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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

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### INTRODUCTION

The State CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the project while still meeting the general project objectives. The State CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

### Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines states: *“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”*

### Purpose

Section 15126.6(b) of the CEQA Guidelines states: *“Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.”*

### Significant Project Impacts

The project impacts that would be significant and unavoidable consist of the following:

- **Aesthetics** – Scenic Vistas (Short Term)
- **Noise** – Construction Noise

The project impacts that would be less than significant with identified mitigation include the following:

- **Air Quality** – Construction Phases Sensitive Receptor Impacts – Community Risk
- **Biological Resources** – Special-Status Species, Special Status Plants, Riparian Habitat, Jurisdictional Waters, Loss or Conversion of Forest Land, Conflicts with Local Ordinances, and Wildlife Movement

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- **Geology and Soils** – Strong Seismic Ground Shaking, Expansive Soils, Landslides and Slope Stability
  - **Hazards and Hazardous Materials** – Wildland Fires
  - **Hydrology and Water Quality** – Construction Phase Water Quality. Post-Construction (Operational) Phase Water Quality, Substantial Erosion or Siltation through Alteration and Drainage Patterns, Flooding by Altering Drainage Patterns or Runoff, and Expose Structures to Risk of Damage Due to Flooding
  - **Utilities and Utility Systems** – Wastewater Collection
  - **Cultural Resources** – Archeological Resources, Paleontological Resources, and Human Remains

The project impacts that would be less than significant include the following:

- **Aesthetics** – Scenic Vistas (Long Term), Visual Character of the Project Site and Surroundings, and Light and Glare
- **Hazards and Hazardous Materials** – Emergency Response Plan
- **Land Use and Planning** – Consistency with Applicable Land Use Plans, Policies, or Regulations, and Consistency with Applicable Zoning and Ordinances.
- **Noise** – Noise and Land Use Compatibility for the Proposed Residences, and Noise from the Operation of the Project Access Road and Increased Traffic on Upper Road on Adjacent Residences
- **Transportation/Traffic** – Construction Traffic, Existing Plus Project Intersection Operation, Site Access, Circulation, and Pedestrian and Bicycle
- **Utilities and Service Systems** – Wastewater Treatment

### **Selection of a Reasonable Range of Alternatives**

Section 15126.6(c) of the CEQA Guidelines states: *“The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”*

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## Project Objectives

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project. The objectives of the proposed project are as follows:

- Subdivision of the property into three residential lots, with lot sizes similar to or larger than surrounding residential uses to the northerly and easterly boundaries of the project site and at a density consistent with the Town of Ross General Plan and Zoning Ordinance;
- Construction of infrastructure to serve three lots;
- Ultimate construction of three fire-resistant residential units and related accessory buildings on the lots;
- Reduction of the currently dangerous fire load by removal of select vegetation and trees associated with the property to reduce the danger of the spread of a major conflagration impacting the Town of Ross;
- Upgrade the existing water main along the frontage of the project site, install a new main within the project, and install fire hydrants along both mains to improve the ability of local agencies to combat a major fire which might otherwise spread and threaten homes in the Town of Ross;
- Provision of additional water storage in two detention ponds and extension of a main and secondary driveways to serve the residences and provide fire safety access at the urban wildland interface;
- Location of the lots and their building envelopes to reduce aesthetic impacts associated with views from Goodhill Road;
- Reduction of fire fuel loads, with corresponding mitigation, at a level intended to reduce significant biological and forestry impacts;
- Location of lots and associated infrastructure to minimize slope instability; and
- Balancing all cut and fill on-site.

## Overview of Selected Alternatives

Three alternatives are evaluated in this analysis. Differences between alternatives range from changes to project density, site plans and construction methods. A more through description of each of the alternatives is provided below. The alternatives to be analyzed in comparison to the proposed project include:

Alternative A: No Project Alternative

Alternative B: Reduced Density Project Alternative (1 Single-Family Lot)

Alternative C: Off-Site Soil Hauling Project Alternative

### **Alternatives Considered but Rejected as Infeasible**

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible for detailed study, and briefly explain the reasons underlying the lead agency's determination. Furthermore, Section 15126(f)(1) states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire or control or otherwise have access to the alternative site. No one of these factors established a fixed limit on the scope of reasonable alternatives."

