

Corte Madera Inn

Alternatives Analysis

Zentner and Zentner

I. INTRODUCTION

A. Purpose

This analysis was completed to examine alternatives to jurisdictional fill for the Corte Madera Inn project in the Town of Corte Madera, Marin County (**Figure 1**). The project proponent, the Reneson Hotel Group, has applied for an individual permit for the fill of approximately 0.64 acres of Section 404 jurisdictional area (a pond), as defined by Section 404 of the Clean Water Act ("Act") and implementing regulations.

Under the terms of the Act, an individual permit also requires the submission of an analysis (also termed the "404 (b)(1)" analysis), which addresses alternatives to the project. Federal regulations state that:

"Except as provided under Section 404(b)(2), no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem so long as the alternative does not have other significant adverse environmental consequences." (40 CFR 230.10a)

These alternatives must examine practicable alternative locations or site designs which reduce or eliminate fill within "special aquatic sites". "Practicability" is defined in the following fashion:

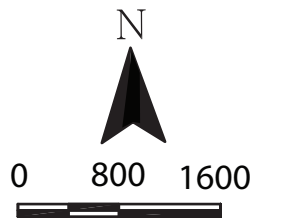


FIGURE 1

LOCATION MAP

REVISIONS	BY

**CORTE MADERA INN
 56 MADERA BOULEVARD
 CORTE MADERA, CALIFORNIA**



SCALE: 1" = 1600 FEET

TOPO SOURCE:
 GOOGLE EARTH

PROJECT NO. 611 CMI

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 611cmi_CorteMadera

DATE: 05.15.2013

“An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purposes.” (40 CFR 230.10(a)(2))

B. Organization

This report is organized into four sections. The first section introduces the purpose and organization of the analysis. The second section describes the project's basic purpose, which identifies the type of project proposed and its requirements. In accordance with US Environmental Protection Agency direction on 404 (b)(1) analyses, this basic purpose must be relatively general and cannot be constrained to pre-select a particular site.

The third section analyzes potential alternative locations to the project. The first part of this section describes the locational criteria that determine the practicability of any off-site alternative. The next part of this section contains the descriptions of alternative sites and examines and compares the practicability of alternative sites in relation to the identified criteria.

Finally, the analysis examines alternative on-site designs that might reduce or eliminate jurisdictional fill, using specific criteria identified through the Federal guidelines.

II. PROJECT DESCRIPTION AND BASIC PURPOSE

A. Project Summary

The Corte Madera Inn project proposes the redevelopment of roughly 5.5 acres of commercial land in central Marin County for construction of a 108-room Residence Inn and a 79-room SpringHill Suites hotel facility.

The site currently contains a 110-unit hotel and a 300-seat capacity restaurant, as well as landscaping with lawns and non-native ornamentals, a swimming pool, an asphalt parking lot, and a 0.64-acre pond, formerly used for stormwater management. The project includes the construction of new facilities on the site by replacing an existing hotel and restaurant with two hotels, landscaping and required parking facilities. Construction of larger, denser facilities will require the fill of the 0.64-acre pond, which is classified as jurisdictional waters, but is not a wetland.

B. Project Setting

1. Location

The Corte Madera Inn is in central Marin County, CA immediately east of Highway 101 about 0.25 miles north of the Madera Boulevard exit of the Highway (see Figure 1). The property is bordered by Tamal Vista Blvd, Madera Blvd, and the Highway. It is surrounded by residential and commercial uses to the north, west, and south sides and Highway 101 on the east side. It is in the 7.5-minute USGS San Rafael quadrangle.

2. Site history

The following, describing the historic landscape of the local area, was taken from the Town's earlier Initial Study regarding the project site environment.

"In the early 1900s, the project site was part of the historic marshlands at the edge of San Francisco Bay. These marshlands extended west from the Bay edge to the vicinity of the existing Town Park and beyond as shown in the photograph below. The area was later diked and portions of the marshlands were replaced with upland fill.

