

EIR SCOPING COMMENTS FOR NORTH COAST  
LAND HOLDINGS COMMUNITY PLAN  
AMENDMENT/MASTER PLAN/DESIGN  
REVIEW/MASTER USE PERMIT/TENTATIVE  
MAP/TREE REMOVAL PERMIT ON THE FORMER  
GOLDEN GATE BAPTIST SEMINARY PROPERTY  
(P1490)



Seminary Neighborhood Association

Authored by: The Board of Directors

January 31, 2021

---

## Contents

INTRODUCTION .....	2
1. AESTHETICS .....	4
2. AGRICULTURAL AND FORESTRY RESOURCES .....	6
3. AIR QUALITY.....	7
4. BIOLOGICAL RESOURCES.....	9
5. CULTURAL RESOURCES .....	10
6. GEOLOGY AND SOILS .....	11
7. HAZARDS AND HAZARDOUS MATERIALS.....	13
8. HYDROLOGY AND WATER QUALITY.....	14
9. LAND USE AND PLANNING AND NOISE.....	17
10. POPULATION AND HOUSING.....	22
11. PUBLIC SERVICES .....	24
12. TRANSPORTATION/TRAFFIC.....	25
ADDENDUM – COMMUNITY ALTERNATIVE PROPOSAL .....	28

***“Such a beautiful tract of land should be a benefit to the entire community, not a problem child.”***

---

## INTRODUCTION

The Seminary Neighborhood Association (SNA) is a local neighborhood group that represents over 1000 residents who live next to or near the Seminary property. SNA has been involved in the various planning processes with this property for over 8 years, and is incredibly familiar with the conditions at the site and in the surrounding community. Accordingly, SNA is uniquely qualified to provide comments on the environmental review for this project.

The comments herein specifically respond to the Revised Notice of Preparation of EIR issued for this project on November 20, 2020. Furthermore, these comments primarily address the *scope* of the EIR. More detailed input regarding the impacts and merits of the project will be presented in future communications.

### Limitation on these comments

The centerpiece of the Seminary property is a significant academic campus. Despite the applicants stated intent to operate a very large college or university at the property, the current application provides not one scintilla of information about this significant use. Accordingly, with such a massive amount of information missing from the project description, the ability to meaningfully provide scoping comments is significantly hampered. The record should reflect this flaw in the process.

On September 21, 2020, the Strawberry Design Review Board unanimously rejected the NCLH proposal citing unanimously that “The proposed project is not stable, finite, accurate, nor sufficient as required to proceed, and the proposed project is lacking operational characteristics for the 1,000 person graduate institution, among other deficiencies.” However, at its meeting on November 10, 2020, the Marin County Board of Supervisors ruled that the EIR for the project could proceed, but that it must include and consider the impacts of the proposed academic institution. So far, such information has not been provided.

---

## Flaws in the initial project description

The project description outlined for the EIR contains misinformation. First, the developable portion of the site is only 101.1 acres, as 26 acres are underwater and have been formally disallowed for use in development calculations via a mapped easement. Second, significant portions of the property have already been developed (academic/administrative buildings, parking lots, student & faculty housing, playing field, etc). The area available for redevelopment needs to be reduced by the amount of area that has already been developed. Third, when considering existing development (buildings, housing units, parking areas and roadways), approximately 73% of the property is open space. The proposal reduces open space to approximately 50%. Due to hillside and dangerous soil conditions, the proposal will utilize well over 50% of the available space and a significant portion of the passive open space.

The following issues are submitted for EIR consideration.

---

## 1. AESTHETICS

Particular care will need to be given to aesthetic considerations because the Seminary property is a prominent piece of property widely visible from multiple public and private locations.

Obvious areas of analysis include:

2. The view corridor from highway 101 towards the property
3. The view corridor from Richardson's Bay to the property
4. The view corridor from the private development abutting the property

In addition to these major views, the project proposed to take areas specifically required to remain as open space in the Strawberry Community Plan and develop them. The reasons these areas were to be preserved was their aesthetic impact. The proposal would unwind this important visual and natural buffer, creating an uninterrupted line of visible development.

