residential buildings to modified buildings elsewhere in the Hodges/Shuck Planning Area.</p> <ul style="list-style-type: none"> <li>▶ The design refinements in the Chapel Hill Planning Area would involve the following: Chapel Hill Planning Area: As shown on Figure 4-1, the project refinements would involve redistributing approximately 8 to 10 residential units from the Hodges/Schuck Planning Area to modified buildings in the Chapel Hill Planning Area.</li> <li>▶ The design refinements in the Shuck Knoll Drive Planning Area would involve the following: Shuck Knoll Drive Planning Area: As shown on Figure 4-1, the project refinements would involve redistributing approximately 2 to 4 residential units from the Hodges/Schuck Planning Area to modified buildings in the Shuck Knoll Drive Planning Area.</li> <li>▶ The design refinements in the Dormitory Hill Planning Area would involve the following: Dormitory Hill Planning Area: Demolish the existing dormitory buildings and construct a residential care facility that would not exceed the height originally proposed under the proposed project.</li> </ul>
Residential Care Facility	▶ N/A	▶ A facility with a capacity of up to 170 residents in 100 independent living units and 50 assisted living/memory care residences	▶ The residential care facility would not exceed the height originally proposed under the proposed project
Recreation and Open Space	<ul style="list-style-type: none"> <li>▶ Open space resources throughout the project site</li> <li>▶ 2-acre Seminary Playing Field</li> </ul>	<ul style="list-style-type: none"> <li>▶ Maintain about 70 percent of the project site as undeveloped space</li> <li>▶ Add to the network of trails</li> <li>▶ Raise 2-acre Seminary Playing Field by approximately 25-30 feet to help balance onsite grading, resulting in a landscape berm along Seminary Drive. The elevated site would continue to be available as a playing field.</li> </ul>	▶ No refinements are proposed for this project element

Land Use	Existing Uses and Features	Proposed Project Components in the Draft and Final EIR	Proposed Project Refinements
Parking and Circulation	<ul style="list-style-type: none"> <li>▶ Private streets with no dedicated bicycle facilities</li> <li>▶ Approximately 608 parking spaces in a three-tiered parking lot and in lots adjacent to residential structures</li> </ul>	<ul style="list-style-type: none"> <li>▶ Approximately 944 parking spaces in three-tiered parking lot and underground garages in proposed residential structures and concealed garages in proposed duplexes               <ul style="list-style-type: none"> <li>▪ 51 existing residential spaces to remain</li> <li>▪ 467 spaces for new proposed residential development</li> <li>▪ 185 spaces for residential care facility</li> <li>▪ 241 spaces for academic campus</li> </ul> </li> <li>▶ Secure bicycle parking, trails and walkways, complete street elements, and Class III bike routes on interior streets</li> </ul>	<ul style="list-style-type: none"> <li>▶ No refinements are proposed for this project element</li> </ul>



Source: Image produced and provided by Cavagnero in 2016; Adapted by Ascent in 2026

**Figure 4-1 Conceptual Plan of Proposed Residential Unit Relocation**



## 4 EIR CONSISTENCY ASSESSMENT

This section documents the assessment of whether environmental impacts resulting from proposed project refinements would be consistent with the conclusions in the North Coast Land Holdings Project Draft and Final EIR; whether the proposed project refinements sustain an “accurate, stable, and finite” project description; and whether any of the circumstances described in State CEQA Guidelines Section 15088.5 requiring the recirculation of the Draft EIR would occur.

### 4.1 ENVIRONMENTAL REVIEW OF PROJECT REFINEMENTS

To determine the project refinements’ consistency with the North Coast Land Holdings Project EIR, the following questions were answered:

- ▶ Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?
- ▶ Do the proposed project refinements result in a new or substantially more severe significant impact?
- ▶ Do any changes in the environmental setting result in a new or substantially more severe significant impact?
- ▶ Do the proposed project refinements warrant revision to a mitigation measure?
- ▶ Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?

The approach to the consistency assessment uses a modified State CEQA Guidelines Appendix G checklist with column headings for each of the questions listed above. For each column heading, a “yes” or “no” answer would mean the following:

- ▶ *Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?* This question is answered with a “yes” or “no,” as substantiated by the discussion provided below the table. “Yes” is stated where the proposed project refinements are consistent with the basic project objectives and the types and density of project land uses, proposed buildings and roadways, proposed drainage infrastructure, and overall footprint and character of proposed buildings as originally evaluated in the North Coast Land Holdings Project EIR. Additionally, the intensity of the proposed project’s uses would not substantially change, as measured by total number of dwelling units, total number of assisted care beds, and size of the fitness/day care facility. A “No” is stated where the refinements would represent a degree of change sufficient to mislead the public, thwart the public’s ability to comment meaningfully on the project’s environmental impacts, or fail to support informed decision-making.
- ▶ *Do the proposed project refinements result in a new or substantially more severe significant impact?* This question is answered with a “yes” or “no,” as substantiated by the discussion provided below the table. If the response is “yes,” additional CEQA analysis is required.
- ▶ *Do any changes in the environmental setting result in a new or substantially more severe significant impact?* This question is answered with a “yes” or “no,” as substantiated by the discussion provided below the table. If the response is “yes,” additional CEQA analysis is required.
- ▶ *Do the proposed project refinements warrant revision to a mitigation measure?* This question is answered with a “yes,” “no,” or “N/A,” as substantiated by the discussion provided below the table. The answer “N/A” indicates there was no potential significant impact identified in the North Coast Land Holdings Project EIR and the project refinements do not change the impact conclusion. The North Coast Land Holdings Project EIR mitigation measures are summarized and cross referenced, in this consistency assessment.
- ▶ *Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?* This question is answered with a “yes” or “no,” as substantiated by the discussion provided below the table. If the response is “yes,” recirculation of the Draft EIR would be required regarding this impact topic.

## 4.1.1 Aesthetics

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Aesthetics Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Have a substantial adverse effect on a scenic vista?	Yes	No	No	N/A	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Yes	No	No	N/A	No
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Yes	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Yes	No	No	No	No

**a) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would conflict with applicable zoning and other regulations governing scenic quality in "Issues Not Discussed Further," of Section 3.1, "Aesthetics." The Draft EIR determined that the project would not block public views from any local or designated scenic vista points nor block views to any regional landmarks including Richardson Bay, San Francisco Bay, Mount Tamalpais, or from other bayside communities including San Francisco as seen from areas surrounding the project site. Therefore, no substantial adverse effect on a scenic vista would occur as a result of the proposed project and this topic was not addressed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical design of the proposed project that could affect scenic vistas. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still

involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. Additionally, as described in Section 2, "Project Description," of the Draft EIR, the overall design of the proposed project residential development would involve clustered one- to three-story multi-family residential buildings and homes and would be limited to 30 feet in height per Marin County Code 22.10.040. Thus, any residential building potentially modified to accommodate the redistributed 28 residential units would still be within the height limits evaluated in the North Coast Land Holding Project EIR and the Marin County Code. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. Maintaining building heights at or below those evaluated in the North Coast Land Holdings Project EIR would not result in new or substantially more severe significant impacts or warrant new or revised mitigation related to scenic vistas.

Recognizing the total number of dwelling units would not change and substantial differences in building heights would not occur, project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to scenic vistas and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to scenic resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway in "Issues Not Discussed Further," of Section 3.1, "Aesthetics." The Draft EIR determined that because there are no State scenic highways designated by the California Department of Transportation located near the project site (Caltrans 2022), the project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway, and no impact would occur. This topic was not addressed further in this Draft EIR.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

### **Consistency Assessment of Project Refinements:**

The project refinements would not alter the location of the proposed project. Thus, as with the proposed project, the project refinements would not affect any scenic resources within a State scenic highway. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to scenic resources with a State scenic highway and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to scenic resources with a State scenic highway, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would

not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would conflict with applicable zoning and other regulations governing scenic quality in Impact 3.1-1 of Section 3.1, "Aesthetics." The Draft EIR determined that key elements of the proposed project's development would affect its ability to conform to County policies related to color palette, bulk, and relationship to the project site's local ridgelines as seen from lower elevations. Thus, this impact was found to be potentially significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measures 3.1-1a through 3.1-1d to address this potentially significant impact. Implementation of Mitigation Measures 3.1-1a through 3.1-1d would ensure that the project would not conflict with applicable zoning and other regulations governing scenic quality by requiring the planting of vegetation to buffer and screen views, planting of fast-growing trees to mitigate sky-lining effects, and the use of light and slightly darker-valued earth-toned materials to reduce color contrast. With implementation of these mitigation measures, potentially significant impacts related to scenic quality would be reduced to less than significant.

#### **Consistency Assessment of Project Refinements:**

As discussed above, the project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical design of the proposed project that could conflict with applicable zoning and other regulations governing scenic quality. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and would result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. Additionally, as described in Section 2, "Project Description," of the Draft EIR, the overall design of the proposed project residential development would involve clustered one- to three-story multi-family residential buildings and homes and would be limited to 30 feet in height per Marin County Code 22.10.040. Thus, any residential building potentially modified to accommodate the redistributed 28 residential units would still be within the height limits evaluated in the North Coast Land Holding Project EIR and the Marin County Code. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would not alter the building materials or location of proposed buildings in the various planning areas and maintaining building heights at or below those evaluated in the North Coast Land Holdings Project EIR would not result in new or substantially more severe significant impacts or warrant new or revised mitigation related to scenic quality. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to scenic quality and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to scenic quality, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add

any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area in Impact 3.1-2 of Section 3.1, "Aesthetics." Although project implementation would result in an incremental increase in the amount of light on the project site, the project would adhere to the County's outdoor lighting standards, which require that lighting sources be designed and constructed in a manner that is consistent with Marin County's Design Review Standards and Development Code to avoid light spillage on adjacent properties and in private spaces. However, the project would include the use of high albedo surfaces, which could create solar reflectivity and glare that could affect daytime and nighttime views. Within the project site, use of high albedo coefficient materials may also potentially compromise outdoor thermal comfort, indoor thermal environments, and potentially affect nearby plant growth characteristics. Thus, this impact was found to be potentially significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measure 3.1-2 to address this potentially significant impact. The implementation of Mitigation Measure 3.1-2 would ensure that the reflectance coefficients for albedo materials would not exceed a maximum of 0.6. Implementation of Mitigation Measure 3.1-2 would reduce new sources of substantial glare that would otherwise adversely affect day or nighttime views in the area and would therefore reduce this impact to less than significant with mitigation.

#### **Consistency Assessment of Project Refinements:**

As discussed above, the project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical design of the proposed project that could affect light, glare, or nighttime views in the area. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would not alter the building materials or location of proposed buildings in the various planning areas and maintaining building heights at or below those evaluated in the North Coast Land Holdings Project EIR would not result in new or substantially more severe significant impacts or warrant new or revised mitigation related to light, glare, or nighttime views in the area. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to light, glare, and nighttime views and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to light, glare and nighttime views, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.2 Agricultural and Forestry Resource

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Agricultural & Forestry Resources Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Yes	No	No	N/A	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Yes	No	No	N/A	No
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Yes	No	No	N/A	No
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Yes	No	No	No	No
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Yes	No	No	N/A	No

#### a-e) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the proposed project would impact agricultural and forestry resources in Section 6.1, "Effects Found Not to be Significant." The project site is in an urban community. According to the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland Finder, the project site and surrounding area are designated as "Urban and Built-Up Land" and "Other Land" (Department of Conservation 2022a). In addition, no agricultural land use or zoning is present within or adjacent to the project site. Existing zoning of the project site is a mix of RMP-2.47 and BFC-RMP-2.47. The RMP-2.47 zoning designation indicates Residential, Multiple Planned District. The BFC zoning designation indicates a parcel's location in the Bayfront Conservation combining district. Also, there are no lands under Williamson Act contract within or adjacent to the project site (Department of Conservation 2022b). Moreover, there are no areas designated as forest land, timberland, or timberland production zones within, or in proximity to, the project site. Therefore, the Draft EIR determined there would be no impact on agriculture and forestry resources and this issue was not analyzed further.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would not alter the physical location of the proposed project. Thus, as with the proposed project, the project refinements would not result in impacts on agriculture and forestry resources. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to agricultural and forestry resources and project-level and cumulative impacts would not occur. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to agricultural and forestry resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### 4.1.3 Air Quality

#### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Air Quality Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Conflict with or obstruct implementation of the applicable air quality plan?	Yes	No	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Yes	No	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	Yes	No	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Yes	No	No	N/A	No

#### a-b) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would conflict with or obstruct implementation of the applicable air quality plan and result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment in Impacts 3.2-1 and 3.2-2, respectively, of Section 3.2, "Air Quality."

#### Generate Short-Term Construction-Related Emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>

Considering Bay Area Air Quality Management District's (BAAQMD) guidance, average daily construction-generated emissions were quantified for the project. The project would not generate construction emissions of ROG, PM10 exhaust, and PM2.5 exhaust exceeding BAAQMD's average daily mass emissions thresholds of significance. However, project construction would emit NOX emissions exceeding BAAQMD's mass emissions thresholds. Therefore, construction-related impacts would be potentially significant.

#### Generate Long-Term Operational Emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>

Considering BAAQMD's guidance, average daily operation-generated emissions were quantified for the project. The project would not generate operational emissions of criteria air pollutants and ozone precursors exceeding BAAQMD's average daily mass emissions thresholds of significance. Because operational emissions of criteria air pollutants and ozone precursors would be less than BAAQMD's daily mass emissions threshold, impacts would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:****Generate Short-Term Construction-Related Emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>**

The Draft EIR proposed Mitigation Measure 3.2-1 to address this potentially significant impact. Implementation of Mitigation Measure 3.2-1 would reduce the project's emissions of NO<sub>x</sub> exhaust by requiring the use of Tier 4 engines for construction equipment exceeding 50 hp, sufficiently reducing No<sub>x</sub> exhaust emissions to a less-than-significant level. Because BAAQMD's thresholds of significance are tied to long-term regional planning, the construction of the project, as mitigated, would not interfere with BAAQMD's future attainment of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for ozone, PM<sub>10</sub>, or PM<sub>2.5</sub>. Therefore, the project's mitigated construction emissions would not individually result in an adverse health outcome from exposure to air pollution. This impact would be less than significant with mitigation.

**Generate Long-Term Operational Emissions of ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to conflicting with or obstructing implementation of the applicable air quality plan and resulting in the generation of criteria pollutant emissions as the originally proposed project. The project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. The refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. Thus, construction activities associated with the refined project would not result in greater construction-related emissions of criteria pollutants than what was evaluated and disclosed in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, Mitigation Measure 3.2-1 would be required to reduce the refined project's emissions of NO<sub>x</sub> exhaust during construction.

In addition, the project refinements would include the stipulation that on-site campus enrollees in excess of 325 students are required to reside on the project site or be accommodated via online learning. Furthermore, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered to residents in the surrounding Strawberry neighborhood. Thus, the refined project would result in reduced trips as compared to the originally approved project, which would correlate to a reduction in operational emissions from mobile sources (e.g., vehicles).

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to applicable air quality plans or the generation of criteria pollutant emissions. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to applicable air quality plans and criteria pollutant emissions and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to applicable air quality plans and criteria pollutant emissions, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would expose receptors to substantial pollutant concentrations in Impact 3.2-3 of Section 3.2, "Air Quality." Based on the Health Risk Assessment (HRA) prepared for the project, construction of the project would produce significant diesel PM or other toxic air contaminants (TAC) such that BAAQMD's thresholds for TAC cancer risk exposure of 10 in 1 million or an acute or chronic Hazard Index of 1 for the maximally exposed individual (MEI) for non-carcinogens would be exceeded. Using these numerical thresholds established by BAAQMD, the project would generate substantial emissions of TACs causing an adverse health impact from TAC expose. This impact would be potentially significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measures 3.2-1 to address this potentially significant impact. Implementation of Mitigation Measure 3.2-1 would reduce the project's emissions of diesel PM by requiring the use of Tier 4 engines for construction equipment exceeding 50 hp. Implementation of Mitigation Measure 3.2-1 would reduce the project's incremental cancer risk to 5.69 in one million, which is below BAAQMD's recommended threshold of 10 in one million. This would reduce the impact to a less-than-significant level. This impact would be less than significant with mitigation.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to exposing receptors to substantial pollutant concentrations as the originally proposed project. The project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. The refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. Thus, construction activities associated with the refined project would not result in greater construction-related emissions of TACs than what was evaluated and disclosed in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, Mitigation Measure 3.2-1 would be required to reduce the project's emissions of diesel PM by requiring the use of Tier 4 engines for construction equipment exceeding 50 hp.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to exposing receptors to substantial pollutant concentrations. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to exposing receptors to substantial pollutant concentrations and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to exposing receptors to substantial pollutant concentrations, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people in Impact 3.2-4 of Section 3.2, "Air Quality." The project would introduce construction-related sources of odors; however, these sources would be intermittent and would disperse rapidly from the source. Construction-related odors would be subject to BAAQMD Regulation 7, which would reduce the potential for receptors to be exposed to odors. Given the temporary and intermittent nature of odor-generating

construction activities and coverage by BAAQMD's Regulation 7, construction of the land uses developed under the project would not expose a substantial number of people to objectionable odors for an extended period. Impacts would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to resulting in other emissions (such as those leading to odors) that would adversely affect a substantial number of people as the originally proposed project. The project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. Thus, the project refinements would not introduce any new or different uses than the originally proposed project that could generate other emissions (such as those leading to odors) that would adversely affect a substantial number of people,

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to odors. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to odors and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to odors, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.4 Biological Resources

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Biological Resources Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Yes	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	Yes	No	No	N/A	No
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Yes	No	No	N/A	No
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Yes	No	No	N/A	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Yes	No	No	N/A	No
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Yes	No	No	N/A	No

## **a) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in Impacts 3.4-1 through 3.4-5 in Section 3.4, "Biological Resources." The Draft EIR evaluated whether the project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance under Impacts 3.4-6 and 3.4-7 in Section 3.4 "Biological Resources."

