

4. Cumulative Impacts

An Environmental Impact Report (EIR) is required to examine cumulative impacts. California Code of Regulations Section 15130(a)(1) defines a cumulative impact as consisting “of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” The analysis of cumulative impacts need not provide the same level of detail as that for project-specific impacts, but it shall “reflect the severity of the impacts and their likelihood of occurrence” (per California Code of Regulations Section 15130[b]). The California Environmental Quality Act (CEQA) Guidelines Section 15065 states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects that are individually limited but cumulatively considerable. As defined in State CEQA Guidelines Section 15065(a)(3), *cumulatively considerable* means “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” The cumulative impacts analysis in an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document.

4.1.1 Approach and Methodology

State CEQA Guidelines Section 15130(b) states that the discussion of cumulative impacts should include the following:

- Either (1) a list of past, present, and probable future projects producing related or cumulative impacts or (2) a summary of projections contained in an adopted general plan or similar document, or in an adopted or certified environmental document, that described or evaluated conditions contributing to a cumulative impact
- Discussion of the geographic scope of the area affected by the cumulative impact
- Summary of expected environmental effects to be produced by these projects
- Reasonable, feasible options for mitigating or avoiding the project’s contribution to any
- Significant cumulative effects

According to CEQA Guidelines Section 15130 (a)(1), an EIR should not discuss impacts that do not result in part from the project evaluated in the EIR. For a project to contribute to cumulative impacts, it must result in some level of impact on a project-specific level. As described in Section 1.3.2.41, Environmental Resources Not Considered in this Draft Environmental Impact Report, the Larkspur Ferry Service Expansion and Parking Project (Project) would have no impact on mineral resources or agricultural and forestry resources. Because the proposed Project would have no impact on these resources, it cannot contribute to any potential cumulative impacts, and these resource areas are not discussed further in the cumulative impact analysis. Additionally, based on analysis in this Draft EIR, it was also determined that the Project would not result in any impacts on population and housing. Consequently, the Project would not have the potential to contribute to cumulatively considerable adverse impacts related to this resource, and it is not discussed in this cumulative impact analysis.

4.1.2 Projects Considered

Reasonably foreseeable future projects are defined as the projects that have been adopted or have otherwise demonstrated likelihood to occur based on documentation from project sponsors.

Table 4-1 presents the projects considered and includes their applicable jurisdictions, potential impact areas, estimated construction schedules, and distance from the proposed Project. Project information listed in Table 4-1 is based on information supplied by the Golden Gate Bridge, Highway and Transportation District (District), City of Larkspur, Marin County, and other sources.

Table 4-1. Projects Considered in the Cumulative Impacts Analysis

Project	Description	Distance from Site
Ferry Projects		
Purchase new ferry (Project 1940) Ongoing	This project includes the purchase new, 500-passenger, high-speed ferry vessel to improve existing service and better serve routes between Marin County and San Francisco.	Onsite
Spaulding Scheduled Replacement (Project 2446) Ongoing since 2020	The project involves the phased replacement of aging Spaulding-class vessels with newer, more fuel-efficient vessels (aligned with Liwa-class design principles).	Onsite
Spaulding Class Dry Docking (Project 2644) Fiscal Years 2026 to 2034	This project includes designing and constructing a fleet of CARB-compliant vessels to replace the three 750-passenger capacity Spaulding-class vessels.	Onsite
Del Norte Catamaran Replacement (Project 2445) Ongoing since 2025	This project replaces the Del Norte ferry to address CARB-proposed Commercial Harbor Craft regulations that developed an Alternative Control of Emissions Plan. The Del Norte is the first of the existing catamaran fleet to be replaced. The project aligns the fleet upgrade schedule to support the District's Climate Emergency Action Plan to reduce GHG emissions from revenue vehicles.	Onsite
Ferry Vessel Rehab (Project 2341) Fiscal Year 2023	This project involves the scheduled rehabilitation and capital improvement of ferry vessels beginning in Fiscal Year 2023. Projects are associated with the propulsion system, hull inspection, and navigational equipment required to reach the full economic life of a ferry vessel and ensure compliance with USCG regulations. This project is intended to fund dry dockings for the District's catamaran high-speed vessels for the remainder of their service life.	Onsite
Spaulding Drydocking and Capital Improvements (Project 2447) Fiscal Year 2024	This project involves the scheduled rehabilitation and capital improvement of Spaulding-class ferry vessels. Projects are associated with propulsion and auxiliary and control systems, hull inspection, and navigational equipment required to reach the full economic life of a ferry vessel and ensure compliance with USCG regulations until they are retired. This project is intended to fund drydocking for the Ferries MS Marin, MS San Francisco, and MS Sonoma.	Onsite
Camels and Floats Restoration (Project 2645)	This project rehabilitates the floating mooring equipment at the LFT. Project includes renewing buoyancy to the floating	Onsite