The Town's lagoons and the pond were built in the 50's as a means of controlling storm water runoff before the waters were released to the San Francisco Bay. Subsequently, the drainage system was upgraded with pumps and the project pond became superfluous for flood control purposes. The larger lagoons, referred to as Lagoon No. 1 and Lagoon No. 2, continued to be used for flood control purposes and retention of storm waters."

The Reneson Group Hotel Group previously sought an Individual Permit for the project to expand the hotel and fill the pond in 1985. In 1987, the Town determined that the pond was no longer needed for storm drainage purposes and the Town (through its Flood Control Board) approved filling of the pond by the Inn. The proposed project was under review by the Corps of Engineers (Corps) and Regional Water Quality Control Board (RWQCB) at the time but a local building moratorium was declared prior to final Town, Corps or RWQCB approval and the project was withdrawn. This moratorium is no longer in effect.

3. Site ecology

The Corte Madera Inn grounds are dominated by lawns and a variety of non-native trees and shrubs, typical of a hotel. The Pond is dominated by open water but includes a fringe of mostly non-native vegetation such as pines, oleander, and pampas grass. However, salt grass (*Distichlis spicata*) does occur along a portion of one edge.

The on-site pond banks are relatively steep and range from +5 (all elevations are NGVD) to -2 with 3:1 (vertical to horizontal) slopes common. The depth of the pond varies somewhat but it is generally at -6 to -8 with pond slopes at 2:1 or steeper. The pond receives water from: (1) a 30" gravity-fed pipe from Lagoon #1; and (2) on-site drainage. The water level fluctuates seasonally. In the past, water levels were held at -2 in the winter and spring and then raised to +1 weekly to monthly in the summer and fall (Wetland Research Associates 1985).

Water quality in the pond is poor. The water sources are generally of relatively low quality and the lack of circulation in the pond concentrates pollutants. Wetland Research Associates (ibid) sampled the pond sediments and found only a few worms and polychetes, indicative of poor water quality. They concluded that the invertebrate "fauna were very sparse compared to nearby tidal marshes" (p.4). The water column and bottom sediments were sampled again in April 2000 and no invertebrates were found in the water column and only worms were observed in the sediment.

Wildlife use of the pond and larger project site is highly limited. Zentner and Zentner completed recent bird surveys between July of 2013 and February of 2014 of the Inn pond and the nearby Corte Madera Ecological Reserve. Monthly bird surveys were also completed in the past, from November 1999 through October 2000 and from September 2001 to April 2002. Results from the 2013 bird surveys are summarized in Table 1.

Table 1
Bird Use for the Corte Madera Inn Pond and the Corte Madera Ecological Reserve

Date	Inn Pond		Reserve Total Numbers	
	Upland Birds	Wetland Birds	Upland Birds	Wetland Birds
7/23/13	2	2	1	128
8/23/13	1	0	0	9
9/12/13	3	0	1	41
10/14/13	4	0	1	58
11/13/13	4	0	2	87
12/16/13	1	0	2	211
1/15/14	6	0	8	309
2/12/14	7	0	2	248
Totals	28	2	17	1,091

Bird surveys from 1999 through 2002 showed similar results: the Inn pond hosts few birds and these are almost all upland birds, not water-dependent species.

4. Jurisdictional waters

A delineation of jurisdictional waters of the US under Section 404 of the Act was completed by Zentner and Zentner in May of 2013 and approved by the Corps in August 2014 (**Figure 2**). As defined in Section 404 and its implementing regulations "waters of the U.S." include coastal waters, rivers, streams (including intermittent streams), lakes, ponds, and wetlands (see generally 33 CFR Part 328). Any discharge of fill or dredged material into waters of the U.S. is subject to regulation by the Corps under Section 404 of the Act.

