

3.4 Cultural Resources

The term *cultural resources* refers to sites, objects, buildings, structures, burials, districts, and landscapes. In this section, buildings, structures, districts, and landscapes will be referred to as *built-environment resources* and sites, objects, and burials as *archaeological resources*. Some archaeological sites may also be considered tribal cultural resources. Tribal cultural resources are discussed in Section 3.15. A *historical resource* is defined in California Environmental Quality Act (CEQA) Section 21084.1 and State CEQA Guidelines Section 15064.5 as one that meets at least one of the following criteria:

- A resource listed in or determined by the State Historical Resources Commission to be eligible for listing in the California Register of Historical Resources (CRHR) shall be considered to be historically significant (California Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g) shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4852).

A lead agency is allowed to determine that a resource may be a historical resource, as defined in PRC Sections 5020.1(j) or 5024.1, even if it is not listed in, or determined to be eligible for listing in, the CRHR; not included in a local register of historical resources, pursuant to PRC Section 5020.1(k); or identified in a historical resources survey meeting the criteria of PRC Section 5024.1(g).

3.4.1 Existing Conditions

3.4.1.1 Regulatory Setting

The Golden Gate Bridge, Highway and Transportation District (District), as the owner of the Larkspur Ferry Terminal (LFT), is the CEQA Lead Agency for the Larkspur Ferry Service Expansion and Parking Project (Project) and has prepared this Draft Environmental Impact Report (DEIR) to evaluate potential impacts and identify required mitigation to avoid or reduce potentially significant impacts. The federal, state, and regional and local regulations applicable to the Project are provided in this section.

Federal

Although the proposed Project is not anticipated to require compliance with Section 106 of the National Historic Preservation Act at this time, the National Register of Historic Places (NRHP) and federal guidelines related to the treatment of cultural resources are relevant for the purposes of determining whether cultural resources, as defined under CEQA, are present and guiding the treatment of such resources. The following sections summarize the relevant federal regulations and guidelines.

National Historic Preservation Act and National Register of Historic Places

Built-environment and archaeological resources are protected through the National Historic Preservation Act (16 United States Code [U.S.C.] 470f). The National Historic Preservation Act requires project review for effects on historic properties only when projects involve federal funding or permitting or occur on federal land; therefore, it is not applicable to discretionary actions at the municipal level. However, the National Historic Preservation Act establishes the NRHP, which provides a framework for resource evaluation and informs the process of determining impacts on historical resources under CEQA.

The NRHP is the nation's official comprehensive inventory of historic resources. Administered by the National Park Service, the NRHP includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Typically, a resource that is more than 50 years of age is eligible for listing in the NRHP if it meets any one of the four eligibility criteria and retains sufficient historical integrity. A resource less than 50 years old may be eligible if it can be demonstrated that it is of "exceptional importance" or a contributor to a historic district. NRHP criteria are defined in *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (NPS 1997).

Properties that are listed in the NRHP, as well as properties that are formally determined to be eligible for listing in the NRHP, are automatically listed in the CRHR and therefore considered historical resources under CEQA.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (16 U.S.C. 470aa et seq.) was enacted in 1979 to provide more effective law enforcement to protect public archaeological sites. The Archaeological Resources Protection Act provides detailed descriptions of the prohibited activities and larger financial and incarceration penalties for convicted violators.

Archaeological and Historic Preservation Act

The Archaeological and Historic Preservation Act (16 U.S.C. Sections 469–469[c]-2) provides for preserving significant historic or archaeological data that may otherwise be irreparably lost or destroyed by construction of a project by a federal agency or under a federally licensed activity or program. This includes relics and specimens.

State

California Environmental Quality Act

CEQA, as codified in PRC Section 21000 et seq. and implemented by the State CEQA Guidelines (14 CCR Section 15000 et seq.), is the principal statute governing environmental review of projects in California. CEQA defines a historical resource as a property listed in, or eligible for listing in, the CRHR; included in a qualifying local register; or determined by a lead agency to be historically significant. To be considered a historical resource, a property must generally be at least 50 years old. Section 21084.1 of the PRC and Section 15064.5 of the State CEQA Guidelines define a historical resource for purposes of CEQA.

CEQA requires lead agencies to determine whether a proposed project would have a significant effect on important historical resources or unique archaeological resources. If a resource is neither a unique archaeological resource nor a historical resource, the State CEQA Guidelines note that the effects of the project on that resource shall not be considered a significant effect on the environment (State CEQA

Guidelines Section 15064.5[c][4]). In addition, projects that comply with the secretary's standards benefit from a regulatory presumption under CEQA that they would have a less-than-significant impact on a historical resource (14 CCR 15126.4[b][1]). Projects that do not comply with the secretary's standards may or may not cause a substantial adverse change in the significance of a historical resource and must be subject to further analysis to assess whether they would result in material impairment of a historical resource's significance.

Under CEQA, a substantial adverse change in the significance of a resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Actions that would materially impair the significance of a historical resource are any actions that would demolish or adversely alter the physical characteristics that convey the property's historical significance and qualify it for inclusion in the CRHR, the NRHP, or in a local register or survey that meets the requirements of PRC Sections 5020.1(k) and 5024.1(g).

California Register of Historical Resources

The CRHR is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and indicating which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The CRHR criteria are based on the NRHP criteria (PRC Section 5024.1[b]). Certain resources are determined by CEQA to be automatically included in the CRHR, including California properties formally eligible for or listed in the NRHP. To be eligible for the CRHR as a historical resource, a resource must be significant at the local, state, or federal level under one or more of the following evaluative criteria, as defined in PRC Section 5024.1(c):

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. The resource is associated with the lives of persons important in our past.
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

As with the NRHP, a significant historical resource must possess integrity in addition to meeting the significance criteria to be considered eligible for listing in the CRHR. Consideration of integrity for evaluation of CRHR eligibility follows the definitions and criteria from the National Park Service's *National Register Bulletin Number 15* (NPS 1997).

Assembly Bill 52

Tribal cultural resources were identified as a distinct CEQA environmental category with the adoption of Assembly Bill (AB) 52 in September 2014. Tribal cultural resources impacts and mitigation measures are discussed in Section 3.15. Cultural resources, in particular precontact Native American archaeological sites such as shellmounds commonly found in the San Francisco Bay Area, may also be considered tribal cultural resources by California Native American tribes. For all projects subject to CEQA that received a notice of preparation, notice of negative declaration, or mitigated negative declaration on or after July 1, 2015, AB 52 requires the lead agency on a proposed project to consult with the geographically affiliated California Native American tribes. The legislation creates a broad new category of environmental resources, tribal cultural resources, which must be considered under CEQA. AB 52 requires a lead agency

to not only consider the resource's scientific and historical value but also whether it is culturally important to a California Native American tribe.

AB 52 defines tribal cultural resources as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are included or determined to be eligible for inclusion in the CRHR; included in a local register of historical resources, as defined in PRC Section 5020.1(k); or determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria of PRC Section 5024.1(c) (CEQA Section 21074).

AB 52 also sets up an expanded consultation process. For projects initiated after July 1, 2015, lead agencies are required to provide notice of the proposed projects to any tribe that is traditionally and culturally affiliated with the geographic area that requested to be informed by the lead agency, following PRC Section 21018.3.1(b). If, within 30 days, a tribe requests consultation, the consultation process must begin before the lead agency can release a draft environmental document. Consultation with the tribe may include discussion of the type of review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. The consultation process will be deemed concluded when either (1) the parties agree to mitigation measures or (2) any party concludes, after a good-faith effort, that an agreement cannot be reached. Any mitigation measures agreed to by the tribe and lead agency must be recommended for inclusion in the environmental document. If a tribe does not request consultation or to otherwise assist in identifying mitigation measures during the consultation process, a lead agency may still consider mitigation measures if the agency determines that a project will cause a substantial adverse change to a tribal cultural resource.

Assembly Bill 168

AB 168, adopted in September 2020, provides additional protection for tribal cultural resources as defined in AB 52. This bill applies in situations where a developer seeks to streamline approval under Senate Bill (SB) 35 and, in doing so, bypasses CEQA requirements. AB 168 rectifies a loophole in SB 35 that allowed developers to apply for fast-tracked approval without notifying Native American tribes affiliated with the project area. Instead, under AB 168 projects would be ineligible for SB 35 and subject to CEQA if (1) the site of the proposed development is a tribal cultural resource that is on a national, state, tribal, or local historic register list, (2) the local government and the California Native American tribe do not agree that no potential tribal cultural resource would be affected by the proposed development, or (3) the local government and California Native American tribe find that a potential tribal cultural resource could be affected by the proposed development and the parties do not document an enforceable agreement regarding the methods, measures, and conditions for treatment of those tribal cultural resources, as provided.

