

MEMORANDUM

TO: Marin County Planning Commission

DATE: February 27, 2026

FROM: Rachel Reid, Environmental Coordinator
Michelle Levenson, Principal Planner

SUBJECT: North Coast Land Holdings LLC
Community Plan Amendment, Master Plan, Design Review,
Tree Removal Permit, Master Use Permit and Vesting Tentative
Map, and Certification of the Environmental Impact Report (EIR)
201 Seminary Drive, community of Strawberry, Mill Valley
Assessor 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 twofold: (1) to provide a Final Environmental Impact Report (Final EIR) Amendment that presents comments received on the North Coast Land Holdings Project Final EIR and responses to those select comments that present new environmental topics not previously raised on the Draft EIR and addressed in the Final EIR; and (2) provide public comments on the project and EIR since publication of the staff report and recommended resolutions. The comments provided were received by 10:00am on February 26, 2026. Public comments received after 10:00am on February 26, 2026, will be provided to the Planning Commission the day of the hearing, March 2, 2026.

ATTACHMENTS:

1. North Coast Land Holdings Final EIR Amendment
2. Public comments

Memo



455 Capitol Mall, Suite 300
Sacramento, CA 95814
916.444.7301

Date: February 26, 2026

To: Rachel Reid, Environmental Planning Manager
Marin County Community Development Agency

From: Tanya Jones, Senior Project Manager
Curtis E. Alling, AICP, Principal

Subject: **Final EIR Amendment - Comments Relevant to CEQA Compliance Received on the North Coast Land Holdings Master Plan and Community Plan Amendment Project Final Environmental Impact Report and Responses to Comments (SCH No. 2020090488)**

This memo presents select comments received on the North Coast Land Holdings Master Plan and Community Plan Amendment Project Final Environmental Impact Report (EIR), SCH No. 2020090488 that raise issues pertaining to the scope of the California Environmental Quality Act (CEQA) and provides responses to those comments that raise new environmental topics not previously raised on the Draft EIR and addressed in the Final EIR. This memo serves as an amendment to the Final EIR. The Final EIR consists of the Draft EIR (published on July 16, 2024); the Final EIR Volume (published on December 12, 2025), which includes public comments on the Draft EIR, responses to comments, and text revisions to the Draft EIR; and this memo (Final EIR Amendment). The full set of comments on the Final EIR are provided in Attachment A to this memo. If comments on the Final EIR repeat topics raised in the Draft EIR or express an opinion about the merits of the project, they are important for consideration by the Planning Commission and Board of Supervisors, but there is no need for additional response herein for purposes of CEQA compliance.

On December 12, 2025, the Final EIR and a notice of availability of the Final EIR for review were distributed to members of the Planning Commission, Board of Supervisors, State Clearinghouse, state and local agencies and special districts, and other interested groups and individuals for a public comment period ending on January 26, 2026. During the public comment period, nine comment letters were received from local organizations and individuals. On February 4, 2026, two additional comment letters were received from individuals, and on February 17, 2026, one additional comment letter was received from an individual.

Responses to comments in this memo explain how environmental topics raised are addressed in the EIR, elaborate descriptions of analysis and conclusions, and/or reference the location of pertinent information in the EIR. As discussed below, none of the comments or responses alter the conclusions of the EIR with respect to the significance of any impact or the need for or feasibility of mitigation measures; no revisions to the EIR are needed.

The public comments are reproduced in this memo verbatim as they were submitted. If the comments contain spelling, grammatical, and other errors, they were present in the original comment sources and have been retained.

ORGANIZATIONS

Letter F/O1 Marin Conservation League

Mike Swezy, President

Kate Powers, Co-Chair, Land Use Transportation and Water Committee

January 20, 2026

Comment F/O1-1

As we previously commented, the DEIR project description for the academic campus merely repeats what would have been permitted under the County-approved 1953 Conditional Use Permit (CUP), which broadly specifies an educational campus for up to 1,000 students supported by faculty and staff. In 1953, the Seminary property covered a larger area (before portions of the original property were allowed to be sold off for market-rate residential development under the Seminary Master Plan approved by the County in 1983). Consequently, the DEIR analysis of the topic areas for this component of the project presents broad findings that are lacking in factual detail. MCL acknowledges that at the present time, there is no specific academic institution that is proposing tenancy and operation of the campus, which would offer more specific details for analysis. Nonetheless, without more specific details of the academic institution being described, the impacts of this major use component of the project cannot be adequately analyzed at a project level

review. The physical environmental impacts vary dramatically by the type of academic institution, the activities and any new facilities proposed. For example, a small higher-level education college campus with onsite student housing would have dramatically different transportation impacts, and consequently air quality and GHG impacts, than a commuter-type college campus or a private K-12 school serving the Marin County community.

In response to this issue, County staff has positioned that the academic campus use component is not a part of the Seminary project and is therefore not subject to CEQA analysis under this environmental document. However, the project description in the DEIR and project updates presented in the FEIR clearly include the academic campus component. The academic campus is presented in both the project description text and all the supportive graphics depicting the site area and site improvements. Therefore, it is part of the whole of the Seminary project site.

The lack of detail and uncertainty regarding the academic campus use, coupled with the position that this use is not a part of the Seminary project raises the question of "piecemealing" the environmental review process. Piecemealing involves the impermissible breaking up of a project into smaller pieces in a way that obscures the full environmental impact of the project. The California Environmental Quality Act (CEQA) defines a "project" broadly to encompass the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Without a detailed description of the academic campus, there are consequences in overlooking the collective and cumulative effect of the whole of the action on the Seminary project.

Response F/O1-1

The comment reiterates issues previously raised in Final EIR Comment O3-2 and also summarizes the response provided in Final EIR Response O3-2. The comment also asserts without evidence that Marin County (County) does not consider the academic campus to be part of the proposed project and raises concerns regarding piecemealing the environmental review process.

The Final EIR clearly includes the academic campus as a component of the proposed project. As explained in Final EIR Section 3.2.1, "Master Response: Stable Project Description," the EIR properly defines the proposed project for CEQA purposes based on the physical development envelope, land use parameters, and intensity limits that are reasonably foreseeable at this time. The academic campus component is included in Draft EIR Chapter 2, "Project Description," and is consistent with the 1953 Conditional Use Permit (CUP), which allows for an academic campus operation with

enrollment of up to 1,000 students supported by faculty and staff. As explained in Draft EIR Chapter 2, "Project Description," and Final EIR Section 3.2.4, "Master Response: Conditional Use Permit Issues," operation of the academic campus under the proposed project would be similar to historical campus operations and would not expand beyond the limits of the existing CUP. The academic campus would continue to be occupied by an institute of higher education, such as a university or college, with no change proposed to the scope of the existing 1953 CUP, including the maximum permitted enrollment of 1,000 higher education students.

As acknowledged in the EIR and discussed in Final EIR Section 3.2.1, "Master Response: Stable Project Description," and Final EIR Response O3-2, the level of detail about the proposed project provided in the Draft EIR fully satisfies applicable CEQA standards. A project description in an EIR need only include "[a] *general description* of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities" (State CEQA Guidelines Section 15124[c], italics added). In addition, CEQA does not require an EIR to identify a specific end user; rather, identifying a proposed land use is sufficient. The EIR therefore evaluates the type of educational use (i.e., higher education facility campus), the intensity of use (i.e., enrollment maximum of 1,000 students), and the proposed physical changes to the campus (i.e., renovation and expansion of administrative facilities, but not an increase in classroom capacity), which presents sufficient information for determining reasonably foreseeable environmental effects of the proposed campus element of the master plan.

The EIR does not exclude the academic campus from CEQA review. To the contrary, the academic campus area is shown on project plans and figures, and its physical improvements, as well as maximum enrollment potential, are included in the environmental analysis. Thus, the EIR does not segment the academic campus from the remainder of the project, nor does it postpone analysis of its physical development.

The comment's assertion of piecemealing conflates uncertainty regarding a future tenant with improper segmentation of a project. The EIR evaluates the whole of the project including improvements to and operation of the academic campus based on the reasonably foreseeable physical development associated with the proposed master plan. Consistent with State CEQA Guidelines Section 15162, if a future academic tenant were to propose activities or physical improvements that substantially exceed the development envelope, land use intensity, or environmental effects analyzed in the EIR, the County would be required to evaluate whether additional environmental review is warranted at the time of the next relevant discretionary action. This reflects CEQA's standard framework for addressing future changes to an approved project and does not indicate that the current analysis is incomplete or improperly deferred. Accordingly, the EIR's treatment of the academic campus does not constitute piecemealing. The academic campus is fully included within the scope of the project analyzed, and the environmental review appropriately addresses its reasonably foreseeable physical impacts. No revisions to the EIR are warranted in response to this comment.

Letter F/O2 Seminary Neighborhood Association

Riley F. Hurd III

January 26, 2026

Comment F/O2-1

1. PM2.5 Post-Mitigation Calculation Is Missing

Dispersion modeling found the project would increase annual average PM2.5 concentration by 2.67 $\mu\text{g}/\text{m}^3$, which exceeds BAAQMD's threshold of 0.3 $\mu\text{g}/\text{m}^3$ by nearly nine times. The EIR claims Tier 4 engines achieve an 88% reduction, but that figure applies to diesel exhaust cancer risk, not PM2.5 concentration, which includes fugitive dust from grading and earthwork that Tier 4 engines do not address. No post-mitigation PM2.5 calculation appears anywhere.

Sources: Final EIR pp. 120, 582; Draft EIR pp. 156, 170; CEQA Guidelines §15126.2, §15126.4

Response F/O2-1

The comment states that no post-mitigation PM_{2.5} calculations appear in the EIR related to fugitive dust from grading and earthwork not pertinent to Tier 4 engines. While the findings of the EIR and the efficacy of the use of Tier 4 engines as required by Mitigation Measure 3.2-1 pertain specifically to exhaust PM_{2.5} emissions and do not account for fugitive dust PM_{2.5}, dust is evaluated and mitigated in the Final EIR. Fugitive dust PM_{2.5} is addressed by the Bay Area Air District's (the Bay Area Air Quality District [BAAQMD] changed its name to Bay Area Air District in January 2025) fugitive dust best management practices. The cited language of the Final EIR in the comment addresses impacts from exposure of high concentrations of toxic air contaminants (TACs), as addressed in Impact 3.2-3 of the Draft EIR. As discussed in Appendix C of the Draft EIR, a health risk assessment (HRA) was conducted to assess potential adverse effects of diesel PM and PM_{2.5}, and demonstrates that with the implementation of Mitigation Measure 3.2-1, PM_{2.5} would be reduced to below the Bay Area Air District's threshold of 0.3 µg/m³. The contours of PM_{2.5} are depicted in Figure 4 of Appendix C, which show that Mitigation Measure 3.2-1 and the application of the Bay Area Air District's fugitive dust best management practices would be sufficient to minimize this impact for both exhaust and fugitive dust PM_{2.5}. No revisions to the EIR are required in response to this comment.

Comment F/O2-2

2. Road Widening Impacts Were Not Analyzed

The EIR requires road widening as a mitigation measure—expanding roads from their current 20-28 feet to 36-40 feet minimum. This represents an additional 12-20 feet of width across the internal road network. The document contains no analysis of the environmental implications of this physical change.

Road widening of this magnitude involves tree removal, additional grading and earthwork, and thousands of additional square feet of impervious surface affecting stormwater runoff. A commenter raised this exact issue during public review, noting that "road widening could have secondary environmental impacts." The County's response clarified which roads would be widened but did not analyze the impacts. CEQA Guidelines Section 15126.4(a)(1)(D) requires that when a mitigation measure causes environmental effects, those effects must be discussed.

Sources: Draft EIR pp. 426-427; Final EIR p. 105 (Response O3-9); Marin County Code §24.04.110; CEQA Guidelines §15126.4(a)(1)(D)

Response F/O2-2

The comment states the EIR did not evaluate the impacts of Mitigation Measure 3.14-3b ("Widen Roads to Meet County of Marin Roadway Standards and ADA and PROWAG Guidelines for Transportation Accessibility") and references Final EIR Response O3-9, which clarified the roads that would be widened but did not analyze the impacts.

As discussed in the Draft EIR and Final EIR, the environmental analysis for the project is based on the full development envelope and maximum disturbance area reasonably foreseeable for the project, including internal circulation improvements necessary to meet County fire, emergency access, and roadway design standards. The potential for roadway widening within the project site was contemplated as part of this development/disturbance envelope, and the EIR's analyses of aesthetics, biological resources, geology, hydrology, and other resource areas are based on the maximum reasonable extent of grading, vegetation removal, and impervious surface associated with project development. This method incorporates environmental impacts related to meeting the County roadway design standards.

Although the EIR identifies roadway widening as a mitigation measure to achieve compliance with County access and safety standards, detailed engineering design for roadway widening is not required nor to be approved at this Master Plan stage. CEQA compliance for a Master Plan decision involves evaluation of the location, general layout, grading, and resulting disturbance area of proposed infrastructure and development, but does not require detailed engineering drawings or precise roadway cross-sections. Instead, the Final EIR meets CEQA requirements with an analysis of reasonably foreseeable physical changes determined to occur based on the Master Plan. Thus, by

evaluating the environmental effects of the maximum disturbance footprint of the Master Plan, in includes disturbance where roadway improvements would occur.

State CEQA Guidelines Section 15126.4(a)(1)(D) requires analysis of secondary impacts of mitigation measures where those impacts are not otherwise addressed. In this case, the EIR's environmental analyses already account for the types of physical changes associated with roadway improvements. Because roadway widening would not exceed the analyzed disturbance area or change the scale or magnitude of impacts disclosed, no additional or separate analysis is required. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-3

3. Retaining Wall Impacts Were Not Evaluated

The project description assumes "unretained slopes," but the geology mitigation measure explicitly identifies retaining walls as a "typical" remedy for slope instability. These walls could reach 30 feet in height. A vertical retaining wall of this scale presents fundamentally different visual and biological impacts than a graded slope. The EIR's visual and biological assessments were based on graded slopes. Retaining walls are identified as a reasonably foreseeable outcome, yet their impacts are not analyzed anywhere in the document.

Sources: Draft EIR pp. 259, 262-263; CEQA Guidelines §15126.4(a)(1)(D)

Response F/O2-3

The comment asserts that the EIR improperly assumes "unretained slopes" while also identifying mitigation that includes the use of retaining walls to minimize impacts related to slope instability, and failed to analyze the visual and biological impacts of retaining walls.

The Draft EIR project description and impact analyses are based on the maximum grading envelope and slope geometry reasonably foreseeable for the project, including the creation of engineered berms and slopes with heights of up to approximately 25 to 30 feet (located around the existing playfield). These conditions are disclosed and analyzed in Section 3.1, "Aesthetics"; Section 3.4, "Biological Resources"; and Section 3.6, "Geology and Soils," of the Draft EIR. Moreover, Mitigation Measures 3.6-2 and 3.6-4 do not mandate the use of retaining walls, nor do they assume their use as a default design feature. Instead, the measures identify a range of standard geotechnical remedies that may be employed if localized instability is encountered during final design, including surface and subsurface drainage features; soil stabilization techniques such as surcharging, compaction, or geosynthetic reinforcement; slope contouring; creating terraces or stepped slopes; replanting of stabilizing vegetation; and other methods as deemed acceptable to the County.

Regarding the visual impacts analysis, Impact 3.1-1 ("Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality") in Section 3.1, "Aesthetics," of the Draft EIR considered changes in landform, slope height, and overall massing based on the maximum grading and berm heights anticipated for the project. A retaining wall constructed within that same vertical envelope would not increase the height, bulk or extent of visible disturbance beyond what was already disclosed and analyzed. Whether the slope is expressed as a graded face or partially supported by a retaining structure, the overall scale, location, and visual footprint remain within the parameters evaluated in the Draft EIR. Thus, the potential use of retaining walls does not introduce a new or fundamentally different visual impact than those disclosed in the Draft EIR and does not alter the conclusions of the visual impact analysis.

Similarly, the biological resources impacts analysis also considered the maximum area of ground disturbance and vegetation removal associated with project grading and slope construction. The use of a retaining wall, if required, would generally reduce, rather than expand, the area of disturbance by minimizing the horizontal footprint of grading compared to a fully graded slope. As a result, retaining structures would not increase the extent of biological impacts beyond those already analyzed and mitigated in the Draft EIR.

CEQA requires an EIR to analyze reasonably foreseeable impacts at a level of detail appropriate to the stage of project approval, not to provide final engineering designs. The Draft EIR disclosed the maximum slope heights and

grading extents, analyzed the associated visual and biological impacts, and adopted mitigation measures to address those impacts. The geology mitigation measures allow for refinement of slope stabilization methods during final design but do not improperly defer impact analysis or mitigation in violation of State CEQA Guidelines Section 15126.4(a)(1)(D).

Because the Draft EIR evaluated the full scale and magnitude of slope-related disturbance—including berms up to approximately 30 feet in height—and because retaining walls would not increase impacts beyond those disclosed, no additional analysis is required. The EIR adequately addresses the potential use of retaining structures, and no revisions to the EIR are warranted in response to this comment.

Comment F/O2-4

4. Carbon Offsets Were Incorrectly Deemed Infeasible

The EIR concludes that carbon offsets are "administratively infeasible" because Marin County lacks its own offset program. CEQA Guidelines Section 15126.4(c) explicitly lists "off-site measures, including offsets" as a valid way to mitigate greenhouse gas emissions. The EIR does not claim offsets are ineffective or unavailable—only that the County hasn't created its own program to administer them. That is not infeasibility; that is an administrative choice. The project's GHG impact is classified as Significant and Unavoidable, yet a CEQA-endorsed mitigation measure is being dismissed because of the County's administrative choices.

Sources: Draft EIR p. 279; CEQA Guidelines §15126.4(c)

Response F/O2-4

The comment asserts that the EIR's conclusion that carbon offsets are "administratively infeasible" because the County lacks its own offset program is not infeasibility but is an administrative choice. State CEQA Guidelines Section 15126.4(c) stipulates that lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas (GHG) emissions. Although as indicated in the comment, State CEQA Guidelines Section 15126.4(c)(3) identifies off-site measures, including offsets, as acceptable for mitigating a project's significant GHG emission impacts, the Draft EIR discloses in Section 3.7, "Greenhouse Gas Emissions and Climate Change Vulnerability," that it cannot be ensured that Mitigation Measure 3.7-1b is feasible at this time. Mitigation Measure 3.7-1b may be infeasible because the cost or availability of offsets that meet the criteria of being real, quantifiable, permanent, verifiable, and enforceable, and the GHG emission reductions otherwise required by law or regulation are unknown. Additionally, Marin County has no identifiable GHG emission offset policy or program that has been codified or adopted for development purposes, nor does the County have an enforceable monitoring mechanism to ensure offsets would be verifiable, permanent, and enforceable for the life of the project (see *Golden Door Properties v. County of San Diego* [2020] 50 Cal.App.5th 467). If a County policy and implementation program do not exist at the time of project consideration for approval, offset implementation would lack the necessary legally defined, objective performance standards and enforceable oversight. In this circumstance, without an adopted County program and implementing ordinance requiring compliance with the program, administrative infeasibility is essentially infeasibility of legal enforcement. Legal factors are noted in the definition of "feasible" in Section 15364 of the State CEQA Guidelines.

However, and as stated in Mitigation Measure 3.7-1b, if at the time of the project's consideration for approval by the Board of Supervisors, Marin County has adopted a GHG offset policy and implementation program, the applicant shall define offsets that feasibly meet the County program requirements and state protocols and standards. Such credits shall comply with protocols approved by the California Air Resources Board (CARB), consistent with Section 95972 of Title 17 of the California Code of Regulations. Credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) through the California Air Pollution Control Officers Association's (CAPCOA's) GHG Rx and Bay Area Air District, if available. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-5**5. VMT Mitigation Lacks Enforceable Standards**

The original draft specified that the TDM program "shall attempt to achieve" a 39% reduction. The revised measure replaced this with "achieve the maximum feasible trip reduction." Neither formulation can be enforced—there is no way to verify compliance with an "attempt" or to measure "maximum feasible." The revision removed the specific 39% target while retaining unmeasurable language. The listed TDM strategies use "may include" phrasing, making them discretionary rather than mandatory. CEQA Guidelines Section 15126.4(a)(2) requires mitigation to be "fully enforceable through permit conditions, agreements, or other measures." This measure is not. 1. The EIR proposes no mitigation for the campus service population of 1,240 students and support personnel, estimating that the VMT per capita exactly equals the CEQA guidelines of a 30% reduction. There is no after-the-fact evaluation that this VMT will be met. Considering the 10-fold increase in service population and impact that will have on total VMT, the County should require the campus VMT per service population be assessed annually after the project is in place and require the project applicant to meet the CEQA guidelines.

Sources: Draft EIR p. 424; Final EIR pp. 70-71, 563-564; CEQA Guidelines §15126.4(a)(2)

Response F/O2-5

The comment mischaracterizes Mitigation Measure 3.14-2a, incorrectly stating that Mitigation Measure 3.14-2a was revised to remove the 39 percent vehicle miles traveled (VMT) reduction target. As revised, the mitigation includes a performance goal of a 39 percent reduction in weekday home-based VMT per capita for market-rate residential uses.

Mitigation Measure 3.14-2a is enforceable through multiple mandatory actions. The project applicant shall develop, implement, fund, and submit a transportation demand management (TDM) program for County review and approval prior to issuance of building permits, and shall submit annual monitoring reports documenting program effectiveness. As described in the mitigation measure, County of Marin Public Works retains approval authority over the TDM program and ongoing oversight through required monitoring, satisfying State CEQA Guidelines Section 15126.4(a)(2) that mitigation measures be fully enforceable through permit conditions or other measures.

While the TDM program identifies a range of strategies that may be included, Mitigation Measure 3.14-2a requires preparation, implementation, and ongoing monitoring of a County-approved TDM program. The mitigation establishes a VMT reduction performance goal for market-rate residential uses and requires the applicant to implement the approved program and report on its performance, subject to County review and oversight.

The phrase "maximum feasible trip reduction" does not eliminate enforceability. As stated in Mitigation Measure 3.14-2a, feasibility is addressed through preparation and the County's review and approval of the TDM program and through annual monitoring of program performance. The measure appropriately allows County discretion to determine, in collaboration with the applicant, which combination of TDM strategies is feasible while still requiring implementation aimed at achieving the stated 39 percent VMT reduction goal.

Additionally, the comment asserts that mitigation or post-approval monitoring is required for campus VMT impacts that were determined to be less than significant. CEQA does not require mitigation for impacts that do not exceed a threshold of significance. As documented in Section 3.14, "Transportation," of the Draft EIR, campus VMT impacts were evaluated using a per service population threshold developed in consultation with County staff and informed by State CEQA Guidelines Section 15064.3, the Governor's Office of Land Use and Climate Innovation (previously named the Governor's Office of Planning and Research) Technical Advisory, and the most recent CARB Scoping Plan. As shown in Draft EIR Table 3.14-2, the Existing Plus Project campus VMT per service population would be 30 percent below the existing campus baseline and would therefore result in a less-than-significant impact. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-6**6. Loss of Sensitive Natural Communities Was Incorrectly Found Less Than Significant**

The EIR finds that permanent loss of 16.4 acres of needle grass-melic grass grassland—a state-ranked "Vulnerable" (S3) natural community at moderate risk of extirpation—is "Less Than Significant." The EIR's own Table 3.4-3 confirms the S3 ranking. The basis for this determination is that similar habitat exists in nearby preserves.

This reasoning does not satisfy CEQA. The incremental loss doctrine requires analysis of the project's specific contribution to the statewide decline of a vulnerable community, not merely whether some habitat remains elsewhere. An S3 ranking means the community is already at risk; the loss of 16 additional acres contributes to that risk regardless of what exists in Golden Gate National Recreation Area or Ring Mountain Preserve. The EIR proposes no compensatory mitigation—no restoration, no conservation easements, no off-site protection—for a 16-acre loss of a state-ranked vulnerable community.

Sources: Draft EIR pp. 203, 209, 218-219; Final EIR pp. 145-146; CEQA Guidelines §15065(a)(1)

Response F/O2-6

The comment states that impacts related to the loss of needle grass-melic grass grassland was incorrectly found to be less than significant and implies that mitigation should have been proposed because this vegetation type is ranked by the California Department of Fish and Wildlife (CDFW) as vulnerable (or S3 rarity ranking). As discussed on page 3.4-20 of the Draft EIR, CDFW maintains a list of plant communities that are native to California (CDFW 2021). Sensitive natural communities are ranked by CDFW from S1 to S3, where S1 is critically imperiled, S2 is imperiled, and S3 is vulnerable. However, mitigation is not required solely because a natural community is ranked S1 to S3. Generally, mitigation would be recommended if there was permanent loss of a high-quality or regionally rare vegetation type; loss that contributed to cumulative regional decline; reduced long-term viability or ecological function; inconsistency with adopted conservation plans or policies; or large-scale conversion of intact habitat, especially for S1 or S2 communities. On the other hand, mitigation generally would not be recommended if the affected vegetation type is locally common or well represented regionally; the impact area is small relative to available habitat; the vegetation type is degraded, disturbed, or edge-affected; and a project site does not support high-quality or unique occurrences.

As stated in the comment, Table 3.4-3 of the Draft EIR shows the CDFW-defined sensitive natural communities on the project site, their CDFW rarity ranking, and how many acres occur on the project site. Although needle grass-melic grass grassland is ranked as a vulnerable sensitive natural community, the Draft EIR states on page 3.4-20 that the needle grass-melic grass grassland on the project site is subject to regular mowing and other factors that have degraded the existing quality of this plant community. The Draft EIR further explains on page 3.4-14 that the portions of the project site that contain needle grass-melic grass grassland are fragmented, scattered between buildings and paved roads, regularly mowed, and surrounded by development, which diminished the quality of the existing habitat. Moreover, the impacts analysis in the Draft EIR under Impact 3.4-6 ("Potential Degradation or Loss of Sensitive Natural Communities Identified by CDFW or USFWS") details that regular disturbance, small patch size, and fragmentation of the on-site needle grass-melic grass grassland have occurred since the site was originally developed in the 1950s.

The existing disturbance and activity from the surrounding developed environment have reduced the quality of this existing sensitive natural community, as well as the habitat quality for native fauna. Additionally, page 3.4-30 of the Draft EIR describes the preserves within a few miles of the project, which contain areas where the characteristic signature of perennial grasslands (e.g., rough, clumpy texture) can be seen from Google Earth aerial imagery. This includes preserves such as Golden Gate National Recreation Area, Ring Mountain Preserve, Old Saint Hilary's Preserve, La Cresta Open Space, Atkinson Open Space, and Mt. Burdell Preserve, which have documented and protected the presence of perennial grasslands on their lands. Thus, the EIR concluded that loss of the highly disturbed small and fragmented patches of needle grass-melic grass grassland type would not represent a substantial adverse effect on this vegetation type in the region because of the degraded existing conditions of the

on-site sensitive natural community and the abundance of high-functioning examples of this community protected in preserves in the region surrounding the project site. For these reasons, the impact was found to be less than significant, and no mitigation was recommended. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-7

7. The Evacuation Analysis Uses Incorrect Methodology

The EIR concludes that Seminary Drive and East Strawberry Drive can accommodate 7,600 vehicles per hour during an evacuation. This figure derives from "saturation flow rates" designed for ideal signalized intersections with 12-foot lanes, no grades, and calm drivers proceeding methodically under normal conditions. Seminary Drive is a narrow residential street with stop signs, driveways, parked cars, and families fleeing a wildfire.

Standard traffic engineering practice requires applying reduction factors for lane width, stop-controlled intersections, unfamiliar drivers, and emergency conditions. The EIR does not apply these factors. The stated 7,600 vehicles per hour capacity is dramatically overstated and the actual evacuation capacity of these routes remains unknown.

Sources: Draft EIR pp. 429-431; Final EIR pp. 112, 343, 391-394; CEQA Guidelines §15151

Response F/O2-7

The comment states the evacuation analysis uses incorrect methodology and should have applied reduction factors for lane width, stop-controlled intersections, unfamiliar drivers, and emergency conditions. The comment claims that the 7,600 vehicles per hour capacity is dramatically overstated and the actual evacuation capacity of these routes remains unknown.

The purpose of the evacuation analysis is to determine whether the roadway system could reasonably accommodate evacuation demand associated with the project. The analysis conservatively assumes full residential occupancy, visitors, students, and employees present at the same time, resulting in an estimated highest-case evacuation demand of approximately 5,326 vehicles. This approach is conservative to avoid the risk of understating evacuation conditions and impacts.

In an evacuation scenario, normal stop controls and typical traffic operations would be reasonably expected to give way to a continuous outbound movement of vehicles, with both lanes used to move traffic off the peninsula. Under these conditions, roadway capacity is driven by overall outbound flow, and driver familiarity would not materially affect evacuation performance because drivers would follow the flow.

Even with these conservative assumptions, estimated evacuation demand remains below the outbound capacity of Seminary Drive and East Strawberry Drive. Additionally, according to Marin Wildfire Prevention Authority's (MWPA) evacuation difficulty maps, the roadways that would likely serve as primary evacuation routes for the project site have evacuation difficulty scores (roadway and aggregate) ranging from minimal to low (MWPA 2024), which indicates their suitability for carrying the local evacuation. Therefore, the project traffic would not preclude nor result in any substantial impediment to evacuation of the local community; evacuation impact would remain less than significant. See Impact 3.14-4 of the Draft EIR. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-8

8. Water Supply Assessment Requirements Were Not Evaluated

The EIR concludes that a formal Water Supply Assessment is not required because the project has 324 residential units, below the 500-unit threshold. The project also includes an academic campus and care facility, bringing total water demand to 129.8 acre-feet per year—roughly 42 million gallons annually. Water Code Section 10912(a)(7) includes a catch-all provision requiring assessment for any project demanding water equivalent to a 500-unit project. The EIR contains no calculation comparing the project's total demand to this equivalence threshold.

Sources: Draft EIR p. 448; California Water Code §10912(a)(7)

Response F/O2-8

The comment restates the total water demand for the project of 42 million gallons per year (mgy) and the conclusion from the Draft EIR that a specified water supply assessment, as required by SB 610, Statutes of 2001, is not required because the proposed number of dwelling units is below the 500-unit threshold in the California Water Code. The comment states that the Draft EIR does not contain a calculation comparing the project's total water demand to the catchall 500-unit equivalent threshold for preparing the specified assessment in California Water Code Section 10912(a)(7).

The Draft EIR and Final EIR contain considerable substantive analysis of water demand and water supply, including under drought conditions, that adequately evaluates and discloses potential water supply impacts of the proposed project. CEQA requires an evaluation of the project's physical changes to the existing environment and whether those changes constitute significant environmental impacts. The proposed project includes 324 residential units, consisting of 139 replacement units and 184 new units. As the comment notes, the total water demand of the project is approximately 42 mgy; however, the comment omits the fact that this total includes both the existing water demand associated with the 139 replacement units and the additional water demand from the 184 new units. Thus, as necessary under CEQA to determine the predicted physical change in water demand, the impact analysis in the Draft EIR was based on the net change in water demand comparing the existing setting with the proposed project's water demand. The net change in water demand would, therefore, correctly be approximately 19.2 mgy, not the incorrect statement of approximately 42 mgy of water as presented in the comment.

The projected water demand estimates for project's residential development were derived from California Emissions Estimator Model (CalEEMod) outputs. Indoor and outdoor water consumption model factors are calculated using the Pacific Institute *Waste Not Want Not* report from 2003. These values are divided in CalEEMod by the total number of occupied households in California and for the purposes of environmental analysis are reasonably representative of residential dwelling unit types in general (e.g., single family, apartment, condo) (CAPCOA 2021a). These consumption rates (in gallons per unit per year) are summarized in Table 9.1 of CalEEMod Appendix D. The resulting representative consumption rate is 106,229 gallons (or 0.106229 million gallons) per unit per year (65,154 gallons indoor, 41,075 gallons outdoor) (CAPCOA 2021b). These consumption rates are based on data from the 2003 *Waste Not Want Not* report and do not account for contemporary water efficiency measures that have been implemented over the past 20+ years, including updates to building codes. Thus, using a representative consumption rate in CalEEMod is inherently conservative, i.e., tending to be an excessive prediction of consumption but helpful to avoid the risk of understating environmental impact. For commercial land uses, the *Waste Not Want Not* report was similarly used, which is based on total gallons of water used per day per unit metric (i.e., employee, student, room, acre, or square foot). With respect to educational land uses, such as the proposed project, CalEEMod assumes that academic institutions operate 180 days per year, and thus calculates water usage based on this assumption (CAPCOA 2021a: 38–39). Absent other water projections available from local sources, CalEEMod's water demand factors are reasonable to use in Section 3.15, "Utilities and Service Systems," and constitute the best available data at the time the Draft EIR was prepared.

As a good faith effort to respond to the concerns raised in the comment, a comparison of the project's additional water demand to that of a 500-unit residential project is provided herein for informational purposes only. Applying the same methodology used to calculate the project's water demand (i.e., CalEEMod), a 500-unit residential development would have a water demand of approximately 53.1 mgy. Thus, the project's additional demand of 19.2 mgy is substantially below the 500-unit equivalent threshold specified in the California Water Code. To further demonstrate that the project is below this threshold, a similar exercise was completed using the water demand factors from Marin Water's Updated 2020 Urban Water Management Plan (UWMP) (Marin Water 2024). The water demand factors utilized in Marin Water's Updated 2020 UWMP were calculated based on the number of residential dwelling units per account provided in customer billing data from 2010 through 2019; thus, these demand factors represent on-the-ground data of water use in Marin Water's service area. The average water demand over the 10-year period for a single multifamily residential unit, which has a lower water demand compared to single-family

residential, is approximately 112 gallons per day (see Appendix C, Table 3-4b, of Marin Water's 2020 Updated UWMP). Using this water demand factor, a 500-unit residential development consisting entirely of multifamily units would have an annual water demand of approximately 20.5 mgy. Therefore, even under this more conservative scenario, the project's additional water demand would be below the 500-unit equivalent threshold in the California Water Code.

Moreover, as indicated in Final EIR Response O4-116, the analysis presented in the Draft EIR satisfies the content requirements of State CEQA Guidelines Section 15155 in that it evaluates the sufficiency of Marin Water's water supplies in both normal and drought conditions to determine the project's water supply impacts. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-9

9. Downstream Infrastructure Impacts Were Not Analyzed

Neighbors raised concerns about a collapsed downstream stormwater pipe. The County's response focused on private property ownership and the absence of any duty to repair private infrastructure. CEQA's concern is with indirect physical impacts—specifically, whether increased stormwater flow could exacerbate existing infrastructure failures. The ownership of the pipe does not determine whether the project's runoff affects it. The EIR analyzes whether runoff will overflow during storms, but not whether sustained flow will further damage an already-failing pipe.

Sources: Draft EIR pp. 321-322; Final EIR pp. 366-367; CEQA Guidelines §15126.2

Response F/O2-9

The comment claims that the EIR analyzed whether runoff would overflow during storms, but not whether increased stormwater flow would exacerbate existing infrastructure failures including further damage to an already-failing, collapsed downstream stormwater pipe. The comment does not raise new information or identify an impact that was not already evaluated in the Draft EIR and Final EIR. As explained in Final EIR Section 3.2.6, "Master Response: Evaluation of Existing Storm Drain System," the EIR analyzed existing hydrology and drainage conditions and evaluated whether the proposed project could cause or exacerbate stormwater-related impacts, including effects on off-site drainage systems.

The Draft EIR relied on the Hydrology and Hydraulic Study (Draft EIR Appendix N), which evaluated stormwater runoff rates, drainage capacity, and downstream flow conditions. That analysis concluded that the project would incorporate on-site stormwater detention and drainage improvements designed to prevent increases in peak runoff rates leaving the site, thus resulting in project peak flows that would be less than existing conditions. Because the project would not increase the rate or volume of stormwater discharged to off-site infrastructure, it would not exacerbate capacity limitations, erosion, or flooding in downstream systems. CEQA requires evaluation of a project's incremental contribution to environmental impacts. It does not require a lead agency to analyze or remediate preexisting off-site infrastructure deficiencies absent evidence that the project would worsen those conditions. Because the project would reduce peak flows compared to existing conditions, it would not contribute to or intensify existing downstream drainage failures. In addition, the project would replace or upgrade most on-site storm drain infrastructure to meet current County standards, and any remaining on-site facilities would receive reduced flows. Additionally, compliance with County hydrologic and hydraulic design standards, the County's municipal separate storm sewer system permit, and applicable Bay Area Stormwater Management Agencies Association requirements would be verified during final design and permitting. The project would therefore not result in adverse off-site stormwater impacts compared to existing conditions. According to these findings, the Draft EIR correctly concluded that stormwater impacts would be less than significant, and no revisions to the EIR are required in response to this comment.

Comment F/O2-10

10. Assumptions regarding on-campus living, traffic and other activities are unrealistic. Mitigation Measure 3.14-2b would require a permanent dedication of a portion of the project's market rate residential units, within the limits

of feasibility (*italics added*), to campus-affiliated residents (i.e., students, staff, and/or faculty) as a condition of approval. This measure is the most likely to be effective at reducing VMT for the project. Not only does this sentence use the qualifier “limits of feasibility”...but it also relies on successfully prioritizing on campus residential living to ensure that significant amounts traffic and other activities remain within the perimeter of the development. All of this is highly speculative and unlikely. The best way to mitigate this issue would presumably be to strictly limit the student and staff count...or replace the school with additional housing. This is a classic example of illegal, unenforceable, deferred mitigation.

Response F/O2-10

The project’s VMT impact from residential uses was found to be significant and unavoidable (Draft EIR Impact 3.14-2). Mitigation Measure 3.14-2b is included to reduce impacts to the extent feasible, but it is not expected to reduce VMT to a less-than-significant level as detailed in Section 3.14 of the Draft EIR. CEQA does not require mitigation to fully eliminate a significant impact; it only requires measures to reduce significant effects of a project to the greatest extent feasible (State CEQA Guidelines Section 15126.4[a][1]).

The requirement to dedicate a portion of market-rate residential units to campus-affiliated residents is enforceable, and the phrase “within the limits of feasibility” appropriately allows flexibility while maintaining a binding obligation. The suggested alternatives to limit student enrollment or replace the campus with additional housing would not meet the project’s objectives, and the County does not have authority to restrict student enrollment beyond what is allowed under the current CUP. Therefore the suggested alternatives are not appropriate mitigation under CEQA. Also see Final EIR Section 3.2.13, “Master Response: VMT Mitigation Measures.” No revisions to the EIR are warranted in response to this comment.

Comment F/O2-11

11. **Hydrology.** The FEIR erroneously indicates the public comments related to hydrology did not identify any significant environmental impacts. The FEIR’s does not legally address “whether the 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.”

- a. The FEIR wrongly indicates this was covered in section 3.9.6 of the draft EIR. It failed consider the impact on human health. The EIR admits there will be a significant traffic increase that will not be mitigated. With additional traffic caused by the project and more frequent flooding and closure of the primary evacuation route from Strawberry, traffic will clog all remaining access routes. This will significantly increase fire, other emergency and ambulance response times. This presents a significant adverse impact on human health, is a direct cause of the project, and should have been addressed in the EIR. The County’s assertion that this was addressed by section 3.9.6 of the draft EIR is simply wrong. The draft EIR’s summary conclusion in that section shows that it ignores the impact on human health: “Although the project does not exacerbate the hazard, increases in traffic exposure to the existing hazard would occur with construction of the project. The project would not exacerbate any existing and or projected damage to the environment associated with future sea level rise and peak high tides. Therefore, the impact would be less than significant.”

Response F/O2-11

The comment incorrectly asserts that the Final EIR failed to address impacts on human health related to reasonably foreseeable future sea level rise and peak high tides. The Draft EIR analyzed sea level rise and peak high tide conditions under “Impact 3.9-6: 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,” including the location of the project relative to projected inundation areas, anticipated future conditions, and whether the project would exacerbate flood hazards or associated environmental damage. As shown in Draft EIR Figure 3.9-3, “Sea Level Rise Scenarios Near the Project Site,” and discussed in Impact 3.9-6, portions of regional roadways may experience periodic flooding under future sea level rise scenarios; however, the

project site itself is largely located outside projected inundation zones, and the project would not alter coastal processes, tidal exchange, or drainage patterns in a manner that would exacerbate flooding conditions.

