5. ALTERNATIVES

The State CEQA Guidelines (Section 15126.6) require that an EIR describe and evaluate the comparative merits of a range of reasonable alternatives to the project, or to the location of the project, that could feasibly attain most of the basic objectives of the project. The CEQA Guidelines further require that the discussion focus on alternatives capable of avoiding or substantially lessening any of the significant effects of the project, including the "No Project" Alternative. Furthermore, if the environmentally superior alternative is the "No Project" Alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

The project objectives are discussed in Chapter 3, Project Description. This discussion will focus on alternatives that could address potentially significant impacts. The EIR identifies potentially significant impacts that can be reduced to a less-than-significant level with implementation of mitigation measures.

Three alternatives are evaluated in this section:

- Alternative 1: No Project (Existing 110-Room Hotel)
- Alternative 2: Alternative with Retention of the Pond and FAR of 0.52 (147-Room Hotel)
- Alternative 3: Alternative with Filling in Pond and Limit of 0.34 FAR (111-Room Hotel)

5.1 SUMMARY OF ALTERNATIVES

ALTERNATIVE 1: NO PROJECT (EXISTING 110-ROOM HOTEL)

The No Project Alternative would leave the site in an unchanged condition from its existing use. The existing 110-room hotel would remain on the site, as would the existing 8,826-square-foot restaurant and 188 parking spaces. The access points and existing conference space would remain unchanged. A total of 52 to 60 fulltime equivalent (FTE) employees would continue to be located on the site. The pond would remain unchanged, and no landscaping on the site would be altered. The existing swimming pool would remain on the site.

This alternative would not meet the project objectives related to having a dual-branded hotel and providing upgrades to the hotel to meet current market demand for a mid/upper-scale hotel. This alternative would also not meet the objective of providing extended-stay accommodations, improving safety at the Madera Boulevard auto entrance, and eliminating the pond for aesthetic, odor, and safety reasons. [1] New additional conference space would not be provided and energy efficiency/water conservation measures would not be implemented.

[1] It should be noted that there may be ways to improve the overall water quality and habitat value of the pond through better water circulation, native revegetation, and re-landscaping around the entire feature that could be incorporated into this alternative. Creating a shelf or terrace around most of the existing pond by importing fills and regrading the perimeter to support wetland vegetation (like the small area of native vegetation at the northern end of the existing pond) would greatly improve habitat values and aesthetics and would probably reduce odor problems, One or two fountains could be added to improve aeration, which would improve the odor problems as well. Such systems have been created in Foster City and Aquatic Park in Berkeley, which all point to improved water circulation to improve pond health and aesthetics.

ALTERNATIVE 2: ALTERNATIVE WITH RETENTION OF POND AND FAR OF 0.52 (147-ROOM HOTEL)

Alternative 2 would leave the pond in its current location. A new hotel would be built on the remaining site area (see **Figure 5-1**) with an FAR of 0.52. While the proposed project has an FAR of 0.55, certain constraints related to height, landscaping, parking, and circulation requirements would limit the FAR of this alternative to 0.52. The hotel would include 147 rooms in a three-story building as shown in Figure 5-1. The hotel would be oriented with the majority of the building fronting Tamal Vista Boulevard. It would include the same amount of conference space as the proposed project (i.e., 3,600 square feet). Similar amenities to the proposed project would be provided such as a fitness room, business center, and swimming pool. Trees would also be removed for this alternative, but the exact number has not been identified.

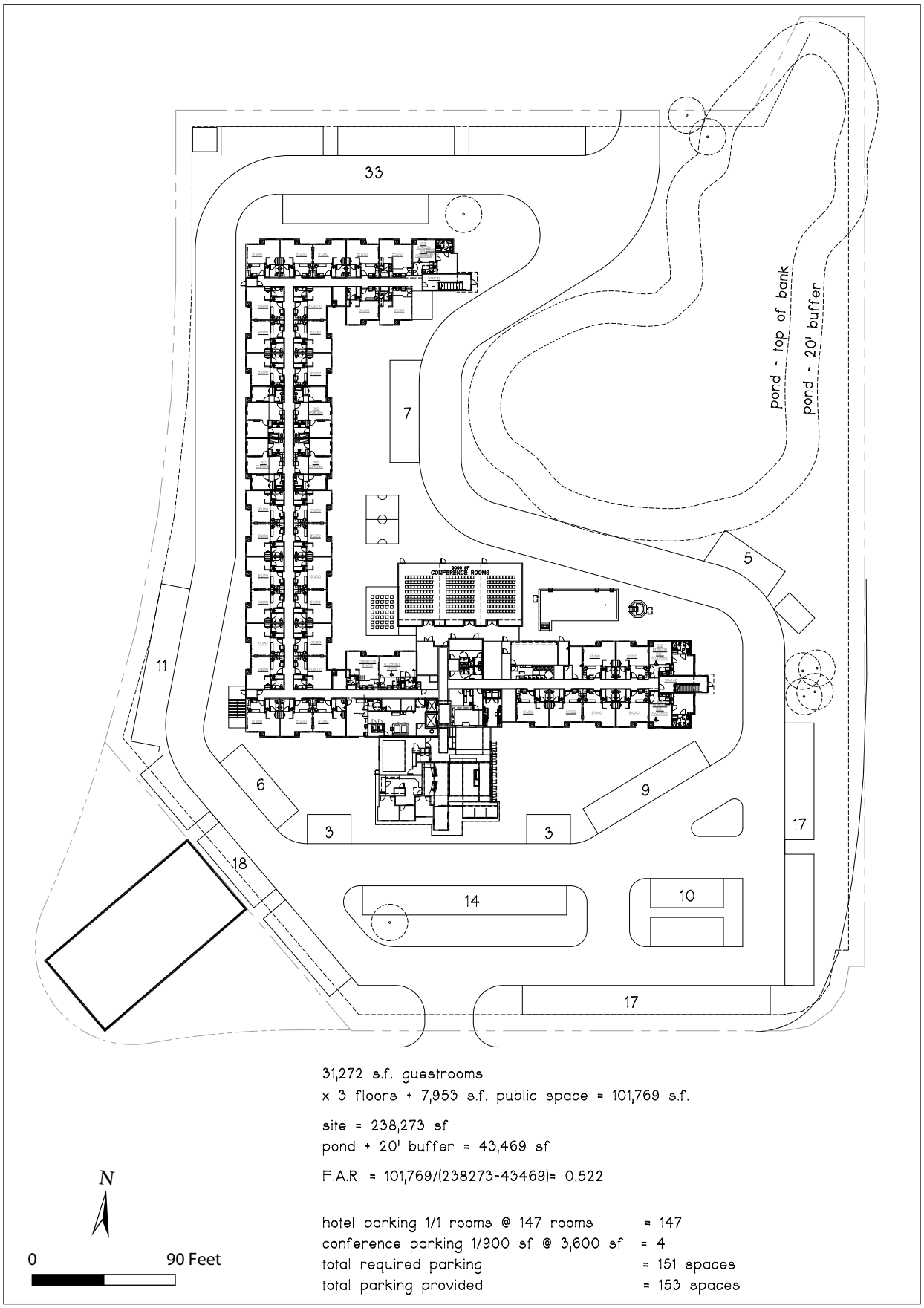
The aesthetic condition and habitat values of the existing pond could be improved to reduce odor and safety concerns. Further detailed study would be conducted to determine options for improving conditions associated with the pond, but would most likely involve improved water circulation and aeration during the spring, summer, and fall months. This could possibly be achieved through increased hydrologic connection with the existing culvert and slide gate that connects to the tidally influenced drainage ditch along the west side of U.S. Highway 101, use of permanent spray fountains, and seasonal circulation with Lagoon No. 1. Reconfiguring the banks of the existing pond to create shallow terraces around the entire perimeter would allow for establishment of native marsh vegetation for natural filtration functions and could reduce the hazard posed by the existing steeply sided banks.