Local

Marin County Ordinance 1589

The Marin County Code of Ordinances includes Ordinance 1589, which outlines procedures related to protecting archaeological resources in the county. Such protection procedures include the following:

- Requirement of a permit to excavate an Indian midden (Section 5.32.020)
- Designation of a liaison agency between institutions of higher learning or an association and the department of public works for the purpose of the study of Indian relics of archaeological significance (Section 5.32.030)

- Requirement of permits to excavate Indian middens to follow formats approved by the director of public works and to note that the excavation is for either archaeological or nonarchaeological purposes (Section 5.32.040)
- Requirement for the director of public works or designee to send the application for excavation to the liaison agency and, within 5 days of receipt, for the liaison agency to inform the director of public works if the midden is of archaeological significance; only nonarchaeological midden sites will be issued a permit (Section 5.32.050)
- If the midden requesting permit for excavation is certified to have archaeological significance, allowance for the director of public works to issue a permit with certain conditions (Section 5.32.060)
- Requirement for actions done under an issued permit to follow the permit's terms and conditions (Section 5.32.070)
- Requirement that persons in violation of the chapter's provisions are guilty of a misdemeanor and shall incur punishments as listed under Section 1.04.270; violations that occur on multiple days will each be considered as separate violations per day (Section 5.32.090)

The conditions of Section 5.32.050 are as follows:

- A. Prior to nonarchaeological excavation or removal of materials from the middens, the permittee shall not excavate for a period of sixty days to allow archaeological excavation of the site.
- B. The permittee or owner of the property shall be required to grant a license for the excavation, identification, and classification of artifacts and proper scientific analysis of materials having historical or archaeological significance to recognized institutions of higher learning or associations having as their major purpose the study of Indian relics and other sites having archaeological value. The terms of the license shall be such as are agreed to by the prospective licensee and property owner (Ord. 1825 § 2, 1971; Ord. 1589 § 6, 1967).

Larkspur Municipal Code

The City of Larkspur's Municipal Code outlines the duties of the Planning Commission, which oversees the implementation of two ordinances regarding cultural resources.

Chapter 18.19 of the Municipal Code, Heritage Preservation

The Larkspur Municipal Code includes Chapter 18.19, which states the purpose of the City of Larkspur's historic preservation Municipal Code and reasons for the protection of historic resources. The purpose of the chapter is to provide for the health, safety, and general welfare through preservation of historic resources. The intent is to provide for the review, evaluation, enhancement, protection, and preservation of natural phenomena, structures, sites, and areas that possess unique character, special architectural appearance, or historical value or which generate special aesthetic or cultural interest. The quality of life within the community will be enhanced through the development and maintenance of appropriate settings and environments for historic resources. (Ord. 1030 § 2[12], 2018; Ord. 975 § 3, 2011; Ord. 592 § 5 [part], 1978).

The Municipal Code defines a historic resource as a structure, site, area, or natural feature that has significance because of its association with important historical events or persons, distinctive architectural characteristics, or its contribution to the overall historic character of an area. Examples include properties representing a particular architectural style, period, or method of construction or those possessing unique aesthetic or cultural qualities. These locally defined historic resources are generally consistent with the

concept of historical resources under CEQA. (Ord. 1030 § 2[12], 2018; Ord. 975 § 3, 2011; Ord. 592 § 5 [part], 1978)

The City of Larkspur maintains an official Historic Resources Inventory adopted by City Council resolution. Properties listed on the inventory are recognized as historically significant and are subject to the requirements of the Heritage Preservation Ordinance. Projects affecting listed properties typically require discretionary review, including building, grading, or demolition permits. For purposes of CEQA, the inventory functions as a local register of historical resources.

The Municipal Code establishes a combining Heritage Preservation zoning district that may be applied to properties or areas determined to have historic value. The Heritage Preservation overlay provides additional regulatory controls to ensure that development and alterations are compatible with historic character and do not adversely affect designated resources or districts. (Ord. 1030 § 2[12], 2018; Ord. 975 § 3, 2011; Ord. 592 § 5 [part], 1978).

Projects involving the alteration, relocation, or demolition of historic resources or properties within designated districts are subject to review under Chapter 18.19. The ordinance requires discretionary review of such projects to ensure consistency with preservation standards and policies.

Chapter 18.19.035 also specifies projects subject to Historic Preservation Review. Except for work that meets the provisions of Larkspur Municipal Code Sections 18.19.025 and 18.19.060, a discretionary land use permit, building permit, grading or demolition permit for properties listed on the official Historic Resources Inventory, determined to be eligible for inclusion on the Historic Resources Inventory, or located within the Heritage Preservation zoning district shall be subject to the requirements of this chapter (Ord. 1030 § 2[12], 2018; Ord. 975 § 3, 2011).

Chapter 18.19.040 requires the Heritage Preservation Board to review the exterior modifications or demolition of all projects subject to Chapter 18.19.035.

In reviewing proposals, the Heritage Preservation Board evaluates whether the project would do the following:

- Be compatible with the architectural character of the historic resource and surrounding context.
- Maintain the integrity of the resource.
- Avoid adverse effects on the historic, architectural, or aesthetic character of the resource or neighborhood.
- Comply with applicable federal, state, and local preservation standards.

For demolition requests involving historic resources, the Heritage Preservation Board may delay approval to allow for completion of environmental review under CEQA and to evaluate alternatives to demolition, such as relocation, adaptive reuse, or identification of a preservation-minded purchaser (Ord. 1030 § 2[12], 2018; Ord. 975 § 3, 2011; Ord. 953 § 1[22], 2007; Ord. 857 § 5 [part], 1993; Ord. 782 § 1, 1989; Ord. 592 § 5 [part], 1978).

Following review by the Heritage Preservation Board, the Planning Commission or Zoning Administrator acts on project applications, considering the Heritage Preservation Board's recommendations. This discretionary review process provides a mechanism to avoid or minimize impacts to historic resources through project modifications or conditions of approval.

Chapter 15.42 of the Municipal Code, Archaeological Resources

Chapter 15.42 (Archaeological Resources) establishes procedures to study, preserve, and protect archaeological resources within the City of Larkspur. The ordinance recognizes that subsurface materials, such as shell deposits, bone, and artifacts associated with early inhabitants, may provide critical information about the area's history and that uncontrolled disturbance could result in irreversible loss of scientific and cultural data. Protection of archaeological integrity is therefore considered to be in the public interest.

The Municipal Code defines an "archaeological resource" as any evidence of human occupation or activity, including sites, features, artifacts, environmental data, and physical remains predating approximately 1860. The ordinance distinguishes between recorded resources identified in state or federal inventories and unrecorded resources that may be encountered during ground-disturbing activities. This definition is consistent with CEQA's treatment of archaeological resources as a category of historical resources under CEQA Guidelines Section 15064.5. (Ord. 1094 § 15, 2026; Ord. 571 § 1 [part], 1977).

Chapter 15.42 requires an archaeological investigation permit before excavation or disturbance of any archaeological resource. The ordinance provides the following:

- Disturbance of archaeological resources without a permit is prohibited.
- Projects affecting recorded archaeological resources must obtain a permit prior to issuance of building or grading permits.
- If a resource is encountered during construction, all work in the vicinity must cease and applicable permits or approvals may be suspended until appropriate evaluation is completed. (Ord. 1094 § 16, 2026; Ord. 1077 § 2, 2024; Ord. 1062 § 14, 2022; Ord. 571 § 1 [part], 1977).

These provisions ensure that archaeological resources are properly identified and evaluated before or during project implementation.

The permit review process and CEQA integration require preparation of an archaeological report by a qualified archaeological advisory agency to describe the resource, evaluate its significance, and recommend appropriate protection or data recovery measures. The Planning Commission evaluates the findings and may approve the permit only after determining that appropriate mitigation measures will be implemented to ensure maximum protection or preservation of knowledge.

The ordinance explicitly allows findings from an Environmental Impact Report to be used in lieu of a separate archaeological report, thereby integrating local regulatory requirements with CEQA environmental review.

Where archaeological resources are determined to be significant, the City of Larkspur may require mitigation measures as conditions of approval. Such measures may include the following:

- Avoidance through project redesign
- Controlled excavation and scientific data recovery
- Onsite monitoring by a qualified archaeologist during construction
- Preparation of technical reports and curation of recovered materials

The ordinance requires that discovered resources be evaluated under CEQA significance criteria and that appropriate documentation and reporting be completed.