Project	Description	Distance from Site
	camels, addressing corrosion and structural repairs to the steel structures, renewing marine coatings, and maintaining and improving the vessel servicing equipment to improve safety, efficiency, and reliability of vessel servicing.	
Ferry Fleet and Infrastructure Electrification Concept (Project 2342) Ongoing	This project provides feasibility studies and design concept development for future ferry electrification, which is necessary for shore-side charging infrastructure. This project is necessary to support a larger scale study and concept, including charging infrastructure and electrification of District ferry vessels.	Onsite
Landside Projects		
Drainage Culvert Rehabilitation (Project 2641)	This project provides slip lining of the existing deteriorated storm drain culvert to restore the integrity of the storm drain and underlying earth berm at LFT diesel fuel tank farm. The work includes pulling a smaller HDPE pipe through the full interior length of the existing storm drain, grout filling the annular space between the HDPE and existing corrugated pipe, and constructing new concrete headwalls at both ends of the drain pipe.	Onsite
Fixed Containment Boom Replacement (Project 2544)	This project replaces the fixed oil spill containment boom at LFT because of the state of poor repair and its reaching the end of its useful life. The containment boom requires complete replacement to help mitigate any potential oil spill from the ferry terminal ramp and gangway hydraulics, vessel fueling, or oily bilgewater systems that are used to service the vessels. This project will replace the closing project LFT Fixed Boom Service Life Extension Project.	Onsite
LFT Parking Expansion Study (Project 2042) Ongoing since 2020	The project includes the study of mid- and long-term growth scenarios for LFT service, including environmental clearance for increased crossings and parking expansion options. LFT service has reached capacity during peak periods, constrained by both the limited number of crossings allowed per current environmental clearance and parking demand, which has exceeded availability.	Onsite
Gangways and Piers (Project 0503)	This project provides preliminary engineering and environmental work to replace and rehabilitate the existing hydraulic gangway and ramp system installed at the San Francisco, Larkspur, and Sausalito ferry terminals that were built in the mid-1970s.	Onsite and at Sausalito (7.7 miles)
LFT Berth Rehabilitation	This project rehabilitates the passenger access system at Berths 1 and 2 because of deterioration requiring emergency	Onsite

Project	Description	Distance from Site
(Project 2541) 2026 to 2027	attention instead of the floating mooring equipment and passenger gangways of both LFT and San Francisco Ferry Terminal. An increase to the project budget is required because the contract estimate and staff labor needed for the LFT berth portion is higher than originally estimated.	
LFT Berth 1 Berthing Arrangement Feasibility (Project 2442)	This project provides the feasibility study and development of a conceptual plan view for a Larkspur Berth 1 float installation to facilitate main deck loading. The plan may include the removal of the existing hydraulic ramp and camel float infrastructure	Onsite
LFT Berth and Channel Dredging (Project 2642) Ongoing since 2020	This project includes the design and permitting associated with dredging the LFT berths, turning basin, and approach channel. These areas require periodic dredging to remove sediment that accumulates over time and which, if not removed, will impact ferry operations.	Onsite
Ramp Infrastructure Capital Improvements (Project 2545)	This project implements necessary ramp infrastructure improvements at Angel Island, Tiburon, Larkspur, and Sausalito to ensure continued service reliability and enhance the safety of mooring operations.	Onsite
LFT Kiosk A Rehabilitation (Project 2542) 2025 to 2028	This project includes the design and rehabilitation to the LFT Kiosk A, located inside the paid waiting area of the LFT. Work includes rehabilitating the roofs, water damaged areas inside the kiosks, improving ventilation, painting, and other necessary work to repair damaged and deteriorated conditions.	Onsite
LFT Kiosk C Rehabilitation Project (Project 2543)	This project will rehabilitate Kiosk C because of the antiquated dating from original construction in 1976, which no longer meets the current and future needs of the Ferry Division. Kiosk C, originally designed for physical ticket vending and collecting by District staff, requires significant updates to make a functional office space for terminal supervisors. Updates include updating of restrooms, carpet (currently torn out), paint, and updated furnishings.	Onsite
LFT Service Building Roof Rehabilitation (Project 2546) Fiscal Year 2025 to 2026	This project will rehabilitate the LFT service building roof and install a fall restraint system around the roof perimeter.	Onsite
Larkspur DEF Storage and Transfer Infrastructure Design (Project 2540)	This project includes investigation and design for the installation of a new fuel tank and piping system at the LFT. The new fuel tank will be for storage of diesel exhaust fluid	Onsite

Project	Description	Distance from Site
	(aqueous urea solution), a necessary additive required for diesel powered vehicles, including the District's new ferry vessels.	
LFT ADA Parking Lot (Project 2646) Fiscal Year 2025 to 2026	This project provides ADA parking lot rehabilitation improvements: grinding existing asphalt concrete surfacing, placing new asphalt concrete overlay, improving the embankment slope, replacing ADA signage, and adding new striping and wheel stops.	Onsite
US 101/I-580 Multimodal and Local Access Improvement Project Fiscal Year 2032	Address congestion and enhance connectivity between northbound US 101 and eastbound I-580 to the Richmond-San Rafael Bridge. Received voter support for funding in the local <u>Marin 1/2-Cent Transportation Sales Tax, Measure AA</u> , renewed in 2018. The project is also included in <u>Regional Measure 3 (toll-bridge funds)</u> , which was approved by voters in June 2018. It is anticipated that additional funding will be needed to fully fund the construction of the project.	Approximately 2 miles
Oak Hill Workforce Housing project Marin County Public Financing Authority Fiscal Year 2028	This project includes future development on 8.5 acres of unused state property in the unincorporated area of San Quentin to provide 135 units for educators and County of Marin employees who qualify based on income. This project is public/private partnership with Educational Housing Partners, College of Marin, Marin Office of Educations, San Rafael City Schools, Novato Unified and the County. Educational Housing Partners is designated to manage construction once the project is fully permitted.	1 mile by road, 1/2 mile direct
2000 Larkspur Landing Circle Development Ross Valley Sanitary District	It is a future development project on 10.7 acres of land at 2000 Larkspur Landing Circle in Larkspur where a wastewater treatment plant was previously located. The project may include high-density residential use, limited commercial or office use to serve local and regional needs, or public facilities. Residential units are multiple dwelling units up to 35 units per acre. Request for Qualifications was issued on August 4, 2025. Project team will work with Brookfield Residential/Carmel Partners.	.7 mile
Larkspur Library and Comm Center City of Larkspur and TCF	The project for City of Larkspur and TCF is to build a \$5 million library building at the Rose Lane Community Facility on 2-acre parcel of land. It is anticipated that the building will serve as the first phase in a multi-phased approach to building a larger library and community center. The site is on Doherty Drive at Rose Lane.	3 miles by road, 1 mile direct