This alternative would meet most of the basic project objectives as related to minimizing visual intrusion, serving as a community gathering place during times of emergency, providing a convenient hotel lobby entrance, and providing recreational facilities. However, it would not meet objectives related to the number of hotel rooms for both short-term and long-term accommodations, limiting the mass and height of the building on Tamal Vista Boulevard near existing residences, and eliminating the pond.

ALTERNATIVE 3: ALTERNATIVE WITH FILLING IN POND AND LIMIT OF 0.34 FAR (111-ROOM HOTEL)

Alternative 3 would include filling of the pond and reducing the size of the hotel building from the 0.55 FAR of the proposed project to an FAR of 0.34 as allowed by current zoning. The result would be a 111-room hotel in a three-story building, proving one more hotel room than currently provided. The hotel would be “L” shaped, with one wing facing the highway and the other facing Madera Boulevard as shown in **Figure 5-2**.

The same amount of conference space would be provided as for the proposed project (i.e., about 3,600 square feet). Amenities such as swimming pool, business center and fitness room would be provided, similar to the proposed project. While a total of 398 parking spaces are shown in Figure 5-2, only 115 spaces would be required. Thus, there is an opportunity to include more on-site landscaping than has been shown in Figure 5-2.



SOURCE: Reneson Hotels, Inc. 2014

Figure 5-1

ALTERNATIVE 2: ALTERNATIVE WITH RETENTION OF POND AND FAR OF 0.52

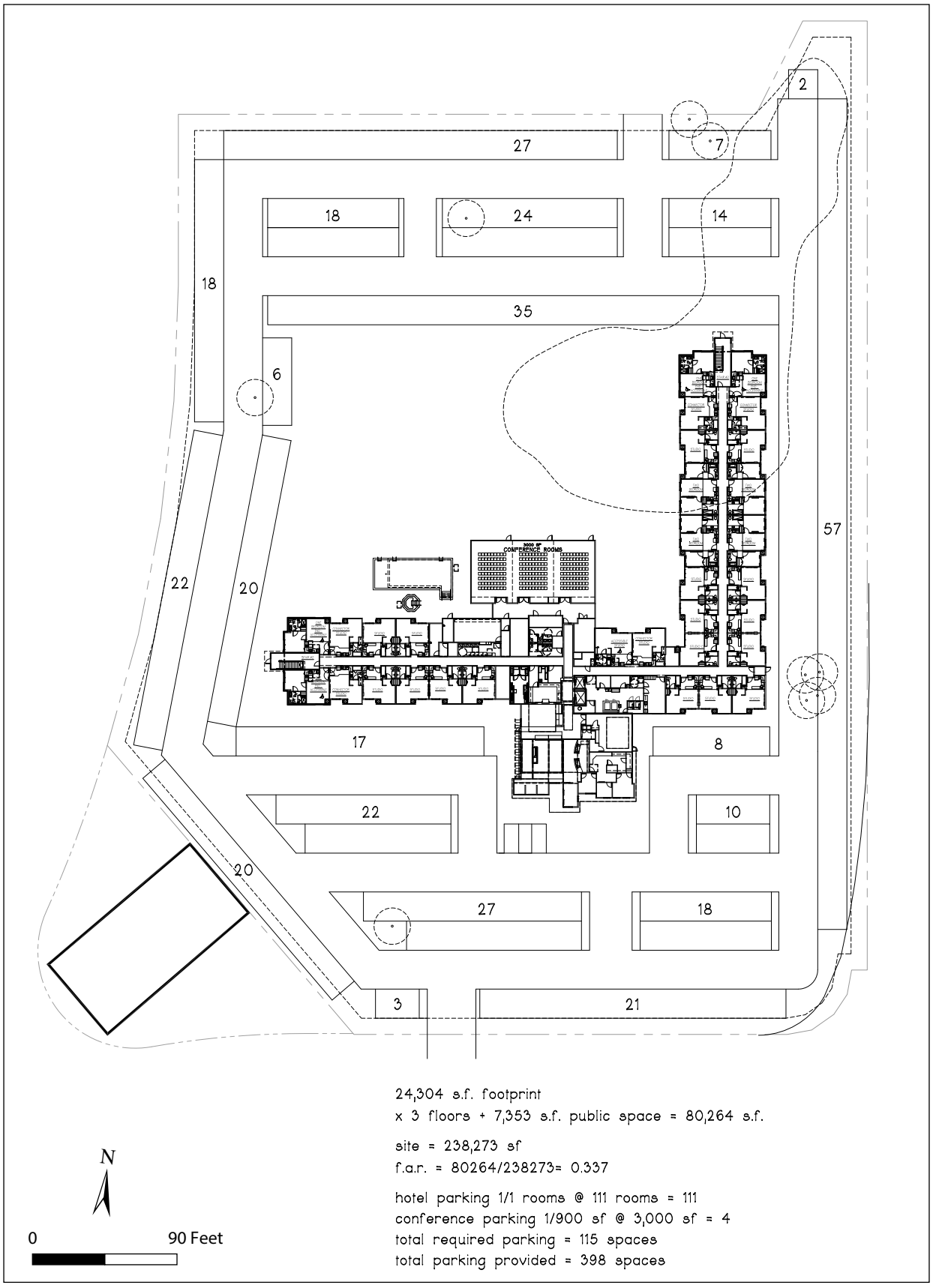


Figure 5-2

SOURCE: Reneson Hotels, Inc. 2014

ALTERNATIVE 3: ALTERNATIVE WITH LIMIT OF 0.34 FAR

This alternative would not meet the project objectives related to the number of hotel rooms for both short-term and long-term accommodations, meeting the market demand and providing economic stability to the project. However, it would meet the objectives as related to maximizing energy efficiency; providing recreational facilities; providing conference space; providing improved circulation; increasing water quality; serving as a community gathering space during emergencies; minimizing visual intrusion on adjacent residential neighborhood; and eliminating the pond for a variety of reasons.