### **Potential Disturbance or Loss of Special-Status Plants**

Project construction activities would result in ground disturbance in habitat potentially suitable for special-status plants, which could result in the crushing or removal of individual plants or damage to special-status plants due to construction dust, if these species are present. Additionally, ground disturbance for project components could cause the introduction and spread of invasive plants that could outcompete special-status plants for resources. Furthermore, construction of project components and associated landscaping would result in a loss of habitat suitable for special-status plants. The crushing, removal, and damage of special-status plants, introduction and spread of invasive plants, and loss of habitat due to implementation of the project would have the potential to substantially reduce the number of individuals and range of these species, which would be a potentially substantial adverse effect on the local and regional populations, and therefore this impact was found to be potentially significant.

### **Potential Disturbance or Loss of Monarch Butterfly**

Construction of the project and related activities may result in the injury, mortality, or disruption of reproduction of monarch butterfly. In addition, the modification of habitat used for overwintering by monarch butterfly may result in loss of this habitat suitability. This could substantially reduce the habitat for this species, cause the local populations of monarch butterfly to be reduced below locally self-sustaining levels, and substantially reduce the numbers of monarch butterfly. Therefore, the impact on monarch butterfly was found to be potentially significant.

### **Potential Disturbance or Loss of Special-Status Fish Species**

While the project would include grading and other ground disturbing activities, sediment control through the application of a required storm water pollution prevention plan and new storm drain systems would avoid discharge of contaminants to special-status fish habitat. Therefore, due to the lack of bay habitat within the project site, and the implementation of construction water quality best management practices as well as use of swales and other stormwater treatment techniques, the project would not substantially reduce the habitat for fish species, cause the population to drop below self-sustaining levels, threaten to eliminate a fishery, or substantially reduce the number of restrict the range of special-status fish. Therefore, the potential impact on special-status fishes was found to be less than significant.

### **Potential Disturbance or Loss of Special-Status Birds and Other Common Nesting Birds**

The adverse effects of project construction on common nesting birds would be avoided by the requirements of Marin County Code Section 22.20.040, which includes nesting season surveys, and non-disturbance buffers around nests. However, construction of the project and related activities may result in the injury, mortality, or disruption of reproduction of special-status birds. The nesting season for bald Eagle, California Ridgway's rail, and White-tailed kite extends beyond the nesting season requirements of Section 22.20.040, and the disturbance of bald eagle, California Ridgway's rail, and white-tailed kite nests may still occur with the implementation of the avoidance measures in the section. The loss of eggs and young would be a potentially substantial adverse effect on bald eagle, California Ridgway's rail, and white-tailed kite. Therefore, the impact of the proposed project on special-status birds was found to be potentially significant.

### **Potential Disturbance or Loss of Special-Status and Common Bat Maternity and Hibernation Roosts**

Construction of the project and related activities may result in the injury, mortality, or disruption of reproduction of special-status and common bat species through disturbance or loss of maternity and hibernation roosts. The loss of adult bats and pups may cause local bat populations to drop below self-sustaining levels, and may result in a substantial reduction in the local populations of special-status bat species. Therefore, the impact of the proposed project on special-status and common bats was found to be potentially significant.

### **Sensitive Natural Communities Identified by CDFW or USFWS**

Fuels management, grading, construction of new buildings, roads, trails, and other project components are not likely to adversely affect Monterey pine forest, California bay forest, needle grass – melic grass grassland or coyote brush scrub / (needle grass, blue wild rye, California brome). Therefore, the proposed project would not threaten to eliminate a plant community, and the impact from the proposed project on these sensitive natural communities was found to be less than significant.

### **Loss of Oakwoods**

Fuels management, grading, construction of new buildings, roads, trails, and other project components could spread sudden oak death into the project site and result in substantial loss of oak woodland, and threatens to locally eliminate this plant community, which was found to be a potentially significant impact.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

#### **Potential Disturbance or Loss of Special-Status Plants**

The Draft EIR proposed Mitigation Measures 3.4-1a and 3.4-1b to address this potentially significant impact. Mitigation Measure 3.4-1a requires protocol surveys prior to construction; avoidance of special-status plants when present on the project site; or if removal of special-status plants is unavoidable, the implementation of other measures to compensate for loss individual plants in a manner that avoids any net loss of sensitive habitat. Mitigation Measure 3.4-1b requires implementing measures to prevent the introduction and spread of invasive plants on the project site. Therefore, with the implementation of Mitigation Measures 3.4-1a and 3.4-1b, the impact to special-status plants would be reduced to less than significant with mitigation incorporated.

#### **Potential Disturbance or Loss of Monarch Butterfly**

The Draft EIR proposed Mitigation Measures 3.4-2a and 3.4-2b to address this potentially significant impact. The implementation of Mitigation Measure 3.4-2a and Mitigation Measure 3.4-2b would avoid and minimize adverse effects on monarch butterfly from the implementation of the proposed project by conducting monitoring for monarchs prior to construction, avoiding disturbance of overwintering monarch habitat during the overwintering period, and maintaining or improving the suitability of stands outside of the development footprint on the project site for overwintering monarchs. Therefore, with the implementation of Mitigation Measure 3.4-2a and Mitigation Measure 3.4-2b, the impact to monarch butterfly would be reduced to less than significant with mitigation incorporated.

#### **Potential Disturbance or Loss of Special-Status Fish Species**

No mitigation measures were required for this impact.

#### **Potential Disturbance or Loss of Special-Status Birds and Other Common Nesting Birds**

The implementation of Mitigation Measure 3.4-4 would avoid and minimize adverse effects on special-status birds from project implementation by avoiding the nesting season or conducting nest surveys and establishing non-disturbance buffers around active nests. Therefore, with the implementation of Mitigation Measure 3.4-4, the potential impact to special-status birds would be reduced to less than significant with mitigation incorporated.

#### **Potential Disturbance or Loss of Special-Status and Common Bat Maternity and Hibernation Roosts**

The Draft EIR proposed Mitigation Measure 3.4-5 to address this potentially significant impact. Implementation of Mitigation Measure 3.4-5 would avoid and minimize potential project-related disturbance to special-status and common bats by avoiding the maternity roosting and hibernation roosting seasons or conducting roost surveys and avoiding disturbance around active roosts (e.g., removal or pruning of trees, demolition of structures). Therefore, with implementation of Mitigation Measure 3.4-5, consistent with the scoping comments provided by CDFW the potential impact to special-status bats would be reduced to less than significant with mitigation incorporated.

### **Sensitive Natural Communities Identified by CDFW or USFWS**

No mitigation measures were required for this impact.

### Loss of Oakwoods

The Draft EIR proposed Mitigation Measure 3.4-7 to address this potentially significant impact. The implementation of Mitigation Measure 3.4-7 would avoid and minimize adverse effects on oak woodlands from the implementation of the proposed project by reducing the likelihood that sudden oak death would be introduced into the oak woodlands on the project site. Therefore, with the implementation of Mitigation Measure 3.4-7, the impact to oak woodlands would be reduced to less than significant with mitigation incorporated.

### Consistency Assessment of Project Refinements:

As discussed above, the project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical location, design, or overall disturbance area of the proposed project that could affect any species identified as a candidate, sensitive, or special status species. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would not alter the building materials or location of proposed buildings in the various planning areas and maintaining building heights at or below those evaluated in the North Coast Land Holdings Project EIR would not result in new or substantially more severe significant impacts or warrant new or revised mitigation related to species identified as a candidate, sensitive, or special status species.

Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to species identified as a candidate, sensitive, or special status species and project-level and cumulative impacts would remain less than significant for special-status fish species or sensitive natural communities. Regarding impacts on special-status plants; monarch butterfly; special-status birds and other common nesting birds; special-status and common bat maternity and hibernation roosts; and oak woodlands, the project refinements would also result in similar project-level and cumulative impacts as the proposed project and would require mitigation to reduce impacts on these biological resources to less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to species identified as a candidate, sensitive, or special status species, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use, intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would have a substantial adverse effect on any riparian habitat in "Issues Not Discussed Further" of Section 3.4 "Biological Resources." The project site does not contain any riparian habitat (Draft EIR Figure 3.4-1, "Land Cover on the Project Site"), nor is there riparian habitat directly adjacent to the project site. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat and this issue was not discussed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would not alter the location of the proposed project. Thus, as with the proposed project, the project refinements would not have a substantial adverse effect on any riparian habitat. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to riparian habitat and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to riparian habitat, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means under Impact 3.4-8 in Section 3.4 "Biological Resources." The project site contains 0.04 acre of the freshwater emergent wetland land cover type. Two of the three wet areas are located within the proposed disturbance area. An aquatic resources delineation has not been performed for the project site; therefore, the status of these wet areas as jurisdictional has not been formally established. Based on the size, isolation, and composition of the features within the disturbance area, these wetlands do not provide substantial water quality benefits or important habitat for wildlife, and the disturbance of these features would not constitute a substantial adverse effect; substantially reduce the habitat of a fish or wildlife species; or cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Therefore, the Draft EIR concluded that the proposed project would result in less than significant impacts.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would not alter the would not alter the physical location, design, or overall disturbance area of the proposed project. Thus, as with the proposed project, the project refinements would not constitute a substantial adverse effect on federally protected wetlands; substantially reduce the habitat of a fish or wildlife species; or cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to federally protected wetlands or other waters and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to federally protected wetlands and other waters, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North

Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would interfere substantially with wildlife movement and the use of native wildlife nursery sites under Impact 3.4-9 in Section 3.4 "Biological Resources." Impacts on disturbance or loss of special-status fish are discussed above in item 5.1.4(a) and impact on migratory fish are discussed above in item 5.1.4(c). The project site is unlikely to support regional wildlife movement corridors, and no habitat connectivity corridors are documented to occur on site. Therefore, the project is not likely to have a substantial adverse effect on wildlife movement through the project site. Use of the site as nursery habitat for shorebirds, marine mammals, and mule deer is unlikely given the existing and ongoing human disturbance on the project site. Thus, this impact was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

The project refinements would not alter the overall disturbance area or location of the proposed project. Thus, as with the proposed project, the project refinements would not interfere substantially with wildlife movement or the use of native wildlife nursery sites. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to wildlife movement and use of native wildlife nursery sites and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to wildlife movement and the use of native wildlife nursery sites, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **e) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance under Impact 3.4-10 in Section 3.4, "Biological Resources." The Marin Countywide Plan contains policies related to habitat for special-status species, sensitive natural communities, wildlife nursery areas and movement corridors, and woodland and forested habitats. The plan also contains policies related to invasive plants, plant pathogens, use of herbicides and insecticides, as well as restrictions on disturbance in sensitive habitat during nesting season. The potential for adverse effects on these resources are addressed in Impacts 3.4-1, 3.4-2, 3.4-4, and 3.4-5 mentioned above under 5.1.5(a). Policy BIO-3.1 of the Marin Countywide Plan includes buffers and other requirements for the protection of jurisdictional wetlands. Three wet areas do not appear to qualify as jurisdictional, so the requirements of Policy BIO-3.1 would not apply. The Marin County Code contains protections for certain trees. The proposed project would remove 89 protected trees and a tree removal permit and replacement of these trees would be required. The project would comply with all required

permits and policies, and for these reasons, implementation of the proposed project would not conflict with any local policies or ordinances and the impact was found to be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, or overall disturbance area of the proposed project. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would comply with all required permits and policies and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, the project refinements would not result in new or substantially more severe significant impacts or warrant new or revised mitigation related to local policies and ordinances protecting biological resources. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to local policies and ordinances protecting biological resources and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to local policies and ordinances protecting biological resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**f) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan in "Issues Not Discussed Further" of Section 3.4 "Biological Resources." The project site is not located within or adjacent to the plan area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved conservation plan. Therefore, the proposed project would not conflict with any established conservation plan and this issue was not discussed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would not alter the physical location of the proposed project. Thus, as with the proposed project, the project refinements would not be located within or adjacent to the plan area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved conservation plan. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to any established conservation plan and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to any established conservation plan, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.5 Cultural Resources

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Cultural Resources Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Yes	No	No	N/A	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Yes	No	No	No	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	Yes	No	No	N/A	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would cause a substantial adverse change in the significance of built-environment historical resources in Impact 3.3-1 of Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources." No new built-environment historical resources were identified as a result of surveys conducted on the project site. The Golden Gate Baptist Theological Seminary is recommended not eligible for listing in the National Register of Historic Places or California Register of Historical Resources. Because the property is not a historical resource pursuant to Section 15064.5, the North Coast Land Holdings Project EIR found no impact would occur.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

As mentioned above, the project refinements would not alter the physical location, design, or overall disturbance area of the proposed project. Thus, as with the proposed project, the project refinements would not affect a historical resource pursuant to Section 15064.5. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to historical resources and no project-level or cumulative impacts would occur. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to historical resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of

the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would cause a substantial adverse change in the significance of unique archaeological resources or historical resources of an archaeological nature in Impact 3.3-2 of Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources." Based on the records search, pedestrian survey, and subsurface testing conducted for the Draft EIR, one unique precontact archaeological site is located within the project site. Although project activities would avoid this site, it is possible that ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. Thus, the Draft EIR found this to be a potentially significant impact.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measure 3.3-2 to address this potentially significant impact. Implementation of Mitigation Measure 3.3-2 would reduce impacts associated with archaeological resources to a less-than-significant level because it would require the performance of professionally accepted and legally compliant procedures for the discovery and protection of previously undocumented significant archaeological resources (i.e., tribal cultural resources, unique archaeological resources, and historical resources of an archaeological nature).

#### **Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, or overall disturbance area of the proposed project. Additionally, the project refinements would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to archaeological resources and would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to archaeological resources and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to archaeological resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would disturb human remains in Impact 3.3-3 of Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources.". Based on documentary research, no evidence suggests that any precontact or historic-era marked or un-marked human interments are present within or in the immediate vicinity of the project site. However, ground-disturbing construction activities could uncover previously unknown human remains. Compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 would make this impact less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, or overall disturbance area of the proposed project. The project refinements would comply with all required polices related to discovery of human remains and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to disturbance of human remains and would not result in new or substantially more severe significant impacts or warrant mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to disturbance of human remains and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to disturbance of human remains, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.6 Energy

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Energy Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources, during project construction or operation?	Yes	No	No	N/A	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Yes	No	No	N/A	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would result in the wasteful, inefficient, or unnecessary consumption of energy during project construction or operation in Impact 3.5-1 of Section 3.5, "Energy." Implementation of the project would result in the consumption of additional energy supplies during construction in the form of gasoline and diesel fuel. However, this energy expenditure would not be considered wasteful, because construction would be temporary, and standard construction practices would be implemented. Project operations would result in additional energy consumption. The project would include various sustainability features including on-site photovoltaic solar systems to supply electricity to the project site as well as bicycle infrastructure for visitors and employees and design features to reduce the project's energy consumption. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy during project construction or operations. This impact would be less than significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

The project refinements would result in similar impacts related to the wasteful, inefficient, or unnecessary consumption of energy during project construction or operation as the originally proposed project. The project refinements would not result in any changes to the type or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. The refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. Thus, construction activities associated with the refined project would not result in greater construction-related energy consumption than what was evaluated and disclosed in the North Coast Land Holdings Project EIR.

In addition, the project refinements would include the stipulation that on-site campus enrollees in excess of 325 students are required to reside on the project site or be accommodated via online learning. Furthermore, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered to residents in the surrounding Strawberry neighborhood. Thus, the refined project would result in reduced trips, and thus vehicle miles

traveled (VMT), from the campus uses as compared to the originally proposed project, which would correlate to a reduction in operational energy consumption from mobile sources (e.g., vehicles).

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to the wasteful, inefficient, or unnecessary consumption of energy. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to the wasteful, inefficient, or unnecessary consumption of energy and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to the wasteful, inefficient, or unnecessary consumption of energy, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency in Impact 3.5-2 of Section 3.5, "Energy." The Marin County Climate Action Plan (CAP) recommends various project-level measures that have been applied to the project as a component of the project's inherent design. The incorporation of these policies demonstrates that the project would not conflict with the County of Marin's CAP. These measures are generally consistent with the direction provided to local governments in Appendix D of the 2022 Scoping Plan, which directs projects to reduce VMT, promote renewable energy, and provide electric vehicle (EV) charging meeting the Tier 2 requirements of the CalGreen Code. Therefore, the project would not conflict with the 2022 Scoping Plan. This impact would be less than significant.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency as the originally proposed project. As discussed above, the project refinements would not result in any changes to the type or amount of development that could occur on the project site compared to the originally proposed project. The refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. Thus, the refined project would include the same project-level measures from the Marin County CAP that would reduce energy demand and increase the County's capacity to generate renewable resources as the originally proposed project. The include providing EV infrastructure for residential and nonresidential development (CAP Measure LCT-C1, "Zero Emission Vehicles") installing bicycle infrastructure to promote alternate modes of transportation to the project site (CAP Measure LC-C2, "Bicycling and Micromobility"), and installing on-site PV solar systems to supply renewable energy to the project site (CAP Measure RE-C1, "Renewable Energy Generation and Storage"), among others. In addition, the project refinements requiring on-site campus enrollees in excess of 325 students to reside on the project site or be accommodated via online learning and limiting the daycare and fitness center to individuals who live or work on-site would result in result in reduced trips, and thus VMT, from the campus uses as compared to the originally proposed project, which would correlate to a reduction in operational energy consumption from mobile sources (e.g., vehicles).

