

VI. OTHER CEQA CONSIDERATIONS

As required by the California Environmental Quality Act (CEQA), this chapter discusses the following types of impacts that could result from implementation of the Larkspur SMART Station Area Plan: effects found not to be significant; growth-inducing impacts; unavoidable significant environmental impacts; and significant irreversible changes.

A. EFFECTS FOUND NOT TO BE SIGNIFICANT

Meetings among City of Larkspur staff involved in the project planning and review, and consultants for the City, were held to preliminarily determine the scope of the City of Larkspur SMART Station Area EIR. In addition, a Notice of Preparation (NOP) was circulated on January 8, 2013, and a public scoping session was held on January 22, 2013, to solicit comments from the public and agencies about the scope of this Draft EIR. Written comments received on the NOP (included in Appendix A), as well as oral comments taken in at the scoping session (included in Appendix A), were considered in the preparation of the final scope for this document and the evaluation of the proposed project.

The environmental topics analyzed in Chapter IV, Setting, Impacts and Mitigation Measures, represent those topics which generated the greatest potential controversy and expectation of adverse impacts. The topics found to be less than significant, and not analyzed in the EIR, are described below.

The following four topics were considered but not addressed in this EIR because it was determined that the project would not cause significant impacts related to these topics per the following discussion: agricultural resources; population and housing; recreation; and visual resources.

1. Agricultural Resources

No agricultural resources are located in or near the Plan area. The land within the Plan area is classified as “Urban and Built-Up Land” or “Other Land” by the State Department of Conservation, and is not identified as farmland. Development associated with the Station Area Plan would not convert agricultural land to a non-agricultural use. In addition, no parcels within the Plan area are zoned for agricultural use; as such, the implementation of the Station Area Plan would not conflict with existing zoning for agricultural uses or Williamson Act contracts. There would be no impacts to agricultural resources.

2. Population and Housing

Implementation of the Station Area Plan would result in the construction of the following new development within the Plan area: 920 dwelling units; 39,500 square feet of office space; 77,500 square feet of retail space; and 60,000 square feet of hotel space. This would be expected to result in

2,033 new residents¹ and 558 new employees² associated within implementation of the Station Area Plan.

As required by CEQA, an EIR must discuss whether a project, if implemented, would induce substantial population growth in an area, either directly or indirectly; displace substantial numbers of existing housing, or displace substantial numbers of people necessitating the construction of replacement housing elsewhere. As discussed in Chapter III, Project Description and Section IV.A, Land Use, the project would not displace existing housing or people, and no impacts would occur relative to these criteria. However, a key objective of the project is to increase Larkspur's housing supply, particularly affordable housing opportunities, near the SMART Station, and meet the City's share of regional housing needs, and this issue is discussed further below.

The Station Area Plan process and effort is supported by Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) through provision in May 2011 of a Priority Development Area (PDA) Planning Grant because the Station Area Plan supports the goals of ABAG and MTC. These goals are identified in the adopted Plan Bay Area,³ a long-range transportation and land-use/housing strategy for the San Francisco Bay Area region. The shared goals are to:

- Boost transit ridership and reduce vehicle miles traveled.
- Increase walking, bicycling, carpooling, carsharing, local transit and other transportation options for people in the area.
- Increase the housing supply, particularly affordable housing near station areas.
- Locate key services and retail opportunities near station areas.

ABAG and MTC developed and adopted Plan Bay Area in July 2013 to address the expected population and employment growth in the region, as ABAG expects that the population of the Bay Area region will grow from 7,341,700 residents in 2010 to 8,719,300 residents in 2030. During that period, the number of employed residents is expected to grow from 3,410,300 to 4,547,100. Plan Bay Area provides a strategy for meeting 80 percent of the region's future housing needs in PDAs, which are neighborhoods within walking distance of frequent transit service, offering a wide variety of housing options, and featuring amenities such as grocery stores, community centers, and restaurants. Due to the concentration of existing and proposed transit (e.g., ferry terminal, Marin Airpporter, SMART Station), multi-modal transportation features (e.g., bike and pedestrian pathways), and opportunity sites for new housing and services, the Plan area qualified for and received a PDA grant. The housing growth projections in the Station Area Plan are therefore consistent with the current regional plan objectives for growth.

¹ Residents were calculated using a 2.21 residents per household (920 dwelling units) rate.

² Employees were calculated using a rate of 1 employee per 250 square feet of office/retail space and 0.9 employee per hotel room.

³ Association of Bay Area Governments, Metropolitan Transportation Commission, 2013. *Draft Plan Bay Area, Strategy for a Sustainable Region*. March. Adopted with revisions July 18, 2013.

Previous growth forecasts for Larkspur were included in the 2009 ABAG Building Momentum Projections and Priorities Report⁴ that estimated in 2010, the population of Larkspur was 12,200 residents, and that the 2035 population would be 13,200 residents (a 1,000 resident increase which is 1,033 residents lower than the potential increase estimated under the Station Area Plan). As described in the 2009 ABAG report, development potential was estimated using general plans, specific plans and other municipal planning documents.⁵ For Larkspur, the General Plan document was adopted in 1990, long before the SMART rail line was considered or the Station Area Plan was prepared. The City is currently in the process of updating its 1990 General Plan, and the Larkspur SMART Station Area Plan will be incorporated into the General Plan Update, providing guidance for the future of the Station area. In the intervening 23 years since the adoption of the 1990 General Plan, the City, Marin County and the region have embraced sustainable planning goals that focus new growth near high quality transit nodes.

To support the goals of focusing new growth in the Plan area and providing more housing, especially affordable housing, the Station Area Plan proposes amendments to the Zoning Ordinance, the General Plan, and the Housing Element, including:

- Amend the Zoning Ordinance to provide density bonuses and other incentives for projects including senior and affordable housing, consistent with State law. Encourage an increase in the supply of well-designed housing for extremely low, very low, low and moderate income households.
- In order to allow for land use flexibility on most of the priority development sites, the Station Area Plan adds two new land use designations (Mixed-Use and Administrative & Professional Two) requiring Amendments to the General Plan.
- Update the Housing Element to address affordable housing preservation and production in the Plan area, and undertake actions identified in the Plan to support an adequate supply of high-quality, affordable housing in the Plan area.

Because the Station Area Plan has been prepared as an effort to establish a land use plan and policy framework that will concentrate and guide development in the Plan Area toward uses that will support transit ridership and meet the City's regional housing goals; is part of the City's General Plan update process, and is consistent with the regional Plan Bay Area, it would not create a significant impact by inducing substantial unforeseen population growth in an area, either directly or indirectly.

3. Recreation

According to the 1990 General Plan, there are 51.3 acres of park within the City of Larkspur. This translates into approximately 4.2 acres of parkland per 1,000 residents. With the addition of the new residents associated with implementation of the Station Area Plan, this would result in a reduction to 3.6 acres of parkland per 1,000 residents. This rate would still be above the 1972 General Plan ratio identified in the 1990 General Plan of 2.6 acres of parkland per 1,000 residents. Given the amount of

⁴ Association of Bay Area Governments (ABAG), 2009. *Building Momentum, San Francisco Bay Area Population, Household and Job Forecasts.*

⁵ Ibid.

parkland within not only Larkspur, but Marin County, implementation of the Station Area Plan would not result in the degradation of existing recreation facilities.

4. Visual Resources

The Plan area contains several existing views to Corte Madera Creek, San Francisco Bay, and surrounding hillsides. While the City of Larkspur does not have an ordinance protecting views within the City, there are several goals, policies and actions within the Environmental Resources Element of the 1990 General Plan that address views. These include:

Environmental Resources Element

Goal 1: Preserve and enhance a variety of open space features including ridgelines, the wetlands along the Bay and the creeks, wildlife habitats, view corridors, and other amenities which contribute to a sense of openness in Larkspur.

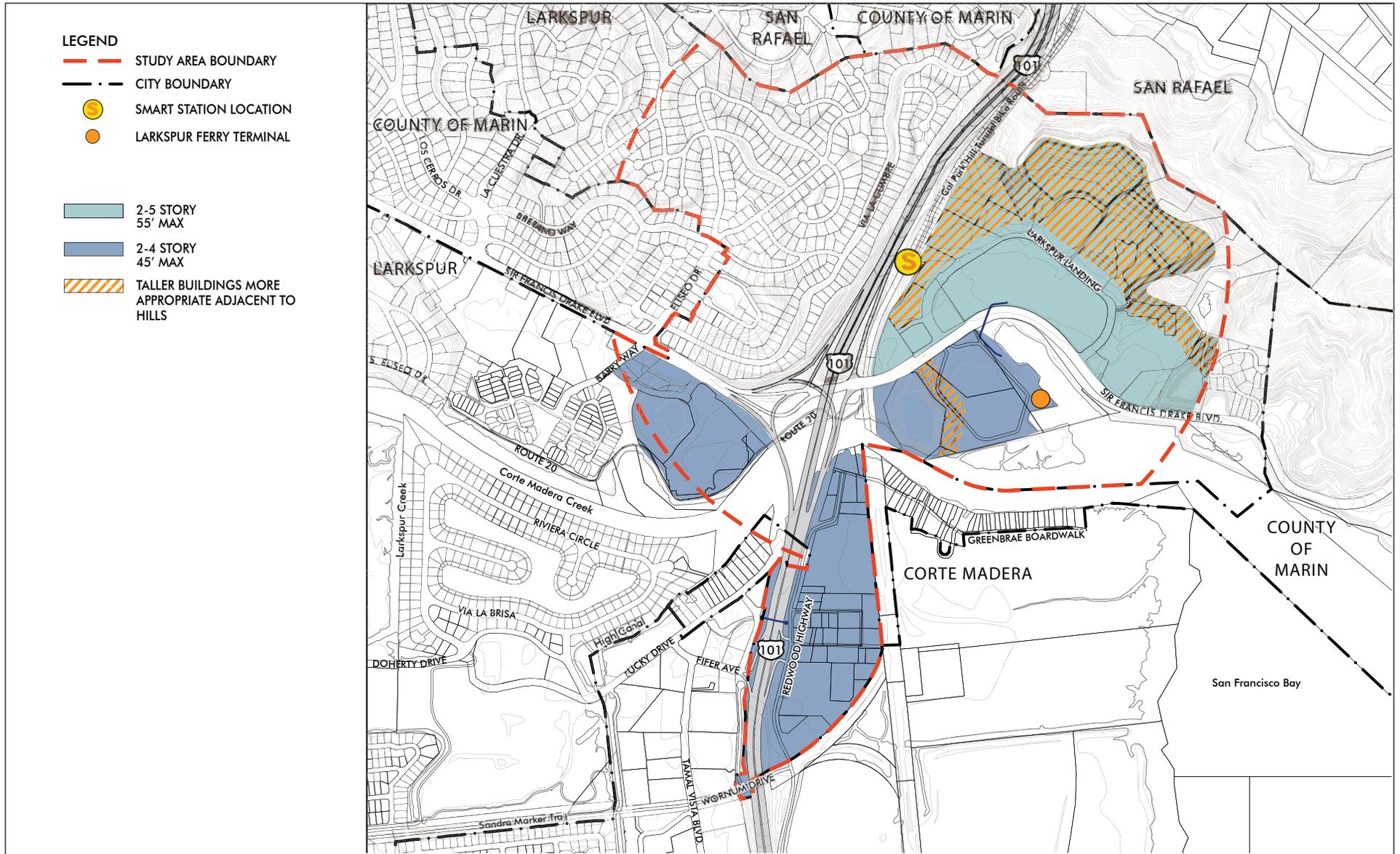
- Policy f: Increase visual access to the Bay and Corte Madera Creek.
 - Action Program [9]: Provide public spaces with views onto the Bay and Corte Madera Creek.
 - Action Program [10]: Apply conditions of project approval that will preserve or open up views of the Bay and Corte Madera Creek.

Implementation of the Station Area Plan would increase development within the Plan area which could have the potential to impacts views to the Bay as well as to Corte Madera Creek. As noted in Action Program [10] listed above, as specific projects are proposed within the Plan area, the City will review site plan designs and address potential impacts to views within the area.

Additionally, the Urban Design Guidelines included in the Station Area Plan will include several measures to address the visual aspects of proposed development within the Plan area. These guidelines would include:

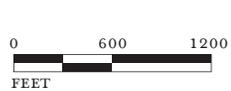
- Design buildings to conform to the height zones shown in Figure 6.4 of the Station Area Plan (identified as Figure VI-1 in this Draft EIR).
- Scale buildings to assure maximum daylight into public open space areas.
- Design buildings to avoid significantly blocking views to the bay, Mount Tamalpais, or other surrounding hillsides from public gathering places, parks, or event spaces.
- Break up building massing to ensure views from public spaces to the Bay and to Mount Tamalpais.
- Design the plaza to provide views across Sir Francis Drake Boulevard to the waterfront as well as long views to the surrounding hillsides and larger Bay.
- Highlight views to the water and be careful not to block views with tall trees or other site elements.

As noted in the Station Area Plan, appropriate building heights depend on the building and geographical context in which new development may occur. Future development in the Larkspur Landing Circle should continue the existing development pattern, with taller buildings adjacent to higher sites and lower buildings encourage closer to Sir Francis Drake Boulevard.



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FIGURE VI-1



City of Larkspur SMART Station Area Plan EIR
Urban Design Guidelines
Allowable Building Heights

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At the Ferry Terminal site, building heights and development associated with implementation of the Station Area Plan should be sensitive to maintaining views to the water, with taller buildings adjacent to the Wood Island hillside. Buildings located along the waterfront edges should not exceed two floors in height at their waterfront edge, but additional stepped back floors may be incorporated.

At Drakes Landing, taller buildings may be appropriate against the large-scaled intersection structure to the east. Additionally, the residences in the Greenbrae Hills neighborhood to the north and on Drake View Circle are located at higher elevations, so their views would not be impacted. This area could accommodate taller buildings, provided that the visual and physical connection to the water remains possible.

As shown in Figure VI-1, as part of implementation of the Station Area Plan, building heights east of US 101 will be allowed to range from two to five stories. Buildings should step down in height from the higher elevations towards the Bay, with portions of the buildings immediately adjoining the Bay not exceeding two floors in height. On sites with significant topography variances, taller buildings could be situated against the hillside to minimize impacts to views through the site.

As specific developments are proposed within the Plan area, the City would provide environmental review of projects, and would ensure that applicable programs and the Urban Design Guidelines from the General Plan and the Station Area Plan are implemented. The potential impact related to visual resources would be considered less than significant.

B. GROWTH INDUCING IMPACTS

This section summarizes the project's growth-inducing impacts on the surrounding community. According to CEQA, a project is typically considered growth-inducing if it would foster economic or population growth. Examples of projects likely to have significant growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or industrial parks in areas that are currently only sparsely developed or are undeveloped.

ABAG and MTC developed and adopted Plan Bay Area in July 2013 to address the expected population and employment growth in the region, as ABAG expects that the population of the Bay Area region will grow from 7,341,700 residents in 2010 to 8,719,300 residents in 2030. During that period, the number of employed residents is expected to grow from 3,410,300 to 4,547,100. Plan Bay Area provides a strategy for meeting 80 percent of the region's future housing needs in PDAs, which are neighborhoods within walking distance of frequent transit service, offering a wide variety of housing options, and featuring amenities such as grocery stores, community centers, and restaurants. Due to the concentration of existing and proposed transit (e.g., ferry terminal, Marin Airpporter, SMART Station), multi-modal transportation features (e.g., bike and pedestrian pathways), and opportunity sites for new housing and services, the Plan area qualified for and received a Station Area planning grant. The housing growth projections in the Station Area Plan are therefore consistent with the current regional plan objectives for growth.

Implementation of the Station Area Plan would directly induce population and employment growth in the City for the purpose of supporting transit by designating land within the Plan area for more intense development than current designations allow. As discussed previously in this chapter,

implementation of the Station Area Plan could result in the development of 558 additional jobs and 920 additional housing units by 2035. The anticipated number of employees, households, and residents exceeds ABAG's 2009 projection for 2035.⁶

The population and employment growth that would occur as a result of development associated with the Station Area Plan would occur entirely within Larkspur's City limits. Because this growth would support and be near a transit node, growth planned for under the Station Area Plan would have several beneficial effects. First, such growth would support regional transit systems by increasing ridership and access to the SMART train and the ferry and would benefit bicycle and pedestrian access. Strengthening the transit system and improving bicycle and pedestrian circulation would reduce traffic and associated environmental effects, such as air pollution and greenhouse gas emissions, within the Bay Area. Second, development associated with the Station Area Plan would increase the construction of housing in Larkspur, assisting the City in addressing its fair-share housing allocation requirements. An increased overall housing supply would allow the City to better address affordable housing needs. Lastly, the population density within Larkspur would increase, allowing more people to live within the current City boundaries. The development of dense residential and mixed-use districts in close proximity to transit nodes represents an environmentally-sound method for accommodating a growing population and reducing sprawl, resulting in beneficial effects on both local and regional levels.

C. UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL IMPACTS

Implementation of the Station Area Plan would result in the following significant unavoidable impacts:

- Implementation of the Station Area Plan would result in the addition of project traffic that would increase the average delay during the AM and PM peak hours by more than 5 seconds at Intersection #8 Sir Francis Drake Boulevard/Andersen Drive, which would operate at unacceptable LOS under Existing Plus Project Conditions and Cumulative Plus Project Conditions.
- Implementation of the Station Area Plan would add traffic greater than 1 percent of the freeway segment capacity on the two segments of northbound U.S. 101 between Tamalpais Drive and Industrial Way, resulting in a significant project contribution under Cumulative Conditions.
- Implementation of the Station Area Plan could generate air pollutant emissions that would exceed the BAAQMD criteria and could substantially contribute to a violation of air quality standards.
- Implementation of the Station Area Plan could result in a significant cumulative net increase in criteria pollutant emissions.
- Implementation of the Station Area Plan could result in GHG emissions that would have a significant impact and cumulatively contribute to global climate change.

⁶ Association of Bay Area Governments (ABAG), 2009.

D. SIGNIFICANT IRREVERSIBLE CHANGES

An EIR must identify any significant irreversible environmental changes that could result from implementation of a proposed project. These may include current or future uses of non-renewable resources and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA dictates that irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. The CEQA Guidelines describe three distinct categories of significant irreversible changes: 1) changes in land use that would commit future generations; 2) irreversible changes from environmental actions; and 3) consumption of non-renewable resources.

1. Changes in Land Use Which Commit Future Generations

Although the Plan area is largely developed, implementation of the Station Area Plan would result in the intensification of residential, commercial, retail and hotel uses in an already urbanized area. This development would commit the City to intensification of uses in the Plan area. The intensification of development in the Plan area would serve several purposes, including: 1) provision of housing; 2) creation of a transit-oriented neighborhood; 3) utilization of underutilized land; and 4) efficient use of existing roadways and infrastructure within Larkspur. Development would be limited to lands within the City limits. Although development associated with the Station Area Plan would commit future generations to more intense development, the new development would benefit the City and the region by providing needed housing, jobs, and transit-oriented development within an existing urban area. Development associated with the Plan area would not commit future generations to a development pattern that is often described as “urban sprawl.” The development of dense residential and mixed-uses in close proximity to transit represents an environmentally-sound method for accommodating a growing population and reducing sprawl.

2. Irreversible Damage from Environmental Accidents

Implementation of the Station Area Plan would result in the development of underutilized land. Irreversible environmental changes associated with the modification of existing land uses include: the potential degradation of existing biological and cultural features, loss of aesthetic integrity, and the installation of utility and roadway infrastructure. Although it is unlikely that a major hazardous waste release would occur in Larkspur as a result of implementation of the Station Area Plan, such a release would also constitute a significant irreversible change from an environmental action. The mitigation measures outlined in Chapter IV, Setting, Impacts, and Mitigation Measures, of this Draft EIR would reduce all such irreversible or nearly irreversible effects to less-than-significant levels.

3. Consumption of Nonrenewable Resources

Consumption of nonrenewable resources includes conversion of agricultural lands, loss of access to mining reserves, and non-renewable energy use. As discussed within this section, there are no active agricultural uses in the Plan area. As discussed in Section IV.G, Geology, Soils, and Seismicity, although the northeastern portion of the Plan area was used for aggregate mining prior to 1948, no part of the Plan area is designated as a mineral resource site under the State Mining and Reclamation Act of 1975 (SMARA). Additionally, there are no natural gas, oil, or geothermal resources identified

as being located in or adjacent to the Plan area.^{7,8} Finally, the development of dense residential and mixed-use development in close proximity to transit would de-emphasize private automobile use and encourage transit ridership, and would result in the conservation of fossil fuels. Therefore, the implementation of the Station Area Plan would result in the efficient use of non-renewable energy sources.

⁷ California Department of Conservation, 2000. *Energy Map of California, Map S-2*, 3rd Edition.

⁸ California Department of Conservation, 2001. *Oil, Gas, and Geothermal Fields in California, Map S-1*.