The December 12, 1982 *Visual Analysis of the GGBTS Master Plan* by John Roberto and Associates contains a thorough review of the as is site and should be reviewed as a starting point.

The area known as Chapel Hill is proposed to undergo a significant change that compromises the serenity, views and mobility of the existing, adjacent private land owners. Similarly, the open space known as Shuck Knoll is proposed for development with visual impacts to existing residences that need to be studied, defined, and mitigated. Seminary Point and Seminary Knoll are visually prominent ridge lines as defined by Title 22 Development Code standards., and must be analyzed as such.

Investigate and mitigate the visual impacts of the proposed development to all existing residences. The development proposed opposite the homes at the "top" of Chapel Dr deserves special attention.

---

Further, the architectural design is strikingly different from and incompatible with that existing on the site.

The Strawberry Community Plan singles out the location identified for a chapel, the open space band between Chapel Dr and Seminary Dr and the “point” (current location of GGBTS dormitories) as being of regional significance. The impact of the proposal on all of these locations should be carefully examined.

The proposed CCRC requires 332,500sf. This is an enormous structure for Strawberry and out of scale with anything in the seminary neighborhood. Its mass and scale require careful study.

In its entirety, the site is large, varied and sloped, making it hard to visualize. A large-scale 3D model must be created to allow all stakeholders (particularly those not trained in the reading of design documents) to understand how the proposal and each of the alternatives will appear from every vantage point - such as views from Hwy 101 and from the Bay, lantern effect at night time. The Forested Knoll is a prominent regional view and must not be destroyed.

---

## 2. AGRICULTURAL AND FORESTRY RESOURCES

An arborist and biologist must be hired to examine all vegetation and habitats on the site and determine species that must be preserved and how to mitigate significant tree and habitat impacts.

The Monterey Pines are reaching the end of their natural life. The site needs a comprehensive revegetation plan. This plan should include a detailed description of how vegetation will transition from as-is, to as proposed, and how biological resources will be impacted by revegetation. For example, does NCLH intend to denude the site with the wholesale removal of the Monterey Pines or will this be done in carefully orchestrated phases? Over the years, a meaningful maintenance program for the existing trees has been nonexistent, resulting in problems. Consider a bond or other enforceable instrument to ensure that any re-forestation plan is enforceable in the future.

---

### 3. AIR QUALITY

Project implementation will result in extensive construction-related traffic and resulting air quality impacts.

- How many car and truck trips/day will be required over what period of time?
- What steps will be taken to ensure that debris doesn't leave trucks and land in the streets and neighborhoods?
- How much particulate matter will be entailed by all of this traffic? How many cases of asthma and other respiratory illnesses will result? How will this airborne matter interact with the region's already numerous spare the air days?
- How much greenhouse gases will be expanded by construction-related traffic?

The project will result in a significant increase in vehicular traffic (both people commuting to the campus and residents going about their daily lives). Given Strawberry's roadway system, all of this traffic will funnel through a small number of intersections. Please study the traffic increases at all intersections and:

- Calculate how much additional greenhouse gases will be emitted by vehicles for the overall project and for waiting to transit these intersections.
- Calculate how many additional cases of asthma and other respiratory illnesses will result from the exhaust of vehicles waiting to transit these intersections.
- All of this traffic will result in increased airborne dust. How will all of this entailed particulate matter interact with the region's already numerous spare the air days?
- How will dust and noise monitoring be performed and reported to the neighbors during construction?
- Who will enforce the construction mitigation measures?

The project is not contemplating onsite housing for the people who work or study at the CCRC, fitness center, childcare center or college. How much greenhouse gas will be emitted by people driving from their place of residence to the Seminary site?

---

- How will the new building construction achieve energy efficiency goals? What can be done to offset greenhouse gas emissions resulting from the operation and maintenance of the existing building and infrastructure?