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to state or local plan for renewable energy or energy efficiency. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to state or local plan for renewable energy or energy efficiency and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to state or local plan for renewable energy or energy efficiency, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.7 Geology, Soils, and Seismicity

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Geology, Soils, & Seismicity Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Yes	No	No	N/A	No
ii) Strong seismic ground shaking?	Yes	No	No	N/A	No
iii) Seismic-related ground failure, including liquefaction?	Yes	No	No	No	No
iv) Landslides?	Yes	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	Yes	No	No	N/A	No
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	Yes	No	No	No	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Yes	No	No	N/A	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Yes	No	No	N/A	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Yes	No	No	N/A	No

**a,i) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would Directly or indirectly cause potential substantial adverse effects due to surface earthquake fault rupture in "Issues Not Discussed Further," of Section 3.6, "Geology and Soils." The project site is not located within an Alquist-Priolo Earthquake Fault Zone, and none of the regional maps or project documents indicate the presence of any active or potentially-active faults within or in immediate proximity to the site. This issue was not discussed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project that could affect an Alquist-Priolo Earthquake Fault Zone or other potentially-active faults within or in immediate proximity to the site. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would not alter the building materials or location of proposed buildings in the various planning areas and maintaining building heights at or below those evaluated in the North Coast Land Holdings Project EIR would not result in new or substantially more severe significant impacts or warrant new or revised mitigation related an Alquist-Priolo Earthquake Fault Zone or other potentially-active faults within or in immediate proximity to the site.

Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to rupture of a known earthquake fault and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to rupture of a known earthquake fault, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**a,ii) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would directly or indirectly cause potential substantial adverse impacts to structures or people, including the risk of loss, injury, or death, through seismic ground shaking in Impact 3.6-1 of Section 3.6, "Geology and Soils." Strong seismic ground shaking would expose structures and occupants to potential adverse effects including risk of loss, injury, or death. Several active fault systems, including the San Andreas, San Gregorio, Hayward-Rodgers Creek, and others, lie in close proximity to the project site and are likely to generate strong seismic ground shaking during the expected design life of the project. However, the proposed project would not cause any change in the risk of loss of life or injury, because it would not exacerbate the existing environmental

hazard and would adhere to California Building Code (CBC) and Marin County Code requirements. This conclusion is provided for informational purposes but is not within the purview of CEQA for a determination of impact significance.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. Thus, as with the proposed project, the project refinements would not cause any change in the risk of loss of life or injury, because it would not exacerbate the existing environmental hazard and would adhere to CBC and Marin County Code requirements. This assessment is provided for informational purposes but is not within the purview of CEQA for a determination of impact significance, and does not affect the accuracy or stability of the proposed project description.

**a,iii) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would directly or indirectly cause potential substantial adverse impacts to structures or people, including the risk of loss, injury, or death, through seismically-induced ground/structural failure including slope instability, liquefaction, and lateral spreading in Impact 3.6-2 of Section 3.6, "Geology and Soils." Due to the presence of areas mapped within the project site as "fill," "colluvium," and "earthflows," as well as, areas regionally mapped with steep slopes, bay mud, or as potentially liquefiable, seismically induced ground failure is an existing environmental condition and has the potential to occur within the effective design life of the project, which would expose structures and occupants to adverse effects potentially including risk of loss, injury, or death. Several active fault systems, including the San Andreas, San Gregorio, Hayward-Rodgers Creek, and others, lie in close proximity to the project site and have the potential to induce ground failure during the expected design life of the project. The construction of the new playfield and bioretention and stormwater dissipation facilities would be located within or proximal to previously mapped areas of instability (Draft EIR Figure 3.6-2, "Relative Slope Stability") and thus could exacerbate potential risks associated with this instability from seismically induced ground failure. Additionally, new cut and fill slopes, as well as the discharge of additional storm water can reduce slope stability which would increase the potential for seismically induced instability and lateral displacements. Thus, the proposed project could exacerbate existing environmental hazards related to seismically-induced ground failure resulting in exposure of structures and occupants to risk of loss, injury, or death. Thus, impacts were found to be potentially significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measure 3.6-2 to address this potentially significant impact. Implementation of Mitigation Measure 3.6-2 would at least maintain the risk of seismically induced ground failure resulting from potential lateral spreading or greater instability caused by the project at pre-project levels and may reduce the risk. The measure would also result in definition of construction requirements needed to meet building code criteria and the recommendations outlined in the 2010 and 2016 (Purcell, Rhoades & Associates) (PRA) reports, which are intended to prevent structural collapse and risk of loss, safety, and death. The basic requirement is that new structures should withstand ground movement from a minor earthquake without damage; from a moderate earthquake without structural damage; and from a major earthquake without collapse. It is acknowledged that the potential for seismically induced ground failure impacts cannot be entirely eliminated even with site-specific geotechnical investigations and building requirements. Repairing or improving areas of instability by incorporating design features such as those mentioned in Mitigation Measure 3.6-2 (retaining walls, surface and subsurface drainage features, soil stabilization techniques, creating terraces or stepped slopes, slope contouring, and replanting of stabilizing vegetation) would reduce the project's potential to exacerbate existing environmental hazards related to seismically induced ground failure. Therefore, implementation of Mitigation Measure 3.6-2 would reduce impacts related to seismically induced ground failure to a less-than-significant level.

**Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. Additionally, the project refinements would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to seismically-induced ground/structural failure including slope instability, liquefaction, and lateral spreading and would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to seismically-induced ground/structural failure including slope instability, liquefaction, and lateral spreading and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to seismically-induced ground/structural failure including slope instability, liquefaction, and lateral spreading, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**a,iv) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would directly or indirectly cause potential substantial adverse impacts to structures or people, including the risk of loss, injury, or death through slope instability/landsliding in Impact 3.6-4 of Section 3.6, "Geology and Soils." Slope instability and landsliding are common throughout Marin County. Existing landslides and other potentially unstable deposits (weak colluvial soils) underlie various portions of the project site, including areas which have been historically filled. Application of new fill soil or building loads, grading and alteration of slopes, and redirection or alteration of existing drainage patterns could exacerbate/re-activate existing areas of slope instability or generate new slope instability. Thus, impacts related to slope instability and landsliding were found to be potentially significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measure 3.6-4 to address this potentially significant impact. Implementation of Mitigation Measure 3.6-4 would at least maintain the risk of slope instability/landsliding resulting from project implementation to pre-project levels and may reduce the risk. The measure would also define the geotechnical design requirements needed to meet the goals and policies of the Marin Countywide Plan's Environmental Hazards Element, and requirements of the Marin County Code, Section 22.100.040, which are intended to prevent structural collapse and protect life safety. Repairing or improving areas of instability by incorporating design features such as those mentioned in Mitigation Measure 3.6-4 (excavation of unstable material, construction of retaining structures, de-watering with subsurface drainage) would reduce slope instability/landsliding impacts to a less-than-significant level.

**Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. Additionally, the project refinements would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to slope instability/landsliding and would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to slope

instability/landsliding and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to slope instability/landsliding, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would result in substantial soil erosion in Impact 3.6-3 of Section 3.6, "Geology and Soils." Erosion would occur throughout the design life of the project as a result of natural rainfall, sloping site conditions, and exposed surface soils. Erosion may be exacerbated by alteration of natural drainage patterns, local concentration of stormwater runoff, denudement of previously-vegetated slopes, or site grading. However, the erosion factor (or K value) for the project site ranges from 0.28 to 0.32. Therefore, the susceptibility of soil to erosion and the rate of runoff is considered relatively low. While the greatest risk of erosion would be during construction, requirements to comply with the Construction General Permit and Section 23.18 of the Marin County Code, which requires the development of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMP), would decrease the potential for erosion. Additionally, the project would include a storm drain system and all disturbed areas would be stabilized per permit conditions which would minimize the risk of erosion during project operations. Therefore, this impact would be less than significant.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

### **Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. The project refinements would comply with all Construction General Permit, Marin County Code, and Bay Area Stormwater Management Agencies Association (BASMAA) post-construction manual requirements including preparation of a SWPPP as well as inspection and reporting, and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to soil erosion and would not result in new or substantially more severe significant impacts or warrant mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to soil erosion and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to soil erosion, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add

any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would locate project facilities on a geologic unit that is unstable or that would become unstable as a result of subsidence under Impact 3.6-6 in Section 3.6, "Geology and Soils." Impacts related to lateral spreading, liquefaction, slope instability and landsliding are discussed above under Sections 5.1.7(a.iii) and (a.iv). Subsidence as a result of natural processes, such as groundwater/subsurface resource withdrawal or bedrock dissolution, is not likely within the development area. Subsidence can also occur where new loads are applied to compressible soils, such as bay mud. The bay mud areas on the project site are limited to near the shoreline area, as well as the southern edge of the planned playfield. Subsidence may also occur as a result of differential settlement where new loads are applied across a transition between geologic materials of differing support characteristics. While the greatest risk of subsidence would occur post construction, requirements to comply with Marin County Code and CBC would decrease the potential for subsidence. Such compliance with regulatory requirements would ensure that the potential for subsidence would not change as a result of implementation of the project. Therefore, the impact would be less than significant.

#### **Summary of Mitigation Measures:**

No mitigation measures were required for impacts related to a geologic unit that is unstable or that would become unstable as a result of subsidence.

See Sections 5.1.7(a.iii) and (a.iv) above for mitigation measures related to lateral spreading, liquefaction, slope instability and landsliding.

#### **Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. The project refinements would comply with all applicable requirements of the Marin County Code and the California Building Code, and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to unstable soils and subsidence and would not result in new or substantially more severe significant impacts or warrant mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to unstable soils and subsidence and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to unstable soils and subsidence, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

See Sections 5.1.7(a.iii) and (a.iv) above for the consistency assessment related to lateral spreading, liquefaction, slope instability and landsliding.

### **d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would locate project facilities on expansive soils in Impact 3.6-5 of Section 3.6, "Geology and Soils. Expansive soils may be locally present at the site. Where utilized for new fill slopes, expansive soils can cause lateral extension and settlement, and where present at subgrade in flat-lying areas can cause differential heave/settlement of foundations, flatwork, pavements, drainage facilities, and other surface improvements, all of which could present some risk of loss, injury, or property damage. However, the proposed project would not exacerbate an existing environmental hazard and would adhere to CBC and Marin County Code requirements, therefore, impacts related to expansive soils were found to be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. The project refinements would comply with all applicable requirements in Marin County Code Section 22.100.040 and the California Building Code, and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to expansive soils and would not result in new or substantially more severe significant impacts or warrant mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to expansive soils and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to expansive soils, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**e) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in "Issues Not Discussed Further" of Section 3.6, "Geology and Soils." The campus is currently served by the Richardson Bay Sanitation District and is connected to the existing infrastructure. This would not change for the proposed project, and the proposed project does not propose to use septic or alternative wastewater disposal systems. Therefore, no impact would occur as a result of implementation of the proposed project related to the use of septic tanks or alternative wastewater disposal systems and this issue was not discussed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location of the proposed project. Thus, as with the proposed project, no impact would occur as a result of project refinements related to the use of septic tanks or alternative wastewater disposal systems. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to septic tanks or alternative wastewater disposal systems and project-level and cumulative impacts would continue to not occur. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to septic tanks or alternative

wastewater disposal systems, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and findings of the North Coast Land Holdings Project EIR.

#### **f) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature unique under Impact 3.6-7 and in "Issues Not Discussed Further" of Section 3.6, "Geology and Soils." Paleontological resources are the fossilized remains or impressions of plants and animals, including vertebrates, invertebrates, and microscopic plants and animals. Fossils can be used to determine the relative ages of the depositional layers in which they occur and of the geologic events that created those deposits. The proposed project would involve extensive subsurface disturbance that could potentially encounter and damage previously undiscovered buried paleontological resources. The Franciscan Complex found at the project site is unlikely to contain identifiable fossils due to the pulverized nature of the unit. It should be noted that there are three known invertebrate fossils from the Franciscan Complex in Marin County (UCMP 2023). In the event of an unanticipated discovery of paleontological resources, the project would be required to comply with County Code 22.20.040. Therefore, impacts associated with the potential for disturbance of paleontological resources would be less than significant.

Regarding unique geologic features, rock outcrops in the project area are sparse except where exposed in cut slopes (Draft EIR Appendix L). None of these outcrops exhibit unique features that differ from the surrounding geology and therefore were not discussed further in the Draft EIR.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, grading plans, or overall disturbance area of the proposed project. The project refinements would comply with County Code 22.20.040, and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to a paleontological resource or site or unique geologic feature and would not result in new or substantially more severe significant impacts or warrant mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to a paleontological resource or site or unique geologic feature and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to a paleontological resource or site or unique geologic feature, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.8 Greenhouse Gas Emissions and Climate Change

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Greenhouse Gas Emissions Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Yes	No	No	No	No
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose or reducing the emissions of greenhouse gases?	Yes	No	No	No	No

#### a-b) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment and conflict with an applicable plan, policy, or regulation adopted for the purpose or reducing the emissions of GHGs in Impact 3.7-1 of Section 3.7, "Greenhouse Gas Emissions and Climate Change Vulnerability." Implementation of the proposed project would result in construction- and operation-related GHG emissions that could contribute to climate change on a cumulative basis. The project would not be fully electric per BAAQMD's recommendations or CARB's recommendations in Appendix D of the 2022 Scoping Plan, the nonresidential components of the project would not include BAAQMD's recommended standards for EV charging meeting the Tier 2 requirements of the CalGreen Code, and the project would not meet the VMT reduction targets of SB 743. Thus, the project does not demonstrate that it would be doing its "fair share" in assisting the state in meeting its long-term goal of carbon neutrality by 2045. Therefore, the project's emissions of GHGs would be potentially significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

The Draft EIR proposed Mitigation Measures 3.7-1a and 3.7-1b to address this potentially significant impact. Implementation of Mitigation Measure 3.7-1a would require the provision of the necessary EV charging infrastructure for the electrification of the state's mobile source sector. Mitigation Measure 3.7-1b would provide the applicant with the flexibility to either construct the project without natural gas infrastructure (i.e., fully electric), or at a minimum have all-electric appliances and, under specific circumstances, rely on carbon offsets as a mechanism to close the gap of GHG emissions generated from natural gas combustion through a qualified offset registry. However, it cannot be assured at this time that Mitigation Measure 3.7-1b is feasible. In addition, Mitigation Measure 3.14-2a would require the project applicant to implement a Transportation Demand Management (TDM) Program for the proposed market rate residential and the dedication of housing to campus-affiliated residents. However, it cannot be assured that implementation of these mitigation measures would be sufficient to achieve the required VMT reduction target. Therefore, the project's contribution of GHGs would conflict with the 2022 Scoping Plan. This impact would be significant and unavoidable.

#### Consistency Assessment of Project Refinements:

The project refinements would result in similar impacts related to generating GHG emissions and conflicting with an applicable GHG emission reduction plan, policy, or regulation as the originally proposed project. The project

refinements would not result in any changes to the type or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. The refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. Thus, construction activities associated with the refined project would not result in greater construction-related GHG emissions than what was evaluated and disclosed in the North Coast Land Holdings Project EIR.