Chapter 15.42 establishes procedures for inadvertent discovery of archaeological resources during construction. These include the following:

- Immediate cessation of work within a defined radius
- Evaluation by a qualified archaeologist
- Documentation of the resource using standard forms
- Consultation with Native American tribes if a tribal cultural resource is identified

If a resource is determined to be significant under CEQA, feasible avoidance, preservation, or data recovery measures must be implemented.

The Municipal Code requires that records of archaeological investigations be maintained and filed with appropriate state and federal agencies, with copies curated at recognized academic or research institutions to ensure long-term preservation of data.

The City of Larkspur 2040 General Plan

In 2024, the City of Larkspur adopted *The City of Larkspur 2040 General Plan* to guide future planning efforts and development in the city. *The City of Larkspur 2040 General Plan* includes the following goal and policies related to the protection of built environment and archaeological resources (City of Larkspur 2024).

Goal LU-4.6, Downtown Policies: Maintain the architectural and historic character of Downtown and the surrounding neighborhoods.

Chapter 4: Community Character (Background):

Larkspur's historic resources. Historic resources, as discussed in this General Plan, generally include features of the built environment, artifacts, and documents from the City of Larkspur's past that have been preserved or otherwise exist in approximation to their original state. Notable historic features of the built environment include the Historic Downtown District, the Alexander Avenue bridge, the Dolliver House, and the Remillard Brick Kiln. These reminders of the City of Larkspur's past are highly valued by City residents, business owners, and visitors alike, and their continued preservation is integral to the community's character (City of Larkspur 2024).

Larkspur's archaeological and tribal cultural resources. Archaeological resources are the material remains of past human life, culture, or activities. Historic archaeological resources may include buried remains of built structures or artifacts dating from the City of Larkspur's settlement by Europeans. Precontact archaeological resources in the City of Larkspur include several known Native American sacred sites, which are protected under state and federal law. Tribal cultural resources may include a site, feature, place, habitat, landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register or included in a local register of historical resources. The Federated Indians of Graton Rancheria (FIGR), a federally recognized tribe and sovereign government, remains responsible for preserving the culture of the Coast Miwok people throughout its tribal territory, including the City of Larkspur. FIGR may at its discretion choose to treat a resource as a tribal cultural resource. The City has and will continue to ensure the continued protection of all archaeological and tribal cultural resources existing within its Planning Area (City of Larkspur 2024).

Heritage Preservation

Goal CHAR-3: Maintenance of Larkspur's special "sense of place"

Policy CHAR-3.3: Safeguard and maintain significant historic and natural resources, as defined and listed in the Historic Resources Inventory, the California Historic Resource Information System, and in conservation land use categories on the Land Use Map, while allowing new housing consistent with state law and the Housing Chapter. Applicable Action Programs are listed as follows:

Action Program CHAR-3.3.a: Apply the City's Heritage Preservation development standards and design review findings, when appropriate, and ensure compliance with applicable State laws during project review and construction.

Action Program CHAR-3.3.b: Apply the "H" Combining Heritage Preservation Zoning District to significant historic building sites or places identified on the Historic Resources Inventory. Insofar as possible, seek the cooperation of property owners for historic designation and zoning.

Action Program CHAR-3.3.e: As appropriate, apply California Historical Building Code standards and any successive standards that are adopted to the rehabilitation, renovation, and repair of historic structures in Larkspur (City of Larkspur 2024).

Archaeological and Tribal Cultural Resources

Goal CHAR-4: Awareness of and sensitivity toward Larkspur's archaeological and tribal cultural resources

Policy CHAR-4.1: Consult and cooperate with the California Native American Heritage Commission, the FIGR, and the Northwest Information Center to identify, protect, and preserve Native American archaeological sites and tribal cultural resources. Action Programs applicable to the proposed project are listed as follows:

Action Program CHAR-4.1.a: As required by the State Public Resources Code, notify FIGR (or other appropriate Tribe(s)), if recommended by the NAHC [Native American Heritage Commission], when a project application is complete, or when a draft General Plan update or amendment is proposed, or designated open space is proposed to determine whether the Tribe(s) chooses to engage in the formal consultation process defined by State law. If consultation is requested, complete the consultation process as defined by State law.

Action Program CHAR-4.1.b: Comply with the State Public Resources Code requirements regarding notifications, assessments and disposition of resources, mitigation (including permanent conservation easements), confidentiality requirements, and other requirements enacted for review and protection of cultural and tribal cultural resources.

Action Program CHAR-4.1.d: Treat with respect and dignity any human remains discovered at a project site and ensure full compliance with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

Action Program CHAR-4.1.e: At the initial application stage for new projects that would involve disturbance of soils, inform project applicants of the legal mandates incumbent on the applicant and his/her contractors not to damage or remove archaeological resources and tribal cultural resources. Explain the City's duty and intent to notify FIGR

about the project once the City deems the application complete. Encourage applicants to contact FIGR prior to completing the application to avoid the need to subsequently revise the project design if the Tribe requests, and the City concurs, that such changes are needed to avoid damage or disturbance of tribal cultural resources. Alternatively, the project applicant can request that the City initiate this early consultation with FIGR.

Policy CHAR-4.2: Ensure that the loss of archaeological and tribal cultural resources is avoided, when feasible, or mitigated appropriately. Action Programs applicable to proposed project are listed as follows:

Action Program CHAR-4.2.b: When a project is found to be in proximity to a known Native American or historic archaeological site, City staff will work in conjunction with a professional archaeologist, or FIGR (or other appropriate Tribe[s]), and the Northwest Information Center to determine the particular qualities to be preserved and the methods of preservation.

Action Program CHAR-4.2.c: Comply with the requirements of the California Environmental Quality Act to ensure a complete analysis of potential impacts to Native American and historic archaeological sites and that feasible mitigation options are identified.

Action Program CHAR-4.2.d: Develop guidelines and standards to address situations where a historic or archaeological resource is discovered during any phase of construction and grading activities of ongoing maintenance or ministerial projects that may not be subject to CEQA. Provide a "quick-response" assessment of the site's significance by the City's historic or archaeological consultant and identify appropriate preservation strategies, or tribal consultation if appropriate, before allowing project construction to recommence.

Action Program CHAR-4.2.e: Add the following construction best management practices to the Larkspur Municipal Code Chapter 14.42.040 (C) to follow if a potentially significant archaeological resource or tribal cultural resource is encountered during ground-disturbing activities. Best management practices could include the following:

- All construction activities within a 100-foot radius of the find shall cease until a qualified archaeologist determines whether the resource requires further study.
- All developers, contractors, and subcontractors in the study area shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement.
- Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of the CEQA criteria by a qualified archaeologist.
- If the resource is a tribal resource, the consulting archaeologist shall consult with the appropriate tribe to evaluate the significance of the resource and to recommend appropriate and feasible avoidance, testing, preservation or mitigation measures, in light of factors such as the significance of the find, proposed project design, costs, and other considerations.
- If avoidance is infeasible, other appropriate measures (e.g., data recovery) may be implemented.

- If the resource is a nontribal resource determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant.
- The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources.
- The report shall be submitted to the City of Larkspur, Northwest Information Center, and State Historic Preservation Office, if required (City of Larkspur 2024).

3.4.1.2 Environmental Setting

The environmental setting of the Project area consists of the existing conditions and relevant historical conditions of the CEQA study area, which is limited to the footprints of the Build Alternatives being considered. The CEQA study area is delineated to consider potential impacts on built environment and archaeological resources because of Project activities, including ground disturbance and alteration, relocation, or demolition of buildings in the Project area. The proposed Project could also result in changes to the setting of built-environment resources adjacent to the Project area. There appears to be a very low likelihood that any Project activities would change significant characteristics in the setting of any built-environment historical resource adjacent to the Project area. As such, adjacent built-environment resources that the proposed Project would not physically change are not included in the CEQA study area.

This section describes the environmental and cultural setting of the Project area and surrounding vicinity and provides the context for evaluating the potential presence of historical resources, archaeological resources, human remains, and tribal cultural resources. The discussion relies on previously completed cultural resources investigations, including the *Cultural Resources Report for The Larkspur Ferry Service and Parking Expansion Project: Golden Gate Bridge, Highway and Transportation District* (Appendix D), which provides a comprehensive overview of the natural and cultural history of the Project area.

Paleoenvironmental Setting

The Project area is along the margin of San Francisco Bay, a landscape that has undergone substantial environmental change since the late Pleistocene. During the Last Glacial Maximum, approximately 22,000 years ago, sea levels were more than 100 meters lower than present levels, and the present-day San Francisco Bay was a broad inland valley traversed by the ancestral Sacramento–San Joaquin River system. As global temperatures increased and continental ice sheets melted, sea levels rose rapidly, inundating the valley and gradually forming the modern estuary.