The Corte Madera pond is not a wetland, but it is a jurisdictional water under Section 404 of the CWA and is defined as an "Other Water". The Corps also regulates "other waters tributary to waters of the U.S.". Boundaries between uplands and other waters are determined based on water elevations and geomorphic features. In freshwater conditions, the boundary between uplands and other waters is the ordinary high water mark which is roughly equivalent to the mean annual flood line. In tidal conditions, the boundary is set by the high tide line, roughly equivalent to mean high water. In this case, due to the freshwater dominance and the manipulation of water levels for drainage purposes, the boundary is set by the ordinary high water mark as expressed through the vegetation and geomorphic form of the pond.

The pond is jurisdictional at approximately 1.0 ft NGVD, the ordinary high water mark (OHW) the elevation maintained by the City during spring and summer and comprises approximately 0.64 acres at this elevation. As noted above, the pond is not a wetland under the Corps' definition due to the lack of wetland vegetation but is jurisdictional as "other waters of the U.S."

5. Project Impact

The proposed project will fill the entire pond in order to redevelop the existing hotel, restaurant, and parking lot. Direct impacts include the loss of the 0.64-acre pond and associated upland. Due to the relative isolation of the site and pond, there are no identified indirect impacts.

6. Project Mitigation

Mitigation credits for project impacts were previously purchased at the Burdell Ranch Wetland Conservation Bank. The bank is an approved mitigation instrument for mitigation requirements. This project site is within the service area of the bank which includes all of Marin County, exclusive of any areas west or south of Highway 1. At the Burdell Ranch Mitigation Bank, 1.2 acres was purchased to mitigate for the fill of the pond.

FIGURE 2
SECTION 404

JURISDICTIONAL
DELINEATION

REVISIONS	BY
05.07.13	SM

CORTE MADERA INN
56 MADERA BOULEVARD
CORTE MADERA, CALIFORNIA



0 20' 40'

SCALE: 1" = 40'

TOPO SOURCE:
GOOGLE EARTH

PROJECT NO. 611

FILE:\D:\PROJECTS\600-700\
611 cmi_CorteMadera

DATE: 05.07.2013



SECTION 404 JURISDICTIONAL AREAS

HABITAT TYPE	ACRES
A. WATERS OF THE U.S.	0.64
	ACRES
TOTAL	0.64

DISCLAIMER:

This map exhibits conditions on the site at the time of completion of the delineation. For various reasons, conditions on a site may change, which may affect site wetland boundaries. Delineation maps generally expire five years after approval by the U.S. Army Corps of Engineers (Corps). Because regulations governing delineations are subject to change, this map should be reviewed by a qualified wetland consultant to ensure accuracy if not submitted to the Corps within six (6) months of preparation.

Field Work By: Zentner and Zentner, 05.07.13

LEGEND

- A WATERS OF THE U.S.
- B SCATTERED WETLAND VEGETATION
- PROJECT BOUNDARY (+0.0)
- SAMPLE POINTS

C. Basic Purpose

The Basic Purpose of this project is to develop a viable hotel complex capable of meeting the demand for central Marin hotel space.

D. Project Demand

An extensive study of the market demand for a new hotel on the subject site was completed by PKF Consulting in March 2013 (**Attachment A**). The study considered the current demand at the existing Corte Madera Inn and other unfulfilled demand in the market.

PKF noted that the 110-room Corte Madera Inn has enjoyed an occupancy market penetration above its fair share (105 percent in 2012) due largely to a favorable location. This existing demand would transfer to a new similar sized facility. In addition, PKF concludes that there is market demand for an upper tier extended-stay hotel. Extended-stay hotels include kitchens and other amenities targeting guests typically staying 5-30 days. The extended-stay hotel would satisfy demand not currently fulfilled by the market. PKF recommends the development of two approximately 100-room hotels on the site--one to satisfy demand currently served by the Corte Madera Inn and a second one to satisfy demand for extended-stay hotel rooms. In any case, PKF concluded that sufficient demand exists for approximately 200 rooms.