In addition, the project refinements would include the stipulation that on-site campus enrollees in excess of 325 students are required to reside on the project site or be accommodated via online learning. Furthermore, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered to residents in the surrounding Strawberry neighborhood. Thus, the refined project would result in reduced trips and VMT as compared to the originally approved project, which would correlate to a reduction in operational GHG emissions from mobile sources (e.g., vehicles). Despite this reduction in transportation-related GHG emissions, the refined project would not be fully electric per BAAQMD's recommendations or CARB's recommendations in Appendix D of the 2022 Scoping Plan, the nonresidential components of the project would not include BAAQMD's recommended standards for EV charging meeting the Tier 2 requirements of the CalGreen Code, and the project would not meet the VMT reduction targets of SB 743. Similar to the originally proposed project, Mitigation Measures 3.7-1a, 3.7-1b, and 3.14-2a would be required to reduce the refined project's GHG emissions. However, similar to the originally proposed project, it cannot be assured that implementation of these mitigation measures would be sufficient to achieve the required VMT reduction target in accordance with the 2022 Scoping Plan.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to generating GHG emissions and conflicting with an applicable GHG emission reduction plan, policy, or regulation. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to generating GHG emissions and conflicting with an applicable GHG emission reduction plan, policy, or regulation and project-level and cumulative impacts would continue to be significant and unavoidable. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to generating GHG emissions and conflicting with an applicable GHG emission reduction plan, policy, or regulation, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.9 Hazards and Hazardous Materials

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Hazards & Hazardous Materials Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Yes	No	No	N/A	No
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Yes	No	No	N/A	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Yes	No	No	N/A	No
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Yes	No	No	N/A	No
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?	Yes	No	No	N/A	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Yes	No	No	N/A	No

**a) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in Impact 3.8-1 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." Construction activities for the proposed project would involve the routine transport, use, and disposal of hazardous materials typically used in construction, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. All hazardous materials would be transported, used, stored, handled, and disposed of

according to the manufacturers' recommendations and in accordance with local, State, and federal regulations and plans. Further, the project would not result in any changes to campus operations, and the use and transport of any hazardous materials on the campus for academic purposes (e.g., science labs) would continue to comply with all hazardous materials standards and would occur under the oversight of the Marin County Public Works Department, the Certified United Programs Agency (CUPA) in Marin County. This impact would be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to the routine transport, use, or disposal of hazardous materials as the originally proposed project. The refined project would not result in any changes in the magnitude of construction that would occur on the project site; thus, there would be no change in the amount of typical construction-related hazardous materials that would be used. Similar to the originally proposed project, all hazardous materials used during construction of the refined project would be transported, used, stored, handled, and disposed of according to the manufacturers' recommendations and in accordance with local, State, and federal regulations and plans. Although the project refinements would limit the number of onsite campus enrollees to 325 students, the refined project would not result in any change in the nature of campus operations compared to the originally proposed project. Campus operations associated with the refined project would continue to comply with all hazardous materials standards and would occur under the oversight of the Marin County Public Works Department, the CUPA in Marin County.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to routine transport, use, or disposal of hazardous materials. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to the routine transport, use, or disposal of hazardous materials and project-level and cumulative impacts would continue to be less than significant. Additionally, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to the routine transport, use, or disposal of hazardous materials, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment in Impact 3.8-2 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." There are no known sites with contamination on or near the project site identified on California State Water Resources Control Board's (SWRCB) GeoTracker or California Department of Toxic Substances Control's (DTSC) EnviroStor databases. Additionally, the project site was not identified on any other databases searched as part of the Phase I Environmental Site Assessment (ESA). However, asbestos containing materials, lead based paint, lead containing material, mercury switches and fluorescent tubes, and polychlorinated biphenyl light ballasts were all identified as non-recognized environmental conditions (REC) that are potentially present on the project site. As such, the demolition and renovation of existing structures could result in the release of these materials into the environment. Compliance with applicable regulations would ensure that these materials would be handled and disposed of properly and would not create a significant hazard to the public or the environment. This impact would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to upset or accident conditions involving the release of hazardous materials into the environment as the originally proposed project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. As such, they would not be located on a hazardous materials site identified in any regulatory database, including the SWRCB's GeoTracker or DTSC's EnviroStor databases. In addition, the project refinements would not result in the demolition of any additional or different existing buildings than the originally proposed project, and thus would not have the potential to encounter hazardous materials beyond those identified and evaluated in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, compliance with applicable regulations would ensure that any hazardous materials present in existing buildings would be handled and disposed of properly and would not create a significant hazard to the public or the environment.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to hazardous materials. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to upset or accident conditions involving the release of hazardous materials into the environment and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to the release of hazardous materials into the environment, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school in "Issues Not Discussed Further" of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." There are no existing or proposed K-12 schools within 0.25-mile of the project site. The proposed project does not involve the development of any uses that would emit or handle acutely hazardous materials, substances, or wastes. The routine transport, use, and disposal of common hazardous materials would occur in accordance with applicable local, State, and federal regulations. In addition, the project does not propose any land use types that would generate long-term operational emissions of toxic air contaminants. Therefore, this issue was not discussed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school as the originally proposed project. The project refinements would not result in any changes to the type or

amount of development that could occur on the project site compared to the originally proposed project. Similar to the originally proposed project, the refined project does not involve the development of any uses that would emit or handle acutely hazardous materials, substances, or wastes. The routine transport, use, and disposal of common hazardous materials associated with the project refinements would occur in accordance with applicable local, State, and federal regulations. In addition, the project refinements do not propose any land use types that would generate long-term operational emissions of toxic air contaminants.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to upset or accident conditions involving the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste and there would continue to be no project-level or cumulative impact. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment in "Issues Not Discussed Further" of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." Neither SWRCB's GeoTracker nor DTSC's EnviroStor databases identified sites of known contamination on or near the project site (SWRCB 2023; DTSC 2023). Additionally, the project site was not identified on any other databases searched as part of the Phase I ESA prepared for the proposed project, nor did the Phase I ESA identify any RECs, controlled RECs, or historical RECs on the project site or surrounding area. For these reasons, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and there is no potential to create a significant hazard to the public or the environment. Therefore, this issue was not discussed further in the Draft EIR.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to creating a significant hazard to the public or the environment from being located on a site included on a list of hazardous materials sites as the originally proposed project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. As such, they would not be located on a hazardous materials site identified in any regulatory database, including the SWRCB's GeoTracker or DTSC's EnviroStor databases.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to creating a significant hazard to the public or the environment from being located on a site included on a list of hazardous materials sites. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to being located on a site included on a list of hazardous materials sites and there would continue to be no project-level or cumulative impact. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to creating a significant hazard to the public or the environment from being located on a site included on a list of hazardous materials sites, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **e) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, whether the project would result in a safety hazard for people residing or working in the project area in Impact 3.8-3 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." The project site is not located within the airport land use plan (ALUC) for Gness Airfield or within 2 miles of a public airport or public use airport. However, the privately owned and operated Commodore Center Heliport and Commodore Center Seaplane Base are both located approximately 0.4-mile southwest of the project site. Because private airports are not required to prepare land use plans and the Marin County ALUC authority is limited to Gness Airfield, the proposed project has the potential to result in airport safety hazards associated with the Commodore Center Heliport and Commodore Center Seaplane Base. Compliance with Federal Aviation Administration (FAA) notification requirements would ensure that the project would not result in any air safety hazards. This impact would be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts associated with airport-related safety hazards as the originally proposed project. The project refinements would not result in any changes to the type or amount of development that could occur on the project site compared to the originally proposed project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. In addition, because the project refinements would result in reduced building heights compared to the originally proposed project, the refined project would slightly reduce potential obstruction-related safety hazards associated with the Commodore Center Heliport and Commodore Center Seaplane Base compared to the originally proposed project. However, similar to the originally proposed project, compliance with FAA notification requirements would still be required for the refined project and would ensure that the project refinements would not result in any air safety hazards.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation associated with airport-related safety hazards. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the

North Coast Land Holdings Project EIR associated with airport-related safety hazards and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to airport-related safety hazards, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **f) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan in Impact 3.8-4 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." Construction of the proposed project could temporarily obstruct or interfere with emergency response due to the presence of large construction equipment or the temporary, partial closure of roadways during certain construction activities. However, participants in construction activities would be subject to Section 3310.1 of the 2019 California Fire Code, which identifies minimum requirements to provide required emergency access during construction activities. Additionally, the proposed project does not include any components that would impair or interfere with the use of existing emergency notification systems or tools in the event of an emergency, nor would it impede the ability of first responders to implement the Operational Area Emergency Operations Plan (EOP) or Multi-Jurisdictional Local Hazard Mitigation Plan (MLHMP). Therefore, this impact would be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts associated with impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan as the originally proposed project. The project refinements would not result in any changes to the type or amount of development that could occur on the project site compared to the originally proposed project. Although the project refinements would result in a slight redistribution of residential units throughout the project site, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, construction of these relocated units would be subject to compliance with Section 3310.1 of the 2019 California Fire Code, which identifies minimum requirements to provide required emergency access during construction activities.

In addition, similar the originally proposed project, the refined project does not include any components that would impair or interfere with the use of existing emergency notification systems or tools in the event of an emergency, nor would it impede the ability of first responders to implement the Operational Area EOP or MLHMP. Furthermore, the project refinements would not result in any permanent roadway closures or changes in circulation patterns that could affect emergency response or impair implementation of emergency response or evacuation plans, similar the originally proposed project.

Finally, evacuation for the refined project would use the same routes identified in the EIR, including Seminary Drive. The project refinements include the stipulation that on-site campus enrollees in excess of 325 students are required to reside on the project site or accommodated via online learning. Additionally, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered to residents in the surrounding Strawberry

neighborhood. Thus, the refined project would result in reduced trips as compared to the originally proposed project and fewer people on the peninsula at any given time, because fewer students and fitness center/daycare patrons would commute to and from the project site. This would result in a reduction in vehicles requiring evacuation on Seminary Drive and other potential evacuation routes on the peninsula.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation associated with emergency response or evacuation plans. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to emergency response or evacuation plans and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to emergency response or evacuation plans, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### 4.1.10 Hydrology and Water Quality

#### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Hydrology & Water Quality Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Yes	No	No	N/A	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Yes	No	No	N/A	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:					
i) result in substantial erosion or siltation on- or off-site;	Yes	No	No	N/A	No
ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site; or	Yes	No	No	N/A	No
iii) create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	Yes	No	No	N/A	No
iv) impede or redirect flood flows?	Yes	No	No	N/A	No
d) In flood hazard, tsunami, or seiche zones, and risk release of pollutants due to project inundation?	Yes	No	No	N/A	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Yes	No	No	N/A	No
f) Exacerbate any Existing and/or Projected Damage to the Environment, Including Existing Structures, Human Health, and Sensitive Resources, Associated with Reasonably Foreseeable Future Sea Level Rise and Peak High Tides?	Yes	No	No	N/A	No

## a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality in Impact 3.9-1 of Section 3.9 "Hydrology." Although development of the proposed project has the potential to diminish water quality within the project site and in Richardson Bay, standard construction requirements would protect local and regional water quality. Vegetation clearing, grading, and excavation increase the potential for erosion and sedimentation. Also, the use of equipment during construction could cause spills or leaks of fuel, oil, and other fluids. Wet areas with hydric vegetation have been identified in the project site, which could experience construction related water quality impacts. Once constructed, the project site would be stabilized and would not degrade water quality. The origin of standard construction requirements for the proposed project would be from compliance with Marin County Grading Code Chapter 23.18 and the California Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ), including implementation of a stormwater pollution prevention plan and best management practices. These measures would avoid the potential for construction to substantially degrade water quality. Thus, impacts on water quality were found to be less than significant.

### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

### Consistency Assessment of Project Refinements:

As mentioned above, the project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project that could affect surface or groundwater quality. Project refinements related to the residential uses would reduce the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories and could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would comply with Marin County Grading Code Chapter 23.18 and the California Construction General Permit, including implementation of a stormwater pollution prevention plan and best management practices, and would not alter the building materials or location of proposed buildings in the various planning areas and maintain building heights at or below those evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to surface and groundwater quality and would not result in new or substantially more severe significant impacts or warrant new or revised mitigation.

Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to surface and groundwater quality and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to surface and groundwater quality, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin in Impact 3.9-2 of Section 3.9 "Hydrology." The proposed project is not located in a groundwater basin and groundwater resources are not extracted from beneath the project site. The proposed project would be served by Marin Municipal Water District, which sources its water from surface water and would not deplete groundwater resources. Although the proposed project would increase impervious surfaces by approximately 5.3 acres over current conditions, bioretention areas and stormwater detention tanks are proposed onsite to allow for the infiltration of stormwater throughout the project site, retaining groundwater recharge opportunities. For these reasons, implementing the proposed project was found to have a less-than-significant impact on groundwater resources and recharge.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project. Additionally, the project refinements would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to groundwater supplies and groundwater recharge, and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to groundwater supplies and groundwater recharge, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off- site; substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site; or create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff in Impact 3.9-3 of Section 3.9, "Hydrology." There are no streams or rivers in the project site. The proposed storm drain system incorporates stormwater bioretention and detention as required by Marin County Code (Sections 24.04.520 and 24.04.627) and BASMAA. While the proposed project would increase impervious area and alter the existing storm drain system, which would change the rate and timing of stormwater drainage and could result in erosion, siltation, flooding, and exceedance of adjacent storm drain systems and drainageways, compliance with the standard requirements of county ordinance requirements would avoid substantial changes. These storm water management measures would detain stormwater runoff and maintain flow rates such that post-project peak runoff flow rates would be less than pre-project levels (CSW|ST2 2021). Therefore, the

proposed project would not result in substantial off-site erosion, flooding, or contribute runoff that would exceed existing storm drain systems. Thus, this impact was found to be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project. Additionally, the project refinements would comply with all applicable requirements of the Marin County Code and BASMAA, and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would not result in substantial off-site erosion, flooding, or contribute runoff that would exceed existing storm drain systems. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to drainage patterns, and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to drainage patterns, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would result in flood hazards, tsunami, or seiche zones, and risk release of pollutants due to project inundation in Impact 3.9-4 of Section 3.9, "Hydrology." The project site is not located in a mapped Federal Emergency Management Agency (FEMA) flood zone and is not located in a dam failure inundation area. In addition, the project site would not have a potential for being inundated by a tsunami or seiche, though low-lying areas adjacent to the site including Seminary Drive could be inundated by tsunami (Draft EIR Appendix J). Because the project is not located in a mapped FEMA flood zone or dam inundation area and is located above the area that could be impacted by a tsunami or seiche, the risk of release of pollutants from flooding were found to be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project. Additionally, the project refinements would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in less than significant impacts related to the risk of release of pollutants from flooding. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to the risk of release of pollutants from flooding, and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to risk of release of pollutants from flooding, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**e) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan in Impact 3.9-5 of Section 3.9, "Hydrology." The proposed project would adhere to all applicable plans, permits, and regulations regarding water quality, and would not require the use of groundwater. During construction and operation, the proposed project would comply with the Marin County Code Chapter 23.18, the Construction General Permit, as well as all SWPPP requirements including temporary and permanent BMPs. Further, the implementation of stormwater bioretention areas and detention facilities would control stormwater flow and discharges and prevent contamination of surface water resources. For these reasons, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Thus, this impact was found to be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project. Additionally, the project refinements would comply with all applicable Marin County Code and California Construction General Permit requirements including development and implementation of a SWPPP and BMPs, and would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to implementation of a water quality control plan or sustainable groundwater management plan, and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to a water quality control plan or sustainable groundwater management plan, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North

Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **f) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would exacerbate any existing and/or projected damage to the environment, including existing structures, human health, and sensitive resources, associated with reasonably foreseeable future sea level rise and peak high tides in Impact 3.9-6 of Section 3.9, "Hydrology." As the Earth warms due to climate change, sea-level rise (SLR) and peak high tides have the potential to exacerbate existing and/or projected damage to the environment, including existing structures, human health, and sensitive resources. The project site is located adjacent to the San Francisco Bay, which is likely to experience sea level rise in the future (OPC 2018). There are no buildings or roadways in the project site vulnerable to future SLR in the long-term scenario even with 60-inches of SLR and 100-year storm event in the project site (CSW|ST2 2021). The frontage roads leading to the project site currently experience peak tide flooding. Increases in traffic exposure to the existing hazard would occur with construction of the proposed project. The proposed project would not exacerbate any existing or projected damage to the environment associated with future sea level rise and peak high tides. Therefore, this impact was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

As mentioned above, the project refinements would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project. As described in the North Coast Land Holdings Project EIR, the project site is not projected to be inundated under near-term, mid-term, or long-term sea level rise (SLR) scenarios, including the long-term scenario with approximately 60 inches of SLR combined with a 100-year storm event. While low-lying access roads in the vicinity, including Seminary Drive and adjacent frontage roads, are currently subject to periodic flooding during king tide events and would continue to experience increased inundation under future SLR conditions, the project itself would not exacerbate these conditions.

While project refinements would limit the heights of the three six-story buildings and the residential care facility, they would not alter the location of proposed buildings in the various planning areas or introduce new structures or infrastructure in areas vulnerable to SLR. In addition, the project refinements would not alter circulation infrastructure, roadway alignments, or access points to the project site. However, the project refinements would modify operational characteristics by limiting the number of commuting students and potentially increasing the proportion of students residing on-site. This change would reduce the number of daily vehicle trips to and from the site relative to the assumptions in the North Coast Land Holdings Project EIR. Because the North Coast Land Holdings Project EIR identified that the primary SLR-related concern is increased exposure of vehicles traveling on already flood-prone access roads, the reduction in commuter traffic as a result of the project refinements would not increase—and may slightly reduce—project-related exposure to this existing hazard.

As concluded in the North Coast Land Holdings Project EIR, although the proposed project would result in an increase in the number of people traveling to and from the project site and therefore incrementally increase exposure to existing flooding hazards along access routes, it would not exacerbate the underlying hazard or contribute to sea level rise or peak high tide conditions. The project refinements would not increase the number of residents beyond what was previously analyzed and would reduce commuter travel, thereby not increasing exposure beyond previously disclosed levels. Furthermore, the project refinements would not affect the project's compliance with applicable regulatory requirements, including stormwater management, drainage design, and adherence to County standards intended to address flooding and climate-related risks.

Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to future sea level rise and peak high tides, and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to future sea level rise and peak high tides, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.11 Land Use and Planning

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Land Use & Planning Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Physically divide an established community?	Yes	No	No	N/A	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Yes	No	No	No	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would physically divide an established community in “Issues Not Discussed Further” of Section 3.10, “Land Use and Planning.” The proposed project is within an existing residential neighborhood currently developed with single- and multi-family housing, as well as an academic campus. The proposed project would not result in any changes to the existing land use designations or zoning for the project site that could introduce new incompatible uses (e.g., industrial) to the surrounding area. Additionally, the project would be consistent with the allowable density for the site identified in the Marin Countywide Plan and the County’s zoning regulations. Furthermore, the proposed project would not require the construction of new roadways or reconfiguration or closure of existing roadways that could divide existing development within the surrounding community. Therefore, the proposed project would not physically divide an established community and this issue was not discussed further in the Draft EIR.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

The project refinements would result in similar impacts related to physically dividing an established community as the originally proposed project. The project refinements would not result in any changes to the type or amount of development that could occur on the project site compared to the originally proposed project. In addition, the project refinements would not alter circulation infrastructure, roadway alignments, or access points to the project site. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR and thus would not physically divide an established community, similar to the originally proposed project.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to physically dividing an established community. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to physically dividing an established community and there would

continue to be no project-level or cumulative impacts. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to related to physically dividing an established community, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect in Impact 3.10-1 of Section 3.10, "Land Use and Planning." Potentially significant land use impacts would result when inconsistencies with goals and policies adopted to avoid or mitigate environmental effects would occur where such inconsistencies would result in a potentially significant physical impact on the environment. The proposed project would potentially be inconsistent with goals and policies and policies related to aesthetics, biological resources, and noise. Because these policy inconsistencies could indicate or result in significant environmental impacts, the proposed project's land use impact related to these inconsistencies would be potentially significant.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measures 3.2-1, 3.4-1a, 3.4-1b, 3.4-2a, 3.4-2b, 3.4-4, 3.4-5, 3.4-7, 3.6-2, 3.6-4, 3.11-1, and 3.11-4 to address this potentially significant impact. As discussed in Sections 3.2, 3.4, 3.6, and 3.11, the implementation of mitigation measures would reduce impacts on air quality, biological resources, geology and soils, and noise (operations) to less than significant. Although the project would result in a significant and unavoidable project-level construction noise impact, the proposed project would incorporate all feasible mitigation measures to minimize and reduce construction noise, consistent with Countywide Plan Policy NO-1.3. The proposed project would be consistent with all applicable policies of the Countywide Plan and Strawberry Community Plan, as well as the overall general intent of these plans. Therefore, land use and planning impacts would be less than significant with mitigation incorporated.

### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect as the originally proposed project. The project refinements would not result in any changes to the type or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. In addition, the refined project would not result in or require any changes to the existing land use designations or zoning for the project site and would be consistent with the allowable density for the site identified in the Marin Countywide Plan and the County's Zoning Regulations. The refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. Because the project would include all the same components as the proposed project, and would only result in a slight redistribution of residential units throughout the project site, the project refinements would still potentially be inconsistent with goals and policies and policies related to aesthetics, biological resources, and noise, similar to the originally proposed project. However, similar to the originally proposed project, the implementation of

Mitigation Measures 3.2-1, 3.4-1a, 3.4-1b, 3.4-2a, 3.4-2b, 3.4-4, 3.4-5, 3.4-7, 3.6-2, 3.6-4, 3.11-1, and 3.11-4 would be required and would ensure that the refined project would be consistent with all applicable policies of the Countywide Plan and Strawberry Community Plan, as well as the overall general intent of these plans.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to conflicting with land use plans, policies, or regulations. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to conflicting with land use plans, policies, or regulations and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to related to conflicting with land use plans, policies, or regulations, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.12 Mineral Resources

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Mineral Resources	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
Would the Project...					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Yes	No	No	N/A	No
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	Yes	No	No	N/A	No

#### a-b) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the proposed project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan in Section 6.1.4 “Mineral Resource Zone Identified by the California Department of Mines and Geology,” of Section 6.1, “Effects Found Not to be Significant.” The project site is not within a State designated Mineral Resource Zone. Therefore, there would be no impact on mineral resources and this issue was not analyzed further.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

The project refinements would not alter the physical location of the proposed project. Thus, as with the proposed project, the project refinements would not be located within a State designated Mineral Resource Zone. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to mineral resources and project-level and cumulative impacts would not occur. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to mineral resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public’s ability to meaningfully comment on environmental impacts. For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### 4.1.13 Noise

#### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Noise Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	Yes	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	Yes	No	No	N/A	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Yes	No	No	N/A	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies in Impact 3.11-1, Impact 3.11-3, and Impact 3.11-4 of Section 3.11, "Noise and Vibration."

##### Temporary Construction Noise

Hourly noise levels during construction activities would range from approximately 77 dBA to 86 dBA Leq at adjacent residential receptors. Based on available existing noise level data for the project site, construction noise would intermittently constitute a substantial increase (perceived more than doubling of the existing noise levels) for an extended period of construction time (estimated to be four years). With this combination of temporary noise level increase at nearby receivers and extended period of intermittent construction noise impacts would be significant.

##### Long-Term Transportation Noise Levels

Long-term increases in traffic noise could occur as a result of increased vehicular trips on local roads near the project site. Based on modeling conducted using project-specific daily traffic volumes and applying Federal Transit Administration's (FTA) allowable increase levels for transportation noise sources, these levels would not be exceeded on modeled roadways. This impact would be less than significant.

##### Long-Term Stationary Source Noise Levels

Noise generated by building mechanical equipment, parking lot activity, and the playing field would not exceed established noise standards for sensitive receivers exposed to stationary noise sources. However, the operation of new building HVAC equipment could potentially result in a substantial increase in noise during the more sensitive times of the night. Mitigation would be required to provide shielding to reduce noise from HVAC equipment and this impact would be potentially significant.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

#### **Temporary Construction Noise**

The Draft EIR proposed Mitigation Measure 3.11-1 to address this potentially significant impact. Mitigation Measure 3.11-1 would reduce noise by locating equipment as far away from receivers as possible, requiring the proper use of available noise-reduction equipment, including use of alternatively powered equipment, exhaust mufflers, engine shrouds, equipment enclosures, and barriers for activities in the vicinity of noise-sensitive uses. Implementation of these noise-reduction features can reduce construction noise levels by approximately 10 dBA, or more (NCCHP 1999). With mitigation, construction-generated noise levels would be substantially reduced. However, due to the large scale of construction of the project it cannot be assured that construction noise levels could be reduced by up to 39 dBA at nearby residences. As such, project construction would result in exceedance of 5 dBA above existing conditions and is considered distinctly perceptible by most people and therefore a substantial temporary increase in noise. Therefore, this impact would remain significant and unavoidable.

#### **Long-Term Transportation Noise Levels**

No mitigation measures were required for this impact.

#### **Long-Term Stationary Source Noise Levels**

The Draft EIR proposed Mitigation Measure 3.11-4 to address this potentially significant impact. Mitigation Measure 3.11-4 would reduce noise by requiring compliance with the County's stationary noise source criteria and ensuring mechanical equipment noise would not exceed ambient noise by more than 5 dBA by placing equipment as far away as possible from sensitive land uses, placing noise barriers around mechanical equipment, and using buildings and topographic features for acoustic shielding. Implementation of these noise-reduction features can reduce mechanical equipment noise levels by 5 dBA, or more (FTA 2018). Therefore, mechanical equipment noise would be reduced to less than 5 dBA above ambient noise levels. Impacts would be less than significant with mitigation.

### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies as the originally proposed project. The project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR.

As such, construction would occur within the project site at generally the same locations analyzed in the North Coast Land Holdings Project EIR, and the refined project would not result in any changes to adverse effects from construction noise, as the scale and intensity of construction evaluated in the North Coast Land Holdings Project EIR would remain the same and would, therefore, still require implementation of Mitigation Measure 3.11-1.

As detailed in Section 4, "Description of Project Refinements," per the 1953 CUP, there would be no change to the permitted enrollment at the academic campus (i.e., maximum student population of 1,000), and the proposed project refinements include the stipulation that on-site campus enrollees in excess of 325 students shall be required to reside on the project site or accommodated via online learning. Additionally, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with

individuals who live or work on-site, these facilities would be offered to residents in the surrounding Strawberry neighborhood. Thus, the refined project would result in reduced trips as compared to the originally proposed project because fewer students and fitness center/daycare patrons would commute to and from the project site. Therefore, the impact on traffic noise, which was evaluated in the Draft EIR by analyzing net increases in project-specific daily traffic volumes, would be less severe because daily trips would be reduced.

The refined project would not affect noise generated by building mechanical equipment, parking lot activity, and the playing field as compared to the originally proposed project. Therefore, stationary noise from building mechanical equipment, parking lot activity, and the playing field would not exceed established noise standards for sensitive receivers exposed to stationary noise sources and impacts would be similar to what was analyzed in the North Coast Land Holdings Project EIR. However, as identified in the North Coast Land Holdings Project, the operation of new building HVAC equipment could potentially result in a substantial increase in noise during the more sensitive times of the night. This impact would still occur under the refined project. Thus, the refined project would still be required to implement Mitigation Measure 3.11-4.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to temporary or permanent noise. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to temporary and permanent noise and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to temporary and permanent noise, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would result in generation of excessive groundborne vibration or groundborne noise levels in Impact 3.11-2 and "Issues Not Discussed Further" of Section 3.11, "Noise and Vibration."

### **Temporary Construction Vibration**

The use of heavy-duty construction equipment can generate various levels of vibration that could result in disturbance to nearby sensitive land uses or structural damage. Based on modeling conducted, vibration levels for a vibratory roller at the nearest structure to the project site, approximately 30 feet from where the use of construction equipment could occur, would be 101 VdB and 0.160 peak particle velocity (PPV) in/sec. Construction vibration would occur during daytime hours when people are less likely to be disturbed; thus, the potential for disturbance to nearby receptors is low. In addition, FTA's criteria of 0.2 PPV in/sec would not be exceeded at the nearest structure. Impacts would be less than significant.

### **Long-Term Operational Vibration**

Project implementation would not introduce any major sources of long-term or permanent ground vibration (in contrast to construction vibration, which is evaluated in Impact 3.11-2). Additionally, no major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed on-site land uses to unacceptable levels of ground vibration. Thus, long-term or permanent ground vibration levels in

exceedance of the significance thresholds are not anticipated as a result of project implementation. This issue was not discussed further in the Draft EIR.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

#### **Temporary Construction Vibration**

No mitigation measures were required for this impact.

#### **Long-Term Operational Vibration**

No mitigation measures were required for this impact.

### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to the generation of excessive groundborne vibration or groundborne noise as the originally proposed project. The project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR.

As such, construction would occur within the project site at generally the same locations analyzed in the North Coast Land Holdings Project EIR, and the refined project would not result in any changes to effects from construction vibration, as the scale and intensity of construction evaluated in the North Coast Land Holdings Project EIR would remain the same. Additionally, the refined project would not introduce any major sources of long-term or permanent ground vibration. Therefore, impacts would be similar to the original project evaluated in the EIR.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to groundborne vibration and groundborne noise. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to groundborne vibration and groundborne noise and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to groundborne vibration and groundborne noise, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels in "Issues Not Discussed" of Section 3.11, "Noise." The project site is not located within an airport influence area, and no public or private airport/airstrip is located within two miles of the project site. Thus, the project would not result in noise impacts related to the exposure of people residing or working in the project area to excessive aircraft-related noise levels. This issue was not discussed further in the Draft EIR.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

As disclosed in the North Coast Land Holdings Project EIR, the project site is not located within an airport influence area, and no public or private airport/airstrip is located within two miles of the project site. Although the project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. Thus, the refined project would not result in noise impacts related to the exposure of people residing or working in the project area to excessive aircraft-related noise levels.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to airport noise. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to airport noise and there would continue to be no project-level or cumulative impact.. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to airport noise, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.14 Population and Housing

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Population & Housing Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Yes	No	No	N/A	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Yes	No	No	N/A	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the proposed project would induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly in Impact 3.12-1 of Section 3.12, "Population and Housing." Implementation of the proposed project would increase the number of housing units on the project site by 185 new units and increase the population on the site by approximately 530 residents for a total of 337 residential units and approximately 850 residents. A portion of the residents on-site would include students, faculty, staff, and families affiliated with the academic campus. The Draft EIR assumed most of the students and university employees would live off-site, and most of them are expected to be already living in the area. A substantial number of students and other individuals are not expected to relocate to the area in response to implementation of the project. In addition, the population in the unincorporated county has declined in recent years, the County has long identified the project site as a housing opportunity site to assist with meeting its Regional Housing Needs Allocation (RHNA) requirement, as it was included in the recent Housing Element adopted in 2023, and the anticipated increase in population under the project would not be substantial compared to the growth anticipated and analyzed in the 2007 Marin Countywide Plan Update Final EIR and the 2022 Housing & Safety Element Update to the Marin Countywide Plan Final EIR. Therefore, the growth anticipated on the site under the project would be neither substantial nor unplanned. Thus, this impact was found to be less than significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

The project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities. These refinements restrict uses on the academic campus to graduate, post-graduate, and research programs, and uses involving primary or secondary education would be prohibited. Additionally, enrollment for the academic campus would be limited to a maximum of 325 commuting students (or 32.5 percent of total enrollment allowed under the 1953 CUP). Students in excess of 325 commuting students would either be enrolled in on-line learning, with no associated physical presence or trips to and

from the academic campus, or would be required to reside on the project site in residential units proposed as part of the originally proposed project. As such, the project refinements would effectively limit the number of students regularly commuting to and from the site. Membership to the daycare and fitness center facilities would be limited to residents and individuals who live or work on-site; however, if capacity remains available, these facilities may be offered on a limited basis to residents of the surrounding Strawberry area.

While the project refinements limit and restrict the types of educational uses allowed at the academic campus and cap the maximum total number of commuting students at 325, they would not change the total enrollment cap of 1,000 students. Additionally, the project refinements related to the residential uses are focused on the physical design of the proposed project and would not alter the originally proposed development of a total of 337 residential units, including new and replacement residential units as well as a residential care facility. Thus, as with the proposed project, the project refinements would result in an increase of 185 new residential units and an increase in on-site population by approximately 530 residents. However, the composition of the resident population could shift as a result of the project refinements. Where the North Coast Land Holdings Project EIR assumed approximately 30 percent of the resident population could be students enrolled in the academic campus, with most students and university employees living off-site, the project refinements would allow a greater proportion of students to reside on-site and reduce the number of students living off-site and commuting. This represents a redistribution of occupants within the same overall housing supply and does not increase the total population beyond what was previously analyzed.

As a result, while the total number of residential units and overall population would remain consistent with the North Coast Land Holdings Project EIR, the refined project has the potential to function as more of a residential campus supporting the academic uses with reduced reliance on the surrounding housing market as well as decrease daily vehicle trips associated with student commuting. Although the daycare and fitness center could serve a limited number of nearby residents if excess capacity exists, this would not materially increase activity beyond levels analyzed in the North Coast Land Holdings Project EIR. Therefore, the project refinements would not result in new or substantially more severe impacts or warrant new or revised mitigation related to unplanned growth. Accordingly, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to unplanned growth and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to unplanned growth, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere in Impact 3.12-2 of Section 3.12, "Population and Housing." Implementation of the proposed project would involve demolition of 139 residential units, which would result in the displacement of approximately 320 people. A recent estimate indicates that more than 3,000 housing units are available in unincorporated Marin County (DOF 2025). Substantially more housing is available if portions of the East Bay and San Francisco are also considered in light of typical regional commute distances. In addition, the County anticipates construction of 5,214 housing units with implementation of the updated Housing Element (Marin County 2023). A portion of this new housing would become available during the 4-year project construction period. Further, various benefits would be available to displaced residents. Lower-income residents, for example, would be

entitled to payment of moving expenses; relocation assistance; and payment of the difference, if any, between affordable rent and rent for a “comparable” unit for up to 42 months. Although 139 residential units would be demolished under the project, the number of units lost would be replaced, and another 185 units would be added. Therefore, the number of residential units on the project site, including the 13 housing units that were retained, would increase to 337 units. The expanded number of units would be sufficient to house up to approximately 850 residents—an increase of approximately 530 residents. In addition, Program 3 of the Housing Element and Housing Density Bonus Law requires that any project that involves demolition of affordable housing on a project site replace the number of affordable units lost with new affordable units; otherwise, the project would not be eligible for the density bonus and would be inconsistent with State law. The Draft EIR assumed approximately 30 percent of proposed project housing units would be occupied by the student, staff, and faculty population, so a portion of the students and faculty members displaced during construction would be expected to move back onto the project site following construction. Existing housing supply in the County and in neighboring regions of the Bay Area and housing anticipated in the Housing Element are much larger than the number of displaced residents, so it is expected to be sufficient to house the remaining displaced residents. Because existing housing in the region would be sufficient to house residents displaced during construction, additional housing will become available as the County proceeds with construction of 5,214 housing units anticipated under the updated Housing Element, the project site would be able to house up to approximately 850 residents (an increase of approximately 530 residents) following buildout of the project, and the County would require that all the demolished affordable units be replaced with the same number of affordable units at the same affordability and that 20 percent of the total number of units be affordable, construction of replacement housing elsewhere would not be required to address the displacement of residents from the project site. Thus, this impact was found to be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

Similar to the discussion above in Section 5.1.15(a), the project refinements related to the academic campus, residential uses, and associated operational characteristics would not alter the fundamental components of the proposed project that would affect the displacement of existing residents or housing units. As analyzed in the North Coast Land Holdings Project EIR, implementation of the project would require demolition of 139 residential units and would result in the displacement of approximately 320 existing residents. The project refinements do not modify the number of units proposed for demolition, the number of units to be constructed, or the total number of residential units at buildout (337 units). Therefore, scale of displacement would remain the same as previously disclosed in the North Coast Land Holdings Project EIR.