An alternative that uses the existing driveway as an access road: was considered but rejected because of fire marshal concerns related to the steep grade, as well as concerns related to noise and light and glare impacts to the adjacent 7 Upper Road property. An off-site alternative was rejected as infeasible because the project applicant does not own any other property that would be feasible for this project and cannot "reasonably acquire, control or otherwise have access to [an] alternative site" (refer to §15126.[f][1] of the CEQA Guidelines). An open space or park alternative was rejected as financially infeasible because it would not allow the landowner and developer to recover their investments and would not meet the basic objectives of the project. An alternative involving different land uses at the site (e.g., commercial, industrial) was rejected because the Town General Plan and zoning does not permit such uses at the site, and such an alternative may result in greater impacts compared to the project and would not meet the basic project objectives. Finally, alternatives based on previous residential subdivision applications for the site were dismissed because they would result in more environmental impacts compared to the project (e.g., more grading, greater amount of tree removal, etc.).

### **Assumptions and Methodology**

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate significant impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the proposed project and assumes that all applicable mitigation measures proposed for the project would apply to each alternative. The following alternatives analysis compares the potential significant environmental impacts of three alternatives with those of the proposed project for the environmental topics analyzed in detail in Sections IV.B – IV.L of the Draft SEIR.

## **A. NO PROJECT ALTERNATIVE**

As required by CEQA, this subsection analyzes a “No Project” Alternative (Alternative A). Under Alternative A, the proposed project would not be constructed, and the project site would remain in its current condition. The analysis of Alternative A assumes the continuation of existing physical conditions on the site, as well as development of the related projects described in Section III.B (Related Projects). The potential environmental impacts associated with Alternative A are described below and are compared to the environmental impacts associated with the proposed project.

### **Aesthetics**

Under Alternative A, no grading or development would occur on the project site and the existing aesthetic characteristics would remain unchanged. There would be no impacts to scenic views, scenic resources, visual character and no new sources of light and glare on the site. Therefore, this alternative would eliminate the proposed project’s significant and unavoidable, short-term, impacts to visual resources. Accordingly, overall impacts to aesthetics would be less under Alternative A than under the proposed project.

### **Air Quality**

Under Alternative A, no grading or construction would occur at the site. Thus, this alternative would not generate any fugitive dust or other pollutant emissions associated with construction activities at the site. Implementation of Alternative A would result in no air quality impacts resulting from construction activities, compared to the project’s short-term, significant but mitigable air quality impacts resulting from construction activities. Overall impacts to air quality would be less under Alternative A than under the proposed project.

### **Biological and Forestry Resources**

Because the project site would not be developed under Alternative A, no grading would occur and no vegetation would be removed from the site. Also, no encroachment within Swan Swale or the associated riparian buffer would occur under this alternative. Thus, Alternative A would have no impacts related to the special-status wildlife species, jurisdictional waters, riparian habitat, or wildlife movement. However, under Alternative A, invasive non-native plant species within the project area would not be removed. While the project’s significant biological and forestry resources impacts can be mitigated to less-than-significant levels, biological and forestry resources impacts would still be less than the proposed project under Alternative A.

## **Geology and Soils**

Under Alternative A, no development would occur on the site. Therefore, this alternative would eliminate the project's significant but mitigable impacts related to soil instabilities (i.e., seismic ground shaking, expansive soils, and landslides and slope stability). Overall impacts to geology and soils would be less under Alternative A than under the proposed project.

## **Hazards and Hazardous Materials**

Because the project site would not be developed under Alternative A, removal of vegetation and trees associated with the property to reduce fire danger would not occur. However, unlike the proposed project, Alternative A would not introduce new homes into a site situated adjacent to a Very High Fire Hazard Severity Zone (VHFHSZ). Wildfire impacts under Alternative A would be less than significant compared to the project's less-than-significant impact after mitigation.

## **Hydrology and Water Quality**

Under Alternative A, the project site's drainage patterns would not change and on-site drainages would not be impacted. As no new impermeable surfaces would be added, Alternative A would result in fewer impacts relative to storm water runoff. Non-point source water quality impacts associated with Alternative A would also be less compared to the proposed project because this alternative would not introduce new buildings or driveways on the site. This alternative would eliminate the proposed project's significant but mitigable impacts related to soil erosion, stormwater runoff, drainage and flooding. While the project's significant hydrology and water quality impacts can be completely mitigated, impacts associated hydrology would be less under Alternative A than under the proposed project.

## **Land Use and Planning**

Under Alternative A, no development on the project site would occur, and as such, no conflicts with applicable land use plans, policies, and regulations would occur. Therefore, this alternative would result in no impacts related to land use and planning, compared to the project's less-than-significant impacts related to consistency with applicable land use plans, policies and regulations.