Between approximately 16,000 and 6,000 years before present, rising sea levels transformed the region through shoreline migration, marsh formation, and sediment deposition. These processes buried former land surfaces beneath younger alluvial, marsh, and bay deposits. Numerous geoarchaeological studies conducted throughout the San Francisco Bay region indicate that early Holocene and late Pleistocene landforms are commonly buried beneath several meters of younger sediment. Archaeological deposits associated with early Native American occupation may therefore occur deeply buried beneath later alluvial and estuarine sediments.

The gradual development of tidal marshes and floodplains during the mid- and late Holocene created productive ecological environments that supported prehistoric settlement and resource procurement. Continued sediment accumulation, subsidence, and marsh expansion altered the distribution of natural resources and likely influenced patterns of human occupation over time.

Historic-period modifications have further transformed the landscape through dredging, wetland reclamation, hydraulic mining sedimentation, urban development, and placement of artificial fill. While some archaeological resources may have been disturbed or destroyed by these activities, deeply buried archaeological deposits may remain preserved beneath fill and younger sedimentary deposits.

The long history of landscape evolution in the Bay Area suggests that archaeological resources dating from the earliest periods of human occupation may be buried beneath younger deposits and may not be visible at the ground surface.

Natural Setting

The Project area is on the Marin Peninsula in southern Marin County adjacent to the mouth of Corte Madera Creek and San Francisco Bay. The area occupies land that historically consisted primarily of tidal marsh and mudflat environments that have been substantially modified through filling and development associated with transportation infrastructure, such as the LFT.

The region experiences a Mediterranean climate characterized by cool, wet winters and warm, dry summers. San Francisco Bay and its associated estuarine environments historically supported extensive tidal marshes, riparian corridors, and coastal prairie habitats. These environments provided abundant plant and animal resources, including fish, shellfish, waterfowl, marine mammals, terrestrial mammals, and wetland plants used by Native American populations.

The Project area is within the California Coast Ranges geomorphic province and is underlain by artificial fill, Holocene Bay Mud, older alluvial deposits, and Franciscan Complex bedrock. Throughout the Bay Area, Holocene and Pleistocene deposits have yielded evidence of Native American occupation, including habitation sites, shell middens, and associated cultural deposits. As a result, buried archaeological resources have the potential to occur within native sediments underlying the developed portions of the Project area.

Precontact Cultural Setting

Precontact refers to the period of occupation by Indigenous peoples before arrival of non-Indigenous peoples, which occurred as early as the 1700s in the San Francisco Bay region. Archaeological research indicates that Native American occupation of the San Francisco Bay region may extend back at least 12,000 years and loosely corresponds to the transition from the colder Pleistocene to the warmer Holocene. Twentieth-century investigations documented hundreds of shell mounds and midden sites along the margins of San Francisco Bay. These sites represent former habitation areas and often contain shellfish remains, faunal material, artifacts, features such as hearths, and human burials.

Because precontact sites were established along former shoreline, creeks, and marsh margins of the San Francisco Bay, the gradual expansion of bay waters and changing shoreline because of post-Pleistocene warming beginning roughly 12,000 years ago, has covered ancient archaeological deposits. Sedimentary deposition and artificial fill have buried and obscured some of the oldest evidence of occupation.

The cultural chronology generally recognized for the region includes Paleoindian, Archaic, and Emergent periods. No Paleoindian remains are known from the San Francisco Bay Area, possibly because of the rising sea level and sediment accumulation. Archaeological evidence suggests increasing settlement intensity, technological development, social complexity, and regional exchange networks through time. Native communities maintained permanent villages, participated in extensive trade systems, and used a wide range of terrestrial, freshwater, and marine resources.

Ethnographic Setting

The Project area is within the ancestral territory of the Coast Miwok people. Ethnographic studies indicate that Coast Miwok groups occupied much of present-day Marin County and relied on hunting, fishing, shellfish collection, and the seasonal harvesting of plant resources. Villages were commonly near waterways and resource-rich environments, with smaller seasonal camps and special-use locations distributed across the landscape.

The Project vicinity is believed to have been associated with Coast Miwok groups occupying the Richardson Bay and Corte Madera Creek areas. Ethnographic accounts describe settlements consisting of family dwellings, sweathouses, ceremonial structures, and associated activity areas.

Contemporary descendants of the Coast Miwok include members of the FIGR, a federally recognized tribe and sovereign government responsible for preserving the culture of the Coast Miwok people throughout its tribal territory, including the City of Larkspur. FIGR may at its discretion choose to treat a resource as a tribal cultural resource.

Regional Development

European settlement of Marin County began during the Spanish and Mexican periods and accelerated following California statehood in 1850. Agriculture, dairying, logging, transportation, and maritime commerce became important components of the local economy. Ferry services historically provided critical transportation connections between Marin County and San Francisco and contributed substantially to regional growth and development.

City of Larkspur

The City of Larkspur was established in the late nineteenth century and incorporated in 1908. Its location near Corte Madera Creek and San Francisco Bay facilitated its development as both a residential community and a transportation center. Throughout the twentieth century, population growth, suburban development, and transportation improvements contributed to the city's expansion.

Larkspur Ferry Terminal

The LFT was developed by the District as part of a regional effort to expand public transportation alternatives between Marin County and San Francisco. The terminal site occupies filled marshlands on the San Quentin Peninsula and was constructed between 1975 and 1976.

The terminal was designed by the architectural firm Braccia, DeBrer and Heglund and is recognized as a notable example of Late Modern architecture incorporating High-Tech Structuralist design principles. The facility's defining feature is its triangular steel space-frame roof supported by three prominent structural supports above an open passenger terminal. Since its completion, the terminal has undergone periodic improvements and expansions to accommodate evolving ferry operations while retaining its primary architectural character and function.

The ferry terminal remains an important component of the regional transportation network and serves as a major commuter connection between Marin County and San Francisco.

3.4.2 Environmental Impacts

This section describes the impact analysis related to cultural resources for the proposed Project. The study is focused on the CEQA study area, which is defined as the geographic area where the Project construction and use may directly or indirectly cause changes of character or use of historical resources, such as archaeological sites or built-environment resources. The section describes the methods used to determine the Project-level impacts and lists the thresholds used to conclude whether an impact would be significant under CEQA. Measures to mitigate (that is, avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany the discussion of each identified significant impact, as applicable. Two Build Alternatives, the Increased Ferry Service and New Parking Garages Alternative (Alternative 1) and the Increased Ferry Services, New Parking Garages, and Enhanced Transportation Demand Management Alternative (Alternative 2)—which are all in the City of Larkspur and do not extend beyond 700 feet of the existing ferry terminal boundary—are being evaluated. Impacts for the Build Alternatives are presented together unless they differ substantially.

3.4.2.1 Methodology

The impact analysis for cultural resources was conducted in three stages: (1) inventorying cultural resources within the CEQA study area, (2) identifying those that are historical resources meeting the definition presented in PRC Section 21084.1 and State CEQA Guidelines Section 15064.5 (inclusive of built-environment resources, archaeological resources, and human remains), and (3) evaluating the potential impacts on historical resources. The proposed locations of ferry terminal facility improvements under the Build Alternatives were evaluated for their potential to cause impacts on historical resources during construction and operation. As outlined as follows, a range of methods informed the identification of historical resources that could have the potential to be affected by the construction or operation of the LFT. In accordance with State CEQA Guidelines Section 15064.5(b)(2), the analysis considers the potential for proposed Project activities to materially impair the significance of a historical resource by causing direct changes to the physical characteristics of that resource and by causing changes in its immediate setting. Impacts related to the No-Project Alternative are discussed in Chapter 5, Alternatives to the Project.

Resource Identification Methodology

Several methodologies were employed to inventory cultural resources within the CEQA study area and to identify historical resources, which are those cultural resources listed or eligible for listing in the CRHR.

Northwest Information Center Records Search

The California Historical Resources Information System's Northwest Information Center (NWIC) staff reported results of a records search April 5, 2026. The search of the NWIC database includes previous cultural resources studies and previously recorded cultural resources within the CEQA study area and 0.5-mile radius search area. The date and relative intensity of pedestrian coverage by previous studies of the CEQA study area provides a context for assessing the nature and number of recorded cultural resources that have been previously identified. The records search identified seven previous cultural resources investigations that have covered all or some portion of CEQA study area. Another 31 investigations have been conducted within the larger 0.5-mile study area radius. Table 3.4-1 presents the previous investigations.

