

3.17 Wildfire

This section evaluates potential wildfire-related impacts associated with the implementation of the proposed Larkspur Ferry Service Expansion and Parking Project (Project) and the Build Alternatives. It describes existing wildfire hazard conditions within the proposed Project area and surrounding vicinity, identifies applicable goals and policies, and analyzes potential environmental effects. Where appropriate, measures to avoid or minimize adverse impacts are also identified.

Based on the review of the California Fire Hazard Severity Zone (CAL FIRE 2025), the proposed Project is not in a state responsibility area and is not within a very high severity fire zone.

3.17.1 Existing Conditions

3.17.1.1 Regulatory Setting

Federal

Federal Wildland Fire Management Policy

Federal wildfire management is guided by interagency standards and policies that direct fire prevention, preparedness, suppression, and ecosystem management activities for agencies such as the Bureau of Land Management, U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, and Bureau of Indian Affairs. These policies emphasize protection of firefighters and public safety as the highest priority, use of science-based decision-making, coordination among agencies, and integration of wildfire management with land and resource planning. This also recognizes wildfire as a natural ecological process while establishing guidelines for risk management, interagency cooperation, and protection of public health, infrastructure, and natural resources.

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 establishes federal requirements for hazard mitigation planning as a condition for receiving Federal Emergency Management Agency (FEMA) mitigation funding. The act requires local jurisdictions to prepare and maintain a Local Hazard Mitigation Plan that is reviewed by the State and approved by FEMA, with updates required at least every 5 years. These plans must include an assessment of local hazards, risks, and vulnerabilities, along with strategies to reduce potential impacts from natural hazards such as earthquakes, flooding, and wildfires.

State

California Department of Forestry and Fire Protection Strategic Fire Plan 2024

The 2024 California Department of Forestry and Fire Protection (CAL FIRE) Strategic Plan (CAL FIRE 2024) establishes CAL FIRE's direction for improving wildfire prevention, response, and natural resources management across California. It emphasizes strengthening emergency response capabilities, reducing wildfire risk through mitigation and forest management, and building resilient communities through partnerships and public engagement. The plan also focuses on enhancing workforce development, modernizing infrastructure and technology, and promoting safety, equity, and collaboration to better protect lives, property and natural resources. Many of the goals and objectives from the 2019 strategic plan remain relevant. Goals and objectives consist of the following:

- Goal 1: Improve our core capability.
- Goal 2: Enhance internal operations.
- Goal 3: Ensure health and safety.
- Goal 4: Build an engaged, motivated, innovative workforce.

California Public Resources Code Sections 4201–4204

Fire Hazard Severity Zone mapping was developed in response to significant and destructive wildfires, which highlighted the need to identify high risk areas and implement measures to reduce wildfire hazards. State legislation requires the mapping of these zones under California Public Resources Code Sections 4201 through 4204, which apply to all lands designated as State Responsibility Areas (SRAs).

Senate Bill 1241

Senate Bill (SB) 1241 requires that Fire Hazard Severity Zone maps prepared by CAL FIRE be incorporated into local general plans. These maps establish the basis for policies to address wildfire prevention and protection in areas designated as High or Very High Fire Hazard Severity Zones. In addition, SB 1241 requires that updates to the Safety Element in the *City of Larkspur 2040 General Plan* (City of Larkspur 2024) be reviewed by CAL FIRE before adoption to ensure adopted policies adequately address wildfire risks and protection measures (Senate Bill SB 1241, 2012).

California Fire Code (California Code of Regulations Title 24, Part 9)

The California Fire Code, adopted as part of California Code of Regulations (CCR) Title 24, incorporates the International Fire Code with state specific amendments and establishes minimum fire safety standards applicable statewide. The code is updated and published every 3 years by the California Building Standards commission and local jurisdictions, including the City of Larkspur. More stringent requirements may be adopted based on local conditions.