## **Noise**

Because Alternative A would not involve any grading or development on the project site or new vehicle trips, this alternative would result in no impacts related to construction and operational noise, compared to the project's less-than-significant operational noise impacts and significant and unavoidable noise impacts related to construction noise. Thus, impacts related to noise would be less under Alternative A than under the proposed project.

## **Transportation and Traffic**

Under Alternative A, no development on the project site would occur, and as such, no new vehicle trips would be generated. Therefore, this alternative would result in no impacts related to traffic hazards, access and on-site circulation, emergency access, parking, transit service,

and pedestrian and bicycle facilities, compared to the project's less-than-significant impacts related to each of these issue areas listed above.

### **Utilities and Service Systems**

#### *Wastewater Service*

Because Alternative A would not result in the development of single-family residential land uses on the project site, this alternative would not result in generation of wastewater at the project site. Alternative A would eliminate the proposed project's significant but mitigable wastewater distribution impacts and result in no impact. Thus, wastewater impacts would be less under Alternative A than under the proposed project.

### **Cultural Resources**

Under Alternative A, no ground-disturbing activities would occur at the site. Since no ground-disturbing activities would occur, Alternative A would result in no impacts to archaeological resources, paleontological resources, and human remains, compared to the project's potential significant but mitigable impacts related to archaeological resources, paleontological resources, and human remains. Thus, impacts associated with cultural resources would be less under Alternative A than under the proposed project.

### **Relationship of Alternative A to the Project Objectives**

As stated previously, under Alternative A, the proposed project would not be constructed and therefore would not meet any of the proposed project objectives. Alternative A would not achieve the objective of subdivision of the property into three residential lots, with lot sizes similar to or larger than surrounding residential uses to the northerly and easterly boundaries of the project site and at a density consistent with the Town of Ross General Plan and Zoning Ordinance. Alternative A would not achieve the objective of construction of infrastructure to serve three lots. Alternative A would not achieve the objective of reducing the currently dangerous fire load by removal of select vegetation and trees associated with the property to reduce the danger of the spread of a major conflagration impacting the Town of Ross. Alternative A would not achieve the objective of upgrading the existing water main along the frontage of the project site, installing a new main within the project, and installing fire hydrants along both mains to improve the ability of local agencies to combat a major fire which might otherwise spread and threaten homes in the Town of Ross. Alternative A would not achieve the objective of balancing all cut and fill on-site. Furthermore, due to the lack of development and project features, Alternative A does not meet the overall intent of the *2007-2025 General Plan* land use designation for the project site.

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## **B. REDUCED DENSITY PROJECT ALTERNATIVE**

Under Alternative B (Reduced Density Project Alternative), the proposed project would consist of a single residential lot. Alternative B would maintain the construction of utilities and a road for access to the parcel. Under Alternative B, the project would include:

- Reduced building pads, driveways and roadways
- Reduced grading
- Reduced on-site project fill
- No other aspects of the project would be removed or relocated

### **Aesthetics**

Under Alternative B, only a single parcel would be developed. The alternative would still require the grading of a road to create access to the parcel, albeit potentially less grading than the proposed project requires with elimination of two of the proposed building sites. As such, Alternative B would still require enough grading and tree removal to create a short term significant and unavoidable impact to scenic vistas, while long term impacts to scenic vistas would be less than significant. These are similar impacts that would occur under the proposed project, however, to a lesser degree than the proposed project.

### **Air Quality**

Alternative B could result in equal or less air emissions compared to the project, depending on the proposed design for a single family residential development. If it involved less grading and construction, there may be less on-site soil hauls due to the reduction in grading. Fugitive dust and exhaust emissions could also decrease relative to the proposed project. Sensitive receptors would still be located within applicable screening distances identified by the Bay Area Air Quality Management District (BAAQMD), resulting in potentially significant risk and hazards impacts from construction, as with the proposed project. Proposed project impacts related to construction-related emissions would be significant, but could be reduced to a less than significant level with the mitigation measures as described in Section IV.C, Air Quality. Under Alternative B, significant impacts would occur, and the mitigation measures previously referenced would reduce the impacts to a less than significant level, similar to the proposed project. Thus, impacts associated with Air Quality under Alternative B would be less than the proposed project.