---

## 4. BIOLOGICAL RESOURCES

A licensed Biologist should be hired to determine the negative impacts that this development will have on wildlife, flora, and fauna. Also, consultations should be made with such groups as the Richardson Bay Audubon, Audubon Canyon Ranch, the Marin Conservation League, the California Conservation Corps, and other related environmental groups. Due to the age of any previous development on this site, there is missing data in County records on many issues, such as wetland and stream mapping, and other data layers critical for analysis.

The site is home to a Great Blue Heronry, Peregrine Falcons, Egrets, and a number of species of Eagles, including Bald Eagles that recently returned to Southern Marin for the first time in decades. Bald Eagles have regularly been observed in all parts of the property including Chapel Hill, Forested Knoll, and Shuck Knoll. An abundance of deer and coyotes also occupy the site. The impact of the proposed development on these and other wildlife should be closely studied.

The abundant wildlife on the site is largely cut off from nearby habitat by highway 101, Tiburon Blvd, etc. Because of this, existing wildlife corridors should be identified and protected. During the wet season, a vernal pool has been observed around an outcropping in the Shuck Knoll area where development is proposed, and the sensitive species in this area need to be investigated, documented, and protected.

Investigation of impact on wetlands, and the identification of blue line streams<sup>1</sup> must be investigated. For example, salt marsh harvest mice may inhabit the wetlands adjacent to the Seminary property, sensitive bird, fish, and other species inhabit the wetland and surrounding Bay environment and may be impacted by runoff from construction and/or improvements associated with the project such as storm drainage, water, and sewer systems that may require repair/upsizing adjacent to the site.

---

<sup>1</sup> Blue-line stream” means that a stream appears as a broken or solid blue line (or a purple line) on a USGS topographic map. Streams do not have to be “blue-line” to be considered waters of the State.

---

## 5. CULTURAL RESOURCES

Cultural resources on the site need to be investigated by qualified specialists. How was the site used by Native Americans and what cultural resources remain? Additionally, the Theological Seminary has a rich history in Strawberry. Its cultural history should be studied and certain aspects of building and/or the site preserved as cultural resources for future generations.

---

## 6. GEOLOGY AND SOILS

A licensed geotechnical engineering firm must be hired to investigate the stability of the area under development. It is known, for instance, that soils on the hillsides are not stable and development would probably cause unexpected movements damaging nearby properties.

GIS data indicates the property is “mostly landslides,” has issues with liquefaction, and areas of mapped debris flow. The 1982 Master Plan for the site required landslide repairs at the property. There is no information as to whether this actually occurred.

Previous reports for the property indicate that several seeps exist on the site and the ground water is close to the surface of the land in several locations.

The following published literature and other available information must be considered.

- Davenport, C. W., 1984, An Analysis of Slope Failures in Eastern Marin County, California, Resulting From the January 3 & 4, 1982 Storm, California Department of Conservations, Division of Mines and Geology DMG Open-File Report 84-22.
- Donald Herzog & Associates, August 10, 1982, Preliminary Report: Anticipated Remedial Measures, Golden Gate Seminary, Seminary Point, California, Job Number 944.1.
- Donald Herzog & Associates, May 19, 1989, Report: Geotechnical Investigation, Site Development and Public Improvements, Seminary Ridge Development, Marin County, California, Project Number 944-1-3-1.
- Herzog Geotechnical Consulting Engineers, March 21, 2011, Report on potential for landslides in the Seminary property hillsides, File Report 1833-03-11.
- Huntington Engineering & Environmental, Inc., November 4, 1944, Report, Geotechnical Investigation, Lot 25 Seminary Ridge Subdivision, Marin County, California, Project Number 6768.01-0-1.
- Rice, S.J., Smith, T.C., and Strand, R.G., 1976 Geology for Planning: Central and Southeastern Marin County, California, California Division of Mines and Geology, OFR 76-2.

- 
- All other California Department of Conservation reports on the general area.