III. OFF-SITE ALTERNATIVES ANALYSIS

A. Introduction and Purpose

The purpose of the off-site alternatives analysis is to determine whether there are locations other than the proposed site where the project basic purpose could be practicably achieved while eliminating or reducing impacts to waters of the United States.

B. Market Area

The market area of a project is the geographic region where sales and sale rates for similar products would be comparable. For example, two hotel rooms in different hotels but with similar characteristics would have a similar price and occupancy rate within a market area. Outside the market area, these prices and rates would be dissimilar, resulting in non-comparable alternatives.

For the purposes of this assessment, the market area is the area in Marin County from Sausalito at the County's southern end to and including the City of the San Rafael. There is no commercially-zoned land of any appreciable size outside the 101 corridor in this area and alternative sites well away from the corridor would have neither the zoning nor the services to be practicable alternatives; accordingly, the market area is centered along 101 within this region.

The Corte Madera Inn is approximately 15 miles from downtown San Francisco, 6 miles from Sausalito, 16 miles from Stinson Beach and serves and is accessible to an appreciable population within southern and central Marin County. An alternate site would ideally be similarly convenient. Lands north of the City of San Rafael (the Cities of Novato and Petaluma) and further north would be too distant from San Francisco or the south Marin beaches. Lands within the City of San Francisco would be much more costly and subject to the City's urban issues. Additional analysis criteria, discussed below, will also be taken into account when vetting potential alternative sites.

C. Analysis Criteria

1. Environmental constraints

Sites that have more significant environmental constraints than the proposed project site are not practicable alternatives. Environmental constraints include a greater extent of Sections 404 and/or 10 waters, endangered species or their habitats, heritage trees or other natural habitats, and similar constraints. These constraints provide for significantly greater costs and technological limitations than the proposed project site and that would exclude these sites from further consideration.

2. Physical conditions and size

Sites where the physical conditions pose a significant constraint to development are considered not practicable; similarly, sites that are too small to put approximately 200 hotel rooms would also be inconsistent with the basic purpose. These physical conditions include steep slopes (30 percent or greater), location within the FEMA 100-year floodplain, severe soil instability, and similar conditions. These conditions constitute significantly greater cost and technological constraints than the proposed project site hosts and that would exclude these sites from further consideration.

3. Infrastructure requirements

An alternative site must be reasonably close to existing infrastructure and services that can adequately service the proposed project and thus avoid costly infrastructure extensions and the attendant delays. An alternative site may not be practicable if it is sufficiently isolated from nearby development and associated utilities, including roadways.

4. Consistent land use

Current or near-future General Plan designations for alternative sites must be consistent with the proposed project land uses. The Corps has recognized in its review of 404(b)(1) analyses that alternative sites must be consistent with local zoning/General Plan requirements. Alternatively, if the existing land use designation for an alternative site is not consistent, the local jurisdiction must indicate that an amendment to bring it into conformance is practicable. For purposes of this analysis, designations that allow moderate to high density residential uses are considered consistent with the project development. For other designations (e.g., agricultural, very low density residential), the local jurisdiction must indicate that a change to allow the proposed project is practicable. Sites with inconsistent land use designations that are not likely to be modified by the City (e.g., open space) are not considered practicable.

5. Availability/Land Costs

Alternative sites not presently owned by the applicant that could reasonably be obtained and used to fulfill the project purpose are considered for this analysis. Conversely, alternative sites that cannot be reasonably obtained and used to fulfill the project purpose are not practicable alternatives. Properties for which development applications have been submitted, or are already approved, are not practicable. For example, purchasing or otherwise gaining a controlling interest in a site where the owner has already initiated development approvals would pose significant cost and logistics constraints. Lands subject to complex multiple ownership are similarly considered unavailable, as it is extremely difficult to acquire large tracts under multiple ownership.

