



October 21, 2024

Transportation Authority of Marin  
900 Fifth Ave #100  
San Rafael, CA 94901

RE: Oct. 24, 2024 TAM Board Meeting Agenda Item No. 10

Dear Transportation Authority of Marin,

This letter contains WTB-TAM's recommendations for the Transportation Authority of Marin's EIR Scoping comments to be submitted to the Golden Gate Bridge, Highway, and Transportation District on its Larkspur Ferry Service and Parking Expansion Project. Please note that EIR Scoping comments are due on October 31, 2024. Individual TAM Commissioners may also borrow from the recommendations in this letter for their own individual comments submitted as part of the EIR Scoping process.

Our recommendations are divided into two groups: **PART ONE** and **PART TWO**. The first group, **PART ONE**, consists of environmental impacts and negative externalities which should be studied and analyzed as part of the project EIR. These include traffic, cost, environmental, safety, aesthetic, and land use inefficiency.

The second group, **PART TWO**, consists of different multi-modal improvements that should be included in a "No Build + Multi-Modal Improvements Alternative" in the project EIR. This alternative would be in addition to the alternatives covering the various parking structure configurations as well as in addition to (and separate from) the required "No Build" alternative which simply maintains the status quo. The multi-modal improvements to be included in this alternative in the EIR include parking demand management, SMART, buses, multi-use pathways, bike parking, bikeshare, bike lease, and transit-oriented land use.

Let us be clear that we are strong supporters of the Larkspur Ferry and of public transportation in general. We are glad that the District is forecasting increased ferry ridership in the future. More people on ferries instead of on our roads and highways is good for Marin County and good for the Bay Area. However, we have significant reservations with the District's models which assume that most of the forecast increase in ridership translates to an increase in demand for parking at the ferry terminal. We believe those models fail to account both for recent and planned and future improvements in multi-modal access to the Larkspur Ferry Terminal.

Let us also be clear that we are not "anti-car" or "anti-parking." We know that a majority of Larkspur Ferry riders currently access the ferry terminal by car, and that parking is an important component of the ferry's accessibility to the general population. We understand that some ferry riders rely on parking for various reasons such as age, comfort, distance, and trip-chaining needs and that some would choose other modes besides the ferry if that parking were not available. We acknowledge that a certain amount of parking will always be necessary to



accommodate those riders who are unable or unwilling to shift their home-to-ferry terminal commute to modes other than driving. That said, we believe that through a mix of parking demand management strategies and incentives, and encouragement of alternative modes for accessing the ferry terminal, the District can accommodate the forecast increase in ferry ridership without building any new expensive, controversial, and environmentally problematic parking structures.

## PART ONE: IMPACTS TO BE STUDIED IN THE EIR

The following are environmental impacts and negative externalities that should be studied and analyzed in the project EIR.

### Traffic

The Larkspur Ferry Terminal is at the epicenter of one of the worst perennial traffic jams in Marin County. Everyone in Marin is familiar with the gridlock that occurs daily on the access routes leading to the ferry: Sir Francis Drake Boulevard, and northbound Highway 101 before the Sir Francis Drake exit. Adding additional parking capacity at the ferry will generate additional car trips on local roads and intersections, exacerbating the current traffic problem. Reducing vehicle trips and vehicle miles traveled should be the goal, but the proposed parking garage will do the opposite. This negative externality is best understood through concept of "induced demand. By adding capacity that does not currently exist, the proposed garage structures will create new car trips where there was no demand for them before. It will encourage people to drive who otherwise might have considered other modes. This is the opposite of what the District should be doing: dampening demand for parking by making it easier to reach the ferry by means other than driving.

### Cost

Although the District's consultants have not yet performed detailed cost estimates of the different parking structure alternatives, it is safe to say that none of them will come cheap. The national average cost per parking space in multi-story parking structures is \$40,000 to \$60,000. With constructions costs higher than the national average in California, and higher than the state average in Marin County, the cost would surely be near or at the upper end of that range. More importantly, the cost of designing, permitting, and constructing the parking structure carries a tremendous opportunity cost. It represents funds that could be invested more efficiently on other improvements, such as new ferries, improved bus service, or other first-mile solutions as detailed in the second half of this letter.