---

## 7. HAZARDS AND HAZARDOUS MATERIALS

Phase I and Phase II environmental site assessments are needed. It is expected that lead paint has contaminated the soils around the existing structures and needs to be remediated prior to demolition and new construction. It is requested that the site be investigated for asbestos that may be present in import soils in the road base, as a component of the asphalt paving, and as building materials. Appropriate investigation, planning, and precautions are needed to properly demolish the existing buildings/materials. Additionally, significant debris, drums, and oil containers have been observed over the years at the maintenance shed area, and it appears debris has been spread adjacent to the existing dirt road from the maintenance shed area to Shuck Knoll.

A previous Phase I for the property found that there is a hydraulic lift and empty underground fuel tank in the maintenance building but of which must be removed. No record of permits for these facilities is provided. The removal plan must be analyzed.

The property is located in the “very high” fire risk zone. A detailed mitigation and evacuation plan for a wildfire scenario must be analyzed. Strawberry is already built out per the master plan, this development will add to the already dangerous vehicular evacuation choke points.

---

## 8. HYDROLOGY AND WATER QUALITY

This section addresses storm drainage, sanitary sewer, and potable water.

### **Storm Drainage:**

The existing site is centrally located on the Strawberry Peninsula, and the site was constructed before most of the adjacent residential housing. Therefore, there are a significant number of “private” drainage features and assets associated with the site that convey drainage from the site to the adjacent San Francisco Bay. It is presumed these facilities are owned and maintained by NCLH. However, NCLH disputes this. The ownership and responsibility of these drainage facilities need to be determined and identified. Many of these drainage facilities cross private and public property. Nearly all the drainage facilities are well beyond their useful life and are in a state of complete disrepair. The County has indicated they have no responsibility for these drainage features. These features must be studied and repaired as part of the development project, and the scope of the repairs needs to be defined as it is critical to the environmental review process as it includes disturbance in wetland and sensitive habitats.

The development will increase the impervious area and runoff from the site considerably, overwhelming existing drainage facilities. A drainage study is requested consisting of: a hydrology study of the site and adjacent areas that contribute to the overall drainage system, a condition assessment of existing drainage facilities from the site to their point of discharge, hydraulics study of the capacity of the existing drainage facilities, and consideration and mitigation of sea level rise.

It is anticipated that upsizing and repair of these existing facilities are required, including construction within the tidal marsh area and within very sensitive habitats that may contain endangered species. A few areas of note include:

- The existing drainage swale and corroded corrugated metal culvert conveying runoff from Shuck Knoll, through Strawberry Shores Apartments property, and discharging to the wetland approximately 175 feet south of the intersection of Ricardo Rd and Seminary Drive intersection.

- 
- Water drains through the site, across the playing fields, and floods the Strawberry Cove condominium complex.
  - Multiple swales and culverts conveying and discharging runoff to the wetland adjacent to the Seminary Playing Field.
  - Multiple additional culverts along Seminary Drive.
  - The remaining drainage system at the perimeter of the site.

Additionally, the increased runoff from proposed development on Shuck Knoll is expected to increase the risk of flooding of downstream properties that are currently located in the flood plain. The impacts of this additional runoff coincident with sea level rise and possible mitigation measures are requested to be studied/considered. A new stormwater pump station at Ricardo Rd and Seminary Drive is requested to be studied as a potential solution to mitigate flood risk and sea level rise impacts, especially to address stormwater runoff at high tide, and potentially to mitigate roadway flooding during storms and sea level rise.

The sewage pump station behind the 7-Eleven would seem to be vulnerable to sea level rise. With the proposed increase in development, the viability of this infrastructure should be studied and mitigated. - What is the impact of the expected 3-foot sea level rise on Seminary Drive as it is the primary entrance to the property?

Finally, portions of Seminary Drive and the Redwood Frontage Road (including the Seminary on and off ramps on both sides of the freeway) are within the flood zone and are known to regularly flood upon high tide. These tidal flooding impacts need to be studied and mitigated to avoid impacts to traffic during the flooding events and allow continual use of the roadways in the face of climate change and sea level rise. Mitigation measures requested to be studied include a pump station at Ricardo Rd and Seminary Drive, a sea wall along Seminary Drive and other strategies.