D. Evaluation of Practicability

Eight sites (not including the project site) were identified as potential project sites based on reviews of the Market Area and discussions with local planners and realtors (**Figures 3 through 6**). These sites were then assessed according to the criteria described above. There were no sites south of Corte Madera, a result of the dense development pattern and extent of marshlands, and very few other sites. The results of this survey are described below in **Table 2**.

Table 2
Alternative Site Review Summary

Site #	Size (ac)	City	General Plan Designation
1	13.6	Corte Madera	Parks, Open Space and Natural Habitat
2	13.9	Corte Madera	Parks, Open Space and Natural Habitat
3	6.0	Corte Madera	Parks, Open Space and Natural Habitat
4	5.3	Corte Madera	Office
5	11.0	Larkspur	Planned Development
6	3.7	San Rafael	General Commercial
7	8.8	San Rafael	Park
8	6.5	San Rafael	Residential Low Density

1. *Alternative Site 1*

Site 1 is a parcel that is roughly 13.6 acres and located directly adjacent to Highway 101 in southern Corte Madera. Current access to the northern side of the site exists from Meadowsweet Drive approximately 1.0 miles from the Tamalpais Drive exit on HWY 101. The southern edge of the site meets Lomita Drive and HWY 101. Dollar Fire Road runs from the southwest into the western side of the property.

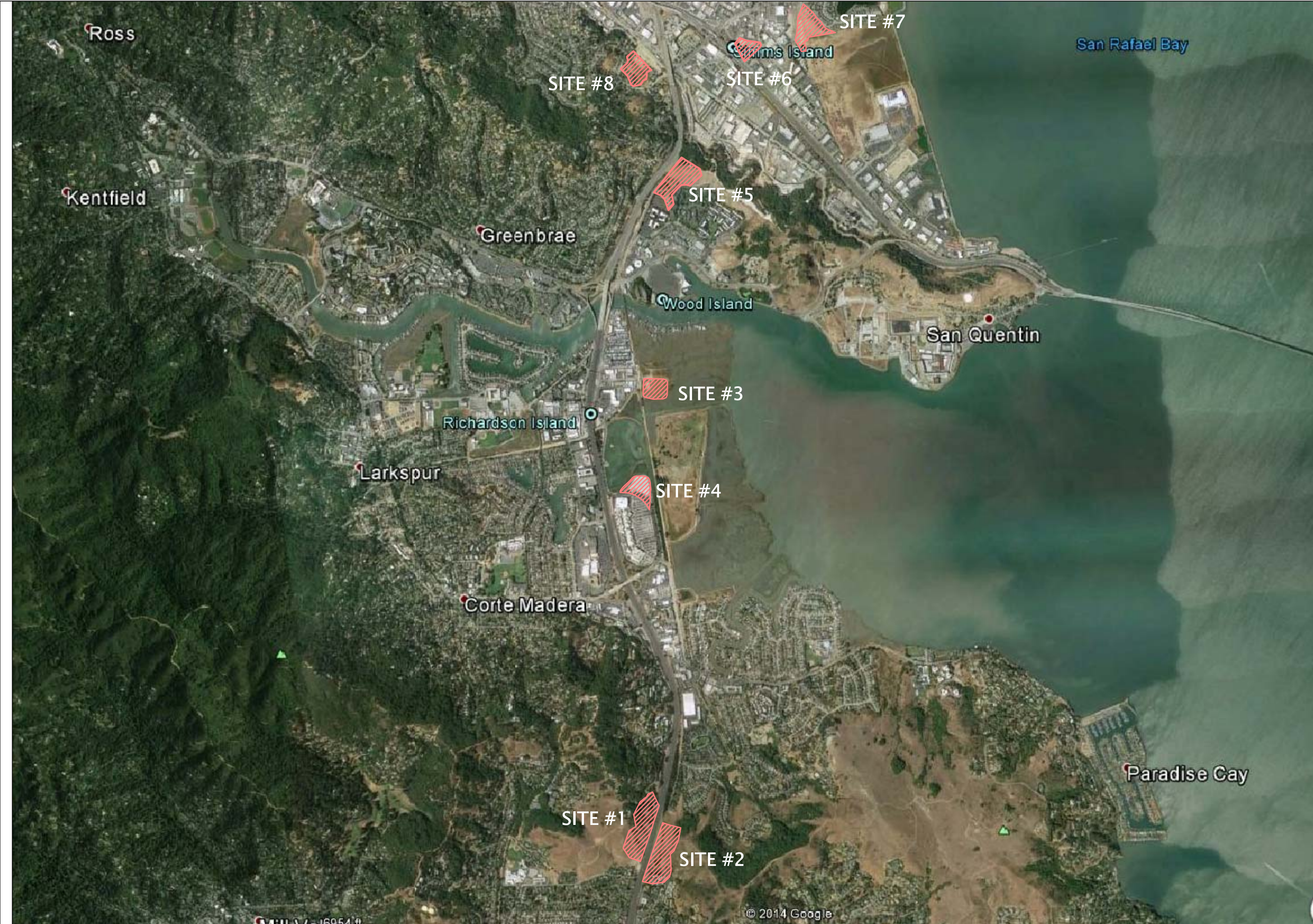
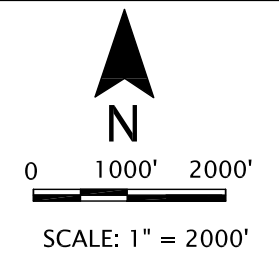