Table 3.4-1. Previous Investigations in CEQA Study Area and 0.5-Mile Records Search Study Area

Report Number	Report Year	Report Title	Report Author(s)
Within the CEQA study area			
S-013070	1975	Archaeological Report for Green Brae Brickyard, 125 East Sir Francis Drake Boulevard, Larkspur, California	Madrone Associates
S-016949	1991	A Cultural Resources Evaluation of a Proposed Reclaimed Water Pipeline in the San Quentin Point, Corte Madera, Larkspur, Kentfield and San Rafael Areas	Roop, William
S-040318(a)	2010	Archaeological Survey Report for the Central Marin Ferry Connection Project, Larkspur, Marin County, California, Federal Program #CML 6406 (010), 04-Mrn-101, PM 8.5-8.9	Byrd, Brian F, Michael Darcangelo et al.
S-040318(b)	2011	Historic Property Survey Report, 04 MRN Regional Measure 2 CML 6406 (010) Larkspur 00-000201-09 1	Webb, Toni
S-040319	2011	Archaeological Survey Report for the Central Marin Ferry Connection Project, Larkspur, Marin County, CA, Federal Program #CML 6406 (010), 04- Mrn-101, Pm 8.5-8.9	Byrd, Brian F. and Michael Darcangelo
S-044351	2014	Archaeological Survey Report for the Proposed Freeway Performance Initiative Project, Marin County, California, 04-MRN-101, PM 0.0/27.6, 04-MRN-580, PM 2.4/4.5, EA 151600	Darko, Emily
S-048525	2014	Historic Architectural Survey Report for the SMART Rail Corridor, San Rafael to Larkspur Project, Marin County, California	Bowen, Madeline
Within 1/2 mile of the CEQA study area			
S-001165	1978	Pipeline and Water Treatment Plant Facilities, Marin County	Desgrandchamp, Cindy and Mathew Clark
S-002076	1980	Final Report – Archaeological Evaluation of the Former Remillard Brick Kiln (CA-Mrn_255), Larkspur	Roop, William and Steven O'Brien
S-002301	1980	Archaeological Resources of point San Quentin	Archeo-Tec, Inc.
S-006424	1984	Archaeological Resources Evaluation for the Central Marin Sanitation Wastewater Transportation Facilities Improvement Project – Phase II, Marin County, California (EP Project No. C-06-2467-21)	Desgrandchamp, Cindy and David Chavez
S-009907	1988	Archaeological Survey of Landmark Plaza (former Victoria Station Restaurant), 17 E. Sir Francis Drake Blvd., Larkspur, California	Saltzman, Teresa Miller

Draft Environmental Impact Report

Report Number	Report Year	Report Title	Report Author(s)
S-010760	1989	Historic Properties Survey Report for Construction of High Occupancy Vehicle Lanes on Route 101 from Lucky Drive to San Pedro Road and Modifications of Routes 101/580 Interchange, in Cities of San Rafael and Larkspur, Marin County, 4-MRN-101, P.M. 8.4/12.7 04232-115750	Jones, Terry, Robert Gross, and Denise O'Connor
S-012242	1976	A Reconnaissance of the Wood Island Archaeological Site	Jackson, Thomas L.
S-012801	1991	Cultural Resources Technical Report, Municipal Water District Water Supply Project	Medin, Anmarie
S-012945	1957	The Examination of Indian Shell Mounds Within San Francisco Bay with Reference to the Possible 1579 Landfall of Sir Francis Drake	Treganza, Adan E.
S-013217	1990	An Archaeological Survey for the AT&T Fiber Optics Cable, San Francisco to Point Arena, California	Origer, Thomas M.
S-014868	1993	A Cultural Resources Evaluation of the Sir Francis Drake Boulevard Repaving and Drainage Improvement Project, Marin County, California	Roop, William
S-015337	1993	Archaeological Monitoring of Soil Boring at Remillard Brick Kiln/Restaurant	Bryne, Stephen
S-017570	1976	An archaeological reconnaissance of the proposed additions for the Ross Valley Sewage Treatment Plant on Sir Francis Drake Boulevard	Dietz, Stephen A.
S-023626	2000	Archaeological Investigations at CA-MRN-225/H, Larkspur, Marin County, California	Bieling, David G., Randall L. Dean, et al.
S-023745	2001	Archaeological Survey for Lucky Drive Levee Project, Marin County, California	Holson, John
S-025255	2000	Archaeological Field Inspection of the Proposed Development of Lot 41, San Quentin Point, Larkspur, Marin County, California	Holman, Miley Paul
S-026317	1985	An Evaluation of Archaeological Resources Within the Ross Valley Sanitary District Parcel, 2000 Larkspur Landing Circle, Larkspur, California	Roop, William
S-026330	2002	A Cultural Resources Evaluation of 135 East Sir Francis Drake Boulevard, Larkspur, Marin County, California (APN 018-171-05)	Pesnichak, Lisa
S-026993	1989	Final Report: Monitoring of Construction Activities For the Reuse of the Former Remillard Brick Kiln, Larkspur Landing, City of Larkspur, California	Roop, William

Draft Environmental Impact Report

Report Number	Report Year	Report Title	Report Author(s)
S-031737	2004	Archaeological Resources Technical Report for the Sonoma Marin Area Rail Transit (SMART) Project, Sonoma and Marin Counties, California	Denardo, Carole and Daniel Hart
S-033646	2007	Transportation Authority of Marin, Highway 101 Greenbrae Corridor, Cultural Resources Feasibility Study	Byrd, Brian F.
S-037429	2010	A Cultural Resources Evaluation of the Marin Sanitary Service Parcel, Jacoby Street, San Rafael, Marin County, California	Roop, William
S-037740	2010	San Quentin Area Bike and Pedestrian Access Cultural and Paleontological Resources Constraints Study, near San Quentin State Prison, Marin County, California (LSA #ALT0903)	Fuerstenberg, Theadora
S-038998	2011	Extended Phase 1, Geoarchaeological Explorations for the US 101/Route 580 Twin Cities Greenbrae Corridor Improvement Project, Larkspur and Corte Madera, Cal trans District 04, Marin County, California	Kaijankoski, Phillip and Jack Meyer
S-038999	2011	Archaeological Survey Report for the U.S. 101/Route 580 Twin Cities Greenbrae Corridor Improvement Project, Larkspur and Corte Madera, Marin County, California, 04-Mrn-101-PM 7.2/8.9, EA 1A660-O	Byrd, Brian
S-039344	2008	Limited Cultural Resources Evaluation for the Ross Valley Sanitation District Kentfield Forcemain Rehabilitation Project, Located in the City of Kentfield, Marin County, California	Pastron, Allen G.
S-043710	2013	Cultural Resources Study, Phase II Greenbrae Pipeline Replacement Project	Peabody, Joshua
S-044053	2013	Cultural Resources Constraints Report: HPR 2000 Redwood Hwy, Larkspur	Cox, Beatrice and Esme Hammerle
S-050060	2016	Phase I Cultural Resources Evaluation for the Pump Stations 12 and 13 Rehabilitation Project, located in Larkspur, Marin County, California	Archeo-Tec, Inc.
S-052655	2017	Final Initial Study/Mitigated Negative Declaration, Larkspur Landing Remediation Project, 2000 Larkspur Landing Circle, Larkspur, CA	Norby, Greg
S-054359	1973	Historical and Archaeological Survey of the Proposed Larkspur Ferry Terminal, Larkspur, California	Goerke, Elizabeth B.

Previously Recorded Resources

There are no previously recorded cultural resources within the CEQA study area.

Eight previously recorded cultural resources are within 0.5-mile of the CEQA study area. Five of these are archaeological resources, four of which are precontact Native American archaeological resources (Table 3.4-2). Two of these are in the vicinity of the CEQA study area. One of these, Wood Island, which was informally recorded and mapped, was noted as a heavily disturbed midden in 1976.

The second nearby precontact era site, P-21-000541/CA-MAR-255, was once a substantial shellmound that was leveled to accommodate the Green Brae Brickyard and Remillard Brick Kiln in the late 1800s.

There are two remaining built-environment resources within 0.5-mile of the CEQA study area: P-21-001157 (Superintendent's House for the Remillard Brick Kiln) and P-21-002831 (Greenbrae Boardwalk). These resources are not within the CEQA study area and will not be discussed further. The Northwestern Pacific Railroad has largely been replaced by the modern SMART transit system.