5.2 IMPACTS OF ALTERNATIVES

This section summarizes the impacts of each alternative as compared to the proposed project. When impacts are similar to the proposed project, this is called out. A comparison of the alternatives to the proposed project is provided in **Table 5-1**.

ALTERNATIVE 1: NO PROJECT

Aesthetics

This alternative would leave the site unchanged. No additions to building height would occur and the image of the site from nearby roads such as Madera Boulevard and Tamal Vista Boulevard would remain unchanged. No trees would be removed as would occur with the proposed project, and no new landscaping would occur on the site. No changes to views across the site from off-site locations would occur under this alternative.

Air Quality

No demolition of buildings or construction of new structures would occur under this alternative. Therefore, there would be no criteria pollutant emissions related to construction activity and the project's mitigated-to-less-than-significant construction period impacts would be eliminated under this alternative. There would be no new operational emissions, and existing air emissions would continue.

Biological Resources

The alternative would avoid the significant impacts of the project associated with filling of the proposed pond and removal of trees of regulated size under Chapter 15.50 of the Town's Municipal Code. Potential adverse impacts on nesting birds and the remote possibility of disturbance to roosting bats would also be avoided under this alternative. Therefore, the project's impacts would be avoided under this alternative.

There remains a possibility that the existing pond could be modified under this alternative to improve its water quality, aesthetic, and habitat values. This would require further detailed study, but could include a number of modifications to the existing bank configuration and improved management of water levels and circulation. Increasing water circulation and aeration during the warmer months when anaerobic conditions develop as a result of poor water quality and higher water temperatures could help address the concerns about odor and aesthetic problems. With proper management and controls, options to be explored to improve water quality and circulation

TABLE 5-1 COMPARISON OF IMPACTS OF PROJECT ALTERNATIVES (AFTER MITIGATION)

Environmental Issue Area	PP Proposed Project	ALT 1 No Project	ALT 2 Retention of Pond	ALT 3 FAR of 0.34
Aesthetics	LTS	LTS-	LTS+	LTS-
Air Quality	LTS	LTS-	LTS	LTS
Biological Resources	LTS	LTS-	LTS-	LTS+
Cultural Resources	LTS	LTS-	LTS-	LTS
Geology and Soils	LTS	LTS-	LTS	LTS
Greenhouse Gas Emissions	LTS	LTS-	LTS	LTS
Hazards and Hazardous Materials	LTS	LTS-	LTS	LTS
Hydrology and Water Quality	LTS	LTS-	LTS	LTS-
Land Use and Planning	LTS	LTS-	LTS-	LTS-
Noise	LTS	LTS-	LTS+	LTS-
Public Services	LTS	LTS	LTS	LTS
Transportation/Traffic	LTS	LTS-	LTS	LTS
Utilities and Service Systems	LTS	LTS	LTS	LTS
Energy	LTS	LTS	LTS	LTS

Notes: PP = Proposed Project
ALT 1 = No Project Alternative
ALT 2 = Alternative with Retention of the Pond and FAR of 0.52
ALT 3 = Alternative with FAR of 0.34
+ = Greater adverse impact than proposed project
- = Lesser adverse impact than proposed project
FAR = Floor Area Ratio
Source: A. Skewes-Cox, 2014.

include using the existing culvert with slide gate to the tidally influenced ditch along the west side of Highway 101 and the culvert to Lagoon No. 1 for improved water circulation, and use of spray fountains in the pond to improve aeration. Reconfiguring the steeply sided banks around the pond to create a shallow terrace would allow for establishing native marshland vegetation around the entire feature, improving existing wildlife habitat and aesthetic values, and reducing the risk posed to visitors from the steep banks. The perimeter of the pond could be revegetated with native marsh and upland plant species to further improve the existing limited habitat values. Any modifications to jurisdictional waters would require appropriate authorizations from regulatory agencies, including the U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), and

California Department of Fish and Wildlife (CDFW). However, this would be a relatively simple process given the improvements would greatly improve existing habitat functions and values, and could be designed as a habitat improvement and restoration program.

Cultural Resources

Impacts of this alternative on built-environment historical resources would be comparable to those of the project because this alternative would not cause a substantial adverse change in the significance of a resource that is listed in, or eligible for listing in, the California Register of Historical Resources.

No ground-disturbing activities would occur under this alternative. Therefore, there would be no potential to affect archaeological resources, paleontological resources, or human remains interred outside of formal cemeteries. Thus, the proposed project's impacts on cultural resources would be eliminated under this alternative.

Geology and Soils

No new structures would be built under this alternative. Therefore, there would be no potentially significant impacts created related to seismic and geologic hazards under this alternative, including hazards related to ground shaking, seismic-related ground failure, lateral spreading, slope instability, and differential and total settlement. Therefore, the project's impacts would be avoided under this alternative.

Greenhouse Gas Emissions

No demolition of buildings or construction of new structures would occur under this alternative. Therefore, there would be no greenhouse gas emissions related to construction activity. There would be no new operational greenhouse gas emissions, and existing emissions of greenhouse gases would continue.

Hazards and Hazardous Materials

No demolition of buildings would occur under this alternative. Therefore, there would be no potentially significant impacts related to emissions of lead, asbestos, or other hazardous materials during building demolition under this alternative, and no potential for these hazardous materials to affect nearby hazardous receptors, including schools. Therefore, the project's impacts would be avoided under this alternative.

Hydrology and Water Quality

No new structures would be built under this alternative, and therefore, no effects on stormwater quality related to construction or operation of the project would occur. There would also be no new potential impacts related to flood hazards created. Therefore, the project's potential hydrology and water quality impacts would be avoided under this alternative.

Land Use and Planning

The No Project Alternative would not require a General Plan amendment or rezoning for the project site. No changes would occur in the land uses at the site; no potential conflicts with General Plan policies would occur.

Noise

The No Project Alternative would leave the site in an unchanged condition from its existing use. There would be no noise impact due to project construction activities or operations above existing conditions, as no changes to the buildings, the daily activities, and the outdoor use area would occur.

Public Services

Impacts of this alternative would be comparable to those of the project because this alternative would not create a need for new or physically altered fire stations or police facilities, schools, or recreational facilities. The recreational facilities proposed by the project would not be built.

Transportation/Traffic

Under this alternative the site would not add hotel rooms compared to current conditions, and would therefore not increase vehicle trips, including vehicle turning movements into the site's driveways. The alternative also would not increase pedestrian trips to or across Madera Boulevard and Tamal Vista Boulevard. No construction would occur, thus no construction-related vehicle trips would result.