### **Biological and Forestry Resources**

There would be less development on the site under Alternative B, but it would still require a significant amount of site preparation and grading activities. Site preparation and grading activities would require the removal of existing vegetation that is located on the project site. Sensitive species, including raptors, nesting birds, CRLF, Pacific Pond Turtle, Steelhead Trout and bats as described in Section IV.C, could potentially use the project site or Ross Creek.



Construction and operation activities under Alternative B and the proposed project have the potential to impact these species. These impacts are similar to those identified under the proposed project, and can be completely mitigated by implementing the mitigation measures listed in Section IV.C. Similar to the proposed project, this alternative would also result in potentially significant impacts that can be mitigated to less-than-significant levels for jurisdictional waters, riparian habitat, protection of trees, and wildlife movement. Overall, impacts to biological resources under Alternative B would be less compared to the proposed project.

### **Geology and Soils**

The project site would still be subjected to ground shaking and related hazards under both Alternative B and the proposed project. Compliance with the Building Code and geotechnical report recommendations would ensure that no significant earth resource impacts would be created under this alternative. Section IV.E, Geology and Soils, concluded that development of the proposed project would result in significant impacts related to strong seismic ground shaking, expansive soils, flooding, and landslides. With implementation of the mitigation measures prescribed in Section IV.E., these impacts would be reduced to a less than significant level. Under Alternative B, a reduction in housing units would lower the potential for risk to persons and property. Therefore, impact would be less under Alternative B than under the proposed project.

### **Hazards and Hazardous Materials**

Any reduction in grading and units associated with Alternative B is not anticipated to substantially change the wildfire impacts associated with the project. Implementation of Alternative B would result in less-than-significant impacts related to interference with emergency plans, and potentially significant impacts to wildland fires. Like the proposed project, impacts to wildland fires can be reduced to a less-than-significant level with mitigation outlined in Section IV.F. Under Alternative B, a reduction in housing units would lower the potential population at risk to wildland fires compared to the proposed project. Alternative B would also require slightly less wildfire vegetation management due to two fewer residences and a shorter access road compared to the proposed project. Thus, impacts would be less under Alternative B than under the proposed project.

### **Hydrology and Water Quality**

Alternative B contains less development compared to the proposed project and, therefore, would provide less impermeable surfaces on the project site. The reduction in impermeable surfaces on the project site would cause a reduction in runoff rates and velocities compared to the proposed project. Therefore, surface hydrology impacts from Alternative B would be less than those associated with the proposed project, although the project's significant hydrology impacts can be mitigated to less-than-significant levels. Water quality impacts associated with Alternative B would be similar to those associated with the proposed project due to mandatory compliance with the San Francisco Bay Region Municipal Regional Stormwater National

Pollutant Discharge Elimination System (NPDES) Permit and the Marin County Stormwater Pollution Prevention Program (MCSTOPPP). Additionally, impacts related to water quality during and post construction can be completely mitigated by implementing the mitigation measures listed in Section IV.E.

### **Land Use and Planning**

Section IV.H, Land Use and Planning, found that the proposed project would result in less-than-significant impacts related to consistency with applicable land use plans, policies, regulations, zoning and ordinances. Given that Alternative B proposes similar, albeit reduced, development, this alternative would also result in less-than-significant impacts related to consistency with applicable land use plans, policies, regulations, zoning and ordinances.

### **Noise**

Although less construction would be associated with Alternative B compared to the project due to a reduction in grading and units, this alternative would still result in significant and unavoidable impacts related to construction noise, as would the proposed project. Like the project, Alternative B would result in less-than-significant operational noise impacts. Overall impacts related to noise would be less under Alternative B than under the proposed project.

### **Transportation and Traffic**

Section IV.J, Transportation/Traffic, found that the proposed project would result in less-than-significant impacts related to traffic hazards, access and on-site circulation, emergency access, parking, transit service, and pedestrian and bicycle facilities. Given Alternative B reduces the development associated with the project, this alternative would also result in less-than-significant impacts related to traffic hazards, access and on-site circulation, emergency access, parking, transit service, and pedestrian and bicycle facilities.

### **Utilities and Service Systems**

#### *Wastewater Service*

Because Alternative B would result in the development of two fewer single-family residential land uses on the project site, this alternative would result in a reduced amount of wastewater generated at the project site. However, Alternative B would still generate wastewater that could potentially have a significant impact on wastewater distribution services. Implementation of the mitigation measures prescribed in Section IV.K would reduce any potentially significant impacts to a less-than-significant level, similar to the proposed project. Overall impacts to wastewater services would be less under Alternative B compared to the proposed project.