Table 3.4-2. Previously Recorded Cultural Resources in the 0.5-Mile Study Area

Primary Number	Name/Description	Resource Type	Comments
Informal Resource	Wood Island/habitation debris and lithic scatter	Precontact Archaeological Site	Not In CEQA study area
P-21-000108	Nelson No. 78/shell mound with habitation debris	Precontact	Not in CEQA study area
P-21-000458	None/shell mound with habitation debris and lithic scatter	Precontact	Not in CEQA study area
P-21-000541	None/shell mound with habitation debris	Precontact	Not in CEQA study area
P-21-001157	Superintendent's House (for Remillard Brick Kiln)	Historic (Building)	Not in CEQA study area
P-21-001158	Green Brae Brick Yard; Green Brae Brick Kiln	Historic (Building, Structure, Site)	Not in CEQA study area
P-21-002618	Northwestern Pacific Railroad	Historic (site)	Not in CEQA study area
P-21-002831	Greenbrae Boardwalk	Historic (Building, Structure)	Not in CEQA study area

Native American Consultation

The District initiated Native American outreach and consultation February 18, 2021, requesting a Sacred Lands File (SLF) search and contact list of California Native American tribes that are traditionally and culturally affiliated with Marin County from the NAHC. As the CEQA lead agency, the District has responsibilities under AB 52 to consult with California Native American tribes that are affiliated with the geographic area of any proposed project.

The NAHC responded on March 2, 2021, stating that the SLF search was negative and providing a list of the two Marin County tribes requesting consultation, the FIGR and Guidiville Indian Rancheria. On April 16, 2021, the District sent a letter to the identified tribes describing the Project and informing the tribes that

that the NAHC search of the SLF was negative, that the record search conducted by the NWIC did not identify any previously recorded archaeological resources within the CEQA study area, and inviting them to consult on the Project. A record of Native American outreach communications is presented in Appendix A of the *Cultural Resources Report for The Larkspur Ferry Service and Parking Expansion Project: Golden Gate Bridge, Highway and Transportation District* (Appendix D).

The Tribal Historic Preservation Office (THPO) for the FIGR, Buffy McQuillen, replied by email on June 9, 2021. The email response from McQuillen indicated "The Tribe has reviewed the project notification dated April 16, 2021 and would like to let you know that there may be Tribal Cultural Resources in the project area. Please let us know if you have any questions."

The District met with FIGR representatives on August 23, 2021. The FIGR shared their concerns about the potential presence of tribal cultural resources in the project area of the LFT.

In a letter dated July 18, 2023, sent by email and certified mail, the District provided a project status update and invited the FIGR to monitor preliminary geotechnical investigations to be undertaken the week of August 14, 2023. The investigation used direct push coring and core penetration tests to determine the underlying geotechnical site conditions for building foundation design. The District received no response from FIGR.

The District sent a letter by email and certified mail to THPO McQuillen of FIGR September 19, 2024, inviting FIGR to attend the upcoming Open House and Scoping Meeting to be held October 15, 2024, to formally initiate the environmental process for the project and invite the public to provide feedback on the DEIR.

The District sent a letter by email and certified mail to FIGR THPO McQuillen June 10, 2026, notifying her of upcoming soil coring investigations to test archaeological sensitivity of subsurface deposits, and inviting FIGR to provide a monitor for the investigation. FIGR THPO McQuillen, Cultural Resources Specialist Hector Garcia Cabrales, and Kyle Rabellino, Archaeologist with the tribe, visited the investigation on Friday, June 26, observed the coring, and discussed observations with Jacobs geoarchaeologist Kyle Brudvik.

Larkspur Ferry Terminal Improvements Project Archaeology and Built-Environment Survey

Jacobs archaeological staff conducted a pedestrian survey of the study area and nearby areas on June 4, 2021. The CEQA study area is within and surrounded on three sides by areas that have been developed for use by the ferry terminal or other commercial/transportation use. The majority of the CEQA study area consists of the 10.41 acres of surface-level parking in the Main Lot and the approximately 1.64-acre surface-level parking in the North Lot. These areas are paved, with some planter areas along the perimeter of the Main Lot and some landscaped trees arranged at the Sir Frances Drake Boulevard entry/exit. Jacobs staff established that the CEQA study area contains no exposed native soil, making the survey unproductive for archaeological resources. However, adjacent margins of the bay and the reported location of Wood Island on the north west of the CEQA study area were inspected. Visibility was poor because of thick vegetation dominated by poison oak, and the hillside has suffered erosion, possibly displacing and obscuring the site. No evidence of the reported flaked stone or midden was observed.

Jacobs conducted a survey of built-environment resources to develop a comprehensive historical resource inventory of all built properties within the CEQA study area. One historic-aged (more than 45 years in age) property had never previously been recorded in a built-environment survey or otherwise evaluated for listing in the NRHP or CRHR: the LFT.

Jacobs surveyed the previously unrecorded LFT built-environment resources in the Project area and documented the CRHR evaluation on a California Department of Parks and Recreation 523A (Primary Record) and 523B (Building, Structure, Object Record) form set.

3.4.2.2 Archaeological Resources in the Project Area Limits

No archaeological resources have been observed or recorded within the CEQA study area. The age and depositional nature of sediments underlying the CEQA study area are such that the CEQA study area has the potential for unknown buried cultural resources within the Bay Mud, which occurs between the artificial fill, and the Franciscan Complex bedrock, which is reached at variable depths across the CEQA study area; it is generally within 15 to 20 feet of the ground surface in the North Lot and within approximately 45 to 60 feet of the ground surface in the Main Lot.

3.4.2.3 Built-Environment Resources in the Project Area Limits

The following section presents details regarding the built-environment resources in the CEQA study area that qualify as historical resources under CEQA. As described in the introduction to this section, a property is considered a historical resource under CEQA if it is listed in or formally determined eligible for listing in the CRHR; is included in an adopted local register; is identified as significant in a qualifying historical resource survey; or is otherwise determined by the CEQA lead agency to be historically significant. This overview of built-environment resources first describes the historical resource identification efforts that occurred before the preparation of this DEIR and then presents information on surveys that Jacobs conducted to support the assessment of potential impacts in the DEIR.

Based on previous historical resource evaluations and updated evaluations prepared for this DEIR, the CEQA study contains one built-environment resource that qualifies as a historical resource for the purposes of CEQA: The LFT at 101 E. Sir Francis Drake Boulevard. No additional built-environment resources are in the CEQA study area.

Resource Description

The LFT is a public transportation facility in the City of Larkspur, Marin County, adjacent to Sir Francis Drake Boulevard near the mouth of Corte Madera Creek and the San Rafael Bay. The terminal occupies approximately 14.5 acres and includes ferry-related buildings, structures, docking facilities, circulation areas, and parking facilities that support ferry operations and passenger access. An approximately 83-acre ferry basin extends north-south along the eastern side of the property and accommodates passenger ferry vessels.

The surrounding area is highly urbanized and characterized by commercial development, transportation infrastructure, and residential neighborhoods. Most of the property consists of paved parking areas, while operational facilities are concentrated in the southeastern and southwestern portions of the site.

The primary architectural feature of the terminal is the Shelter Structure, a distinctive open-air passenger facility completed in 1976. The structure has been identified as a notable example of High-Tech Structuralism, also referred to as Structural Expressionism, a Late Modern architectural style characterized by exposed structural systems, geometric forms, and visible engineering elements. The shelter consists of a triangular steel space-frame canopy supported by reinforced concrete pyramidal bases and covered by translucent tensile roof panels. The design emphasizes triangular geometry, exposed structural components, and sculptural form.

Immediately south of the shelter is the Service Building, a two-story triangular-plan structure that incorporates reinforced concrete, structural steel, and ribbon glazing. The design reflects the geometric vocabulary established by the Shelter Structure, although at a more utilitarian scale.

Associated resources include ferry loading platforms, passenger circulation features, dock facilities, ferry berths, maintenance and fueling facilities, utility structures, and parking areas. Together, these features function as an integrated transportation facility and contribute to the historic character of the terminal.

Evaluation of Significance

The LFT was evaluated for eligibility for listing in the CRHR and the NRHP. Although the terminal has been recognized within professional architectural circles, including identification by Docomomo as an important example of 1970s modern architecture, no formal CRHR or NRHP determination has previously been completed.

CRHR Criterion 1 (Events)

The LFT is associated with the late twentieth-century expansion of regional ferry transportation in the San Francisco Bay Area and efforts to provide alternatives to growing automobile congestion on U.S. Highway 101 and the Golden Gate Bridge corridor. The terminal reflects broader regional transportation planning initiatives that expanded multimodal transit services within Marin County and the greater Bay Area.

