

6. Other CEQA-Required Analysis

This section discusses other California Environmental Quality Act (CEQA)-required analysis, including impacts from growth, significant and unavoidable environmental impacts, and significant irreversible environmental changes.

6.1 Growth-Inducing Impacts

The CEQA requires a consideration of a project's capacity to induce growth. Growth inducement would occur if the amount of population or employment growth projected to occur because of the Larkspur Ferry Service Expansion and Parking Project (Project) would exceed planned levels. As discussed in Section 2.2 and evaluated in detail in the Larkspur Ferry Service and Parking Expansion Project Transportation Impact Assessment (Appendix G), the proposed Project is designed to accommodate Transportation Authority of Marin forecasts based on the travel demand model. The model incorporates regional population and employment forecasts, travel patterns, and transportation network conditions. Increased development and growth in an area are dependent on a variety of factors, including employment and other opportunities, availability of developable land, and availability of infrastructure, water, and power resources. The Project does not include the development of housing or businesses, improved access to undeveloped land, or increased capacity of any utilities, and it would therefore not directly induce population. The Project Build Alternatives are consistent with the City of Larkspur planning documents, including *City of Larkspur 2040 General Plan*, *City of Larkspur Climate Change Action Plan 2030*, and *City of Larkspur Bicycle and Pedestrian Master Plan* (City of Larkspur 2017, 2021, 2024).

Approximately 108 individuals are currently employed at the existing Larkspur Ferry Terminal (LFT). Although ferry service would increase incrementally from 42 up to a maximum of 76 in 2050 and beyond, neither the number employees at the LFT nor the number of vessels is expected to change. Additionally, it is anticipated that maintenance needs for the new Liwa-class vessels would not require additional administration, operations, or maintenance work staff compared to the existing work force. If new positions are approved in 2050 and beyond, any potential increase in employment opportunities at the LFT would be considered minor and would not result in a substantial increase in the number of jobs available nor any exceedance planned growth levels either in the city or county. The Project is in an area that is already heavily developed with a mix of uses, including commercial and residential uses. The Project would not require the construction of any new roads. Overall, the proposed Project would not induce growth in the region surrounding the Project area and would have no impact on planned growth levels.

6.2 Significant and Unavoidable Environmental Consequences

Section 21067 of CEQA and Sections 15126(b) and 15126.2(b) of the State CEQA Guidelines require that an environmental impact report describe any significant impacts, including those that can be mitigated but not reduced to a less-than-significant level. Furthermore, where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the Project is being proposed, notwithstanding their effect, should also be described.

6.2.1 Alternative 1: Increased Ferry Service and New Parking Garages

Implementation of Alternative 1 would result in the following significant and unavoidable impacts:

- **Aesthetics.** Construction and operation of the proposed parking garages would result in significant and unavoidable impacts related to changes in visual character and public views of the Project area.
- **Transportation.** Alternative 1 would result in a significant and unavoidable transportation impact associated with freeway off-ramp queue spillback during future year 2050 conditions.

Aesthetics

Construction

Alternative 1 would construct a six-level parking garage in the North Lot and a five-level parking garage in the Main Lot. The visual analysis concluded that, given the anticipated 54-month total construction schedule, construction activities would not be considered temporary and could alter the visible landscape at the sites with heavy equipment, bright colors, material staging, and other construction elements over an extended period. Construction activities could also result in an invaded sense of privacy and disruptive views. Mitigation measure **MM-AES-CNST-1** would reduce visual impacts from construction by requiring visual screening of disruptive construction activities near sensitive viewers, which would also help maintain privacy but would not reduce to a less-than-significant level. Thus, because of the prolonged time the construction activity impacts would be visible, they were determined to substantially alter the existing visual character and quality of public views by changing the existing visual character and quality of public views of the site and its surroundings during construction. There is no feasible mitigation to reduce the anticipated length of the construction schedule, and therefore, impacts are *significant and unavoidable*.