### Environment

The Larkspur Ferry is one of the most energy-efficient modes of transportation between Marin and San Francisco. Ferry vessels traveling on the Bay save energy through reduced friction with the water surface versus tires on asphalt. A single ferry vessel holds more people than any car or bus. And the ferry takes the shortest, most direct route between Larkspur and the City. Having left their cars behind in Larkspur, ferry riders are already relying on alternative modes of



transportation for their “last mile” needs to reach their final destinations in San Francisco after disembarking at the Ferry Building. Asking some of those riders to consider alternative modes for their “first mile” needs between their homes and the Larkspur Ferry Terminal is not that big of a reach. More parking capacity means more car trips. Beside more traffic, more car trips also means more vehicle miles traveled, more greenhouse gas emissions. Even with electric vehicle adoption, more car trips still means more energy expended. Finally, on the physical infrastructure side, the concrete and steel materials needed for the proposed parking structures carry a significant environmental footprint and will increase the urban heat island effect.

### **Safety**

Increased car traffic is directly correlated with worsened safety outcomes for all users of the transportation network. More parking capacity means more car trips to and from the Larkspur Ferry Terminal. With more car trips and especially more cross-movements at intersections comes increased risk of collisions, injuries, and fatalities. The risk is greatest for pedestrians and bicyclists, who are the most vulnerable users of the transportation network. But the risk also extends to motor vehicle drivers and passengers as well. In the 2024 [\*Marin County Local Road Safety Plan\*](#), the Transportation Authority of Marin identified East Sir Francis Drake Boulevard between Larkspur Landing Circle West and Larkspur Landing Circle East as part of the City of Larkspur’s High Collision Network due to the high rate of collisions on this road segment. The intersection of East Sir Francis Drake Boulevard and Larkspur Landing Circle West, which is also the intersection at the entrance to the Larkspur Ferry Terminal, was also identified as part of the High Collision Network.

### **Aesthetic**

Parking structures are amongst the least aesthetic buildings in the built environment. The visual impact of the proposed parking structures on the main lot would be especially visceral given the ferry terminal’s idyllic waterfront location. The parking structures would block existing view corridors towards the San Francisco Bay. They would also block views of the iconic ferry structure designed by internationally acclaimed architect Jacques de Brer. The proposed parking structure on the auxiliary lot would be even taller due to that site’s smaller buildable footprint. It would block views from the SMART Larkspur station towards the ferry terminal and the Bay, severing the visual connection between the two modes of transit.

### **Land Use Inefficiency**

Parking is one of the most inefficient uses of land in the urban built environment. The District has in its possession a valuable asset in the form of land on which the proposed parking structures would be built. This land, currently used for parking, is prime waterfront land. It lies within the City of Larkspur’s targeted area for high-density housing development, and is in a Transit-Oriented Community as defined by the Metropolitan Transportation Commission. Its most productive use would be as housing or mixed-used development, which would generate additional revenue for the District as well as supply a steady source of ferry riders who do not require parking. It is in the District’s interest to maximize the efficiency of land use on its land holdings. This includes seeking ways to reduce parking demand at the Larkspur Ferry Terminal so that more land can be used for more productive uses. If the District builds the proposed



parking structure, it will likely remain there indefinitely due to sunken costs. This means that it will be more difficult for the District to respond to future changes in transportation behavior and reductions in demand for parking. It will also make it more difficult for the District to pivot to using the existing parking lot for future uses such as housing as called for in Initiative #18 in its Draft Strategic Plan.

## PART TWO: “MULTI-MODAL IMPROVEMENTS” ALTERNATIVE

The following are multi-modal improvements that should be included in a “No Build (Parking Structure) + Multi-Modal Improvements Alternative” in the project EIR. This alternative would be in addition to the alternatives covering the various parking structure configurations as well as in addition to (and separate from) the required “No Build” status-quo alternative.

### Parking Demand Management

The District should implement a parking demand management program to reduce the demand for parking at the Larkspur Ferry Terminal and encourage ferry riders to choose alternative modes to travel between their homes and the ferry terminal. Such a program would make use of both positive and negative incentives. Positive incentives might be discounted ferry tickets for ferry riders who travel to the ferry terminal by carpool, transit, or active transportation. Negative incentives might be higher parking fees, parking fees on weekends, or dynamic parking fees that respond to fluctuating demand. We can look to successful examples of both positive and negative incentives elsewhere in the Bay Area’s transportation system. Discounted tolls on the Golden Gate Bridge and seven BATA bridges are an example of positive incentives, and dynamic, demand-responsive parking meter fees in San Francisco are an example of negative incentives.