Project	Description	Distance from Site
Larkspur Library and Comm Center City of Larkspur and TCF	The project for City of Larkspur and TCF is build a \$5 million library building at the Rose Lane Community Facility on 2-acre parcel of land. It is anticipated that the building will serve as the first phase in a multi-phased approach to building a larger library and community center. The site is on Doherty Drive at Rose Lane.	3 miles by road, 1 mile direct
City Hall Renovation Study Page and Turnbull Fiscal Year 2026	Opportunity to explore renovation options and reassess how the vacated space in City Hall can best serve the Larkspur community when the Larkspur Library moves to Rose Lane from its current location. The Historic Structure Report will examine the history and condition of City Hall and explore renovation options, as well as prioritized repair and maintenance recommendations and cost estimates associated with renovation schemes.	3 miles by road, approximately 1.5 miles direct
250 Bon Air Drive, Greenbrae Behavioral Health Building Count of Marin Health Fiscal Year 2026	This improvement project is for common areas and building systems: the Behavioral Health Building ("BHB") contains approximately 40,000 square feet in two stories and was constructed in 1967. Therefore, the first task is to evaluate the standby power needs of the facility. County and Marin Health will continue to meet in Fiscal Years 2025 and 2026 to plan the next set of projects based on importance to each party using the Facility Condition Assessment, and they will return to the Board with recommendations.	2 miles
Traffic Improvements Fiscal Year 2026 \$3.2 million	This includes traffic improvement projects consisting primarily of grant-funded projects, with the most consistent (but not only) grant source being the HSIP. Grants awarded under the HSIP program fund safety improvements such as guardrail installation and replacement, enhanced signage and striping, roadway and intersection lighting, horizontal and vertical roadway geometry improvement projects and technological upgrades to traffic signals that often extend across jurisdictional boundaries, and pedestrian improvements beyond paving project requirements.	Scattered
Sir Francis Drake Boulevard Corridor Operations and Innovation Plan Request for Proposal #2906 Fiscal Year 2027	The County of Marin seeks a consultant to evaluate corridor operations through targeted data collection and analysis; identify innovative and practical solutions to improve travel time reliability, transit performance, safety, and multimodal mobility; and prioritize recommendations through stakeholder and community engagement. The desired outcome is a corridor plan that identifies near-term actions, pilot opportunities, and long-term improvements	Starts next to LFT and spans approximately 1.5 miles away

Project	Description	Distance from Site
	capable of delivering measurable improvements in reliability, safety, transit performance, and multimodal mobility.	
Environmental Projects		
Stormwater Management Program 2017	This project reduces urban runoff pollution and protects local bodies of water from water quality impairment in response to regulatory mandates from the California State Water Resources Control Board and the U.S. Environmental Protection Agency. Program aims include: ▪ Public outreach ▪ Industry facility inspections ▪ Illicit discharge investigation and enforcement ▪ Construction site management ▪ Maintenance of the facility drainage system	Onsite
Hillview Gardens Storm Drain Project No. 2016-011 Fiscal Years 2018 to 2021	Reconfigure the storm drain system in Hillview Garden neighborhood and reroute it to a new storm drain pump station on Bon Air Road in Hillview Garden neighborhood on the east side of Magnolia north of Bon Air Road in Larkspur. The Hillview Gardens neighborhood, sandwiched between King Mountain and Corte Madera Creek, is subject to frequent flooding. The existing storm drain system has proved inadequate to handle the levels of runoff passing through the neighborhood in combination with high creek tides.	Approximately 2 miles
Corte Madera Creek Flood Management Project – Zone 9 Fiscal Year 2026	Reduce peak flood flows and overbank flooding in Corte Madera Creek, including a new maintenance access ramp (2022), the Granton Park Stormwater Pump Station (2024), restoration at the Lower College of Marin (2025), improved fish resting pools within the concrete channel, and natural channel transition and flood risk reduction work upstream. Remaining project components will proceed after the completion of the Federal Emergency Management Agency compliance process (\$10 million approved, \$1.28 million potential future).	Approximately 2 miles

Sources: City of Larkspur. n.d.

ADA = Americans with Disabilities Act

CARB = California Air Resources Board

GHG = greenhouse gas

HDPE = high-density poly ethylene

HSIP = Highway Safety Improvement Program

I-580 = Interstate 580

LFT = Larkspur Ferry Terminal

US 101 = United States Highway 101

USCG = U.S. Coast Guard

TCF = The Commons Foundation

4.2 Cumulative Impacts Analysis

The following discussion presents the cumulative impacts of the proposed Project, organized by resource area. There is the potential for cumulative impacts where other projects and the Project overlap in location or are adjacent (affecting the same resource/receptor but potentially at different times) or if they overlap in time (affecting the same resource/receptor at the same time).

The discussion in this section evaluates the potential for the proposed Project to contribute to a cumulative adverse impact on the environment. The analysis considers there to be a significant cumulative impact if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts.