With respect to whether increased congestion would impair emergency access or response times, the Draft EIR evaluated traffic conditions, emergency access, and evacuation routes in Section 3.14, "Transportation," including analysis of Seminary Drive, US Highway 101 ramps, and regional circulation under existing and projected conditions. The EIR disclosed that the project would result in a significant and unavoidable transportation impact related to VMT, and this impact is addressed in the Statement of Overriding Considerations. The analysis also found that although traffic would increase, the project would not block evacuation routes, remove emergency access, or substantially impair emergency response because roadway connections would remain in place and the project must comply with County emergency access standards. Draft EIR Impact 3.9-6 evaluated future sea level rise and flooding and concluded that although regional roadways may experience periodic flooding independent of the project, the project would not exacerbate flooding conditions or increase road closures. CEQA requires evaluation of whether a project would exacerbate hazards (i.e., increase sea level rise in this circumstance), not whether changes to the number of people exposed to existing or predicted climate change hazards would occur when the project does not worsen the underlying hazard. Because the project would not increase sea level rise to exacerbate flooding, eliminate evacuation routes, or substantially impair emergency response, the EIR appropriately concluded that impacts to human health related to sea level rise and traffic would be less than significant. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-12

12. **Staffing.** The staffing model used for school lacks factual basis and does not assess true impact by grossly undercounting **staff** members.

b. The EIR postulates a faculty/staff population of only 253 individuals. That is a 25% employee-to-student ratio, which is way below industry standards. Virtually all other tertiary schools in the Bay Area have (nonstudent) employee-to-student ratios of between 40 – 112%.*

- ▶ *St Mary's College Moraga 62%
- ▶ *Stanford University 112%
- ▶ *University of California 89%
- ▶ *University of San Francisco 40%
- ▶ *Dominican University 50-95% (per CA Form 990)
- ▶ *California College of Law 40%
- ▶ *University of Santa Clara 64%

Response F/O2-12

The comment states the staffing model used for the school lacks factual basis and undercounts staff members referencing other tertiary schools in the Bay Area. See Response F/I1-1 in this memo below.

Comment F/O2-13

13. **Commute Impacts.** The commute impacts of construction workers lacks credible analysis in the FEIR. Anyone living in Marin can attest that, overwhelmingly, construction workers likely to be involved in this project will come from outside Marin. Sonoma, Napa, Alameda, Contra Costa and Solano are where these workers will be drawn from. Few will be from Marin. The "average" Marin commute may be 10.3 miles as stated in the EIR, but that is frankly irrelevant to those likely to work on this project. Further, to complete this project in only four years with 10-160 workers significantly underestimates the time frame. Where did the Developer arrive at a four-year estimate? Why has the County accepted it?

- a. Commuting Students Are Functionally Excluded From Public Services Analysis. The EIR repeatedly asserts that:
- b. Most commuting students' demand for public services is "affiliated with where they live" and that their on-site presence is "transitory." Therefore, they do not warrant analysis beyond traffic impacts.
- c. This reasoning is illegally used to exclude up to ~900 commuting students from fire, police, EMS, parks, and emergency response demand calculations.
- d. CEQA evaluates service demand where impacts occur, not where people sleep. Emergency calls, policing needs, medical incidents, and evacuations occur where people are physically present, even if temporarily. The EIR acknowledges 1,000-student enrollment elsewhere, yet omits them from public services modeling except traffic. **Courts have rejected "transitory use" arguments when a use meaningfully increases on-site population during peak hours.**

Response F/O2-13

The comment states the commute impacts of construction workers lacks credible analysis, questions the 4-year anticipated construction schedule, and asserts the analysis of commuting students and impacts on public services used an inadequate or "illegal" approach. See Response F/11-2 in this memo regarding the 10.3-mile average worker commute distance estimate used in the EIR. See Final EIR Response O4-6, which addresses the commenter's prior comment on the construction schedule.

As explained in Draft EIR Section 3.13, "Public Services and Recreation," the EIR evaluates whether the project would cause new or substantially increased demand for public services that would result in the need for new or expanded facilities, the construction of which could cause significant environmental impacts, consistent with State CEQA Guidelines Appendix G. The public services analysis focuses on whether additional project demand would be sufficient to require construction of new facilities or expansion of existing facilities to maintain service levels, rather than on a numerical count of all people who may be temporarily present at the project site at any given time.

The EIR does not exclude commuting students from consideration. The analysis appropriately distinguishes between permanent population and employees, which drive baseline demand for public services, and daytime users, whose presence is already contemplated within their respective existing service capacity and in operational planning evaluated by service providers. CEQA does not require agencies to assume that every person physically present creates the same service demand as a resident.

The EIR acknowledges enrollment of up to 1,000 students, including commuting students, as part of the project description and population assumptions evaluated throughout the EIR. As explained in Final EIR Responses O4-59, O4-73, O4-84, and O4-90, the presence of commuting students was considered in determining whether the project would increase demand for public services such that new or expanded facilities would be required. The EIR relies on direct consultation and evidence in the record and determined that the project could be served by existing public service providers and would not require construction of new or expanded public service facilities. Emergency access and response considerations are also addressed elsewhere in the EIR, including Section 3.14, "Transportation," where circulation, emergency vehicle access, and operational conditions are evaluated. Also see Response F/O2-14 in this memo below. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-14

14. **Emergency Services.** Fire and Emergency Services: No Quantified Response Time Analysis. Despite repeated requests, the EIR does not provide:

- ▶ Baseline fire/EMS response times
- ▶ Projected future response times
- ▶ Mitigated response times
- ▶ Comparison to SMFD response standards

Instead, it relies on qualitative consultation and infrastructure fixes (signal preemption / roundabout). CEQA requires substantial evidence, not assurances. Multiple commenters (including fire professionals) explicitly requested quantified response modeling. The mitigation is illegally adopted without demonstrating effectiveness. The EIR admits additional EMS staffing may be required, but dismisses it as non-significant because no new station is planned. This is illegal.

Emergency personnel staffing impacts are improperly excluded from numerous significance determinations. Ongoing staffing shortages can degrade service levels (response times, coverage, etc.). The EIR does not analyze whether staffing increases are feasible, funded, or timely. This is a frequent CEQA litigation vulnerability, especially when agencies acknowledge service strain but decline mitigation.

Response F/O2-14

The comment asserts that the EIR is inadequate because it does not include quantified fire and emergency response time modeling and because it does not analyze staffing levels or funding for emergency services. As explained in Draft EIR Section 3.13, "Public Services and Recreation," the EIR evaluates whether the project would result in new or substantially increased demand for public services sufficient to require the need for new or expanded facilities, the construction of which could cause significant environmental impacts, consistent with State CEQA Guidelines Appendix G. The significance determination in Draft EIR Section 3.13 is based on whether the project would require construction of new facilities or expansion of existing facilities to maintain service levels, which would result in adverse physical impacts on the environment.

As presented in Draft EIR Section 3.13, "Public Services and Recreation," and explained in Final EIR Responses O4-59, O4-73, O4-84, and O4-90, the EIR determined that the project could be served by existing fire, police, and emergency service providers and that no new or expanded public service facilities would be necessary as a result of implementation of the project. The EIR evaluates the maximum potential population increase associated with the project and whether the increase in population would create conflicts with the existing standards and requirements of local public services. In some cases, the analysis involved direct contact with the relevant service providers. One potentially significant impact related to fire protection services (Impact 3.13-1: Result in Increased Demand for Fire Protection Facilities and Services) was identified in the Draft EIR and was reduced to less than significant through implementation of mitigation. No other significant impacts were identified related to public services. See Final EIR Response O4-83 regarding impacts on fire protection services and coordination with Southern Marin Fire Protection District (SMFD) on Mitigation Measure 3.14-4.

Preparation of the analysis included providing project plans to SMFD to allow review of project design and identification of potential concerns. According to this coordination, Mitigation Measure 3.14-4 ("Construct a Roundabout at the Intersection of Seminary Drive/Ricardo Road/Vista Del Sol") was developed and later refined, as described in Final EIR Section 3.2.12, "Master Response: Emergency Vehicle Access Mitigation Measure." Following review of the revised mitigation, SMFD did not identify additional concerns regarding emergency access. As described in the EIR, SMFD would also review final design plans during the permit and design review process prior to issuance of building permits.

With respect to police services, Draft EIR Section 3.13 evaluates Impact 3.13-2, which addresses the effect of increased on-site population on police protection services. As documented in the Draft EIR, the Marin County Sheriff's Office was consulted during preparation of the EIR and indicated that existing staffing levels would be sufficient to serve the project and that no reduction in service to the unincorporated County would be expected. The analysis further states that no additional police facilities or equipment would be required (Schneider, pers. comm., 2022; Schermerhorn, pers. comm., 2023). As described in Draft EIR Section 3.13, the project would also be subject to review and approval by the Sheriff's Office based on uniformly applied standards and regulations. Should the project be approved, as part of the standard permit and design review process, the Sheriff's Office would determine its ability to provide services and would make project-specific recommendations to maintain an acceptable level of service.

Thus, the EIR evaluates the effects of increased on-site population on demand for fire, police, and emergency services; relies on consultation with the affected service providers; and determines that the project's change in service demands would not require new or expanded public service facilities. The analyses in the Draft EIR and Final EIR regarding public services are supported by substantial evidence in the record and are adequate under CEQA. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-15

15. No Mention of Blind, Confined, Narrow Curves in the Lower Divided Section of East Strawberry Drive.

- a. Appendix D – Memorandum has a section titled "Observations of Existing Intersection Issues and Potential Measures." Item 7 "300 block of E. Strawberry Drive" (on page 16) it omits any mention of the two blind curves from #325 - #235 as one travels north on E. Strawberry Drive. These blind curves were raised in public comments written in response to the DEIR by Terrill Graham. Moving cars and bicycles are unaware of pedestrians or cars entering or exiting garages or driveways until they are on top of them. Many of these houses were originally built in the 1950s when the lower section was designed for approach to garages and driveways from the north. It takes longer to enter and exit these for approach from the south. The roadway here is very narrow and trapped by the bank to the west and the parked cars and houses to the east.
- b. Item 7 (on page 16) mentions that there have been no reported fatal or injury collisions in this area from 2019 – 2024. However, we have observed during the aftermath of several incidents: smashed fences, broken mailboxes, and cars stranded on the center divide.

Response F/O2-15

The comment raises general concerns regarding reported collision history on the Strawberry Peninsula and the existing roadway configuration along the 300 block of East Strawberry Drive. The Transportation Impact Study (TIS), included as Appendix C of the Final EIR, evaluated traffic safety conditions within the project study area, as summarized in Final EIR Section 3.2.11, "Master Response: Transportation Safety."

The TIS reviewed collision data for a 5-year period between 2015 and 2019 and found that no study intersections exhibited high collision rates. According to the traffic operations analysis, the TIS concluded that project-generated traffic would not result in substantial changes to congestion at any study intersection and, therefore, would not substantially alter existing traffic safety conditions. Accordingly, the Draft EIR did not identify any significant traffic safety impacts associated with the project (see Draft EIR Impact 3.14-3).

Notwithstanding that substantial evidence supports a conclusion of no significant traffic safety impacts from project trips, County staff desired to respond thoroughly to community concerns about traffic safety and requested a review of existing intersection conditions (Final EIR Appendix D). This memo provides an updated review of collision data from the Transportation Injury Mapping System (TIMS), a statewide database maintained by the State of California using law enforcement-reported traffic injury collision records for the 5-year period from September 2019 through September 2024.

The updated review found no fatalities within the study area during the study period. Two reported collisions involved pedestrians, and four involved bicyclists, one of which did not involve a vehicle. A map of reported collisions is provided in Figure 2 of the Existing Intersections Review Memorandum (Final EIR Appendix D).

With respect to the 300 block of East Strawberry Drive, no reported collisions occurred along the segment adjacent to residences approximately numbered 325 through 235. One collision involving a suspected minor injury occurred at the East Strawberry Drive/Harbor Cove Way intersection and involved a hit-and-run vehicle making a southbound left turn and a pedestrian traveling westbound.

The Existing Intersections Review Memorandum was prepared by transportation planning and engineering firm Fehr & Peers and included field observations conducted by a licensed traffic engineer. The memorandum identified potential measures to address existing roadway conditions as appropriate; however, these measures are not related

to impacts exacerbated by the project. As demonstrated in the Level of Service (LOS) Assessment Memo (Final EIR Appendix B), the intersection of East Strawberry Drive and Herring Street, the intersection closest to the 300 block of East Strawberry Drive, would continue to operate at LOS A under all analyzed scenarios.

Because project traffic would not substantially change existing traffic volumes or transportation hazards, these improvement options do not constitute CEQA mitigation measures, and the findings and voluntary recommendations presented in the Existing Intersections Review Memorandum do not alter the conclusions or adequacy of the transportation analysis in the Draft EIR. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-16

16. No Mention of Limited Access to Herring Drive/East Strawberry Drive Entrance.

In the past, access to and from the Seminary from Herring Drive was limited to certain hours or certain days

- a. Appendix C – Updated TIS Documents assesses “Vehicle Miles Traveled.” As stated on page 39: “IMPACT TRAN-1: Implementation of the proposed project would generate an increase in vehicle miles that may have a significant impact on the environment. And on page 40: “The existing plus Project Average Home-Based VMT per capita is estimated to be 19.1, which is 39 percent higher than the regional VMT threshold of 13.7.” More traffic will mean more accidents.
- b. In Appendix B – Updated LOS Assessment Memo Figure 2, Project Trip Distribution, indicates that 13% of the current traffic enters/exits the Seminary via Herring Drive. This statistic, although interesting, is meaningless. If total traffic volume goes up, so will the traffic on East Strawberry Drive. For example, page 9 in Appendix B contains Table 3: Project Trip Generation. It lists the current “Academic Campus” having 100 students and generating 156 daily trips. At 13% use of Herring Drive, that is 20.2 daily trips. The proposed “Academic Campus” would have 1000 students generating 1560 daily trips. At 13% use of Herring Drive, that is 202 per day, a tremendous increase (especially for a school that is currently undefined.)

Response F/O2-16

The comment states that in the past, access to and from the Seminary from Herring Drive was limited to certain hours or certain days and argues that the EIR analysis is inadequate because it does not recognize the consequences of increased traffic using that route.

VMT is used to evaluate transportation impacts under CEQA pursuant to Senate Bill (SB) 743 and is not relied upon as a proxy for transportation safety. The TIS, included as Appendix C of the Final EIR, evaluated traffic safety conditions within the project study area, as summarized in Final EIR Section 3.2.11, “Master Response: Transportation Safety.” It was determined in the Draft EIR that the project would not result in a substantial increase in transportation safety hazards (Impact 3.14-3). Notwithstanding that substantial evidence supports a conclusion of no significant traffic safety impacts from project trips, County staff desired to respond thoroughly to community concerns about traffic safety and requested a review of existing intersection conditions (Final EIR Appendix D). See Final EIR Section 3.2.11, “Master Response: Transportation Safety.”

The comment also misinterprets the purpose of Figure 2 (“Project Trip Distribution”) and Table 3 (“Project Trip Generation”) in Final EIR Appendix B and applies a simplified arithmetic approach that is inconsistent with accepted traffic analysis methodology. Figure 2 is intended to illustrate the relative distribution of project-generated trips across the roadway network, not to predict raw increases on individual streets in isolation. Project impacts are evaluated using net new external vehicle trips, which account for existing site traffic, internal trip capture between on-site uses, and reductions from walking, bicycling, and transit associated with the project’s mixed-use design.

The comment’s example incorrectly assumes that enrollment growth translates directly to proportional increases in traffic on individual streets, whereas the analysis evaluates net new external trips after accounting for existing traffic, internal capture, and travel mode reductions.

The LOS Memo, provided in Appendix B of the Final EIR, directly analyzes conditions at the East Strawberry Drive/Herring Drive intersection, which is the focus of the comment. As shown in Table 4 of the LOS Memo, this intersection would continue to operate at LOS A during both the a.m. and p.m. peak hours under Existing + Project, Cumulative, and Cumulative + Project conditions, with minimal changes in delay that remain well below County LOS thresholds. Although traffic volumes may increase modestly, operational performance would not be significantly affected.

The academic campus program is not "undefined." As described in Draft EIR Chapter 2, "Project Description," the analysis assumes a conservative maximum enrollment of 1,000 students, consistent with the existing 1953 Conditional Use Permit for the site. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-17

17. **Cumulative Impacts.** The cumulative impacts of other approved housing projects have not been properly analyzed. (Although there are additional projects that have been added as revisions to the Final EIR, other projects are missing.)

Response F/O2-17

The comment makes a general claim that the cumulative impacts of other approved housing projects have not been properly analyzed and asserts that other projects are missing. However, the comment does not identify which additional projects were not accounted for in the Draft EIR's or Final EIR's cumulative analyses, nor does the comment identify any specific deficiencies in the cumulative analysis to substantiate the assertion that impacts were not properly analyzed. Therefore, without reference in the comment to specific evidence, no further substantive response is possible.

As acknowledged in the comment, the list of related projects was updated in the Final EIR. Additional cumulative projects were considered in the Final EIR in response to comments received during the Draft EIR public review period. These additional projects were included in an updated version of Table 4-2, as documented in Chapter 4, "Revisions to the Draft EIR," of the Final EIR, and the cumulative impact analysis was reevaluated in consideration of the additional cumulative projects for each resource topic, as applicable, to determine whether any changes to the cumulative impact analysis or conclusions in the Draft EIR were required. It was concluded, based on this review of updated information, that these additional projects would not alter the cumulative impact significance determinations in Chapter 4, "Cumulative Impacts," of the Draft EIR. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-18

18. **Construction Noise.** Deferred Mitigation for Construction Noise Impacts – The FEIR admits that construction noise will exceed County thresholds, yet the proposed mitigations are insufficient for the Seminary area's topography:

- a. Line-of-Sight Failures: Standard 8-foot sound barriers are ineffective for hillside neighbors. Noise from heavy machinery on the project site will travel unimpeded to the second stories and elevated decks of homes on E. Bel Air Ave and the surrounding ridges.
- b. Deferred Mitigation: The EIR defers the specifics of the "Noise Control Plan" to a future date. Under CEQA, the public has a right to see the specific, enforceable performance standards of these noise mitigations before the project is approved.
- c. Saturday construction must not be allowed.

Response F/O2-18

The comment asserts the EIR deferred mitigation related to construction noise impacts and the proposed mitigation measures are insufficient because of the topography of the project site.

As included in State CEQA Guidelines Section 15126.4(1)(B):

Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

Pursuant to State CEQA Guidelines, Marin County will commit to implementation of the mitigation measures contained in the EIR through adoption of the plan and certification of the EIR. State CEQA Guidelines Section 15126.4(a)(1)(B) permits development of specific details of mitigation measures after project approval when it is infeasible or impractical to include those details during the project's environmental review as long as specific requirements are met. As required by Mitigation Measure 3.11-1, specific details for noise control would be developed as part of the construction noise control plan for the project when finalized project-specific information (e.g., specific equipment profiles, location of construction activities, precise construction durations) is available. Mitigation Measure 3.11-1 includes performance standards that the County must meet and potential actions that can feasibly achieve the performance standards, consistent with State CEQA Guidelines Section 15126.4(a)(1)(B). Specifically, the construction noise control plan required by Mitigation Measure 3.11-1 includes the performance standard that the County must use to demonstrate that construction noise would not exceed existing daytime noise levels at nearby residences by more than 5 A-weighted decibels (dBA), if feasible. If it is determined infeasible to reduce construction noise to more than 5 dBA above existing daytime noise levels at nearby residences, based on the distance to sensitive receptors and construction site topography, the construction noise control plan shall provide substantial evidence of infeasibility and inclusion of all feasible measures to reduce construction noise. Mitigation Measure 3.11-1 then provides specific actions that could be implemented to feasibly achieve the 5 dBA requirement. Therefore, Mitigation Measure 3.11-1 is consistent with State CEQA Guidelines 15126.4(1)(B) and does not constitute deferred mitigation.

As required by Mitigation Measure 3.11-1, construction noise shall not exceed existing daytime noise levels at nearby residences by more than 5 dBA, including hillside residences, such as those on East Bel Air Avenue. As part of the construction noise control plan for the project, impacts at nearby residences would be analyzed with finalized project-specific information. If it is determined that an acoustical wall is necessary to reduce noise levels for residences along East Bel Air Avenue, the type and height of the wall or other types of construction noise mitigation measures would be determined at the time of the noise control plan.

In accordance with the construction hour limits established by the Marin County Development Code Section 6.70.030, construction activities can occur between the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturdays. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-19

19. **Evacuation.** The impacts on emergency evacuation were not adequately analyzed. The number of senior residents, and the number of students and school staff were not properly included in the analysis. Inadequacy of Mitigation for Emergency Egress (Safety). The FEIR relies on VMT (Vehicle Miles Traveled) reduction to address transportation, which is an inadequate proxy for life-safety during a wildfire evacuation.

- a. **Physical Bottlenecks:** The mitigation measures do not address the physical reality that residents from Ricardo Lane, E. Bel Air Ave, and Great Circle Drive must all converge onto a single, narrow segment of Seminary Drive to reach Tiburon Blvd.
- b. **The Senior Care Constraint:** The inclusion of a 150-unit senior care facility requires specialized medical evacuation. The FEIR fails to provide a dedicated emergency route, meaning ambulances will be forced to compete with hundreds of residents fleeing on the same two-lane roads.
- c. **Underestimated Load:** By failing to model the evacuation of the 1,000- student population allowed under the 1953 CUP, the EIR underestimates the "worst-case" clearing time for the peninsula.

Response F/O2-19

The comment asserts that emergency evacuation impacts were not adequately analyzed. Impact 3.14-4 of the Draft EIR includes a worst-case scenario evacuation analysis that accounts for existing and proposed residents, up to 1,000 students, campus employees, daycare and fitness center staff, and residents and employees of the proposed senior care facility.

The evacuation analysis assumes full buildout conditions and evaluates roadway capacity on Seminary Drive and East Strawberry Drive using standard saturation flow assumptions, with both lanes available for outbound evacuation. Under these conservative assumptions, the available evacuation capacity exceeds the estimated number of vehicles requiring evacuation.

Impact 3.14-4 of the Draft EIR also addresses the specialized evacuation needs of senior residents. California Health and Safety Code, Chapter 9.5, requires that each senior center develop and maintain a written emergency operations plan that includes evacuation procedures and provisions for individuals requiring assistance. Consistent with this requirement, the analysis assumes assisted evacuation for the senior care facility, resulting in reduced vehicle demand relative to standard residential uses.

The comment also mischaracterizes the role of VMT in the Draft EIR. VMT is used to evaluate transportation impacts under CEQA pursuant to SB 743 and is not relied upon as a proxy for emergency evacuation. Also see Response F/O2-7 in this memo above and Responses O4-3 and I25-4, in the Final EIR. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-20

20. **Erroneous Energy Data:** Table 3.5-1 reports operational gasoline consumption of 183+ million gallons—approximately 1.8 times Marin County's entire annual fuel consumption. Caltrans flagged this error during the comment period. It was not corrected. (Draft EIR p. 233; CEQA Guidelines §15151)

Response F/O2-20

The comment identifies an error in the reporting of the findings of Appendix C of the Draft EIR. Appendix C includes statewide estimates of gasoline and diesel fuel consumption, applying the anticipated VMT generated from the project. The estimates of gasoline fuel consumption were overestimated in the Draft EIR, as identified in the comment. Applying an adjustment that accounts for Marin County's overall gasoline consumption (0.65 percent of the state), Table 3.5-1 on page 3.5-10 of the Draft EIR has been revised as follows (CEC 2025):

ORIGINAL:

Table 3.5-1 Operation-Related Building Energy Consumption

Energy Sector	Energy Consumption	Units
Mobile (Gasoline)	183,688,709	Gallons
Mobile (Diesel)	6,028,422	Gallons
Area	1,678,638	KWh
Energy	3,927,703	kBTU

Note: kWh = kilowatt hours, kBtu/year = British thermal units per year.

Source: Calculations prepared by Ascent Environmental in 2022 (Appendix C).

REVISED:

Table 3.5-1 Operation-Related Building Energy Consumption

Energy Sector	Energy Consumption	Units
Mobile (Gasoline)	183,688,709 1,193,976	Gallons
Mobile (Diesel)	6,028,422	Gallons
<u>Area Electricity</u>	1,678,638	KWh
<u>Energy Natural Gas</u>	3,927,703	kBTU

Note: kWh = kilowatt hours, kBtu/year = British thermal units per year.

Source: Calculations prepared by Ascent Environmental in 2022 (Appendix C).

The Draft EIR discloses estimated fuel consumption, both gasoline and diesel, and electrical and natural gas demand for informational purposes; however, the significance conclusion of the Draft EIR does not rely on the numerical estimates of gasoline consumption from implementation of the project. Rather, the Draft EIR uses a qualitative method to determine that the project would have a less-than-significant impact, because it exceeds the mandatory requirements of the CalGreen Code by incorporating on-site solar for new residential development, bicycle infrastructure, and the requirements of Section 19.04.135 of the Marin County Code as it pertains to EV charging. Therefore, this revision does not affect the findings of the EIR, because a numerical threshold was not the basis for the significance determination.

Comment F/O2-21

21. **Construction Vibration:** The EIR adopts 80 VdB as its significance threshold, calculates impacts of 101 VdB—21 logarithmic units above threshold—then concludes "Less Than Significant" based on daytime construction hours. An EIR cannot establish a threshold, exceed it by 26%, and then dismiss it. Also the physical impact exists regardless of time of day. (Draft EIR pp. 359, 364-365; CEQA Guidelines §15064(d), §15064(e))

Response F/O2-21

The comment states the EIR cannot establish a threshold for construction vibration, recognize an exceedance of the threshold, and then dismiss the impact. The comment states that physical impacts exist regardless of the time of day.

As described on page 3.11-17 of the Draft EIR, the 80-vibration-decibel (VdB) significance threshold is a threshold for human disturbance because it exceeds the 75 VdB vibration velocity where people begin to perceive vibration. The 80 VdB significance threshold is thus applied only to hours of the day that humans would experience disturbance from vibration (i.e., during sleep). Project construction would occur between the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturdays, which are not considered times of day when people are more sensitive to disturbance. Vibration may be perceptible because it would occur during the daytime hours when existing ambient noise levels are higher. However, as described in Impact 3.11-2 of the Draft EIR, higher

ambient noise levels can mask vibration noise, thereby reducing the potential to result in intolerable levels of vibration impacts and resulting in a less than significant impact from vibration. Therefore, Impact 3.11-2 of the Draft EIR includes an analysis of the physical impacts that may occur from vibration regardless of the time of day (State CEQA Guidelines Section 15064[d]). The comment references State CEQA Guidelines Section 15064(e), which states that economic and social changes resulting from the project shall not be treated as significant effects on the environment. State CEQA Guidelines Section 15064(e) does not relate to vibration impacts, which do not have an economic or social impact. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-22

22. **Reduced Development Alternative:** A 234-unit alternative (90 fewer units) was rejected as "legally infeasible" due to SB 330. SB 330 limits the County's authority to mandate reductions—it does not preclude CEQA disclosure of alternatives the applicant could voluntarily adopt. The project has Significant and Unavoidable VMT impacts; this alternative was excluded from analysis without valid basis. (Draft EIR p. 508; Final EIR pp. 32-39; CEQA Guidelines §15126.6(c), §15364)

Response F/O2-22

The comment states that the Reduced Development Alternative (Seminary Tomorrow Process Outcome) was excluded from further analysis without valid basis. This is not a new comment and does not bring up a new issue not previously addressed in the Final EIR or new evidence to consider in the analysis. The master response starting on Final EIR page 3-7 in Section 3.2.2, "Master Response: Adequacy of the Range of Alternatives," outlines the process for selecting the alternatives for evaluation in the Draft EIR. Additionally, the master response starting on Final EIR page 3-12 in Section 3.2.3, "Master Response: Reduced Development Alternative (Seminary Tomorrow Process Outcome)," discusses why this option was deemed legally infeasible. Moreover, for informational purposes, the Final EIR provided a more detailed comparison of the Seminary Tomorrow Process Outcome as a Reduced Development Alternative. Thus, this comment does not bring up a new issue not previously addressed in the Final EIR, and as a good faith response to requests for additional environmental information about the Reduced Development Alternative, notwithstanding its legal infeasibility, the Final EIR included Table 3-2, which summarized the relative environmental impacts compared to the proposed project. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-23

23. **Speculative No Project Baseline:** The No Project alternative assumes enrollment could increase from 100 to 1,000 students based on a 1953 permit, while the applicant's own materials indicate the campus requires renovation to remain viable. This inflates the baseline and obscures the proposed project's incremental impacts. (Draft EIR p. 510; CEQA Guidelines §15126.6(e)(2))

Response F/O2-23

The comment asserts the No Project Alternative improperly inflates the baseline by assuming enrollment could increase from 100 to 1,000 students based on the 1953 CUP when materials indicate the campus requires renovation to remain viable and this masks the proposed project's incremental impacts.

As explained in Draft EIR Chapter 5, "Alternatives," in the discussion of the No Project Alternative on page 5-8, the No Project Alternative is intended to describe reasonably foreseeable conditions in the absence of the proposed project, including continuation or reactivation of uses allowed under existing entitlements. Consistent with State CEQA Guidelines Section 15126.6(e)(2), the EIR identifies that, without the proposed project, the property could continue to operate as an educational campus consistent with the existing 1953 CUP, which authorizes enrollment of up to approximately 1,000 students. The No Project Alternative therefore reflects the maximum permitted intensity that could reasonably occur absent the proposed project. Additionally, with respect to the comment that the campus would require renovation to remain viable, the EIR acknowledges that maintenance, repair, and renovation activities could occur under existing entitlements in the absence of the proposed project, and that such activities would be subject to CEQA review if they involved discretionary approvals or resulted in new or more severe environmental impacts.

The environmental baseline for evaluating project impacts is established in Draft EIR Chapter 2, "Project Description," and Chapter 3, "Environmental Impacts and Mitigation Measures," based on existing physical conditions at the time of publication of the notice of preparation (NOP), consistent with State CEQA Guidelines Section 15125(a). As documented throughout Chapter 3 of the EIR, the baseline reflects the campus's current operational condition, including, as stated in Chapter 2 of the EIR, a baseline population of 100 students to ensure that the EIR accurately assesses the full scope of potential environmental impacts at the time of the issuance of the NOP. Project impacts are evaluated as the difference between these existing physical conditions and the conditions that would result from implementation of the proposed project—not relative to the No Project Alternative. The comment's assertion that referencing the existing CUP "inflates the baseline" conflates the No Project Alternative with the baseline. The EIR distinguishes between the two, using the baseline as the point of reference to measure impacts of the proposed project and the No Project Alternative to provide a comparison of what could be reasonably expected in the future with no change in existing entitlement, as directed by CEQA. Thus, the EIR properly uses existing physical conditions as the baseline for impact analysis and appropriately describes the No Project Alternative as a continuation of uses allowed under existing entitlements. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-24

24. **Construction GHG Emissions:** The EIR acknowledges 6,643 MTCO₂e of construction emissions but proposes no construction-specific mitigation. Feasible measures exist, including renewable diesel, electric power, and idling limits. (Draft EIR p. 276; CEQA Guidelines §15126.4(a)(1))

Response F/O2-24

The comment identifies the project's construction GHG emissions as stated in the Draft EIR and notes that the project does not propose construction-specific mitigation. As stated in Section 3.7, "Greenhouse Gas Emissions and Climate Change Vulnerability," of the Draft EIR, the Bay Area Air District (previously named Bay Area Air Quality District [BAAQMD]) does not recommend a threshold for evaluating construction emissions; nevertheless, construction emissions are disclosed in the Draft EIR for informational purposes. Accordingly, there is no nexus for requiring mitigation measures for the project's construction-related GHG emissions, because mitigation measures are not required for effects that are not found to be significant (State CEQA Guidelines Section 15126.4[a]). No revisions to the EIR are warranted in response to this comment.

Comment F/O2-25

25. **Deferred Hydrology Analysis:** The Hydrology Study omits 0.7 acres of impervious surface—a 13% increase. Deferring analysis to future "code compliance" without specific performance standards violates CEQA's deferred mitigation requirements. (Draft EIR p. 322; Final EIR pp. 364-367; CEQA Guidelines §15126.4)

Response F/O2-25

The comment states the Hydrology Study omits 0.7 acres of impervious surface and that deferring analysis to future "code compliance" without specific performance standards violates CEQA's deferred mitigation requirements. The commenter provided a similar comment on the Draft EIR, and the response can be found in the Final EIR under Response O4-59. This increase in impervious area is analyzed in Draft EIR Impact 3.9-3, and as explained in Final EIR Response O4-59, the hydrology analysis used conservative assumptions (i.e., intended to avoid the risk of understating impacts) regarding site runoff and impervious area to evaluate stormwater conditions. The hydrologic modeling was based on drainage subwatersheds and design storm criteria that intentionally account for variability in site design and surface coverage. Any minor differences between conceptual impervious surface estimates and later refined design quantities do not undermine the analysis or change the significance determination, because the project is required to detain runoff such that postproject peak flow rates do not exceed preproject conditions.

The EIR does not defer the formulation of mitigation. CEQA allows a project to rely on existing regulations and County engineering requirement standards as long as those regulations and requirements set the performance that must be achieved to protect the environment. In this case, the EIR clearly explains the issue being addressed—

potential to increase rates of stormwater runoff—and sets clear requirements the project must meet, including making sure peak runoff does not increase postconstruction and that all drainage systems meet County stormwater standards. As explained in the EIR and Final EIR Response O4-59, the project would be required to implement a stormwater management and detention system that meets specific, objective performance standards, including compliance with Marin County Code Sections 24.04.520 and 24.04.627, the County's Stormwater Control Plan requirements, and applicable BASMAA postconstruction standards. These regulatory requirements mandate that postproject runoff rates and volumes be controlled so they do not exceed existing conditions and that drainage facilities be sized accordingly and include adequate detention to control downstream runoff rates. Compliance with these standards is a condition of project approval and must be demonstrated through final hydrologic and hydraulic calculations reviewed and approved by County staff prior to issuance of grading or building permits. Refinement of stormwater facility sizing during final design does not constitute deferred mitigation because the EIR establishes enforceable performance standards that must be met regardless of final site configuration. Thus, because the outcome is clearly defined and enforceable, this approach is allowed under CEQA and is not an improper deferral of environmental review or definition of mitigation. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-26

26. Hydrologic Design Compliance: Compliance with Municipal Code Section 24.04.520's 100-year design storm requirements cannot be demonstrated when the hydrology study does not model the actual project configuration. (Draft EIR p. 320; Marin County Code §24.04.520)

Response F/O2-26

The comment asserts that compliance with the Municipal Code Section 24.04.520 100-year design storm requirements cannot be demonstrated because the hydrology study does not model the actual project configuration. See Response F/O2-25 in this memo above as well as Final EIR Section 3.2.6, "Master Response: Evaluation of Existing Storm Drain System," Final EIR Response O4-55, and Final EIR Response O4-59.

CEQA does not require final construction drawings or fully engineered drainage plans at the program- or project-level EIR stage. Instead, CEQA requires sufficient analysis to determine whether the project could result in significant impacts and whether adopted mitigation would be effective. Here, the EIR demonstrates that the project would detain and manage stormwater such that postproject peak runoff rates would not exceed preproject conditions under County design storm requirements, including the 100-year storm. This approach is consistent with Marin County Code Section 24.04.520, which establishes performance requirements for hydrologic and hydraulic design rather than mandating that final engineered plans be completed as part of environmental review.

Compliance with Section 24.04.520 is not deferral of mitigation. As disclosed in the EIR, final hydrologic and hydraulic calculations reflecting the precise project configuration are required to be prepared during final design and must demonstrate compliance with the County's 100-year storm criteria prior to issuance of grading or building permits. County staff review and approval of those calculations is a required condition of project approval. This sequencing reflects permissible refinement of engineering design, not a failure to analyze impacts or an improper deferral of mitigation.

Because the EIR analyzed stormwater impacts using conservative assumptions so as not to risk understating impacts, applied County-required design storm criteria, and committed the project to meeting enforceable performance standards through final design review, the hydrology analysis is adequate to demonstrate that the project can comply with Marin County Code Section 24.04.520. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-27

27. GHG Performance Standards: "Maximum extent feasible" describes required effort rather than required outcome. CEQA requires specific performance standards so compliance can be verified. (Draft EIR p. 278; CEQA Guidelines §15126.4(a)(1)(B))

Response F/O2-27

The comment states that the use of “maximum extent feasible” in Mitigation Measure 3.7-1b describes required effort rather than required outcome and does not include performance standards as required by CEQA.

Under CEQA, mitigation measures are required to reduce significant environmental impacts to the extent feasible (Public Resources Code Section 21002.1([)]; State CEQA Guidelines Sections 15021[a], 15091[a][1]). The term “feasible,” as defined in State CEQA Guidelines Section 15364, means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The Guidelines definition does include definitions of nor attempt to distinguish between “effort” and “outcome.” Guidelines Section 15126.4 describes the CEQA requirement for mitigation as “feasible measures,” which in practice involves various types of actions that may avoid or reduce a significant impact. The word “action” and “effort” can be interchangeable. The EIR also includes discussion of mitigation “outcome,” which would be a performance standard necessary to achieve less than significance.

Mitigation Measure 3.7-1b includes language pertaining to feasibility to direct the County to adopt all feasible measures, consistent with CEQA’s requirements. Determining mitigation to be infeasible is based on substantial evidence. This language does not weaken the enforceability of the mitigation measure; rather, it reflects CEQA’s balancing requirement that mitigation must be both effective and capable of being implemented.

The language of Mitigation Measure 3.7-1b provides flexibility to accommodate site-specific constraints while still mandating that the underlying performance objective of the mitigation be met. The County remains responsible for confirming during project implementation that mitigation has been applied to the fullest feasible degree consistent with CEQA’s standard. Marin County does not currently have an established GHG offset policy or program that could be a source of enforceability; therefore, the applicant has the option of decarbonizing buildings, or implementing other equivalent on-site measures, if construction commences prior to the development of such a program. Mitigation Measures 3.7-1a and 3.7-1b include performance standards that meet the requirements of CEQA. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-28

28. **Monarch Butterfly Habitat:** Mitigation prevents removal of roost trees October- March but permits removal April-September with no compensatory habitat requirement within the development footprint. (Draft EIR p. 208; CEQA Guidelines §15126.4(a)(1))

Response F/O2-28

The comment states that Mitigation Measures 3.4-2a and 3.4-2b prevent removal of trees used for overwintering by monarch butterfly from October through March (monarch butterfly overwintering period) but permits removal of the trees outside the overwintering period without compensatory habitat requirements. As discussed on page 3.4-19 of the Draft EIR, stands of mature trees in the northern portion of the project site within the Woodland Buffer and within the Seminary Point Planning Area may be suitable for use as overwintering roosts (WRA Environmental Consultants 2010); however, no overwintering roosts have been documented on the project site (CNDDDB 2022; Western Monarch Milkweed Mapper 2023). Consequently, based on absence in the recent past, it would be reasonable to conclude there is minimal potential for a roost to occur on the project site in the future.

Although monarch butterfly is considered a candidate for protection, based on the US Fish and Wildlife Service determination that listing of the species was warranted but precluded by higher priority actions (USFWS 2020), there is no compensatory habitat mitigation requirement for removal of overwintering habitat. However, as discussed in the Draft EIR under Impact 3.4-2 (“Potential Disturbance or Loss of Monarch Butterfly”), the EIR conservatively recognizes the potential to disturb overwintering monarch butterflies and alter overwintering habitat, despite the absence of roosting in recent past records. This approach is intended to avoid the risk of understating an impact.

If a monarch roost of overwintering monarch butterflies was disturbed, it could substantially reduce the habitat for this species, cause the local populations of monarch butterfly to be reduced below self-sustaining levels, and

substantially reduce the numbers of monarch butterfly. Implementation of Mitigation Measure 3.4-2a would first require the applicant to retain a qualified biologist to conduct monitoring within the stands of mature trees along the Woodland Buffer and within the Seminary Point Planning Area for monarch butterflies during the overwintering period to determine use of the site by the species. Should it be found that monarch butterflies are using stands on the project site, the applicant shall avoid vegetation removal within occupied stands during the overwintering period. Moreover, the Draft EIR required Mitigation Measure 3.4-2b, which further minimizes impact to monarch butterfly should they be detected during monitoring pursuant to Mitigation Measure 3.4-2a. This would require the applicant to follow the guidelines in *Protecting California's Butterfly Groves, Management Guidelines for Monarch Butterfly Overwintering Habitat* (Xerces 2017) to maintain or improve the suitability of stands within undeveloped portions of the project site for overwintering monarchs. Mitigation Measure 3.4-2b also outlines that the actions for implementation of this measure will be conducted in coordination with the County and include requirements and specifications for maintaining or improving key habitat variables, removal or trimming of trees to facilitate solar radiation within the stand and to remove hazards, and the planting of trees where appropriate, and shall maintain or improve habitat structure for overwintering monarchs within undeveloped portions of the Woodland Buffer and within the Seminary Point Planning Area on the project site. This is acceptable mitigation because it reduces the potential for direct mortality, harassment, and disturbance of monarch butterfly, even though the species has no statutory prohibition or regulatory requirement for mitigation related to overwintering habitat modification. Furthermore, it includes requirements to maintain or improve the suitability of stands within undeveloped portions of the project site for overwintering monarchs should they be found during the implementation of Mitigation Measure 3.4-2a. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-29

29. **Short-Term Visual Impacts:** Visual simulations depict conditions five years postconstruction when mitigation trees have matured. The analysis does not address visual impacts during years 0-5 while sky-lining remains unscreened. (Draft EIR pp. 131, 151; CEQA Guidelines §15126.2(a))

Response F/O2-29

The comment asserts that the visual simulations depict project conditions 5 years postconstruction and the Draft EIR did not separately address the visual sky-lining effects during an interim 0- to 5-year growth period while landscaping and planting mitigation matures. ("Sky-lining" is interpreted in this response to mean a structure that is visible above a vegetated ridge or other existing visual line between ground and sky.) The Draft EIR did not present separate interim-year simulations, because any new construction could temporarily place a building structure above an existing sky line, depending on the observer's viewpoint. Rather, the visual analysis conclusions address the long-term outcome and remain adequate. As described beginning on page 3.1-31 of the Draft EIR, the methodology for the visual analysis was designed to evaluate the overall pattern, form, scale, color, and texture of the proposed development in relation to the surrounding landscape. The visual simulations, explained on page 3.1-32 of the Draft EIR, intentionally assume an approximate 5-year postconstruction vegetative condition in order to assess the long-term effectiveness of required mitigation measures, consistent with CEQA's emphasis on whether impacts would remain significant after mitigation.