### SMART

In December 2019, SMART began service to Larkspur. One month later, the Covid-19 pandemic began spreading across the Bay Area, and Larkspur Ferry ridership has not returned to pre-Covid levels since. This means that for the entire duration of time when the parking lot was regularly filled to capacity, there was no train to Larkspur. SMART is a newcomer in Marin’s transportation landscape. Lately, its ridership has fully recovered to, and surpassed, pre-Covid levels, with ridership breaking records every week. Surveys show the Larkspur Ferry Terminal is the number one destination for SMART riders. SMART is a new modal alternative for ferry riders to reach the Larkspur Ferry Terminal, and one that will only improve as more people learn about it. In its 2024 Strategic Plan, SMART identified first-and-last-mile connections as the number one strategy to increase ridership and an area for continued investment and optimization. One example, launched in June 2024, is the SMART Connect shuttle, which provides a quick and convenient option for ferry riders making the transfer from the train station who prefer not to walk or for whom physical limitations make walking difficult. We suspect that the District’s forecasts are not adequately taking into the account the role that SMART plays — and will play in the future — in reducing demand for parking and getting people to the ferry.



### **Buses**

The Larkspur Ferry Terminal is currently served by a limited number of bus routes: Marin Transit Routes 17, 29, and 228 and Golden Gate Transit Route 132. Most of these routes operate infrequently and are not practical as a modal alternative for most Larkspur ferry riders. Golden Gate Transit's more frequent express bus service, Routes 130 and 150, do not stop near the Larkspur Ferry Terminal. Adding a stop on these routes closer to the ferry could leverage existing transit service and increase access to the Ferry Terminal. Restoration of the former ferry feeder bus routes (see **Appendix Exhibit A**) could also reduce parking demand and meet ferry riders' first-and-last-mile needs. We understand that the District did temporarily restore the feeder bus routes in 2008, and that the usage was disappointing. However, with enhanced outreach and marketing and with more optimization of the feeder routes, we think that feeder bus routes could be successful again. Improving ferry access with both SMART and bus routes is in alignment with Initiative #16 of the District's Draft Strategic Plan.

### **Multi-Use Pathway Network**

The Larkspur Ferry Terminal is more connected via active transportation routes than ever before. Several of the pathways that today lead directly to the Larkspur Ferry Terminal were not even completed prior to the Covid-19 pandemic when the parking lots were last regularly filled to capacity. As with the role of SMART, we suspect that the District's forecasts for ferry access by modal share are not adequately taking into account the role that pathways can play in bringing ferry riders to the ferry terminal and reducing demand for parking. The ferry terminal lies at the confluence of a system of pathways known that radiate out in all four cardinal directions: the SMART Pathway to the north, the East Sir Francis Drake Boulevard Pathway to the east, the North – South Greenway to the south, and the Corte Madera Creek Pathway to the west. The Transportation Authority of Marin and SMART have both invested millions of dollars in building the Central Marin Ferry Connection Project, an award-winning system of grade-separated overcrossings and tunnels that provide pedestrians and bicyclists with a safe, separated, and near-flat pathway connection to the ferry that avoids busy arterial traffic and bridges geographical barriers such as Corte Madera Creek and Cal Park Hill (see **Appendix Exhibit B**).

With the completion of the Andersen Drive to Second Street segment of the SMART Pathway and the Marquard Avenue to Shaver Street segment of the Cross – Marin Bikeway, all of Central San Rafael is now easily accessible to the ferry via the Cal Park Hill Tunnel. Further planned projects for safe and separated bicycle routes on Bellam Boulevard and through Downtown San Rafael will further increase access to the ferry for the largest city in Marin County, and the number one point of origin for ferry riders. The City of Larkspur and Town of Corte Madera are also well-connected to the ferry with a network of existing pathways, and the planned gap closure of the Southern Segment of the North – South Greenway Gap Closure Project will complete the all-ages-and-abilities connection to the ferry from the south. Additional planned pathway improvements will make it possible for ferry riders from across central and southern



Marin to reach the ferry. With the growth of the e-bike market, the distance that people can travel efficiently and comfortably by bicycle is getting longer and longer. This means that more people and neighborhoods are within practical and convenient bicycling distance of the ferry, and that bicycle mode share should increase well beyond the 7.3% measured prior to the Covid pandemic.