The cumulative analysis that follows addresses the incremental contribution of the Project to cumulative impacts associated with aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, transportation, tribal cultural resources, utilities and service systems, and wildfire. This analysis is based on the Project impacts on each resource as described in the individual resources analyses in Chapter 3, Environmental Analysis.

4.2.1.1 Aesthetics

A significant cumulative impact on aesthetics would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Have a substantial adverse effect on a scenic vista
- In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would conflict with applicable zoning and other regulations governing scenic quality
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

As discussed in Section 3.1, the Project would have no impact on scenic resources within a state scenic highway. No consideration of cumulative impacts on this topic is warranted.

The geographic scope for aesthetics consists of the area of visual effect as defined in Section 3.1.

The Project would have no direct impact on scenic vistas; however, it may obscure views to and from scenic resource areas. While cumulative impacts may occur from the Project when considered along with other projects that would add structures that could also affect views to and from scenic resource areas, the Project would not have direct impacts on these resource areas. The impact of the Project on scenic vistas would not be cumulatively considerable.

As detailed in Section 3.1.2.4, the Project would have a significant and unavoidable impact on the existing visual character or quality of public views of the site and its surroundings, both during construction and operations. Project construction activities would occur over a 54-month period, and so activities are not considered temporary. Because impacts on visual character or quality of public views would be significant and unavoidable, Project impacts would be cumulatively considerable.

During the construction phase, temporary daytime glare may occur from construction equipment. Glare from construction equipment from the Project and other construction projects could result in a cumulative impact if the construction projects occur at the same time and in proximity to each other. However, construction equipment is not considered a source of substantial light and glare, and impacts from the Project would not be cumulatively considerable. No nighttime construction would occur, so the Project would not contribute to cumulative impacts related to light or glare affecting nighttime views. Operational lighting for the Project would be shielded and directed to the ground, whereas most current site lighting is not, and measures to reduce light and glare impacts would be implemented so that the impact on the Project would not be cumulatively considerable.

Because impacts on visual character or quality of public views would be significant and unavoidable, Project impacts would be cumulatively considerable, and cumulative impacts to aesthetics would be significant and unavoidable.

4.2.1.2 Air Quality

A significant cumulative impact on air quality would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Conflict with or obstruct implementation of the applicable air quality plan
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard
- Expose sensitive receptors to substantial pollutant concentrations
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

The air quality study area is in the Marin County Basin portion of the San Francisco Bay Area Air Basin.

The applicable air quality plan for the San Francisco Bay Area Air Basin is the *2017 Clean Air Plan* (BAAQMD 2017). The Project would comply with the applicable air quality regulations and rules that ensure air emissions resulting from the construction and operation of the Project would not exceed the Bay Area Air District (BAAD) emission thresholds that are in place ensure a project would not conflict or hinder implementation of air quality plans. MM-AQ-CNST-1 would be implemented during Project construction to ensure health risks and hazard impacts to nearby offsite workers and residents would be lower than the BAAD CEQA thresholds. Because the Project would not conflict with or obstruct implementation of the applicable air quality plan, Project impacts would not be cumulatively considerable.

The impact analysis in Section 3.2 for the threshold shows the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is a nonattainment area for an applicable federal or state ambient air quality standard was addressed as a cumulative impact. The analysis concluded that cumulative impacts related to this topic would be less than significant.

Operational criteria air pollutant emissions would have a net decrease compared to existing conditions and therefore would not be cumulatively considerable.

Diesel particulate matter emissions from Project construction activities would exceed cancer risk thresholds but would be reduced through mitigation measures. MM-AQ-CNST-1 would ensure construction activities would not result in exposure of sensitive receptors to substantial pollutant concentrations. Project operations are not expected to result in carbon monoxide hot spots or substantial

amounts of diesel particulate matter emissions. Project impacts related to exposure of sensitive receptors to substantial pollutant concentrations would not be cumulatively considerable.

The Project is not of a type of land use associated with nuisance odors that can adversely affect a substantial number of people, and construction and operation activities are not expected to cause odors that would affect nearby residents or workers. Impacts from odors produced by the Project would not be cumulatively considerable.

Cumulative impacts on air quality would not be significant.

4.2.1.3 Biological Resources

A significant cumulative impact on biological resources would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would result in a Substantial Adverse Effect, Either Directly or Through Habitat Modifications, on Any Species Identified as a Candidate, Sensitive, or Special-Status Species in Local or Regional Plans, Policies, or Regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or result in a Substantial Adverse Effect on any Riparian Habitat or Other Sensitive Natural Community Identified in Local or Regional Plans, Policies, Regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

As discussed in Section 3.3, the Project would have no impacts on State or Federally Protected Wetlands and would not Interfere Substantially with the Movement of Any Native Resident or Migratory Fish or Wildlife Species or with Established Native Resident or Migratory Wildlife Corridors, or Impede the Use of Native Wildlife Nursery Sites. No consideration of cumulative impacts on these topics is warranted.

The geographic scope for biological resources consists of the biological site assessment as defined in Section 3.3 and the ferry route corridor between the Larkspur and Downtown San Francisco Terminals.

The Project would have no impacts on special-status plant species, and therefore, there would be no cumulative impacts on these species from the Project. Noise from Project construction activities would have no impact on special-status marine mammals (California sea lions, harbor seals, dolphins, whales and porpoises) and special-status fish species, and therefore, there would be no cumulative impacts on these species from Project construction. Noise from pile driving during Project construction could affect California Ridgway's rail, black rail, and salt marsh harvest mouse. Noise impacts on these species would be reduced to less than significant through avoidance and minimization measures and mitigation measures. Cumulative impacts could occur if similar noise levels are produced by other construction projects occurring simultaneously with Project pile-driving activities.