### **Cultural Resources**

Alternative B includes grading of portions of the site, which carries the potential for affecting unknown cultural resources. However, Alternative B involves less grading and less development of the site than the proposed project. Therefore, the potential to damage or destroy unknown pre-historic archaeological resources, paleontological resources and human

remains would be less under Alternative B. Implementation of the mitigation measures prescribed in Section IV.L would reduce any potentially significant impacts to a less-than-significant level, similar to the proposed project. Overall impacts to cultural resources would be less under Alternative B compared to the proposed project.

### **Relationship of Alternative B to the Project Objectives**

As stated previously, under Alternative B, the proposed project would be reduced to a single Parcel for development. Alternative B would not achieve the objective of subdivision of the property into three residential lots, with lot sizes similar to or larger than surrounding residential uses to the northerly and easterly boundaries of the project site and at a density consistent with the Town of Ross General Plan and Zoning Ordinance. Alternative B would not achieve the objective of construction of infrastructure to serve three lots. Alternative B would achieve the objective of reducing the currently dangerous fire load by removal of select vegetation and trees associated with the property to reduce the danger of the spread of a major conflagration impacting the Town of Ross. Alternative B would achieve the objective of upgrading the existing water main along the frontage of the project site, installing a new main within the project, and installing fire hydrants along both mains to improve the ability of local agencies to combat a major fire which might otherwise spread and threaten homes in the Town of Ross. Alternative B would achieve the objective of balancing all cut and fill on-site. Furthermore, Alternative B would meet the overall intent of the *2007-2025 General Plan* land use designation for the project site.

## **C. OFF-SITE SOIL HAULING PROJECT ALTERNATIVE**

Under Alternative C (Off-Site Soil Hauling), the project would be similar to the proposed project with the exception that all cut material from site grading (approximately 23,100 cubic yards) would be hauled off-site to an appropriate disposal facility and not balanced on-site. Alternative A would not include the proposed project's fill area and associated retaining walls between Swan and Frog Swales. Also, Alternative C would not require the transport of soil over Swan Swale to an on-site fill area.

Under Alternative C, the project would include:

- Three residential parcels in the same location as the proposed project
- All design, access, landscaping, etc. would be the same as the proposed project
- The alternative would have the same internal circulation and ingress/egress as the proposed project

### **Aesthetics**

Under Alternative C, the project would be similar to the proposed project with the exception that cut soil would be trucked off-site and there would be no on-site fill area between Swan and Frog Swales. Likewise, the series of six terraced concrete retaining walls of approximately six feet in

height would not be constructed on Parcel 1 to buttress fill material. As a result, Alternative C would result in fewer impacts to scenic vistas, scenic resources, and visual character compared to the proposed project and the same light and glare impacts. Both Alternative C and the proposed project would have significant and unavoidable impacts to scenic vistas in the short-term, due to tree removal. Overall, aesthetics impacts under Alternative C would be less compared to the proposed project.

### **Air Quality**

Alternative C would result in a slight increase in community risk impacts from construction activities compared to the project because Alternative C involves similar grading as the project, as well as the hauling of fill material off-site. In particular, Alternative C would have an increase of 0.3 excessive cancer cases per million for children, with a score of 10.4 cases per million. The proposed project has a score of 10.1 cases per million; both are above the BAAQMD threshold of 10.0 cases per million. There is no difference between Alternative C and the project when it comes to adult risks. Similar to the project, with mitigation, Alternative C would result in less-than-significant impacts related to community risk impacts, with both being below the threshold. Using the mitigation measures outlined in Section IV.C, Air Quality, Alternative C would lower risk to 7.5 cases per million for children, below BAAQMD's threshold. The alternative would still hold a 0.3 increase over the project with similar mitigation. Also similar to the proposed project, Alternative C would result in less-than-significant air quality impacts related to: objectionable odors, consistency with Air Quality Plan, operational emissions, cumulative regional operational emissions, sensitive receptors, and greenhouse gas emissions.