### **Bike Parking**

Increased bicycle trips to the ferry terminal must be accommodated through improved bike parking. This is stated as much in Initiative #4 of the District's Draft Strategic Plan. Most of the increase in bicycle mode share to the Larkspur Ferry Terminal will come from riders who do not need a bike once they reach San Francisco because they work within walking distance of the Ferry Building. This means they will need more space to park their bikes on the Larkspur side. We understand that that one of the planned improvements in the Ferry Expansion Project is to replace the bike racks outside the Ferry Terminal with bike lockers. This is fine, but not the only solution. Bike lockers are space-intensive, and because they require pre-registration or membership, the barriers to use are significant. We recommend increasing the amount of traditional non-locker bike parking within the paid area of the Ferry Terminal, as this bike parking is largely secure within the monitored paid area perimeter. Images of proposed new bike parking infrastructure shown at the May 14<sup>th</sup> Open House showed vertical bike parking racks. While space-efficient and suitable for traditional bikes, these racks are not suitable for e-bikes, which are heavier than traditional bikes and difficult to lift.

### **Bikeshare**

The Transportation Authority of Marin, through the third-party contractor Drop Mobility, recently launched a Countywide bikeshare system known as Redwood Bike Share. Shared e-bikes are now deployed at bikeshare hubs located at and in the vicinity of transit centers throughout the County, including all SMART stations and all Golden Gate ferry terminals. However, the scale of Redwood Bikeshare is limited, with just a handful of bikes based at the Larkspur Ferry Terminal hub, and even fewer in the surrounding neighborhoods. A robust bikeshare system is an essential component of the multi-modal equation that will bring people to the ferry terminal without increased demand for car parking. In order to fully leverage the power of bikeshare, the District must either partner with TAM/Drop to expand the scale of Redwood Bikeshare system at and around the Larkspur Ferry Terminal, or the District must supplement the Redwood Bikeshare system with a bikeshare system of its own. The ferry needs a fleet of shared bikes much larger than a dozen bikes. Most importantly, bikeshare hubs must be numerous and well-positioned throughout the neighborhoods and activity centers within a 5-mile radius of the ferry terminal, where ferry riders live and work. This District-branded supplemental bikeshare system will require capital and operational funding, but the cost is merely a fraction of what the District is contemplating spending on the proposed parking structures. The cost savings from each parking space that the District does not need to build is enough to fund a fleet of bikeshare bikes.

### **Bike Lease**

Another model similar to bikeshare is "bike lease." Bike lease is currently the fastest-growing



segment of the bicycle market in Europe. In one possible business model, the District would contract with a bikeshare operator to implement and maintain a fleet of e-bikes that would be leased on a one-to-one basis to individual ferry riders. These bikes would be used for the specific purpose of commuting from the rider's home in Marin County to the ferry terminal. The bikes would be leased to the ferry riders for free, provided they use them to ride to the Larkspur Ferry Terminal a set minimum number of times per week. We think three times a week is a good place to start, but this could be adjusted according to evolving commuting trends. Users of this program could be incentivized with a discount on their ferry ticket. They would not be allowed to take the bike onboard the ferry. There would be designated parking and charging stations for the leased e-bikes within the secure perimeter of the ferry terminal. This is where charging of the bikes would occur, as well as most maintenance of the bikes by the third-party contractor.

### Transit-Oriented Land Use

Land use planning is one of the most powerful tools available to the District to increase ridership of its ferries without increasing demand for parking. The Larkspur Ferry Terminal parking lots are prime land for transit-oriented development. This is stated as much in Initiative #18 of the District's Draft Strategic Plan. It is also emphasized in the SMART Larkspur Station Area Plan, and in the Housing Element of the Larkspur General Plan, which specifically designates the District-owned parking lot on Larkspur Landing Circle as one of Larkspur's "Housing Opportunity Sites" to be developed to meet the City's state-mandated housing targets. The value proposition of housing on the District's ferry terminal land far exceeds the value proposition of the proposed parking structures. By developing the land that it owns with housing or mixed-use development, the District would both generate profits from the development itself, and increased ticket revenues from new ferry riders who would have no need for the proposed parking structures because they would live within walking distance of the ferry. The District could also take advantage of future trends in "reverse commuting" by building mixed-use and office space on its ferry terminal properties that would attract ferry riders who live in San Francisco but work in Marin. This would help balance out ridership amongst ferry trips, putting more people in Larkspur-bound ferries during the morning commute, and San Francisco-bound ferries during the afternoon commute.