The California Fire Code regulates fire safety requirements for new and existing buildings, facilities, and operations, including provisions for emergency planning, fire protection systems, hazardous materials, fire flow, and hydrant placement. Typical requirements address features, such as automatic sprinkler systems, fire-resistant construction materials, and vegetation defensible space, around structures in wildfire-prone areas.

Local

2023 Marin County Unit Strategic Fire Plan & Community Wildfire Protection Plan

The Marin County Unit Strategic Fire Plan & Community Wildfire Protection Plan (CWPP) was adopted by the Marin County Fire Department in May 2023. The CWPP is a coordinated, regularly updated plan that integrates wildfire prevention, preparedness, and response strategies across the county. It focuses on reducing risks to life, property, and natural resources through measures such as defensible space compliance, vegetation management, fuel reduction, improved access, and public education. The plan also emphasizes coordination with partner agencies and enforcement of wildfire-related codes to strengthen community resilience and guide targeted investments in wildfire reduction (Marin County FD 2023).

Marin Operational Area Emergency Operations Plan

The *Marin Operational Area Emergency Operations Plan*, adopted in October 2014, outlines response procedures and large-scale disasters affecting Marin County. The Marine Operational Area (OA), which includes the City of Larkspur, facilitates coordination with other governmental agencies as needed. The Emergency Operations Plan (EOP) does not address routine, day-to-day emergencies or established emergency response procedures. It serves as a planning reference, and the three main goals are to provide effective life safety measures and reduce property loss and damage, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost recovery efforts (Marin County Sheriff's OES 2014).

Marin Wildfire Prevention Authority

The Marin Wildfire Prevention Authority (MWPA) establishes countywide goals and objectives to reduce wildfire risk and improve community resilience. Key program areas include vegetation management to reduce fuel loads, enhancement of wildfire detection and evacuation systems, grant programs to support defensible space and home hardening, public outreach and education, and coordination with partner agencies. These efforts are intended to reduce wildfire hazards, improve emergency preparedness, and limit potential impacts to life and property.

City of Larkspur 2040 General Plan

The *City of Larkspur 2040 General Plan* was adopted in September 2024 (City of Larkspur 2024) and contains goals and includes goals and policies relevant to wildfire under the following elements:

Community Health and Safety Element

Goal SAF-1: Ensure community fully informed about natural hazards and methods to avoid or mitigate the effects of these hazards.

Action Program SAF-1.1.b: Conduct public outreach to inform residents about the actions they need to take in the case of wildfire, flood, or other emergency. Make hazard maps available. Prepare updates regularly and make available public maps depicting evacuation routes and areas prone to environmental hazards.

Action Program SAF-1.1.c: Continue to support the Marin County Wildfire Prevention Agency in coordinating and leading the County efforts to reduce the risk from wildfire and provide regulations and recommendations on efforts to reduce that risk.

Action Program SAF-1.1.e: Continue to coordinate with local and regional Marin fire agencies to publicize wildfire awareness and prevention strategies with applicable wildfire awareness programs.

Action Program SAF-1.1.f: Continue to coordinate with the Central Marin Fire Department, the MWPA, and state, federal, and regional Marin fire agencies to develop and implement emergency services training protocols and to practice disaster preparedness drills.

Action Program SAF-1.1.k : Continue to implement the resale inspection permit program that provides disclosure of hazard risk information to prospective buyers before the sale of property. The program should include detailed hazard information, such as high and very high hazard wildfire severity zones, flood zones, and tsunami and future sea-level rise inundation areas.

Policy SAF-2.2: Prepare and maintain a comprehensive multi-modal evacuation plan.

Action Program SAF-2.2.d: Identify and improve deficient access and evacuation routes. Implement findings of the Marin Wildfire Protection Authority Evacuation Ingress-Egress Risk Assessment. Use the visual risk assessment and risk factors to identify and prioritize existing deficient access and evacuation routes. Improve evacuation routes based on the prioritization ranking and in areas identified as having deficient evacuation routes affected by new development, but also in consideration of improvements required for a transportation network which is resilient to flooding and inundation from sea-level rise (City of Larkspur 2024).