Under Impact 3.1-1 ("Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality"), the Draft EIR discloses that views from the southwest and west would contain the upper levels of the residential care facility against a skyline backdrop. Key Observation Point #23, which shows a view of the project site from the Richardson Bay Shoreline public access point adjacent to Shoreline Office Center, would present views of the project site where sky-lining of the residential care facility would also be visible. The analysis under Impact 3.1-1 recognizes that the degree of screening the view of the residential care facility would be dependent on the density and coverage of native shade tree planting on the hillside and that sky-lining would be visible prior to full maturation of landscaping. To address these conditions, the Draft EIR identifies and includes specific mitigation measures focused on minimizing long-term visual impacts. Figure 3.1-27, "Mitigation Planting Areas," of the Draft EIR identifies where mitigation planting would be implemented for Mitigation Measures 3.1-1a through 3.1-1c in order to minimize the visual impacts of the project.

Mitigation Measure 3.1-1c directly addresses the sky-lining impacts of the residential care facility and requires that fast-growing trees be part of the project plans for the areas on the north and east sides of the facility so that, with time, a natural-appearing backdrop is created. The mitigation framework also includes long-term landscape maintenance and replacement requirements to ensure the durability and effectiveness of screening.

Although some temporary visibility of a structure above an existing sky line may occur during the initial establishment period for landscaping, seeking to separately analyze, model, or quantify the wide variety of temporary visual conditions that may occur would not be reasonable or provide meaningful information about a project's influence on long-term landscape visibility, which is of the source of potential visual significance to the community. The Draft EIR reasonably focused on the priority of long-term visual conditions after implementation of required mitigation and disclosed that screening would improve as vegetation matures. Any temporary visual conditions during the interim growth period would not result in a substantially different or more severe impact than those disclosed, nor would it change the Draft EIR's conclusions regarding impact significance or mitigation effectiveness. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-30

30. **Geographic Scope for Cumulative Hazards:** Cumulative construction analysis is limited to the Strawberry Peninsula, though Seminary Drive and US 101 access routes serve broader areas where concurrent construction projects would share ingress/egress. (Draft EIR p. 470; CEQA Guidelines §15130(b)(3))

Response F/O2-30

The comment states that the cumulative construction analysis for hazards is limited to the Strawberry Peninsula but that Seminary Drive and US Highway 101 serve broader areas where concurrent construction projects would share ingress/egress. It is unclear what hazard-related issue area the comment is pertaining to. However, as shown in Figure 4-1, "Cumulative Projects," as revised in Chapter 4 of the Final EIR, no cumulative projects are located on the Strawberry Peninsula, including on Seminary Drive. The comment does not identify any specific inadequacies in the analysis or indicate what any unidentified impacts would be. Therefore, no revisions to the EIR are required in response to this comment.

Comment F/O2-31

31. **Campus Event Noise:** Event noise analysis assumes future events will match historical patterns authorized under the 1953 CUP, rather than measuring actual current noise levels. No quantitative modeling of proposed events against measured ambient levels is provided. (Draft EIR p. 367; CEQA Guidelines §15126.2, §15384)

Response F/O2-31

The comment states the EIR should provide quantitative modeling of proposed events against measured ambient levels rather than assuming future events would match historical patterns authorized under the 1953 CUP. As stated on page 3.11-19 of the Draft EIR, "events would be of similar type and scale as those that have occurred in the past on the project site. The types of events that would occur following project development would be similar to the events currently hosted by the University." State CEQA Guidelines Section 15126.2(a) states, "In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced." As included in the Draft EIR, events that would occur as part of the project would be similar to those that occur and have occurred on the project site. Therefore, the project would not result in substantial changes to the existing physical conditions related to campus events, and additional noise analysis is not required. The types of events that would occur are part of the description for the project, and additional substantial evidence is not required to support noise conclusions. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-32

32. Historical Resources Standards: Mitigation allows bypassing preservation for "important structures" or "exorbitant expenditures"—terms that differ from CEQA's defined "feasibility" standard. (Draft EIR p. 187; CEQA Guidelines §15126.4(b)(3), §15364)

Response F/O2-32

The comment appears to assert that terms used in Mitigation Measure 3.3-2 such as "important structures" or "exorbitant expenditures" conflict with CEQA's defined "feasibility" standard. The comment mischaracterizes the mitigation measure and applies an incorrect legal standard. The measure does not allow avoidance of preservation based on generalized concepts such as "important structures" or "exorbitant expenditures" divorced from CEQA. Rather, Mitigation Measure 3.3-2 expressly implements the feasibility standard set forth in State CEQA Guidelines Section 15126.4(b)(3) and Public Resources Code Section 21083.2, which govern mitigation for historical resources and unique archaeological resources, respectively. The measure does not allow the project to ignore or bypass preservation of important archaeological resources. Instead, it follows the requirements already set by CEQA for how archaeological resources must be handled.

Under CEQA, preservation in place is the preferred approach when an important archaeological resource is discovered. Mitigation Measure 3.3-2 requires that preference and only allows other approaches if preserving the resource where it is found truly is not feasible. CEQA defines "feasible" broadly and realistically, recognizing that preservation may not be possible in every situation due to factors such as engineering constraints, safety concerns, or excessive cost that would make the project impractical.

Contrary to the comment's assertion, the measure does not create an automatic exemption from preservation requirements. Any decision that preservation in place is not feasible must be made on a case-by-case basis by the County based on input from a qualified archaeologist and, when Native American resources are involved, in consultation with the appropriate Tribe. If preservation cannot reasonably be achieved, the measure still requires the preparation and approval of a detailed treatment plan—such as careful documentation or data recovery—to ensure the resource is properly addressed.

Accordingly, Mitigation Measure 3.3-2 prioritizes preservation, requires professional and County oversight, and only allows alternative mitigation when preservation in place truly cannot be achieved under CEQA's established feasibility standards. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-33

33. Glare Mitigation Threshold: The 0.6 albedo coefficient for glare mitigation lacks technical justification. Albedo measures total reflectance rather than directional glare—a 0.6 albedo surface can still be highly specular depending on surface finish. (Draft EIR p. 153; CEQA Guidelines §15126.4(a)(1))

Response F/O2-33

The comment references the reflectance coefficient of 0.6 used in Mitigation Measure 3.1-2 to minimize glare impacts from light-value colors of surfacing materials used for the project (such as exteriors of buildings, streets, pedestrian pavements and plazas, and roofs), which may create solar reflectivity and glare that could affect daytime and nighttime views. The comment argues that the use of this coefficient lacks technical justification and a 0.6 albedo surface can still be highly specular depending on surface finish.

As part of preparation of the Draft EIR, 2M Associates was retained to prepare the Visual Resources Technical Report included as Appendix B to the Draft EIR. The technical report was prepared by a professional licensed landscape architect whose work covers all aspects of visual analysis, facility design, and planting/revegetation design and has knowledge of all relevant guidelines regarding visual resource studies and scenic evaluations, having been involved on projects for the US Forest Service, US Bureau of Land Management, Caltrans/Federal Highway Administration, California Public Utilities Commission, Federal Energy Regulatory Commission, Pacific Gas and Electric Company, Southern California Edison, and numerous local jurisdictions throughout California.

On page 3.1-1 of the Draft EIR under the regulatory setting and the California Building Code, the Draft EIR notes that:

“Related to glare, the 2022 California Green Building Standards Code, Title 24 Section A4.106.7 Reduction of Heat Island Effect on Nonroof Areas includes voluntary measures for residential buildings. It states “Use high albedo materials with an initial solar reflectance value of at least 0.30 as determined in accordance with American Society for Testing and Materials (ASTM) Standards E1918 or C 1549.” This is a minimum threshold. For roofs the minimum value threshold varies by Building Climate Zone and building type tier levels (low-rise and high-rise). The project site is in Building Climate Zone 3. There are no minimum thresholds values indicated in the code for low-rise residential roofs in Zone 3.”

Also, on page 3.1-53 of the Draft EIR, Impact 3.1-2 “Create a New Source of Substantial Light or Glare That Would Adversely Affect Day or Nighttime Views in the Area” further explains:

“In relation to glare, albedo, sometimes referred to as ‘reflection coefficient’, is a measure of how reflective a surface is. Albedo is commonly defined by a coefficient value between 0 and 1. The higher the value, the more energy is reflected back to the source. Complete reflection is 1 or 100 percent, and complete absorption is 0. There are no standards in the Marin County building code addressing albedo.”

Generally, an example of surfaces with low albedo would be dark, matte surfaces, such as asphalt or dark roofing, that absorb more sunlight. Surfaces with moderate albedo of approximately 0.25 to 0.45 would include vegetation, soils, and textured concrete. Surfaces with high albedo of approximately 0.6 to 0.9 would be very light or smooth surfaces, such as white roofs, polished metal, or glass. Thus, the use of an albedo coefficient maximum of 0.6 was used as a way to measure the maximum reflection that should be used for project building materials. CEQA does not require modeling of speculative surface conditions or use of a specific glare standard, particularly where no adopted glare threshold exists.

On page 3.1-46, the Draft EIR recognizes that the exteriors of the proposed buildings are to be light-valued off-white cement plaster. In addition, streets and pedestrian pavements would use high albedo surfaces that are also light valued in color. On page 3.1-53, the Draft EIR identifies that the viewers most affected would be the residents and visitors within the project area. Foreground views from neighboring areas located above the project site looking downward into the project site could also be affected, such as along Campus Drive (Draft EIR Key Observation Point #2). The remaining foreground and middle-ground views into the project site from surrounding areas are generally from inferior viewing positions such that there would be no significant glare impacts caused by use of albedo materials.

The Draft EIR found that depending on the reflective coefficient value to be employed, albedo surfacing materials may create solar reflectivity and glare that could affect daytime and nighttime views. The topic of glare is synonymous with specular character, which means having the reflective properties of a mirror. To reduce this potentially significant impact to less than significant, the Draft EIR included Mitigation Measure 3.1-2, which requires the reflection coefficient for albedo surfaces not exceed a maximum of 0.6. Additionally, to reduce impacts related to color contrast with the surrounding natural landscape and community setting, the Draft EIR included Mitigation Measure 3.1-1d (“Reduce Color Contrast”), which would require project building materials to include a variety of light and slightly darker-valued earth-toned materials that are flat and nonreflective (either integral to the material or painted). With a combination of implementation of these mitigation measures, impacts related to new sources of substantial glare would be reduced to less than significant.

Overall, the comment appears to conflate albedo (overall solar reflectance) with specular reflectance, which relates to how light is reflected based on surface finish. The use of an albedo cap of 0.6 functions as a conservative upper limit, not an assumed design condition, and serves as a performance standard to prevent the use of highly reflective materials while allowing flexibility in final design. As disclosed in the Draft EIR, impacts related to glare would be reduced through implementation of Mitigation Measure 3.1-2. Additionally, impacts would be further reduced with the implementation of Mitigation Measure 3.1-1d, which separately directly avoids polished, glossy, or mirrorlike finishes that could create concentrated glare, regardless of albedo value. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-34**34. The following revisions indicate new unaddressed impacts or other legally actionable defects within the FEIR:**

- a. Fossils were found on site: Page 4-24: After saying in the Draft EIR that the Franciscan Complex found at the project would not contain identifiable fossils, the revised Final EIR contradicts that as follows:

"...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.)"

Response F/O2-34

The comment asserts that revisions to Impact 3.6-7 on page 4-24 of the Final EIR disclosed new unaddressed impacts or other legally actionable defects. This assertion is incorrect. The revisions referenced in the comment are related to Final EIR Comment O4-47 where Comment O4-47 requested the EIR acknowledge that fossils have been identified in the Franciscan Complex including in Marin County. As explained in Response O4-47 on page 3-139 of the Final EIR, revisions were made to the EIR to clarify that the Franciscan Complex—which underlies both the project site and portions of the County—has produced three known invertebrate fossils regionally. The revised text represents a minor clarification that the Franciscan Complex that occurs at both the project site and in the County has produced three known invertebrate fossils in Marin County. This clarification provides general geologic background information and does not disclose the presence of fossils at the project site, identify a new paleontological resource, or change the likelihood, severity, or nature of impacts analyzed in the Draft EIR. Thus, the revision does not constitute significant new information and does not result in any new or increased environmental impacts beyond those already disclosed and addressed in the EIR. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-35

- b. Affordable housing destroyed by the project needs to be replaced....and then doesn't need to be replaced

See revisions on p. 4-27: Language from Draft EIR said the "project is not eligible for density bonus..." and then the revised language of the Final EIR says "would not..."

See immediately following changed language the unsupported statement that "Approximately 30% of the proposed project housing units would be occupied by the student, staff....etc." Where is this condition?

Page 4-99 of Revisions changes the existing number of housing units at the Seminary from 139 to 132. [Where did 7 units disappear to?]

Response F/O2-35

The comment asserts that revisions in the Final EIR related to affordable housing disclosed new unaddressed impacts or other legally actionable defects. The edits referenced in the comment regarding eligibility for a density bonus are addressed in Final EIR Responses O3-7, O4-75, I14-6, and I15-2. The comment also questions the assumption that 30 percent of project housing would be occupied by university-affiliated residents. For this, see Final EIR Response O6-11. The comment also appears to question revisions to Draft EIR Table 3.12-4, "Summary of Housing Units On-Site, Including Rental Rates," which appears on Draft EIR page 3.12-13 under a discussion of the environmental setting for affordable housing. Table 3.12-4 of the Draft EIR provides a column for the total unit count in the Chapple Drive, Hodges/Shuck, and Reed/Storer/Shuck planning areas. When those units are added together, the total unit count is 132 units. The edits in the Final EIR correct the total from 139 to 132. The difference of the seven units is a result of the seven units that account for the 66 dormitory rooms. As explained in Chapter 2, "Project Description," page 2-7 and Section 3.12, "Population and Housing," page 3.12-12 of the Draft EIR, although the project site does contain 66 dormitory rooms, these units are counted as seven residential units and do not qualify as affordable housing. In addition, the rental rate for one residential unit under this scenario would be \$3,270 and thus would exceed the price for moderate-income households. Moreover, student housing is considered a type of temporary housing and therefore does not meet the criteria for affordable housing. For these reasons, the dormitory rooms are not included as affordable housing. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-36

- c. FEIR Revision discloses the project as proposed would be “noticeably visible” extends 26.75 feet too high above ridgeline. Pages, 4-39 and 4-41.

Response F/O2-36

The comment asserts that revisions made in the Final EIR disclose new unaddressed impacts or other legally actionable defects such as “...the project as proposed would be noticeably visible extends 26.75 feet too high above ridgeline.” The revisions referenced in the comment begin on page 4-36 of the Final EIR under Section 4.3, “Revisions to Section 3.1 Aesthetics.” In this section, it is explained that the revisions clarify the policy consistency discussion of aesthetic impacts of the project associated with policies found to be potentially inconsistent unless mitigated. The revisions apply to Table 3.1-2, “Policy Consistency Analysis,” of the Draft EIR and serve to further clarify why the Draft EIR found the proposed project to be inconsistent unless mitigated with specific County policies. The significance finding of “potentially inconsistent unless mitigated” did not change with any of the edits, and the clarifications do not alter the impact analysis, mitigation framework, or conclusions presented in the Draft EIR. The edits merely add more context as to why the project was found to be inconsistent with certain policies without mitigation. Section 3.1, “Aesthetics,” of the Draft EIR recognized that the residential cluster on the south side of Chapel Hill and the redeveloped Chapel Hill Plaza would be noticeably visible, and that the uppermost component of the residential care facility would extend and would be visible above the ridgeline from various viewpoints, including visibility exceeding the ridgeline height.

Under CEQA, recirculation of an EIR is required only where new information shows the existence of a new significant environmental impact, identifies a substantial increase in the severity of a previously identified impact, or identifies new, considerably different mitigation measure the applicant declines to implement. The revisions mentioned in the comment do not meet these criteria. The cited reference to the project extending approximately 26.75 feet above the ridgeline does not represent a newly disclosed impact, but rather provides additional explanatory detail regarding a visual condition that was fully analyzed in the Draft EIR. The significance determination of “potentially inconsistent unless mitigated” remains unchanged, and no new or more severe visual impacts are identified. Moreover, as disclosed in the Draft EIR, implementation of Mitigation Measures 3.1-1a through 3.1-1d would reduce aesthetic impacts and associated policy inconsistencies to a less-than-significant level. These mitigation measures were not modified in the Final EIR and continue to apply to the project as proposed. Thus, the Final EIR does not disclose new or unaddressed environmental impacts and does not introduce any legally actionable defects. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-37

- d. Revisions disclose that “Emissions of criteria pollutants” would be significantly higher and “exceed thresholds of significance.” Page 4-46.

Response F/O2-37

The comment states that the tables presented on page 4-46 of the Final EIR show emissions that would be significantly higher than the thresholds of significance applied in the analysis (i.e., Bay Area Air District’s project-level CEQA thresholds). Page 4-46 of the Final EIR discloses revisions made to Table 3.2-5, “Maximum Mitigated Emissions of Criteria Pollutants and Precursors Associated with Construction of the Project,” of the Draft EIR to rectify an error identified in the public comment period of the Draft EIR to address the project’s anticipated construction timeline (2023–2027). As shown in the revised Table 3.2-5 in Chapter 4 of the Final EIR, mitigated construction emissions would not exceed the Bay Area Air District’s (previously known as BAAQMD) thresholds of significance; therefore, emissions would not be significantly higher as indicated in the comment. However, in review of the Final EIR, an error in the presentation of unmitigated emissions in Table 3.2-4 was identified. Specifically, the name of the table incorrectly suggested that the modeling results were summarizing mitigated emissions; however, these sums represent the project’s unmitigated emissions. Additionally, it was identified that the conclusion made in Table 3.2-4 incorrectly stated that unmitigated construction-generated nitric oxide (NO_x) emissions would not exceed the Bay

Area Air District's thresholds of significance for NO_x. Notably, Table 3.4-2, as it originally appeared in Section 3.2, "Air Quality," of the Draft EIR correctly reported these unmitigated emissions as exceeding the Bay Area Air District's thresholds of significance for NO_x. In response to the identification of these errors, the following revisions have been made on page 4-45 of the Final EIR to Table 3.2-4 to specify that the emissions totals are unmitigated and that a significant NO_x impact would occur.

ORIGINAL:

Table 3.2-4 Maximum Mitigated Emissions of Criteria Pollutants and Precursors Associated with Construction of the Project

Year	ROG (lb/day)	NO _x (lb/day)	CO (lb/day)	SO _x (lb/day)	PM ₁₀ (Exhaust) (lb/day)	PM _{2.5} (Exhaust) (lb/day)
Average Daily Emissions						
2023	4	33	35	<1	1	1
2024	15	68	82	<1	3	2
2025	15	38	58	<1	1	1
2026	25	7	9 14	<1	<1	<1
<u>2027</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
BAAQMD Thresholds of Significance	54	54	N/A	N/A	82	54
Exceeds Thresholds of Significance?	No	No	N/A	N/A	No	No

Notes: lb/day = pounds per day, ROG = reactive organic gases, NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = sulfur oxides, PM₁₀ = respirable particulate matter, PM_{2.5} = fine particulate matter, BAAQMD = Bay Area Air Quality Management District

Source: Modeling performed by Ascent in 2022.

REVISED:

Table 3.2-4 Maximum Mitigated Emissions of Criteria Pollutants and Precursors Associated with Construction of the Project

Year	ROG (lb/day)	NO _x (lb/day)	CO (lb/day)	SO _x (lb/day)	PM ₁₀ (Exhaust) (lb/day)	PM _{2.5} (Exhaust) (lb/day)
Average Daily Emissions						
2023	4	33	35	<1	1	1
2024	15	68	82	<1	3	2
2025	15	38	58	<1	1	1
2026	25	7	9 14	<1	<1	<1
<u>2027</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
BAAQMD Thresholds of Significance	54	54	N/A	N/A	82	54
Exceeds Thresholds of Significance?	No	No Yes	N/A	N/A	No	No

Notes: lb/day = pounds per day, ROG = reactive organic gases, NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = sulfur oxides, PM₁₀ = respirable particulate matter, PM_{2.5} = fine particulate matter, BAAQMD = Bay Area Air Quality Management District

Source: Modeling performed by Ascent in 2022.

As shown in the revision above, a significant NO_x impact was identified in Impact 3.2-1 and Mitigation Measure 3.2-1, "Apply Tier-4 Final Emission Standards to All-Diesel Powered Off-Road Equipment," was recommended as a result. Mitigation Measure 3.2-1 requires construction contractors to use engines meeting EPA's Tier 4 final emissions

standards, which would reduce NO_x exhaust emissions to below the Bay Area Air District's thresholds of significance, as shown in Table 3.2-5. This does not identify a new impact that had not previously been addressed in the EIR. This revision to the Final EIR does not alter the findings of the Draft EIR.

Comment F/O2-38

- e. Revisions add new language re: endangered bird species and peculiar rationale at Page 4-53. New language re: Bald Eagle, California black rail, and Californian Ridgway's rail. Strange rationale is also new language...
"...because once construction occurs, these currently unmaintained areas would likely only attract nesting bird specials that are more tolerant of human disturbance."

Response F/O2-38

The comment notes that revisions were made in the Final EIR in response to Comment A2-3 from the California Department of Fish and Wildlife, which relates to the potential for nesting habitat for California Ridgway's rail and California black rail to occur within 700 feet of the project site, and recommends mitigation be incorporated to reduce potential impacts to these species. As discussed in Final EIR Response A2-3, Appendix F of the Draft EIR identified that habitat for California Ridgway's rail and California black rail does not occur within the project site and that habitat for these species occurs across Seminary Drive. Although the majority of the project site is farther than 700 feet from this habitat or is screened from this habitat by existing vegetation and existing development, outdoor construction activities that would occur within the Shuck Drive Knoll portion of the project site would be within 700 feet and lack existing screening.

The Final EIR revised the text of Impact 3.4.4 to reflect that Mitigation Measure 3.11-1, "Prepare and Implement a Construction Noise Control Plan," would require various measures that would reduce construction noise, including use of temporary noise curtains that would reduce noise and visual disturbance to nesting habitat for California black rail and California Ridgway's rail from outside construction activities on Shuck Drive Knoll; however, outdoor construction activities that occur within 700 feet of nesting habitat during the nesting season for California Ridgway's rail and California black rail may still result in impacts to these species due to nest disturbance. Mitigation Measure 3.4-4 was also revised to include a requirement for work to occur outside of the California Ridgway's rail and California black rail nesting season, or if work is required during the nesting season, a requirement that surveys be conducted, and 700-foot no-disturbance buffers be placed around any California Ridgway's rail or California black rail nests found during the required survey. These revisions represent minor modifications to the EIR because they incorporate the existing text from Mitigation Measure 3.11-1, and revisions to the existing Mitigation Measure 3.4-4 to extend the survey area for nesting birds and the existing nesting season protections to California black rail and California Ridgway's rail. These revisions did not change the significance conclusions of the EIR. They provided clarification that Mitigation Measure 3.11-1 would provide noise reduction from construction in the Shuck Drive Knoll area for nesting birds in habitat across Seminary Drive, and that the nesting season outlined in Mitigation Measure 3.4-4 includes all special-status birds and other common nesting birds.

The comment also makes reference to revisions made in the Final EIR in response to Comment O4-29, which was provided by a third party retained by the Seminary Neighborhood Association. Comment O4-29 stated that landscaping and maintenance would be increased in areas of the project site that are presently undisturbed and that the increased intensity of landscaping and maintenance on the site should be analyzed for impacts to white-tailed kite, common raptors and other common nesting birds. As discussed in Final EIR Response O4-29, clarifying text was added to Impact 3.4-4, "Potential Disturbance or Loss of Special-Status Birds and Other Common Nesting Birds," to clarify the analysis of maintenance and landscaping impacts on how the potential for adverse effects would occur on nesting birds from ongoing activities, such as maintenance and landscaping, in areas not currently subject to these activities. The context for the edits is in relation to nesting birds and maintenance and landscaping activities that could occur in areas that are presently undisturbed. The clarification is outlined on Final EIR page 3-115 and states, "In addition, ongoing landscaping and maintenance activities (other than defensible space and fuels management activities) within portions of the project site that are not currently maintained would not have a substantial adverse effect on special-

status birds and common raptors and other common nesting birds, because once construction occurs, these currently unmaintained areas would likely only attract nesting bird species that are more tolerant of human disturbance." These edits convey that once construction commences, currently unmaintained areas of the project site would likely no longer be attractive nesting locations for more sensitive bird species due to the presence of more human activity in these areas. Instead, bird species that are more tolerant of human disturbance would likely nest in these areas and would be less likely to be adversely affected by the expansion of routine landscaping and maintenance activities into currently unmaintained areas. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-39

- f. High evacuation scores are strangely minimized with unsubstantiated assertion that E. Strawberry Drive will be a "secondary option for evacuation." Page 4-71.

Response F/O2-39

The comment asserts that high evacuation scores are minimized with unsubstantiated assertion that East Strawberry Drive will be a "secondary option for evacuation." As stated on page 3.8-21 of the Draft EIR, an analysis of the proposed project's physical impacts on evacuation routes is provided in Section 3.14, "Transportation," of the EIR. The analysis of emergency response and evacuation in Impact 3.8-4 of the Draft EIR focuses on the proposed project's potential to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Thus, the analysis in Impact 3.8-4 summarizes the relevant analysis from Draft EIR Section 3.14 as it relates to adopted emergency response plans or emergency evacuation plans and refers the reader to Section 3.14, where a detailed analysis of physical impacts on emergency evacuation can be found. Importantly, neither the Marin County Operational Area Emergency Operations Plan nor the Marin County Multi-Jurisdictional Local Hazard Mitigation Plan identify specific emergency response or evacuation routes for Marin County.

As detailed in Impact 3.14-4 of the Draft EIR, Seminary Drive and East Strawberry Drive are logical evacuation routes because they provide direct connections to US Highway 101 and State Route 131, respectively. Additionally, both roadways provide wider right-of-way in comparison to many of the smaller local roadways within the project site, some of which dead-end, and thus, could accommodate higher traffic volumes in the event of an emergency.

As discussed in Sections 3.8 and 3.14 of the Draft EIR, MWPA completed a comprehensive and rigorous overall Evacuation Ingress/Egress Risk Assessment of Marin County evacuation routes to understand evacuation risks, score the risk, and address the risks associated with each route. As part of this effort, MWPA identified three high-level evacuation risk scoring categories: fire and fuels, roadway, and communication. For each evacuation difficulty category (fire and fuels, roadway, communication), three aggregate difficulty scores were developed for (1) fixed risk scores, (2) variable risk scores, and (3) combined risk scores. Aggregate difficulty scores provide an assessment of combined, or overall, risk based on relative risk from individual risk factors associated with each category. Local officials can use these three aggregate evacuation difficulty scores to identify and prioritize mitigation actions to reduce evacuation risk. A lower difficulty score indicates fewer constraints; for example, a low roadway difficulty score indicates roadways that are less likely to experience issues during an evacuation. A high score indicates roadways that may have a higher likelihood of congestion, reduced ingress/egress, low access to critical infrastructure, and/or extreme fire behavior during an evacuation (MWPA 2023).

According to MWPA's Evacuation Ingress/Egress Risk Assessment GIS map viewer, the roadways identified above that would serve as evacuation routes for the project site have evacuation difficulty scores (roadway and aggregate) ranging from minimal to low and include Seminary Drive from Gilbert Drive to US Highway 101 (minimal), Seminary Drive from Gilbert Drive to Strawberry Lane (low), and East Strawberry Drive from Strawberry Lane to approximately Island Drive (low). Although the other roadways in the project area identified in the comment have evacuation difficulty scores ranging from moderate to high, including portions of East Strawberry Drive, as indicated in Impact 3.14-4 and shown on Figure 3.14-1, "Evacuation Routes," of the Draft EIR, Seminary Drive would likely serve as the primary evacuation route for project-related traffic due to its direct access to US Highway 101 from the project site.

Additionally, as indicated in Response O2-7 of this memo, the evacuation analysis in Draft EIR Section 3.14 conservatively assumes full residential occupancy, visitors, students, and employees present at the same time, resulting in an estimated evacuation demand of approximately 5,326 vehicles. This approach intentionally avoids understating evacuation conditions. In an evacuation scenario, normal stop controls and typical traffic operations would likely give way to a continuous outbound movement of vehicles, with both lanes used to move traffic off the peninsula. Under these conditions, roadway capacity is driven by overall outbound flow, and driver familiarity would not be expected to materially affect evacuation performance. Even with these conservative assumptions, estimated evacuation demand remains below the outbound capacity of Seminary Drive and East Strawberry Drive.

Taking all of these factors into account, Section 3.14 of the Draft EIR concluded that the combination of potential evacuation routes, which includes a roadway with minimal to low evacuation difficulty score as the anticipated primary evacuation route, would provide first responders with the opportunity to identify the best route based on conditions at the time of evacuation as well as provide substantial evacuation capacity. Therefore, the project would not result in an adverse evacuation impact. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-40

- g. Page 4-86: New language which says that failure to do parking demand reduction, and road widening will result in campus enrollment being limited to 50% or less. Where is this mitigation condition?

Response F/O2-40

The comment asserts that Final EIR Page 4-86 improperly introduces new language that says failure to do parking demand reduction and roadway widening will result in campus enrollment being limited to 50 percent or less and asks where this mitigation condition is identified.

As described in Draft EIR Section 3.14, "Transportation," on pages 3.14-19 and 3.14-20, Mitigation Measures 3.14-3b and 3.14-3c reads as follows:

Mitigation Measure 3.14-3b: Widen Roads to Meet County of Marin Roadway Standards and ADA and PROWAG Guidelines for Transportation Accessibility

The project applicant shall provide roadway, parking, and pedestrian facilities that meet ADA and PROWAG guidelines. The project applicant shall incorporate into the project the widening of both public and private roads to meet County of Marin road design standards as identified in Marin County Code Section 24.04.110. The project shall be subject to review by County of Marin Public Works staff to ensure all federal and County requirements and regulations are met and ensure the safe movement of all modes of transportation navigating the project site. The project applicant shall submit a waiver request for any existing or planned road, pedestrian, bicycle, transit, or parking facilities or services on the site that will not meet County roadway, ADA, or PROWAG standards.

Mitigation Measure 3.14-3c: Implement Measures to Reduce Parking Demand and/or Increase Supply for the Academic Campus

The project applicant shall prioritize implementation of parking demand reduction measures for faculty, staff, and students of the academic campus to address the estimated parking deficit of 144 parking spaces. Prior to achieving 50 percent enrollment of the academic campus, the project applicant shall submit a parking report that documents academic campus parking usage and any parking overflow onto adjacent residential streets (based on surveys conducted by an independent professional transportation consultant approved by County of Marin Public Works staff), as well as the status of all parking demand reduction measures. The report shall verify that campus parking occupancy levels do not exceed 90 percent and be submitted to County of Marin Public Works. Should there be excess parking occupancy and overflow conditions, the project applicant shall implement additional parking demand reduction measures and/or new parking supply improvements to address parking shortfalls before any additional enrollment could occur beyond 50 percent. All parking shall

be located on the project site and within the vicinity of the facility that it serves. Off-site overflow parking shall not be an acceptable strategy.

The language added to Draft EIR Table 3.10-1 ("Project Consistency with Applicable Local Policies") on page 4-86 of the Final EIR clarifies the specific mitigation measures that were considered in the land use policy consistency analysis conducted in the table. As demonstrated above, the referenced language appears in Mitigation Measures 3.14-3b and 3.14-3c under Impact 3.14-3 ("Substantially Increase Hazards due to a Geometric Design Feature [e.g., Sharp Curves or Dangerous Intersections] or Incompatible Uses [e.g., farm equipment]") in the EIR to reduce potentially significant impacts related to an increase in hazards due to a geometric design feature or incompatible uses. As explained under Draft EIR Impact 3.14-3, Mitigation Measure 3.14-3b requires the project applicant to design internal roadways to meet Marin County 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. In combination with Mitigation Measure 3.14-3a, safety impacts exacerbated by the project would be reduced to less-than-significant levels. Thus, the language referenced in the comment does not constitute a new mitigation condition, does not disclose new environmental impacts, and does not create a legally actionable defect. It clarifies the role of existing mitigation measures disclosed in the Draft EIR in supporting the conclusions of Draft EIR Table 3.10-1, and no revisions to the EIR are warranted in response to this comment.

Comment F/O2-41

h. Noise from deliveries is not analyzed for the impact of increased frequency

Page 4-95: There is new language which argues that future noise levels from deliveries will be similar to current noise levels and therefore "would not result in a substantial increase in noise." This fails to analyze the impacts of the increase in the number of deliveries created by a school with more students, the creation of senior living facilities, etc.

Response F/O2-41

The comment states the EIR failed to analyze the impacts of the increase in the number of deliveries created by a school with more students, the creation of senior living facilities, etc. The analysis on page 4-97 of the Final EIR concludes that impacts from deliveries would be less than significant because noise levels would be as loud as 62 dBA at 150 feet (distance to the nearest sensitive receptor), which is lower than existing noise levels of 67 dBA. Although the number of deliveries as a result of the project may increase, it is unlikely that two deliveries would occur simultaneously. Therefore, although the number of deliveries may increase throughout the day, noise levels from deliveries are a single event that would occur for a few minutes for each delivery, and delivery noise would remain below existing ambient noise levels. Assuming that in some instances two deliveries would occur concurrently, noise levels would be approximately 65 dBA at the nearest sensitive receptor, which would remain below existing noise levels of 67 dBA. No revisions to the EIR are warranted in response to this comment.

Comment F/O2-42

i. The revisions made to "Alternative 4" undermine the impact analyses that were done for the Draft EIR and remain unchanged in the Final EIR

Page 4-137: Suspicious new language is introduced to create the possibility that Alternative 4 will not necessarily relocate the Chapel Hill units to a lower elevation. Alternative 4 was primarily about relocating the Chapel Hill units. New language creates a huge loophole by adding the language: ".....the proposed residential units on Chapel Hill would be located to lower elevations within the project site to reduce local ridgeline visual impacts in lieu of or in conjunction with recommended screen views of Chapel Hill units with vegetation." (The underlined words are new.)

Response F/O2-42

The comment asserts that revisions in the Final EIR related to Alternative 4 create a "loophole" allowing residential units on Chapel Hill to remain at higher elevations and undermine the impact analysis conducted in the Draft EIR. As

explained in Final EIR Section 3.2.2, "Master Response: Adequacy of the Range of Alternatives," Alternative 4 considers reconfiguration of land uses in a development plan to reduce environmental impacts and illustrate the incorporation of recommended mitigation measures. The modifications to the development plan are based on impact analysis, County policy interpretation, where potentially significant impacts are identified for the proposed project, and recommended mitigation measures in the EIR. Not all of the reconfigurations considered in Alternative 4 originate from recommended mitigation measures. For instance, a land use configuration change may be considered in addition to, or as an alternative option to, the recommended mitigation approach to reduce impacts.

An example is the Alternative 4 feature of relocating units off Chapel Hill in an alternative land use configuration, as an option that may be implemented in lieu of or in conjunction with recommended screening views of Chapel Hill units with vegetation (Mitigation Measure 3.1-1a). Alternative 4 considers relocating the proposed residential units on Chapel Hill to lower elevations within the project site to reduce local ridgeline visual impacts. The revisions in the Final EIR for this alternative clarify that relocation may be done in lieu of or in combination with Mitigation Measure 3.1-1a. These clarifications are described in Final EIR Chapter 4, "Revisions to the Draft EIR," including the revised text explained on Final EIR pages 4-1 and 4-137. The revised language in the Final EIR does not remove or negate that feature; it clarifies that relocation may occur in lieu of or in conjunction with visual screening measures. This clarification does not mean relocation would not occur—it reflects that Alternative 4 contemplates more than one impact-reduction mechanism.

Because the revisions clarify the manner in which previously analyzed impact-reduction approaches could be implemented and do not identify a new significant impact or a substantial increase in the severity of a previously identified impact, they do not constitute new information requiring additional analysis or recirculation under State CEQA Guidelines Section 15088.5. Thus, the impact analyses prepared for the Draft EIR remain valid, and no further environmental review is required in response to this comment.

Comment F/O2-43

II. RECIRCULATION IS REQUIRED

If significant new information is added to an EIR after notice of public review has been given, but before final certification of the EIR, the lead agency must issue a new notice and recirculate the EIR for comments and consultation. (Pub Res C 21092.1; 14 Cal Code Regs 15088.5; *Vineyard Area Citizens for Responsible Growth v City of Rancho Cordova* (2007) 40 C4th 412, 447.) The CEQA Guidelines specifically state that changes in a project's description, **or the provision of significant new information**, require recirculation of a draft EIR. (14 Cal Code Regs 15088.5(a).)

"Significant new information" requiring recirculation includes:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A 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.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Here, at least the first three of these criteria are met and recirculation is required. The purpose of recirculation is to give the public and other agencies an opportunity to evaluate the new data and any resulting conclusions. (*Spring Valley Lake Ass'n v City of Victorville* (2016) 248 CA4th 91, 108.)

The detailed local and expert comments on the DEIR revealed that there are significant environmental impacts beyond those already acknowledged in the DEIR, that the impacts already identified are more severe, and that additional and different alternatives and mitigation measures need to be considered. The FEIR failed in multiple regards to address these new and different issues. Accordingly, recirculation was absolutely required.

Response F/O2-43

The comment is the same as Final EIR Comment O6-19. See Final EIR Response O6-19, Final EIR Response O4-7, and responses herein. The level of detail and the analysis included in the EIR provide the public and decision-makers with sufficient information about the project to understand its physical and operational characteristics and to make an intelligent evaluation of the nature and magnitude of environmental impacts of the proposed project relevant to a proposed master plan approval and community plan amendment. For each assertion regarding changes made in comments on the Draft EIR and Final EIR, evaluation of the prior EIR disclosures found no new significant impacts or mitigation measures identified in the Final EIR. Additionally, the comments raised in the Final EIR and within this memo have not identified a substantially greater impact than that described in the Draft EIR, and no new feasible alternatives have been added to the EIR. Therefore, the EIR is adequate pursuant to CEQA, and recirculation is not required. No revisions to the EIR are warranted in response to this comment.

INDIVIDUALS

Letter F/I1 Steve Disenhof

January 23, 2026

Comment F/I1-1

The applicant needs to dramatically increase on-site housing for students/staff/faculty and families so as to not adversely impact the Marin rental housing market.

The EIR analysis is flawed due to an erroneous assumption of the size of the school population. All the analysts were instructed to accept this assumption and it has clearly tainted large parts of the EIR.

An assumption was made at the very beginning of this 684 page EIR that is such a fundamental flaw that it mandates that much of the work needs to be reassessed because it is based on the wrong number of students/faculty/staff.

The EIR postulates a faculty/staff population of 253 individuals. That is a 25% employee-to-student ratio.

However, virtually all other tertiary schools in the Bay Area have (non-student) employee-to-student ratios of between 24-89%, with a median of ~35% for undergraduate programs and higher still for the kind of "graduate" school the applicant proposes.**

The EIR continually refers and responds to this low-ball employee number, but in no case compares real data of employee staffing ratios from comparable schools.

I will assume that someone accepted the low-ball number and it was then accepted without question by every analyst afterward, because this is the number they were instructed to work with.

The transportation numbers in the EIR are all based on this flawed assumption. And every person, every trip, every car that is added to the plan is a commuter. All of the following assessments need to be re-analyzed.