### **Biological and Forestry Resources**

With the exception of the fill area associated with the proposed project, site preparation and grading activities for the development of Alternative C would be similar to the proposed project. Site preparation and grading activities would require the removal of the existing vegetation that is located on the project site. Sensitive species, as described in Section IV.D, could potentially use the project site. Construction and operation activities under Alternative C and the proposed project have the potential to impact these species. These impacts are similar to those identified in Section IV.D and can be completely mitigated by implementing the mitigation measures listed in Section IV.D. Similar to the proposed project, Alternative C would result in potentially significant impacts that can be mitigated to less-than-significant levels for jurisdictional waters, riparian habitat, invasive plant species and wildlife movement. Project impacts would be lessened under Alternative C by not constructing the proposed retaining wall on Parcel 1 which overlaps the NSO occurrence location. Approximately 75 fewer trees would have to be removed under Alternative C by not constructing the on-site fill area and associated retaining wall on Parcel 1 (see Figure III-14, Existing Trees to be Removed and Replaced). Alternative C would also avoid the need to transport fill over Swan Swale to the proposed fill location, thus reducing potentially significant impacts to CRLF that may disperse in the Ross Creek watershed. Less construction and fill on-site would minimize the potential for significant impacts described within Section IV.D to occur. Given Alternative C does not include the fill area

associated with the proposed project; this alternative would have less of an impact than the proposed project on biological resources.

### **Geology and Soils**

The project site would still be subjected to ground shaking and related hazards under both Alternative C and the proposed project. Compliance with the Building Code and geotechnical report recommendations would ensure that no significant earth resource impacts would be created under this alternative. Geology and soil impacts associated with Alternative C would be slightly less compared to the proposed project due to the elimination of the proposed project's fill area and associated retaining walls. Section IV.E. Geology and Soils concluded that development of the proposed project would result in significant impacts related to strong seismic ground shaking, expansive soils, flooding, and landslides. With implementation of the mitigation measures prescribed in Section IV.E., these impacts would be reduced to a less than significant level. Overall, geology and soils impacts under Alternative C would be less compared to the proposed project.

### **Hydrology and Water Quality**

With the exception of the proposed project's fill area which is not a part of this alternative, Alternative C includes similar development compared to the proposed project and, therefore, would provide similar impermeable surfaces on the project site. As such, impermeable surfaces on the project site would create similar runoff rates and velocities compared to the proposed project. Therefore, surface hydrology impacts from Alternative C would be close to those associated with the proposed project, with both being mitigable to less-than-significant levels. Furthermore, Alternative C would be similar due to mandatory compliance with the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit and the MCSTOPPP. Additionally, impacts related to drainage alteration can be completely mitigated by implementing the mitigation measures listed in Section IV.E. Therefore, Alternative C would have similar hydrology and water quality impacts as the proposed project.

### **Hazards and Hazardous Materials**

Hazards and hazardous materials impacts under Alternative C would be similar to those of the proposed project. Implementation of Alternative C would result in less-than-significant impacts related to the routine use, transport and disposal of hazardous materials, similar to the project. Implementation of Alternative C would also result in less-than-significant impacts related to interference with emergency plans. Potentially significant impacts to wildland fires under both Alternative C and the proposed project can be reduced to less-than-significant levels with the mitigation measures outlined in Section IV.H.

## **Land Use and Planning**

Section IV.H Land Use and Planning found that the proposed project would result in less-than-significant impacts related to consistency with applicable land use plans, policies, regulations, zoning and ordinances. Given that Alternative C proposes similar development, this alternative would also result in less-than-significant impacts related to consistency with applicable land use plans, policies, regulations, zoning and ordinances.

## **Noise**

Section IV.I, Noise, determined that the proposed project would result in significant and unavoidable noise impacts during the grading and construction phase but less-than-significant operational noise impacts. Alternative C would also result in significant and unavoidable noise impacts during the grading and construction phase and less-than-significant noise impacts during the operational phase. However, construction noise levels would increase by up to 11 decibels at adjacent residential receivers under this alternative due to soil haul trucks required to export soil off-site (Appendix H). Therefore, construction noise impacts under Alternative C would be greater than the proposed project, whereas operational noise impacts under Alternative C would be the same as the project.

## **Transportation and Traffic**

Under Alternative C, grading of the site would involve trucks hauling soil from the project site to an off-site location. Per information provided by the project applicant, a “fill time” of 20 minutes per truck load was assumed, resulting in an average of three trucks per hour for nine hours per weekday from 8:00 AM to 5:00 PM, or 27 truckloads per day. With a total of 27,000 cubic yards of soil to be exported, use of “SuperDump” 3-axle trucks having a capacity of 12 cubic yards translates to approximately 84 working days. Based on the above information and assuming that the truck trips will be distributed evenly throughout the nine-hour work day, approximately 54 daily truck trips would be generated by the soil hauling alternative. Based on the assumptions applied, the soil hauling alternative is expected to generate an average of 75 trips per day during construction, including 21 passenger vehicle trips and 54 truck trips.