Cumulative Impacts

Additionally, the unavoidable significant impacts would also be considered cumulatively considerable. If other cumulative projects are constructed within the Area of Visual Effect for the Project during the construction period for Alternative 1, the proposed Project would also result in significant and unavoidable cumulative visual impacts that, when considered with other projects, would substantially alter the existing visual character and quality of public views of the site and its surroundings during construction the construction period for Alternative 1. Mitigation measure **MM-AES-CNST-1** would reduce visual impacts from construction but not reduce them to a less-than-significant level, and therefore, the visual cumulative impacts are considered *significant and unavoidable after mitigation*.

Operation

After the completion of construction, the visual analysis concluded that the new parking garages would substantially alter the existing visual character and quality of public views surrounding the LFT. During final design, the design team would incorporate aesthetic treatments intended to visually soften the appearance of the parking garages; however, there is no feasible mitigation to reduce the mass of the new garages, and Alternative 1 would result in substantial adverse changes to public views and visual character surrounding the LFT. Therefore, impacts are *significant and unavoidable*.

Cumulative Impacts

The unavoidable significant aesthetic impacts associated with the unmitigable mass of the new garages would also be considered cumulatively considerable. There is no feasible mitigation to reduce the mass of

the new garages, and their presence under Alternative 1 would contribute to a permanent substantial adverse alteration of the existing visual character and quality of public views surrounding the LFT from other cumulative project locations within Area of Visual Effect. Aesthetic impacts result in *significant and unavoidable* cumulative impacts on visual character and quality within the Area of Visual Effect.

Transportation

Operation

Alternative 1 would incrementally increase ferry service from 42 up to a maximum of 76 revenue trips per day to accommodate ferry ridership and associated vehicle trips to the LFT in 2050. The transportation analysis concluded that under Alternative 1 in 2050, projected queue lengths would exceed the available storage length (refer to Table 3.14-7) and could extend onto the United States Highway 101 (US 101) mainline during the AM peak period. Although this queuing would generally coincide with periods of freeway mainline congestion, it is likely that at times the speed differential between the off-ramp and the mainline will exceed 30 miles per hour, thus exceeding the California Department of Transportation (Caltrans) safe speed differential threshold. Potential improvements to address queue spillback would be subject to Caltrans approval. The Golden Gate Bridge, Highway and Transportation District (District) itself cannot undertake a project to mitigate the safety impact, and there are no feasible mitigation measures within the District's jurisdiction. Therefore, this impact is considered to be *significant and unavoidable*.

Cumulative Impacts

Traffic impact analysis is a cumulative analysis by nature because it uses the regional land use models and traffic forecasts that would include the cumulative projects considered for this Project. Thus, significant and unavoidable Project traffic impacts are cumulatively considerable and represent a significant unavoidable cumulative traffic impacts at the US 101 southbound off-ramp and Sir Francis Drake Boulevard. There are no feasible mitigation measures within the District's jurisdiction, and the cumulative impact is *significant and unavoidable*.

6.2.2 Alternative 2: Increased Ferry Services, New Parking Garages, and Enhanced Transportation Demand Management

Implementation of Alternative 2 would result in the following significant and unavoidable impacts:

- **Aesthetics.** Construction and operation of the proposed parking garages would result in significant and unavoidable impacts related to changes in visual character and quality public views of the Project area.
- **Transportation.** Alternative 2 would result in a significant and unavoidable transportation impact associated with freeway off-ramp queue spillback during future Year 2050 conditions.

Aesthetics

Construction and Operation

Alternative 2 would construct a six-level parking garage in the North Lot and a four-level parking garage in the Main Lot. One less parking level for the Main Lot garage would result in a shorter construction schedule and reduced garage height compared to Alternative 1. However, the aesthetic impacts would be substantially the same as discussed for Alternative 1. Similarly, given the overall impacts related to prolonged visual disturbance associated with the construction schedule and that there is no feasible mitigation measures to reduce the length of the construction schedule or reduce the mass of the new

garages, Alternative 2 would result in substantial and adverse alterations of visual character and quality of public views of the site and its surroundings during construction and operation. These aesthetic impacts would remain *significant and unavoidable*.