Although associated with these important transportation trends, the terminal does not appear to have played a singular or pivotal role in initiating ferry service restoration or regional transit planning. Rather, it functioned as one component of a larger transportation program. Accordingly, the property does not appear eligible under CRHR Criterion 1.

CRHR Criterion 2 (Persons)

Research conducted for this evaluation did not identify any direct association between the LFT and individuals significant in local, state, or national history. Therefore, the terminal does not appear eligible under CRHR Criterion 2.

CRHR Criterion 3 (Design/Construction)

The LFT embodies the distinctive characteristics of Late Modernism, specifically the High-Tech Structuralist architectural style. Constructed in 1976, the facility displays hallmark features of the style, including the following:

- Exposed structural systems
- Monumental geometric forms
- Extensive use of steel and concrete
- Expression of engineering and construction technologies as architectural features
- Space-frame construction
- Sculptural treatment of structural elements

The Shelter Structure serves as the property's defining architectural feature and represents a rare application of High-Tech Structuralism to transportation infrastructure within the San Francisco Bay Area. The facility has received professional architectural recognition, including publication in *Architectural Record* and recognition by the American Institute of Architects. Additionally, local mid-century architecture advocacy group Docomomo has identified the terminal as a significant example of 1970s modern architecture.

Based on the applicable historic context and evaluation criteria, the LFT appears eligible for listing in the CRHR under Criterion 3 as a significant and well-preserved example of High-Tech Structuralist architecture associated with the Late Modern period.

CRHR Criterion 4 (Information Potential)

The LFT does not appear likely to yield important information regarding history or prehistory beyond that already available through existing documentation, archival sources, and architectural records. Consequently, the property does not appear eligible under CRHR Criterion 4.

Period of Significance and Character-Defining Features

The period of significance for the LFT is 1976, the year in which the facility was completed and placed into operation. This date falls within the recognized period of significance for Late Modern architecture.

Character-defining features that convey the property's significance include the following:

- Triangular steel space-frame canopy and tensile roof system
- Reinforced concrete pyramidal support structures
- Strong geometric and sculptural design forms
- Exposed structural and engineering elements
- Use of concrete, steel, and modern construction materials
- Triangular-plan Shelter Structure and Service Building
- Open passenger circulation areas and ferry loading facilities
- Overall visual expression of High-Tech Structuralist design principles

Integrity Assessment

The LFT has undergone several modifications since its construction, including parking lot reconfiguration, expansion of ferry berthing facilities, landscape alterations, replacement of site lighting, and operational improvements associated with continued ferry service. These changes are generally limited in scope and do not substantially alter the architectural features that convey the property's significance.

The terminal retains integrity of location, remaining in its original waterfront setting at the mouth of Corte Madera Creek.

The property retains a high degree of integrity of design. The principal architectural elements, including the triangular space-frame canopy, structural system, and overall geometric composition, remain intact.

Although surrounding development has increased over time, the terminal continues to function as a ferry facility within a waterfront setting and maintains its visual relationship to San Francisco Bay.

The terminal retains integrity of materials. Character-defining steel and concrete components remain largely intact and continue to convey the property's architectural significance.

The exposed structural system and construction methods remain readily apparent and continue to illustrate the design and engineering practices associated with the period of significance.

The terminal continues to convey the architectural character of a Late Modern transportation facility through its monumental form, exposed structure, and distinctive engineering expression.

The property retains integrity of association because it continues to operate as a ferry terminal and remains associated with regional transportation services.

Conclusion

Based on the foregoing analysis, the LFT retains sufficient integrity to convey its architectural significance and appears eligible for listing in the CRHR under CRHR Criterion 3 as a rare and important example of High-Tech Structuralist architecture within the broader context of Late Modern transportation infrastructure.

3.4.2.4 Thresholds of Significance

The following State CEQA Guidelines Appendix G thresholds identify significance criteria to be considered for determining whether a project could have significant impacts related to cultural resources.

Would the proposed Project do the following:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
- Disturb any human remains, including those interred outside of dedicated cemeteries?

Section 15064.5(b)(1) of the State CEQA Guidelines defines “substantial adverse change to a historical resource” as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired.” Material impairment of a historical resource, as defined in State CEQA Guidelines Section 15064.5(b)(2), occurs when a project “demolishes or materially alters in an adverse manner” those physical characteristics of the resource that express its significance and justify its inclusion in, or eligibility for listing in, the CRHR or a qualified local register of historical resources or evaluation as historically significant in a qualified local survey.

3.4.2.5 Impacts

Cause a Substantial Adverse Change in the Significance of a Historical Resource Pursuant to Section 15064.5

Construction

Build Alternatives

The Build Alternatives would impact the LFT, recommended as a historical resource, through the construction of the proposed parking garage that will be within the current Main Lot parking area of the property. A formal evaluation of the LFT property assessed the significance of the property as a historical resource for the purposes of CEQA (Appendix D). The report sought to assess the legitimacy of statements made by previous advocates of mid-century modern architecture within the greater Bay Area who noted the LFT as a unique architectural design for a municipal transportation-related facility (Docomomo 2021; Simonson 2024). These earlier sources claimed the 1970s transportation property derives some notability from its having contributed to the catalog of mid-century modern architecture within the greater Bay Area.

The 1976 transportation property traces its roots back to the Osaka Japan Expo’70 Space Frame for the Festival Plaza (Kawaguchi & Engineers 2026). The use of similar engineering/architecture motifs, design, and materials (on a smaller scale) for the ferry terminal is clear. Despite some alterations that include

removal of an awning for the original bus parking area that was part of the original construction and changes to the lighting and landscaping of the property, the LFT Shelter Structure remains easily recognizable as a notable example of what some have identified as “High-Tech Structuralism” or “Structural Expressionism” with its space frame, tensile roof, cable structure, and futuristic-looking technology (geometric shape thematic, exposed frame, etc.) construction for which the style became popular. The 1970s style has also been compared to that of the Buckminster Fuller geodesic dome popularized in the U.S. following World War II.

The proposed Project would represent a change to the Main Lot parking lot and road prism areas that are adjacent to the Shelter Structure and Service Building, which are in the southeast corner of the property. While the historical resource boundary includes the Main Lot parking area that was part of the original 1974 design, the key character-defining features of the property are focused on the two terminal structures with their mid-century aesthetic and prominence as vertical focal points of the facility from most viewpoints around the facility. The Main Lot parking area, while constructed as part of the 1974 plan, followed the geometric aesthetic of the architects in its layout, but that connection is only appreciated when viewed from above. This effectively raises the Shelter Structure and the Service Building to exist as the primary character-defining features of the terminal. The proposed Project will not physically change either of these structures and will be set back from the edge of the circular roadway around the perimeter of the current roadway.

The addition of the parking garage to the Main Lot parking area will not block primary views from the terminal to the bay or obscure views of the terminal’s mid-century architectural features. The proposed Project will not permanently change the overall character of physical features within the property’s boundary that contributes to its historic significance or change its use as a public ferry terminal. The general bayside setting of the municipal historic property will remain, and the contributing buildings (the Shelter Structure and Service Building) will still be highly visible and continue to operate as components of a ferry terminal in the City of Larkspur, Marin County.

Regarding the resource’s historic setting (the terminal facility retains a moderate degree of integrity of setting), although surrounding infrastructure, parking areas, and adjacent development have changed over time, the terminal continues to serve as a waterfront ferry facility with a strong visual relationship to San Francisco Bay. Regarding historic feeling (the resource retains a high degree of integrity of feeling), the resource would retain its feeling as a Late Modernist transportation facility. Its monumental form, exposed structure, and open terminal space will continue to convey the architectural character of 1970s infrastructure design. For historic association (the buildings retain a high degree of integrity of association), the terminal continues to function as a ferry facility and remains directly associated with the transportation network.

The proposed Project would introduce new visual elements within the western portion of the Main Lot portion of the resource (and will be contained entirely within the existing parking area of the Main Lot) as well as alter the views of the LFT from along Sir Frances Drake Boulevard as the Shelter Structure (and to a lesser extent the Service Building) would be joined by the added adjacent parking garage. These added parking garage elements would alter the setting as the western portion of the former parking area would be replaced with the parking garage. Integrity of feeling and association for the Shelter Structure and the Service Building would primarily remain as they are currently because there would continue to be a strong visual connection with the design that provided an artful municipal transportation facility in the Larkspur area.