The project refinements could, however, potentially modify the composition of future on-site residents by increasing the proportion of students who would reside on-site and reducing the number of students living off-site and commuting to the academic campus. This shift would not increase the number of residents displaced during construction, nor would it reduce the proposed project’s capacity to accommodate residents on-site following buildout. Rather, it represents a redistribution of future occupants within the same housing supply evaluated in the North Coast Land Holdings Project EIR. In addition, by limiting the number of commuting students, the project refinements could reduce demand for off-site housing in the surrounding area, thereby slightly reducing pressure on the local housing market compared to what was assumed in the North Coast Land Holdings Project EIR.

As described in the North Coast Land Holdings Project EIR, the number of displaced residents (approximately 320 people) is substantially less than the available housing supply in unincorporated Marin County and the broader regional market, which includes thousands of available units as well as planned housing under the County’s Housing Element. Furthermore, compliance with applicable regulatory requirements, including replacement housing provisions under State law and the County’s Housing Element, would ensure that all demolished units are replaced and that affordable housing obligations are maintained. Displaced residents would also be entitled to relocation assistance and a right of return pursuant to State law. These conditions would remain unchanged with the project refinements.

Because the project refinements would not increase the number of displaced residents or housing units, would not reduce the supply of replacement housing provided on-site, and would reduce off-site housing demand associated with commuting students, they would not necessitate the construction of replacement housing elsewhere beyond what was analyzed in the North Coast Land Holdings Project EIR. Therefore, the project refinements would not result in new or substantially more severe impacts or warrant new or revised mitigation related to displacement of people or housing. Accordingly, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to displacement of people or housing and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to displacement of people or housing, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.15 Public Services

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Public Services Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i) Fire protection?	Yes	No	No	No	No
ii) Police protection?	Yes	No	No	N/A	No
iii) Schools?	Yes	No	No	N/A	No
iv) Parks?	Yes	No	No	N/A	No
v) Other public facilities?	Yes	No	No	N/A	No

#### a-i) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the proposed project would result in increased demand for fire protection in Impact 3.13-1 of Section 3.13, "Public Services and Recreation." Implementation of the proposed project would increase the number of housing units on the project site by 185 (including the residential care facility) and increase the population on-site by approximately 530 residents, increasing demand for fire protection and emergency services on-site. Operation of the residential care facility is expected to increase the demand for emergency services on the project site. The project would adhere to all applicable standards and fire codes, the project applicant would be required to pay a fire prevention fee to offset the impact of the project on the provision of fire protection services, and implementation of the proposed project would not necessitate the construction of new or expanded fire service facilities. However, Southern Marin Fire District (SMFD) has expressed concern that traffic associated with the increase in population under the proposed project may cause delays in emergency response in the area. Therefore, this impact was found to be potentially significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

Mitigation Measure 3.14-4 would require the project applicant to purchase, install, and activate emergency vehicle preemption devices in the traffic signals at the intersections of Redwood Highway Frontage Road/Seminary Drive and Redwood Highway Frontage Road/US 101 northbound ramps/De Silva Island Drive as well as seven fire station vehicles housed at Southern Marin Fire District Strawberry Fire Station 9. Mitigation Measure 3.14-4 would help maintain vehicular flow during emergency response by prioritizing right-of-way for emergency vehicles traveling

from Fire Station 9 to US 101. Implementing Mitigation Measure 3.15-4 would reduce the impact on increased demand for fire protection services. Therefore, the impact would be less than significant with mitigation incorporated.

### **Consistency Assessment of Project Refinements:**

Similar to the discussion above in Section 5.1.14, "Population and Housing," the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that would affect demand for fire protection facilities and services. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the number of residential units on site by 185 and increase the on-site population by approximately 530 residents, as well as introduce a residential care facility that could generate additional emergency service calls. These factors would also affect demand for fire protection and emergency medical services with the project refinements. However, the project refinements would not change the total number of residential units, the estimated population increase, or the inclusion of the residential care facility; therefore, the overall demand for fire protection services would remain consistent with that previously disclosed in the North Coast Land Holdings Project EIR.

The project refinements would modify certain operational characteristics by limiting the number of commuting students to a maximum of 325 and potentially increasing the proportion of students residing on the project site. This shift would reduce the number of daily vehicle trips associated with commuting to the academic campus and would not increase the total number of on-site residents or structures requiring fire protection services. Because demand for fire protection services is primarily driven by the number of residents, structures, and specific land uses (such as the residential care facility), rather than the commuting behavior of students, this redistribution of population would not materially increase demand for fire protection services beyond what was analyzed in the North Coast Land Holdings Project EIR.

Additionally, the project refinements would modify the physical design of some of the residential uses by reducing the height of the originally proposed three six-story residential buildings in the Hodges/Shuck Planning Area to four stories which could result in redistribution of up to 28 residential units to modified buildings in the other originally proposed project planning areas. However, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units including new and replacement residential units as well as a residential care facility. The project refinements related to the residential care facility reaffirm and commit the project design to not exceeding the building heights originally proposed under the proposed project and evaluated in the North Coast Land Holdings Project EIR. The project refinements would be required to comply with all applicable fire codes, building standards, and fire department requirements, and would not alter the building materials or location of proposed buildings in the various planning areas. The North Coast Land Holdings Project EIR concluded that the proposed project would not require the construction of new or expanded fire protection facilities, although additional staffing could be needed to address increased service calls. These conclusions would remain applicable with the project refinements because the intensity of development and associated service demand would not increase.

The North Coast Land Holdings Project EIR also identified that increased traffic associated with project-generated trips could potentially affect emergency response times, resulting in a potentially significant impact that would be mitigated through transportation improvements, including emergency vehicle preemption and intersection improvements (Mitigation Measure 3.14-4). The project refinements, by reducing the number of commuting students and associated vehicle trips, would not exacerbate this condition and would likely reduce traffic-related interference with emergency response compared to what was analyzed in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to demand for fire protection facilities and services, and would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to demand for fire protection facilities and services and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to demand for fire protection facilities and services, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the

significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **a-ii) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would result in increased demand for police protection in Impact 3.13-2 of Section 3.13, "Public Services and Recreation." Implementation of the proposed project would increase the population on the project site by approximately 530 residents, increasing demand for police protection services. According to the Marin County Sheriff's Office, existing staffing levels would be sufficient to address the increase in population on-site, and no reduction in service to the unincorporated county in general would be expected. In addition, no additional facilities or equipment would be required. Further, as part of the standard development review process, the proposed project would be subject to formal Sheriff's Office review and approval. Therefore, the impact related to police protection facilities and services was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

Similar to fire protection services discussed above in Section 5.1.15(ai), the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that contribute to demand for police protection services. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the on-site population by approximately 530 residents and introduce additional employees associated with campus, residential care, and fitness center uses, which would incrementally increase demand for police protection services. However, the project refinements do not change the total number of residential units, the estimated population increase, or the overall employment-generating uses; therefore, the overall demand for police protection services would remain consistent with that analyzed in the North Coast Land Holdings Project EIR.

The project refinements would modify certain operational characteristics by limiting the number of commuting students to a maximum of 325 and potentially increasing the proportion of students residing on the project site. This shift would reduce the number of daily vehicle trips associated with commuting to the academic campus and would not increase the total number of on-site residents or structures requiring fire protection services. Because demand for police protection services is primarily driven by population levels and site activity rather than commuting patterns, this redistribution of residents would not materially increase demand for police services beyond what was evaluated in the North Coast Land Holdings Project EIR. To the extent that reduced commuting results in fewer daily trips, the project refinements could marginally reduce off-site traffic-related service calls compared to the original project assumptions.

As described in the North Coast Land Holdings Project EIR, the Marin County Sheriff's Office would continue to serve the project site, and existing staffing levels were determined to be sufficient to accommodate the incremental increase in population without requiring new or expanded police facilities or equipment. The project would remain subject to standard law enforcement review during the development process to ensure adequate service provision. These conditions would remain unchanged under the project refinements. Because the project refinements would not increase the number of residents, employees, or overall intensity of use beyond what was analyzed in the North Coast Land Holdings Project EIR, and would reduce commuting activity that could contribute to service demand, they would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to police protection services and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in

the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to police protection services, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **a-iii) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would result in increased demand for public school facilities and services in Impact 3.13-3 of Section 3.13, "Public Services and Recreation." Implementation of the proposed project would increase the number of housing units on the project site by 185 (including the residential care facility), generating an estimated 93 students in the Mill Valley School District and 37 students in the Tamalpais Union High School District. This increase in school district populations would not be substantial, and both the Mill Valley School District and the Tamalpais Union High School District could accommodate this increase in student population. In addition, the project applicant would be required to pay school impact fees to assist the school districts with meeting the increased demand for school services. Government Code Section 65995(h) states that the payment or satisfaction of a fee, charge, or other requirement levied or imposed under Section 17620 of the Education Code is deemed to be full and complete mitigation of the impact for the planning, use, development, or provision of adequate school facilities. Thus, this impact was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

Similar to fire and police protection services, the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that contribute to demand for public school facilities. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the number of residential units on-site by 185 (excluding the residential care facility for student generation purposes) and generate an estimated 93 students in the Mill Valley School District and 37 students in the Tamalpais Union High School District. However, the project refinements would not change the total number of residential units, the estimated population increase, or the types of residential uses proposed; therefore, the anticipated student generation and resulting demand for public school facilities would remain consistent with that previously analyzed in the North Coast Land Holdings Project EIR.

The project refinements would modify certain operational characteristics by limiting the number of commuting students and potentially increasing the proportion of students residing on-site. However, the academic campus is restricted to graduate, post-graduate, and/or research programs, and student enrollment associated with these uses would not generate demand for K-12 public school facilities. The shift toward a potentially greater proportion of on-site student residents would not increase the number of school-aged children generated by the project and would not affect the student generation rates applied in the North Coast Land Holdings Project EIR. Therefore, the project refinements would not increase demand for public school facilities beyond what was evaluated in the North Coast Land Holdings Project EIR.

As described in the North Coast Land Holdings Project EIR, both the Mill Valley School District and the Tamalpais Union High School District have existing and projected enrollment levels below capacity and would be able to accommodate the students generated by the proposed project within existing facilities. In addition, payment of applicable school impact fees pursuant to State law would constitute full and complete mitigation of impacts to school facilities. These

conclusions would remain unchanged under the project refinements. Because the project refinements would not increase the number of residential units, would not alter the student generation assumptions, and would not introduce new sources of K–12 student population, they would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to public school facilities and services and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to public school facilities and services, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public’s ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **a-iv) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would result in increased demand for park facilities and services in Impact 3.13-4 of Section 3.13, “Public Services and Recreation.” Implementation of the proposed project would increase the population on the site by approximately 530 residents, which could result in an increased demand for park facilities and services in the area. The Marin County Development Code requires new residential developments to provide developed park and recreational land and/or pay a fee in lieu of parkland dedication to help mitigate the impacts of the new residential demand on existing parkland and recreational facilities. In compliance with the Subdivision Map Act, 3 acres of land for each 1,000 persons residing in a subdivision subject to the act must be devoted to neighborhood and community park and recreational purposes. The details regarding the project applicant’s implementation of its obligation under the Marin County Development Code would be determined following project approval. Because the project applicant would comply with this Marin County Development Code requirement, this impact was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

Similar to the analysis in Sections 3.1.15(ai through aiii), the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that contribute to demand for park and recreation facilities. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the on-site population by approximately 530 residents, which could result in increased demand for park and recreation facilities in the area. However, the project refinements would not change the total number of residential units, the estimated population increase, or the overall site design that includes abundant on-site open space and recreational amenities; therefore, the overall demand for park and recreation facilities would remain consistent with that analyzed in the North Coast Land Holdings Project EIR.

The project refinements would modify operational characteristics by limiting the number of commuting students and possibly increasing the proportion of students residing on-site. This shift would not increase the total on-site population but may slightly change how recreational facilities are used. A higher proportion of on-site residents, including students, could increase use of on-site recreational amenities; however, the project includes extensive on-site open space, trails, and recreational features that are intended to accommodate such demand. Approximately 70 percent of the project site would continue to be maintained as open space, athletic fields, paths, and plazas, and these facilities would remain available to both project residents and, in many cases, the broader community. In

addition, the project would continue to be subject to Marin County Development Code requirements, including the provision of parkland and/or payment of in-lieu fees pursuant to the Quimby Act to address increased demand for recreational facilities. These conditions would remain unchanged under the project refinements.

Because the project refinements would not increase the number of residents beyond what was analyzed in the North Coast Land Holdings Project EIR, would not reduce the amount of on-site recreational space, and would continue to comply with applicable parkland dedication or fee requirements, they would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to park facilities and services and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to park facilities and services, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **a-vi) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would result in increased demand for other public facilities and services in Impact 3.13-4 of Section 3.13, "Public Services and Recreation." Implementation of the proposed project would increase the population on the project site by approximately 530 residents, which could result in an increase in the demand for other public facilities and services, including local libraries. Any anticipated increase in demand for local libraries or other public facilities and services would be expected to be minimal. In addition, the library system and other public facilities and services are funded primarily by their share of the revenue generated by property taxes, and the amount of property tax generated would increase with the increase in population anticipated under the proposed project. Thus, this impact was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

Similar to the analysis above in Sections 3.1.15(ai through aiv), the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that contribute to demand for other public facilities and services, such as libraries and community facilities. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the on-site population by approximately 530 residents and introduce additional employees, which could incrementally increase demand for such services. However, the project refinements would not change the total number of residential units, the estimated population increase, or the overall employment-generating uses; therefore, the overall demand for other public facilities and services would remain consistent with that previously analyzed in the North Coast Land Holdings Project EIR.

The project refinements would modify operational characteristics by limiting the number of commuting students and increasing the proportion of students residing on-site. This shift would reduce the number of off-site commuters traveling to and from the project site and would not increase the total on-site population. Because demand for other public facilities and services is primarily driven by population levels rather than commuting patterns, this redistribution of residents would not materially increase demand beyond what was evaluated in the North Coast Land

Holdings Project EIR. To the extent that reduced commuting results in fewer daily trips, the project refinements could marginally reduce off-site use of certain public facilities compared to original assumptions.

As described in the North Coast Land Holdings Project EIR, any increase in demand for other public facilities and services, including local libraries, would be minimal and would be offset by increased property tax revenues generated by the proposed project, which help fund such services. No new or expanded facilities would be required to accommodate project-related demand. These conclusions would remain unchanged under the project refinements. Because the project refinements would not increase the number of residents or employees beyond what was analyzed in the North Coast Land Holdings Project EIR and would not introduce new types of demand for public facilities, they would result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to other public facilities and services and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to other public facilities and services, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.16 Recreation

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Recreation Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Yes	No	No	N/A	No
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Yes	No	No	N/A	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated in Impact 3.13-6 of Section 3.13, "Public Services and Recreation." Population on-site would increase by approximately 530 under the proposed project, which could result in increased use of neighborhood and regional parks and other recreational facilities in the area. However, because the recreational opportunities available in federal, state, County, and city recreation and park facilities in the project area and in the county overall are extensive and the project applicant would be required by the Marin County Development Code to provide developed park and recreational land and/or pay a fee in lieu of parkland dedication to help mitigate the impacts of the new residential demand on existing parkland and recreational facilities, implementing the proposed project would not result in the substantial physical deterioration (or acceleration of deterioration) of recreational facilities in the region. Thus, this impact was found be less than significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

Similar to the assessment above in Section 5.1.15, "Public Services," the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that contribute to the use of existing neighborhood and regional parks or other recreational facilities. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the on-site population by approximately 530 residents, which could result in increased use of recreational facilities in the area. However, the project refinements would not change the total number of residential units, the estimated population increase, or the overall site design that includes substantial on-site recreational amenities; therefore, the level of demand for recreational facilities would remain consistent with that analyzed in the North Coast Land Holdings Project EIR.

The project refinements would modify operational characteristics by limiting the number of commuting students and potentially increasing the proportion of students residing on-site. This shift would not increase the total on-site population but may result in a greater proportion of recreational use occurring on-site rather than off-site. With potentially more students residing on the project site, use of on-site recreational amenities—such as open space areas, trails, and the playing field—could increase, while demand on nearby off-site recreational facilities could correspondingly decrease. As described in the North Coast Land Holdings Project EIR, approximately 70 percent of the project site would be maintained as open space, athletic fields, paths, and plazas, and these facilities would be available to accommodate recreational demand generated by project residents. In addition, Marin County contains extensive park and recreational resources, including federal, state, County, and local facilities, which provide abundant opportunities to accommodate recreational use. The proposed project would also be required to comply with applicable Marin County Development Code requirements, including parkland dedication or payment of in-lieu fees pursuant to the Quimby Act, which would help offset any increase in demand on recreational facilities. These conditions would remain unchanged under the project refinements.