Policy SAF-2.7: Implement the Marin County Multi-Jurisdiction Hazard Mitigation Plan and Larkspur Annex (MJHMP) and updates to that plan when the updates are adopted (City of Larkspur 2024).

Action Program SAF-2.7.b: Work with the County and other jurisdictions covered by the MJHMP to complete current evacuation plans being prepared by the MWPA and to ensure all State requirements for Safety Elements included in Assembly Bill 747 (2019) are met, including identifying evacuation routes and their capacity, safety, and viability under a range of emergency scenario

Goal SAF-6: Ensure protection of residents and property from fire hazards.

Goal SAF-7: Reduce hazard from wildfire.

Policy SAF-7.1: Continue to require that new and existing development in the most current CAL FIRE Fire and Resource Assessment Program Very High Fire Hazard Severity Zone Maps and adjacent High Fire Hazard areas meet all current building, property maintenance, and fuel reduction requirements for these zones. New development, including remodeling and additions, within the Very High Fire Hazard Severity Zone will be required to meet or exceed standards in title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (SRA Fire Safe Regulations) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations) and Fire Safe Regulation, Home Hardening, PRC 4290 (City of Larkspur 2024).

Action Program SAF-7.1.a: Amend the Larkspur Municipal Code Section 14.10.010 that defines the City's Very High Fire Hazard Severity Zone to include the area north of E. Sir Frances Drake Boulevard from the east end of Larkspur Landing Circle to the Larkspur city limits and from Drakes Way east to the Larkspur city limits. Amend the code section to be consistent with the City's map of the Very High Fire Hazard Severity Zone.

Action Program SAF-7.1.b: Continue to monitor properties designated Fire Hazard Severity Zones on Figure 7-10. As these maps are updated By CAL FIRE, the City will monitor properties within the most current Very High Fire Hazard Severity Zone maps, as presented on the CAL FIRE FRAP website, which can be accessed at: <https://osfm.fire.ca.gov/fire-hazard-severity-zones-maps-2022/>.

Action Program SAF-7.1.d: The City will require that new development, including remodeling and additions, within the Very High Fire Hazard Severity Zone will be required to meet or exceed standards in title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (SRA Fire Safe Regulations) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations) and Fire Safe Regulation, Home Hardening, PRC 4290. The City will require fire-safe design for future development proposals.

Action Program SAF-7.1.e: Continue to monitor properties in Very High Fire Hazard Zones and require abatement of flammable vegetation and fire hazards, as determined by the Fire Chief.

Action Program SAF-7.1.f: Continue to work with Marin Municipal Water District to meet its goal to expand its water supply to meet a 4-year demand and to provide and maintain water supply systems and the long-term integrity of the systems to supply for fire suppression for all structural and wildfire fire suppression, which should include the maintenance and replacement of fire hydrants within the City of Larkspur. Require proof of adequate water supply for suppression of wildfires and structural fires for all conditional project approvals.

Action Program SAF-7.1.g: The City will locate new essential critical and public facilities, including healthcare facilities, emergency shelters, fire stations, emergency command centers, emergency communications facilities, and utility infrastructure outside the Very High Fire Hazard Severity Zone.

Policy SAF-7.2: Reduce the risk of loss of life, personal injury, and property damage resulting from fire hazards and wildfire through code enforcement to protect residents and businesses from structural fires and wildfire.

Action Program SAF-7.2.a: Continue to inspect businesses, public buildings, and multi-family dwelling complexes regularly for fire and safety code violations, as required by the State Fire Marshal's office.