Respectfully submitted,

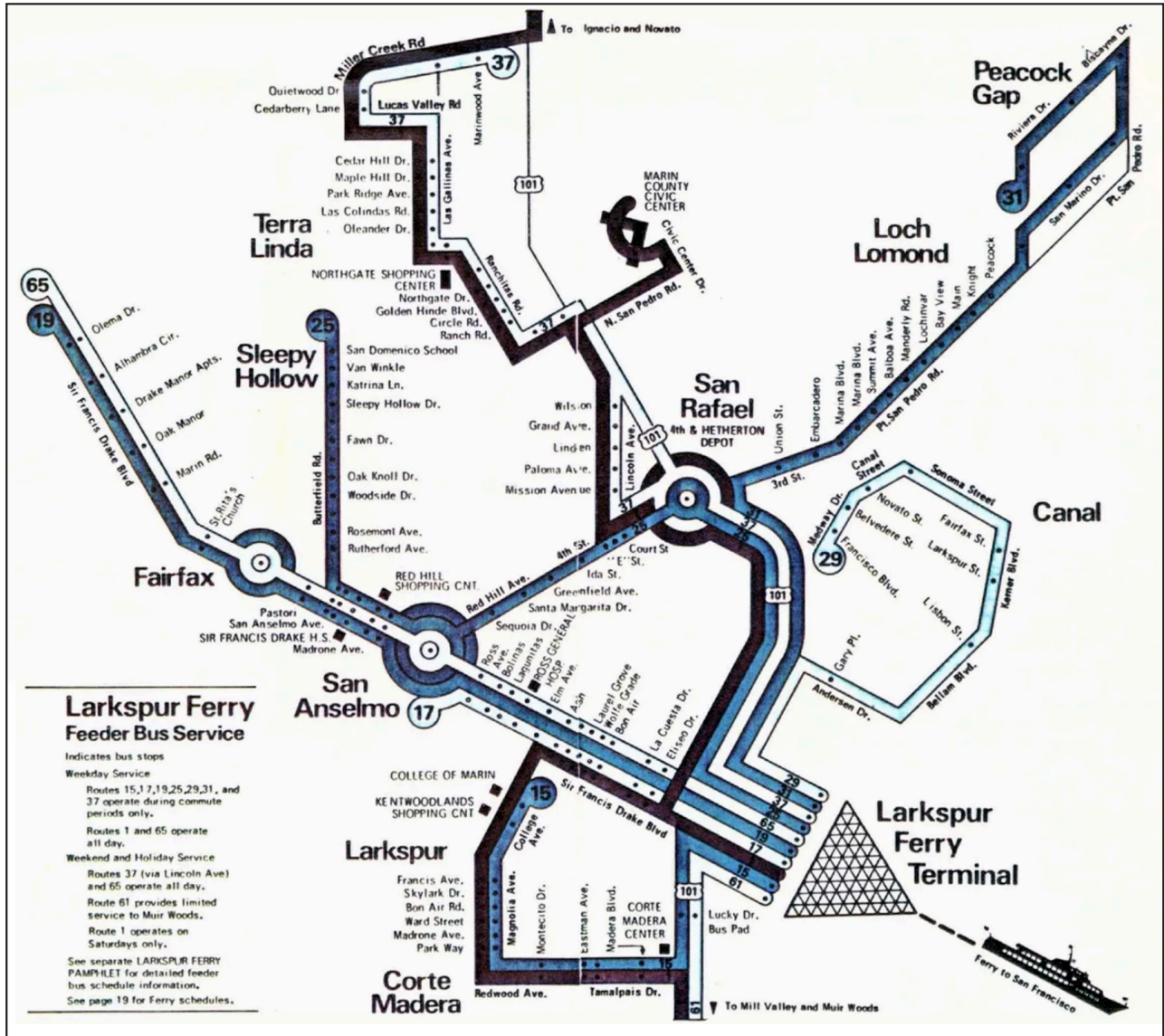
WTB-TAM President Patrick Seidler

WTB-TAM Director of Planning Matthew Hartzell



Appendix Exhibit A

Larkspur Ferry Feeder Bus Service Map, 1977

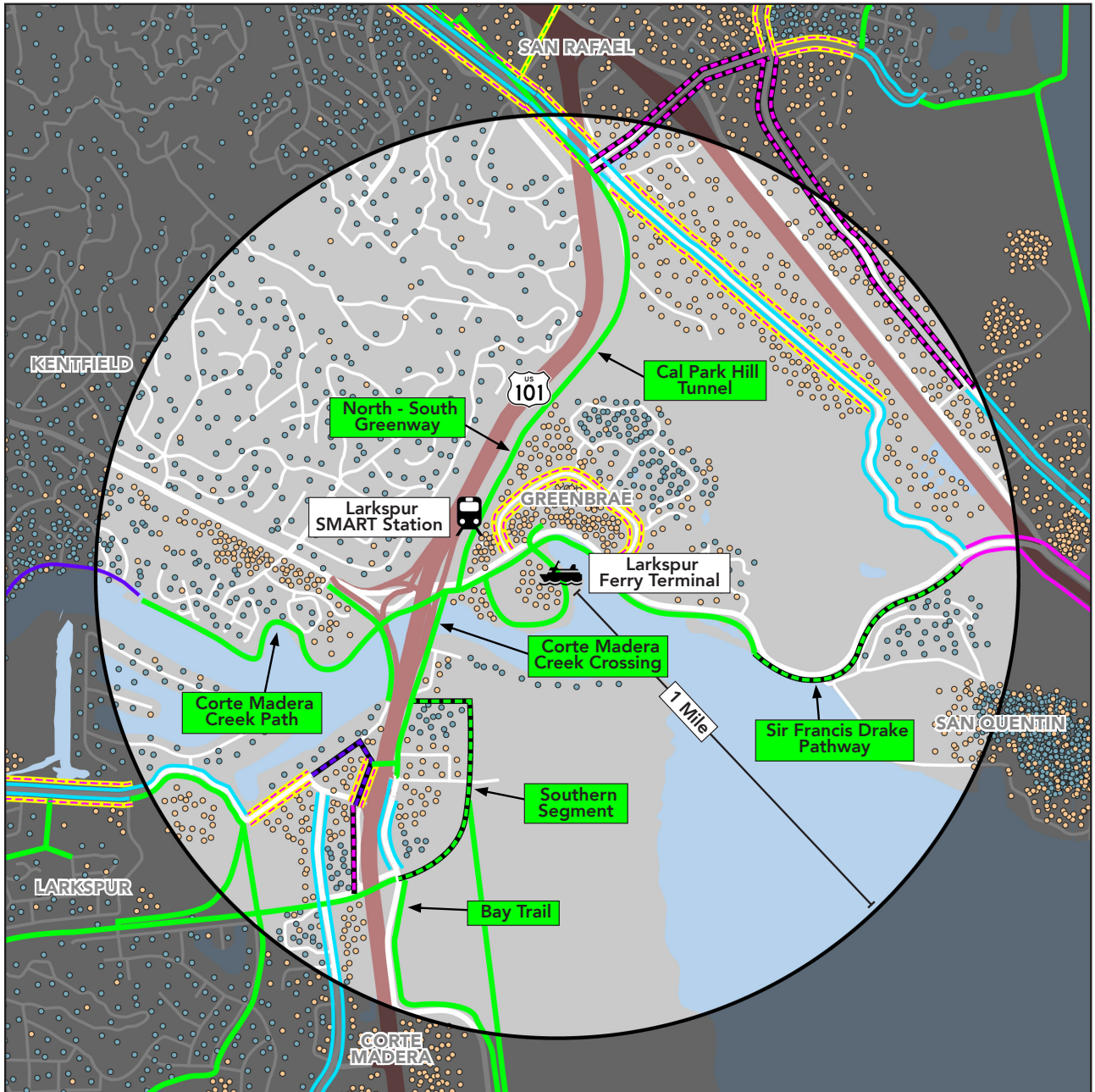






Appendix Exhibit B

Larkspur Ferry First-and-Last Mile Active Transportation Network, 2024



**LEGEND**

Existing Bikeways	Class I	Class II	Class III*	Class IV	SMART Railway	-----
Planned Bikeways					Population Density (1 dot = 10 people)	
Recommended Bikeways						

\*Maps show only selected Class III routes