These complex issues need to be studied in detail by experts including specialists in hydrology, wetlands.

---

### **Sanitary Sewer:**

New sanitary sewer service connections onsite are expected to support the proposed large increase of development. Additionally the volume and diurnal flow patterns are expected to change since many of the site uses are proposed to change (e.g. different academic use and operational characteristics, CCRC, gym, etc.). These changes are anticipated to change the volume, quality/type, and flow patterns to the public sanitary sewer system. Given these substantial changes, it is requested that a qualified licensed civil engineer be hired to study these changes and work with the local sanitary sewer service provider to determine the impact on the related public sanitary sewer collection system, pump stations, odor control, treatment, and treated water discharge to the San Francisco Bay.

It is anticipated that significant upgrades to the local sanitary sewer system (e.g. upsizing collection pipes, upsizing pumps, upsizing treatment, etc.) may be required. Many of these facilities are located in close proximity and impact wetland habitats. The required upgrades need to be studied, defined, and mitigated through a formal study that is completed in collaboration with the local sanitary sewer agency. These studies typically require significant effort and time.

### **Potable Water:**

New potable water demand is expected to support the proposed large increase of development. Additionally the demand patterns are expected to change since many of the site uses are proposed to change (e.g. different academic use and operational characteristics, CCRC, gym, etc.). These changes need to be studied by a qualified licensed Civil Engineer in collaboration with Marin Municipal Water District to determine if upsizing treatment, storage (tanks), and conveyance (pipelines) systems are required.

---

## 9. LAND USE AND PLANNING AND NOISE

### **The Project irreparably conflicts with the Strawberry Community Plan**

The Strawberry Community Plan (SCP) is the specific, controlling document for the project site, and the SCP has always contemplated that the site be used only as a Seminary, with associated student and faculty housing. (See numerous discussions in 1974 SCP regarding Seminary at pages 32, 47, and 58, for example.) While the SCP was amended in 1982 to permit a finite amount of market-rate housing in a very specific area, this amendment did not change the fact that only a seminary and its associated student and faculty housing would remain on the areas of the property not being sold off for housing. More importantly, this amendment contained some very clear language about the capacity for the site when it stated that the additional development approved via the amendment, “was determined to be the maximum desirable based on the projected traffic and the context of the property within the community.”

A series of self-serving SCP edits are proposed to delete the requirement that the housing on site be for students and faculty only, and to totally change the for-sale requirement of the market-rate homes to now allow 100% rental. These major SCP components now sought to be stricken were the result of years of negotiations and hard work by the Strawberry Community, and should not be permitted to occur in such a haphazard and singularly focused manner.

As important as the deletions, however, is what isn't proposed to be changed in the SCP. The remainder of the document, including the amendment regarding the Seminary site, is untouched, thereby resulting in a wholly inconsistent document. For example, the following SCP language would remain, which is not only inconsistent, but also shows why the project cannot be approved:

“Of particular concern was the increasing number of attached multiple residential developments and the increasing impacts of traffic generated by these new developments.”

---

“If new development is to occur, it can strengthen this character by providing the traditional setting of detached single family units within any new development proposed for the area.”

The SCP should be respected, and a comprehensive community-driven update process undertaken before consideration of a nonconforming project. The entire context of the SCP should be respected, and only uses that take into account the current traffic situation and residential nature of the surrounding community should be considered.

### **The Project requires a CUP for the School**

The 1953 Use Permit allowing a self-contained seminary to operate at the property was superseded by the approval of a 1984 Master Plan for the site. When the Master Plan expired, so did the right to operate an educational use. Accordingly, in order for the current application to be complete, it must also include a request for a Use Permit for a school, and clearly describe the operational characteristics of said school such that there can be meaningful environmental review, as well as an informed consideration of the required CUP findings.

The 1953 CUP for the Property was for one use, and one use only:

“...to permit the construction of a Theological Seminary and dormitories and other buildings incidental to such use...”

The record for the 1953 CUP indicates that two factors were central reasons a seminary was ever even considered as acceptable at this site:

1. That 100% of the students would be housed on the property, and
2. That the college was post-graduate, thereby making it an asset to the area.