Action Program SAF-7.2.b: Continue to implement the most recent updated versions of the California Fire Code, the International Fire Code, and Appendix A of the International Wildland Urban Interface Code standards (as amended and adopted by the City of Larkspur) for all new construction and applicable remodeling or additions, as determined by the Fire Chief. Consistent with the Marin County CWPP, promote home hardening using fire-resistant materials and construction methods.

Action Program SAF 7.2.c: Enforce fire safety codes requiring fire suppression, management of combustible materials, and fuel and ignition sources in conjunction with construction activities and vegetation management/tree removal.

Action Program SAF 7.2.d: Request Fire Department review of City requirements for peak-load water supply and roadways (especially on hillsides) to determine whether those provisions need modification to meet evolving State standards, such as limiting narrow roads or one-way road use, grade/slope limits, minimum turning radius, and turnaround widths, to ensure adequate fire protection and suppression.

Action Program SAF 7.2.e: Evaluate redevelopment potential after a large fire in Larkspur. Develop requirements for rebuilding after a disaster so redevelopment meets all current state and local wildfire protection building code requirements relevant to the particular Fire Hazard Severity Zone of the Project, including requirements for adequate defensible space, home hardening, adequate water supply, and adequate access and evacuation routes.

Action Program SAF 7.2.f: Prohibit new development and land divisions in very high and High Fire Hazard areas unless the availability of adequate and reliable water for fire suppression is provided; access for firefighting vehicles and equipment, as well as evacuation for residents, is provided from more than one point; necessary fire trails and fuel breaks are provided; structures are built consistent with the most current building code and fire code requirements for home hardening; and adequate clearances from structures and use of fire-resistant plants in any landscaping is required.

Action Program SAF 7.2.g: A Fire Protection Plan will be prepared and approved for new development within the Very High Fire Hazard Severity Zone. The main components of this plan will include at least (1) a risk analysis; (2) fire response capabilities; (3) fire safety requirements—defensible space, infrastructure, and building ignition resistance; (4) mitigation measures and design considerations for non-conforming fuel modification; (5) wildfire education and limitations; (6) long-term maintenance of fire hazard reduction projects; and (7) evacuation planning. The plan will require that new development meets all

current building code and fire safety standards, including ensuring the provision of an adequate water supply for fire suppression and fire flow requirements; providing sufficient road width and road clearance for emergency vehicles and equipment, along with evacuation for residents, which should be provided from more than one point; and identifying and maintaining defensible space around structures and that structures are built consistent with the most current building code and CAL FIRE requirements for Very High Fire Hazard Severity Zones.

Action Program SAF 7.2.j: Collaborate with the MWPA Ecologically Sound Practices Partnership, which focuses on developing Best Management Practices (BMPs) for fuel reduction projects in wildlands and provides subject matter expertise for environmental regulatory compliance. Use the best fuel reduction methods (depending on the time of year, fuel types, reduction prescriptions, presence of sensitive biological resources, and cost) to implement the Marin County CWPP and MWPA projects.

Action Program 7.2.k: For SB 99 (Nielsen 2019) "Evacuation Constrained Parcels," work with the MWPA to continue to identify constrained parcels and develop alternate evacuation routes or other measures to reduce risk to these constrained parcels. Include evacuation and access route planning in the updated Local Hazard Mitigation Plan (LHMP).

Policy SAF-7.3: Coordinate with the Marin County Fire Department Office of Emergency Management, other local fire departments, state and federal fire protection agencies, and local organizations, such as FireSafe Marin, Firewise Sites and Neighborhood Response Groups (NRG), and Fire Site Councils, with respect to fire suppression, rescue, mitigation, long-term maintenance of fire hazard reduction projects, training, and education.

Action Program SAF-7.3.a: Implement actions pertinent to fire hazards listed in the MJHMP.

Action Program SAF-7.3.b: Implement a regional fire management plan with the MWPA and Central Marin Fire Department. Develop a collaborative, proactive approach to manage wildfire losses by identifying hazard risks and enacting effective mitigation strategies.