Similar to project conditions, however, the sidewalk abutting the project site along Tamal Vista Boulevard would continue to have cross-slopes and obstructions that are not compliant with ADA standards (see Mitigation Measure TRAFFIC-3).

Utilities and Service Systems

Impacts of this alternative would be comparable to those of the project because the alternative 1) would not require the construction of new water treatment facilities or expansion of existing facilities, 2) would not require new or expanded water entitlements, 3) would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, 4) would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, 5) would not exceed landfill capacity, and 6) would not conflict with federal, state, or local statutes and regulations related to solid waste.

Energy

No change in energy demand would occur under the No Project Alternative. Impacts of this alternative would be comparable to those of the project because the alternative 1) would not require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity, and 2) would not conflict with applicable energy efficiency policies or standards.

ALTERNATIVE 2: ALTERNATIVE WITH RETENTION OF THE POND AND FAR OF 0.52 (147-ROOM HOTEL)

Aesthetics

While detailed landscape plans have not been identified for this alternative, it is assumed that similar new landscaping could be provided along the western edge of the site adjacent to Tamal Vista Boulevard to partially screen the new building from view. However, this entire side of the building would be three stories in height, resulting in a stronger visual contrast to the single-story homes to the east[2]. Due to the retention of the pond under this alternative, the site open space areas would be limited primarily to the pond area (see Figure 5-1). No openings in the building façade along Tamal Vista Boulevard would occur, resulting in a more massive structure from this viewpoint location.

Extensive areas of surface parking are shown on the south side of the building (see Figure 5-1). It is assumed that landscaping of this parking area could be completed to partially screen the cars from the view from Madera Boulevard to reduce visual impacts to less than significant.

Air Quality

Construction Emissions

Under this alternative, the hotel would include 147 rooms in a three-story building compared with 187 rooms under the proposed project. However, construction impacts of this alternative would be comparable to those of the project because the construction schedule and proposed construction equipment list would remain the same under this alternative. Because Alternative 2 would not involve filling of the pond, it is estimated by the project applicant that 9,000 less cubic yards (CY) of soil import would be required, for a total of 12,403 CY. CalEEMod was used to predict construction emissions under Alternative 2 using the same methodology as the proposed project, except with 12,403 CY of soil import input to the model. **Table 5-2** shows average daily construction emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project. As indicated in Table 5-2, predicted project emissions would not exceed the BAAQMD significance thresholds. The impact associated with construction-period exhaust emissions is, therefore, considered *less than significant*. CalEEMod input and output worksheets are provided in **Appendix E.** Construction-period mitigation would still be necessary to control fugitive dust and the mitigation measure for the proposed project would reduce potential construction impacts for this alternative to a less-than-significant level.

Dispersion modeling was conducted using the same methodology as under the proposed project with Alternative 2 $PM_{2.5}$ exhaust emissions (assumed to be diesel particulate matter) input to the ISCST3 model. Results of modeling indicate that the maximum incremental residential child cancer risk at the MEI receptor would be 6.1 in 1 million and the residential adult incremental cancer risk would be 0.3 on 1 million, 0.27 µg/m^3 $PM_{2.5}$ concentration, and 0.011 HI, the same results as under the proposed project, representing a less-than-significant construction health risk impact.

[2] It should be noted that this alternative could be revised to place the higher portions of the building closer to the highway.

TABLE 5-2 ALTERNATIVE 2: PROJECT CONSTRUCTION EXHAUST EMISSIONS

	ROG	NO_X	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Total Emissions (tons)	1.14	3.55	0.17	0.16
Average Emissions (pounds/day) based on 330 construction days	6.9	21.5	1.0	1.0
BAAQMD Thresholds (pounds/day)	54	54	82	54
Exceed Threshold?	No	No	No	No

Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less, BAAQMD = Bay Area Air Quality Management District

Operational Emissions

Due to the project size, operational-period emissions would be *less than significant*. In its latest update to the CEQA Air Quality Guidelines, BAAQMD identifies screening criteria for the sizes of land use projects that could result in significant air pollutant emissions. For operational impacts, the screening project size is identified at 489 rooms. Hotel projects of a smaller size would be expected to have less-than-significant impacts with respect to operational-period emissions. Since the project would have a total of 147 hotel rooms, it is concluded that emissions would be below the BAAQMD significance thresholds for the operational period.

Biological Resources

The alternative would avoid the significant impacts of the project associated with filling of the proposed pond and removal of many of the trees of regulated size under Chapter 15.50 of the Town's Municipal Code. Potential adverse impacts on nesting birds and the remote possibility of disturbance to roosting bats in the existing structures could still occur under this alternative but would be mitigated to less-than-significant levels with implementation of required mitigation. Compliance with Chapter 15.50 of the Municipal Code would still be required to address trees of a regulated size and species that would still have to be removed under this alternative. However, implementation of the relevant mitigation measures would reduce potentially significant impacts to a less-than-significant level under this alternative.

Retaining the existing pond and establishing a minimum 20-foot-wide buffer around this feature would avoid the significant impacts associated with filling of the 0.64-acre of jurisdictional waters and would allow for substantial improvement to its current condition to address odor, aesthetic, and safety concerns and improve existing wildlife habitat values as well. As with the No Project Alternative, this would require further detailed study but could include a number of modifications to the existing bank configuration and improved management of water levels and circulation. In addition, the buffer zone created under this alternative would allow for additional native enhancement plantings around this feature not available under the No Project Alternative. Increasing water circulation and aeration during the warmer months when anaerobic conditions develop as a result of poor water quality and higher water temperatures could help address the

concerns about odor and aesthetic problems. With proper management and controls, options to be explored to improve water quality and circulation include using the existing culvert with slide gate to the tidally influenced ditch along the west side of Highway 101 and the culvert to Lagoon No. 1 for improved water circulation, and using spray fountains in the pond to improve aeration. Reconfiguring the steeply sided banks around the pond to create a shallow terrace would allow for establishing native marshland vegetation around the entire feature, improving existing wildlife habitat and aesthetic values, and reducing the risk posed to visitors from the steep banks. The perimeter of the pond could be revegetated with native marsh and upland plant species to further improve the existing limited habitat values, including substantial plantings in the upland 20-foot buffer and adjacent areas along the cross-site roadway in this alternative. Any modifications to jurisdictional waters would require appropriate authorizations from regulatory agencies, including the Corps, RWQCB, and CDFW. This would be a relatively simple process in comparison to the proposed project, however, given that the improvements would greatly improve existing habitat functions and values and could be designed as a habitat improvement and restoration program.