A school without the characteristics cited above would in no way meet these criteria. A school that does not house its students on site generates significantly more vehicle

---

trips, noise, and other impacts, at a level far greater than the self-contained post-graduate institution contemplated in 1953. On top of this, the applicant also requests 100s of new rental housing units based on the theory that the student and faculty housing units are somehow equivalent to much larger homes that will be inhabited by people that primarily work off-site. This apples to oranges comparison is not supported by logic or the law, and flies in the face of the original concepts underlying the CUP approval.

Please refer to the January 25, 2021, letter from Riley Hurd setting forth the need for a new CUP for the school use. This letter was submitted, in part, as a response to the NOP for the EIR.

- **Details of the proposed college need to be defined**

- Number of students
- Number of faculty
- Number of staff
- Number of visitors each day
- Amount of onsite housing dedicated to students, faculty and staff
  - Plan for ensuring that onsite dedicated housing remains dedicated to that use over time
- How many students, faculty and staff will have to commute each day
- Hours of operation
- What will the academic nature of the college be?
- For how many months or years will students attend the college?
- Will students at the college interact with students or faculty at other academic institutions in the Bay Area? With the tech industry or other businesses? If so, how and where?
- Activities provided outside of class (social events, sporting events, conferences, etc.)
- Lighting plans
- How much noise will be generated
- and so on.

As the college is studied, care must be used before using standard “book rates”

---

that estimate the impacts (e.g., traffic) for colleges since the proposed college isn't very "standard" (e.g., no student housing, extensive connections to other regional academic institutions and businesses, many special events, etc).

- Similar questions arise from the CCRC, fitness center and art museum
  - Number of visitors
  - Number of staff
  - Amount of onsite housing dedicated to staff
    - Plan for ensuring that onsite dedicated housing remains dedicated to that use over time
  - Hours of operation
  - Special events
  - Lighting plans
  - How much noise will be generated
  - and so on.
- How will the playing field be used?
  - Field/park hours of operation, noise, traffic, and light impact.
- The EIR should study how durable any plan approved by the County will be over time and identify measures that can be taken to ensure durability. For example, most of the homeowners (at least those who purchased in the last 60 years), did so with the expectation that the future of the seminary was settled. It was well defined in a Community Plan, Master Plan and Conditional Use Permit. Over the last decade we've learned that none of these documents provide any assurance of what the future will bring. How do we know that open space will stay open? That schools won't continue to expand? That limitations on use of the fitness center won't be removed?
- In its April 10, 2017 letter to NCLH, Marin Code Enforcement made these findings and conclusions:

---

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

CONCLUSIONS: If it is your intention to pursue legalizing the unauthorized activities, please revise your current planning applications to include these uses for consideration. *Please note that baseline determinations for environmental review do not include the effects of unauthorized uses on a property.*”

We draw your attention to the final sentence of the County’s conclusion.

Note that the current onsite tenant, Olivet University, which is a private Christian institution of biblical higher education, broadly complies with the now expired<sup>2</sup> 1953 conditional use permit.

---

<sup>2</sup> See Riley F. Hurd letter of January 25, 2021.

---

## 10. POPULATION AND HOUSING

Currently, the NCLH site includes 211 student and faculty living units. The proposal includes 488 living units. The attached breakdown shows the type of housing units for each.

Unit Size	Existing	Proposed
Four Bedrooms	2	8
Three Bedrooms	19	197
Two Bedrooms	54	109
One Bedroom	54	24
Studios	82	0
Sub-Totals	211	338
CCRC	0	150
Totals	211	488

The NCLH proposal specifies 50 affordable units and then goes on to claim a density bonus of 96 units. However, as noted above, they will destroy anywhere from 112 (82 studios plus 30 one bedroom units) to 211 restricted (for the use of seminary students and faculty) units. NCLH proposes to destroy more affordable housing units than they propose to create. Therefore, they are not entitled to any density bonus. Their entitlement is limited to the maximum allowable units of 242 (general area zoning) or 210 (Strawberry Community Plan)<sup>3</sup>.