FIGURE 3
 OVERALL
 SITE
 LOCATIONS

1000 CORTE MADERA INN
 CORE MADERA, CA
 MARIN COUNTY



TOPO SOURCE:
PROJECT NO: 1000
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DATE: 09.11.2014

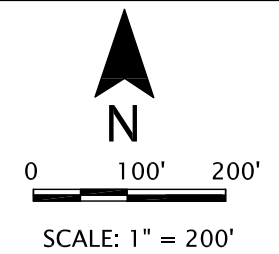


SITE #1
13.7 AC

SITE #2
13.9 AC

FIGURE 4
SITE NUMBERS
1 & 2

1000 CORTE MADERA INN
CORTE MADERA, CA
MARIN COUNTY

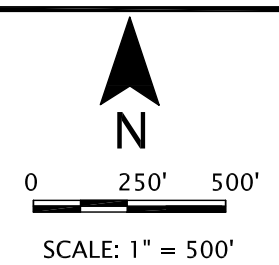


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PROJECT NO: 1000
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DATE: 09.11.2014

FIGURE 5
 SITE NUMBERS
 3 & 4



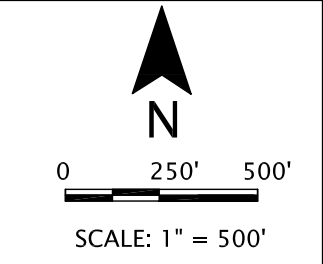
1000 CORTE MADERA INN
CORTE MADERA, CA
MARIN COUNTY



TOPO SOURCE:
PROJECT NO: 1000
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DATE: 09.11.2014

FIGURE 6
 SITE NUMBERS
 5, 6, 7, & 8

**1000 CORTE MADERA INN
 CORE MADERA, CA
 MARIN COUNTY**



TOPO SOURCE:
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 DATE: 09.11.2014



The site consists of relatively steep hillsides with oak woodland and non-native grasslands. No wetlands were seen during the site review. However, this site is near the Ring Mountain Reserve, an area of serpentine soils, that hosts numerous listed plant species. This site also hosts serpentine soils and is likely to host these plants as well.

The site is large enough to host an alternative hotel complex but the site is largely made up of slopes that are greater than 20%.