Policy SAF-7.4: Manage public lands as appropriate and feasible to minimize the chances of a wildfire affecting residences and businesses while maintaining habitat functions and values. Work with the Marin County Open Space District and Marin Municipal Water District to assess and reduce the wildland fire hazards on their holdings within and adjacent to the City.

Action Program SAF 7.4.d: Continue to work with the Central Marin Fire Department to encourage the Marin County Open Space District and Marin Water to facilitate creation of fuel reduction and shaded fuel breaks along the perimeter of their lands where they abut residential lots in the City.

Action Program SAF-7.4.e: Work with Marin Water to prioritize fire flow upgrades in the Very High Fire Hazard Severity Zone to meet a goal, where feasible, of 1,000 gallons per minute for 2 hours (City of Larkspur 2024).

3.17.1.2 Environmental Setting

Wildfires are unplanned fires that occur in vegetated areas, such as forests, grasslands, and rangelands, and are a common hazard in the western U.S. These events typically occur during the summer and fall months when dry conditions and weather patterns heighten fire potential. Wildfire season is generally defined by the period between the onset of the first large fire and the containment of the last major fire. Marin County sits in one of the world's five Mediterranean climate zones, which include just 2% of the earth's land but 20% of the plant species. Mediterranean climates are typically characterized by cool, wet

winters with infrequent freezing conditions, followed by extended dry periods during the summer and fall when temperatures are warm to hot, and precipitation is minimal.

CAL FIRE has identified areas of wildfire hazard throughout the state through its Fire and Resource Assessment Program. These maps classify lands into Fire Hazard Severity Zones based on factors such as vegetation, fire history, topography, weather conditions, and development patterns that may contribute to wildfire risk. Lands where CAL FIRE has primary responsibility for wildland fire protection, typically in unincorporated areas, are designated as SRAs. Areas where local agencies, such as the Central Marin Fire Department, provide fire protection services are designated as Local Responsibility Areas (LRAs). The Project is located in an LRA, meaning the responsibility of preventing and suppressing wildfires is primarily the responsibility of a local agency. The closest SRAs are classified as Moderate Fire Hazard Severity Zones and are approximately 1.8 miles west and 2.3 miles south of the Project area (CAL FIRE 2025). The Project area is separated from these SRAs by the Corte Madera Creek, which forms a nonflammable break between the Project area and the nearest wildland fire hazard areas. Given that separation and distance of over a mile and a half, the project is not in or near an SRA for purposes of the Appendix G wildfire thresholds. At the local level, areas where residential development occurs adjacent to undeveloped wildland vegetation are identified as part of the Wildland Urban Interface, where wildfire risk is elevated. According to the wildland urban interface map (USFS 2020), the Project area is within a Non-Vegetated or Agriculture area consisting of low and very low housing density and medium and high housing density. Therefore, the proposed Project is not within a Wildland-Urban Interface area and is not located in an area identified as a wildfire hazard area.

3.17.2 Environmental Impacts

3.17.2.1 Methodology

All Build Alternatives are within a developed area of the City of Larkspur containing paved parking surface lots. Wildfire impacts were evaluated uniformly across the proposed Project and alternatives because each alternative would occur under similar site conditions and be expected to result in comparable wildfire risk.

The wildfire analysis considers the proposed Project site and the surrounding area, including proximity to SRAs and Very High Fire Hazard Severity Zones. The evaluation focuses on potential effects related to emergency response access, evacuation, and consistency with applicable federal, state, and local wildfire regulations. Information sources include the *City of Larkspur 2040 General Plan* (City of Larkspur 2024), applicable mapping databases, and CAL FIRE resources.

3.17.2.2 Thresholds of Significance

The following significance thresholds, based on Appendix G of the California Environmental Quality Act Guidelines, are used to evaluate whether the Project would result in significant impacts related to wildfire.