Section 3.2.7, Master Response: Traffic Count Data

Section 3.2.8, Master Response: Selection of Intersections for LOS Analysis

Section 3.2.9, Master Response: Project Trip Generation/Internalization

Section 3.2.10, Master Response: Project Trip Distribution

Section 3.2.11, Master Response: Transportation Safety

Section 3.2.13, Master Response: VMT Mitigation Measures

Section 3.2.14, Master Response: Request for Near-Term LOS Analysis

Further, this results in such a significant impact on the cost of Southern Marin rental housing that is also requires further analysis.

The applicant claims the (disputed) right to have a commuter school of 1,000 students. **The applicant is, in effect, asking the EIR to accept a maximum number of students with a minimum number of faculty and staff.**

Following the applicant's own argument, the EIR must analyze the impact of a school using at least the more realistic 35%+employee-to-student staffing.

Since there is no actual lease contract with an educational entity, no one knows what the actual ratio will be and the applicant has reportedly been approaching major institutions, so the EIR must analyze comparable ratios). **That means the analysis must allow for a commuter school with at least 1,350 people (plus staff families), perhaps larger for a graduate program.**

The applicant states that it will provide housing for up to 300 students/staff. Even using this, the EIR/applicant's own low-ball number, **the EIR must evaluate the impact of at least 1,000 people, plus families, dropped into the Marin housing market.**

The EIR claims that there is some vacant housing in Marin. Yet **multiple sources cite a vacancy rate of half of that used by the EIR, approaching critically low levels. The actual housing market is so tight that Mill Valley is currently offering up to \$14,000 per rental for landlords to make local rental housing available.**

What this will do to rent in southern Marin (Mill Valley, Sausalito, Corte Madera, Tiburon, Larkspur and Belvedere:

Adding 1,000 net new renters to this area would likely raise market rents by ~4% above the rate of inflation, with higher localized spikes in the tightest submarkets.

If "real world" staffing numbers are used, 35% and higher, every additional net new renter added to this number will cause an asymmetrically higher rise in rental costs.

As the former managing partner of a Larkspur-based wealth management firm, I understand how minor errors can cascade into major sunk costs. I appreciate that hundreds or thousands of hours have been worked in preparation of this EIR. I know that after 13 years, we all want this to be settled.

But fully half of the EIR analysis is directly tainted by this fundamental flaw.

The EIR needs to be redone using the correct baseline number AND the applicant must be required to add far more housing on-site for students/staff/faculty and families so as to not adversely impact the Marin housing market.

** Bay Area Tertiary School data – non-student employee-to-student ratio (undergraduate and graduate combined):

*St Mary's College Moraga 37%

*Dominican University 50+%

*University of California 89%

*California College of Law 38%

*University of San Francisco 24%

*University of Santa Clara 30%

Response F/I1-1

The comment argues that the faculty and staff population estimate evaluated in the EIR is flawed stating that other tertiary schools in the Bay Area provide an employee-to-student ratio of between 24 percent and 89 percent. The comment also states the EIR should analyze the impacts on housing for 1,000 people plus family and that the vacancy rates in the EIR are incorrect.

As discussed in Draft EIR Chapter 2, "Project Description," as well as Section 3.12, "Population and Housing," and Section 3.14, "Transportation," the academic campus was assumed to operate at up to 1,000 students, consistent with

the existing 1953 CUP. Staffing levels were estimated using a ratio-based methodology derived from existing campus conditions on this project site and applicant-provided information, which estimated staffing levels in the range of 20 to 25 percent of student enrollment.

Specifically, the Traffic Study (Appendix Q of the Draft EIR) assumed that campus staffing would grow at a similar ratio to existing conditions, which reflect approximately 24 staff per 100 students (a 24 percent staff-to-student ratio). Applying that ratio to a 1,000-student campus yields approximately 240 total employees at buildout. Consistent with this approach, the EIR identifies 216 net new employees, which, when added to existing staff, results in approximately 240 total faculty and staff at buildout. This assumption is internally consistent across the Traffic Study and the EIR.

CEQA does not require an EIR to analyze the highest conceivable staffing ratio drawn from dissimilar institutions, nor does it require selection of a median or upper-bound ratio from a regional dataset where no specific tenant or program has been proposed. The institutions cited in the comment vary widely in size, mission, research intensity, residential character, and employment structure, and therefore do not constitute comparable institutions nor substantial evidence that a higher staffing ratio is reasonably foreseeable for the proposed academic campus. The use of a 24 percent ratio falls directly within the estimated range disclosed by the applicant who is familiar with existing and historic operations and represents a reasonable, evidence-based assumption for CEQA analysis. The comment's assertion that the EIR must be redone is based on disagreement with this assumption, which is reasonable, supported by the record, and consistently applied throughout the analysis. Disagreement with methodology or preference for alternative assumptions does not constitute substantial evidence of inadequacy under CEQA.

Regarding housing impacts, as discussed in Draft EIR Section 3.12, "Population and Housing," the EIR evaluates population growth, housing demand, and consistency with applicable regional and local housing regulations based on the maximum reasonably foreseeable enrollment and staffing levels analyzed for the academic campus. The analysis does not assume that all students, faculty, or staff would seek housing in the local rental market and accounts for on-site housing proposed as part of the project, which would reduce off-site housing demand. Moreover, Response O3-7 in the Final EIR updated the housing and vacancy data and analysis in the EIR relying on the current data available at that time from the California Department of Finance. Even with the updates in the Final EIR, the EIR does not identify a significant housing impact because the projected population increase associated with the academic campus, as analyzed, would not substantially alter housing availability within the region. While the comment cites anecdotal information regarding rental prices and vacancy rates, it does not provide substantial evidence demonstrating that the project would cause a CEQA-significant housing impact beyond those evaluated in the EIR. As explained in Final EIR Response O3-2, CEQA requires analysis of physical environmental effects of population growth, not speculative or indirect economic outcomes that cannot be reliably attributed to the project. No revisions to the EIR are warranted in response to this comment.

Comment F/I1-2

The EIR vastly underestimates the impact on transportation of contractors working on the project.

Comment I23-6 Topic: The EIR vastly overestimates the number of local contractors who would work on the project "Construction of the project would occur over approximately 4 years. The size of the on-site construction labor force would fluctuate depending on the phase of work, ranging from approximately 10 to 160 people, depending on the project component and phase under construction. Because most of the labor force would likely be drawn from the large pool of construction workers already living in the region..."

Anyone living in Marin can attest that, overwhelmingly, construction workers likely to be involved in this project will come from outside Marin. Sonoma, Napa, Alameda, Contra Costa and Solano are where these workers will be drawn from. Few will be from Marin. The "average" Marin commute may be 10.3 miles as stated in the EIR, but that is frankly irrelevant to those likely to work on this project. Has the County estimated the average commute of construction workers working in the County? Further, to complete this project in only four years with 10-160 workers significantly underestimates the time frame. Where did the Developer arrive at a four-year estimate? Why has the Planning

Department accepted it? What will be the impact on Marin's traffic and population from the addition of what will likely be hundreds of additional day trips from out-of-Marin workers on Highway 101 and local streets?

EIR Response: ...it is anticipated that most of the construction labor force would come from the surrounding region including those within the Plan Bay Area 2050 Draft EIR's average one-way commute distance of 10.3 mile (MTC and ABAG 2021: Table 3.15-5). Moreover, the Draft EIR recognizes that longer commutes are common for workers living in the Bay Area and that they could also come from portions of the East Bay and San Francisco.

My response: *The EIR just gets this wrong. 10.3 miles is fantasy. 10.3 miles from the Seminary site barely gets one to Terra Linda and/or to the Richmond anchorage of the San Rafael-Richmond Bridge. Workers on this project will likely have commutes far longer and will impact traffic accordingly.*

The EIR analysis needs to be revised to use real-world data for contractors' impact on Marin commutes.

Response F/I1-2

The comment reiterates Final EIR Comment I23-6 and expresses disagreement with Final EIR Response I23-6 stating the EIR assumption of an average one-way commute for construction workers of 10.3 miles is not realistic and underestimates traffic impacts. As explained in Final EIR Response I23-6, the 10.3-mile average worker commute distance used in the EIR is based on regional empirical data and accepted transportation modeling assumptions. Moreover, the Draft EIR recognizes that 10.3 is presented as an average and longer commutes are common for workers living in the Bay Area and that workers could also come from portions of the East Bay and San Francisco. Draft EIR Section 3.12, "Population and Housing," acknowledges that extending the commute distance to approximately 15 miles would expand the region considered in the analysis to include portions of the East Bay and San Francisco, which would substantially expand the population under consideration and reinforce the reasonable expectation that a substantial number of students and employees would not relocate to the project area. The EIR relied on standard one-way commute data used in CEQA transportation analyses for the Plan Bay Area 2050 Draft EIR, which reflect average commute distances for workers across the Bay Area region, rather than anecdotal assumptions about where individual workers may live. The assertion made in the comment is not supported by substantial evidence and does not demonstrate that the EIR's analysis is flawed. CEQA does not require an EIR to assume the longest possible commute or to speculate about individual worker residence locations. Thus, the EIR's use of a 10.3-mile average construction worker commute distance is reasonable, supported by substantial evidence, and consistent with CEQA and accepted transportation analysis methodologies. The commenter has not provided evidence demonstrating that a different assumption is required. No revisions to the EIR are warranted in response to this comment.

REFERENCES

- California Air Pollution Control Officers Association. 2021a. CalEEMod Users Guide – Appendix A: Calculation Details for CalEEMod. Available: <https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6>. Accessed February 17, 2026.
- California Air Pollution Control Officers Association. 2021b. CalEEMod Users Guide – Appendix D: Default Data Tables. Available: [appendix-d2020-4-0-full-merge.pdf](https://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-d2020-4-0-full-merge.pdf). Accessed February 9, 2026.
- California Department of Fish and Wildlife. 2021. Webpage on Natural Communities. List of Sensitive Natural Communities. Available: <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>. Accessed April 2022.
- California Energy Commission. 2025. 2010-2024 CEC-A15 Results and Analysis. Available: <https://www.energy.ca.gov/media/3874>. Accessed February 6, 2026.
- California Natural Diversity Database. 2022a. Results of electronic records search. California Department of Fish and Wildlife, Biogeographic Data Branch. Sacramento, CA. Accessed September 2022.

CAPCOA. See California Air Pollution Control Officers Association.

CDFW. See California Department of Fish and Wildlife.

CEC. See California Energy Commission.

CNDDDB. See California Natural Diversity Database.

Marin Wildfire Prevention Authority. 2024. Evacuation Ingress/Egress Risk Assessment Webpage. Available: <https://www.marinwildfire.org/project/evacuation-ingress-egress-risk-assessment>. Accessed July 2, 2024.

MWPA. See Marin Wildfire Prevention Authority.

Schermerhorn, Adam. Sergeant, Detention Services Bureau. Marin County Sheriff's Office, San Rafael, CA. August 25, 2023—email messages to Jim Merk of Ascent Environmental regarding the impact of the project on the provision of police protection services.

Schneider, Brenton. Sergeant/Public Information Officer. Marin County Sheriff's Office, San Rafael, CA. August 30, 2022—email message to Jim Merk of Ascent Environmental regarding the impact of the project on the provision of police protection services.

US Fish and Wildlife Service. 2020. *Monarch (Danaus plexippus) Species Status Assessment Report*, version 2.1. September 2020.

Western Monarch and Milkweed Mapper. 2023. Occurrence Database. Data accessed from the Western Monarch Milkweed Mapper, a project by the Xerces Society, U.S. Fish and Wildlife Service, Idaho Department of Fish and Game, and Washington Department of Fish and Wildlife. Available: <http://www.monarchmilkweedmapper.org>. Accessed September 2023.

WRA Environmental Consultants. 2010. *Biological Resources Assessment, Golden Gate Baptist Theological Seminary, Marin County, California*. Prepared for: Hart Marin. San Rafael, CA.

Xerces Society for Invertebrate Conservation. 2017. *Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat*. Portland, OR.

Attachment A

Comment Letters

Robin Fies

From: mjlmv@comcast.net
Sent: Saturday, December 20, 2025 3:35 PM
To: EnvPlanning
Subject: Strawberry project

You don't often get email from mjlmv@comcast.net. [Learn why this is important](#)

As a retired Senior Care Manager as well as former manager of Residential Care and Skilled Nursing Facilities, I am concerned about this project's viability.

Many surveys indicate that a large number of seniors prefer to remain in their own homes, and hire caregivers when this is warranted.

Most facilities in Marin and other Counties struggle with recruiting, training, and retaining adequate staff at regulation staffing levels, often putting the care and needs of Seniors at risk. This is already a fact in some facilities in Marin County. In addition, frequent change of ownership increases the price of residing in these facilities.

My vote is to NOT approve the building of this facility, and to focus on more senior friendly communities that allow seniors to remain in their homes.

Respectfully,

Michael J. Levy
Tam Valley

Robin Fies

From: bf@u-write.com
Sent: Thursday, January 1, 2026 1:57 PM
To: EnvPlanning
Subject: Feedback re 201 Seminary Drive development

You don't often get email from bf@u-write.com. [Learn why this is important](#)

Hello,

I am closer to a NIMBY than a YIMBY, but once every generation or so there is a *no-brainer*. This is that.

I used to live in the apartments on Seminary Drive; I know the neighborhood and I've walked the campus countless times; it's a beautiful location.

Of course the neighbors have organized to fight most anything being built on this land. I get it; no one wants *one* more vehicle going by their house, or *any* extra cars adding a minute or three to their commute to the freeway onramp. But this is a *once-in-a-generation* opportunity to plan for a thousand or more *nice* apartments on this precious land. I say *precious* land, and it is. *That's* why it should not be allowed to be the site of *any* single-family homes. The current proposal is 337 single- and multi-family homes on 127 acres. That's less than three homes per acre... an insane failure to grasp what's possible. Note that I am not advocating for more below-market-rate accommodations; basic economics teaches us that the way every North Bay renter benefits is by adding meaningfully to the supply.

Marin County has allowed the quality of life to slip in countless neighborhoods by succumbing to the California bureaucrats who authorized ADUs and denser construction without mandating appropriate off-street parking for these additional accommodations. Here's a chance for the County to do something better - to step-up and mandate 21st-century housing (with parking!) at this beautiful site. Yes, have a greenbelt or some such transition to "protect the value" of the housing already on the hill, and don't authorize five-story buildings that will look out of place. But do require a lot more multi-unit residential.

Thanks for listening.

Bill Ross Fridl
Mill Valley, CA
bf@u-write.com

Robin Fies

From: Jane Markell <jane.markell@gmail.com>
Sent: Tuesday, January 13, 2026 5:41 PM
To: EnvPlanning
Subject: Seminary Redevelopment Project NorthCoast Holdings

You don't often get email from jane.markell@gmail.com. [Learn why this is important](#)

Dear Environmental Planning,

I am a resident of Strawberry in Mill Valley. I live just around the corner from the Seminary Property under consideration for redevelopment. I am the President of my HOA, which is comprised of 52 homes on Strawberry Hill. I have lived here for 20+ years. Since I moved to Strawberry in 1996, the growth in traffic and congestion has increased significantly. With the proposed additional housing, senior housing facility, and school, the expansive development would completely overwhelm our infrastructure, natural habitats, and resources.

I am writing to express my views as a long-time resident. I've attended many meetings over the years. The developer is clearly not listening to the community. We are open to reasonable development, and housing, single-family, and apartments are needed and mandated by the state. We understand this. However, the school with 1000 students, teachers, etc., is an unnecessary burden and on top of this, senior residence, when a new facility was just approved on North Knoll across Tiburon Blvd., this makes no sense.

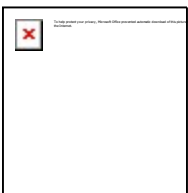
If the developer presents a reasonable number of new people and addresses the traffic, water, natural resources, and infrastructure issues for that number, the community might be open to compromise.

What I've observed from the beginning with this developer is the same proposal, presented over and over with no changes, no reflection of our concerns year after year. This is not the way to work with the community, and our county must support the community and force the developer to make changes and reduce the scope of this project to move it forward.

Thank you for your consideration,

Jane Markell

75 Milland Drive
Mill Valley, CA



Jane Markell
JEM Marketing

+1 415-269-8285

jane.markell@gmail.com

Robin Fies

From: No-Reply
Sent: Thursday, January 15, 2026 11:51 AM
To: EnvPlanning
Subject: Re: Strawberry Housing Proposal [SENT FROM A PUBLIC FORM]

Contact Us

Email To: EnvPlanning@MarinCounty.gov

Hosted Page: <https://www.marincounty.gov/departments/cda/planning/environmental-planning/current-ceqa-projects/north-coast-land-holdings-llc-environmental-impact-report/north-coast-noa-final-eir>

To: Environmental Planning General Contact

From: Mary Holman

Sender's Email Address: mmiller108@gmail.com

Subject: Strawberry Housing Proposal

Message: The number of low income housing units is inadequate, given the historic lower middle class housing quality of the Strawberry area. This kind of development exacerbates shortages of teachers and forces massive levels of out of county commuter workers. The "low income" for the area is beyond the reach of most middle class workers. The median household income is \$171,000 for a 5 mile radius around Strawberry.

2026-01-15 11:43AM -0800
IP: 2600:1010:a011:e92a:c198:5b8f:b306:83f3

Robin Fies

From: David Mobley <david.p.mobley@gmail.com>
Sent: Wednesday, January 21, 2026 8:32 AM
To: EnvPlanning
Subject: Public Comment – North Coast Land Holdings / Former Seminary Project

You don't often get email from david.p.mobley@gmail.com. [Learn why this is important](#)

To Whom It May Concern,

I am submitting this email as a formal public comment regarding the North Coast Land Holdings proposal for the former Golden Gate Baptist Seminary site.

I strongly oppose this project as currently proposed. My concerns include the scale and density of development, significant traffic impacts on already congested local roads, increased vehicle emissions, noise impacts in a historically quiet area, wildfire evacuation and emergency access risks, and potential runoff and pollution into Richardson Bay. I also believe the project is inconsistent with the Strawberry Community Plan and relies inappropriately on a 1953 conditional use permit to justify modern, high-intensity development.

Additionally, much of this proposal appears driven by state-mandated housing requirements that place disproportionate burdens on local communities, while the policymakers responsible will not experience the impacts themselves. This disconnect should not override legitimate local safety, environmental, and quality-of-life concerns.

Please confirm receipt of this comment and acknowledge that it has been entered into the official record and will be reviewed as part of the decision-making process.

Thank you for your time and consideration.

Sincerely,

David Mobley

David Mobley
720.569.6939



Protecting Marin Since 1934

January 20, 2026

Rachel Reid, Environmental Planning Manager
Michelle Levenson, Principal Planner
Marin County Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
Email: EnvPlanning@marincounty.org

**Subject: North Coast Holdings, LLC, Seminary at Strawberry development project
Final Environmental Impact Report**

Dear Ms. Reid and Ms. Levenson:

Marin Conservation League (MCL) has reviewed and hereby submits comments on the Final Environmental Impact Report (DEIR) prepared for the North Coast Holding, LLC – Seminary at Strawberry development project. In 2024, MCL commented on the Draft Environmental Impact Report (DEIR) and submitted detailed comments to the County of Marin (comment letter dated September 5, 2024). Our review and comments on the DEIR took into consideration alignment with MCL’s longstanding mission, which is, *“To preserve, protect and enhance the natural assets of Marin in a changing environment.”*

In reviewing the recently released FEIR, MCL is pleased to see that the County prepared responses to MCL’s comment letter on the DEIR. While we do not agree with several of the responses to our comments, overall, the responses were detailed and concise. In addition, for the most part, the “Master Responses” have provided additional clarity and information, which is helpful.

While we found the DEIR to be well-written and supported by sound technical studies/reports, in reviewing the FEIR/Response to Comments document, MCL remains significantly concerned about the lack of detailed description of the academic campus component of the Seminary site. Unfortunately, this weakness in the project description undermines the good analysis that was prepared for the other components of the Seminary project.

As we previously commented, the DEIR project description for the academic campus merely repeats what would have been permitted under the County-approved 1953 Conditional Use Permit (CUP), which broadly specifies an educational campus for up to 1,000 students supported by faculty and staff. In 1953, the Seminary property covered a larger area (before portions of the original property were allowed to be sold off for market-rate residential development under the Seminary Master Plan approved by the County in 1983). Consequently, the DEIR analysis of the topic areas for this component of the project presents broad findings that are lacking in factual detail. MCL acknowledges that at the present time, there is no specific academic institution that is proposing tenancy and operation of the campus, which would offer more specific details for analysis. Nonetheless, without more specific details of the academic institution being described, the impacts of this major use component of the project cannot be adequately analyzed at a project level

review. The physical environmental impacts vary dramatically by the type of academic institution, the activities and any new facilities proposed. For example, a small higher-level education college campus with onsite student housing would have dramatically different transportation impacts, and consequently air quality and GHG impacts, than a commuter-type college campus or a private K-12 school serving the Marin County community.

PHONE: 415.485.6257
FAX: 415.485.6259

EMAIL: mcl@marinconservationleague.org
WEB: marinconservationleague.org

ADDRESS: 175 N. Redwood Dr., Ste. 135
San Rafael, CA 94903-1977





Protecting Marin Since 1934

In response to this issue, County staff has positioned that the academic campus use component is not a part of the Seminary project and is therefore not subject to CEQA analysis under this environmental document. However, the project description in the DEIR and project updates presented in the FEIR clearly include the academic campus component. The academic campus is presented in both the project description text and all the supportive graphics depicting the site area and site improvements. Therefore, it is part of the whole of the Seminary project site.

The lack of detail and uncertainty regarding the academic campus use, coupled with the position that this use is not a part of the Seminary project raises the question of "piecemealing" the environmental review process. Piecemealing involves the impermissible breaking up of a project into smaller pieces in a way that obscures the full environmental impact of the project. The California Environmental Quality Act (CEQA) defines a "project" broadly to encompass the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Without a detailed description of the academic campus, there are consequences in overlooking the collective and cumulative effect of the whole of the action on the Seminary project.

We also wish to acknowledge and concur with the DEIR comment letter from City of Mill Valley regarding the LOS analysis and request additional study of critical intersections both east and west of the 101 interchanges where delays may be further impacted at peak hours by traffic generated by the project. We note that while an intersection analysis assessing delay and the LOS methodology is no longer required by CEQA, it is a critical tool for making General Plan consistency findings when considering project merits and taking action on the land use/planning applications. Note that this analysis is particularly critical since the County recently approved a housing/assisted living development at the 70 North Knoll site in Strawberry, which is significantly larger than what was envisioned and planned for and analyzed in the County of Marin Housing Element.

As stated in our DEIR comment letter, MCL acknowledges that there will be future public hearings to consider the merits of the planning applications for the Seminary @ Strawberry development project. While MCL reserves this future opportunity to comment on the merits of the project and land use/planning applications, we would like to continue to note that the Seminary site presents a rare opportunity to develop needed housing in Southern Marin on a developed site with infrastructure, utilities and services.

Again, thank you for the opportunity to comment on the Seminary at Strawberry project FEIR.

Sincerely,

A handwritten signature in blue ink that reads "Mike Swezy".

Mike Swezy
President

A handwritten signature in blue ink that reads "Kate Powers".

Kate Powers
Co-Chair, Land Use Transportation and Water Committee

PHONE: 415.485.6257
FAX: 415.485.6259

EMAIL: mcl@marinconservationleague.org
WEB: marinconservationleague.org

ADDRESS: 175 N. Redwood Dr., Ste. 135
San Rafael, CA 94903-1977



Robin Fies

From: Steve Disenhof (gmail) <sdisenhof@gmail.com>
Sent: Friday, January 23, 2026 4:45 PM
To: EnvPlanning
Subject: Responses to the Final EIR for the North Coast Land Holdings proposal
Attachments: Parking.pdf; Impact on Rental Housing Costs in Southern Marin Adding 1000 new net renters.pdf; EIR is fundamentally flawed due to the use of the wrong baseline number - Disenhof.pdf; Contractor travel distance.pdf; Response to Section 3.2.4 Conditional Use Permit Issues.pdf

You don't often get email from sdisenhof@gmail.com. [Learn why this is important](#)

Attached are responses to the Final EIR for this project, mostly to my own original comments.

Thank you.

-sd

Steve Disenhof
sdisenhof@gmail.com
www.stevedisenhof.com

The EIR vastly underestimates school parking needs.

Comment I23-4 TOPIC: Developer vastly underestimates school parking needs The proposed plan will undoubtedly lead to scores or hundreds of cars to be parked in and around Strawberry. The developer has allotted 241 parking spaces for a 1,000 student (plus staff) school (a vast undercount – the total student/staff number may be over 1,350).

If 30% of the planned housing is allotted to students and staff as per the EIR (difficult to see how even that would be affordable in Marin), that would still require up to approximately 1,000 parking spaces for day students/staff. The shortfall in parking would be ~600 spaces. I'm not thinking just of the school day, but also the "special events" that the EIR and developer is planning for. They can only take up space in residential areas on and off campus. We note that when the Branson school proposed mitigation ideas - carpools etc, with a much more homogenous student population - even it recognized how unrealistic those mitigation ideas were.

Where would these cars go? How does the Developer plan to rectify this shortfall of parking?

EIR Response: The EIR acknowledges the inadequacy of parking plans. The Transportation Impact Study provided in Appendix Q of the Draft EIR determined that the project would need an additional 144 parking spaces.

My Response: *As noted above, not only is the parking plan inadequate, but the numbers are based on a "1,000-student" school and not on the up to 1,350 total people commuting to it (subtracting the on-campus housing estimate).*

As noted above, the EIR's proposed mitigation measures are non-starters. Bicycling? Car or vanpools (from where?). Public transportation? The school is a mile from the stops on 101.

Inevitably, local neighborhoods will be swamped with commuter cars and meters or a system of parking permits will be necessitated throughout Strawberry. (And at whose expense?)

Mitigation: *The applicant needs to provide more parking, significantly above what has already been suggested in the EIR. Further, the County must institute a permit parking plan for all streets within walking distance of the campus, so that neighborhood residents aren't impacted by a deluge of campus-related autos.*

-Steve Disenhof
34 Topside Way, MV

Impact on rental housing market in southern Marin County of adding 1,000 new net renters due to the addition of a 1,000 student / 1,350+ person school (given that up to 300 will be housed on campus).

EXECUTIVE SUMMARY

Adding at least 1,000 net new renters to this area would likely raise market rents by ~4% over the rate of inflation in the short term, with higher localized spikes in the tightest submarkets. Lower-income "workforce" renters (teachers, service staff) would likely be priced out toward North Marin (Novato) or Sonoma County.

DATA

Here are the **most recent available population estimates (or close-to-current estimates) for southern Marin County towns** — most from official county/Dof sources for 2024 and corroborated by recent demographic summaries:

Population Estimates (Approx. Latest)

Town / City	Estimated Population	Source / Year
Mill Valley	~13,635	CA Dept of Finance estimate, Jan 1 2024 (latest official)
Belvedere	~2,043	CA Dept of Finance estimate, Jan 1 2024
Tiburon	~8,809	CA Dept of Finance estimate, Jan 1 2024
Sausalito	~6,856	CA Dept of Finance estimate, Jan 1 2024
Corte Madera	~9,882 (≈10,006 by mid-2024)	CA Dept of Finance Jan 1 2024 & US Census QuickFacts July 1 2024
Larkspur	~12,655	CA Dept of Finance estimate, Jan 1 2024

Notes on the Data

- The **California Department of Finance (DOF)** provides annual population estimates for cities/towns — the most recent official estimates are as of **January 1, 2024** (reported in 2025 releases).
- For **Corte Madera**, the **US Census Bureau QuickFacts** shows a **July 1, 2024 estimate of 10,006**, which is slightly above the DOF's Jan 1 figure, but both are current estimates for 2024.

- These figures are **not yet official 2025 or 2026 estimates from DOF** at the time of writing, but they represent the most recent authoritative population data.

Summary

The towns are relatively small and stable in population:

- **Mill Valley:** ~13.6K
- **Belvedere:** ~2.0K
- **Tiburon:** ~8.8K
- **Sausalito:** ~6.9K
- **Corte Madera:** ~9.9–10.0K
- **Larkspur:** ~12.7K

These are good approximations of current populations going into early **2026**, based on the latest official estimates and mid-year adjustments where available.

How many of these rent versus own their own homes?

Here's the best available **data on how many households in each of the Marin County towns in **rental housing vs. own their homes** (i.e., homeownership vs. renting). Most figures are from **U.S. Census Bureau estimates** (American Community Survey or QuickFacts) or reliable recent housing data:

Mill Valley, CA

- **Owner-occupied:** ~66.1%
- **Renter-occupied:** ~33.9%

(Source: U.S. Census Bureau QuickFacts owner-occupied housing rate 2019–2023 for Mill Valley)

Interpretation: About two-thirds of households own their home, and one-third rent.

Belvedere & Tiburon (combined area)

- **Owner-occupied:** ~73%

- **Renter-occupied:** ~27%
(Source: RentCafe/Yardi Matrix housing data for Belvedere Tiburon area)

For Tiburon specifically:

- **Owner-occupied:** ~67.2%
- **Renter-occupied:** ~32.8%
(Source: U.S. Census data via Wikipedia)

Interpretation: A strong majority of households own their homes in this affluent area, with renters making up roughly a quarter to a third.

Sausalito, CA

- **Owner-occupied:** ~50%
- **Renter-occupied:** ~50%
(Source: U.S. Census data, 2020 Census report; recent ACS tends to be similar but not identical)

Interpretation: Sausalito has one of the **most balanced owner vs. renter splits** among these towns.

Corte Madera, CA

- **Owner-occupied:** ~67.0%
- **Renter-occupied:** ~33.0%
(Source: U.S. Census 2020 data for Corte Madera)

Interpretation: About two-thirds of households own their homes, with about one-third renting.

Larkspur, CA

- **Owner-occupied:** ~48.6%
- **Renter-occupied:** ~51.4%
(Source: U.S. Census 2020 data for Larkspur)

Interpretation: Slightly more than half of households rent in Larkspur; the town has a **near-even split, with a slight renter majority**.

Summary Table

Town	% Own	% Rent
Mill Valley	~66%	~34%
Belvedere/Tiburon area	~73%	~27%
Tiburon (site-specific)	~67%	~33%
Sausalito	~50%	~50%
Corte Madera	~67%	~33%
Larkspur	~49%	~51%

Notes

- These figures are mostly derived from **Census or Census-based estimates (ACS)**, the best large-scale source of housing tenure data.
 - Some data (e.g., Belvedere/Tiburon combined) comes from recent housing market summaries that incorporate Census Bureau data plus additional market research.
 - There can be **slight differences across datasets** (e.g., exact %s change year-to-year), but the overall owner vs. renter patterns in these towns are stable and reflect **high ownership rates in wealthier Marin communities vs. more mixed tenure in places like Sausalito and Larkspur.**
-

ANALYSIS

- Here's a rough—but economist-grounded—dollar estimate of how rents in Mill Valley, Sausalito, Tiburon, Corte Madera, Belvedere, and Larkspur might change if *1,000 new net renters* come into the local market without corresponding new rental supply:

Step 1 — Baseline rents right now

- (Current median/average rents in these Marin communities)

- | • City | • Approx. Median Rent (per month) |
|------------------------------|-----------------------------------|
| • Mill Valley | • ~\$3,500–\$4,400 |
| • Sausalito | • ~\$4,295 |
| • Tiburon | • ~\$5,950 |
| • Belvedere Tiburon combined | • ~\$9,125 |
| • Corte Madera | • ~\$3,595 |
| • Larkspur | • ~\$3,260 |
- These figures represent *current* rental price levels in late 2025/early 2026 and are high relative to national averages because this is a high-cost Bay Area market.

Step 2 — How much rents usually respond to demand

- Economists measure how rents respond to demand changes using rent elasticity to demand:
- A classic housing study finds that a 1% increase in rental demand often leads to only about a 0.26% increase in rents in the short run (because landlords may first reduce vacancy rather than raise rents) when supply can't adjust quickly.
- We'll *apply this rule of thumb* to estimate rent effects from 1,000 new renters.

Step 3 — What a 1,000-renter influx means locally

- To estimate percentage effects:
- Total renter households in these six cities are small.
- For example:

- Mill Valley alone had ~1,869 renter-occupied households (34% of total) as of recent data.
- Combining the six (Mill Valley, Sausalito, Tiburon/Belvedere, Corte Madera, Larkspur) likely yields a few thousand total renter households (<~6,000–8,000); Marin County as a whole had ~189 rentals listed recently with consistent high median rents.
- Let's assume hypothetically these six cities now support ~6,000 total renter households.
- 1,000 additional renters therefore ≈ ~16–17% increase in rental demand for these six communities combined.
- If demand rises ~16% and supply *does not* increase quickly:
- Estimated rent change ≈ $0.26 \times 16\% \approx \sim 4.2\%$ (plus inflation) increase in rents in the short-run.

Step 4 — Translate into monthly dollars

- Below are *approximate dollar impacts* using the ~4% rule of thumb, not including inflation:

• City	• Current Rent	• ~4% Increase	• New Rent Range Estimate
• Mill Valley (~\$3,900)	• \$3,900	• +\$156	• ~\$4,050
• Sausalito (~\$4,300)	• \$4,300	• +\$172	• ~\$4,470
• Tiburon (~\$5,950)	• \$5,950	• +\$238	• ~\$6,190
• Belvedere Tiburon (~\$9,100)	• \$9,100	• +\$364	• ~\$9,460
• Corte Madera (~\$3,600)	• \$3,600	• +\$144	• ~\$3,740
• Larkspur (~\$3,260)	• \$3,260	• +\$130	• ~\$3,390

- *(Note: these are rough estimates based on median/current rents in each area.)*

Interpretation

- If at least 1,000 new renters arrive and *supply does not* keep pace:
- Rents across these small, high-demand, supply-constrained communities could rise on the order of ~3–5% in the short term, with rent increases in dollar terms roughly as shown above (e.g., ~\$150–\$360 more per month depending on community).
- In a typical year, these markets may already see some rent variation month-to-month or year-to-year due to broader regional patterns; but a *one-time surge in local renters of this scale* would be enough to lift rents noticeably relative to status quo.

Important Caveats

- Housing supply matters a lot
- If new units are built (even modestly), *that alone can absorb much of the demand pressure* and keep rent growth near zero or even down slightly. For example, academic estimates suggest adding 1% more rental supply lowers average rents around 0.19% in the short run.
- Market context can mask effects
- Right now, some Marin markets have seen *rent declines or softening* before, meaning vacancy may be higher and demand may be weaker than expected—this could dampen the effect of 1,000 new renters. For example, recent data shows average rents in Mill Valley and some other Marin towns have been volatile or soft year-over-year.
- Elasticities vary
- The 0.26 elasticity is a general estimate. In very constrained, high-income markets (like Belvedere), rents might respond more strongly; conversely, in more elastic markets with more units or vacancy, they might respond less.

Bottom Line (Concrete Estimate)

- If 1,000 additional net renters come with little or no increase in local housing supply:
- Rents across Mill Valley, Sausalito, Tiburon, Corte Madera, Belvedere, and Larkspur could rise roughly ~4%, plus inflation, in the short term, which translates to:
- ~\$150–\$360/month higher rents in these communities,

- **Belvedere & Tiburon likely see the biggest absolute increases because rents are already the highest, and small(er) dollar increases in places with lower existing rent.**

Summary of Economic Impact

Factor	Expected Impact
New Lease Prices	Increase of \$150–\$360+ per month for average 2-bedroom units.
Time on Market	Drop from ~30 days to under 10 days for available rentals.
Displacement	Lower-income "workforce" renters (teachers, service staff) would likely be priced out toward North Marin (Novato) or Sonoma County.

Summary

Adding at least 1,000 net new renters to this area would likely raise market rents by ~4% over the rate of inflation in the short term, with higher localized spikes in the tightest submarkets. Lower-income "workforce" renters (teachers, service staff) would likely be priced out toward North Marin (Novato) or Sonoma County.

REQUIRED MITIGATION:

The applicant needs to dramatically increase on-site housing for students/staff/faculty and families so as to not adversely impact the Marin rental housing market.

Prepared by: Steve Disenhof 1/19/26

The EIR analysis is flawed due to an erroneous assumption of the size of the school population. All analysts were instructed to accept this assumption and it has clearly tainted large parts of the EIR.

An assumption was made at the very beginning of this 684 page EIR that is such a fundamental flaw that it mandates that much of the work needs to be reassessed because it is based on the wrong number of students/faculty/staff.

The EIR postulates a faculty/staff population of 253 individuals. That is a 25% employee-to-student ratio.

However, virtually all other tertiary schools in the Bay Area have (non-student) employee-to-student ratios of between 24 – 89%, with a median of ~35% for undergraduate programs and higher still for the kind of “graduate” school the applicant proposes.**

The EIR continually refers and responds to this low-ball employee number, but in no case compares real data of employee staffing ratios from comparable schools.

I will assume that someone accepted the low-ball number and it was then accepted without question by every analyst afterward, because this is the number they were instructed to work with.

The transportation numbers in the EIR are all based on this flawed assumption. And every person, every trip, every car that is added to the plan is a commuter. All of the following assessments need to be re-analyzed.

Section 3.2.7, Master Response: Traffic Count Data

Section 3.2.8, Master Response: Selection of Intersections for LOS Analysis

Section 3.2.9, Master Response: Project Trip Generation/Internalization

Section 3.2.10, Master Response: Project Trip Distribution

Section 3.2.11, Master Response: Transportation Safety

Section 3.2.13, Master Response: VMT Mitigation Measures

Section 3.2.14, Master Response: Request for Near-Term LOS Analysis

Further, this results in such a significant impact on the cost of Southern Marin rental housing that it also requires further analysis.

The applicant claims the (disputed) right to have a commuter school of 1,000 students. **The applicant is, in effect, asking the EIR to accept a maximum number of students with a minimum number of faculty and staff.**

Following the applicant’s own argument, the EIR must analyze the impact of a school using at least the more realistic 35%+ employee-to-student staffing.

Since there is no actual lease contract with an educational entity, no one knows what the actual ratio will be and the applicant has reportedly been approaching major institutions, so the EIR must analyze comparable ratios). **That means the analysis must allow for a commuter school with at least 1,350 people (plus staff families), perhaps larger for a graduate program.**

The applicant states that it will provide housing for up to 300 students/staff. Even using this, the EIR/applicant's own low-ball number, the **EIR must evaluate the impact of at least 1,000 people, plus families, dropped into the Marin housing market.**

The EIR claims that there is some vacant housing in Marin. Yet **multiple sources cite a vacancy rate of half that used by the EIR, approaching critically low levels. The actual housing market is so tight that Mill Valley is currently offering up to \$14,000 per rental for landlords to make local rental housing available.**

What this will do to rents in southern Marin (Mill Valley, Sausalito, Corte Madera, Tiburon, Larkspur and Belvedere):

Adding 1,000 net new renters to this area would likely raise market rents by ~4% above the rate of inflation, with higher localized spikes in the tightest submarkets.

If "real world" staffing numbers are used, 35% and higher, every additional net new renter added to this number will cause an asymmetrically higher rise in rental costs.

As the former managing partner of a Larkspur-based wealth management firm, I understand how minor errors can cascade into major sunk costs. I appreciate that hundreds or thousands of hours have been worked in preparation of this EIR. I know that after 13 years, we all want this to be settled.

But fully half of the EIR analysis is directly tainted by this fundamental flaw.

The EIR needs to be redone using the correct baseline number AND the applicant must be required to add far more housing on-site for students/staff/faculty and families so as to not adversely impact the Marin housing market.

** Bay Area Tertiary School data – non-student employee-to-student ratio (undergraduate and graduate combined):

*St Mary's College Moraga 37%
*University of California 89%
*University of San Francisco 24%

*Dominican University 50+%
*California College of Law 38%
*University of Santa Clara 30%

The EIR vastly underestimates the impact on transportation of contractors working on the project.

Comment I23-6 Topic: The EIR vastly overestimates the number of local contractors who would work on the project “Construction of the project would occur over approximately 4 years. The size of the on-site construction labor force would fluctuate depending on the phase of work, ranging from approximately 10 to 160 people, depending on the project component and phase under construction. Because most of the labor force would likely be drawn from the large pool of construction workers already living in the region...”

Anyone living in Marin can attest that, overwhelmingly, construction workers likely to be involved in this project will come from outside Marin. Sonoma, Napa, Alameda, Contra Costa and Solano are where these workers will be drawn from. Few will be from Marin. The “average” Marin commute may be 10.3 miles as stated in the EIR, but that is frankly irrelevant to those likely to work on this project. Has the County estimated the average commute of construction workers working in the County? Further, to complete this project in only four years with 10-160 workers significantly underestimates the time frame. Where did the Developer arrive at a four-year estimate? Why has the Planning Department accepted it? What will be the impact on Marin’s traffic and pollution from the addition of what will likely be hundreds of additional day trips from out-of-Marin workers on Highway 101 and local streets?