Cultural Resources

Impacts of this alternative on built-environment historical resources would be comparable to those of the project because this alternative would not cause a substantial adverse change in the significance of a resource that is listed in, or eligible for listing in, the California Register of Historical Resources.

Impacts of this alternative on archaeological resources, paleontological resources, and human remains interred outside of formal cemeteries would be comparable to those of the project because ground-disturbing activities have the potential to unearth these resources. The impacts to these resources would be less than significant with mitigation, similar to the project. However, with retention of the pond, less area of the site would be disturbed, which could slightly reduce the potential to disturb cultural resources.

Geology and Soils

Impacts related to geology and soils would be comparable to those of the proposed project, as new buildings would be developed at the site that would be subject to potentially significant seismic and geotechnical hazards. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

Greenhouse Gas Emissions

Construction Emissions

Under this alternative, the hotel would include 147 rooms in a three-story building compared with 187 rooms under the proposed project. However, construction impacts of this alternative would be comparable to those of the project because the construction schedule and proposed construction equipment list would remain the same under this alternative. Because Alternative 2 would not involve filling of the pond, it is estimated by the project applicant that 9,000 less cubic yards (CY) of soil import would be required, for a total of 12,403 CY. CalEEMod was used to predict construction emissions under Alternative 2 using the same methodology as the proposed project, except with 12,403 CY of soil import input to the model. Total construction CO_2e emissions were calculated to

be 566 MT of CO_2e and construction GHG emissions under this alternative and would remain less than significant.

Operational Emissions

Operational GHG emissions were computed for this alternative using CalEEMod and project trip rates supplied by the project traffic consultant. The proposed project land use was input to CalEEMod as 147 rooms entered as "Hotel" and 257 parking lot spaces. The operational year was 2017 with the same energy usage rates as under the proposed project. **Table 5-3** lists the estimated operational emissions under Alternative 2. As shown in Table 5-3, net project emissions would not exceed the GHG emissions bright-line threshold of 1,100 MT of CO_2e per year. As a result, operational GHG emissions under Alternative 2 would be considered *less than significant*. Modeling output that includes assumptions is provided in **Appendix E**.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials would be comparable to those of the proposed project, as existing buildings would be demolished and lead, asbestos, and other hazardous materials within those buildings could be released. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

While not a specific significance criterion, the potential for a safety hazard associated with retention of the pond would be associated with this alternative. As currently occurs, the hotel has liability for anyone drowning in the pond despite the fact that the Town operates the pond. Without fencing around the pond, this safety hazard could continue. Fencing could be installed at the edge of the pond to reduce this potential hazard.

Hydrology and Water Quality

Impacts related to hydrology and water quality would be comparable to those of the proposed project, as construction and operation of the project would have the potential to affect stormwater quality and the new structures would be subject to potential flooding hazards. Retention of the pond under this alternative would result in a small negative but unquantified effect on water quality, as the pond water becomes increasingly brackish in the summer, resulting in odor complaints. The "Biological Resources" analysis above explains how water quality could be improved. This alternative would increase the FAR from the existing 0.34 to 0.52, with a corresponding increase in impervious surfaces. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

Land Use and Planning

Like the proposed project, this alternative would require a General Plan amendment and rezoning to allow the proposed FAR of 0.52. The potential for conflicts with General Plan policy would be similar to the proposed project. Retention of the pond would result in this alternative meeting more of the policies of the General Plan, especially as related to protection of "other waters of the U.S."

TABLE 5-3 ALTERNATIVE 2 OPERATIONAL GREENHOUSE GAS EMISSIONS

	GHG Emissions (MT of CO2e)	
	Existing (2014)	**Project Operation (2017)**
Area	<1	<1
Energy	385	470
Mobile	499	886
Waste	27	37
Water	7	8
Project Back-Up Generator	-	4
Total Emissions in Metric Tons Per Year	**919**	**1,406**
Net Project Emissions		**487**
BAAQMD Threshold		**1,100**
Project Emissions Exceed Threshold?		*No*

Note: GHG = greenhouse gas, CO_2e = carbon dioxide equivalents, MT = metric tons, BAAQMD = Bay Area Air Quality Management District

Noise

Future Exterior Noise Environment

Based on the orientation of the hotel under Alternative 2 with respect to U.S. Highway 101, the swimming pool and basketball court would have direct line-of-sight to traffic, which is the dominant noise source in the project site vicinity. According to the plans for this alternative, the distance from the swimming pool and basketball court to U.S. Highway 101 would be approximately 200 and 330 feet, respectively. The noise levels at the pool were calculated to be 66 dBA L_{dn}, which exceeds the 65 dBA L_{dn} limit established in the Town of Corte Madera General Plan. The calculated noise levels at the basketball court were 64 dBA L_{dn}, which would not exceed the 65 dBA L_{dn} limit. The noise impact of this alternative would be potentially significant because the General Plan guidelines would be exceeded and mitigation measures would need to be implemented to reduce noise levels to 65 dBA L_{dn}. A 6-foot noise barrier that shields the pool would sufficiently reduce noise levels to comply with the General Plan guidelines.

Future Interior Noise Environment

Under Alternative 2 conditions, perimeter hotel rooms would be exposed to future exterior noise levels ranging from under 60 dBA L_{dn} at rooms adjacent to Madera Boulevard to 67 dBA L_{dn} at the corner hotel rooms nearest U.S. Highway 101. Based on these exterior levels, projected interior noise levels for the proposed Alternative 2 would potentially be as high as 47 dBA L_{dn} assuming standard hotel construction methods with the windows closed. Therefore, this impact would be

potentially significant because interior noise levels would exceed 45 dBA L_{dn}. The southeastern and northeastern corners of the proposed hotel that are nearest to U.S. Highway 101 would require analysis for potential sound-rated construction methods, building façade treatments, and mechanical ventilation systems to maintain interior noise levels at or below acceptable levels. Mitigation Measure NOISE-1 would need to be implemented for Alternative 2.

Project-Generated Traffic Noise and Cumulative Noise

Traffic generated by Alternative 2 would not substantially increase noise levels at noise-sensitive receptors in the vicinity. Traffic volume information at the intersections surrounding the project site for the Alternative 2 design was reviewed to calculate the permanent noise increase attributable to project-generated traffic. Traffic volumes under the "Existing" and "Existing Plus Alternative 2" scenarios were compared to calculate the relative increase in traffic noise. This comparison indicated that Alternative 2 would increase traffic noise by less than 1 dBA L_{dn} at all intersections in the vicinity of the project site. This impact would be less than significant.