The increase in ferry operations expected in 2050 could impact marine mammals within the ferry route corridor directly because of increased collision risk (vessel-strike) or indirectly through behavioral disturbance. The Project's increase in ferry operations would be minimal compared to existing conditions, and impacts would not be cumulatively considerable. No other projects have been identified that would result in a significant increase in marine vessel operations within the ferry route corridor that could result in significant cumulative impacts on marine mammals in this area.

Cumulative impacts on biological resources would be less than significant.

4.2.1.4 Cultural Resources

A significant cumulative impact on cultural resources would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts

that would 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, or disturb any human remains, including those interred outside of dedicated cemeteries?

The geographic scope for cultural resources are the footprints of the two Build Alternatives. As explained in Section 3.4.1.2, adjacent built-environment resources that the Project would not physically change are not included in the CEQA study area. There would not be cumulatively considerable impacts on the built-environment historical resources adjacent to the Project area.

Project construction impacts on historical resources would be limited to the LFT and would be less than significant. No other projects are proposed for the immediate vicinity of the terminal that could affect the terminal building or its setting; therefore, Project impacts on historical resources would not be cumulatively considerable. Project construction impacts on archaeological resources and human remains would be limited to those associated with unexpected encounter of undocumented archaeological resources and human remains and would be less than significant with mitigation. No other projects with potential to encounter undocumented archaeological resources or human remains are proposed for the Project site; therefore, Project impacts on archaeological resources and human remains would not be cumulatively considerable.

Project operations would have no impact on historical resources, archaeological resources, or human remains. There would be no cumulative impacts on historical resources from Project operations. Cumulative impacts on cultural resources would be less than significant.

4.2.1.5 Energy

A significant cumulative impact on energy would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would result in potentially significant environmental impact because of wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The cumulative geographic context for energy is the service areas of Marin Clean Energy and Pacific Gas and Electric Company.

As discussed in Section 3.5.2.3, Project construction activities would require large quantities of energy in the form of gasoline and diesel and would result in a short-term intensive demand for diesel fuel to power heavy excavation equipment and heavy-duty haul trucks. This energy consumption is necessary to construct the Project and would not be unnecessary. Use of Tier 4-certified construction equipment required by MM-AQ-CNST-1 and CARB anti-idling regulations would ensure energy efficiency use and minimize petroleum consumption. The Project includes design features and operational measures to increase energy efficiency during operations and maintenance. Energy consumption for Project construction and operation would not be wasteful, inefficient, or unnecessary. Other projects in the cumulative geographic context would also consume nonrenewable energy resources during construction and operation, and together those projects would represent some regional demand. The Project's contribution to that demand is limited in duration and scale. In the construction phase, energy use would be confined to two phases, and operational energy use would be offset by onsite renewable generation and by the reduction in vehicle miles traveled attributable to increased ferry service. Because the Project's incremental energy consumption would be efficient rather than wasteful, and because the state and local energy efficiency and renewable energy requirements applicable to the Project apply equally to other development in the service areas of Marin Clean Energy and Pacific Gas and Electric Company, the

Project's contribution to cumulative energy consumption would not be cumulatively considerable. Cumulative impacts on energy would be less than significant.

4.2.1.6 Geology and Soils

A significant cumulative impact would occur if the proposed Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction
- Result in substantial soil erosion or the loss of topsoil
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse
- Be located on expansive soil, creating substantial direct or indirect risks to life or property

As discussed in Section 3.6, the Project would have no impacts related to landslides, septic tanks, and unique paleontological resources, sites, or geologic features. No consideration of cumulative impacts for these topics is warranted.

The geographic scope for geology and soils cumulative study area is the Project footprint and adjacent areas.

Hazards associated with fault rupture and seismic shaking are not unique to the Project site but could affect other projects in the adjacent area. All projects in the adjacent area would need to comply with the California Buildings Standard Code, Marin County policies, and Larkspur Municipal Code seismic requirements, as applicable, which would ensure that cumulative risks to life from damage would be less than significant. The Project site is not within a mapped Alquist-Priolo earthquake fault zone, and the risk of surface fault rupture from a seismic event is very low; therefore, the impacts from fault rupture at the Project site would not be cumulatively considerable. Potential impacts at the Project site associated with soil liquefaction, seismic densification, and lateral spreading would be addressed through design and construction recommendations presented in the Project Geotechnical Report. All construction projects in the area would be required to implement similar geotechnical report recommendations, and cumulative impacts from these hazards would be less than significant.

During construction, the Project would be required to implement best management practices (BMPs) to control sediment and minimize erosion from ground disturbance. Other projects would be required to implement similar measures during ground-disturbing construction, which would result in less than significant cumulative soil erosion and loss of topsoil impacts.

Impacts associated with potential liquefaction, lateral spreading, soil compression, settlement and subsidence because of dewatering in soil that is unstable or could become unstable because of construction and operation, and from being located on expansive soils would be reduced through adherence to design recommendations presented in the Project Geotechnical Report. All construction projects in the area would be required to implement similar Project Geotechnical Report recommendations, and cumulative impacts from these hazards would be less than significant.

Cumulative impacts on geology and soils would be less than significant.

4.2.1.7 Greenhouse Gas Emissions

From the standpoint of CEQA, GHG impacts on climate change are inherently cumulative and were discussed in detail in Section 3.7; a summary of that discussion is provided here.