EIR Response: ...it is anticipated that most of the construction labor force would come from the surrounding region including those within the Plan Bay Area 2050 Draft EIR’s average one-way commute distance of 10.3 mile (MTC and ABAG 2021: Table 3.15-5). Moreover, the Draft EIR recognizes that longer commutes are common for workers living in the Bay Area and that they could also come from portions of the East Bay and San Francisco.

My response: *The EIR just gets this wrong. 10.3 miles is fantasy. 10.3 miles from the Seminary site barely gets one to Terra Linda and/or to the Richmond anchorage of the San Rafael-Richmond Bridge. Workers on this project will likely have commutes far longer and will impact traffic accordingly.*

The EIR analysis needs to be revised to use real-world data for contractors’ impact on Marin commutes.

-Steve Disenhof
34 Topside Way, MV

The EIR literally states throughout that it is based on the 1953 CUP, which is significantly different than the applicant's proposal and will have a significant detrimental impact on Strawberry and Southern Marin.

-Steve Disenhof
34 Topside Way, MV

Throughout its responses, the Planning Department states that it is basing the EIR on the 1953 CUP.

In Section 3.2.4, Master Response: Conditional Use Permit Issues:

The EIR Master Response states in part, "The academic campus would continue to be operated by a university or college, with no change proposed to the scope of the existing 1953 CUP, including the maximum permitted enrollment of around 1,000 higher education students."

This is consistent with the EIR response to my 15 September 2024 letter:

Regarding the comment's concern related to the 1953 CUP, the proposed project does not propose any changes to the 1953 CUP and thus the allowable uses and student enrollment cap regulated under the 1953 CUP remain unchanged.

It is also cited again in the EIR in section 1.4.1, "Academic Campus."

The proposed project would retain the existing academic building, cafeteria, and library; renovate the existing administration building, including adding building floor area; demolish the existing maintenance building and construct a new maintenance building; and would not change the permitted enrollment maximum of 1,000 students per a Conditional Use Permit (CUP) approved in 1953.

The Planning Department was quite clear throughout the EIR that whether the CUP continues to be the determining document is at the discretion of the Board of Supervisors. Therefore, the EIR was based on what was put forward by the applicant - that the applicant has the right to convert the Seminary school into a 1,000 student (1,350+ person) commuter school.

It should be noted that the EIR analyzes maximum student enrollment of 1,000, while using an unrealistic minimum number of school employees. The applicant proposes a faculty/staff of 253 (25%), while a survey of comparable tertiary schools in the Bay Area demonstrate that the actual median ratio of non-student employee to student is over 35% and statistically higher for a "graduate" program as proposed by the applicant. **This technical flaw alone requires the EIR to be reassessed.**

The Board of Supervisors in the 1953 CUP was clear in its intent to allow only a self-contained Seminary in undeveloped Strawberry. At that time, there was nothing but open space and cows. Not hundreds of homes, an active sports club, townhomes, apartments and a school. All of these accessed by two narrow roads that can not be widened.

I suggest that if the applicant were to make the current request for an enormous commuter school in 2025 instead of 1953, the Board of Supervisors would never have agreed to the CUP.

I note the applicant refers to the 1980's Master Plan as superseding the 1953 CUP. Yet the primary County Planner, Don Dickenson, was clear when he – as a Planning Commissioner – told the applicant that the Master Plan in no way permitted the conversion of a Seminary into a commuter school.

I applaud the applicant for wanting to incorporate a multi-generational theme in its plans. Yet, no one wants a commuter school of this size in Strawberry and an inordinate number of the unresolved problems in the EIR specifically relate to the school. The neighbors certainly don't want it. It's inconsistent with State and County attempts to increase housing stock. It will seriously impact transportation and safety and have a profound impact on Marin rental costs. Mitigation measures are non-starters. Bicycling, carpools? From where? Manzanita? The Village? Even Branson, with a homogenous student population and set school hours, realized this was impracticable.

And, **the university community doesn't want a school.** As they say, they've chosen with their feet. Branson walked away. Over 13 YEARS, the developer has approached numerous colleges and universities and they've all turned the site down as unfeasible. And finally the applicant leased it to a human trafficking organization - Olivet University - which was ordered shut down in January due to federal and state charges of racketeering, fraud, labor and human trafficking and other offenses. I've heard that the applicant is now saying they are "close" to a deal; a 'concept of a plan.' We've heard that before over the course of 13 years and in business school we learned "there is no deal until there's a deal."

If up to 1,000+ students, staff, faculty (plus families) will need to live offsite, isn't that antithetical to the stated need for additional housing - and below market-rate housing - in Marin? So the question bears asking, WHAT is the purpose of including the developer's request for a large commuter school in this area? WHY would the County prioritize that over additional housing when such a school will only increase the need for additional housing in Southern Marin and impose substantial impacts on the neighborhood and Marin's resources?

I and others don't know how including a school pencils out for the applicant, but that's not my concern and it shouldn't be yours.

The Strawberry Design Review board told the applicant that it has no right to convert the self-contained Seminary into a commuter school.

The Marin County Planning Commission told them the same thing.

The Seminary Tomorrow group told them the same thing.

The Strawberry community told them the same thing.

This has to stop and the “buck stops” with the Board of Supervisors. **I ask the Board to make this clear to the applicant. Marin needs housing, not a commuter school** that no one else wants and that creates myriad negative ripple consequences for Strawberry and Marin.

Robin Fies

From: No-Reply
Sent: Sunday, January 25, 2026 3:30 PM
To: EnvPlanning
Subject: Re: P1490/North Coast Land Holdings EIR [SENT FROM A PUBLIC FORM]

Contact Us

Email To: EnvPlanning@MarinCounty.gov

Hosted Page: <https://www.marincounty.gov/departments/cda/planning/environmental-planning/current-ceqa-projects/north-coast-land-holdings-llc-environmental-impact-report/north-coast-noa-final-eir>

To: Environmental Planning General Contact

From: Penny Crow

Sender's Email Address: pennyec10@gmail.com

Subject: P1490/North Coast Land Holdings EIR

Message: Based on my review of this draft, I have chosen to focus on the deficiency of the aesthetics, as per the revisions.
Marin County Development Code-22.26.040 Landscaping Objectives and 22.42.010-Purpose of Chapter Pg. 4-4: Housing is proposed on the sides of Chapel Hill. If, in the Chapel Hill pre-construction period, it becomes necessary to relocate these structures, due to impacting the monarch butterfly, there is no mention of where they would be relocated. It simply states "Relocated to any other planning area". This is not acceptable in a project of this size and with the input of so many experts. It needs to be specifically stated where this housing would be built and it's impact on the the rest of the proposed project. Would the new location(s) result in fewer story structures, with fewer apartments, thus necessitating yet another apartment building? How might this change affect the roads and paths being created on the property? How would this affect the landscaping, planned views, etc? This needs to be clearly stated at the outset.

DES-4.c, Pg. 4-40 Regulate Mass and Scale:

The standard mitigation is trees! I don't believe "trees" are the singular answer. What happens if there is a drought, or insect infestation, for example, that causes the trees to die? The uppermost height of the care facility is 26.75 ft higher than the highest elevation of the Dormitory Hill peak line. The mitigation states that the trees will eventually "reduce the

visibility and further disguise the bulk of the structure visually". Admittedly the building has "bulk". Perhaps the building is too big? This section also mentions the 3 6-story apartment buildings. 6 story buildings are inconsistent with Strawberry, as one can see by the height of the existing apartment buildings. The height of these buildings need to be reduced by, at least 2 stories, or possibly 3. With the number of power failures in Strawberry, often lasting days, people should not have to rely on elevators (assuming there will be elevators) to get them in and out of their apartments.

2026-01-25 02:38PM -0800

IP: 2600:1700:a700:8d30:c459:ae34:9627:5049

Robin Fies

From: Riley Hurd <rhurd@rflawllp.com>
Sent: Monday, January 26, 2026 3:20 PM
To: EnvPlanning
Cc: Michelle Levenson
Subject: Comments on final Seminary EIR
Attachments: Ltr - SNA Final EIR comments - 1.26.26.pdf

Importance: High

Hello,

Attached please find our comments on the final Seminary EIR. If you could confirm receipt, it would be much appreciated. Thank you.

Riley F. Hurd III, Esq.
RAGGHIANI | FREITAS LLP
1101 5th Avenue, Suite 100
San Rafael, CA 94901
Tel: 415.453.9433 ext. 126
Fax: 415.453.8269
Email: rhurd@rflawllp.com
Website: <http://www.rflawllp.com/>

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Ragghianti|Freitas LLP

Attorneys at Law

1101 5th Avenue, Suite 100
San Rafael, CA 94901
telephone 415.453.9433
facsimile 415.453.8269
www.rflawllp.com

Riley F. Hurd III
rhurd@rflawllp.com

January 26, 2026

Via E-Mail Only

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

**Re: Final Environmental Impact Report for the North Coast Land Holdings
Project on the former Golden Gate Baptist Seminary Property**

Dear Ms. Levenson:

Our office continues to represent the Seminary Neighborhood Association in connection with North Coast Land Holdings' proposal to redevelop the old Seminary site. This letter transmits our comments regarding the Final EIR for the project. The legal standard for a Final EIR response to comments is "a good faith, reasoned analysis that specifically addresses the significant environmental issues raised by reviewers." Responses must demonstrate a genuine, analytical effort to engage with the comment rather than just providing conclusory statements. This legal standard has not been met here.

The responses in the Final EIR primarily consist of argumentative and/or dismissive replies to genuine, fact-based, comments from both the public and experts alike. This pattern demonstrates what appeared to be an extreme bias towards defending the project, as opposed to the good-faith dialogue contemplated by the CEQA process. The Final EIR fails to recognize new significant and unavoidable impacts brought up in the comments, contains illegal deferred mitigations, and was not recirculated for comment as required by law. **For these reasons, the Final EIR should not be certified.**

I. COMMENTS

The Seminary Neighborhood Association hereby reasserts all of the comments on the Draft EIR contained in the letter from this office dated September 16, 2024, inclusive of all exhibits thereto.



In addition to our previous comments, the following comments are also submitted on FEIR:

1. PM2.5 Post-Mitigation Calculation Is Missing

Dispersion modeling found the project would increase annual average PM2.5 concentration by 2.67 $\mu\text{g}/\text{m}^3$, which exceeds BAAQMD's threshold of 0.3 $\mu\text{g}/\text{m}^3$ by nearly nine times. The EIR claims Tier 4 engines achieve an 88% reduction, but that figure applies to diesel exhaust cancer risk, not PM2.5 concentration, which includes fugitive dust from grading and earthwork that Tier 4 engines do not address. No post-mitigation PM2.5 calculation appears anywhere.

Sources: Final EIR pp. 120, 582; Draft EIR pp. 156, 170; CEQA Guidelines §15126.2, §15126.4

2. Road Widening Impacts Were Not Analyzed

The EIR requires road widening as a mitigation measure – expanding roads from their current 20-28 feet to 36-40 feet minimum. This represents an additional 12-20 feet of width across the internal road network. The document contains no analysis of the environmental implications of this physical change.

Road widening of this magnitude involves tree removal, additional grading and earthwork, and thousands of additional square feet of impervious surface affecting stormwater runoff. A commenter raised this exact issue during public review, noting that "road widening could have secondary environmental impacts." The County's response clarified which roads would be widened but did not analyze the impacts. CEQA Guidelines Section 15126.4(a)(1)(D) requires that when a mitigation measure causes environmental effects, those effects must be discussed.

Sources: Draft EIR pp. 426-427; Final EIR p. 105 (Response O3-9); Marin County Code §24.04.110; CEQA Guidelines §15126.4(a)(1)(D)

3. Retaining Wall Impacts Were Not Evaluated

The project description assumes "unretained slopes," but the geology mitigation measure explicitly identifies retaining walls as a "typical" remedy for slope instability. These walls could reach 30 feet in height. A vertical retaining wall of this scale presents fundamentally different visual and biological impacts than a graded slope. The EIR's visual and biological assessments were based on graded slopes. Retaining walls are identified as a reasonably foreseeable outcome, yet their impacts are not analyzed anywhere in the document.



Sources: Draft EIR pp. 259, 262-263; CEQA Guidelines §15126.4(a)(1)(D)

4. Carbon Offsets Were Incorrectly Deemed Infeasible

The EIR concludes that carbon offsets are "administratively infeasible" because Marin County lacks its own offset program. CEQA Guidelines Section 15126.4(c) explicitly lists "off-site measures, including offsets" as a valid way to mitigate greenhouse gas emissions. The EIR does not claim offsets are ineffective or unavailable—only that the County hasn't created its own program to administer them. That is not infeasibility; that is an administrative choice. The project's GHG impact is classified as Significant and Unavoidable, yet a CEQA-endorsed mitigation measure is being dismissed because of the County's administrative choices.

Sources: Draft EIR p. 279; CEQA Guidelines §15126.4(c)

5. VMT Mitigation Lacks Enforceable Standards

The original draft specified that the TDM program "shall attempt to achieve" a 39% reduction. The revised measure replaced this with "achieve the maximum feasible trip reduction." Neither formulation can be enforced—there is no way to verify compliance with an "attempt" or to measure "maximum feasible." The revision removed the specific 39% target while retaining unmeasurable language. The listed TDM strategies use "may include" phrasing, making them discretionary rather than mandatory. CEQA Guidelines Section 15126.4(a)(2) requires mitigation to be "fully enforceable through permit conditions, agreements, or other measures." This measure is not. 1. The EIR proposes no mitigation for the campus service population of 1,240 students and support personnel, estimating that the VMT per capita exactly equals the CEQA guidelines of a 30% reduction. There is no after-the-fact evaluation that this VMT will be met. Considering the 10-fold increase in service population and impact that will have on total VMT, the County should require the campus VMT per service population be assessed annually after the project is in place and require the project applicant to meet the CEQA guidelines.

Sources: Draft EIR p. 424; Final EIR pp. 70-71, 563-564; CEQA Guidelines §15126.4(a)(2)



6. Loss of Sensitive Natural Communities Was Incorrectly Found Less Than Significant

The EIR finds that permanent loss of 16.4 acres of needle grass-melic grass grassland—a state-ranked "Vulnerable" (S3) natural community at moderate risk of extirpation—is "Less Than Significant." The EIR's own Table 3.4-3 confirms the S3 ranking. The basis for this determination is that similar habitat exists in nearby preserves.

This reasoning does not satisfy CEQA. The incremental loss doctrine requires analysis of the project's specific contribution to the statewide decline of a vulnerable community, not merely whether some habitat remains elsewhere. An S3 ranking means the community is already at risk; the loss of 16 additional acres contributes to that risk regardless of what exists in Golden Gate National Recreation Area or Ring Mountain Preserve. The EIR proposes no compensatory mitigation—no restoration, no conservation easements, no off-site protection—for a 16-acre loss of a state-ranked vulnerable community.

Sources: Draft EIR pp. 203, 209, 218-219; Final EIR pp. 145-146; CEQA Guidelines §15065(a)(1)

7. The Evacuation Analysis Uses Incorrect Methodology

The EIR concludes that Seminary Drive and East Strawberry Drive can accommodate 7,600 vehicles per hour during an evacuation. This figure derives from "saturation flow rates" designed for ideal signalized intersections with 12-foot lanes, no grades, and calm drivers proceeding methodically under normal conditions. Seminary Drive is a narrow residential street with stop signs, driveways, parked cars, and families fleeing a wildfire.

Standard traffic engineering practice requires applying reduction factors for lane width, stop-controlled intersections, unfamiliar drivers, and emergency conditions. The EIR does not apply these factors. The stated 7,600 vehicles per hour capacity is dramatically overstated and the actual evacuation capacity of these routes remains unknown.

Sources: Draft EIR pp. 429-431; Final EIR pp. 112, 343, 391-394; CEQA Guidelines §15151

8. Water Supply Assessment Requirements Were Not Evaluated

The EIR concludes that a formal Water Supply Assessment is not required because the project has 324 residential units, below the 500-unit threshold. The project also



includes an academic campus and care facility, bringing total water demand to 129.8 acre-feet per year – roughly 42 million gallons annually. Water Code Section 10912(a)(7) includes a catch-all provision requiring assessment for any project demanding water equivalent to a 500-unit project. The EIR contains no calculation comparing the project's total demand to this equivalence threshold.

Sources: Draft EIR p. 448; California Water Code §10912(a)(7)

9. Downstream Infrastructure Impacts Were Not Analyzed

Neighbors raised concerns about a collapsed downstream stormwater pipe. The County's response focused on private property ownership and the absence of any duty to repair private infrastructure. CEQA's concern is with indirect physical impacts—specifically, whether increased stormwater flow could exacerbate existing infrastructure failures. The ownership of the pipe does not determine whether the project's runoff affects it. The EIR analyzes whether runoff will overflow during storms, but not whether sustained flow will further damage an already-failing pipe.

Sources: Draft EIR pp. 321-322; Final EIR pp. 366-367; CEQA Guidelines §15126.2

10. Assumptions regarding on-campus living, traffic and other activities are unrealistic.

Mitigation Measure 3.14-2b would require a permanent dedication of a portion of the project's market rate residential units, within the limits of feasibility (*italics added*), to campus-affiliated residents (i.e., students, staff, and/or faculty) as a condition of approval. This measure is the most likely to be effective at reducing VMT for the project. Not only does this sentence use the qualifier "limits of feasibility"...but it also relies on successfully prioritizing on-campus residential living to ensure that significant amounts traffic and other activities remain within the perimeter of the development. All of this is highly speculative and unlikely. The best way to mitigate this issue would presumably be to strictly limit the student and staff count...or replace the school with additional housing. This is a classic example of illegal, unenforceable, deferred mitigation.

11. Hydrology.

The FEIR erroneously indicates the public comments related to hydrology did not identify any significant environmental impacts. The FEIR's does not legally address "whether the 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."



- a. The FEIR wrongly indicates this was covered in section 3.9.6 of the draft EIR. It failed consider the impact on human health. The EIR admits there will be a significant traffic increase that will not be mitigated. With additional traffic caused by the project and more frequent flooding and closure of the primary evacuation route from Strawberry, traffic will clog all remaining access routes. This will significantly increase fire, other emergency and ambulance response times. This presents a significant adverse impact on human health, is a direct cause of the project, and should have been addressed in the EIR. The County's assertion that this was addressed by section 3.9.6 of the draft EIR is simply wrong. The draft EIR's summary conclusion in that section shows that it ignores the impact on human health: "Although the project does not exacerbate the hazard, increases in traffic exposure to the existing hazard would occur with construction of the project. The project would not exacerbate any existing and or projected damage to the environment associated with future sea level rise and peak high tides. Therefore, the impact would be less than significant."

12. **Staffing.** The staffing model used for school lacks factual basis and does not assess true impact by grossly undercounting staff members.

- b. The EIR postulates a faculty/staff population of only 253 individuals. That is a 25% employee-to-student ratio, which is way below industry standards. Virtually all other tertiary schools in the Bay Area have (non-student) employee-to-student ratios of between 40 - 112%.*

- *St Mary's College Moraga 62%
- *Stanford University 112%
- *University of California 89%
- *University of San Francisco 40%
- *Dominican University 50-95% (per CA Form 990)
- *California College of Law 40%
- *University of Santa Clara 64%

13. **Commute Impacts.** The commute impacts of construction workers lacks credible analysis in the FEIR. Anyone living in Marin can attest that, overwhelmingly, construction workers likely to be involved in this project will come from outside Marin. Sonoma, Napa, Alameda, Contra Costa and Solano are where these workers will be drawn from. Few will be from Marin. The "average" Marin commute may be 10.3 miles as stated in the EIR, but that is frankly irrelevant to



those likely to work on this project. Further, to complete this project in only four years with 10-160 workers significantly underestimates the time frame. Where did the Developer arrive at a four-year estimate? Why has the County accepted it?

- a. Commuting Students Are Functionally Excluded From Public Services Analysis. The EIR repeatedly asserts that:
- b. Most commuting students' demand for public services is "affiliated with where they live" and that their on-site presence is "transitory." Therefore, they do not warrant analysis beyond traffic impacts.
- c. This reasoning is illegally used to exclude up to ~900 commuting students from fire, police, EMS, parks, and emergency response demand calculations.
- d. CEQA evaluates service demand where impacts occur, not where people sleep. Emergency calls, policing needs, medical incidents, and evacuations occur where people are physically present, even if temporarily. The EIR acknowledges 1,000-student enrollment elsewhere, yet omits them from public services modeling except traffic. **Courts have rejected "transitory use" arguments when a use meaningfully increases on-site population during peak hours.**

14. **Emergency Services.** Fire and Emergency Services: No Quantified Response Time Analysis. Despite repeated requests, the EIR does not provide:

- Baseline fire/EMS response times
- Projected future response times
- Mitigated response times
- Comparison to SMFD response standards

Instead, it relies on qualitative consultation and infrastructure fixes (signal preemption / roundabout). CEQA requires substantial evidence, not assurances. Multiple commenters (including fire professionals) explicitly requested quantified response modeling. The mitigation is illegally adopted without demonstrating effectiveness. The EIR admits additional EMS staffing may be required, but dismisses it as non-significant because no new station is planned. This is illegal.

Emergency personnel staffing impacts are improperly excluded from numerous significance determinations. Ongoing staffing shortages can degrade service levels (response times, coverage, etc.). The EIR does not analyze whether staffing increases are feasible, funded, or timely. This is a frequent CEQA litigation vulnerability, especially when agencies acknowledge service strain but decline mitigation.



15. No Mention of Blind, Confined, Narrow Curves in the Lower Divided Section of East Strawberry Drive.

- a. Appendix D – Memorandum has a section titled “Observations of Existing Intersection Issues and Potential Measures.” Item 7 “300 block of E. Strawberry Drive” (on page 16) it omits any mention of the two blind curves from #325 - #235 as one travels north on E. Strawberry Drive. These blind curves were raised in public comments written in response to the DEIR by Terrill Graham. Moving cars and bicycles are unaware of pedestrians or cars entering or exiting garages or driveways until they are on top of them. Many of these houses were originally built in the 1950s when the lower section was designed for approach to garages and driveways from the north. It takes longer to enter and exit these for approach from the south. The roadway here is very narrow and trapped by the bank to the west and the parked cars and houses to the east.
- b. Item 7 (on page 16) mentions that there have been no reported fatal or injury collisions in this area from 2019 – 2024. However, we have observed during the aftermath of several incidents: smashed fences, broken mailboxes, and cars stranded on the center divide.

16. No Mention of Limited Access to Herring Drive/East Strawberry Drive Entrance.

In the past, access to and from the Seminary from Herring Drive was limited to certain hours or certain days

- a. Appendix C – Updated TIS Documents assesses “Vehicle Miles Traveled.” As stated on page 39: “IMPACT TRAN-1: Implementation of the proposed project would generate an increase in vehicle miles that may have a significant impact on the environment. And on page 40: “The existing plus Project Average Home-Based VMT per capita is estimated to be 19.1, which is 39 percent higher than the regional VMT threshold of 13.7.” More traffic will mean more accidents.
- b. In Appendix B – Updated LOS Assessment Memo Figure 2, Project Trip Distribution, indicates that 13% of the current traffic enters/exits the Seminary via Herring Drive. This statistic, although interesting, is meaningless. If total traffic volume goes up, so will the traffic on East Strawberry Drive. For example, page 9 in Appendix B contains Table 3: Project Trip Generation. It lists the current “Academic Campus” having 100 students and generating 156 daily trips. At 13% use of Herring Drive, that is 20.2 daily trips. The proposed “Academic Campus” would have 1000 students generating 1560 daily trips. At 13% use of Herring Drive, that is



202 per day, a tremendous increase (especially for a school that is currently undefined.)

17. **Cumulative Impacts.** The cumulative impacts of other approved housing projects have not been properly analyzed. (Although there are additional projects that have been added as revisions to the Final EIR, other projects are missing.)
18. **Construction Noise.** Deferred Mitigation for Construction Noise Impacts - The FEIR admits that construction noise will exceed County thresholds, yet the proposed mitigations are insufficient for the Seminary area's topography:
 - a. Line-of-Sight Failures: Standard 8-foot sound barriers are ineffective for hillside neighbors. Noise from heavy machinery on the project site will travel unimpeded to the second stories and elevated decks of homes on E. Bel Air Ave and the surrounding ridges.
 - b. Deferred Mitigation: The EIR defers the specifics of the "Noise Control Plan" to a future date. Under CEQA, the public has a right to see the specific, enforceable performance standards of these noise mitigations before the project is approved.
 - c. Saturday construction must not be allowed.
19. **Evacuation.** The impacts on emergency evacuation were not adequately analyzed. The number of senior residents, and the number of students and school staff were not properly included in the analysis. Inadequacy of Mitigation for Emergency Egress (Safety). The FEIR relies on VMT (Vehicle Miles Traveled) reduction to address transportation, which is an inadequate proxy for life-safety during a wildfire evacuation.
 - a. Physical Bottlenecks: The mitigation measures do not address the physical reality that residents from Ricardo Lane, E. Bel Air Ave, and Great Circle Drive must all converge onto a single, narrow segment of Seminary Drive to reach Tiburon Blvd.
 - b. The Senior Care Constraint: The inclusion of a 150-unit senior care facility requires specialized medical evacuation. The FEIR fails to provide a dedicated emergency route, meaning ambulances will be forced to compete with hundreds of residents fleeing on the same two-lane roads.
 - c. Underestimated Load: By failing to model the evacuation of the 1,000-student population allowed under the 1953 CUP, the EIR underestimates the "worst-case" clearing time for the peninsula.



20. **Erroneous Energy Data:** Table 3.5-1 reports operational gasoline consumption of 183+ million gallons – approximately 1.8 times Marin County's entire annual fuel consumption. Caltrans flagged this error during the comment period. It was not corrected. (Draft EIR p. 233; CEQA Guidelines §15151)
21. **Construction Vibration:** The EIR adopts 80 VdB as its significance threshold, calculates impacts of 101 VdB – 21 logarithmic units above threshold – then concludes "Less Than Significant" based on daytime construction hours. An EIR cannot establish a threshold, exceed it by 26%, and then dismiss it. Also the physical impact exists regardless of time of day. (Draft EIR pp. 359, 364-365; CEQA Guidelines §15064(d), §15064(e))
22. **Reduced Development Alternative:** A 234-unit alternative (90 fewer units) was rejected as "legally infeasible" due to SB 330. SB 330 limits the County's authority to mandate reductions – it does not preclude CEQA disclosure of alternatives the applicant could voluntarily adopt. The project has Significant and Unavoidable VMT impacts; this alternative was excluded from analysis without valid basis. (Draft EIR p. 508; Final EIR pp. 32-39; CEQA Guidelines §15126.6(c), §15364)
23. **Speculative No Project Baseline:** The No Project alternative assumes enrollment could increase from 100 to 1,000 students based on a 1953 permit, while the applicant's own materials indicate the campus requires renovation to remain viable. This inflates the baseline and obscures the proposed project's incremental impacts. (Draft EIR p. 510; CEQA Guidelines §15126.6(e)(2))
24. **Construction GHG Emissions:** The EIR acknowledges 6,643 MTCO_{2e} of construction emissions but proposes no construction-specific mitigation. Feasible measures exist, including renewable diesel, electric power, and idling limits. (Draft EIR p. 276; CEQA Guidelines §15126.4(a)(1))
25. **Deferred Hydrology Analysis:** The Hydrology Study omits 0.7 acres of impervious surface – a 13% increase. Deferring analysis to future "code compliance" without specific performance standards violates CEQA's deferred mitigation requirements. (Draft EIR p. 322; Final EIR pp. 364-367; CEQA



Guidelines §15126.4)

26. **Hydrologic Design Compliance:** Compliance with Municipal Code Section 24.04.520's 100-year design storm requirements cannot be demonstrated when the hydrology study does not model the actual project configuration. (Draft EIR p. 320; Marin County Code §24.04.520)
27. **GHG Performance Standards:** "Maximum extent feasible" describes required effort rather than required outcome. CEQA requires specific performance standards so compliance can be verified. (Draft EIR p. 278; CEQA Guidelines §15126.4(a)(1)(B))
28. **Monarch Butterfly Habitat:** Mitigation prevents removal of roost trees October-March but permits removal April-September with no compensatory habitat requirement within the development footprint. (Draft EIR p. 208; CEQA Guidelines §15126.4(a)(1))
29. **Short-Term Visual Impacts:** Visual simulations depict conditions five years post-construction when mitigation trees have matured. The analysis does not address visual impacts during years 0-5 while sky-lining remains unscreened. (Draft EIR pp. 131, 151; CEQA Guidelines §15126.2(a))
30. **Geographic Scope for Cumulative Hazards:** Cumulative construction analysis is limited to the Strawberry Peninsula, though Seminary Drive and US 101 access routes serve broader areas where concurrent construction projects would share ingress/egress. (Draft EIR p. 470; CEQA Guidelines §15130(b)(3))
31. **Campus Event Noise:** Event noise analysis assumes future events will match historical patterns authorized under the 1953 CUP, rather than measuring actual current noise levels. No quantitative modeling of proposed events against measured ambient levels is provided. (Draft EIR p. 367; CEQA Guidelines §15126.2, §15384)



32. Historical Resources Standards: Mitigation allows bypassing preservation for "important structures" or "exorbitant expenditures"—terms that differ from CEQA's defined "feasibility" standard. (Draft EIR p. 187; CEQA Guidelines §15126.4(b)(3), §15364)

33. Glare Mitigation Threshold: The 0.6 albedo coefficient for glare mitigation lacks technical justification. Albedo measures total reflectance rather than directional glare—a 0.6 albedo surface can still be highly specular depending on surface finish. (Draft EIR p. 153; CEQA Guidelines §15126.4(a)(1))

34. The following revisions indicate new unaddressed impacts or other legally actionable defects within the FEIR:

- a. Fossils were found on site: Page 4-24: After saying in the Draft EIR that the Franciscan Complex found at the project would not contain identifiable fossils, the revised Final EIR contradicts that as follows:

“...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.)”

- b. Affordable housing destroyed by the project needs to be replaced....and then doesn't need to be replaced

See revisions on p. 4-27: Language from Draft EIR said the “project is not eligible for density bonus...” and then the revised language of the Final EIR says “would not...”

See immediately following changed language the unsupported statement that “Approximately 30% of the proposed project housing units would be occupied by the student, staff....etc.” Where is this condition?

Page 4-99 of Revisions changes the existing number of housing units at the Seminary from 139 to 132. [Where did 7 units disappear to?]

- c. FEIR Revision discloses the project as proposed would be “noticeably visible” extends 26.75 feet too high above ridgeline. Pages, 4-39 and 4-41.



- d. Revisions disclose that “Emissions of criteria pollutants” would be significantly higher and “exceed thresholds of significance.” Page 4-46.
- e. Revisions add new language re: endangered bird species and peculiar rationale at Page 4-53. New language re: Bald Eagle, California black rail, and Californian Ridgeway’s rail. Strange rationale is also new language.: “...because once construction occurs, these currently unmaintained areas would likely only attract nesting bird specials that are more tolerant of human disturbance.”
- f. High evacuation scores are strangely minimized with unsubstantiated assertion that E. Strawberry Drive will be a “secondary option for evacuation.” Page 4-71.
- g. Page 4-86: New language which says that failure to do parking demand reduction, and road widening will result in campus enrollment being limited to 50% or less. Where is this mitigation condition?
- h. Noise from deliveries is not analyzed for the impact of increased frequency

Page 4-95: There is new language which argues that future noise levels from deliveries will be similar to current noise levels and therefore “would not result in a substantial increase in noise.” This fails to analyze the impacts of the increase in the number of deliveries created by a school with more students, the creation of senior living facilities, etc.

- i. The revisions made to “Alternative 4” undermine the impact analyses that were done for the Draft EIR and remain unchanged in the Final EIR

Page 4-137: Suspicious new language is introduced to create the possibility that Alternative 4 will not necessarily relocate the Chapel Hill units to a lower elevation. Alternative 4 was primarily about relocating the Chapel Hill units. New language creates a huge loophole by adding the language: “.....the proposed residential units on Chapel Hill would be located to lower elevations within the project site to reduce local ridgeline visual impacts in lieu of or in conjunction with recommended screen views of Chapel Hill units with vegetation.” (The underlined words are new.)



II. RECIRCULATION IS REQUIRED

If significant new information is added to an EIR after notice of public review has been given, but before final certification of the EIR, the lead agency must issue a new notice and recirculate the EIR for comments and consultation. (Pub Res C 21092.1; 14 Cal Code Regs 15088.5; *Vineyard Area Citizens for Responsible Growth v City of Rancho Cordova* (2007) 40 C4th 412, 447.) The CEQA Guidelines specifically state that changes in a project's description, **or the provision of significant new information**, require recirculation of a draft EIR. (14 Cal Code Regs 15088.5(a).)

"Significant new information" requiring recirculation includes:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A 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.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Here, at least the first three of these criteria are met and recirculation is required. The purpose of recirculation is to give the public and other agencies an opportunity to evaluate the new data and any resulting conclusions. (*Spring Valley Lake Ass'n v City of Victorville* (2016) 248 CA4th 91, 108.)

The detailed local and expert comments on the DEIR revealed that there are significant environmental impacts beyond those already acknowledged in the DEIR, that the impacts already identified are more severe, and that additional and different alternatives and mitigation measures need to be considered. The FEIR failed in multiple regards to address these new and different issues. Accordingly, recirculation was absolutely required.

III. CONCLUSION

The Strawberry community is willing to accept relatively sizable amounts of housing, a significant percentage of low-income units, a robust senior facility, and a tailored educational use. However, the decision to approve a project of this scale and lasting impact *must* be based on a thorough and accurate analysis of impacts. The entire purpose of CEQA is to arm decision-makers with an understanding of the impacts of their



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decision. At this time, the FEIR does not achieve this goal and would never withstand judicial scrutiny.

Thank you.

Very Truly Yours,

A handwritten signature in blue ink that reads "Riley F. Hurd III". The signature is written in a cursive, flowing style.

Riley F. Hurd III

CC: Seminary Neighborhood Association
Supervisor Moulton-Peters

TO: Rachel Reid, Planning Manager, Marin County & Supervisor Stephanie Moulton-Peters

RE: PUBLIC COMMENT ON FINAL EIR FOR P1490 / North Coast Land Holdings Project (Former Golden Gate Baptist Seminary)

DATE: January 26, 2026

RE: Strawberry Sidewalk Infrastructure Funding as Mitigation for Transportation Impacts

Dear Ms. Reid.

The TIS acknowledges that residents and students will need safe pedestrian and bicycle connections to transit, Recreation (SRD) and schools (Strawberry Point Elementary). The current infrastructure cannot safely accommodate these trips.

This is the chance to for Marin County to upgrade woefully inadequate Strawberry pedestrian infrastructure as a key mitigation for the Transportation Impact.

Marin County should require that the Developer provide funding for the following Strawberry specific infrastructure improvements to mitigate transportation impacts:

- 1. Close East Strawberry Drive Sidewalk Gaps (0.3 miles) (Not in Appendix D)**
 - Today, it is impossible for an individual to walk from Seminary to Strawberry Point Elementary School on a continuous sidewalk (including crosswalks), a fact in the FEIR.
 - A child who lives at the new Seminary housing should not be required to walk in the dangerous, (now busier) roadway for 400+ meters every time they walk to school.
 - Proposed: Construction of continuous sidewalk and crosswalks from Strawberry Point Elementary School to the proposed Seminary Development should be required as approval condition.

2. Appendix D Safety Improvements: Marin County should make the Appendix D traffic safety improvements a binding condition of project approval, not a voluntary enhancement.

Marin County has Legal and Regulatory Basis for Requiring Funding for these changes per Marin County Policy TR-2.2 which requires: "Where appropriate, require new development to provide trails or roadways and ...pedestrian facilities. **In-lieu fees may be accepted if warranted in certain cases.**"

I urge the County to impose this funding requirement for the Strawberry community pedestrian infrastructure improvements as a condition of Seminary project approval.

Respectfully submitted,

Alexander and Stacey Johnson
Strawberry Resident

TO: Rachel Reid, Environmental Planning Manager, Marin County & Supervisor Stephanie Moulton-Peters
DATE: Monday, January 26, 2026
RE: PUBLIC COMMENT ON FINAL EIR FOR P1490 - Construction Hour Restrictions as Mitigation for Noise Impacts

The Final Seminary North Coast EIR identifies construction noise as a significant, unavoidable impact. Construction hours as proposed in the EIR are insufficient. We don't want weekend construction noise.

The Final EIR plan allows full construction and noise on Saturdays (9 AM-5 PM)— a noise level that exceeds all nearby comparable incorporated town standards.

Allowing this on Saturdays is unacceptable.

The Final EIR acknowledges construction at the seminary site could on all construction days could reach 86 dBA— equivalent to a commercial jet at 1,000 feet or a gas leaf blower inside your living room. The seminary sits in a geologic "bowl" that amplifies and will carry Seminary construction noise across the valley to Tiburon, Mill Valley, Sausalito, Marin City, and Tamalpais Valley.

We, residents of Strawberry, Mill Valley, Tiburon, Sausalito and neighboring communities throughout the acoustic impact zone, request that the County impose Mill Valley-equivalent construction hour restrictions as a mandatory project mitigation measure to substantially reduce noise.

The Seminary site is located in Unincorporated Marin and does not have ANY town or village sound restrictions beyond county restrictions - it is the responsibility of Marin County to add these mitigations.

Seminary Project – Currently Allowable in EIR As Proposed

Weekdays: 8:00 a.m. – 6:00 p.m. Full Noise Allowed, Unrestricted Heavy Equipment
Saturdays: 9:00 a.m. – 5:00 p.m. Full Noise Allowed, Unrestricted Heavy Equipment

Seminary Project – Requested Standard in this Letter

Weekdays: 8:00 a.m. – 5:00 p.m. (one hour earlier finish of Unrestricted Heavy Equipment)
Saturdays: No construction permitted (Mill Valley's standard).

Adjacent incorporated towns to the Strawberry Seminary site demonstrate that stricter construction and noise hours are reasonable and enforceable:

Mill Valley allows:

Weekdays: 8:00 a.m. – 5:00 p.m.
Saturdays: No construction permitted at all.

Tiburon allows:

Weekdays: 7:00 a.m. – 5:00 p.m.
Saturdays: Construction activity allowed 9:30 a.m. – 4:00 p.m. ONLY if NO construction noise is

audible at the property line during these hours.

Proposed Mitigation Measure: Mill Valley-Equivalent Construction Hours

We implore the County impose these restrictions as conditions of approval:

Monday-Friday: 8:00 AM - 5:00 PM

Saturday: No construction permitted

This mitigation is appropriate for because unlike typical development projects, the Seminary site is in a highly residential area, will continue for years, and has valley topography and is water-fronted site creating sound across the region and into nearby villages and towns.

Under Marin County Code: Chapter 22.64 and others grants the Board of Supervisors authority to impose objective conditions of approval broadly applicable to development.

The County can negotiate binding development agreements that include construction hour restrictions more stringent than county minimums, as it has done in previous unincorporated Marin area projects. Marin County also routinely imposes stricter-than-code requirements in unincorporated areas such as Wildland-Urban Interface (WUI) Standards in 2025. Marin County has clear legal authority and precedent for imposing these construction hour restrictions.

We implore to you implement these stricter noise standards as we have proposed as a formal Marin County condition of approval for the North Coast Seminary project.

Thank you.

Signed

Alexander Johnson	Mill Valley	CA	90049	United States	1/24/2026
Philip Norris	Mill Valley	CA	94941	United States	1/24/2026
Peter Teese	Mill Valley	CA	94941	United States	1/25/2026
Sung Chun	Mill Valley	CA	94941	United States	1/25/2026
Sarah Bequette	Mill Valley	CA	94941	United States	1/25/2026
Atefeh Bonakdar	Greenbrae	CA	94904	United States	1/25/2026
Elizabeth DeLoach	Tiburon	CA	94920	United States	1/25/2026

Elliott Deloach	Tiburon	CA	94920	United States	1/26/2026
Ashkan Mohammad	Novato		94947	United States	1/26/2026
Paul Kayfetz	Mill Valley	CA	94941	United States	1/26/2026
Azar Eslampour	Concord	CA	94521	United States	1/26/2026
Evelyn nichols	Mill Valley	CA	94941	United States	1/26/2026
Lia Rabinowitz	Mill Valley	CA	94941	United States	1/26/2026
Ted Eckersdorff	Mill Valley	CA	94941	United States	1/26/2026

**ROBERT W. HENDRY COMMENTS REGARDING GEOLOGY TO
THE PLANNING COMMISSION REGARDING NCLH EIR STUDY – MAR 2026**

Planning Commissioners,

Thank you for your time for allowing me to address you regarding the serious problem with soil erosion in the proposed Seminary area. As you may not be aware, considerable soil erosion has been taking place all around the Seminary property without the proposed development and its consequent construction. Many of us in the area has spent considerable sums in shoring up the hillside of our homes due to the natural erosion taking place.