If in or near SRAs or lands classified as Very High Fire Hazard Severity Zones, would the proposed Project do the following:

- Substantially impair an adopted emergency response plan or emergency evacuation plan?
- Because of slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes?

3.17.2.3 Impacts

As described in Section 3.17.1.2, the Project area is not located in or near an SRA or land classified as a Very High Fire Hazard Severity Zone. The Appendix G wildfire thresholds are nonetheless analyzed below for the Build Alternatives. Existing conditions are large, paved parking areas with little to no vegetation. Future conditions would add concrete parking garages to the site. Project wildfire impacts are substantively the same for both Build Alternatives. Within this section, impacts for Alternative 1 and Alternative 2 are discussed together as the Build Alternatives.

Substantially Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan

Construction

Build Alternatives

Construction of the proposed Project would result in construction related traffic on Larkspur Landing Circle and Sir Francis Drake Boulevard associated with soil import/export or material delivery. Construction activities could intermittently affect adjacent sidewalks, walkways, and roadways because of staging activities. Where such conditions occur, traffic control measures would be implemented to maintain access, including rerouting pedestrians, posting signage, and managing vehicle circulation. No long-term lane closures on Larkspur Landing Circle or Sir Francis Drake Boulevard are anticipated. Coordination with Larkspur Public Works, Central Marin Fire Department, and the Central Marin Police Authority would occur as needed to ensure adequate emergency access. Implementation of the proposed Project would not require revisions to the Marin OA EOP or other local emergency plans. Therefore, construction would not substantially impair or interfere with emergency response or evacuation plan, and impacts would be *less than significant*. No mitigation required.

Operation

Build Alternatives

Access to the Main Lot and ferry terminal area would continue to operate as it does today, using the existing terminal loop driveway and the Sir Francis Drake Boulevard/Larkspur Landing Circle West intersection. Access to the North Lot would continue to be provided from Larkspur Landing Circle West. The Build Alternative parking garages would be designed to provide adequate emergency vehicle access in accordance with applicable fire and building code requirements, including appropriate vehicle turning clearance and vertical clearances for emergency response vehicles. Emergency access through the North Lot parking garage to the Sonoma-Marin Area Rail Transit (SMART) station and parking lot would also be maintained. Emergency vehicles would continue to access the Project site from the surrounding roadway network, including United States Highway 101 and Sir Francis Drake Boulevard.

Although the Project would generate additional vehicle traffic associated with increased ferry ridership, it would not alter the surrounding roadway network, eliminate existing access points, or restrict emergency vehicle circulation in the project vicinity. Nor would it meaningfully alter site access, circulation, or surrounding roadway conditions (refer to Section 3.14, Transportation). Therefore, operation of the proposed Project would not substantially interfere with emergency response or evacuation plans, and impacts would be *less than significant*. No mitigation required.

Mitigation Measures

No mitigation required.

Due to Slope, Prevailing Winds, and Other Factors, Exacerbate Wildfire Risks, and Thereby Expose Project Occupants to Pollutant Concentrations from a Wildfire or the Uncontrolled Spread of a Wildfire

Construction

Build Alternatives

The proposed Project site is not within a Very High Fire Hazard Severity Zone (CAL FIRE 2025) and is within a fully developed urban area of Larkspur. The North Lot is on a paved, flat site that is not susceptible to wildfire. The North Lot will be accessed from Larkspur Landing Circle for construction personnel and will be closed to parking during construction. The Main Lot and Larkspur Ferry Terminal (LFT) is on a paved, flat site that is not susceptible to wildfire. The Main Lot will be accessed off Sir Francis Drake Boulevard for construction personnel. Access to the LFT will be maintained for emergency vehicles and transit, as well as pedestrian and bicycle access during construction. No day use parking for ferry users will be available at the LFT during construction. If a wildfire were to occur and result in hazardous conditions related to pollutant concentrations, construction activities would stop until it is determined that that it is safe to resume work, or workers would use sufficient personal protective equipment in accordance with Occupational Safety and Health Administration requirements to avoid exposure to pollutants. As a result, construction of the proposed Project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire and impacts would be *less than significant*. No mitigation required.