There is no infrastructure suitable for a commercial development adjacent to the site. Local roadways are too narrow for commercial uses and the sewer and water lines are similarly constrained. The site is zoned for Parks, Open Space and Natural Habitat. There is no evidence that it is available at this time.

This site is not practicable due to numerous constraints, including potential listed species, heritage native trees, limited access, extreme slopes (>20 %), limited infrastructure, and inconsistent zoning. Other open space lands to the west have similar constraints and are part of the Marin Open Space District Alto Bowl lands and, accordingly, not available.

2. *Alternative Site 2*

Site 2 is roughly 13.9 acres and is located directly across HWY 101 from Site 1, on the east side of the freeway. Current access to the site exists from Koch Rd approximately 1.0 miles from the Tamalpais Drive exit on HWY 101.

The site is primarily non-native annual grassland, with infrequent non-native and native shrubs and trees. No wetlands were seen during the site review. However, this site is adjacent to the Ring Mountain Reserve, an area of serpentine soils that hosts numerous listed plant species as noted above. This site also hosts serpentine soils and is likely to host these plants as well.

The site is large enough to host an alternative hotel complex but the site is largely made up of slopes that are greater than 20%.

There is no infrastructure suitable for a commercial development adjacent to the site. Local roadways are too narrow for commercial uses and the sewer and water lines are similarly constrained. The site is zoned for Parks, Open Space and Natural Habitat. There is no evidence that it is available at this time.

Site 2 is not a viable option primarily due to its inconsistent zoning, its adjacency to an Open Space Preserve and it also has similar constraints as site #1. Those include limited accessibility, extreme slopes (>20 %), and limited infrastructure.

3. *Alternative Site 3*

Site 3 is roughly 6.0 acres and is located within the Town of Corte Madera along the eastern border of the Corte Madera Ecological Reserve. Highway 101 is located approximately 0.2 miles to the west of the entrance to the site. Redwood Highway borders the site's southern edge and provides access.

The site is entirely covered with clean, 1-3" gravel with narrow borders of non-native shrubs and weeds and coyote brush (*Baccharis pilularis*). There is a sign on-site that labels the area as an Evacuation Assembly Area. Although the site itself does not appear to host wetlands, it is surrounded on three sides by wetlands. The adjacent marshes are known to host California clapper rails and salt marsh harvest mice, federally-listed species and these may use the site as high tide refugia.

The site is large enough to host an alternative hotel complex.

There site has suitable infrastructure for a commercial development adjacent to the site. Local roadways are relatively large and commercial-grade. Sewer and water lines are available and apparently suitable for commercial development.

The site is zoned for Parks, Open Space and Natural Habitat. There is no evidence that it is available at this time.

Site 3 is not practicable due to the inconsistent zoning, lack of availability and proximate wetlands and habitat by special status species.

4. *Alternative Site 4*

Site 3 is a 5.3-acre parcel located in Corte Madera. The site is located between the Shorebird Marsh to the south and west, the Corte Madera Ecological Reserve to the east, and commercial development to the west. Highway 101 is accessible from the site within approximately 0.3 miles via Industrial Way. There is a small parking lot connected to the property that is currently in use for Ecological Reserve trailhead parking.

The site contains wetlands in pockets, including seasonal wetlands in the center and tidal fringe wetlands on the edges that are also habitat for federally-listed species.

The site is not quite large enough to host an alternative hotel complex assuming it was all uplands. However, given the extent of wetlands that would require avoidance, the size of the developable area would be a constraint.

There is apparently infrastructure suitable for a commercial development adjacent to the site to the west. However, the local roadway is narrow and constrained by the number of other commercial uses along its length.

The site is zoned for Professional and Administrative Offices although it is surrounded by lands zoned for Parks, Open Space and Natural Habitat. This site is currently in the process of being acquired for habitat restoration as part of a larger reserve by local environmental groups; it is not available at this time.