Again, the final EIR states, the level of construction being proposed poses a significant risk on the community especially on the slopes surrounding the property. It concludes again that mitigation requires the preparation of design-level geotechnical engineering reports prior to the issuance of a project permit by the Marin County Department of Public Works.

Specifically, it states that a geotechnical consultant to perform supplemental exploration, laboratory testing, and engineering analyses to define the slope stability and landslide avoidance, improvement, or repair required in the design of project features in each catalogued area of instability.

Examples of repair and/or improvement of landslides may include one of a combination of the following methods, or other engineering strategies defined during geotechnical engineering design:

- excavation of unstable material, installation of subsurface drainage and construction of a compacted earth fill buttress;
- design and construction of retaining surfaces (above and below ground pile walls and shear keys);
- de-watering with subsurface drainage;
- removal of the entire unstable landslide mass; or
- other methods as deemed acceptable to Marin County.

Given the extent of previous geotechnical reports and this level of concern expressed in the EIR, is wise to go forward with this level of development.

Given the notices projected by Geotechnical experts, the County and the developer will face considerable legal claims if the work is found to be substandard to any degree. Given the obvious danger to the Community, please do not let this project as it is proposed go forward. More attention needs to be given to the size of the project and its geological impact.

ATTACHMENT - 2

From: [David Morgenthaler](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#); michaelgallagher.office@gmail.com
Subject: Deep concern re: rising danger from 400+% ^ in daily traffic from Seminary Development
Date: Wednesday, February 25, 2026 8:01:09 AM
Attachments: [Ricardo westbounduphill toward Reed.png](#)

You don't often get email from dtmorg3@gmail.com. [Learn why this is important](#)

Dear Planning Commission, Ms. Levenson, Ms. Moulton-Peters, and Mr. Gallagher,

My name is David Morgenthaler and I live at 223 Meda Lane, in the Strawberry neighborhood of Mill Valley. My family and I have lived here for nearly 5 years, and my two oldest kids are both in school here in Strawberry: one at SPES, and one at Le Petit Jardin on the Seminary campus.

I am broadly supportive of the state's efforts to build more housing. We've built far too little in the last 40-50 years, and we all must find a way to make room—in our communities and in our hearts—to allow more families to find a stable way of life here in California. I support the Seminary Development project broadly, and have often found myself wondering whether such a development might bring some welcome liveliness to central Strawberry.

However, the project and the EIR as it stands today is fundamentally flawed: proposed traffic mitigations and measures to protect pedestrians, cyclists, and motorists are so inadequate as to be utterly disqualifying on their own. Consequently, for the health and well-being of every Strawberry member, I *strongly* urge you to reject the EIR as it stands today.

Some context:

Our driveway is right on a blind curve with no sidewalks on either side... from the time we've moved here in 2021, I've been seeing local teens flying down Meda on ebikes, going faster than most of the motorists in the area—again, around a blind curve, often with cars parked on the inside edge. With cars parked on both sides of Meda, it is often not easy for two cars to pass each other without needing to give way. Even with traffic at levels it has been today, I felt compelled to identify these kids' parents, to warn them that it was just a matter of time before they went downhill at exactly the moment a car came up the hill, right in the cyclist's path.



4000-5000 vehicle trips through Strawberry WILL result in traffic diverting off E Strawberry Drive and Seminary onto Ricardo, Meda, and Richardson, all in the service of getting to Reed Blvd to use it as a cut-through to get to the seminary campus. Such a huge increase in traffic throughput will have a terrible impact on safety for all of us. In the < 10 minute walk from our home to Strawberry Point Elementary, we already face 3 blind curves: one going uphill on Meda, one on Reed heading toward Ricardo, and one transitioning from Ricardo Road to Ricardo Lane). Further, there are:

- basically no sidewalks around,
- frequently narrow roads,
- steep grades in every direction, and
- motorists routinely rolling right through stop signs (due to infrequent and generally lax traffic law enforcement), often going downhill, near an elementary school, all while hardly tapping the brakes.

The blind turn on Reed approaching Ricardo from the south is routinely made worse by cars parking on the inside of the turn, blocking the pedestrian thoroughfare such that one must walk directly into the path of oncoming traffic to get continue onward. Walking on the other side of the street doesn't solve the problem either, as there are generally even more cars parked on that side. See the photo for a visual aid.



This is to say nothing of the extremely steep grade on Ricardo... I've personally slipped and fallen from loose gravel on Ricardo heading downhill toward the northeast from Reed, and so have two of my kids. Further, at the transition to Ricardo Lane, stopping distance and visibility is so long and so obstructed that motorists routinely roll through the stop sign *just so they can see around the corner*.



Finally, it is my understanding that the Strawberry Neighborhood Association put together a "Strawberry Tomorrow" document some time ago that included a proposal for a major development that fell more in the range of 234 new units, rather than 337. Given that that proposal still found somewhere around 4,323 daily trips in Strawberry, already a huge increase over today, I would like to know why that proposal was not more thoroughly evaluated, and what is stopping it from going forward.

I put together a comprehensive list of my concerns, but #1 among them: the idea that our roads could *ever* safely support the proposed volume of traffic—even if one COULD put in sidewalks (which would be impossible without either condemning front yards or further restricting the roadway while making ready for a 3-5x increase in vehicle traffic)—is utterly out of touch with the reality of life on the ground here in Strawberry. Short of remodeling all of Strawberry around Pac Heights and Russian Hill, it is hard to imagine a scenario in which our topography and layout of parcels could support anything more than 2 times the flow of traffic we have today... without putting many people's lives—my wife and young children among them—at risk.

For these reasons and many, many more, I support the Seminary Development, but I implore you to reject the existing EIR until a safer, more measured proposal is put forward, with input from and dignity towards the community at large.

Thank you for your consideration,

Best regards,
David Morgenthaler
223 Meda Lane, Mill Valley CA 94941

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Comments for March 2, 2026 Planning Commission meeting
Date: Thursday, February 26, 2026 12:42:46 PM
Attachments: [RWH Comments to Planning Commission Final EIR Dec 2005.docx](#)

From: Bob Hendry <roberthendry@msn.com>
Sent: Tuesday, February 17, 2026 9:59 AM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Comments for March 2, 2026 Planning Commission meeting

You don't often get email from roberthendry@msn.com. [Learn why this is important](#)

From: Bob Hendry <roberthendry@msn.com>
Sent: Tuesday, February 17, 2026 9:43 AM
To: Michelle.Levinson@marincounty.org <Michelle.Levinson@marincounty.org>;
planningcommission@marincounty.org <planningcommission@marincounty.org>
Cc: derek.johnson@marincounty.org <derek.johnson@marincounty.org>;
smoultonpeters@marincounty.org <smoultonpeters@marincounty.org>
Subject: Comments for March 2, 2026 Planning Commission meeting

Michelle,

Please make sure my comments are received by the Planning Commission for its planned March 2, 2026 meeting.

Thank you,

Bob Hendry
58 Seminary Cove Drive

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: NCLH proposal
Date: Thursday, February 26, 2026 12:40:36 PM

From: Joe Sherer <joe@solarports.com>
Sent: Wednesday, February 25, 2026 12:00 PM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: NCLH proposal

You don't often get email from joe@solarports.com. [Learn why this is important](#)

Hi Michelle,

My name is Joe Sherer. I live at 115 Inez Place, Mill Valley in Strawberry and I am a daily pedestrian in this neighborhood. I am submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

Let me say upfront: As a career residential real estate developer, I am pro-housing. I understand Marin's obligations under state law and I support responsible development. This letter is not about stopping housing. It is about ensuring that infrastructure keeps pace with density.

I was head of the Strawberry Design Review Board for 10 years including holding numerous 300-person meetings with our community on the NCLH proposals. As a lifelong real estate developer I have never seen a worse proposal for any community. This project is devastatingly bad and not at all worth their false claim of increased affordable housing.

I worry about this constantly.

The developer will not identify what type of 1,000-student school it plans to operate. This matters enormously for traffic. A residential campus is very different from a commuter institution. The current EIR does not model the traffic from a commuter school because the developer will not disclose the plan. This is a blank check for an undefined use with potentially massive impacts.

The numbers speak for themselves. The seminary at peak operation generated about 1,600 daily trips. The current Olivet tenancy produces roughly 2,300. The proposed project would push that well beyond 4,300 daily trips — on the same narrow roads with no sidewalks. The EIR admits this impact is significant and unavoidable.

Another serious issue: the county's own 684-page Environmental Impact Report — paid for by the developer — identifies 13 significant environmental impacts, three of which cannot be mitigated: traffic, greenhouse gas emissions, and construction noise. When the developer's own analysis says the impacts cannot be fixed, that should give the Commission serious pause.

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, faculty, and staff. The educational use

was approved as a residential graduate seminary where students would live on campus. North Coast is asking the county to amend these restrictions so it can build market-rate housing and operate an undefined school. The community plan represents years of community input and democratic process. Overriding it to meet state housing quotas undermines the very concept of local planning.

I urge the Commission to condition any approval on meaningful safety infrastructure, and to demand answers about the undefined educational use.

Sincerely,

Joe Sherer
115 Inez Place, Mill Valley
Strawberry, Mill Valley

(415) 888-4000 office

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 12:41:01 PM

From: Diane Attersley <dattersley@gmail.com>
Sent: Wednesday, February 25, 2026 8:57 AM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Re: Public Comment — Seminary at Strawberry (P1490)

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Re: Public Comment — Seminary at Strawberry (P1490)

My name is Diane Attersley. I live at 224 Richardson Dr in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive, Richardson Dr — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

Richardson Drive is a narrow one-way street with no sidewalk and will be used as an access road for this development.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll
- The residents of Strawberry — and especially our children — deserve no less.

Thanks,
Diane Attersley
224 Richardson Dr
Strawberry, Mill Valley

Leslie Gardner
159 Great Circle Drive
Mill Valley, CA 94941

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Dear Members of the Planning Commission and Secretary Levenson,

My name is Leslie Gardner and I have lived in my home at 159 Great Circle Drive, Mill Valley 94941 for over 41 years. My home is in very close proximity to the former Seminary property at 201 Seminary Drive. In fact, I must drive on the one lane, Seminary Drive, winding road past the entrance to the project to get to my home.

I understand Marin County's housing obligations and I am not opposed to building responsible housing on the site now owned by North Coast Land Holdings LLC. What I am opposed to is the **scale of the project**, which includes:

- 337 rental properties with 70 designated as below market rate affordable housing
- a school that is undefined with 1,000 students and no guarantee that these students will be graduate students that live on campus
- a senior care center with 100 independent units and 50 assisted care units
- a day care facility and gym
- buildings at 6 stories, which is out of sync with the buildings in the area
- the 250 additional workers on the property

The scale of the project being proposed will result in **significant and dangerous traffic and will exceed the time frame identified to build the development.**

My primary objections to this project are as follows:

Traffic and safety: The EIR identifies traffic as a significant and unavoidable impact. The new development will exceed 5,000 daily trips on the one lane Seminary Drive. This by far, exceeds the county's threshold. When the Seminary was fully operational, there were approximately 1,600 daily vehicle trips. Additionally, Seminary traffic unloads onto Ricardo, a one lane narrow road which already gets congested with the current traffic. It cannot handle the number of cars that the project is expected to produce.

I spoke to the Fire Chief at a community meeting and asked him, "if the proposed project were built and there was an emergency and we had to leave, which way I should turn when I leave Great Circle to get out of the area". His response was to "have a good smoke mask and go to the water because it would not be possible to get out of the area."

Unidentified 1,000-person school: This is one of the most troubling aspects of the project. North Coast has not identified what type of school and whether the students will be required to live on campus. The type of school and the living conditions imposed on the students will have significantly different impacts on traffic. The developer's refusal to specify what type of school makes a meaningful environmental analysis impossible.

Construction noise and number of years: The EIR says construction noise is significant and unavoidable and will exceed acceptable levels for the entire duration of the construction. The project will take years to build, significantly longer than the 4 years identified in the plan, with more realistic expectations of up to 10 years.

Senior Residential Care Center: A separate 106-unit residential care center at 70 North Knoll Road has already been approved with no public hearing. Not only does Strawberry not need another senior care center in the proposed North Coast project, with its associated visitation traffic and medical traffic, but the timing of this center being built coincident with the timing of the North Coast project construction has not been analyzed. CEQA requires this analysis.

In addition, I am opposed to the **unacceptably low number of parcel tax properties** for the number of units that are being proposed. The number of units and the accompanying structures with their occupants will add to the services needed in the Strawberry community. Inevitably, the existing parcel holders in Strawberry will have to absorb these new non-parcel tax units. This needs to be modified.

The EIR identified 13 significant, detrimental impacts. Please deny or mandate that the plan be modified so these impacts do not happen.

Respectfully,

Leslie Gardner

From: [Ramin Taleghani](#)
To: [PlanningCommission](#)
Subject: Letter on P1490
Date: Wednesday, February 25, 2026 11:38:14 AM

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Hello,

I live at 8 Deer Hill Court in the Strawberry neighborhood of Mill Valley. My family and I have lived in Strawberry for nearly seven years. I am writing regarding the proposed development at 201 Seminary Drive (P1490) because it will directly affect the safety of our community.

I welcome thoughtful growth, and housing on the seminary property can make sense. What does not make sense is adding thousands of daily vehicle trips to a neighborhood with no sidewalks on key school routes and calling that safe. The central issue is traffic volume. Without materially reducing additional vehicle trips, pedestrian safety in upper Strawberry will deteriorate.

The developer's traffic study for the previously proposed 234-unit plan projected 4,323 daily vehicle trips. The current 337-unit proposal will generate even more. The Environmental Impact Report identifies traffic as a significant and unavoidable impact. During the Seminary Tomorrow process, 70% of surveyed residents stated that 3,000 daily trips was the maximum acceptable threshold, a figure already exceeded by the smaller plan.

Vehicle trips are not an abstract metric; they are cars on Reed Boulevard, Ricardo Road, and Richardson Way - streets with no sidewalks where children walk in the roadway every day. Reed Boulevard includes a blind curve with no sidewalk, no mirror, and no warning signage. Increasing traffic here without meaningful reduction is unsafe.

Before approval, there should be an independent reassessment of projected vehicle trips and project scale, with the goal of bringing additional daily trips meaningfully closer to the 3,000 threshold identified by the community.

Pedestrian safety cannot be optional. I respectfully urge the Commission to require a revised traffic analysis and project adjustments that substantially reduce daily vehicle trips.

Respectfully,
Ramin Taleghani
8 Deer Hill Court
Mill Valley, CA

From: [Marriane Sioson Taleghani](#)
To: [PlanningCommission](#)
Subject: Letter re Proposed Development in Strawberry (Seminary)
Date: Wednesday, February 25, 2026 8:12:51 PM

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Dear Members of the Planning Commission:

I live in the Strawberry neighborhood of Mill Valley, and I am writing regarding the proposed development at 201 Seminary Drive (P1490). My family and I value this community deeply, and I am concerned that the scale of the current proposal will have a profound and lasting impact on the safety and livability of Strawberry.

I support thoughtful, well-planned growth. Housing on the Seminary property can make sense if it is appropriately scaled and supported by adequate infrastructure. What gives me pause is the magnitude of the proposed development and the corresponding increase in daily vehicle trips into a neighborhood that lacks the road and pedestrian infrastructure necessary to safely accommodate that growth.

The central issue is not growth itself, but scale. A project of this size will significantly increase population density and traffic volume on streets that were not designed for it. Reed Boulevard, Ricardo Road, and Richardson Way are already constrained corridors. Several key routes lack continuous sidewalks, and in certain stretches pedestrians — including schoolchildren — must walk along or within the roadway. Increasing daily vehicle trips in this environment heightens the risk of congestion, delays for emergency access, and, most importantly, pedestrian safety concerns.

Traffic volume is not an abstract projection; it translates directly into more cars navigating blind curves, narrow lanes, and school routes without basic pedestrian protections. Without meaningful investment in road widening, traffic calming, sidewalks, and intersection safety improvements, the proposed scale will disproportionately burden the existing community.

Growth should not outpace infrastructure. Before any approval, there should be a careful reassessment of whether the surrounding roads and sidewalks can safely support the projected increase in residents and vehicle trips. If they cannot, the project should be resized or conditioned to ensure that traffic impacts are substantially reduced and that comprehensive pedestrian improvements are in place prior to occupancy.

Safety must be foundational, not an afterthought. I respectfully urge the Planning Commission to closely examine the scale of this proposal, require updated and independent traffic analysis, and ensure that any development approved for the Seminary property aligns with the capacity and safety needs of the Strawberry community.

Thank you for your consideration.

Marriane S. Taleghani, Esq., MPA
email: Mbsioson@gmail.com

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Stephen Disenhof & Joanne Hom, MD
34 Topside Way
Mill Valley, CA 94941

Marin County Planning Commission
Marin County Civic Center

25 February 2026

RE: EIR for Strawberry Seminary Project

I plan to speak at Monday's hearing on the EIR and have also provided several written comments pertaining to the original responses I submitted with regard to the EIR.

I wish to limit this letter to three areas.

1. The Planning Department, throughout the EIR document, stated that its assessments used the 1953 CUP as the governing document for the project. The Planning Department stated clearly that, if the applicant wishes to change the authoritative document, that would be the role of the Board of Supervisors. The Planning Department stated that its assessments were on the proposal submitted by the applicant.

The Strawberry Design Review Board unanimously rejected the proposal on the grounds that the details of the "school" were not provided. That hasn't changed in 13 years.

Your predecessors on the Marin County Planning Commission overwhelmingly rejected on this (and other) grounds. The Planning Department then went around the Commission and put the issue to the Board of Supervisors. The minutes of the last Planning Commission meeting made it clear that this circumvention was part of the reason one of the Commissioners resigned.

In 1953 Strawberry was completely undeveloped. It contained goats and goat paths. The Board of Supervisors issued a Conditional Use Permit for a "self-contained" Seminary, not a 1,000 student plus staff commuter school. Strawberry now has hundreds of homes, apartments and condominiums, a busy health club, an elementary school. All serviced by two narrow roads that cannot be widened. If the 1953 proposal was submitted to the County in 2026 and was for a commuter school, it would certainly have been denied.

2. The EIR states that the school will have 216 employees for its 1,000 students. This is a significant undercount. No tertiary school in the Bay Area has so few employees. I did a deep dive with comparable schools in the Bay Area and the median non-student employee to student ratio is 35% (meaning that half of the schools had more employees). The current proposal states 21.6% employees to students.

Since the applicant plans to provide housing to approximately 300 students and faculty,

it follows that over 1,000 will need housing in Marin County. And ALL of the ~140 additional employees will be commuters.

For this reason alone, all of the assessments in the EIR that pertain to transportation, housing and related items need to be redone. The EIR is significantly flawed.

3. What is the effect of dropping 1,000+ new residents into Marin's housing market? The vacancy rate stated in the EIR is simply wrong. The actual vacancy rate in Marin is less than 5%, which experts believe is critically low.

Mill Valley has announced that it will pay landlords up to \$14,000 each if they provide new rental housing. The Marin County Board of Supervisors just agreed to buy a building in Novato due to exceptionally high rental rates in Marin.

A economic review that I prepared and sent as a response to the EIR shows that approval of a ~1,350 person commuter school, with onsite housing for only 300 will cause rental rates in Marin to increase by 4% (plus inflation). One-third of all Marin residents rent their homes. If the school is not self-contained as originally provided for by the 1953 CUP, one-third of Marin residents will see their out-of-pocket home costs rise.

This does not need to happen. The community does not want a commuter school in Strawberry. Even the applicant doesn't believe the 1953 CUP allows them to convert a self-contained Seminary into a 1,350 person commuter school, which is why it is asking Marin County to change the governing documents for the property.

And I will conclude by saying, even the Educational Community doesn't want a school on that site. The applicant has had 13 years to find a tenant and has been rejected time and again. The only 'taker' is Olivet University, which had its educational license revoked in January following Federal and State investigations for fraud and human/labor trafficking.

Marin needs housing, not a commuter school. I urge the Planning Department to reject the EIR and suggest the applicant replace the school with additional housing.

Thank you.

Stephen Disenhof

From: [JG Berger](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 1:10:05 PM

[You don't often get email from sfjaneb@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is Jane Berger . I live at 121 Seminary Dr apt F in Strawberry and I'm a daily pedestrian in this neighborhood. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

In addition to the below topics:

It is IMPERATIVE that all constituents INCLUDING RENTERS at Strawberry Shores and Harbor Point are included in the mailings notifying residents and VOTERS of the upcoming hearings. Please add all neighborhood residents to your notifications, not just property owners. This is a grave and discriminatory oversight. Thank you.

I support building housing in Strawberry. I support the affordable and senior components of this project. What I don't support is approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

One issue that concerns me greatly is the effect on emergency response times. The fire station on Reed Boulevard serves this entire area. Adding thousands of daily vehicle trips to an already congested road network means ambulances and fire trucks will face longer response times — on roads that are too narrow for vehicles to pull over and let them pass. Minutes matter in emergencies. This deserves more analysis than the EIR has provided.

I am particularly concerned that the Strawberry Community Plan — which restricts this property to seminary-related uses with all students living on campus — is being set aside to accommodate this development. The community plan was created through a democratic process and represents the community's agreement about how this land should be used. Amending it to allow 337 units of public market-rate housing and an undefined commuter school is a fundamental change that deserves far more scrutiny than it's getting.

There is a blind curve on Reed Boulevard that children navigate on foot every school day. No sidewalk, no mirror, no signage. Cars parked on the inside of the curve eliminate any sightline. The county knows about this — more than 100 residents have petitioned for improvements. None have been made, and the project would dramatically increase traffic here.

The numbers speak for themselves. The seminary at peak operation generated about 1,600 daily trips. The current Olivet tenancy produces roughly 2,300. The proposed project would push that well beyond 4,300 daily trips — on the same narrow roads with no sidewalks. The EIR admits this impact is significant and unavoidable.

I hope the Commission will take these concerns seriously and attach meaningful conditions to any approval.

Infrastructure and safety must come before occupancy.

With respect,

Jane Berger
121 Seminary Dr apt F
Strawberry, Mill Valley

Sent from my iPhone

From: [Paul Hartman](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 10:57:43 AM

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Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

My name is paul hartman. I live at 78 vista del sol mill valley in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

Additional traffic with no sidewalks, will create extremely hazardous conditions for me and my family. Congestion is already awful in this neighborhood and without appropriate mitigation will severely impact our lives.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
paul hartman
78 vista del sol mill valley
Strawberry, Mill Valley

From: [Vikki Goldman](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 12:04:51 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 40 bayview terrace in Strawberry, and a parent of children who attend Tamalpais High School. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Drive. As someone who has lived here for years, I've watched conditions on these streets deteriorate even before any new development.

I've lived in Strawberry for years and I welcome new neighbors. Housing development on the seminary property makes sense. What doesn't make sense is adding thousands of daily vehicle trips to roads with no sidewalks and calling it safe. I support this project — with real safety conditions.

The curve on Reed near Ricardo is genuinely dangerous. Cars park on the inside of the turn, so there's zero visibility. Kids walk in the road because there's no sidewalk. I've seen near-misses. Adding hundreds more daily vehicle trips through here without fixing this is reckless.

North Coast claims a 1953 conditional use permit allows them to run a 1,000-student school, but they won't say what kind of school. The SNA's attorney argues the 1953 permit was superseded by a 1984 Master Plan. Even if it's valid, the original permit assumed students would live on-site, not commute. The Commission should require the developer to define this use before certifying the EIR.

When the seminary was approved, the community plan made clear that housing on the property would be exclusively for students, faculty, and staff — and that the school would be a residential graduate seminary. These weren't vague guidelines; they were binding conditions. The developer is now asking the county to rewrite the community plan to accommodate a completely different use. The residents of Strawberry should not have their community plan gutted to serve a developer's profit motive, regardless of state housing mandates.

I respectfully ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Victoria Goldman
40 bayview terrace
Strawberry, Mill Valley

Vikki Goldman 415.235.4135 Sent from my iPhone

From: [Diane Attersley](#)
To: [PlanningCommission](#)
Cc: michaelgallagher.office@gmail.com
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 8:50:29 AM

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Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

My name is Diane attersley. I live at 224 Richardson dr in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive, Richardson Dr — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

Richardson drive is a narrow one way street with no sidewalk and will be used as an access road for this development.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Thanks,
Diane attersley
224 Richardson dr
Strawberry, Mill Valley

From: [alexander.mouldovan](mailto:alexander.mouldovan@gmail.com)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 12:40:49 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I'm writing as a Strawberry resident and Strawberry Point Elementary parent about the Seminary at Strawberry project (P1490). I live at 320 Ricardo Rd, in close proximity to the proposed development.

I'm pro-housing. I'm not pro-recklessness.

As a resident, this weighs on me every day.

The curve on Reed near Ricardo is genuinely dangerous. Cars park on the inside of the turn, so there's zero visibility.

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, faculty, and staff. The educational use was approved as a residential graduate seminary where students would live on campus.

We go fishing, walk and bike to the Water and look for crab shells. We watch the bird's and especially cooper hawks along Richardson Bay.

I ask the Commission to require pedestrian safety improvements before occupancy.

Alexander
320 Ricardo Rd
Strawberry, Mill Valley

Thanks,

Alex

Alexander Mouldovan

Mobile: [415.218.2775](tel:415.218.2775)

<http://www.linkedin.com/in/crowdfactory>

From: [Edward R. Hugo](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 1:09:04 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is EDWARD HUGO. I live at 1 VISTA REAL, MILL VALLEY in Strawberry and I'm a daily pedestrian in this neighborhood. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I want to be clear: I support housing development in Marin County, including on this site. I welcome the affordable housing and senior care components. But I cannot support a project that proceeds without addressing basic pedestrian safety.

The developer won't identify what type of 1,000-student school it plans to operate. This matters enormously for traffic. A residential campus is very different from a commuter institution. The current EIR doesn't model the traffic from a commuter school because the developer won't disclose the plan. This is a blank check for an undefined use with potentially massive impacts.

Another serious issue: the numbers speak for themselves. The seminary at peak operation generated about 1,600 daily trips. The current Olivet tenancy produces roughly 2,300. The proposed project would push that well beyond 4,300 daily trips — on the same narrow roads with no sidewalks. The EIR admits this impact is significant and unavoidable.

The residents of Strawberry deserve a project that takes their safety seriously. I ask the Commission to require concrete safety conditions before any approval moves forward.

Thank you for your time.

EDWARD HUGO
1 VISTA REAL, MILL VALLEY
Strawberry, Mill Valley

From: [Anthony Falzone](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 2:01:59 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson:

My name is Anthony Falzone. My family and I live at 7 Strawberry Landing in Strawberry — a couple hundred yards from the proposed development. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I support sensible, appropriate, and sustainable development on the seminary property. The current proposal is none of those things.

The Strawberry Community Plan that would be set aside to accommodate this development was created through a democratic process and represents the community's agreement about how this land should be used. It struck a careful balance, providing both low and medium density housing, a residential school (with correspondingly modest impact on traffic, congestion, and pollution), and plenty of open space within the seminary property. Amending the Plan to allow another 337 units of public market-rate housing and an undefined commuter school is a fundamental change that deserves far more scrutiny than it's getting.

The seminary at peak operation generated about 1,600 daily trips. The current Olivet tenancy produces roughly 2,300. The proposed project would push that well beyond 4,300 daily trips, many of which would be on narrow roads with no sidewalks. The EIR admits this impact is significant and unavoidable. This is not an appropriate burden to impose on the residents of Strawberry.

The most troubling aspect of this project is the undefined educational use. A 1,000-student institution could be anything — a residential seminary, a commuter college, a vocational school. Each has wildly different implications. The developer's refusal to specify what it will be makes genuine environmental analysis impossible. The proposal should be rejected for this reason alone: ***The inclusion of an undefined educational use in this proposal means no one knows what will actually happen, or the impact it will have on the Strawberry neighborhood. Meaningful assessment is impossible here.***

Whatever form it takes, a project of this scale will take years to build. During that period, construction traffic will use the same roads our kids walk on — roads with no sidewalks. The

EIR says construction noise is significant and unavoidable. But it can be diminished, if the Commission does the sensible thing and requires significant changes to the proposed development.

The county's own 684-page Environmental Impact Report — paid for by the developer — identifies 13 significant environmental impacts, three of which cannot be mitigated: traffic, greenhouse gas emissions, and construction noise. When the developer's own analysis says the impacts can't be fixed, that should give the Commission serious pause.

There are plenty of other options available here, including renovation of the existing housing or even new construction within the existing footprint of the current structures. Instead of proposing something sensible, appropriate, and community-minded, the developer has tendered a proposal aimed to making as much money as possible. But we, the residents of Strawberry, are the ones who have to foot the bill for this money grab by suffering all of the unavoidable impacts the developer's own EIR acknowledges.

The Commission should reject this proposal, and insist on one that would have a more modest impact and does not include something so absurd as a “school to be named later.”

Sincerely yours

Anthony Falzone
7 Strawberry Landing
Mill Valley CA 94941

From: [Brandon Jewett-Hall](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 4:11:13 PM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is Brandon Jewett-Hall. I live at 156 Richardson Drive in Strawberry with my family and we are daily bicycle commuters and pedestrians in this neighborhood. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

Traffic from this project will exceed county thresholds and cannot be mitigated. That is the conclusion of the developer's own environmental review. When a smaller plan was previously proposed, 70% of Strawberry residents said 3,000 trips per day was the limit, but even the smaller plan exceeded by over 1,300 trips. The current, full 337-unit plan under consideration is substantially worse. This is unacceptable.

I request that the commission and my elected government representatives use their power to reject the current plan and require a lower impact alternative.

Respectfully,

Brandon Jewett-Hall
156 Richardson Drive
Strawberry, Mill Valley

From: [Ajmayer](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 4:41:27 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is Andrew Mayer. I live at 22 Topside Way in Strawberry and I'm a daily pedestrian in this neighborhood. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I support building housing in Strawberry. I support the affordable and senior components of this project. What I don't support is approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

There is a fire station on Reed Boulevard. When traffic on Seminary Drive quadruples, the surrounding streets will clog — including the very roads that fire trucks and ambulances use to reach homes in upper Strawberry. The SNA's independent peer review flagged deficiencies in the EIR's emergency response time analysis. This isn't theoretical. Delayed emergency response costs lives.

Another serious issue: i want to emphasize that these aren't claims from project opponents. The developer's own EIR identifies 13 significant impacts and concludes that three — traffic, greenhouse gases, and construction noise — simply cannot be mitigated. If the project's own environmental review says it causes unavoidable harm, why would we approve it without major conditions?

The curve on Reed near Ricardo is genuinely dangerous. Cars park on the inside of the turn, so there's zero visibility. Kids walk in the road because there's no sidewalk. I've seen near-misses. Adding hundreds more daily vehicle trips through here without fixing this is reckless.

The residents of Strawberry deserve a project that takes their safety seriously. I ask the Commission to require concrete safety conditions before any approval moves forward.

Thank you for your time.

Andrew Mayer
22 Topside Way
Strawberry, Mill Valley

Sent from my iPad

From: [Mike Mascott](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 4:49:17 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident and own 244 Ricardo Road Mill Valley CA 94941 in Strawberry. I am writing regarding the proposed Seminary Strawberry development at 201 Seminary Drive.

I'm not opposed to development on the seminary property. Marin needs housing, and I support the affordable units in this project. What I'm asking for is that safety be a condition of approval, not an afterthought.

Construction noise is one of the three significant and unavoidable impacts identified in the EIR. The developer estimates a 4-year timeline. The SNA's attorney calls this unrealistic and suggests a decade is more likely. That means construction vehicles on school walking routes for potentially the entire duration of a child's K-8 years in Strawberry schools.

The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more. The EIR identifies traffic as a significant and unavoidable impact. A community survey during the Seminary Tomorrow process found that 70% of residents said 3,000 daily trips was the maximum acceptable threshold.

Another serious issue: when Seminary Drive backs up — and it will — navigation apps will route drivers onto Reed Boulevard, Ricardo Road, East Strawberry Drive, and other residential streets. These are narrow roads with no sidewalks where children walk. It's unclear whether this diversion has even been modeled in the EIR. If it hasn't, the traffic analysis is fundamentally incomplete.

Please ensure that pedestrian safety is not treated as optional. The Commission has the authority to require real protections — I'm asking you to use it.

Sincerely,

Michael Mascott
244 Ricardo Road Mill Valley CA 94941

Strawberry, Mill Valley

From: [Larry Serandos](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 4:52:13 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am 88 years old and has lived at 406 E Strawberry Dr Mill Valley in the Strawberry neighborhood for many many years. I'm writing about the proposed development at 201 Seminary Drive (P1490) because it will directly affect the safety of our community. As an abutter to the Seminary I have direct impact from the planned development especially the long term construction estimated to be between 4-10 years.

I am not opposing housing. I believe Marin needs more homes and I welcome reasonable development on this site. But the scale of this project demands that basic safety infrastructure be built before — not after — residents move in. There must be more clarity as to the school coming in and other significant impacts.

My street, East Strawberry Drive, will become a cut-through. When Seminary Drive is congested, GPS apps will send cars down residential streets. This isn't speculation — it's how modern navigation works. Reed, Ricardo, Richardson, Meda — all of them will see overflow traffic. And none of them have sidewalks to protect pedestrians.

The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more. The EIR identifies traffic as a significant and unavoidable impact. A community survey during the Seminary Tomorrow process found that 70% of residents said 3,000 daily trips was the maximum acceptable threshold.

North Coast claims a 1953 conditional use permit allows them to run a 1,000-student school, but they won't say what kind of school. The SNA's attorney argues the 1953 permit was superseded by a 1984 Master Plan. Even if it's valid, the original permit assumed students would live on-site, not commute. The Commission should require the developer to define this use before certifying the EIR. Students living on-site vs off campus is a very different proposition.

When the seminary initially was approved, the community plan made clear that housing on the property would be exclusively for students, faculty, and staff — and that the school would be a residential graduate seminary. These weren't vague guidelines; they were binding conditions. The developer is now asking the county to rewrite our community plan to accommodate a completely different use. The residents of Strawberry should not have their well thought out and agreed upon community plan gutted to serve a developer's profit motive. State housing mandates don't supersede community Life, Safety, and Health requirements.

The county's own 684-page Environmental Impact Report — paid for by the developer — identifies 13 significant environmental impacts, three of which cannot be mitigated: traffic, greenhouse gas emissions, and construction noise. When the developer's own analysis says the impacts can't be fixed and negatively impact our Life, Safety and

Health, that should give the Commission serious pause.

I respectfully ask the Commission to review the project based primarily on the Life, Safety and Health aspect not the Developer or County Staffs desires. As the EIR is lacking, the project requires a full analysis before certifying the insufficient EIR.

Thank you for your consideration.

Yoko Russell
406 E Strawberry Dr Mill Valley
Strawberry, Mill Valley

From: [Tanya Montencourt](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 5:14:59 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

I worry about the many children walking to school and riding their bikes, and the neighbors walking their dogs.

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

As a resident of 311 Ricardo Road in Strawberry, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision.

I'm not opposed to development on the seminary property. Marin needs housing, and I support the affordable units in this project. What I am asking of you is that safety be a condition of approval, not an afterthought.

This keeps me up at night.

When Seminary Drive backs up — and it will — navigation apps will route drivers onto Reed Boulevard, Ricardo Road, East Strawberry Drive, and other residential streets. These are narrow roads with no sidewalks where children walk. It's unclear whether this diversion has even been modeled in the EIR. If it hasn't, the traffic analysis is fundamentally incomplete.

Another serious issue: the numbers speak for themselves. The seminary at peak operation generated about 1,600 daily trips. The current Olivet tenancy produces roughly 2,300. The proposed project would push that well beyond 4,300 daily trips — on the same narrow roads with no sidewalks. The EIR admits this impact is significant and unavoidable.

This isn't just about children walking to school. Strawberry is a neighborhood where people walk their dogs, go for runs, ride bikes, and enjoy being outdoors on foot. Seniors in our community rely on being able to walk safely on these roads. None of these streets have sidewalks. Adding thousands of daily vehicle trips without pedestrian infrastructure puts every person on foot at risk — not just during school hours, but all day long.

I respectfully ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Tanya Di Dio
311 Ricardo Road
Strawberry, Mill Valley

Sent from my iPhone

From: [Alexis Morgenthaler](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 8:41:54 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 223 Meda Lane in Strawberry. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Drive.

Let me say upfront: I am pro-housing. I understand Marin's obligations under state law and I support responsible development. This letter is not about stopping housing. It is about ensuring that infrastructure keeps pace with density.

The developer won't identify what type of 1,000-student school it plans to operate. This matters enormously for traffic. A residential campus is very different from a commuter institution. The current EIR doesn't model the traffic from a commuter school because the developer won't disclose the plan. This is a blank check for an undefined use with potentially massive impacts.

I'm also concerned about traffic from this project will exceed county thresholds and cannot be mitigated. That is the conclusion of the developer's own environmental review. When 70% of Strawberry residents said 3,000 trips per day was the limit, even the smaller plan exceeded that by over 1,300 trips. The full 337-unit plan is substantially worse.

The county's own 684-page Environmental Impact Report — paid for by the developer — identifies 13 significant environmental impacts, three of which cannot be mitigated: traffic, greenhouse gas emissions, and construction noise. When the developer's own analysis says the impacts can't be fixed, that should give the Commission serious pause.

I respectfully ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Alexis Morgenthaler
223 Meda Lane
Strawberry, Mill Valley

From: [Kathryn Rorer](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 9:25:50 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 24 Weatherly Drive in Strawberry, and a parent of children who attend Strawberry Point Elementary. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Drive.

I'm not opposed to this development. What I'm asking for is that the safety of residents and children — including mine — be a condition of approval. These are the roads our kids walk on every day, and there are limited routes my family can take to leave the neighborhood in an emergency or for emergency vehicles to reach our immediate area. The increased noise from construction for a significant portion if not all of my children's elementary school years as well as increased pollution from the significant increase in traffic will negatively impact my family's well being and health.

North Coast claims a 1953 conditional use permit allows them to run a 1,000-student school, but they won't say what kind of school. The SNA's attorney argues the 1953 permit was superseded by a 1984 Master Plan. Even if it's valid, the original permit assumed students would live on-site, not commute. The Commission should require the developer to define this use before certifying the EIR.

The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more. The EIR identifies traffic as a significant and unavoidable impact. A community survey during the Seminary Tomorrow process found that 70% of residents said 3,000 daily trips was the maximum acceptable threshold.

Another serious issue: there is a fire station on Reed Boulevard. When traffic on Seminary Drive quadruples, the surrounding streets will clog — including the very roads that fire trucks and ambulances use to reach homes in upper Strawberry. The SNA's independent peer review flagged deficiencies in the EIR's emergency response time analysis. This isn't theoretical. Delayed emergency response costs lives.

My children will be going to school past active construction for years. The developer says 4 years. The SNA's legal counsel says it could take a decade. Either way, construction vehicles will be sharing roads that have no sidewalks with children on foot. What specific protections will be in place during school arrival and dismissal hours?

The residents of Strawberry deserve a project that takes their safety seriously. I ask the Commission to require concrete safety conditions before any approval moves forward.

Thank you for your time.

Kate Doppelt
24 Weatherly Dr, Mill Valley, CA 94941
Strawberry, Mill Valley

Sent from my iPhone

From: [Lindsay Goyne](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 11:16:43 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident at 114 Almonte Blvd and my daughter goes to pre-school in Strawberry. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Drive.

I support building housing in Strawberry. I support the affordable and senior components of this project. What I don't support is approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

My concern is simple: the roads between the seminary property and Strawberry Point Elementary have no sidewalks. Not some of them — none of them. Reed, Ricardo, Richardson, Meda. Kids walk in the street. The project proposes to massively increase traffic on these roads without building a single foot of sidewalk outside the property boundary.

Today, walking these roads with my children is scary, and I'm genuinely concerned for our safety. Reed Boulevard with its blind curve, Ricardo with its steep grade, East Strawberry with its narrow lanes — these are dangerous for pedestrians right now, before any development. I've had close calls with cars. Adding thousands more daily trips without building any pedestrian infrastructure is going to get someone seriously hurt. This affects all of us who live here and move through the neighborhood on foot.

Reed Boulevard has a blind curve near Ricardo Road where parked cars block the sightline completely. There are no sidewalks. Children walking to school have to step into the middle of the road, unable to see oncoming traffic. This is already the subject of a petition signed by over 100 residents — and the development would send significantly more cars through this exact spot.

I hope the Commission will take these concerns seriously and attach meaningful conditions to any approval. Infrastructure and safety must come before occupancy.