A significant cumulative impact would occur if, when past, present and probable future projects are considered together with potential impacts from the proposed Project, they were to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

The global nature of climate change requires a broad analytic approach. Although Section 3.7 focuses on GHG emissions generated in the Project area because of construction and operation, the analysis considers potential regional and global GHG impacts.

GHG emissions from Project construction activities would be temporary and variable. BAAD has not developed a quantitative threshold of significance for construction-related GHG emissions. Construction activities would incorporate BMPs, including those in the BAAD CEQA Guidelines to minimize GHG emissions, and Project GHG emissions during construction would not be cumulatively considerable.

Project operations would produce direct GHG emissions from ferry operation and vehicle trips and indirect GHG emissions associated with electricity consumption during operation. CEQA Guidelines Section 15183.5(b) allows a lead agency to determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. Because the Project would be consistent with a local GHG reduction strategy that meets the criteria in CEQA Guidelines Section 15183.5(b), GHG emissions are not considered cumulatively considerable.

The proposed Project includes measures that would be consistent with state regulations that will reduce GHG emissions and the applicable policies described in the Scoping Plans for Assembly Bill 32, Senate Bill 32, the City of Larkspur's *Climate Change Action Plan 2030*, *2017 Clean Air Plan*, and *Plan Bay Area 2050+* (City of Larkspur 2021; BAAQMD 2017; MTC and ABAG 2026). Consequently, the proposed Project would not conflict with achievement of Assembly Bill 32 reduction goals for 2020, Senate Bill 32 reduction goals for 2030, or the regional transportation plan/sustainable community strategy reduction goals for 2020 and 2035.

Cumulative impacts from GHG emissions would be less than significant.

4.2.1.8 Hazards and Hazardous Materials

A significant cumulative impact from hazards and hazardous materials would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4 mile of an existing or proposed school

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

As discussed in Section 3.8, the Project would have no hazard or hazardous material impacts associated with being located on a site that is included on a List of Hazardous Materials Sites Compiled Pursuant to Government Code Section 65962.5, being located within an Airport Land Use Plan or within Two Miles of a Public Airport or Public Use Airport, and exposing People or Structures to a Significant Risk of Loss, Injury or Death Involving Wildland Fires. No consideration of cumulative impacts for these topics is warranted.

The geographic scope for hazards and hazardous material includes sites within 0.25 mile of the project.

The Project would involve routine transport, use, and disposal of hazardous materials in quantities typical of construction activities and upset and accident conditions involving the release of hazardous materials into the environment could occur. These potential impacts would be limited to the duration of construction and would be minimized through implementation of a stormwater pollution prevention plan (SWPPP) and BMPs during construction activities. Implementation of the SWPPP requirements would result in these potential impacts during construction of the Project not being cumulatively considerable. During operations, transportation, use, and disposal of hazardous materials would remain similar to current conditions. In addition, the District would obtain an amendment to the industrial general permit SWPPP to address changes in site conditions that would further reduce the potential for hazardous materials releases during Project operations. Because there would be no significant change to existing conditions, there would not be a cumulatively considerable significant impact on the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The Project could involve transport of small quantities of hazardous materials typical of construction activities and could have the potential for accidental spills or releases of hazardous substances during construction within 1/4 mile of the Children's Cottage Cooperative Preschool. These potential impacts would be limited to the duration of construction and would be minimized through implementing a SWPPP and BMPs during construction activities. Implementation of the SWPPP requirements would result in these potential impacts during construction of the Project not being cumulatively considerable. During operations, the generation, use, and disposal of hazardous materials would remain similar to current conditions. Because there would be no significant change to existing conditions, there would not be a cumulatively considerable significant impact from hazardous emissions or handling of hazardous material to existing or proposed schools within 1/4 mile of the Project.

During Project construction, temporary and intermittent traffic delays, typical with construction projects, could occur within the Project vicinity and could affect emergency response and evacuation plans. This potential impact would be reduced through traffic control plans (TCPs) and traffic management plans (TMPs) that would maintain access during construction. The TCPs and TMPs would address construction-related traffic, along with any other construction project occurring at the same time, that could affect emergency access. The plans would ensure emergency vehicles have priority access during construction. Project operations would not substantially alter site operations or circulation patterns and would not alter the surrounding road network in a way that would impair or interfere with emergency response or evacuation plans. Final design would be reviewed for compliance with applicable emergency access requirements. Other projects would undergo a similar review. Impacts on emergency response plans and emergency evacuation plans from Project operations would not be cumulatively significant.

Cumulative impacts from hazards and hazardous materials would be less than significant.

4.2.1.9 Hydrology and Water Quality

A significant cumulative impact on hydrology and water quality would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:
 - Result in substantial erosion or siltation on- or offsite
 - Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite
 - Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
 - Impede or redirect flood flows
 - Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding because of the failure of a levee or dam
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation

As discussed in Section 3.9, the Project would have no hydrology or water quality impacts associated with implementation of a water quality control plan or sustainable groundwater management plan, and placing housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or FIRM or other flood hazard delineation map. No consideration of cumulative impacts for these topics is warranted.

The geographic scope for hydrology and water quality cumulative study area is the Project footprint and adjacent areas.

Project construction activities could affect surface and ground water quality, groundwater supplies, and alter site drainage patterns. Impacts would be temporary and occur only during construction. Implementation of site-specific BMPs that will be identified in the Project SWPPP (MM-HYD-CNST-1) during construction would minimize potential impacts on water quality and temporarily altered site drainage patterns. The District is replacing the legacy fleet with the Liwa class vessels. The Liwa class vessels, even with increased ferry service, would not exceed Bay Plan turbidity threshold. Other construction projects would also be required to implement site-specific BMPs. Application of BMPs during all construction projects would result in cumulative impacts on these topics not being significant.