Significant cumulative traffic noise impacts are also not anticipated in the project site vicinity under Alternative 2, and this design would not make a "cumulatively considerable" contribution to cumulative traffic noise increases. Cumulative traffic noise increases were calculated by comparing "Cumulative No Project" volumes and "Cumulative Alternative 2" volumes to "Existing" traffic volumes. The traffic noise increase under "Cumulative Alternative 2" conditions was calculated to be less than 3 dBA L_{dn} along Tamal Vista Boulevard, and the difference with and without the Alternative 2 project was calculated to be less than 1 dBA L_{dn}. The traffic noise increase would not be considered substantial, and Alternative 2 would not make a cumulatively considerable contribution to increased noise levels. This would be a less-than-significant impact.

Operational Noise

Alternative 2 would require the same mechanical equipment as the project design, including heating, ventilation, and air conditioning systems. The proposed hotel in the Alternative 2 design would have fewer rooms, and therefore fewer systems would be needed. However, information regarding the number and type of units, locations, size, housing enclosures, and other factors were unknown at the time of this study. The impacts of mechanical equipment noise on nearby noise-sensitive receptors would need to be assessed during the final stage of design. This is a potentially significant impact. Mitigation Measure NOISE-2 would need to be implemented for Alternative 2.

Project Construction Noise and Vibration

The phases of construction, equipment to be used, and total duration for Alternative 2 would be similar to the project design, except that the pond would not be filled. Furthermore, the distance to the nearest noise-sensitive receptor would be the same. Vibration levels due to construction activities for Alternative 2 would be less than 0.3 inches per second Peak Particle Velocity (in/sec PPV) significance threshold at the nearest sensitive receptor, and while construction vibration would at times be perceptible at the receptors, adjacent land uses would not be subjected to excessive vibrations over extended periods. Assuming construction hours would be limited to daytime hours only, this impact would be less than significant.

Noise generated by construction activities for Alternative 2 would temporarily elevate noise levels at adjacent noise-sensitive receptors. On a temporary basis, noise levels are expected to exceed 60 dBA L_{eq} and to be at least 5 dBA L_{eq} above the ambient noise environment. Therefore, construction noise for Alternative 2 would be potentially significant. The same list of best management practices from Mitigation Measure NOISE-3 would need to be incorporated into the project for Alternative 2.

Public Services

Impacts of this alternative would be comparable to those of the project because this alternative would not create a need for new or physically altered fire stations or police facilities, schools, or recreational facilities.

Transportation/Traffic

Impacts of this alternative would be comparable to those of the project since additional vehicle trips and pedestrian trips would be generated, relative to current conditions. As shown in **Table 5-4**, Alternative 2, at full occupancy, would be estimated to generate 1,144 daily (weekday) vehicle trips, 87 AM peak hour vehicle trips, and 94 PM peak hour vehicle trips. When accounting for existing vehicle trips generated by the site, Alternative 2 would be estimated to generate 556 new daily vehicle trips, 45 new AM peak hour vehicle trips, and 44 new PM peak hour vehicle trips.

TABLE 5-4 ESTIMATED VEHICLE TRIP GENERATION FOR ALTERNATIVE 2

		Daily			AM Peak Hour			PM Peak Hour		
Land Use Hotel Type	**ITE Code**	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Residences Inn	#310	4.46	4.46	8.92	0.39	0.28	0.67	0.34	0.36	0.70
SpringHill Suites	#311	3.12	3.12	6.24	0.32	0.16	0.48	0.23	0.32	0.55
	Rooms									
Residence Inn	85	379	379	758	33	24	57	29	31	60
SpringHill Suites	62	193	193	386	20	10	30	14	20	34
Subtotals	**147**	**572**	**572**	**1,144**	**53**	**34**	**87**	**43**	**51**	**94**
Corte Madera Inn	(110)	(294)	(294)	(588)	(16)	(26)	(42)	(32)	(18)	(50)
Difference	**37**	**278**	**278**	**556**	**37**	**8**	**45**	**11**	**33**	**44**

Source: Institute of Transportation Engineers, 2012; Parisi Transportation Consulting, 2014.

Compared to the project, Alternative 2's vehicle trip generation would be about 64 percent of the project's weekday daily trip generation, 66 percent of the project's weekday AM peak hour trip generation, and 64 percent of the project's weekday PM peak hour trip generation.

Alternative 2's contribution of additional traffic to study highway segments, highway ramps, roadway segments, and intersections would be about two-thirds of the project's traffic contribution. Alternative 2's estimated traffic increases to these facilities are provided in the Transportation Appendix F. Similar to project conditions, no significant impacts would result to study highway segments, highway ramps, roadway segments, and intersections.

In Alternative 2 the project would result in increased vehicle turning movements into the site's driveway, increased pedestrian trips to or across Madera Boulevard and Tamal Vista Boulevard, and construction-related traffic would occur (see Mitigation Measures TRAFFIC-1, TRAFFIC-2, and TRAFFIC-4).

Similar to project conditions, the sidewalk abutting the project site along Tamal Vista Boulevard would continue to have cross-slopes and obstructions that are not compliant with ADA standards (see Mitigation Measure TRAFFIC-3).

Utilities and Service Systems

Impacts of this alternative would be comparable to those of the project because the alternative 1) would not require the construction of new water treatment facilities or expansion of existing facilities, 2) would not require new or expanded water entitlements, 3) would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, 4) would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, 5) would not exceed landfill capacity, and 6) would not conflict with federal, state, or local statutes and regulations related to solid waste.

Energy

Impacts of this alternative would be comparable to those of the project because the alternative 1) would not require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity, and 2) would not conflict with applicable energy efficiency policies or standards.

ALTERNATIVE 3: ALTERNATIVE WITH FILLING IN THE POND AND LIMIT OF 0. 34 FAR (111-ROOM HOTEL)

Aesthetics

This alternative would have a much smaller building footprint on the project site (see Figure 5-2). More open space would be provided in the center of the site and views from Tamal Vista Boulevard would be more of the on-site parking and landscaping than of new buildings.

From Madera Boulevard, one would see more parking in close proximity to the roadway, as the building would be set back. Landscape plans have not been developed, but much of the site could have retained tree cover, or new tree cover added where the building would not be located. Like the proposed project, this alternative includes removal of the on-site pond which could be considered a visual amenity for those using the path at the eastern edge of the site.

Air Quality

Construction Emissions

Under this alternative, the hotel would include 111 rooms in a three-story building compared with 187 rooms under the proposed project. However, construction impacts of this alternative would be comparable to those of the project because the construction schedule and proposed construction equipment list would remain the same under this alternative. Construction-period mitigation would still be necessary to control fugitive dust and the mitigation measure for the proposed project would reduce potential construction impacts for this alternative to a less-than-significant level.