With respect,

Lindsay Goyne
114 Almonte Blvd
Mill Valley

From: [Josh Ferguson](#)
To: [PlanningCommission](#); michelle.levenson@marincounty.org
Cc: stephanie.moultonpeters@marincounty.org
Subject: Public Comment re: the proposed Seminary at Strawberry
Date: Wednesday, February 25, 2026 8:39:57 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment on the proposed Seminary at Strawberry (P1490)

Hello, my name is Josh Ferguson. I grew up in Mill Valley, and my wife and I are now raising our own kids here in Strawberry. We live at 224 Meda Lane near Reed, quite close to the proposed development at 210 Seminary Drive. While I support the Seminary project, I am writing to express a few concerns.

Pedestrian and cyclist safety:

Most significantly, I am worried about a dramatic increase in neighborhood traffic, and a commensurate decrease in safety for pedestrians and cyclists. The narrow, blind curves within the surrounding neighborhood are already unsafe with the current traffic load, estimated at ~2,000 daily trips driven. Should the development result in an estimated ~5,000 daily trips, these safety concerns will be compounded: particularly during times of rush-hour congestion, harried drivers will seek shortcuts through these same, narrow neighborhood streets.

The EIR recognizes traffic as a significant and unavoidable impact of the project, surpassing Marin County's acceptable limits. However, traffic is not a binary issue, but rather one of scale. The greater the volume of traffic, the greater the risk. North Coast Land Holdings is characterizing traffic vehicle miles travelled as "unavoidable" while concurrently seeking to remove the stipulation that students must live on campus, thereby ignoring the impact of traffic **volume**. I respectfully request that the Planning Commission cap school enrollment at 400 or fewer, and maintain the conditional use requirement for students to live on campus as a means to help reduce additional traffic.

In addition, please recommend to the Board of Supervisors the idea of retractable bollards on Reed Boulevard near the fire station, blocking through-traffic for all but first responders. If North Coast Land Holdings rejects this, then it seems an implicit acknowledgement that the shortcut through neighborhoods would be appealing and useful for residents of the development.

Support of county infrastructure:

I respectfully request the Planning Commission to require NCLH to pay property tax on a per-unit-developed basis, rather than for only ten parcels. The latter surely would not cover the actual cost of increased services demanded of the police department and the fire station, nor

the additional burden on road maintenance, water and sewer infrastructure, and so forth. We all pay our part, and NCLH should as well.

Protected tree removal:

The landscaping renderings forwarded by NCLH feature multiple slides with many compelling images of oak savanna, oak forest, and magnificent, mature oaks. Meanwhile, review of their tree removal document shows that the project as currently scoped would entail the removal of 173 protected oaks. Please require that a significant portion of these are relocated within the development, rather than simply cut down. There are companies which specialize in this very task, and the end result is a better-looking, more hidden, more ecological project.

In conclusion, the county is clearly at an historical crossroads, and imminent decisions will forever affect the feel and safety of the local neighborhood. I recognize Marin's need for more housing and senior care. I want the Seminary at Strawberry to succeed, but I respectfully request that the Planning Commission not ignore the carefully considered precedent of the Strawberry Community Plan. In summary, please recommend :

** Limiting school enrollment to 400 or fewer, with students housed on campus per the 1953 conditional use permit (which the EIR claims still governs the property)*

** Affordable housing preference granted to teachers, first responders, and others who serve the community*

** Installation of retractable bollard(s) on Reed Boulevard near Storer Drive*

** Parcel tax assessment based on fair market value of units built, rather than on only ten parcels*

** Reduction of scope of protected oak removal*

Thank you for your consideration of these important matters.

Respectfully,
Josh Ferguson
224 Meda Lane
Strawberry, Mill Valley

From: [Steve Disenhof \(gmail\)](#)
To: [PlanningCommission](#); [Michelle Levenson](#); [Stephanie MoultonPeters](#)
Cc: ["Michael Gallagher"](#)
Subject: RE Planning Commission Hearing on Strawberry Seminary EIR
Date: Wednesday, February 25, 2026 8:44:17 PM
Attachments: [Marin County Planning Commission25 February 2026.pdf](#)

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Attached please find my letter in regard to the Strawberry Seminary EIR to be heard on Monday, March 2nd.

Thank you.

-sd

Steve Disenhof
stevedisenhof@gmail.com
www.stevedisenhof.com

From: [No-Reply](#)
To: [PlanningCommission](#)
Subject: Re: Public Comment — Seminary at Strawberry (P1490) [SENT FROM A PUBLIC FORM]
Date: Wednesday, February 25, 2026 7:18:13 PM

Contact Us

Email To: planningcommission@marincounty.gov

Hosted Page: <https://www.marincounty.gov/departments/cda/planning/boards-commissions-and-public-hearings/about-planning-commission>

To: by email

From: Marissa Styne

Sender's Email Address: mbstyne@gmail.com

Subject: Public Comment — Seminary at Strawberry (P1490)

Message: My name is Marissa Styne. I live at 228 Richardson Drive in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

The blind curve on Reed Boulevard near Ricardo is a daily hazard. My child walks past this spot every school morning. Vehicles park on the inside of the curve, reducing visibility to near zero. There is no sidewalk. With double or triple the current traffic, this is a child's life at stake.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily

vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Marissa Styne
228 Richardson Drive
Strawberry, Mill Valley

2026-02-25 07:15PM -0800
IP: 2a09:bac2:6559:3046::4cf:2a

From: [Greg Wolff](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Re: Public Comment — Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 3:51:48 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 366 E. Strawberry Drive in Strawberry. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Road. I've been a resident of Strawberry for more than 30 years.

This is not a letter opposing housing. I believe Marin needs more homes and I welcome development on this site. But the scale of this project demands that basic safety infrastructure be built before — not after — residents move in.

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, faculty, and staff. The educational use was approved as a residential graduate seminary where students would live on campus. North Coast is asking the county to amend these restrictions so it can build market-rate housing and operate an undefined school. The community plan represents years of community input and democratic process. Overriding it to meet state housing quotas undermines the very concept of local planning.

The EIR identifies 13 significant environmental impacts. Three are classified as significant and unavoidable — meaning no feasible mitigation exists. Traffic exceeds county thresholds. Construction noise will impact the neighborhood for years. These are the developer's own findings, not the community's allegations.

North Coast claims a 1953 conditional use permit allows them to run a 1,000-student school, but they won't say what kind of school. The SNA's attorney argues the 1953 permit was superseded by a 1984 Master Plan. Even if it's valid, the original permit assumed students would live on-site, not commute. The Commission should require the developer to define this use before certifying the EIR. **I would not oppose a small graduate school with mostly residential students, but a large commuter school would not work in this neighborhood.**

I ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Greg Wolff
366 E. Strawberry Dr.,
Strawberry, Mill Valley

From: [Michelle Levenson](#)
To: [Taryn Hoppe](#); [PlanningCommission](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Re: Public Comment regarding safety— Seminary at Strawberry (P1490)
Date: Wednesday, February 25, 2026 6:59:00 AM

Thank you for your comments, Taryn. We will be sure to provide your email to the Planning Commission.

Regards-
Michelle

From: Taryn Hoppe <taryn.hoppe@gmail.com>
Sent: Tuesday, February 24, 2026 8:17 PM
To: PlanningCommission <PlanningCommission@MarinCounty.gov>; Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Cc: Stephanie MoultonPeters <Stephanie.MoultonPeters@MarinCounty.gov>
Subject: Public Comment regarding safety— Seminary at Strawberry (P1490)

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FEBRUARY 24, 2026

Planning Commission Secretary Community Development Agency 3501
Civic Center Drive, Suite 308 San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

My name is Taryn. I live at 10 Vista Real the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive. Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children. My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited

sight lines. These are the roads our children walk and bike on every day to get to school.

Quadrupling the amount of cars for this project without any requirements for street level infrastructure safety upgrades at key ointersections or adding sidewalks is unfathomable. It appears that the only requirement suggested by the County is to add sensors to allow emergency vehicles access to traffic signals (which many key intersections do not have, including by the school. The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there. I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less. Respectfully, Taryn Hoppe Strawberry, Mill Valley

From: [Michelle Levenson](#)
To: [Perry Simon](#); [PlanningCommission](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Re: Seminary at Strawberry Project (county project P1490) -- "Yes...but..."
Date: Wednesday, February 25, 2026 7:00:22 AM

Thank you for your email, Perry. I will be sure to forward your comments to the Planning Commission.

Regards-
Michelle

From: Perry Simon <perrysimon@gmail.com>
Sent: Tuesday, February 24, 2026 9:02 PM
To: PlanningCommission <PlanningCommission@MarinCounty.gov>; Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Cc: Stephanie MoultonPeters <Stephanie.MoultonPeters@MarinCounty.gov>
Subject: Seminary at Strawberry Project (county project P1490) -- "Yes...but..."

You don't often get email from perrysimon@gmail.com. [Learn why this is important](#)

Dear Members of the Marin County Planning Commission,

As a Strawberry homeowner for over a decade, I have been extraordinarily impressed by the commitment of our Strawberry community to recognize the need for additional housing and to work tirelessly to find common ground with the Seminary Project developers (North Coast Land Holdings LLC) to arrive at common sense solutions for the many challenges that face a development of this scale. Please know that our community understands Marin County's housing obligations and we support responsible development that includes affordable units, senior housing and community amenities.

In that spirit, I urge you to give due consideration to the very basic concerns currently being raised by our neighborhood association. My home is located near the intersection of Reed Blvd and Ricardo Road, where there are narrow streets with no sidewalks, no bike lanes, steep grades, blind curves and limited sight lines. These are the roads our children walk and bike on every day to get to school. Please take our safety concerns to heart, as well as the other very reasonable mitigation requests that are being presented to you at this time.

Sincerely,

PERRY SIMON
134 Reed Blvd.
Mill Valley, CA

**ROBERT W. HENDRY COMMENTS REGARDING GEOLOGY TO
THE PLANNING COMMISSION REGARDING NCLH EIR STUDY – MAR 2026**

Planning Commissioners,

Thank you for your time for allowing me to address you regarding the serious problem with soil erosion in the proposed Seminary area. As you may not be aware, considerable soil erosion has been taking place all around the Seminary property without the proposed development and its consequent construction. Many of us in the area has spent considerable sums in shoring up the hillside of our homes due to the natural erosion taking place.

Again, the final EIR states, the level of construction being proposed poses a significant risk on the community especially on the slopes surrounding the property. It concludes again that mitigation requires the preparation of design-level geotechnical engineering reports prior to the issuance of a project permit by the Marin County Department of Public Works.

Specifically, it states that a geotechnical consultant to perform supplemental exploration, laboratory testing, and engineering analyses to define the slope stability and landslide avoidance, improvement, or repair required in the design of project features in each catalogued area of instability.

Examples of repair and/or improvement of landslides may include one of a combination of the following methods, or other engineering strategies defined during geotechnical engineering design:

- excavation of unstable material, installation of subsurface drainage and construction of a compacted earth fill buttress;
- design and construction of retaining surfaces (above and below ground pile walls and shear keys);
- de-watering with subsurface drainage;
- removal of the entire unstable landslide mass; or
- other methods as deemed acceptable to Marin County.

Given the extent of previous geotechnical reports and this level of concern expressed in the EIR, is wise to go forward with this level of development.

Given the notices projected by Geotechnical experts, the County and the developer will face considerable legal claims if the work is found to be substandard to any degree. Given the obvious danger to the Community, please do not let this project as it is proposed go forward. More attention needs to be given to the size of the project and its geological impact.

From: [Perry Simon](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Seminary at Strawberry Project (county project P1490) -- "Yes...but..."
Date: Tuesday, February 24, 2026 9:03:05 PM

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Dear Members of the Marin County Planning Commission,

As a Strawberry homeowner for over a decade, I have been extraordinarily impressed by the commitment of our Strawberry community to recognize the need for additional housing and to work tirelessly to find common ground with the Seminary Project developers (North Coast Land Holdings LLC) to arrive at common sense solutions for the many challenges that face a development of this scale. Please know that our community understands Marin County's housing obligations and we support responsible development that includes affordable units, senior housing and community amenities.

In that spirit, I urge you to give due consideration to the very basic concerns currently being raised by our neighborhood association. My home is located near the intersection of Reed Blvd and Ricardo Road, where there are narrow streets with no sidewalks, no bike lanes, steep grades, blind curves and limited sight lines. These are the roads our children walk and bike on every day to get to school. Please take our safety concerns to heart, as well as the other very reasonable mitigation requests that are being presented to you at this time.

Sincerely,

PERRY SIMON
134 Reed Blvd.
Mill Valley, CA

From: [Leslie Gardner](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#); [Michael Gallagher](#)
Subject: Seminary Project
Date: Wednesday, February 25, 2026 5:01:37 PM
Attachments: [Leslie Gardner letter Feb 25 2026.docx](#)

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Dear Members of the Planning Commission and Secretary Levenson,

My name is Leslie Gardner and I have lived in my home at 159 Great Circle Drive, Mill Valley 94941 for over 41 years. My home is in very close proximity to the former Seminary property at 201 Seminary Drive. In fact, I must drive on the one lane, Seminary Drive, winding road past the entrance to the project to get to my home.

I understand Marin County's housing obligations and I am not opposed to building responsible housing on the site now owned by North Coast Land Holdings LLC. What I am opposed to is the **scale of the project**, which includes:

- 337 rental properties with 70 designated as below market rate affordable housing
- a school that is undefined with 1,000 students and no guarantee that these students will be graduate students that live on campus
- a senior care center with 100 independent units and 50 assisted care units
- a day care facility and gym
- buildings at 6 stories, which is out of sync with the buildings in the area
- the 250 additional workers on the property

The scale of the project being proposed will result in **significant and dangerous traffic and will exceed the time frame identified to build the development.**

My primary objections to this project are as follows:

Traffic and safety: The EIR identifies traffic as a significant and unavoidable impact. The new development will exceed 5,000 daily trips on the one lane Seminary Drive. This by far, exceeds the county's threshold. When the Seminary was fully operational, there were approximately 1,600 daily vehicle trips. Additionally, Seminary traffic unloads onto Ricardo, a one lane narrow road which already gets congested with the current traffic. It cannot handle the number of cars that the project is expected to produce.

I spoke to the Fire Chief at a community meeting and asked him, "if the proposed project were built and there was an emergency and we had to leave, which way I should turn when I leave Great Circle to get out of the area". His response was to "have a good smoke mask and go to

the water because it would not be possible to get out of the area.”

Unidentified 1,000-person school: This is one of the most troubling aspects of the project. North Coast has not identified what type of school and whether the students will be required to live on campus. The type of school and the living conditions imposed on the students will have significantly different impacts on traffic. The developer’s refusal to specify what type of school makes a meaningful environmental analysis impossible.

Construction noise and number of years: The EIR says construction noise is significant and unavoidable and will exceed acceptable levels for the entire duration of the construction. The project will take years to build, significantly longer than the 4 years identified in the plan, with more realistic expectations of up to 10 years.

Senior Residential Care Center: A separate 106-unit residential care center at 70 North Knoll Road has already been approved with no public hearing. Not only does Strawberry not need another senior care center in the proposed North Coast project, with its associated visitation traffic and medical traffic, but the timing of this center being built coincident with the timing of the North Coast project construction has not been analyzed. CEQA requires this analysis.

In addition, I am opposed to the **unacceptably low number of parcel tax properties** for the number of units that are being proposed. The number of units and the accompanying structures with their occupants will add to the services needed in the Strawberry community. Inevitably, the existing parcel holders in Strawberry will have to absorb these new non-parcel tax units. This needs to be modified.

The EIR identified 13 significant, detrimental impacts. Please deny or mandate that the plan be modified so these impacts do not happen.

Respectfully,

Leslie Gardner

From: [Sammie Daniels](#)
To: [PlanningCommission](#); michellelevenson@marincounty.gov
Cc: [Stephanie MoultonPeters](#)
Subject: Strawberry community plan objections
Date: Wednesday, February 25, 2026 6:53:14 PM

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

As a resident of 414 E Strawberry Dr. MV 94941 in Strawberry, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision.

Let me say upfront: I am pro-housing. I understand Marin's obligations under state law and I support responsible development. This letter is not about stopping housing.

Traffic from this project will exceed county thresholds and cannot be mitigated. That is the conclusion of the developer's own environmental review. When 70% of Strawberry residents said 3,000 trips per day was the limit, even the smaller plan exceeded that by over 1,300 trips. **The full 337-unit plan is substantially worse.**

Two buildings of six stories each have been proposed. There are no such building of this height on the entire Strawberry peninsula.

I want to emphasize that these aren't claims from project opponents. The developer's own EIR identifies 13 significant impacts and concludes that three — traffic, greenhouse gases, and construction noise — simply cannot be mitigated. If the project's own environmental review says it causes unavoidable harm, why would we approve it without major conditions?

Increased traffic congestion on Seminary Drive and the surrounding streets will inevitably delay emergency response times. Fire trucks from the Strawberry fire station already navigate these narrow roads, all of which are only two lanes wide . When Seminary Drive traffic spills onto Reed Boulevard and Ricardo Road, every additional minute matters for a medical emergency, a structure fire, or an earthquake response. Tiburon Boulevard traffic will also be heavily congested. **The EIR does not adequately address how significantly degraded road conditions will affect the ability of first responders to reach residents in time.**

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, in addition to faculty, and staff. The educational use was approved as a residential graduate seminary where 750 students would

live on campus. North Coast is asking the county to amend these restrictions so it can build market-rate housing (rental only) and operate an undefined school. The community plan represents years of community input and democratic process. Overriding it to meet state housing quotas undermines the very concept of local planning.

I respectfully ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Robert Harvey MD
414 E Strawberry Dr. MV 94941
Strawberry, Mill Valley

Robin Fies

From: No-Reply
Sent: Thursday, February 26, 2026 9:42 AM
To: EnvPlanning
Subject: Re: Seminary Development Proposal [SENT FROM A PUBLIC FORM]

Contact Us

Email To: EnvPlanning@MarinCounty.gov

Hosted Page: <https://www.marincounty.gov/departments/cda/planning/environmental-planning>

To: Environmental Planning General Contact

From: Cindy Palumbo

Sender's Email Address: cindy.palumbo@gmail.com

Subject: Seminary Development Proposal

Message: Dear Members of the Planning Commission and Secretary Levenson,

We are Strawberry residents at 31 Heron Drive in the Strawberry neighborhood of Mill Valley. We have lived here for over 10 years and so have enjoyed living here, raising our son here and being a part of this wonderful Mill Valley community. We are out in the neighborhood every day - walking our dog along the waterway and neighborhood streets and we enter and exit the neighborhood several times a day via the only two streets in and out, as part of our normal daily living.

While we love the seminary property, this neighborhood and our lives here, we also support the need for more public housing in Marin and believe that the Seminary should be used to do its part in fulfilling Mill Valley's obligation. We also support the need for more senior care facilities in Marin and are supportive of the Seminary being used for that. But the project as currently proposed goes way beyond what we believe the neighborhood can support and we oppose approving it as is. The areas of specific concern are the undefined school and the amount of housing.

We worry about the traffic, the environmental impact, the estimates on construction and noise impact and the lack of clarity around the proposed school. The EIR identifies 13 significant environmental impacts. Three are classified as significant and unavoidable — meaning no feasible

mitigation exists. This is unacceptable.

We ask you to please take the concerns of the neighborhood and the neighborhood's independent impact analysis seriously and find a way to work with the Seminary neighborhood to respect a more desired compromise that will mitigate our concerns.

Thank you for allowing us to comment.

Bruce Randall and Cindy Palumbo
31 Heron Drive
Strawberry, Mill Valley

2026-02-26 09:37AM -0800

IP: 2601:645:b01:88d0:644e:1dfa:7b1a:3b9c

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Planning meeting re Strawberry Neighbourhood proposed project
Date: Thursday, February 26, 2026 12:38:07 PM

From: Sammie Daniels <sammie@stayitalia.com>
Sent: Wednesday, February 25, 2026 8:55 PM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Planning meeting re Strawberry Neighbourhood proposed project

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

As a resident of 414 E Strawberry Dr. MV 94941 in Strawberry, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision.

Let me say upfront: I am pro-housing. I understand Marin's obligations under state law and I support responsible development. This letter is not about stopping housing.

Traffic from this project will exceed county thresholds and cannot be mitigated. That is the conclusion of the developer's own environmental review. When 70% of Strawberry residents said 3,000 trips per day was the limit, even the smaller plan exceeded that by over 1,300 trips. The full 337-unit plan is substantially worse.

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I respectfully ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Robert Harvey MD
414 E Strawberry Dr. MV 94941
Strawberry, Mill Valley

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 12:33:15 PM

From: Justin Durack <jdurack@gmail.com>
Sent: Thursday, February 26, 2026 10:00 AM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Public Comment — Seminary at Strawberry (P1490)

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Marin County Planning Commission
c/o Michelle Levenson Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Dear Members of the Planning Commission and Secretary Levenson,

My family resides at 141 Chapel Dr, directly across the street from some of the primary proposed housing development. We know this area intimately.

First - we do not oppose housing construction at the Seminary - as a state, we need it.

However, the current proposal is clearly lacking. There are a few key issues with simple fixes, and we ask the County to enact these fixes before deciding the permanent new future of the Strawberry peninsula.

The top concern is **traffic** stemming from the undefined new school. From the EIR analysis and our own knowledge of this location, it's clear that the Strawberry roads cannot safely support a 1,000 student school (plus faculty and staff) *plus* new housing, a senior center, a memory care facility, and a gym.

Proposed fixes:

1) Require most or all housing to be **dedicated** to the school students, faculty, and staff. As currently proposed without this requirement, it would unnecessarily **double** the new traffic: Students/faculty/staff commuting in, residents commuting out (instead of just walking back/forth from homes to the school). Housing being dedicated to the Seminary is part of the Strawberry Community Plan doc, so it's always been the expectation for our local planning. We should simply maintain this requirement.

2) Reduce school size. The other lever for mitigating traffic impact on our limited ingress/egress points is to reduce the school size below 1,000 students. Since the developer has not yet disclosed what type of school will use the site, the best we can do is cap the total. If we knew more about the school, we could all have a more informed discussion on the impacts on our community. But we don't have that information, so this is perhaps the best we can do together.

3) Construction timeline. We know that noise and construction traffic will have major impacts on the community for the duration of the project development. The developer says it will take 4 years, but it seems more than likely that it will drag on long beyond that. Please require that there will be penalties that enforce a specific timeline. Otherwise we as a community have nothing to protect us from continuing to live in a major construction site for 5-10 years.

Thank you for your understanding and representation on these issues and opportunities.

Best,
Justin Durack
141 Chapel Dr
Mill Valley, CA 94941

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 12:39:22 PM

From: Mike Leyden <leyden.mj@gmail.com>
Sent: Wednesday, February 25, 2026 2:11 PM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Re: Public Comment — Seminary at Strawberry (P1490)

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am writing as a Strawberry resident and Strawberry Point Elementary parent about the Seminary at Strawberry project (P1490). I live at 354 E Strawberry Drive, in close proximity to the proposed development.

I support this project in principle. I oppose approving it without safety conditions.

As a resident, this weighs on me every day.

The curve on Reed near Ricardo is genuinely dangerous. Cars park on the inside of the turn, so there's zero visibility.

The roads children use to walk to Strawberry Point Elementary — Reed Boulevard, Ricardo Road, Richardson Drive — have no sidewalks. Children share the road with cars every single school day.

I ask the Commission to require pedestrian safety improvements before occupancy.

Conclusion

This objection is not anti-housing. It is pro-safety, pro-infrastructure, and pro-responsible planning.

Until pedestrian infrastructure is installed, fire evacuation capacity is demonstrably sufficient,

and compatibility concerns are meaningfully addressed, this development should not move forward in its current form.

I respectfully request that the Planning Commission deny or substantially revise the proposal to ensure the safety of residents—especially children—and alignment with Marin County’s long-standing planning standards.

Thank you for your consideration.

Michael Leyden
354 E Strawberry Drive
Strawberry, Mill Valley

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Public comment-Seminary@ Strawberry
Date: Thursday, February 26, 2026 12:35:21 PM

From: Jen Imbimbo <Jen.Imbimbo@MarinCounty.gov>
Sent: Thursday, February 26, 2026 9:54 AM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>; PlanningCommission <PlanningCommission@MarinCounty.gov>
Cc: Stephanie MoultonPeters <Stephanie.MoultonPeters@MarinCounty.gov>
Subject: FW: Public comment-Seminary@ Strawberry

Sharing public comment for Seminary Planning Commission meeting.

Thanks,
Jen

From: County of Marin <noreply@formresponse.com>
Sent: Wednesday, February 25, 2026 4:05 PM
To: BOS <BOS@MarinCounty.gov>
Subject: Board of Supervisors Contact Form -

Board of Supervisors Contact Form

Hosting Page: <https://www.marincounty.gov/departments/board>

Your Name: Kam Jalili

Your Email Address: kamjalili@gmail.com

Subject: Public comment-Seminary@ Strawberry

Select a Routing Method: Address

What City/Town Do You Live In? Mill Valley

Message:
February 25, 2026
Planning Commission Secretary Community
Development Agency 3501 Civic Center Drive,

Suite 308 San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry
(P1490)

My name is Kam Jalili. I live at 109 Willis Dr., Mill Valley, Ca 94941 in the Strawberry neighborhood. I live in close proximity to the former seminary property at 201 Seminary Drive. Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children. My primary concerns are traffic, construction noise, environmental impacts and pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school. The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there. I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis

including the Spirit Residential project at 70 North
Knoll

The residents of Strawberry — and especially our
children — deserve no less. Respectfully,

Kam Jalili

109 Willis Dr., Mill Valley, Ca 94941

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Public Comment-Seminary@Strawberry (P1490)
Date: Thursday, February 26, 2026 12:39:02 PM

From: Kam Jalili <kamjalili@gmail.com>
Sent: Wednesday, February 25, 2026 3:56 PM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Public Comment-Seminary@Strawberry (P1490)

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February 25, 2026

Planning Commission Secretary Community Development Agency 3501
Civic Center Drive, Suite 308 San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

My name is Kam Jalili. I live at 109 Willis Dr., Mill Valley, Ca 94941 in the Strawberry neighborhood. I live in close proximity to the former seminary property at 201 Seminary Drive. Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children. My primary concerns are traffic, construction noise, environmental impacts and pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school. The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan

showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there. I

respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less. Respectfully,

Kam Jalili

109 Willis Dr., Mill Valley, Ca 94941 Strawberry,
Mill Valley, Ca 94941

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Seminary Development [SENT FROM A PUBLIC FORM]
Date: Thursday, February 26, 2026 12:36:24 PM

From: Stephanie MoultonPeters <Stephanie.MoultonPeters@MarinCounty.gov>
Sent: Thursday, February 26, 2026 9:37 AM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Cc: Jen Imbimbo <Jen.Imbimbo@MarinCounty.gov>
Subject: Fw: Seminary Development [SENT FROM A PUBLIC FORM]

For inclusion in the public record.

Is there a Planning Commission email mailbox I should be sending this to?

Stephanie

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From: No-Reply <No-Reply@MarinCounty.gov>
Sent: Thursday, February 26, 2026 7:54:05 AM
To: Stephanie MoultonPeters <Stephanie.MoultonPeters@MarinCounty.gov>
Subject: Re: Seminary Development [SENT FROM A PUBLIC FORM]

Contact Us

Email To:	Stephanie.MoultonPeters@MarinCounty.gov
Hosted Page:	https://www.marincounty.gov/departments/board/district-3
To:	Stephanie Moulton-Peters
From:	Edward Brown
Sender's Email Address:	edwardabrown@me.com
Subject:	Seminary Development
Message:	February 26, 2026

Marin County Board of Supervisors 3501 Civic Center Drive, Suite 329 San Rafael, CA 94903

Re: Seminary at Strawberry — Request for Child Safety Protections (P1490)

Dear Supervisor Moulton-Peters,

I am writing as a Strawberry resident and parent of a student at Strawberry Point Elementary regarding the proposed Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I support responsible housing development in Marin County, and I welcome the affordable housing and senior care components of this project. However, I am deeply concerned that the project as proposed does not adequately address pedestrian and child safety on the roads our children use every day to get to school. I have two boys who walk and ride their bikes on these roads daily with their friends.

The Strawberry road network north of the fire station has essentially no sidewalks. Reed Boulevard has a blind curve near Ricardo with no visibility protection. Ricardo Road is extremely steep with no pedestrian infrastructure. East Strawberry Drive has sections with no guardrails and steep drop-offs. These are the walking and biking routes for children attending Strawberry Point Elementary and Mill Valley Middle School.

The project's own EIR identifies three significant and unavoidable impacts, and the Seminary Neighborhood Association's independent peer review found deficiencies in traffic analysis, pedestrian safety assessment, and emergency response time calculations.

The developer has also refused to identify what kind of 1,000-student school it intends to operate — making it impossible to assess the full traffic impact. When this project reaches the Board of Supervisors for final approval, I urge you to condition any approval on meaningful pedestrian safety infrastructure being completed before occupancy, and to require full analysis of the educational use and cumulative impacts with the Spirit Residential project.

Thank you for your attention to this matter. Sincerely,
Edward Brown 301 Ricardo Rd Mill Valley CA
Strawberry, Mill Valley

2026-02-26 07:51AM -0800
IP: 136.226.78.93

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Seminary Neighborhood Development Proposal
Date: Thursday, February 26, 2026 12:35:52 PM

From: Cindy Palumbo <cindy.palumbo@gmail.com>
Sent: Thursday, February 26, 2026 9:44 AM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Cc: Bruce Randall <brandallux@gmail.com>; seminaryneighbors@gmail.com <seminaryneighbors@gmail.com>
Subject: Seminary Neighborhood Development Proposal

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Dear Secretary Levenson,

We are Strawberry residents at 31 Heron Drive in the Strawberry neighborhood of Mill Valley. We have lived here for over 10 years and so have enjoyed living here, raising our son here and being a part of this wonderful Mill Valley community. We are out in the neighborhood every day - walking our dog along the waterway and neighborhood streets and we enter and exit the neighborhood several times a day via the only two streets in and out, as part of our normal daily living.

While we love the seminary property, this neighborhood and our lives here, we also support the need for more public housing in Marin and believe that the Seminary should be used to do its part in fulfilling Mill Valley's obligation. We also support the need for more senior care facilities in Marin and are supportive of the Seminary being used for that. But the project as currently proposed goes way beyond what we believe the neighborhood can support and we oppose approving it as is. The areas of specific concern are the undefined school and the amount of housing.

We worry about the traffic, the environmental impact, the estimates on construction and noise impact and the lack of clarity around the proposed school. The EIR identifies 13 significant environmental impacts. Three are classified as significant and unavoidable — meaning no feasible mitigation exists. This is unacceptable.

We ask you to please take the concerns of the neighborhood and the neighborhood's independent impact analysis seriously and find a way to work with the Seminary neighborhood to respect a more desired compromise that will mitigate our concerns.

Thank you for allowing us to comment.

Bruce Randall and Cindy Palumbo
31 Heron Drive
Strawberry, Mill Valley

From: [Michelle Levenson](#)
To: [Sindy Palencia](#)
Subject: Fw: Seminary project
Date: Thursday, February 26, 2026 12:37:43 PM

From: Suzanne DiBianca <sdibianca@salesforce.com>
Sent: Wednesday, February 25, 2026 11:02 PM
To: Michelle Levenson <Michelle.Levenson@MarinCounty.gov>
Subject: Seminary project

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February 25, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

As a resident of 381 East strawberry Drive in Strawberry, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision.

I support housing development in Marin County, including on this site. I welcome the affordable housing and senior care components. But I cannot support a project that proceeds without addressing basic pedestrian safety.

I worry about this constantly.

Strawberry isn't just absorbing the seminary project. A 106-unit senior care facility at 70 North Knoll was recently approved ministerially. Together, these projects represent an enormous increase in density and traffic for a neighborhood with no pedestrian infrastructure. The EIR should analyze their combined impact, as required under CEQA.

The EIR identifies 13 significant environmental impacts. Three are classified as significant and unavoidable — meaning no feasible mitigation exists. Traffic exceeds county thresholds. Construction noise will impact the neighborhood for years. These are the developer's own findings, not the community's allegations.

There's also the problem of north Coast claims a 1953 conditional use permit allows them to run a 1,000-student school, but they won't say what kind of school. The SNA's attorney argues the 1953 permit was superseded by a 1984 Master Plan. Even if it's valid, the original permit assumed students would live on-site, not commute. The Commission should require the developer to define this use before certifying the EIR.

Another serious issue: the EIR acknowledges that construction noise cannot be mitigated. The question is how long it lasts. The developer says 4 years. Independent estimates suggest closer to 10. For families with young children, that could mean construction trucks sharing narrow roads with kids walking to school for the better part of a decade.

There's also the problem of the developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more. The EIR identifies traffic as a significant and unavoidable impact. A community survey during the Seminary Tomorrow process found that 70% of residents said 3,000 daily trips was the maximum acceptable threshold.

Increased traffic congestion on Seminary Dr and the surrounding streets will inevitably delay emergency response times. Fire trucks from the Strawberry fire station already navigate these narrow roads. When Seminary Drive backs up and traffic spills onto Reed Boulevard and Ricardo Road, every additional minute matters for a medical emergency, a structure fire, or an earthquake response. The EIR does not adequately address how significantly degraded road conditions will affect the ability of first responders to reach residents in time.

My street will become a cut-through. When Seminary Drive is congested, GPS apps will send cars down residential streets. This isn't speculation — it's how modern navigation works. Reed, Ricardo, Richardson, Meda — all of them will see overflow traffic. And none of them have sidewalks to protect pedestrians.

The residents of Strawberry deserve a project that takes their safety seriously. I ask the Commission to require concrete safety conditions before any approval moves forward.

Do the right thing.

Suzanne DiBianca
381 East strawberry Drive
Strawberry, Mill Valley

From: [John Bruce Corcoran](#)
To: [PlanningCommission](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Planning Commission Meeting, March 2, 2026
Date: Thursday, February 26, 2026 10:02:42 AM

Bruce Corcoran
184 Great Circle Drive
Mill Valley, CA 94941

February 26, 2026

Marin County Planning Commission
Via Email: planningcommission@marincounty.gov

Re: A RESOLUTION TO RECOMMEND CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE NORTH COAST LAND HOLDINGS COMMUNITY PLAN AMENDMENT/MASTER PLAN/DESIGN REVIEW/MASTER USE PERMIT/VESTING TENTATIVE MAP/TREE REMOVAL PERMIT ON THE FORMER GOLDEN GATE BAPTIST SEMINARY PROPERTY

Dear Marin County Planning Commissioners,

I oppose the certification of the Final EIR and related Resolutions because:

- There are internal inconsistencies and vertical inconsistencies between the Countywide Plan and the 1973 Strawberry Community Plan and 1982 Amendments to the Strawberry Community Plan that may be unlawful. (See: Corcoran v County of Marin)
- The cumulative environmental and safety impacts of additional vehicular traffic on our State Highway System resulting from Marin County's Regional Housing Needs Allocation of 14,405 units has not been adequately analyzed by Marin County or Caltrans. The North Coast Land Holdings project will be a significant additional traffic contributor. Although Marin County is the lead agency for this project, Caltrans has the ultimate responsibility and authority for the State Highway System. There is no direct evidence that Caltrans has conducted a comprehensive, county-wide traffic impact analysis of all of Marin's 14,405 units. Given the geographical constraints of the Marin peninsula, southern Marin residents of Belvedere, Tiburon, Strawberry, Mill Valley, Tamalpais, and Sausalito cannot enter or exit their communities without driving on a State Highway (Highway 101, Highway 1, SR – 131 Tiburon Boulevard). Therefore, the impact of every new project will be amplified and should be analyzed comprehensively. I am attaching my letter to Caltrans for the record.
- The project is too big and has too many new land uses. North Coast Land Holdings must decide whether it wants a 1,000-student graduate institution or public housing and a senior care facility. They cannot have

all three. This is the message that the residents of Strawberry have conveyed to North Coast Land Holdings for the past 10 years, but they will not listen. Each time they return with an even bigger project. Now they are proposing three six-story buildings. Strawberry is a suburban jurisdiction. We do not deserve six-story buildings in the heart of our residential neighborhood. Those tall buildings must be eliminated. If Marin's Form Based Code applied to this project, then six-story buildings would not conform to those objective standards, and those buildings would not be approved.

Sincerely,

Bruce Corcoran

To: yunsheng.luo@dot.ca.gov

cc: LDR-D4@dot.ca.gov

Tue 2/24/2026 5:08 PM

Dear Yunsheng Luo, District Branch Chief
Senior Transportation Planner

Has Caltrans analyzed the cumulative impacts on the state highway system of 14,405 additional housing units required by Marin County's 2023 - 2031 Regional Housing Needs Assessment?

To put this additional 14,405 housing units requirement in perspective, it is more than the current existing housing units in Tiburon, Mill Valley, and Sausalito combined. In other words, the California Department of Housing and Community Development has mandated additional housing units for the equivalent of 3 new towns in Marin County over the current 8-year housing cycle.

Meanwhile, Highway 101 northbound PM Peak traffic is bumper-to-bumper now.

Given the geographical constraints of southern Marin, the residents of Belvedere, Tiburon, Strawberry, Mill Valley, Tam Valley, and Sausalito cannot enter or leave their communities without driving on a state highway (Highway 101, Highway 1, SR 131-Tiburon Boulevard). Similar geographical constraints and dependence on the state highway system exists in central and northern Marin as well (e.g., SR - 37) because Marin is a peninsula with a mountain ridge to the west, so most housing development has occurred along the Highway 101 corridor. Now the State mandate is to build even denser housing projects along that already busy corridor.

Unfortunately, the County and each individual town and city is focused primarily on meeting their own RHNA. There is very little analysis by these entities of the cumulative impacts of 14,405 additional housing units on the State Highway System.

Caltrans must have the ability to determine whether or not the State Highways in Marin can accommodate the additional capacity of vehicular traffic resulting from 14,405 new housing units, and whether or not the additional vehicular traffic would create new safety issues. If so, then I have not seen it.

Please send me any current analysis of cumulative impacts that Caltrans has performed.

I am a resident of unincorporated Strawberry in Marin County. I am currently monitoring the EIR for North Coast Land Holdings project in the heart of Strawberry, but I am also closely following many other recently announced projects along the Highway 101 corridor. I am very concerned that the cumulative impacts of Marin County's RHNA have not been analyzed adequately by the Marin County Community Development Agency or by Caltrans.

Thank you.

Sincerely,
Bruce Corcoran
184 Great Circle Drive
Mill Valley, CA 94941

From: [Jerri Meacham](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 7:30:55 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Jerri Meacham. I live at 117 Richardson Drive in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

I live near the blind curve at Richardson and Ricardo. It's horrible now and it will be 100 times more hazardous with the traffic generated by your development. There is not a sidewalk. This is just an example of the many traffic related issues that will negatively impact our neighborhood.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Jerri Meacham
117 Richardson Drive
Strawberry, Mill Valley

Sent from my iPhone

From: [Jenna Powers](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 7:38:43 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Jenna Friel. I live at 77 Bay Vista in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

[INSERT YOUR SPECIFIC SAFETY CONCERN — e.g., "The blind curve on Reed Boulevard near Ricardo is a daily hazard. My child walks past this spot every school morning. Vehicles park on the inside of the curve, reducing visibility to near zero. There is no sidewalk. With double or triple the current traffic, this is a child's life at stake."]

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

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- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Jenna Friel
77 Bay Vista
Strawberry, Mill Valley

From: [Selena Hernandez](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:11:48 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

As a resident of 155 Andersen Dr. Apt. 1205 San Rafael, CA 94901 in Strawberry, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision.

I am not opposed to development on the seminary property. Marin needs housing, and I support the affordable units in this project. What I am asking of you is that safety be a condition of approval, not an afterthought.

The Strawberry Community Plan is supposed to be the governing document for our neighborhood. It explicitly says housing on the seminary property is for students, faculty, and staff. It envisions a residential campus, not a commuter institution. The county appears willing to override these protections to meet Sacramento's housing quota. If community plans can be rewritten whenever they become inconvenient for a developer, what was the point of having them?

Reed Boulevard has a blind curve near Ricardo Road where parked cars block the sightline completely. There are no sidewalks. Children walking to school have to step into the middle of the road, unable to see oncoming traffic. This is, regrettably, already the subject of a petition signed by over 100 residents — and the development would send significantly more cars through this exact spot.

Children will be walking to school past active construction for years. The developer says 4 years. The SNA's legal counsel says it could take a decade. Either way, construction vehicles will be sharing roads that have no sidewalks with children on foot. What specific protections will be in place during school arrival and dismissal hours?

I urge the Commission to condition any approval on meaningful safety infrastructure, and to demand answers about the undefined educational use.

Sincerely,

Selena Hernandez-Cortes
155 Andersen Dr. Apt. 1205 San Rafael, CA 94901
Strawberry, Mill Valley

From: [Dana Feigenbaum](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:23:13 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is Dana Feigenbaum and I live at 230 Reed Blvd in the Strawberry neighborhood. I'm writing to submit a public comment on the Seminary at Strawberry project (P1490) before the Planning Commission.