Groundwater supplies would not be used for construction activities because municipal water supplies do not use groundwater as a water source. For the same reason, water required to support other projects would also not use groundwater supplies, so there would be no cumulative impacts on groundwater resources. Impacts on groundwater supplies would be limited to dewatering, which may be required in Project excavation areas. This would be a temporary and minimal use of groundwater that would not result in a cumulatively considerable impact.

No substantial change in the amount of impervious surface would be created, and stormwater drainage conditions after construction would remain the same as existing conditions. The District's existing

industrial general permit would be amended to include the new parking s into the facility's BMPs (MM-HYD-OP-1). Project operations would not use groundwater supplies. Therefore, Project operations would not result in cumulatively considerable impacts on surface or groundwater quality or groundwater recharge or from altered drainage patterns.

As described in Section 3.9, the Project site is within a flood hazard and tsunami inundation zone. Construction activities would include BMPs to reduce the release of pollutants because of construction site inundation. Other construction projects occurring in the same flood hazard and tsunami inundation area would also be required to implement BMPs so that cumulative impacts would not be significant. The Main Parking would be constructed above the flood hazard zone, which would reduce the risk of pollutant release from inundation from Project operations, and the impact from flood hazard would not be cumulative considerable. While the Project is in a tsunami inundation zone, the potential for significant damage at this location is considered very low. This same tsunami condition would apply to other projects occurring adjacent to the Project site, and cumulative impacts would not be significant.

Cumulative impacts on hydrology and water quality would be less than significant.

4.2.1.10 Land Use and Planning

A significant cumulative impact on land use and planning would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would physically divide an established community or cause a significant environmental impact because of a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The geographic scope for land use and planning consists of the area within and around the Project area.

The Project would not physically divide an established community. During construction, temporary disruptions to circulation and access may occur because of phased construction activities, including closure of the North Lot during Phase 1 (up to 18 months) and potential closure of the Main Lot during Phase 2 (up to 36 months). However, these effects would be temporary and managed through implementation of a TMP and TCPs that would maintain access for vehicles, pedestrians, bicyclists, and transit users, as well as require coordination of construction traffic or detours with other adjacent projects. Any other construction projects occurring in the same area that could also result in similar disruptions to circulation and access would also be required to coordinate with the Project and implement a TMP and TCPs to maintain access and minimize construction-related traffic delays. Construction-phase impacts on circulation and access would be temporary. Because all construction projects would develop and implement TCPs and coordinate with each other, the impacts from construction projects occurring simultaneously would be avoided or minimized and would not be cumulatively considerable.

During operation, the Project would improve overall connectivity by enhancing access to the ferry terminal and regional transit services by including improvements such as a new pedestrian crossing, enhanced bicycle parking, and improved circulation. The Project would also strengthen connections between the ferry terminal and surrounding communities. Because the Project would improve existing access and circulation, it would not contribute to cumulative impacts related to physically dividing an established community.

As discussed in Section 3.10, the Project is consistent with Bay Conservation and Development Commission, *Plan Bay Area 2050+* (MTC and ABAG 2026), *The City of Larkspur General Plan 2040* (City of Larkspur 2024), *City of Larkspur Bicycle and Pedestrian Master Plan* (City of Larkspur 2017), and *City of Larkspur Climate Action Plan 2030* (City of Larkspur 2021). Therefore, the Project would not result in a

cumulatively considerable environmental impact because of a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

Cumulative impacts to land use and planning would be less than significant.

4.2.1.11 Noise

A significant cumulative impact to noise would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would result in the following:

- Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Generation of excessive groundborne vibration or groundborne noise levels?

As discussed in Section 3.11.3.2, there would be no Project impacts from placement of project-related activities in the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, resulting in exposure of people residing or working in the project area to excessive noise levels. No consideration of cumulative impacts on this topic is warranted.

The geographic scope for noise consists of the area within a 1/2-mile radius of the Project area.

Noise levels from construction activities at both the North Lot and Main Lot sites would not exceed applicable Federal Transit Administration (FTA) noise impact criteria and would be reduced further through noise control practices. Because no other construction projects that could result in noise impacts would occur adjacent to the Project site and at the same time as Project construction noise, impacts would not be cumulatively considerable. Noise from ferry terminal operations would not result in changes to the existing day-night sound level at sensitive receptors and would not exceed the threshold for moderate to severe impacts at sensitive receptors as defined by the FTA. Noise generated by increased vehicle traffic to and from the ferry terminal would increase noise traffic level by 1 A-weighted decibel, which would not be perceptible over existing ambient noise levels and would exceed the threshold for moderate to severe impacts under FTA noise impact criteria. Because a similar increase in traffic noise levels would occur because of anticipated regional growth even without the Project, Project traffic noise impacts would not be cumulatively considerable.

Groundborne vibration levels during Project construction would not exceed annoyance thresholds at any sensitive receptors and would not exceed California Department of Transportation (Caltrans) building damage thresholds. Because no other construction projects that could result in vibration impacts would occur adjacent to the Project site and at the same time as Project construction, vibration impacts during Project construction would not be cumulatively considerable. Vibration impacts during operations would be similar to existing conditions and as such would not be cumulatively considerable.

Cumulative impacts to noise would be less than significant.