Because the project refinements would not increase the total number of residents beyond what was analyzed in the North Coast Land Holdings Project EIR, would not reduce on-site recreational amenities, and may shift recreational demand toward on-site facilities, they would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to neighborhood and regional parks or other recreational facilities and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to neighborhood and regional parks or other recreational facilities, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment in Impact 3.13-7 of Section 3.13, "Public Services and Recreation." The modification of recreation and open space features on the project site that would occur as part of the proposed project, including raising the Seminary Playing Field and improving and establishing trails and pathways, would not have a substantial adverse physical effect on the environment. Because the population increase of approximately 530 residents anticipated for the project could increase the demand for neighborhood and regional parks and other recreational facilities in the area, the project applicant would be required by the Marin County Development Code to provide developed park and recreational land and/or pay a fee in lieu of parkland dedication to help mitigate the impacts of the new demand on existing parkland and recreational facilities. Any parkland developed to meet this requirement would be created in coordination with the County and in accordance with County standards. Thus, this impact was found to be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

Similar to the discussion above in Section 5.1.16(a), the project refinements related to the academic campus, residential uses, and operational characteristics would not alter the fundamental proposed project components that could result in the need for construction or expansion of recreational facilities. As analyzed in the North Coast Land Holdings Project EIR, implementation of the proposed project would increase the on-site population by approximately 530 residents, which could incrementally increase demand for recreational facilities; however, this demand would be accommodated through a combination of existing regional facilities, on-site amenities, and compliance with applicable parkland dedication and fee requirements. The project refinements would not change the total number of residential units, the estimated population increase, or the extent of on-site recreational amenities; therefore, the overall demand for recreational facilities would remain consistent with that analyzed in the North Coast Land Holdings Project EIR.

The project refinements would modify operational characteristics by limiting the number of commuting students and potentially increasing the proportion of students residing on-site. This shift would not increase the total on-site population and would not create a need for additional or expanded recreational facilities beyond those already included in the proposed project design. Instead, the project refinements may result in greater utilization of the on-site recreational amenities already planned. Because the proposed project includes abundant on-site open space, trails, and recreational features designed to serve residents and, in some cases, the surrounding community, the project refinements would not create a need for additional off-site recreational facilities or expansion of existing facilities beyond what was evaluated in the North Coast Land Holdings Project EIR. As described in the North Coast Land Holdings project EIR, the project would continue to comply with Marin County Development Code requirements, including the provision of parkland and/or payment of in-lieu fees pursuant to the Quimby Act, which ensures that any demand for additional recreational facilities is addressed through established regulatory mechanisms. These conditions would remain unchanged under the project refinements.

Because the project refinements would not increase the total number of residents beyond what was analyzed in the EIR, would not reduce the availability of on-site recreational amenities, and would continue to comply with applicable parkland dedication or fee requirements, they would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to construction or expansion of recreational facilities and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact or warrant new or revised mitigation. Also, as it relates to construction or expansion of recreational facilities, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.17 Transportation

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

<b>Transportation</b> Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, or bicycle and pedestrian facilities?	Yes	No	No	N/A	No
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Yes	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Yes	No	No	No	No
d) Result in inadequate emergency access?	Yes	No	No	No	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the proposed project would conflict with a program, plan, ordinance, or policy addressing the circulation system under Impact 3.14-1, of Section 3.14, "Transportation." The proposed project would provide sidewalks, trails, and Class III bicycle routes throughout the project site and to transit stops along U.S. 101. Additionally, the project would not degrade any existing pedestrian or bicycle facilities in the vicinity of the project site. Therefore, the proposed project would not conflict with the County's goals and policies identified in the Countywide Plan or Bicycle and Pedestrian Master Plan related to increasing the use of active transportation in the county. For these reasons, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the transit, bicycle, or pedestrian facilities. This impact would be less than significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

The proposed project refinements would result in similar impacts on pedestrian, bicycle, and transit facilities as the originally proposed project evaluated in the Draft EIR. The refined project would not change the proposed implementation of sidewalks, trails, and Class III bicycle routes throughout the project site and to transit stops along U.S. 101. Additionally, the proposed project refinements include the stipulation that on-site campus enrollees in excess of 325 students shall be required to reside on the project site or accommodated via online learning. Additionally, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered for use by residents in the surrounding Strawberry neighborhood. Thus, it is likely that demand for transit would be reduced as compared to the project as originally proposed. The refined project would not have an adverse effect on pedestrian, bicycle, and transit facilities and impacts would be similar to the original project evaluated in the EIR.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to alternative modes of transportation. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to alternative transportation and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to alternative transportation, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## **b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b) under Impact 3.14-2, of Section 3.14, "Transportation." The Draft EIR identified that construction activities would be short-term and temporary in nature and thus are not expected to result in a significant increase in VMT. Based on the modeling of operational VMT, the academic campus would not exceed the threshold of 30 percent below the existing campus VMT per capita. However, it was determined that the residential uses would exceed the threshold of 30 percent below existing regional average VMT per capita. Therefore, the residential component of the proposed project would conflict and be inconsistent with State CEQA Guidelines Section 15064.3, and the impact was determined to be significant.

### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR identified Mitigation Measures 3.14-2a and 3.14-2b to address impacts on VMT. Implementation of Mitigation Measure 3.14-2a would require the project applicant to develop and implement a Transportation Demand Management Program for the market rate residential uses. However, the proposed residential uses would likely not achieve the required VMT reduction level to meet the threshold of 30 percent below existing average regional VMT per capita. For these reasons, the project's VMT impact would be significant and unavoidable.

### **Consistency Assessment of Project Refinements:**

The project refinements would result in reduced impacts on VMT as the originally proposed project evaluated in the Draft EIR. As detailed in Section 4, "Description of Project Refinements," per the 1953 CUP, there would be no change to the permitted enrollment at the academic campus (i.e., maximum student population of 1,000), and the proposed project refinements include the stipulation that on-site campus enrollees in excess of 325 students shall be required to reside on the project site or accommodated via online learning. Additionally, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered for use to residents in the surrounding Strawberry neighborhood. Based on the proposed reduction in the number of commuting students and fitness center/daycare patrons, the refined project would result in reduced trips, and thus VMT, from the campus uses as compared to the originally proposed project. Therefore, the impact on VMT would be less severe. Although the magnitude of impacts on VMT from the campus uses would be reduced, the project refinements do not propose a dedication of market-rate residential uses or provide for other changes that would result in guaranteed reduced trips or VMT from the residential uses of the project. Therefore, Mitigation Measures 3.14-2a and 3.14-2b would still be required.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to VMT. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR

related to VMT and project-level and cumulative impacts would continue to be significant and unavoidable. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to VMT, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### **c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would substantially increase hazards due to a geometric design feature or incompatible uses under Impact 3.14-3, of Section 3.14, "Transportation." Construction activities may temporarily degrade the surrounding transportation network, inconveniencing pedestrians, bicyclists, and drivers and potentially increasing the risk of safety hazards. Additionally, the streets within the project site do not meet County design standards regarding roadway widths. As planned, the proposed project would not provide adequate parking supply for the academic campus, which could result in parking spill over on surrounding streets where sidewalks and crosswalks do not exist, thus, resulting in potential conflicts between pedestrians and vehicles. For these reasons, the proposed project could substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, this impact would be potentially significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

Implementation of Mitigation Measure 3.14-3a would require the construction contractor to develop and implement a construction traffic control plan to reduce transportation safety impacts during project construction. Mitigation Measure 3.14-3b requires the project applicant to design internal roadways to meet County of Marin design standards, and Mitigation Measure 3.14-3c requires the project applicant to implement parking demand reduction and/or supply measures to meet anticipated demand of the academic campus otherwise campus enrollment could not occur beyond 50 percent. The implementation of the Mitigation Measures 3.14-3a, 3.14-3b, and 3.14-3c would reduce transportation safety impacts exacerbated by the project. Therefore, the impact would be less than significant with mitigation incorporated.

#### **Consistency Assessment of Project Refinements:**

The proposed project refinements would result in similar impacts on transportation hazards as they relate to construction and roadway design as the originally proposed project. As detailed in Section 4, "Description of Project Refinements," the proposed project refinements include the stipulation that on-site campus enrollees in excess of 325 students shall be required to reside on the project site or accommodated via online learning. Additionally, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered for use to residents in the surrounding Strawberry neighborhood. Based on the proposed reduction in the number of commuting students and fitness center/daycare patrons, the refined project would result in a reduction of trips from the campus uses.

The refined project would not result in any changes to adverse effects from construction activities, as the scale and intensity of construction evaluated in the North Coast Land Holdings Project EIR would remain the same and would, therefore, still require implementation of Mitigation Measure 3.14-3a. Similarly, the impact on roadways within the project site, including Hodges Drive and Gilbert Drive, would still occur under the refined project; although, the decrease of project trips would result in the impact being less severe than the originally proposed project. The refined project would still be required to implement Mitigation Measure 3.14-3b.

Based on the proposed reduction in the number of commuting students and fitness center/daycare patrons, the refined project would result in reduced parking demand from the campus uses as compared to the originally proposed project. Therefore, the impact on parking would be less severe. Although the magnitude of impacts on parking from the campus uses would be reduced, the degree to which impacts would be reduced cannot be guaranteed at this time. Therefore, Mitigation Measures 3.14-3c would still be required.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to transportation hazards. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to transportation hazards and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to transportation hazards, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the proposed project would result in inadequate emergency access under Impact 3.14-4, in Section 3.14, "Transportation." In the event of an emergency scenario where evacuation would be necessary, it is anticipated that Seminary Drive and East Strawberry Drive would have the capacity to accommodate vehicles under both existing conditions and with implementation of the proposed project. The proposed project would be designed in compliance with County of Marin design standards and would be subject to review by County staff and emergency service agencies to ensure the project would provide access to emergency vehicles in regard to physical design. The proposed project would also generate trips in the vicinity of the project site resulting in potential delays to vehicles, including emergency response, and potentially impacting emergency access. Therefore, this impact would be potentially significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

Mitigation Measure 3.14-3b would require the project applicant to widen any internal roadways that do not currently meet County roadway width standards. Implementation of Mitigation Measure 3.14-4 would require the project applicant to purchase, install, and activate emergency vehicle preemption devices in the traffic signals at the intersections of Redwood Highway Frontage Road/Seminary Drive and Redwood Highway Frontage Road/US 101 northbound ramps/De Silva Island Drive as well as seven fire station vehicles housed at Southern Marin Fire District Strawberry Fire Station 9. Mitigation Measure 3.14-4 would help maintain vehicular flow during emergency response by prioritizing right-of-way for emergency vehicles traveling from Fire Station 9 to US 101. Mitigation Measures 3.14-3b and 3.14-4 would reduce impacts on emergency access. Therefore, the impact would be less than significant with mitigation incorporated.

#### **Consistency Assessment of Project Refinements:**

The proposed project refinements would result in reduced impacts on emergency access and evacuation as compared to the originally proposed project. As detailed in Section 4, "Description of Project Refinements," per the 1953 CUP, there would be no change to the permitted enrollment at the academic campus (i.e., maximum student population of 1,000), and the proposed project refinements include the stipulation that on-site campus enrollees in excess of 325 students shall be required to reside on the project site or accommodated via online learning. Additionally, the daycare and fitness center would be limited to individuals who live or work on-site. If the fitness

center and daycare facilities do not reach capacity with individuals who live or work on-site, these facilities would be offered for use to residents in the surrounding Strawberry neighborhood. Thus, the refined project would result in reduced trips as compared to the originally proposed project evaluated and fewer people on the peninsula at any given time because fewer students and fitness center/daycare patrons would commute to and from the project site. Therefore, the impact on emergency vehicle access, which was evaluated in the Draft EIR by analyzing vehicle delay, would be less severe because net new peak hour trips would likely be reduced. Similarly, the Draft EIR determined that the roadway system could adequately accommodate the maximum number of people needing to evacuate the Strawberry peninsula at any given time, the reduced number of students physically present on-site as limited by the project refinements would reduce the impact on evacuation as compared to the originally proposed project. Although the magnitude of impacts on emergency access would be reduced; impacts would still be significant and implementation of Mitigation Measures 3.14-3b and 3.14-4 would still be required.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to emergency access and evacuation. In addition, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to emergency access and evacuation and project-level and cumulative impacts would continue to be less than significant with mitigation incorporated. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to emergency access and evacuation, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.18 Tribal Cultural Resources

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Tribal Cultural Resources Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Yes	No	No	No	No
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Yes	No	No	No	No

#### a) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would cause a substantial adverse change in the significance of a tribal cultural resource under Impact 3.3-3 in Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources." Tribal consultation under AB 52 did not result in the identification of tribal cultural resources on the project site; however as mentioned above, precontact archaeological resources are located on the project site. Additionally, excavation activities associated with project construction may disturb or destroy previously undiscovered significant subsurface tribal cultural resources. This impact was found to be potentially significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

The Draft EIR proposed Mitigation Measures 3.3-2 and 3.3-3 to address this potentially significant impact. Implementation of Mitigation Measures 3.3-2 and 3.3-3 would reduce impacts associated with tribal cultural resources to a less-than-significant level because they would require monitoring of known sensitive areas and the performance of professionally accepted and legally compliant procedures for the discovery and protection of previously undocumented significant resources.

**Consistency Assessment of Project Refinements:**

As discussed above, the project refinements would not alter the physical location, design, or overall disturbance area of the proposed project. Additionally, the project refinements would not alter the building materials, building heights or location of proposed buildings in the various planning areas evaluated in the North Coast Land Holdings Project EIR. Thus, as with the proposed project, the project refinements would result in similar impacts related to tribal cultural resources and would not result in new or substantially more severe significant impacts or warrant new or revised mitigation. Therefore, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to tribal cultural resources and project-level and cumulative impacts would continue to be less than significant with mitigation. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to tribal cultural resources, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.19 Utilities and Service Systems

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

Utilities & Service Systems Would the Project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?	Yes	No	No	N/A	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Yes	No	No	N/A	No
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the project’s projected demand in addition to the providers existing commitments?	Yes	No	No	N/A	No
d) Generate solid waste in excess of state or local standards, or otherwise impair the attainment of solid waste reduction goals?	Yes	No	No	N/A	No
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Yes	No	No	N/A	No

**a) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects in Impact 3.15 of Section 3.15, “Utilities and Service Systems.” Implementation of the proposed project would require the construction of utility extensions and expansions to serve the proposed new development. The potential impacts associated with construction of the proposed project, including utilities, have been analyzed throughout the North Coast Land Holdings Project EIR. The proposed project would not require the construction of new or expanded offsite utilities to serve the project’s demand, and no additional utilities beyond those described in Section 2, “Project Description” of the EIR would be required. The installation of these utilities would not result in any additional impacts beyond those disclosed in the EIR. Therefore, this impact would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts associated with the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects, as the originally proposed project. The project refinements related to the academic campus and the daycare and fitness center are focused on student enrollment and membership to the daycare and fitness center facilities and would not alter the physical location, design, proposed drainage infrastructure, grading, or overall disturbance area of the proposed project that could result in additional significant environmental effects beyond those identified in the North Coast Land Holdings Project EIR. Although the project refinements would result in a slight redistribution of residential units throughout the project site, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. Additionally, the total number of residential units proposed would not change and would still involve the development of a total of 337 residential units and thus would not increase utility demand requiring the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities beyond those identified in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, the installation of all utilities for the refined project would comply with applicable requirements of the County Code and would be required to be consistent with all applicable Countywide Plan policies related to utilities and infrastructure.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation associated with the relocation or construction of new or expanded utilities. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to the relocation or construction of new or expanded utilities and impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to the relocation or construction of new or expanded utilities, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years in Impact 3.15-2 of Section 3.15, "Utilities and Service Systems." Construction and operation of the proposed project would increase water demand compared to existing conditions. The additional demand during construction would be temporary and would be minimal compared to Marin Water's annual water demand and would be offset because water would no longer be needed for the displaced uses on the project site (e.g., the existing playfield). Once operational, the project would be connected to the Marin Water distribution system. Based on information in the County's 2023 – 2031 Housing Element and Marin Water's Updated 2020 Urban Water Management Plan (UWMP), there is sufficient water supply to serve the project in normal, single dry year, and multiple dry years. Additionally, the project includes several sustainability features as well as water efficient landscaping and would be required to be consistent with all applicable Countywide Plan policies related to water supply and conservation. Lastly, the County Building and Safety Division

requires project applicants to provide a letter from the appropriate water district regarding availability of water service prior to issuance of a Building Permit. Therefore, this impact would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years as the originally proposed project. The project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. Thus, construction activities associated with the refined project would not result in a greater demand on water supplies than what was evaluated and disclosed in the North Coast Land Holdings Project EIR. Additionally, the refined project would allow for the same number of dwelling units (including affordable units and the residential care facility) and would include all the same components as the originally approved project. As such, the refined project would not change the total number of residential units, the estimated population increase, or the inclusion of the residential care facility; therefore, the overall water demand for the refined project would remain consistent with that previously disclosed in the North Coast Land Holdings Project EIR.