Although the proposed multistory parking garage will be in proximity to the historic structures that comprise the LFT, these new parking elements would be set back from the terminal structures such that they would not present an overwhelming change in their visual relationship though integrity of setting will

be reduced. The parking garage includes one design feature, a hexagon footprint, that evokes some of the architectural style defined as “High-Tech Structuralism” or “Structural Expressionism” (Simonson 2024). Where appropriate, at their closest, the new elements (bike parking area) will sit more than approximately 100 feet from the key structures and will avoid physical modification to any of the building characteristics that currently exist. The added parking garage is within western viewshed (facing parking area) from the ferry terminal Shelter Structure but will be outside existing views of the Bay to the south and east.

Under the proposed Project, the physical aspects of integrity that include the location, design, materials, and workmanship of the LFT would remain much as they did in 1976. The property’s feeling and association with the ferry terminal’s municipal transportation role and the role the terminal construction played in the growth of the City of Larkspur will not change because of any changes brought about under the proposed Project. While the resource’s setting might be altered somewhat by the introduction of new visual elements of the Project, the new additions will likely be differentiated from the older material, and most changes will be comparable in size and scale to that which already exists. The parking area has received a majority of changes to the facility since construction.

In summary, because the introduction of these new physical and visual elements would not diminish all the seven aspects of integrity of the terminal (Shelter Structure) and the Service Building (most notably the historic integrity aspects location, design, materials, workmanship, feeling, and association) to a level where the resource fails to convey its significance (even with the slightly altered integrity of setting), the proposed Project would have a less-than-significant impact on the LFT.

As a result, construction of either of the Build Alternatives would have a ***less-than-significant impact*** on built-environment historical resources. No mitigation required.

Operation

Build Alternatives

Under the Build Alternatives, operations of the improved ferry terminal facility would occur within the LFT. Operations would not involve physical changes to any historical resources but would introduce new visual, audible, and atmospheric elements in the vicinity of those resources. Hypothetically speaking, circumstances could exist in which visual, audible, and atmospheric elements lead to the diminishment of a historical resource’s integrity. For instance, it is possible that long-term, intermittent increases in noise and vibration resulting from the operations of a transportation facility might compel individuals to abandon a historical resource such as a residence or commercial building that were not previously subjected to noise or vibration at levels that will likely remain following the improvements. Such an act would constitute an indirect impact if it were to result in neglect of a resource’s physical features that convey significance, which over time could diminish integrity of design, materials, workmanship, feeling, and association.

As described in Chapter 3.11, Noise, increases in operations-caused noise and vibration would not be substantive, and the intensity of transportation activities would not be substantially different from current conditions. As such, it is not anticipated that abandonment and neglect of historical resources would reasonably occur as an effect of Project operation. Furthermore, no historical resources identified for the current investigation appear to rely upon a quiet setting to convey their significance. The negligible degree of change in the audible and atmospheric conditions of historical resources in the City of Larkspur is not anticipated to diminish the historical integrity of any identified built-environment historical resource and would not constitute material impairment of its significance.

Therefore, operations of either of the Build Alternatives would have ***no impact*** on built-environment historical resources.

Mitigation Measures

No mitigation required.

Cause a Substantial Adverse Change in the Significance of an Archaeological Resource Pursuant to Section 15064.5

Construction

Build Alternatives

No known archaeological resources are in the CEQA study area.

Construction of the Build Alternatives would involve ground-disturbing activities that may extend below existing artificial fill, including the mass removal of fill, installation of piles to support the new parking garage in the Main Lot, trench excavation for tie-ins to existing storm drain and utility infrastructure, and the excavation of an elevator shaft in proposed parking garages in both the Main Lot and the North Lot. The planned depth of disturbance of these activities would extend beneath the artificial fill into underlying Bay Mud at the Main Lot, and therefore construction of Build Alternatives has the potential to disturb previously undiscovered and unrecorded archaeological resources. Should this occur, the ability of the deposits to convey their significance, either as containing information about prehistory or history, or as possessing traditional or cultural significance to Native American descendant communities, would be materially impaired and impacts would be **significant**.

While no archaeological sites were previously recorded or observed in the CEQA study area, construction of the Build Alternatives could impact previously unidentified archaeological sites. This impact would be **significant**. However, implementation of MM-CULT-CNST-1 and MM-CULT-CNST-2 would ensure that impacts related to archaeological resources would be ***less than significant with mitigation***.

Operation

Build Alternatives

Operation of the LFT would not include ground disturbance and therefore would result in ***no impact*** on any archaeological resources.

Mitigation Measures

MM-CULT-CNST-1: Conduct Cultural Resource and Tribal Cultural Resource Awareness Training Prior to Project-Related Ground Disturbance and Stop Work if Archaeological Deposits are Encountered During Ground-Disturbing Activities

Before any Project-related ground disturbance, the District shall ensure that all construction workers receive cultural resources training before the beginning of ground-disturbing activities on the site. The training will be overseen by a qualified professional archaeologist who is experienced in teaching non-specialists to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction. Tribal cultural resource awareness will be provided by a qualified Tribal Monitor, approved by the FIGR, at the same time. The training will be prepared by the District and will

include, at a minimum, the laws governing the protection of such resources, a description of the kinds of resources that may be encountered, the role of the archaeological and tribal monitors, and the protocol to follow if such resources are identified during construction.

MM-CULT-CNST-2: Develop and Implement a Tribal Cultural and Archaeological Monitoring and Discovery Plan

Given the reasonable potential for tribal cultural and archaeological resources to be present within the proposed work area, the following measures shall be undertaken to avoid any significant impacts on these potential resources. A Tribal Cultural and Archaeological Monitoring Plan (plan) shall be developed by a qualified archaeologist in consultation with local tribes before any project-related ground disturbance. The plan shall determine specific areas of archaeological sensitivity within proposed work areas and shall determine the conditions, such as depth of disturbance and kind of activity, for which an onsite Native American and qualified archaeological monitor are required during project-related ground disturbance. The plan shall include protocol that outlines tribal cultural and archaeological monitoring best practices, anticipated resource types, and an Unanticipated Discovery Protocol. The Unanticipated Discovery Protocol shall describe steps to follow if archaeological discoveries are made during project work and shall provide a chain of contact. All work will be done in accordance with San Rafael General Plan 2040 (City of San Rafael 2020), Policy CFP-5.13: Protection of Archaeological Resources.

Disturb any Human Remains, Including those Interred Outside of Formal Cemeteries

Construction

Build Alternatives

While no Native American human remains were previously recorded or observed in the CEQA study area, construction of the Build Alternatives could impact previously unidentified human remains. Native American human remains are often associated with Native American archaeological sites, and thus, it is possible that remains could be encountered if an archaeological deposit is discovered during construction. They may also be present as isolated or redeposited remains. All Native American human remains and associated burial artifacts are considered sensitive. This impact would be **significant**. However, implementation of MM-CULT-CNST-1, MM-CULT-CNST-2, and MM-CULT-CNST-3 would ensure that impacts related to human remains would be ***less than significant with mitigation***.

Operation

Build Alternatives

Operation of the LFT would not include ground disturbance and therefore would result in ***no impact*** on any human remains.

Mitigation Measures

Under any Build Alternative that is selected and constructed, the following measure, in addition to protocols laid out in MM-CULT-CNST-1 and MM-CULT-CNST-2 will be followed.

MM-CULT-CNST-3: Comply with State Laws Relating to Human Remains

Any human remains and related items discovered during the implementation of this project shall be treated in accordance with the requirements of Section 7050.5(b) of the California Health and Safety Code. If, pursuant to Section 7050.5(c) of the California Health and Safety Code, the county coroner/medical examiner determines that the human remains are or may be of Native American origin, then the discovery shall be treated in accordance with the provisions of Section 5097.98(a)-(d) of the PRC. The District shall ensure that the remains are not damaged or disturbed further until all stipulations in Section 7050.5 and Section 5097.98 have been met. All work will be done in accordance with San Rafael General Plan 2040 (City of San Rafael 2020), Policy CDP-5.13: Protection of Archaeological Resources.

The Tribal Cultural and Archaeological Monitoring and Discovery Plan, MM-CULT-CNST-2, will include the following language:

If any human remains are discovered during ground-disturbing activities, an evaluation shall be performed to assess likely age and provenance in a manner that is respectful of the disturbed remains. If determined to be, or likely to be, Native American, the District shall comply with state laws regarding the disposition of Native American burials, which fall within the jurisdiction of NAHC (PRC Section 5097). If human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the following occurs:

1. The county coroner has been informed by the District and has determined whether investigation of the cause of death is required
2. If the remains are of Native American origin:
 - a. The descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.
 - b. NAHC was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission.
 - c. NAHC recommends a Most Likely Descendant to make a recommendation to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). Section 7050.5 requires that excavation be stopped in the vicinity of the discovered human remains until the coroner can determine whether the remains are those of a Native American.