4.2.1.12 Public Services and Recreation

A significant cumulative impact on public services and recreation would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would result in substantial adverse physical impacts associated with the

provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for fire protection or police protection.

As discussed in Section 3.13.3.2, there would be no Project impacts on schools, parks, and other public facilities, including libraries, nor to use of recreation facilities or from construction or expansion of recreation facilities. No consideration of cumulative impacts for these topics is warranted.

The study area for public services and recreation is the City of Larkspur.

Regarding impacts on fire protection and police protection, the Project would not cause unplanned population growth or vehicle trips on the surrounding roadways associated with construction worker and employee commutes, and deliveries. Increased ferry ridership during operation would not contribute to substantial congestion on the surrounding roadways when compared to existing traffic. Construction and operation of the Project is not anticipated to substantially affect performance objectives or response times for fire or police protection services. The Project would not include or require the provision of new or physically altered fire or police protection facilities. Because there would be no construction of new or physically altered fire or police facilities, the construction of which could result in environmental impacts, Project impacts associated with fire and police protection would not be cumulatively considerable.

Cumulative impacts on public services and recreation would be less than significant.

4.2.1.13 Transportation

A significant cumulative impact to transportation would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities,
- Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b),
- Substantially increase hazards because of a geometric design feature (such as sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment),
- Result in inadequate emergency access.

The geographic scope for transportation consists of the area within and around the Project area and includes the roadway network, transit service, and pedestrian and bicycle facilities that provide access to and from the terminal.

Project operations would not conflict with applicable local transportation plans and policies, addressing transit, roadway, bicycle, or pedestrian circulation, and would not affect emergency vehicle access or emergency response times and impacts related to emergency access. During Project construction, the City of Larkspur would require a TMP and TCPs to maintain safe and efficient circulation for vehicles, pedestrians, and bicyclists and minimize construction-related delays and manage circulation. The TMP would require coordination with emergency service providers, and the TCPs would maintain emergency access during construction. Impacts from the Project on these topics would not be cumulatively considerable.

Project construction activities would result in temporary increases in vehicle miles traveled (VMT). This effect would be temporary and cease upon completion of construction; therefore, it would not be

cumulatively considerable. Project operations would not increase VMT and thus would not contribute to cumulative impacts associated with VMT.

The TMP and TCPs would avoid temporary hazards resulting from conflicts with Project construction activities.

Under Alternatives 1 and 2 in 2050, projected queue lengths would exceed the available storage length and could extend onto the US 101 mainline at the US 101 southbound off ramp to Sir Francis Drake Boulevard. This queuing could result in a speed differential between the off ramps and the mainline that exceeds the Caltrans safe speed differential threshold resulting in a significant impact. Potential improvements to address this hazard would be subject to Caltrans approval, and the District cannot undertake a project to mitigate the safety impact. This impact is significant and unavoidable, and therefore, it is cumulatively considerable.

Because an increase in hazards on US 101 would be a significant and unavoidable impact, Project impacts would be cumulatively considerable, and cumulative impacts on transportation would be significant and unavoidable.

4.2.1.14 Tribal Cultural Resources

A significant cumulative impact to tribal cultural resources would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would cause a substantial adverse change in the significance of a tribal cultural resource, defined in California Public Resources Code (PRC) § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k) or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC § 5024.1. In applying the criteria set forth in subdivision (c) of PRC § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Ground-disturbing construction across the region carries the potential to disturb previously undiscovered tribal cultural resources, and the incremental loss of such resources is cumulative in character. The Project's potential contribution is limited by the extent of ground disturbance, which would occur on previously developed and previously disturbed land within the existing terminal footprint, and by the mitigation measures requiring monitoring, work stoppage, and tribal consultation upon discovery. PRC section 21080.3.1 requires consultation with California Native American tribes for any project subject to an EIR, so comparable protections would apply to other projects in the area. The Project's incremental contribution to cumulative impacts on tribal cultural resources would not be cumulatively considerable.

Cumulative impacts on tribal cultural resources would be less than significant.

4.2.1.15 Utilities and Service Systems

A significant cumulative impact on utilities and service systems would occur if the Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that would do the following:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects

- Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years
- Result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments
- Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste

The geographic scope for utilities and service systems consists of service areas of the water, wastewater, solid waste disposal, natural gas, and electricity suppliers that provide service to the Project site. For stormwater, it is the storm drain system on the Project site and adjacent areas.

Increased demand for water, wastewater treatment, and solid waste disposal capacity from the Project would combine with demand from other projects in the same service areas, including the Oak Hill Workforce Housing project and the 2000 Larkspur Landing Circle development. The Project would not introduce a new residential or employment population and would not require new or expanded utility facilities. Its incremental demand would consist of increased solid waste and wastewater disposal proportional to ferry ridership growth, phased over the period through 2050. Service providers plan for demand growth through their own capacity planning processes, and the Project's increment falls within the growth already anticipated for the service areas. The Project's contribution to cumulative demand would therefore not be cumulatively considerable.

Cumulative impacts on utilities and service systems would be less than significant.

4.2.1.16 Wildfire

A significant cumulative impact from wildfire would occur if the proposed Project, when considered together with past, present, and probable future projects, would contribute to cumulatively considerable impacts that, if located on or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would 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; or expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes.

The geographic scope for wildfire cumulative study area is the Project site and surrounding area within approximately 1/2 mile.

The Project site and surrounding area are within a developed urban area and not within or near a Very High Fire Hazard Severity Zone.

Because the Project would not occur on or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, cumulative impacts on wildfire would be less than significant.