To determine whether the Alternative C would have a significant impact on the pavement for the study roadways, Traffic Indices (TI) were estimated. Because this area is generally built out, for the purposes of this analysis it was assumed that an alternative of this magnitude affects the study roadways about once every three to five years. Alternative C would require 2,250 3-axle trucks to haul the soil off-site, resulting in an average of two daily truck trips when spread over the entire time period during which these would be the bulk of the truck activity affecting the study roadways. The TI values that would be used to design the roadway under Existing Conditions and Existing plus Soil Hauling Alternative are summarized in Table VI-1.

**Table VI-1  
Project Vehicle Traffic Index**

Roadways	Existing Conditions	Existing plus Soil Hauling Alternative
	Traffic Index (TI)	
<b>Glenwood Avenue</b>		
Northbound	5.5	5.5
Southbound	5.5	5.5
<b>Upper Road</b>		
Eastbound	5.0	5.5
Southbound	5.0	5.5

As shown in Table VI-1, the Traffic Index for Glenwood Avenue is not expected to increase with the addition of the trucks due to Alternative C, indicating a less-than-significant impact on the pavement. However, for Upper Road the TI is expected to increase by 0.5, which is considered to be a potentially significant impact. The Traffic Index calculations are provided in Appendix I. To mitigate for such impacts, the condition of the pavement on Upper Road would have to be documented through a videotape or other record prior to initiating construction as a part of Alternative C. Upon completion the alternative, the pavement condition would again be documented, and any segments that have deteriorated, as indicated by cracking, potholes, broken edges, and other physical evidence, would have to be repaired.

Section IV.J, Transportation/Traffic, presents the determination that the project would result in less-than-significant traffic impacts during construction and operation of the proposed project. Operational traffic impacts associated with Alternative C would be the same as the proposed project and less than significant. However, the significant construction traffic impacts associated with Alternative C would be greater than the proposed project but these impacts can be mitigated to less-than-significant levels.

### **Utilities and Service Systems**

#### *Wastewater Service*

Wastewater distribution and treatment impacts under Alternative C would be the same as the proposed project as Alternative C involves the same number of single-family residential units as the project. Potentially significant impacts to wastewater distribution services under both Alternative C and the proposed project can be reduced to less-than-significant levels with the mitigation measures outlined in Section IV.K.

## **Cultural Resources**

Due to the elimination of the proposed project's fill area as a part of Alternative C, this alternative would require less grading compared to the proposed project. As a result, cultural resources impacts associated with Alternative C would be slightly less to those associated with the project. Such impacts include no historical resource impacts and significant but mitigatable impacts related to archaeological resources and paleontological resources and human remains. Therefore, Alternative C would have the potential to result in fewer cultural resources impacts than the proposed project.

## **Relationship of Alternative C to the Project Objectives**

As stated previously, under Alternative C, the project would be similar to the proposed project with the exception of cut soil placement and therefore meet all of the proposed project objectives. Alternative C would achieve the objective of the subdivision of the property into three residential lots, with lot sizes similar to or larger than surrounding residential uses to the northerly and easterly boundaries of the project site and at a density consistent with the Town of Ross General Plan and Zoning Ordinance. Alternative C would achieve the objective of construction of infrastructure to serve three lots. Alternative C would achieve the objective of reducing the currently dangerous fire load by removal of select vegetation and trees associated with the property to reduce the danger of the spread of a major conflagration impacting the Town of Ross. Alternative C would achieve the objective of upgrading the existing water main along the frontage of the project site, installing a new main within the project, and installing fire hydrants along both mains to improve the ability of local agencies to combat a major fire which might otherwise spread and threaten homes in the Town of Ross. Alternative C would not achieve the objective of balancing all cut and fill on-site. Furthermore, Alternative C would meet the overall intent of the *2007-2025 General Plan* land use designation for the project site.

## **D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the Town and/or project applicant.

In this case, Alternative A (No Project Alternative) would result in the least amount of significant environmental impacts (Table VI-2). However, Section 15126.6 of the CEQA Guidelines requires that another environmentally superior alternative be selected in addition to the No Project Alternative. Based on the analysis provided above it has been determined that Alternative B (Reduced Density Project Alternative) would be the environmentally superior alternative. While Alternative B would meet most of the project objectives, in addition to



reducing potential impacts, it may not be economically viable due to its reduced size compared to the proposed project.