Operational Emissions

Due to the project size, operational-period emissions would be *less than significant*. In its latest update to the CEQA Air Quality Guidelines, BAAQMD identifies screening criteria for the sizes of land use projects that could result in significant air pollutant emissions. For operational impacts, the screening project size is identified at 489 rooms. Hotel projects of a smaller size would be expected to have less-than-significant impacts with respect to operational-period emissions. Since the project would have a total of 111 hotel rooms, it is concluded that emissions would be below the BAAQMD significance thresholds for the operational period.

Biological Resources

Impacts of this alternative on biological and wetland resources would be similar to those of the project as proposed. The 0.64-acre of jurisdictional waters associated with the existing pond would be filled and off-site mitigation required, as with the proposed project. Many of the trees of regulated size under Chapter 15.50 of the Town's Municipal Code that would be preserved under the proposed project would actually be removed under this alternative, including the cluster of mature redwoods at the southeast edge of the existing restaurant and scattered trees that would be located within roadways and parking areas. Compliance with Chapter 15.50 of the Municipal Code would still be required to address trees of a regulated size and species that would be removed under this alternative. Potential adverse impacts on nesting birds and the remote possibility of disturbance to roosting bats in the existing structures would also still occur under this alternative, but would be mitigated to less-than-significant levels with implementation of required mitigation. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

Cultural Resources

Impacts of this alternative on built-environment historical resources would be comparable to those of the project because this alternative would not cause a substantial adverse change in the significance of a resource that is listed in, or eligible for listing in, the California Register of Historical Resources.

Impacts of this alternative on archaeological resources, paleontological resources, and human remains interred outside of formal cemeteries would be comparable to those of the project because ground-disturbing activities have the potential to unearth these resources. The impacts on these resources would be less than significant with mitigation, similar to the project.

Geology and Soils

Impacts related to geology and soils would be comparable to those of the proposed project, as new buildings would be developed at the site that would be subject to potentially significant seismic and geotechnical hazards. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

Greenhouse Gas Emissions

Construction Emissions

Under this alternative, the hotel would include 111 rooms in a three-story building compared with 187 rooms under the proposed project. However, construction impacts of this alternative would be comparable to those of the project because the construction schedule and proposed construction equipment list would remain the same under this alternative. Construction GHG emissions under this alternative and would remain less than significant.

Operational Emissions

Operational GHG emissions were computed for this alternative using CalEEMod and project trip rates supplied by the project traffic consultant. The proposed project land use was input to CalEEMod as 111 rooms entered as "Hotel" and 257 parking lot spaces. The operational year was 2017 with the same energy usage rates as under the proposed project. **Table 5-5** lists the estimated operational emissions under Alternative 3. As shown in Table 5-5, net project emissions would not exceed the GHG emissions bright-line threshold of 1,100 MT of CO_2e per year. As a result, operational GHG emissions under Alternative 2 would be considered *less than significant*. Modeling output that includes assumptions is provided in **Appendix E**.

Hazards and Hazardous Materials

Impacts related to hazards and hazardous materials would be comparable to those of the proposed project, as existing buildings would be demolished and lead, asbestos, and other hazardous materials within those buildings could be released. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

Hydrology and Water Quality

Impacts related to stormwater quality during hotel operations would be less than those of the proposed project, as maintaining the FAR at 0.34 would result in a corresponding decrease in the amount of impervious surfaces compared to the project with a 0.54 FAR. Potential stormwater impacts during construction and potential flooding impacts under this alternative would be comparable to the proposed project. The mitigation measures for the proposed project would reduce potential impacts of this alternative to less-than-significant levels.

TABLE 5-5 ALTERNATIVE 3 OPERATIONAL GREENHOUSE GAS EMISSIONS

	GHG Emissions (MT of CO2e)	
	Existing (2014)	**Project Operation (2017)**
Area	<1	<1
Energy	385	470
Mobile	499	669
Waste	27	28
Water	7	6
Project Back-Up Generator	-	4
Total Emissions in Metric Tons Per Year	**919**	**1,178**
Net Project Emissions		**259**
BAAQMD Threshold		**1,100**
Project Emissions Exceed Threshold?		*No*

Note: GHG = greenhouse gas, CO_2e = carbon dioxide equivalents, MT = metric tons, BAAQMD = Bay Area Air Quality Management District

Land Use and Planning

No General Plan amendment would be required for this alternative, as the FAR would remain the same as currently allowed. However, the C-3 zoning is not consistent with the General Plan and thus the C-3 zoning would require an amendment. Compliance with General Plan policies would be similar to the proposed project. This alternative would meet zoning regulations related to parking; however, more parking would be provided than necessary and some parking areas would more appropriately be used for on-site landscaping and recreational amenities.

Noise

Future Exterior Noise Environment

In Alternative 3, the pool area would have a direct line-of-sight to Tamal Vista Boulevard, which is similar to the original project design. This outdoor use area would be shielded from U.S. Highway 101 traffic by the eastern wing of the proposed hotel. The distance from the center line of Tamal Vista Boulevard to the pool area would be approximately 150 feet. The noise levels at the pool were calculated to be less than 60 dBA L_{dn}, which meets the maximum allowable noise level for transient lodging as established in the Town of Corte Madera General Plan. This would be a less-than-significant impact.

Future Interior Noise Environment

As in the project design, the perimeter hotel rooms facing U.S. Highway 101 would be exposed to the highest future exterior noise levels under Alternative 3 conditions. The distance from these rooms to the nearest through lane of U.S. Highway 101 would be approximately 100 to 115 feet. Assuming these distances, the calculated exterior noise levels at the highway-facing hotels rooms would range from 68 to 69 dBA L_{dn}. The rooms facing Madera Boulevard and Tamal Vista Boulevard under Alternative 3 conditions would be less than 60 dBA L_{dn}. Based on these exterior levels, projected interior noise levels for Alternative 3 would potentially be as high as 49 dBA L_{dn} assuming standard construction methods. Therefore, this would be a potentially significant impact. These are the same projected noise levels as the project design and would require the same analysis for potential sound-rated construction methods and building façade treatments to maintain levels at or below acceptable levels. Mitigation Measure NOISE-1 would need to be implemented for Alternative 3 to reduce the impact to a less-than-significant level.

Project-Generated Traffic Noise and Cumulative Noise

Using the same methodology to calculate project-generated traffic noise as was used for the project design and Alternative 2, it was determined that Alternative 3 would not substantially increase noise levels at noise-sensitive receptors in the vicinity. The relative increase in traffic noise from the "Existing" traffic conditions to the "Existing Plus Alternative 3" traffic conditions would be less than 1 dBA L_{dn} at all intersections in the project site vicinity. This impact would be a less-than-significant impact.