Operation

Build Alternatives

Operation of the proposed Project would not exacerbate wildfire risks related to slope, prevailing winds, or other site-specific factors. The proposed Project involves improvements to an existing, developed facility and would not substantially alter site conditions, topography, or exposure to wind patterns.

The proposed Project involves the addition of concrete parking garages to existing paved lots and would not introduce new ignition sources or features that would increase the potential for wildfire spread. The site consists of impervious fire-resistant surfaces, consistent with existing conditions. The LFT functions like a park and ride, with users spending little time onsite. If a wildfire were to occur and result in hazardous conditions with the potential to impact ferry riders, the LFT would be closed, and the ferry would stop operations until it was determined that it was safe to resume operations. As a result, the proposed Project would not increase exposure to occupants to wildfire-related pollutant concentrations or contribute to the uncontrolled spread of wildfire and impacts would be *less than significant*. No mitigation required.

Mitigation Measures

No mitigation required.

Require the Installation or Maintenance of Associated Infrastructure (Such as Roads, Fuel Breaks, Emergency Water Sources, Power Lines, or Other Utilities) that may Exacerbate Fire Risk or that may Result in Temporary or Ongoing Impacts on the Environment

Construction

Build Alternatives

Construction of the proposed Project would occur on existing paved sites within urbanized areas with existing utilities. The contractor will use existing utilities and supplement as necessary with temporary generators or water hauling and does not require any new infrastructure, such as fuel breaks, emergency water sources, or utility extensions that could exacerbate wildfire risk. Construction of the Build Alternatives would not exacerbate fire risk or related impacts on the environment, and impacts would be *less than significant*. No mitigation required.

Operation

Build Alternatives

Operation of the proposed Project would not require new or expanded infrastructure that could exacerbate wildfire risk. The proposed Project involves parking improvements at an existing paved facility, located on a flat, low-lying area, adjacent to the San Francisco Bay. The Build Alternatives would be connected to existing utilities and would not introduce features such as new roadways, fuel breaks, or utility systems that would increase fire hazards. Therefore, operation of the proposed Project would result in *no impacts* that would exacerbate fire risk or result in associated wildfire impacts on the environment.

Mitigation Measures

No mitigation required.

Expose People or Structures to Significant Risks, Including Downslope or Downstream Flooding or Landslides, as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes

Construction

Build Alternatives

Construction of the Build Alternatives would be located at existing paved facilities on a flat, low-lying areas within an urbanized area, adjacent to the San Francisco Bay. Neither the North Lot nor Main Lot are susceptible to wildfire. Construction of the proposed Project would occur at an existing developed facility and would not substantially alter the site topography, slope conditions, or drainage patterns. The Build Alternatives would result in *no impacts* that would expose people or structures to significant wildfire risks associated with runoff, instability, or drainage changes.

Operation

Build Alternatives

Operation of the proposed Project would not change existing site conditions that would affect runoff, slope stability, or drainage. The proposed Project involves improvements to an existing parking facility,

and the addition of a new parking garage would not introduce substantial changes to site grading. Impervious surfaces would remain largely similar to preconstruction conditions.

In addition, the proposed Project is on a flat, low-lying area, adjacent to the San Francisco Bay, in an urbanized area outside of a Fire Hazard Severity Zone (CAL FIRE 2025) and is not subject to wildfire-related risks, such as post-fire slope failure, debris flows, or downstream flooding. Therefore, the proposed Project would not expose people or structures to increased risks from runoff, slope instability, or drainage changes associated with wildfire. Impacts would be *less than significant*. No mitigation required.

Mitigation Measures

No mitigation required.