I support building housing in Strawberry. I support the affordable and senior components of this project. What I don't support is approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

Reed Boulevard has a blind curve near Ricardo Road where parked cars block the sightline completely. There are no sidewalks. Children walking to school have to step into the middle of the road, unable to see oncoming traffic. This is already the subject of a petition signed by over 100 residents — and the development would send significantly more cars through this exact spot.

I'm also concerned about the Strawberry Community Plan is supposed to be the governing document for our neighborhood. It explicitly says housing on the seminary property is for students, faculty, and staff. It envisions a residential campus, not a commuter institution. The county appears willing to override these protections to meet Sacramento's housing quota. If community plans can be rewritten whenever they become inconvenient for a developer, what was the point of having them?

There are no sidewalks on Reed Boulevard, Ricardo Road, Richardson Drive, or Meda Lane. These are the streets our kids walk on to get to school. The developer's plan includes pedestrian-friendly streets inside the 127-acre property, but nothing on the surrounding neighborhood roads where children are actually walking.

I hope the Commission will take these concerns seriously and attach meaningful conditions to any approval. Infrastructure and safety must come before occupancy.

With respect,

Dana Feigenbaum
230 Reed Blvd
Strawberry, Mill Valley

Sent from my iPhone

From: [Stefanie Schoen](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:25:38 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

I have 3 kids that are encouraged to 'walk and roll' to school... how can I feel that they are safe when the infrastructure to support this is already fragile?

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 283 Ricardo Road in Strawberry, and a parent of children who attend Strawberry Point and MVMS. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Drive.

I support building housing in Strawberry. I support the affordable and senior components of this project. What I don't support is approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

I worry about this constantly.

The numbers speak for themselves. The seminary at peak operation generated about 1,600 daily trips. The current Olivet tenancy produces roughly 2,300. The proposed project would push that well beyond 4,300 daily trips — on the same narrow roads with no sidewalks. The EIR admits this impact is significant and unavoidable.

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, faculty, and staff. The educational use was approved as a residential graduate seminary where students would live on campus. North Coast is asking the county to amend these restrictions so it can build market-rate housing and operate an undefined school. The community plan represents years of community input and democratic process. Overriding it to meet state housing quotas undermines the very concept of local planning.

Walk any school-route street in upper Strawberry and you'll see the problem immediately. No sidewalks on Reed. No sidewalks on Ricardo. No sidewalks on Richardson. Children walk in the road, every day. The developer's "Complete Streets" plan stops at their property line. The streets our kids actually use get nothing.

The EIR acknowledges that construction noise cannot be mitigated. The question is how long it lasts. The developer says 4 years. Independent estimates suggest closer to 10. For families with young children, that could mean construction trucks sharing narrow roads with kids walking to school for the better part of a decade.

The residents of Strawberry deserve a project that takes their safety seriously. I ask the Commission to require concrete safety conditions before any approval moves forward.

Do the right thing. To elaborate further:

Stefanie Schoen
283 Ricardo Road
Strawberry, Mill Valley

Sent from my iPhone

From: [Nurite Regev](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:26:40 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Nurite Regev. I live at 344 E Strawberry Drive in the Strawberry neighborhood with my family. I live in close proximity to the former seminary property at 201 Seminary Drive.

To be clear: I am opposed to the amount of housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

One concern is pedestrian and cyclist safety, but there are other concerns too. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

The blind curve on Reed Boulevard near Ricardo is a daily hazard. Children walk past this spot every school morning. Vehicles park on the inside of the curve, reducing visibility to near zero. There is no sidewalk. With double or triple the current traffic, this is a child's life at stake.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Nurite Regev
L.nuriteregev@gmail.com
Strawberry, Mill Valley

All my best,

Nurite

From: [Alexandra Norris](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:31:07 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is Alexandra Norris. I live at 378 E Strawberry Drive in Strawberry.. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I support building housing in Strawberry. I support the affordable and senior components of this project. What I don't support is approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

The county's own 684-page Environmental Impact Report — paid for by the developer — identifies 13 significant environmental impacts, three of which cannot be mitigated: traffic, greenhouse gas emissions, and construction noise. When the developer's own analysis says the impacts can't be fixed, that should give the Commission serious pause.

Another serious issue: the developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more. The EIR identifies traffic as a significant and unavoidable impact. A community survey during the Seminary Tomorrow process found that 70% of residents said 3,000 daily trips was the maximum acceptable threshold.

The EIR acknowledges that construction noise cannot be mitigated. The question is how long it lasts. The developer says 4 years. Independent estimates suggest closer to 10. For families with young children, that could mean construction trucks sharing narrow roads with kids walking to school for the better part of a decade.

Why does construction need to happen 6 days a week? They are saying it will be 4-10 years and we know that it will most likely be more than that. The county allows for noise on Saturdays but even 5+ years of construction noise 6 days a week will definitely have a negative impact on all neighbors' lives and mental health.

When the seminary was approved, the community plan made clear that housing on the property would be exclusively for students, faculty, and staff — and that the school would be a residential graduate seminary. These weren't vague guidelines; they were binding conditions. The developer is now asking the county to rewrite the community plan to accommodate a completely different use. The residents of Strawberry should not have their community plan gutted to serve a developer's profit motive, regardless of state housing mandates.

On top of the 337 housing units, the developer claims the right to operate a 1,000-student educational institution under a disputed 1953 permit — but refuses to say what kind. A residential seminary generates minimal external traffic. A commuter college could add thousands more daily trips that aren't in any traffic analysis. You can't do a

meaningful environmental review of a school when you don't know what it is.

Our house will be directly impacted by the construction of the 6 story building intended for senior living use. It is 3 stories higher than the original plan submitted and will be a huge building towering over the houses on East Strawberry Drive. The developers have been dishonest since their purchase of the property and have completely disregard the impact on the residential neighborhood. The massive structure will be a towering nuisance that will invade all neighbors' privacy and well being. We encourage the owners to reconsider the size and height.

Thank you for your time.

Alexandra and Philip Norris
378 E Strawberry Drive
Strawberry, Mill Valley

From: [Samantha Monge](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:36:39 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Samantha monge. I live at 312 ricardo road mill valley ca 94941 in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

I live and work here in Strawberry in fact, I work on the seminary campus at the French immersion Le Petit Jardin school. The Preschool has been there for a couple years. It's a huge part of a community and we are an essential part of a community a huge build like this would create a huge amount of noise, pollution and more stress for the parents that use our school and drive to and fro daily to have the open space and be able to walk there with small children and show them. Nature, - birds, flowers, moss , snails, lizards,mushrooms , red tail hawks this is Marin..... this is building blocks to creating a soft, reflective environmentist. This is an essential part of childhood in Marin, that accessibility and lesson. All of this would be ruined. There is a video on next-door from one of the fathers at the French immersion preschool, taking a video of a bald eagle soaring above the seminary campus. It's spectacular this nook and nature is spectacular. If you allow this, it will all disappear. I fought against Branson, moving here and in fact, I went to the Branson school from 1993 to 1997. They were also my largest flower client. I did the graduations and board member teas when I stood up at the seminary and fought against Branson and said that they were the community and institution that taught me what the word community meant. They were the school that taught me what ecosystem was to love and preserve this earth the Branson that attempted to move into the seminary is not the Branson. I knew. they failed three times. This project is worse. The numbers are worse. The hidden agendas and innuendos are worse. We want Strawberry to remain safe and peaceful for humans and birds.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Samantha monge
312 ricardo road mill valley ca 94941
Strawberry, Mill Valley

Sent from my iPad

From: [Cecile Picard](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:45:58 AM

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February 26, 2026 Marin County Planning Commission c/o Michelle Levenson, Planning Commission Secretary Community Development Agency 3501 Civic Center Drive, Suite 308 San Rafael, CA 94903 Re: Public Comment — Seminary at Strawberry (P1490) Dear Members of the Planning Commission and Secretary Levenson, As a teacher at Le Petit Jardin in Strawberry living at 570 28th Avenue apt 3 San Francisco 94121, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision. I'm not opposed to development on the seminary property. Marin needs housing, and I support the affordable units in this project. What I'm asking for is that safety be a condition of approval, not an afterthought. I want to speak for the residents who don't have kids in the local schools but are equally affected. Cyclists use these streets regularly. None of us have sidewalks to walk on. The safety issue here isn't limited to school hours — it's a 7-days-a-week, all-hours problem for anyone who gets around on foot or by bike in this neighborhood. Even the compromise plan that the developer rejected would have generated over 4,300 daily vehicle trips. The 337-unit plan is worse. Traffic is one of three impacts the EIR says cannot be mitigated at all. On streets that already can't safely handle the current volume of cars and pedestrians together. My street will become a cut-through. When Seminary Drive is congested, GPS apps will send cars down residential streets. This isn't speculation — it's how modern navigation works. Reed, Ricardo, Richardson, Meda — all of them will see overflow traffic. And none of them have sidewalks to protect pedestrians. Another serious issue: anyone who has walked Reed Boulevard near Ricardo Road knows how dangerous it is. The blind curve, combined with street parking and no sidewalks, forces pedestrians into the travel lane with no way to see what's coming. Over 100 residents signed a petition about this intersection before this project was even proposed. Walk any school-route street in upper Strawberry and you'll see the problem immediately. No sidewalks on Reed. No sidewalks on Ricardo. No sidewalks on Richardson. Children walk in the road, every day. The developer's "Complete Streets" plan stops at their property line. The streets our kids actually use get nothing. Please ensure that pedestrian safety is not treated as optional. The Commission has the authority to require real protections — I'm asking you to use it. Respectfully, Cecile Picard 570 28th Avenue apt 3 San Francisco 94121

From: [Christine Mascott](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:05:07 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

I walk with my dog every morning in the seminary.

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

As a resident of 244 Ricardo Rd in Strawberry, I want to share my concerns about the Seminary at Strawberry development before the Commission makes its decision.

I'm not opposed to development on the seminary property. Marin needs housing, and I support the affordable units in this project. What I'm asking for is that safety be a condition of approval, not an afterthought.

On top of the 337 housing units, the developer claims the right to operate a 1,000-student educational institution under a disputed 1953 permit — but refuses to say what kind. A residential seminary generates minimal external traffic. A commuter college could add thousands more daily trips that aren't in any traffic analysis. You can't do a meaningful environmental review of a school when you don't know what it is.

I want to speak for the residents who don't have kids in the local schools but are equally affected. My kids walked to Strawberry point school for years. I walk my dog on these roads every day. My elderly neighbors go for daily walks on Reed and Ricardo. Cyclists use these streets regularly. None of us have sidewalks to walk on. The safety issue here isn't limited to school hours — it's a 7-days-a-week, all-hours problem for anyone who gets around on foot or by bike in this neighborhood.

I hope the Commission will take these concerns seriously and attach meaningful conditions to any approval. Infrastructure and safety must come before occupancy.

With respect,

Christine Mascott
244 Ricardo Rd
Strawberry, Mill Valley

From: [Danielle Lavee-Dixon](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:05:43 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

My 7 year old plays with her friends in the neighborhood

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I'm a m resident at 63 Shelley Dr. I walk, bike, and drive these roads daily. I'm writing to comment on the Seminary at Strawberry project (P1490) because this development will fundamentally change the safety of our neighborhood streets.

I welcome new neighbors. Housing development on the seminary property makes sense. What doesn't make sense is adding thousands of daily vehicle trips to roads with no sidewalks and calling it safe. I support this project — with real safety conditions.

My kids attend Strawberry Point School. It's easy to focus on children's safety, and that matters enormously. But Strawberry's pedestrian problem is broader than that. Seniors who walk for exercise, dog walkers, joggers, recreational cyclists — everyone who uses these roads on foot or on a bike is at risk. There are no sidewalks on Reed, Ricardo, Richardson, or Meda. Doubling or tripling the traffic volume makes every one of these streets more dangerous for every pedestrian, every day of the week.

There are no sidewalks on Reed Boulevard, Ricardo Road, Richardson Drive, or Meda Lane. These are the streets our kids walk on to get to school. The developer's plan includes pedestrian-friendly streets inside the 127-acre property, but nothing on the surrounding neighborhood roads where children are actually walking.

My street will become a cut-through. When Seminary Drive is congested, GPS apps will send cars down residential streets. This isn't speculation — it's how modern navigation works. Reed, Ricardo, Richardson, Meda — all of them will see overflow traffic. And none of them have sidewalks to protect pedestrians.

I respectfully ask the Commission to require pedestrian safety improvements before any units are occupied, and to require full analysis of the educational use before certifying the EIR.

Thank you for your consideration.

Danielle Dixon
63 Shelley Dr
Strawberry, Mill Valley

From: [Allen Kleiman](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:16:28 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I live at 149 Chapel Dr in the Strawberry neighborhood. I'm writing about the proposed development at 201 Seminary Drive (P1490) because it will directly affect the safety of our community. As someone who has lived here for years, I've watched conditions on these streets deteriorate even before any new development.

I've lived in Strawberry for years and I welcome new neighbors. Housing development on the seminary property makes sense. What doesn't make sense is adding thousands of daily vehicle trips to roads with no sidewalks and calling it safe. I support this project — with real safety conditions.

The EIR acknowledges that construction noise cannot be mitigated. The question is how long it lasts. The developer says 4 years. Independent estimates suggest closer to 10. For families with young children, that could mean construction trucks sharing narrow roads with kids walking to school for the better part of a decade.

Even the compromise plan that the developer rejected would have generated over 4,300 daily vehicle trips. The 337-unit plan is worse. Traffic is one of three impacts the EIR says cannot be mitigated at all. On streets that already can't safely handle the current volume of cars and pedestrians together.

I'm also concerned about my street will become a cut-through. When Seminary Drive is congested, GPS apps will send cars down residential streets. This isn't speculation — it's how modern navigation works. Reed, Ricardo, Richardson, Meda — all of them will see overflow traffic. And none of them have sidewalks to protect pedestrians. Let me explain why this matters.

The residents of Strawberry deserve a project that takes their safety seriously. I ask the Commission to require concrete safety conditions before any approval moves forward.

Thank you for your time.

Allen Kleiman
149 Chapel Dr
Strawberry, Mill Valley

Sent from my iPhone

From: [Carsten Kristensen](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:34:57 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Carsten Kristensen. I live at cdammk@icloud.com in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

I bicycle around the neighborhood every morning, 6 days a week, passing by Strawberry Point School. Even now there's a lot of traffic at that intersection. I cannot envision what it would be like if an additional 1,000 students were to drive past on their way to a new school out at the seminary; It would be insane!

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Carsten Kristensen
cdammk@icloud.com
Strawberry, Mill Valley

From: [John Bilmont](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#); [Rhonda Slade](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:43:57 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

My name is John Bilmont. I have lived for 25 years at 137 Richardson Dr. in Strawberry and I'm a daily pedestrian in this neighborhood. I'm submitting this public comment on the Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I support building housing in Strawberry. I don't support approving a massive development without requiring the pedestrian safety infrastructure our neighborhood needs first.

Reed Boulevard has a blind curve near Ricardo Road where parked cars block the sightline completely. There are no sidewalks. Children walking to school have to step into the middle of the road, unable to see oncoming traffic. This is already the subject of a petition signed by over 100 residents — and the development would send significantly more cars through this exact spot.

The developer won't identify what type of 1,000-student school it plans to operate. This matters enormously for traffic. A residential campus is very different from a commuter institution. The current EIR doesn't model the traffic from a commuter school because the developer won't disclose the plan. This is a blank check for an undefined use with potentially massive impacts.

The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more. The EIR identifies traffic as a significant and unavoidable impact. A community survey during the Seminary Tomorrow process found that 70% of residents said 3,000 daily trips was the maximum acceptable threshold.

Strawberry isn't just absorbing the seminary project. A 106-unit senior care facility at 70 North Knoll was recently approved ministerially. Together, these projects represent an enormous increase in density and traffic for a neighborhood with no pedestrian infrastructure. The EIR should analyze their combined impact, as required under CEQA.

I'm also concerned about the EIR proposes mitigation at the Seminary Drive intersection, but what happens when that intersection congests and Waze sends drivers through the neighborhood? Reed Boulevard, Richardson Drive, Meda Lane — these become de facto arterials. Has this diversion been modeled? These are school walking routes.

My concerns are simple: the roads between the seminary property and Strawberry Point Elementary have no sidewalks. Not some of them — none of them. Reed, Ricardo, Richardson, Meda. Kids walk in the street. The project proposes to massively increase traffic on these roads without building a single foot of sidewalk outside the

property boundary.

I'm also concerned about the county's own 684-page Environmental Impact Report — paid for by the developer — identifies 13 significant environmental impacts, three of which cannot be mitigated: traffic, greenhouse gas emissions, and construction noise. When the developer's own analysis says the impacts can't be fixed, that should give the Commission serious pause.

The EIR acknowledges that construction noise cannot be mitigated. The question is how long it lasts. The developer says 4 years. Independent estimates suggest closer to 10. For families with young children, that could mean construction trucks sharing narrow roads with kids walking to school for the better part of a decade.

I want to speak for the residents who don't have kids in the local schools but are equally affected. I walk my dogs on these roads every day. My elderly neighbors go for daily walks on Reed and Ricardo. Cyclists use these streets regularly. None of us have sidewalks to walk on. The safety issue here isn't limited to school hours — it's a 7-days-a-week, all-hours problem for anyone who gets around on foot or by bike in this neighborhood.

There is a fire station on Reed Boulevard. When traffic on Seminary Drive quadruples, the surrounding streets will clog — including the very roads that fire trucks and ambulances use to reach homes in upper Strawberry. The SNA's independent peer review flagged deficiencies in the EIR's emergency response time analysis. This isn't theoretical. Delayed emergency response costs lives.

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, faculty, and staff. The educational use was approved as a residential graduate seminary where students would live on campus. North Coast is asking the county to amend these restrictions so it can build market-rate housing and operate an undefined school. The community plan represents years of community input and democratic process. Overriding it to meet state housing quotas undermines the very concept of local planning.

I urge the Commission to condition any approval on meaningful safety infrastructure, and to demand answers about the undefined educational use.

Sincerely,

JOHN BILMONT
137 RICHARDSON DR. MILL VALLEY, CA 94941
Strawberry, Mill Valley

From: [Meme Hurd](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:44:18 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I'm a Strawberry resident at 223 Reed Blvd , Mill Valley (Strawberry) 94941. I walk, bike, and drive these roads daily.

I support housing on this site. But safety has to come first.

The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips — and that plan was rejected in favor of the larger 337-unit version. The full project will generate even more.

Anyone who has walked Reed Blvd near Ricardo Road knows how dangerous it is. The blind curve, combined with street parking and no sidewalks, forces pedestrians into the travel lane with no way to see what's coming.

Thank you.

Marjorie Hurd
223 Reed Blvd , Mill Valley (Strawberry) 94941
Strawberry, Mill Valley

Sent from my iPhone

From: [Doug Montgomery](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:54:32 AM

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Dear Members of the Planning Commission and Secretary Levenson,

I'm writing as a Strawberry resident and Tamalpais High School parent about the Seminary at Strawberry project (P1490). I live at 293 Ricardo Road, in close proximity to the proposed development. I have lived in this neighborhood for many years and have seen traffic and safety conditions steadily worsen.

This is not a letter opposing housing. I believe Marin needs more homes and I welcome development on this site. But the scale of this project demands that basic safety infrastructure be built before — not after — residents move in.

This keeps me up at night.

Even the compromise plan that the developer rejected would have generated over 4,300 daily vehicle trips. The 337-unit plan is worse. Traffic is one of three impacts the EIR says cannot be mitigated, which stunned me at all. On streets that already can't safely handle the current volume of cars and pedestrians together.

The EIR proposes mitigation at the Seminary Drive intersection, but what happens when that intersection congests and Waze sends drivers through the neighborhood? Reed Boulevard, Richardson Drive, Meda Lane — these become de facto arterials. Has this diversion been modeled? These are school walking routes.

A separate 106-unit residential care center at 70 North Knoll Road has already been approved ministerially in Strawberry — with no public hearing. The cumulative traffic and infrastructure impact of both projects on the same constrained road network needs to be analyzed together. CEQA requires this kind of cumulative analysis.

There is a blind curve on Reed Boulevard that children navigate on foot every school day. No sidewalk, no mirror, no signage. Cars parked on the inside of the curve eliminate any sightline. The county knows about this — more than 100 residents have petitioned for improvements. None have been made, and the project would dramatically increase traffic here.

I urge the Commission to condition any approval on meaningful safety infrastructure, and to demand answers about the undefined educational use.

Sincerely,

Doug Montgomery
293 Ricardo Road
Strawberry, Mill Valley

Sent from my iPhone

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From: [Meka Asonye](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:55:04 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Meka Asonye. I live at 145 chapel drive, mill valley ca 94941 in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

The traffic in an emergency will not allow adequate evacuation

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,

Meka Asonye
145 chapel drive, mill valley ca 94941
Strawberry, Mill Valley

From: [John Bilmont](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#); [Rhonda Slade](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:55:26 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I'm a Strawberry resident at 137 Richardson Drive, Mill Valley, CA 94941 for 25 years. I walk, walk my dogs, and drive these roads daily. I'm writing to comment on the Seminary at Strawberry project (P1490) because this development will fundamentally change the health and safety, air quality and drainage of our neighborhood streets.

I'm opposed the scale of the development on the seminary property.

There is a blind curve on Reed Boulevard that children navigate on foot every school day. No sidewalk, no mirror, no signage. Cars parked on the inside of the curve eliminate any sightline. The county knows about this — more than 100 residents have petitioned for improvements. None have been made, and the project would dramatically increase traffic here.

This isn't just about children walking to school. Strawberry is a neighborhood where people walk their dogs, go for runs, ride bikes, and enjoy being outdoors on foot. Seniors in our community rely on being able to walk safely on these roads. None of these streets have sidewalks. Adding thousands of daily vehicle trips without pedestrian infrastructure puts every person on foot at risk — not just during school hours, but all day long.

I don't think enough attention has been paid to what this level of traffic increase means for emergency services. If Seminary Drive is backed up and Reed, Ricardo, and East Strawberry are full of cut-through traffic, how quickly can a fire engine or ambulance reach a home on Richardson Drive or Meda Lane? Has anyone modeled emergency response times under the projected traffic conditions? The peer review suggests the EIR's analysis on this point was inadequate.

The EIR acknowledges that construction noise cannot be mitigated. The question is how long it lasts. The developer says 4 years. Independent estimates suggest closer to 10. For families with young children, that could mean construction trucks sharing narrow roads with kids walking to school for the better part of a decade.

A separate 106-unit residential care center at 70 North Knoll Road has already been approved ministerially in Strawberry — with no public hearing. The cumulative traffic and infrastructure impact of both projects on the same constrained road network needs to be analyzed together. CEQA requires this kind of cumulative analysis.

My street will become a cut-through. When Seminary Drive is congested, GPS apps will send cars down residential streets. This isn't speculation — it's how modern navigation works. Reed, Ricardo, Richardson, Meda — all of them will see overflow traffic. And none of them have sidewalks to protect pedestrians.

Another serious issue: i want to emphasize that these aren't claims from project opponents. The developer's own EIR identifies 13 significant impacts and concludes that three — traffic, greenhouse gases, and construction noise — simply cannot be mitigated. If the project's own environmental review says it causes unavoidable harm, why would we approve it without major conditions?

Another serious issue: the developer won't identify what type of 1,000-student school it plans to operate. This matters enormously for traffic. A residential campus is very different from a commuter institution. The current EIR doesn't model the traffic from a commuter school because the developer won't disclose the plan. This is a blank check for an undefined use with potentially massive impacts.

Another serious issue: even the compromise plan that the developer rejected would have generated over 4,300 daily vehicle trips. The 337-unit plan is worse. Traffic is one of three impacts the EIR says cannot be mitigated at all. On streets that already can't safely handle the current volume of cars and pedestrians together.

I'm also concerned about the Strawberry Community Plan is supposed to be the governing document for our neighborhood. It explicitly says housing on the seminary property is for students, faculty, and staff. It envisions a residential campus, not a commuter institution. The county appears willing to override these protections to meet Sacramento's housing quota. If community plans can be rewritten whenever they become inconvenient for a developer, what was the point of having them?

I urge the Commission to condition any approval on meaningful safety infrastructure, and to demand answers about the undefined educational use.

Sincerely,

Rhonda Slade
137 Richardson Drive, Mill Valley, CA 94941
Strawberry, Mill Valley

From: [Brad Brennan](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:56:02 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 304 Ricardo Rd in Strawberry. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Road.

This is not a letter opposing housing. I believe Marin needs more homes and I welcome development on this site. But the scale of this project demands that basic safety infrastructure be built before — not after — residents move in.

As a resident, this weighs on me every day.

The curve on Reed near Ricardo is genuinely dangerous. Cars park on the inside of the turn, so there's zero visibility. Kids walk in the road because there's no sidewalk. I've seen near-misses. Adding hundreds more daily vehicle trips through here without fixing this is reckless.

North Coast claims a 1953 conditional use permit allows them to run a 1,000-student school, but they won't say what kind of school. The SNA's attorney argues the 1953 permit was superseded by a 1984 Master Plan. Even if it's valid, the original permit assumed students would live on-site, not commute. The Commission should require the developer to define this use before certifying the EIR.

I'm also concerned about when Seminary Drive backs up — and it will — navigation apps will route drivers onto Reed Boulevard, Ricardo Road, East Strawberry Drive, and other residential streets. These are narrow roads with no sidewalks where children walk. It's unclear whether this diversion has even been modeled in the EIR. If it hasn't, the traffic analysis is fundamentally incomplete.

Construction noise is one of the three significant and unavoidable impacts identified in the EIR. The developer estimates a 4-year timeline. The SNA's attorney calls this unrealistic and suggests a decade is more likely. That means construction vehicles on school walking routes for potentially the entire duration of a child's K-8 years in Strawberry schools.

Another serious issue: even the compromise plan that the developer rejected would have

generated over 4,300 daily vehicle trips. The 337-unit plan is worse. Traffic is one of three impacts the EIR says cannot be mitigated at all. On streets that already can't safely handle the current volume of cars and pedestrians together.

The Strawberry Community Plan — adopted in 1973 and amended in 1982 — specifically restricts housing on the seminary property to students, faculty, and staff. The educational use was approved as a residential graduate seminary where students would live on campus. North Coast is asking the county to amend these restrictions so it can build market-rate housing and operate an undefined school. The community plan represents years of community input and democratic process. Overriding it to meet state housing quotas undermines the very concept of local planning.

I'm also concerned about i don't think enough attention has been paid to what this level of traffic increase means for emergency services. If Seminary Drive is backed up and Reed, Ricardo, and East Strawberry are full of cut-through traffic, how quickly can a fire engine or ambulance reach a home on Richardson Drive or Meda Lane? Has anyone modeled emergency response times under the projected traffic conditions? The peer review suggests the EIR's analysis on this point was inadequate.

This isn't just about children walking to school. Strawberry is a neighborhood where people walk their dogs, go for runs, ride bikes, and enjoy being outdoors on foot. Seniors in our community rely on being able to walk safely on these roads. None of these streets have sidewalks. Adding thousands of daily vehicle trips without pedestrian infrastructure puts every person on foot at risk — not just during school hours, but all day long.

I hope the Commission will take these concerns seriously and attach meaningful conditions to any approval. Infrastructure and safety must come before occupancy.

With respect,

Brad Brennan
304 Ricardo Rd
Strawberry, Mill Valley

Brad Brennan | Director of Major Accounts

brad@rakenapp.com

Direct: [\(858\) 314-9273](tel:(858)314-9273)



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From: [Deirdre Fennessy](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 10:05:39 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Deirdre Fennessy. I live at 10 Milland Dr. Apt D 5 in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

[INSERT YOUR SPECIFIC SAFETY CONCERN — e.g., "The blind curve on Reed Boulevard near Ricardo is a daily hazard. My child walks past this spot every school morning. Vehicles park on the inside of the curve, reducing visibility to near zero. There is no sidewalk. With double or triple the current traffic, this is a child's life at stake."]

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,
Deirdre Fennessy
10 Milland Dr. Apt D 5
Strawberry, Mill Valley

From: [Corrie Scott](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 10:14:26 AM

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February 26, 2026

Marin County Planning Commission
c/o Michelle Levenson, Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

My 5 year old and I will be walking to strawberry point elementary from Richardson Dr. I already have an issue with cars not stopping at the Ricardo Ln and Richardson Dr intersection and this additional traffic and driver's selfishness is going to make matters worse for my families safety.

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Planning Commission and Secretary Levenson,

I am a resident of 217 Richardson Dr. in Strawberry. I am writing regarding the proposed Seminary at Strawberry development at 201 Seminary Drive. As someone who has lived here for years, I've watched conditions on these streets deteriorate even before any new development.

I am pro-housing. I understand Marin's obligations under state law and I support responsible development. This letter is not about stopping housing. It is about ensuring that infrastructure keeps pace with density.

The EIR proposes mitigation at the Seminary Drive intersection, but what happens when that intersection congests and Waze sends drivers through the neighborhood? Reed Boulevard, Richardson Drive, Meda Lane — these become de facto arterials. Has this diversion been modeled? These are school walking routes.

This isn't just about children walking to school. Strawberry is a neighborhood where people walk their dogs, go for runs, ride bikes, and enjoy being outdoors on foot. Seniors in our community rely on being able to walk safely on these roads. None of these streets have sidewalks. Adding thousands of daily vehicle trips without pedestrian infrastructure puts every person on foot at risk — not just during school hours, but all day long.

Even the compromise plan that the developer rejected would have generated over 4,300 daily vehicle trips. The 337-unit plan is worse. Traffic is one of three impacts the EIR says cannot be mitigated at all. On streets that already can't safely handle the current volume of cars and pedestrians together.

When the seminary was approved, the community plan made clear that housing on the property would be exclusively for students, faculty, and staff — and that the school would be a residential graduate seminary. These weren't vague guidelines; they were binding conditions. The developer is now asking the county to rewrite the community plan to accommodate a completely different use. The residents of Strawberry should not have their community plan gutted to serve a developer's profit motive, regardless of state housing mandates.

Anyone who has walked Reed Boulevard near Ricardo Road knows how dangerous it is. The blind curve, combined with street parking and no sidewalks, forces pedestrians into the travel lane with no way to see what's coming. Over 100 residents signed a petition about this intersection before this project was even proposed.

The Commission must condition any approval on meaningful safety infrastructure, and to demand answers about the undefined educational use.

Sincerely,

Corrie Scott
217 Richardson Dr
Strawberry, Mill Valley

Sent from my iPhone

From: [Joe Finci](#)
To: [Stephanie MoultonPeters](#); [PlanningCommission](#); [Michelle Levenson](#)
Subject: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:50:59 AM

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February 26, 2026

Stephanie Moulton-Peters, Marin County Board of Supervisors
Planning Commission Secretary Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

My name is Joe Finci. I live at 609 Seminary Drive, Mill Valley, Ca 94941 and I am writing regarding the proposed project at the seminary property in Strawberry which is scheduled to be discussed on Mon March 2 at the Planning Commission meeting.

As a neighbor of this project who will be directly impacted, I am not opposed to housing as part of this project. Marin County has housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. My opposition to the project comes from its scale which I am sure other neighbors will address in more detail. My main concern and reason for this email is to address the inadequate analysis of traffic and associated safety concerns, and their impacts on the community, particularly with regard to daily traffic.

The project would introduce a substantial increase in daily vehicle trips. Based on information we have been provided, this increase will be about three times the current amount of daily trips. Not only will the daily trips increase substantially but this will be happening to a roadway system that is already strained during peak commute hours. None of our main arteries – Seminary Drive, Strawberry Drive, and adjacent residential streets – were designed to accommodate high-

volume traffic and there is no way to make them accommodate more cars. These roads are narrow, lack adequate shoulders in several locations, and serve as shared corridors for vehicles, cyclists, and pedestrians.

Also concerning are the intersections connecting Seminary Drive and East Strawberry Drive to Tiburon Boulevard and the U.S. 101 on- and off-ramps. These intersections already experience congestion and challenging turning movements during peak periods. Adding thousands of additional daily trips—particularly commuter trips—will exacerbate delay, increase collision risk, and create spillover congestion into nearby residential neighborhoods. These have not been addressed satisfactorily in the Environmental Impact Report (EIR).

In addition to daily congestion, emergency evacuation must be considered. Strawberry has limited ingress and egress routes. During wildfire or other emergency scenarios, increased density and vehicle load could materially impair evacuation timing and public safety. Increased traffic will directly affect cyclists and pedestrians who regularly use Seminary and East Strawberry Drives. There are also the students and families of Strawberry Point Elementary School to consider, especially with many kids walking to school. The project must not compromise the safety of vulnerable road users.

For these reasons, I urge the County to require substantial reductions in project intensity or to reconsider approval until a traffic solution that genuinely protects public safety and neighborhood livability is achieved.

Stephanie – when you ran for office to be our District 3 Supervisor, we valued the attention you gave to our neighbors regarding the importance of this seminary project being developed in the best interests of the community. As you recall, this was a huge topic of discussion back then and you took the time to attend a number of meetings about it. We hope we can count on you to help do what is best for this community knowing that a project will be approved but it needs to be the right one both for the current and the future neighbors.

Thank you for your consideration.

Sincerely,

Joe Finci
609 Seminary Drive
Mill Valley, Ca 94941

Joe Finci
EZ Auto Solutions

818-623-8148 (office)
818-301-0452 (fax)

www.ezautosolutions.com

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From: [Audrey Finci](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Cc: [Stephanie MoultonPeters](#)
Subject: Re: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 8:41:27 AM

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February 26, 2026

Planning Commission Secretary Community Development Agency 3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

My name is Audrey Finci. I live at 609 Seminary Drive, Mill Valley, Ca 94941 in the Strawberry neighborhood. I live near the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on the Seminary at Strawberry site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the community, particularly regarding the traffic and circulation impacts associated with the development. The project would introduce a substantial increase in daily vehicle trips onto a roadway network that is already strained during peak commute hours. Seminary Drive, Strawberry Drive, and adjacent residential streets were not designed to accommodate high-volume traffic. These roads are narrow, lack adequate shoulders in several locations, and serve as shared corridors for vehicles, cyclists, and pedestrians. Also concerning are the intersections connecting Seminary Drive to Tiburon Boulevard and the U.S. 101 on- and off-ramps. These intersections already experience congestion and challenging turning movements during peak periods. Adding thousands of additional daily trips—particularly commuter trips—will exacerbate delay, increase collision risk, and create spillover congestion into nearby residential neighborhoods. The Environmental Impact Report identifies vehicle miles traveled (VMT) impacts as significant and unavoidable. This finding alone warrants serious reconsideration of the project's scale and intensity. Traffic impacts at this location are difficult to mitigate due to physical roadway constraints, proximity to the freeway interchange, and limited road-widening capacity. In addition to daily congestion, emergency evacuation must be considered. Strawberry has limited ingress and egress routes. During wildfire or other emergency scenarios, increased density and vehicle load could materially impair evacuation timing and public safety. Finally, increased traffic will directly affect cyclists and pedestrians who regularly use Seminary Drive. The project must not compromise the safety of vulnerable road users.

For these reasons, I urge the County to require substantial reductions in project intensity or to reconsider approval until a traffic solution that genuinely protects public safety and neighborhood livability is achieved.

Thank you for your consideration.

Sincerely,

Audrey Finci 609 Seminary Drive, Mill Valley, Ca 94941 Strawberry, Mill Valley

From: [Nicki Asonye](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Subject: Re: Public Comment — Seminary at Strawberry (P1490)
Date: Thursday, February 26, 2026 9:53:59 AM

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February 26, 2026

Planning Commission Secretary
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Public Comment — Seminary at Strawberry (P1490)

Dear Members of the Marin County Planning Commission,

My name is Nicole Asonye. I live at 145 Chapel Drive, Mill Valley in the Strawberry neighborhood with my family, including children who attend Strawberry Point Elementary. I live in close proximity to the former seminary property at 201 Seminary Drive.

Let me be clear: I am not opposed to housing on this site. I understand Marin County's housing obligations, and I support responsible development that includes affordable units, senior housing, and community amenities. What I am opposed to is a project of this scale proceeding without adequate analysis of its impact on the safety of our children.

My primary concern is pedestrian and cyclist safety. The streets in Strawberry north of the fire station — Reed Boulevard, Ricardo Road, East Strawberry Drive — have no sidewalks, no bike lanes, steep grades, blind curves, and limited sight lines. These are the roads our children walk and bike on every day to get to school.

I have a 3 year old and a 3 day old that will be playing in the neighborhood for years and need safe sidewalks.

The EIR identifies 13 significant environmental impacts — three of which cannot be mitigated at all. The developer's own traffic study for the smaller 234-unit plan showed 4,323 daily vehicle trips. The full 337-unit plan generates even more. Meanwhile, the developer claims the right to operate a 1,000-student school under a disputed 1953 permit — without disclosing what kind of institution it would be or how students would get there.

I respectfully ask the Commission to require:

- Pedestrian safety infrastructure on school walking routes before any units are occupied
- Comprehensive traffic diversion modeling for all residential streets
- Full environmental analysis of the educational use before EIR certification
- A realistic construction mitigation plan with school-route protections
- Cumulative impact analysis including the Spirit Residential project at 70 North Knoll

The residents of Strawberry — and especially our children — deserve no less.

Respectfully,

Nicole Asonye
145 Chapel Drive
Strawberry, Mill Valley

From: [Nicki Asonye](#)
To: [PlanningCommission](#); [Michelle Levenson](#)
Subject: Re: Seminary at Strawberry — Request for Child Safety Protections (P1490)
Date: Thursday, February 26, 2026 9:54:51 AM

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February 26, 2026

Marin County Board of Supervisors
3501 Civic Center Drive, Suite 329
San Rafael, CA 94903

Re: Seminary at Strawberry — Request for Child Safety Protections (P1490)

Dear Supervisor Moulton-Peters,

I am writing as a Strawberry resident and parent of a student at Strawberry Point Elementary regarding the proposed Seminary at Strawberry development (P1490) at 201 Seminary Drive.

I support responsible housing development in Marin County, and I welcome the affordable housing and senior care components of this project. However, I am deeply concerned that the project as proposed does not adequately address pedestrian and child safety on the roads our children use every day to get to school.

The Strawberry road network north of the fire station has essentially no sidewalks. Reed Boulevard has a blind curve near Ricardo with no visibility protection. Ricardo Road is extremely steep with no pedestrian infrastructure. East Strawberry Drive has sections with no guardrails and steep drop-offs. These are the walking and biking routes for children attending Strawberry Point Elementary and Mill Valley Middle School.

I have a 3 year old and a 3 day old that will be playing in the neighborhood for years and need safe sidewalks.

The project's own EIR identifies three significant and unavoidable impacts, and the Seminary Neighborhood Association's independent peer review found deficiencies in traffic analysis, pedestrian safety assessment, and emergency response time calculations. The developer has also refused to identify what kind of 1,000-student school it intends to operate — making it impossible to assess the full traffic impact.

When this project reaches the Board of Supervisors for final approval, I urge you to condition any approval on meaningful pedestrian safety infrastructure being completed before occupancy, and to require full analysis of the educational use and cumulative impacts with the Spirit Residential project.

Thank you for your attention to this matter.

Sincerely,
Nicole Asonye
145 Chapel Drive
Strawberry, Mill Valley

From: [Allen Kleiman](#)
To: [PlanningCommission](#)
Cc: michaelgallagher.office@gmail.com
Subject: Significant Seminary Project Issues
Date: Thursday, February 26, 2026 9:59:55 AM

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To the Marin County Panning Commission

The county's own EIR identifies 13 significant environmental impacts. Three of those are classified as significant and unavoidable — meaning they cannot be reduced to acceptable levels no matter what mitigation measures are applied:

Cannot be mitigated

1. Vehicle Miles Traveled (traffic) — the project would generate traffic that exceeds county thresholds, and no feasible mitigation can bring it into compliance.
2. Greenhouse Gas Emissions — the project's carbon footprint exceeds established thresholds.
3. Construction Noise — construction would produce noise above acceptable levels for surrounding residents for the duration of the build, estimated at 4 to 10 years.

The remaining 10 significant impacts — covering areas like biological resources, hydrology, hazardous materials, and transportation — are flagged as reducible to less-than-significant levels, but only IF all proposed mitigation measures work as planned.

This “IF” is not acceptable for such significant problems!

These numerous and very significant impacts could lead the Seminary neighborhood and community down a never ending Rabbit Hole that would impact the wellbeing of our neighbors, children and Marin County in general.

The Seminary Area is one of the first visible entries to Marin County from San Francisco.

In addition to the above mentioned issues this project, as it is planned, would appear as a scar on the natural landscape, very visible from the highway, that is one of the main draws of people to Marin in the first place.

More work needs to be done to pare down this over ambitious plan to mitigate the many significant and important and unprecedented consequences it could have on our communities.

Thank you for your consideration.

Sincerely,
Allen Kleiman
149 Chapel Drive
Mill Valley