As with the project design and Alternative 2, significant cumulative traffic noise impacts are also not anticipated in the project site vicinity under Alternative 3, and this alternative would not make a "cumulatively considerable" contribution to cumulative traffic noise increases. The traffic noise is expected to increase from "Existing" traffic conditions to "Cumulative Alternative 3" conditions by less than 3 dBA L_{dn} along Tamal Vista Boulevard. In comparing this traffic noise increase to the increase projected from "Cumulative" conditions to "Cumulative No Project" conditions, the difference would be less than 1 dBA L_{dn}. The traffic noise increase would not be considered substantial, and Alternative 3 would not make a cumulatively considerable contribution to increased noise levels. This would be a less-than-significant impact.

Operational Noise

Under Alternative 3 conditions, the proposed hotel would have fewer rooms than the project design, suggesting that less mechanical equipment would be necessary. Information regarding the number and type of units, locations, size, housing enclosures, and other factors was not provided at the time of this study. The impacts of mechanical equipment noise on nearby noise-sensitive receptors would need to be assessed during the final stage of project design. This is a potentially significant impact. Mitigation Measure NOISE-2 would need to be implemented for Alternative 3.

Project Construction Noise and Vibration

The phases of construction, equipment to be used, and total duration for Alternative 3 would be similar to the project. However, the amount of construction necessary for Alternative 3 that would be in close proximity to the nearest noise-sensitive receptor would be considerably less, since

there would not be a wing of the hotel adjacent to Tamal Vista Boulevard. This may reduce annoyance for the surrounding noise-sensitive receptors. Vibration levels due to construction activities for Alternative 3 would be less than 0.3 in/sec PPV at the nearest sensitive receptor, and while construction vibration would at times be perceptible at the receptors, adjacent land uses would not be subjected to excessive vibrations over extended periods. Assuming daytime construction, this impact would be less than significant.

Noise generated by construction activities for Alternative 3 would temporarily elevate noise levels at adjacent noise-sensitive receptors. On a temporary basis, noise levels are expected to exceed 60 dBA L_{eq} and to be at least 5 dBA L_{eq} above the ambient noise environment. Therefore, construction noise for Alternative 3 could be potentially significant. The same list of best management practices from Mitigation Measure NOISE-3 would need to be incorporated into the project for Alternative 3.

Public Services

Impacts of this alternative would be comparable to those of the project because this alternative would not create a need for new or physically altered fire stations or police facilities, schools, or recreational facilities.

Transportation/Traffic

Impacts of this alternative would be comparable to those of the project since additional vehicle trips and pedestrian trips would be generated, relative to current conditions. As shown in **Table 5-6**, Alternative 3, at full occupancy, would be estimated to generate 864 daily (weekday) vehicle trips, 66 AM peak hour vehicle trips, and 71 PM peak hour vehicle trips. When accounting for existing vehicle trips generated by the site, Alternative 3 would be estimated to generate 276 new daily vehicle trips, 24 new AM peak hour vehicle trips, and 21 new PM peak hour vehicle trips.

Compared to the project, Alternative 3's vehicle trip generation would be about 32 percent of the project's weekday daily trip generation, 35 percent of the project's weekday AM peak hour trip generation, and 30 percent of the project's weekday PM peak hour trip generation.

Alternative 3's contribution of additional traffic to study highway segments, highway ramps, roadway segments, and intersections would be about one-third of the project's traffic contribution. Alternative 3's estimated traffic increases to these facilities are provided in the Transportation Appendix F. Similar to project conditions, no significant impacts would result to study highway segments, highway ramps, roadway segments, and intersections.

In Alternative 3 the project would result in increased vehicle turning movements into the site's driveway, increased pedestrian trips to or across Madera Boulevard and Tamal Vista Boulevard, and construction-related traffic would occur (see Mitigation Measures TRAFFIC-1, TRAFFIC-2, and TRAFFIC-4).

Similar to project conditions, the sidewalk abutting the project site along Tamal Vista Boulevard would continue to have cross-slopes and obstructions that are not compliant with ADA standards (see Mitigation Measure TRAFFIC-3).

TABLE 5-6 ESTIMATED VEHICLE TRIP GENERATION FOR ALTERNATIVE 3

Land Use		Daily			AM Peak Hour			PM Peak Hour		
Hotel Type	ITE Code	In	Out	Total	In	Out	Total	In	Out	Total
Residences Inn	#310	4.46	4.46	8.92	0.39	0.28	0.67	0.34	0.36	0.70
SpringHill Suites	#311	3.12	3.12	6.24	0.32	0.16	0.48	0.23	0.32	0.55
	Rooms									
Residence Inn	64	285	285	570	25	18	43	22	23	45
SpringHill Suites	47	147	147	294	15	8	23	11	15	26
Subtotals	**111**	**432**	**432**	**864**	**40**	**26**	**66**	**33**	**38**	**71**
Corte Madera Inn	(110)	(294)	(294)	(588)	(16)	(26)	(42)	(32)	(18)	(50)
Difference	**1**	**138**	**138**	**276**	**24**	**0**	**24**	**1**	**20**	**21**

Source: Institute of Transportation Engineers, 2012; Parisi Transportation Consulting, 2014.

Utilities and Service Systems

Impacts of this alternative would be comparable to those of the project because the alternative 1) would not require the construction of new water treatment facilities or expansion of existing facilities, 2) would not require new or expanded water entitlements, 3) would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, 4) would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, 5) would not exceed landfill capacity, and 6) would not conflict with federal, state, or local statutes and regulations related to solid waste.

Energy

Impacts of this alternative would be comparable to those of the project because the alternative 1) would not require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity, and 2) would not conflict with applicable energy efficiency policies or standards.

5.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines require that the "environmentally superior alternative" be identified. If the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

For this project, the No Project Alternative would be the environmentally superior alternative as it would leave the site unchanged from its existing condition and no new impacts would be created.

However, this alternative would not meet the project objectives. In addition, the EIR must also identify another alternative as mentioned above.

Alternative 2: Alternative with Retention of the Pond and FAR of 0.52 (147-room hotel) would be considered the environmentally superior alternative because of the following:

- Alternative 2 would avoid filling the 0.64-acre of jurisdictional waters and could provide for improved aesthetic, safety, and habitat conditions of this feature. This would require further study, but could provide for appropriate water circulation and aeration, reconfiguration of the existing banks to allow for expansion of marshlands for improved natural filtration functions and habitat values, and native marshland and upland plantings to improve wildlife habitat and aesthetic conditions for hotel guests and visitors.
- Alternative 2 would avoid significant impacts associated with removal of trees of regulated size under Chapter 15.50 of the Town's Municipal Code.
- Trip generation would be reduced, as would associated air and greenhouse gas emissions.

REFERENCES

Institute of Transportation Engineers, 2012, *Trip Generation 9th Edition.*

Marks Traffic Data, 2014. *Traffic Counts*.

Town of Corte Madera, 2009. *Circulation Element*.

Town of Corte Madera, 2013. *Parking Regulations.*