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**Table VI-2  
Alternatives Comparison**

<b>IMPACT AREA</b>	<b>IMPACTS OF THE PROPOSED PROJECT</b>	<b>ALTERNATIVE A (No Project Alternative)</b>	<b>ALTERNATIVE B (Reduced Density Project Alternative)</b>	<b>ALTERNATIVE C (Off-Site Soil Hauling Project Alternative)</b>
<b>Aesthetics</b>				
AES-1a: Scenic Vistas (Short Term)	Significant and Unavoidable	No Impact	Significant and Unavoidable	Significant and Unavoidable
AES-1b: Scenic Vistas (Long Term)	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
AES-2: Visual Character of the Project Site and Surroundings	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
AES-3: Light and Glare	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
<b>Air Quality</b>				
AIR-1: Construction Phase Sensitive Receptor Impacts – Community Risk	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<b>Biological and Forestry Resources</b>				
BIO-1: Special-Status Wildlife Species				
<i>BIO-1a: Disturbance to Northern Spotted Owl</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>BIO-1b: Other Nesting Birds</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>BIO-1c: California Red-legged Frog</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>BIO-1d: Pacific Pond Turtle</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>BIO-1e: Steelhead Trout</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>BIO-1f: Bats</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>BIO-1g: Special-Status Plant Species</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
BIO-2: Riparian Habitat	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
BIO-3: Jurisdictional Waters	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Density Project Alternative)	ALTERNATIVE C (Off-Site Soil Hauling Project Alternative)
BIO-4: Conflict with Local Ordinances	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>Bio-4a: Protection of Trees</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>Bio-4b: Natural Areas Retention</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
BIO-5: Loss or Conversion of Forest Land	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
BIO-6: Disturbance of Movement, Migration Corridors, and Nursery Sites	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<b>Geology and Soils</b>				
GEO-1: Strong Seismic Ground Shaking	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
GEO-2: Expansive Soils	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
GEO-3: Landslides and Slope Stability	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<b>Hazards and Hazardous Materials</b>				
HAZ-1: Emergency Response Plan	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
HAZ-2: Wildland Fires	Less Than Significant With Mitigation	Less Than Significant	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<b>Hydrology and Water Quality</b>				
HYDRO-1: Construction Phase Water Quality	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
HYDRO-2: Post-Construction (Operational) Phase Water Quality Impacts				
<i>HYDRO-2a: Stormwater Runoff Peak Flows</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>HYDRO-2b: Post-Construction Phase Water Quality</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Density Project Alternative)	ALTERNATIVE C (Off-Site Soil Hauling Project Alternative)
HYDRO-3: Substantial Erosion or Siltation through Alteration of Drainage Patterns	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
HYDRO-4: Flooding by Altering Drainage Patterns or Generating Runoff that Exceeds the Capacity of the Stormwater Drainage System	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
HYDRO-5: Expose Structures to Risk of Damage Due to Flooding as a Result of Phoenix Dam Failure	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<b>Land Use and Planning</b>				
LU-1: Consistency with Applicable Land Use Plans, Policies or Regulations	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
LU-2: Consistency with Applicable Zoning and Ordinances	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
<b>Noise</b>				
NOISE-1: Noise and Land Use Compatibility for the Proposed Residences	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
NOISE-2: Noise from the Operation of the Project Access Road and Increased Traffic on Upper Road on Adjacent Residences	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
NOISE-3: Construction Noise	Significant and Unavoidable	No Impact	Significant and Unavoidable	Significant and Unavoidable
<b>Transportation/Traffic</b>				
TRAFFIC-1: Construction Traffic	Less Than Significant	No Impact	Less Than Significant	Less Than Significant With Mitigation
TRAFFIC-2: Existing Plus Project Intersection Operation	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
TRAFFIC-3: Site Access	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
TRAFFIC-4: Circulation	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
TRAFFIC-5: Pedestrian and Bicycle Facilities	Less Than Significant	No Impact	Less Than Significant	Less Than Significant

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Density Project Alternative)	ALTERNATIVE C (Off-Site Soil Hauling Project Alternative)
<b>Utilities and Service Systems</b>				
UTIL-1: Wastewater Collection	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
UTIL-2: Wastewater Treatment	Less Than Significant	No Impact	Less Than Significant	Less Than Significant
<b>Cultural Resources</b>				
CULT-1: Archaeological Resources	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
CULT-2: Paleontological Resources:	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation
CULT-3: Human Remains	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation