

February 15, 2013

Neal Toft  
Director of Planning and Building  
City of Larkspur  
400 Magnolia Avenue  
Larkspur CA 94939



**Re: Scoping Comments for the Larkspur SMART Station Area Plan**

Dear Mr. Toft:

We are assuming that all of the concerns conveyed by members of the Citizens Advisory Committee and summarized in the Plan will be evaluated in the DEIR. If they are not already being included in the scoping comments, we ask that they be analyzed in the DEIR that is being prepared for the Larkspur SMART Station Area Plan. The Plan has the potential for substantial environmental impacts that need to be carefully analyzed and considered.

**SEA LEVEL RISE**

Some of the development contemplated by the Plan is located in areas that will be subject to sea level rise associated with global warming. The DEIR should fully address the impacts of sea level rise over the decades long life of any projects, and should bar development and/or impose mitigation measures to deal with it.

**BIOLOGICAL RESOURCES**

The area south of the ferry terminal, particularly the Heerdt Marsh, which is part of the Corte Madera Ecological Reserve and home to the endangered Clapper Rail, is an environmentally sensitive area that is likely to suffer adverse impacts if the proposed high-density development plan is implemented. The nature and extent of these impacts needs to be analyzed and mitigation measures should be included in the DEIR.

**TRANSPORTATION AND CIRCULATION (1)**

The proposed high-density development will certainly contribute to congestion on Sir Francis Drake, which will add to greenhouse gas emissions and adversely impact air quality. The DEIR needs to fully analyze these impacts and go beyond suggesting that it will be necessary for major improvements and capacity increases to be made to Sir Francis Drake Boulevard in order to accommodate the development proposed in the Plan. The plan should state specifically that any density increase in the area shall be conditional on at least maintaining the LOS on Sir Francis Drake(SFD) and the EIR should reflect that approach. As the LOS is currently at F in this area during peak hours, the DEIR should preferably stipulate a mitigation requirement that improvements to SFD must be in place prior to any increases in density in the area, so as to bring the LOS to an acceptable level. Likewise, the Plan assumes the construction of a SMART station, but it is not clear when or even if such a station will be built. Implementation of the plan should be contingent the confirmed presence of a SMART station, and if not, then the DEIR should analyze

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the impacts of the Plan if the station is not built and all of the new residents, instead, are limited to presently available transportation systems.

### **TRANSPORTATION AND CIRCULATION (2)**

Although the project areas designated for both the Larkspur SMART Station Area Plan and the Highway 101 Greenbrae/Twin Cities Corridor Improvement Plan proposed by the Transportation Authority of Marin are overlapping, there is barely any acknowledgment of that fact by either sponsoring entity in their own project's documentation. What are the impacts of TAM's proposed plan for a massive highway construction project within the same project area? What impacts will it have on the Larkspur SMART Station Area Plan? What impacts will Plan implementation have on 101 traffic? Does highway 101 have capacity to accommodate the large increase in population in an already congested freeway corridor? Again, the answers to these questions address the possibility that a SMART station will not be built.

### **TRANSPORTATION AND CIRCULATION (3)**

Despite uncertainties about whether the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement Project will ever be constructed, removal of the pedestrian-bicycle highway overpass between Lucky Drive and Industrial Way would have a significant impact on pedestrian and bicycle circulation routes in the Plan area. What are the ramifications of the overpass removal on the Plan's anticipated benefits of multi-modal options for pedestrians and bicyclists?

### **TRANSPORTATION AND CIRCULATION (4)**

As there are no similarly situated, comparable, transit-oriented developments of this scale in the Bay Area, the DEIR should provide reliable data that documents the assumption that a combination of bicycle, transit, and ferry options available will actually result in a significantly demonstrable decrease in the residents' use of automobiles. The DEIR should provide data demonstrating that (1) most residents of the 948 new housing units will work in the City and take the ferry to work each day, (2) that bus service will be available to take them to wherever else in the County they work, shop, go to school, socialize, exercise, and/or play sports, (3) that many jobs in the immediate Plan area will be held by residents of the immediate Plan area, who will walk or bicycle to work. Will the plan include any controls that insure that residents rely on public transit, biking or walking?

### **TRANSPORTATION AND CIRCULATION (5)**

It is obvious that the large number of new residents will not use public transit/biking/walking 100% of the time, and, therefore, there will be some increase in vehicular traffic. What is the expected increase in vehicular traffic and what are the impacts? The DEIR should provide reliable, relevant data to show that the net increase in vehicle miles traveled (VMT) as a result of this high-density project would not have a demonstrable adverse impact on air quality and greenhouse gas emissions.

### **TRANSPORTATION AND CIRCULATION (6)**

A high-density development of this scale involves parking issues that should be fully examined in the DEIR, with mitigations proposed. Will it be necessary to construct a double-deck parking

structure at the ferry terminal parking lot? Will it be necessary to create a parking district that would construct parking in other parts of the development? Is there some other means of providing sufficient parking? The preferred alternative should include recommendations for resolving the parking problem as part of the DEIR.

#### **TRANSPORTATION AND CIRCULATION (7)**

The issue of transit scattering versus a transit hub warrants examination in the DEIR, as many concerns have been expressed about the SMART station being located so far from the ferry terminal. Although the proposed extension of SMART has no funding and is not included in the current phase of SMART construction, the feasibility of relocating the station should be examined in the DEIR as part of the preferred alternative.

#### **TRANSPORTATION AND CIRCULATION (8)**

An older demographic will likely require some sort of shuttle service to meet the needs of residents who require services not available in the immediate area and are unable to reach such services by walking or bicycling. Is it feasible to require a shuttle service as part of a development plan? What are the costs such a service and where will the funding come from? If private developers are required to provide this service, what measures will be imposed to insure compliance?

#### **TRANSPORTATION AND CIRCULATION (9)**

The Plan correctly assumes that older people don't drive as much, but they do require most support and care workers who will need parking close to residences. Also, older retired people who can still drive are more likely to make multiple mid-day trips. How is this being addressed in the Plan?

#### **TRANSPORTATION AND CIRCULATION (10)**

If new residents are expected to use the Larkspur Ferry, what will be the impact of the Plan on ferry service, which is currently operating at or near capacity during commute hours? Will it be necessary to add new ferries to provide added capacity? If so, what will it cost, and is there funding available?

#### **HYDROLOGY/DRAINAGE**

Although the proposed areas for development all appear to be above elevations that currently flood, all access roads in the Plan area are shown to be below the level of 100-year floods, which seem to occur every few years, even without considering sea-level rise. It is now generally recognized that one result of global warming is to produce storm events of greater intensity and severity. How often will access to newly developed areas be impeded due to flooding? The DEIR should explain how to mitigate the lack of ingress and egress for residents and workers, as well as its impact on the ability of police, firefighters, and paramedics to respond in case of medical emergencies and disasters of various kinds that occur when access is unavailable due to flooding.

**LAND USE CONSISTENCY AND COMPATIBILITY (1)**

The project description needs to provide the community with a better understanding of what the project actually includes, and what kinds of mitigation measures are being proposed. Because it is being made an integral part of the Larkspur General Plan Update we understand that no additional DEIR will be required at the time one or more developers come forward to implement the approved plan. Therefore, it is very important to describe and analyze each component of the Plan in the DEIR so that appropriate mitigations can be required at this time, before the Plan is approved.

**LAND USE CONSISTENCY AND COMPATIBILITY (2)**

The Plan indicates that housing in the Plan area will likely be affordable only to households earning less than 120 percent of AMI, and that Federal, state, and local financing sources will be needed to develop housing that is affordable to households with lower incomes. It goes on to state that the gap between subsidies provided by low-income housing tax credits, bond financing, and other typical sources and construction costs will probably be in excess of \$100,000 per unit. That gap would have to be filled by local financing sources, housing trust funds (which are not currently available) and in-lieu fees. The Plan states that the Local Housing Subsidy needed would range between \$41,972,519 and \$57,448,800. The DEIR should explain how this deficit, which would likely make implementation of the proposed Plan impossible, would be mitigated. Where will these funds come from and is it realistic to assume that such funding will be available? What will happen if no funding is available?

**LAND USE CONSISTENCY AND COMPATIBILITY (3)**

The growth projections indicated in various parts of the Plan are based on the Bay Area Jobs-Housing Connection Strategy estimates issued in May 2012 by ABAG and MTC that are inconsistent with the recent projections published by the California Department of Finance, which state that growth in Marin County will be essentially stagnant between now and 2050. That should be taken into account in evaluating the alternatives studied in the DEIR, particularly regarding the market for retail and employment in the area.

**LAND USE CONSISTENCY AND COMPATIBILITY (4)**

Neighborhood-supporting retail is a significant need in an area separated from the rest of the community by a major freeway, and the DEIR should examine the economic viability of locating businesses such as a grocery store there. The Larkspur "Country Mart" has attempted, without success, to provide grocery services. Is it realistic to assume that groceries and other day-to-day retail services will be provided? What level of population is needed to support these services? If they are not provided, will residents use automobiles to travel for basic necessities?

**LAND USE CONSISTENCY AND COMPATIBILITY (5)**

In an area where high-density development is so tightly focused on use of multi-modal transit such as the ferry terminal, the ramifications of liquefaction in event of a major earthquake should be studied and discussed in the DEIR.

**PUBLIC SERVICES (1)**

The Marin Municipal Water District has a longstanding deficit in its ability to provide all of the water needed within its jurisdiction on a long-term basis that is likely to include drought years. The DEIR should explain the how the proposed high-density development would obtain the water it requires without impacting existing water users.

**PUBLIC SERVICES (2)**

As the majority of housing units in the Plan area lie within the San Rafael School District, the DEIR should discuss the impacts of transporting students to elementary, middle, and high school locations that are a considerable distance from the Plan area. How will students get to and from schools? Will public transit, such as school buses, be provided? If so, what will it cost and how will it be funded? If not, how many students will be driven to and from school, and what will be the impacts of the additional traffic?

**COMMUNITY COHESIVENESS**

Geographic isolation of the Larkspur Landing area from other parts of the Larkspur community is a factor that should be evaluated, with mitigation and adaptation strategies identified in the DEIR.

Respectfully submitted,



Susan Stompe, President  
Marin Conservation League