Recently the State and County have embraced accessory dwelling units. How will ADU's fit into the NCLH proposal? If allowed, then the impacts (traffic, open space, greenhouse gases, noise, light pollution, etc.) should all be studied. ADU's may also be built by other Strawberry homeowners. The impact of the overall increase in density of Strawberry associated with ADU's should also be considered as part of this EIR.

---

<sup>3</sup> This assumes 100 buildable acres. However as noted above, developable acreage needs to be carefully calculated based on total acreage less underwater acreage, already developed acreage (e.g., academic campus and student and faculty housing, parking lots, roads) and land undevelopable because of slope, springs, etc.

---

NCLH plans for 100% of the built housing to be rental. We think it's worth studying how the difference in ownership patterns (rental vs ownership) effects community life (volunteerism, voting, etc).

---

## 11. PUBLIC SERVICES

The population on the NCLH site will explode with the addition of more than 2,000 additional residents, all of whom will need public services. Many of these services are funded by parcel taxes. Currently, NCLH only pays taxes on 9 parcels and their plan contemplates no additional parcels. If each residential unit were its own parcel, NCLH would pay approximately an additional \$1 million per year in parcel tax. As proposed by NCLH, this shortfall in revenue will fall onto the shoulders of other parcel owners. This inequity needs to be carefully studied.

Furthermore, the impact of this development on the availability of adequate water pressure (1,000 GPM vs. 500 GPM) must be assured. And any delay in the response time of the Southern Marin Fire Protection District Fire Station #9 (Reed Blvd) must be measured in light of the added development and any costs thereof, assuring that there will be no delays from current.

The waste water infrastructure (sewer pipes, pump stations, treatment plants, etc.) should all be studied for adequacy and resilience in the face of sea level rise. Mitigation plans for all identified impacts should be surfaced. Please see the section titled "HYDROLOGY AND WATER QUALITY" for an expanded description of the aquatic impacts of this project on public services.

---

## 12. TRANSPORTATION/TRAFFIC

The proposed development will increase street traffic substantially. An increase in daily traffic by a factor of at least 4 (which the proposed development can result in) will cause significant safety concerns. It is considered mandatory that a professional traffic engineering group be hired to closely examine the impacts of the added development to the area.

- Safety concerns

- Essentially, the Strawberry area has two lane roadways with very busy bike lanes and limited walkways and walkway crossings. Also, current street parking along with the pedestrian and bike traffic make vehicle passage often dangerous.

- Portions of East Strawberry Drive are particularly dangerous with 10 feet height difference between lanes with no guardrails.

- Speeding is especially hazardous on the lower (i.e., water side) of the divided section of East Strawberry Drive. The older houses were built in the late 1940s and early 1950s when East Strawberry ended near 313 East Strawberry Drive. Driveways and garages for these older houses were designed to be approached from the north. Turning into these driveways and garages approaching from the south requires much lower speeds, complete stops, and sharper turns. Backing out of these home's driveways is already scary with the current levels of traffic levels. Residents checking their roadside mailboxes and even the mailman are also at risk from fast traffic on this street. The situation will become even less safe with the increased traffic that comes from the proposed development.

- Strawberry Point School, and to a lesser extent the Strawberry Recreation Center and playing fields and the blind downhill corner approaching from the south, provide natural and necessary traffic hazards. There are crosswalks and flashing signs but observance requires attentive drivers. These hazards should not be exacerbated by the addition of substantial traffic on East Strawberry Drive.

- Increased traffic enforcement, radar signs, speed bumps, etc have all been requested for East Strawberry in the past, but no action has been taken.

- Turning lane from Seminary Drive onto Gilbert (the primary point of access to the Seminary property) is blind to opposing traffic.

---

-Within the property being studied, it is understood that the roadways do not meet County standards of width nor of the degree of steepness allowable. This must be identified in the study.

- Roadway capability – Seminary Drive/Strawberry Drive & Intersections

-There are two main entrances/exits from the Strawberry area – Frontage Road at Hwy 101 (incl both Northbound and Southbound traffic) and at Tiburon Boulevard.

-The service at these intersections is classified as marginal at best today. A 4-fold increase of daily traffic due to the proposed development plan is an intolerable situation.

-The intersections at Ricardo and Seminary Drive pose potentially dangerous safety concerns as does the intersection of Belvedere and E. Strawberry where higher speed traffic turns off Tiburon Blvd into potentially oncoming traffic from Belvedere.

-Reed Blvd poses potentially dangerous safety concerns with increased traffic due to steepness and limited roadway.

-Furthermore, the present entrance and exits off Seminary Drive to the property in question will create a congestion nightmare with the increase being proposed. There is parking on both sides of the roadway and, as previously mentioned, there is considerable bike traffic daily so as to interfere with the driving lanes.

-NCLH proposes to close Chapel Dr. to through traffic. This change enjoys no support from the residents of Chapel Dr. The implications on traffic circulation need careful study.

-The locations of all driveways require careful analysis. Driveways should connect to roadways in the interior of the campus and not the periphery (e.g., Chapel Dr.).

- McDonald's drive-through traffic consistently spills out onto the Redwood Frontage Road during peak commute time, snarling traffic. Please factor this into the traffic studies.

- The location of the two 7-Eleven driveways is highly dysfunctional and interrupts the safe and efficient flow of traffic. This should be studied and mitigated.

---

Traffic calming on Seminary Drive and other neighborhood streets should be studied and implemented as a mitigation measure. For example, the nearby sports car vendors' customers often test drive their cars at high speeds along Seminary Drive creating a life safety hazard that will be magnified with additional vehicle and pedestrian traffic from the proposed project.

The community prides itself on walking and biking when possible. School-age children are encouraged to walk to school (especially to our local elementary school). How will the increase in traffic associated with the proposed development impact these values? Especially given the lack of sidewalks and bike lanes in Strawberry? Also Seminary Drive has recently become very popular with cyclists, including tourists on rental bicycles from San Francisco. The impacts of the proposed development on all of these uses need to be studied and mitigated.

We believe an independent study on safety and mobility for Strawberry should be conducted as part of this EIR.

Furthermore, this is hardly an ideal location in regards to Vehicle Miles Traveled. Where will all of these new residents work? Where will the CCRC and students and faculty live? The proposal sets up a perfect storm of peak cross-commutes by failing to provide on-site housing and by overbuilding the market-rate units in an area not near any meaningful employment centers.

---

## ADDENDUM – COMMUNITY ALTERNATIVE PROPOSAL

The Strawberry Community Plan is the controlling document for Strawberry and the seminary site. It can't be amended without demonstrating overriding community benefit. Since the NCLH plan provides no such benefit, we suggest that the EIR study an alternative plan that requires no amendment to the SCP (i.e., a plan that completely conforms to the SCP):

A theological graduate school with 211 units for students and faculty housing.<sup>4</sup> Historically, the traffic for such a development has been measured at approximately 1,600 trips per day and has not caused any significant safety problems. Site density is 18.5%.

OR

210 housing units (RMP 2.1) – primarily single family units. With this type of plan, daily trips are estimated at 2,000. Density is estimated at 30%.

Both of these alternatives would preserve passive open space and ridgelines. Neither provides for a CCRC, business offices, a fitness center nor for a childcare facility.

In addition to studying the above alternative, we request that other *variations* on the NCLH proposal be examined. In particular:

- Examine a variation where 100% of the students and faculty are provided with onsite housing.
- During 2019/2020 NCLH repeatedly expressed their intention to build something akin to The Rockefeller Foundation Bellagio Center in Italy. NCLH should be taken at their word and something on the scale of the Bellagio Center be studied as a variation for the proposed college.

---

<sup>4</sup> Some people may scoff at the possibility of the site ever becoming a seminary again after the Golden Gate Baptist sold to NCLH. However the campus is currently occupied by Olivet theological seminary, and they have made plain their desire to stay there as long as possible.