Cumulative Impacts

As discussed previously for Alternative 1, for Alternative 2, the significant and unavoidable impacts would be cumulatively considerable. Neither the length of the construction schedule nor the mass of the new garages can be mitigated and would contribute substantial alteration of the existing visual character and quality of public views surrounding the LFT and from other cumulative Project locations within the Area of Visual Effect. The Alternative 2 aesthetic impacts on areas surrounding the LFT and from other areas within the Area of Visual Effect where the LFT is visible would result in *significant and unavoidable* cumulative impacts.

Transportation

Operation

Alternative 2 would also incrementally increase ferry service from 42 up to a maximum of 76 revenue trips per day to accommodate forecast ferry ridership and associated vehicle trips to the LFT in 2050. Similarly to Alternative 1, the transportation analysis concluded that under Alternative 2 in 2050, projected queue lengths would also exceed the available storage length and could extend onto the US 101 mainline during the AM peak period. It should be noted that Alternative 2 has one less parking level in the Main Lot and introduces enhanced transportation demand management to accommodate the same forecast ferry ridership with less onsite parking. Alternative 2 results in less Project-related trips in 2050, resulting in a shorter queue compared to Alternative 1. However, the associated queue still exceeds the Caltrans safe speed differential threshold. There are no feasible mitigation measures within the District's jurisdiction, and Alternative 2 transportation impacts are also considered to be *significant and unavoidable*.

Cumulative Impacts

Similarly, as discussed for Alternative 1, the significant and unavoidable traffic impacts for Alternative 2 are cumulatively considerable and represent a *significant and unavoidable* cumulative traffic impact at the US 101 southbound off-ramp and Sir Francis Drake Boulevard.

6.2.3 No-Project Alternative

There would be no significant and unavoidable impacts under the No-Project Alternative.

6.3 Significant Irreversible Environmental Changes

CEQA requires evaluation of irreplaceable resources to ensure that their use is justified. State CEQA Guidelines Section 15126.2(d) describes potential significant irreversible changes, including "use of nonrenewable resources during the initial and continued phases of a project."

Neither Build Alternative would commit future generations to specific uses that are incompatible with existing and reasonably foreseeable conditions. The Project would provide an increased opportunity for both those choosing to drive and park and those choosing other modes that avoid driving and reduce greenhouse gases and vehicle miles traveled compared to the No-Project Alternative.

Under the No-Project Alternative, ferry service would continue to be provided under the existing conditions. The consumption of nonrenewable resources that can be attributed to the District's ferry operation would continue. Implementation of the Build Alternatives would increase ferry service and provide additional capacity through parking or enhanced transportation demand management for arrivals and departures for forecast ridership to 2050 and beyond.

Construction of the Build Alternatives would entail the one-time, irreversible, and irretrievable commitment of nonrenewable resources, such as labor required for planning, design, construction, and operations; energy (fossil fuels used for construction equipment and transportation of workers and materials); and construction materials (such as concrete, steel, lumber, sand, gravel, metals, and water).

Although these expenditures would be irrecoverable, there is adequate supply of these resources to complete the proposed Project without causing a significant environmental impact on the continued availability or supply of these resources. As described in Section 3.5, Energy, **MM-AQ-CNST-1** will require the contractor to use Tier 4 equipment. Tier 4 engines maximize thermal efficiency and optimize fuel burn rates compared to older, legacy equipment tiers. Tier 4 equipment requirements fleets combined with standard California Air Resources Board anti-idling regulations would ensure energy efficiency and minimize petroleum use during construction. The Project would also incorporate renewable energy through solar generation, along with other energy efficiency and sustainability features. Annual clean energy output is anticipated to be up to 5,700,000 kilowatt-hours per year. Overall, there is expected to be a net surplus of over 4.5 million kilowatt-hours per year to power electric vehicle charging stations and elevators, and excess energy would be exported back into Pacific Gas & Electric Company's regional grid. The analysis in Section 3.5 shows that the construction and operation of either Build Alternative would not result in unnecessary, inefficient, or wasteful use of energy resources.

Overall, neither construction nor the operation of the Build Alternatives would result in significant irreversible environmental changes, including the availability and supply of resources as compared to the No-Project Alternative.