The project refinements would modify certain operational characteristics by limiting the number of commuting students to a maximum of 325 and potentially increasing the proportion of students residing on the project site. This shift would reduce the number of daily vehicle trips associated with commuting to the academic campus and would not increase the total number of on-site residents or structures requiring water. Because demand for water supplies is primarily driven by the number of residents, structures, and specific land uses (such as the residential care facility), rather than the commuting behavior of students, this redistribution of population would not materially increase demand on water supplies beyond what was analyzed in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, the revised project would implement several sustainability features as well as water efficient landscaping. Additionally, the revised project would be required to be consistent with all applicable Countywide Plan policies related to water supply and conservation and obtain a letter from the appropriate water district regarding availability of water service prior to issuance of a Building Permit.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation associated with water supply. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to water supply and impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to water supply, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

### c) Summary of Impacts from the North Coast Land Holdings Project EIR:

The Draft EIR evaluated whether the project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the providers existing commitments in Impact 3.15-3 of Section 3.15, "Utilities and Service Systems." Project construction would result in the temporary generation of wastewater through the use of temporary restroom facilities. However, any wastewater generated in temporary restroom facilities would be hauled away from the project site, and the waste would be disposed of at an approved facility in accordance with 17 CCR 8007. Once operational, the project would result in an increase in wastewater generation compared to existing conditions. However, the increase in daily wastewater generated by the proposed project would represent a minimal contribution (i.e., approximately 2 percent) to the Sewerage Agency of Southern Marin Wastewater Treatment Plant's remaining daily treatment capacity. Additionally, the County Building and Safety Division also requires project applicants to provide a letter from the appropriate sanitary district regarding availability of sewer service, including district certification that a legal connection is available. Furthermore, the proposed project would be required to be consistent with all applicable Countywide Plan policies related to wastewater. Therefore, this impact would be less than significant.

#### Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:

No mitigation measures were required for this impact.

#### Consistency Assessment of Project Refinements:

The project refinements would result in similar impacts related to wastewater treatment capacity as the originally proposed project. As mentioned above, the project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. Thus, construction activities associated with the refined project would not result in greater wastewater generation than what was evaluated and disclosed in the North Coast Land Holdings Project EIR. Additionally, the refined project would allow for the same number of dwelling units (including affordable units and the residential care facility) and would include all the same components as the originally approved project. As such, the refined project would not change the total number of residential units, the estimated population increase, or the inclusion of the residential care facility; therefore, the overall wastewater generation for the refined project would remain consistent with that previously disclosed in the North Coast Land Holdings Project EIR.

The project refinements would modify certain operational characteristics by limiting the number of commuting students to a maximum of 325 and potentially increasing the proportion of students residing on the project site. This shift would reduce the number of daily vehicle trips associated with commuting to the academic campus and would not increase the total number of on-site residents or structures requiring water. Because wastewater generation is primarily driven by the number of residents, structures, and specific land uses (such as the residential care facility), rather than the commuting behavior of students, this redistribution of population would not materially increase wastewater generation beyond what was analyzed in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, the revised project would be required to be consistent with all applicable Countywide Plan policies related to wastewater and obtain a letter from the appropriate sanitary district regarding availability of sewer service.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation associated with wastewater treatment capacity. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to wastewater treatment capacity and impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to wastewater treatment capacity, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

#### **d-e) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would generate solid waste in excess of state or local standards, or otherwise impair the attainment of solid waste reduction goals and whether the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste in Impact 3.15-4 of Section 3.15, "Utilities and Service Systems." Construction and demolition activities associated with the proposed project would generate solid waste, including metals, plastics, wood, concrete, and other building materials. However, construction of the proposed project would be required to comply with applicable waste diversion requirements, including CALGreen Divisions 4.4 and 5.4. Once operational, the proposed project would generate solid waste that would need to be disposed of at the Redwood Landfill and Recycling Center. However, the solid waste generated by the proposed project would represent a minimal contribution (i.e., 0.09 percent) solid waste currently disposed of daily at the Redwood Landfill and Recycling Center, and therefore would not contribute to an exceedance of the landfill's permitted daily disposal capacity. Additionally, the proposed project would be required to be consistent with all applicable Countywide Plan policies related to solid waste and comply with all applicable state and local management and reduction statutes and regulations related to solid waste, including AB 939, AB 341, AB 1826, and Chapter 7 of the Marin County Code. Therefore, solid waste impacts would be less than significant.

#### **Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

#### **Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to solid waste generation as the originally proposed project. As mentioned above, the project refinements would not result in any changes to the type, magnitude, or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. Thus, demolition and construction activities associated with the refined project would not result in greater solid waste generation than what was evaluated and disclosed in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, construction of the refined project would be subject to compliance with applicable waste diversion requirements, including CALGreen Divisions 4.4 and 5.4. Additionally, the refined project would allow for the same number of dwelling units (including affordable units and the residential care facility) and would include all the same components as the originally approved project. As such, the refined project would not change the total number of residential units, the estimated population increase, or the inclusion of the residential care facility; therefore, the overall solid waste generation for the refined project would remain consistent with that previously disclosed in the North Coast Land Holdings Project EIR.

The project refinements would modify certain operational characteristics by limiting the number of commuting students to a maximum of 325 and potentially increasing the proportion of students residing on the project site. This shift would reduce the number of daily vehicle trips associated with commuting to the academic campus and would not increase the total number of on-site residents or structures requiring water. Because solid waste generation is primarily driven by the number of residents, structures, and specific land uses (such as the residential care facility), rather than the commuting behavior of students, this redistribution of population would not materially increase solid waste generation beyond what was analyzed in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, the revised project would be required to be consistent with all applicable Countywide Plan policies related to solid waste and comply with all applicable state and local management and reduction statutes and regulations related to solid waste, including AB 939, AB 341, AB 1826, and Chapter 7 of the Marin County Code.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation associated with solid waste generation. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to solid waste generation and impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to solid waste generation, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

## 4.1.20 Wildfire

### ENVIRONMENTAL CHECKLIST AND DISCUSSION

<b>Wildfire</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project...	Do the proposed project refinements sustain an accurate, stable, and finite project description related to this impact?	Do the proposed project refinements result in a new or substantially more severe significant impact?	Do any changes in the environmental setting result in a new or substantially more severe significant impact?	Do the proposed project refinements warrant revision to a mitigation measure?	Do the proposed project refinements add any significant new information requiring recirculation of the Draft EIR, as defined by State CEQA Guidelines Section 15088.5?
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?  b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?  c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?  d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?					

**a) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would impair an adopted emergency response plan or emergency evacuation plan in Impact 3.8-4 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." See discussion under Section 5.1.10(f) of this document.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

See discussion under Section 5.1.10(f) of this document.

**b) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would exacerbate wildfire risk and expose project occupants to pollutant concentrations or people or structures to significant loss, injury or death involving wildfire in Impact 3.8-5 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." According to the FHSZ maps for Marin County, the project site and surrounding area are within a Local Responsibility Area (LRA) and are designated as "urban, unzoned". There are no Moderate, High, or Very High Fire Hazard Severity Zones (FHSZ) mapped within or surrounding the project site. In

addition, the project site is not located within or adjacent to the Wildland Urban Interface (WUI). Although the project site is not within or adjacent to WUI areas or a Moderate, High, or Very High FSHZ, the project site supports fire-prone vegetation, including dead and declining tree species, scrub habitat, and grasslands. As such, the project site is subject to the potential risk of wildfire. However, the implementation of vegetation management procedures and the maintenance of defensible spaces would reduce the existing level of potential wildfire risk at the project site, resulting in a net benefit with respect to this issue. Therefore, this impact would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to exacerbating wildfire risk and exposing project occupants to pollutant concentrations or people or structures to significant loss, injury or death involving wildfire as the originally proposed project. The project refinements would not result in any changes to the type or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. Construction of the refined project would be subject to compliance with the CBC and California Fire Code, which establish requirements including proper storage procedures for combustible materials and the proper refueling protocol. Additionally, construction of the refined project would be subject to compliance with PRC Section 4427, which includes various fire safety requirements for construction equipment.

In addition, the refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. The project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area to no more than four stories of habitable space. However, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR and would not extend into any undeveloped areas that could exacerbate wildfire risk beyond those evaluated in the EIR. As such, the refined project would not extend into areas designated as Moderate, High, or Very High FHSZs or the WUI. Similar to the originally proposed project, the refined project would implement vegetation management procedures and maintain defensible spaces that would reduce the existing level of potential wildfire risk at the project site.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to exacerbating wildfire risk and exposing project occupants to pollutant concentrations or people or structures to significant loss, injury or death involving wildfire. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to wildfire and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to related to wildfire, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**c) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment in Impact 3.8-6 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." Wildfire-related infrastructure associated with the proposed project would include fuel breaks and vegetation management. The effects of the installation or maintenance of wildfire-related infrastructure on other environmental resources are addressed in the applicable resource sections throughout this EIR and are considered as part of the overall development of the proposed project. The effects associated with installation or maintenance of such infrastructure are varied and may affect certain resources, including biological resources. However, the implementation of fuel breaks and vegetation management would not exacerbate wildfire risk, but rather would reduce the existing level of wildfire risk at the project site, resulting in a net benefit with respect to this issue. Therefore, this impact would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to exacerbating wildfire risk from the installation or maintenance of associated infrastructure as the originally proposed project. The project refinements would not result in any changes to the type or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. Additionally, the project refinements would not result in any changes to the onsite circulation network, including the construction of new or extended roadways, beyond the changes evaluated in the North Coast Land Holdings Project EIR. Similar to the originally proposed project, the refined project would implement vegetation management procedures and maintain defensible spaces that would reduce the existing level of potential wildfire risk at the project site. The potential effects associated with installation or maintenance of such infrastructure would be the same as those evaluated in the North Coast Land Holdings Project EIR for the originally proposed project.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to exacerbating wildfire risk from the installation or maintenance of associated infrastructure. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to wildfire and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to related to wildfire, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and conclusions of the North Coast Land Holdings Project EIR.

**d) Summary of Impacts from the North Coast Land Holdings Project EIR:**

The Draft EIR evaluated whether the project would expose people or structures to significant post-wildfire hazards in Impact 3.8-7 of Section 3.8, "Hazards, Hazardous Materials, and Wildfire." The project site and surrounding area are not in or near a State Responsibility Area (SRA) but are within an LRA and are designated as "urban, unzoned" according to the FHSZ maps for Marin County. There are no Moderate, High, or Very High FHSZs mapped within or surrounding the project site. In addition, the project site is not located within or adjacent to the WUI. However, the project site supports fire-prone vegetation, including dead and declining tree species, scrub habitat, and grasslands.

As such, the potential risk of wildfire already exists at the project site. The proposed project includes the establishment of defensible safe zones, including 30-foot and 100-foot fuel management zones, as well as the removal of dead and declining trees from the project site, some of which are protected species under the County Code. These changes in existing conditions would make the project site safer from a fire risk standpoint than it currently is, resulting in a net benefit with respect to this issue. This impact would be less than significant.

**Summary of Mitigation Measures from the North Coast Land Holdings Project EIR:**

No mitigation measures were required for this impact.

**Consistency Assessment of Project Refinements:**

The project refinements would result in similar impacts related to exposing people or structures to significant post-wildfire hazards as the originally proposed project. The project refinements would not result in any changes to the type or amount of development and associated construction activities that could occur on the project site compared to the originally proposed project. In addition, the refined project would allow for the same number of dwelling units (including affordable units) and would include all the same components as the originally approved project. Although the project refinements would result in a slight redistribution of residential units throughout the project site as a result of the limitation in allowable buildings heights in the Hodges/Shuck Planning Area, these units would be redistributed within the development footprint and disturbance area evaluated in the North Coast Land Holdings Project EIR. As such, they would not result in the additional exposure of people or structures to significant post-wildfire hazards beyond what was evaluated in the EIR. Similar to the originally proposed project, the refined project would implement vegetation management procedures and maintain defensible spaces that would reduce the existing level of potential wildfire risk at the project site.

Therefore, the project refinements would not result in any new or more substantially more severe significant impacts or warrant new or revised mitigation related to exposing people or structures to significant post-wildfire hazards. Additionally, the project refinements would not alter the nature and magnitude of impacts or significance determinations disclosed in the North Coast Land Holdings Project EIR related to wildfire and project-level and cumulative impacts would continue to be less than significant. Moreover, no substantial changes in the environmental setting have occurred that would result in a new or substantially more severe significant impact. Also, as it relates to related to wildfire, the project refinements reflect a stable project description because they would maintain the basic project objectives and would not alter the proposed land uses, number of proposed dwelling units, land use intensity, infrastructure or overall project footprint, nor would they change the significance conclusions disclosed in the North Coast Land Holdings Project EIR or limit the public's ability to meaningfully comment on environmental impacts.

For these reasons, the project refinements (1) would sustain an accurate, stable, and finite project description related to this impact; (2) would not result in a new or substantially more severe significant impact, including as a result of changes in the environmental setting; (3) would not warrant revisions to a mitigation measure; and (4) would not add any significant new information requiring recirculation of the Draft EIR. Therefore, the project refinements would be consistent with the analysis and findings of the North Coast Land Holdings Project EIR.

## 4.1.21 Conclusion

As described in Section 4 of this document, "Description of Project Refinements," and analyzed in Section 5, "Consistency Assessment," the project refinements would sustain an accurate, stable, and finite project description because they would not alter the fundamental characteristics of the proposed project, including land uses, number of proposed dwelling units, development intensity, site layout, infrastructure, or overall project footprint as evaluated in the North Coast Land Holdings Project EIR. Rather, the project refinements primarily clarify and refine operational details—such as limiting the number of commuting students—without increasing the total number of residential units, population, or physical development potential of the project site. Accordingly, the project refinements do not introduce new or materially different impacts beyond those previously analyzed.

As demonstrated in the environmental resource-specific evaluations presented in Section 5, "Consistency Assessment," the project refinements do not significantly change the assumptions underlying impact conclusions and would either maintain or reduce the intensity of certain impacts, such as vehicle trips and off-site housing demand, while keeping overall population and development levels consistent with those analyzed in the North Coast Land Holdings Project EIR. Thus, the project refinements would not result in new or substantially more severe significant impacts compared to the originally proposed project. The project refinements also would not warrant revisions to any mitigation measures required as part of the North Coast Land Holdings Project EIR and would not increase the severity of any previously identified significant impacts, nor would they introduce new significant impacts that would require additional mitigation. All previously required mitigation measures remain applicable and effective, and no new or modified mitigation measures are necessary.

In addition, the project refinements do not add significant new information of substantial importance that would require recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5. The refinements do not involve a new significant environmental impact, a substantial increase in the severity of an identified impact, or a feasible mitigation measure or alternative considerably different from those previously analyzed that would clearly lessen environmental effects. Furthermore, the refinements do not deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible mitigation measure or alternative.

Therefore, the differences between the proposed project, as described in the North Coast Land Holdings Project EIR, and the project refinements now being considered are consistent with the findings and conclusions of the North Coast Land Holdings Project EIR, sustain a stable project description, and do not trigger recirculation of the North Coast Land Holdings Project EIR pursuant to State CEQA Guidelines Section 15088.5.

## 5 REFERENCES

- California Department of Conservation. 2022a. Farmland Mapping & Monitoring Program. Available: <https://www.conservation.ca.gov/dlrp/fmmp>. Accessed on October 20, 2022.
- . 2022b. California Williamson Act Enrollment Finder. Available: <https://gis.conservation.ca.gov/portal/apps/webappviewer/index.html?id=180acf4745ff40a5a764c65a4a8278eb>. Accessed on October 20, 2022.
- California Department of Finance. 2025 (January 1). Table 2: E-5 City/county Population and Housing Estimates, 1/1/2025. Sacramento, CA. Available: <https://dof.ca.gov/forecasting/demographics/estimates/>. Accessed August 26, 2025.
- California Department of Toxic Substances Control. 2023. *EnviroStor Map*. Available: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=201+seminary+drive>. Accessed October 6, 2023.
- California Department of Transportation. 2022. California Scenic Highway System Map. Available: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed August 23, 2022.
- California Ocean Protection Council. 2018. *State of California Sea-Level Rise Guidance*.
- CSW/Stuber-Stroeh Engineering Group, Inc. 2021 (November). *Hydrology and Hydraulic Study for The Seminary*. Novato, CA.
- CSW|ST2. See CSW/Stuber-Stroeh Engineering Group, Inc.
- Department of Conservation. See California Department of Conservation.
- DOF. See California Department of Finance.
- DTSC. See California Department of Toxic Substances Control.
- Caltrans. See California Department of Transportation.
- Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*. U.S. Department of Transportation Federal Transit Administration. Washington, DC. Prepared by John A. Volpe National Transportation Systems Center.
- FTA. See Federal Transit Administration.
- Marin County. 2023. *Marin Communitywide Plan*. Adopted November 6, 2007. Revised on January 24, 2023. Prepared by the Marin County Community Development Agency. Available: <https://www.marincounty.gov/departments/cda/planning/plans-policies-and-regulations/marin-countywide-plan>. Accessed March 19, 2026.
- National Cooperative Highway Research Program. 1999. *Mitigation of Nighttime Construction Noise, Vibration, and Other Nuisances. A Synthesis of Highway Practice*. Synthesis 218. Transportation Research Board. National Research Council. Federal Highway Administration.
- NCCHP. See National Cooperative Highway Research Program.
- OPC. See California Ocean Protection Council.
- Purcell, Rhoades & Associates. 2016 (June 8). Preliminary Geotechnical Design Report, The Seminary, 201 Seminary Drive, Mill Valley, California. Prepared for North Coast Land Holdings.
- Purcell, Rhoades & Associates. 2010 (August 23). Stage 1 Feasibility Study, Golden Gate Baptist Theological Seminary, Master Plan Amendment, Mill Valley, California. June 22, 2010. Amended August 23, 2010.
- SWRCB. See State Water Resources Control Board.

State Water Resources Control Board. 2023. Geotracker. Available: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=201+Seminary+Drive+>. Accessed October 6, 2023.

University of California Museum of Paleontology. 2023. University of California Museum of Paleontology Specimen Search. Available: <https://ucmpdb.berkeley.edu/>. Accessed February 27, 2023.

UCMP. See University of California.