Site 4 is not practicable due to the acquisition by local environmental groups and environmental constraints. Industrial Way, the sole road that leads to the site, is narrow and heavily utilized on both sides by industrial businesses such as automotive garages and storage facilities. The site is surrounded on three sides by a sensitive, protected wetland Preserve and may harbor wetland habitat itself.

5. *Alternative Site 5*

Site 5 is located within the City of Larkspur. The area has HWY 101 to the west, Larkspur Courts high- to medium density residential complex to the south and an old quarry/open space to the northeast. Access is currently limited to the roads of the residential complex.

The site is non-native annual grassland, exposed rock slope, and fragments of native oak woodland and scrubland adjacent to HWY 101. No wetlands or listed species habitats were visible during our reviews.

The site is potentially large enough to host an alternative hotel complex but significantly constrained by both slopes and layout to make siting a hotel complex here not practicable; the site is largely made up of slopes that are greater than 20%.

There is no infrastructure suitable for a commercial development adjacent to the site. Local roadways are too narrow for commercial uses and the sewer and water lines are similarly constrained.

The site is zoned for Planned Development. There is no evidence that it is available at this time.

This site is not practicable due to limited access, size and development constraints and lack of suitable infrastructure.

6. *Alternative Site 6*

Site 6 is located in San Rafael in between Francisco Blvd E, Castro Ave, and Kerner Blvd, less than 0.2 miles from HWY 580. It is approximately 3.7 acres. The adjacent land use is primarily

industrial and associated with construction or automobile industries. The property is graded and level, with gravel covering the majority of it. The edges of the property bordering the sidewalk support some non-native plant species, primarily fennel (*Foeniculum vulgare*).

The site is non-native annual grassland and exposed gravel. No wetlands or listed species habitats were visible during our reviews.

The site is too small to host an alternative hotel complex.

There is infrastructure suitable for a commercial development adjacent to the site. Local roadways are also suitable for commercial development.

The site is zoned for General Commercial. There is no evidence that it is available at this time.

The site is not a practicable alternative as it is too small and is not apparently available.

7. *Alternative Site 7*

Site 7 is located in an industrial area of San Rafael between Bellam Boulevard, Windward Way, and open space. It is roughly 8.8 acres and primarily comprised of graded, non-native annual grassland.

The ground is level in elevation with limited vegetation. There is a fenced off area along Bellam Blvd that appears to contain a drainage channel with wetland vegetation and basins. There are large, overhead powerlines running from north to south along Windward Way.

The site is large enough to host an alternative hotel complex. The wetland and drainage channel portion appear to constrain about 30% of the site, leaving approximately 5.5 acres as uplands.

There is infrastructure suitable for a commercial development adjacent to the site to the southwest. Local roadways are also suitable for commercial development although they may require widening as Bellam Blvd. goes from a divided roadway to a unitary road at the site.

The site is zoned for Parks. There is no evidence that it is available at this time.

The site is not a practicable alternative as the zoning is inconsistent and the local neighborhood of residential development would oppose any commercial development on this site. It is also apparently not available.

8. *Alternative Site 8*

Site 8 is located in San Rafael west of the intersection between Woodland Ave and Bellam Blvd. The site is approximately 6.5 acres. The land is undeveloped and surrounded by residential community along the west and south. Highway 101 runs to the east of the property. Access to the highway is roughly 0.4 miles away.

The habitat on-site is primarily non-native annual grassland, graded gravel, wetland, and native oak woodland. Plant species found in the wetland species include tule (*Scirpus* spp.), cattails (*Typha* spp.), and willows (*Salix* spp.). Two deer were seen on the property during a site visit.

The site may not be large enough to host an alternative hotel complex. The wetland areas appear to constrain about 30% of the site, leaving only approximately 4.8 acres as uplands.

There is no infrastructure suitable for a commercial development adjacent to the site; this is a residential neighborhood. Local roadways are also not suitable for commercial development.

The site is zoned for Low Density Residential. There is no evidence that it is available at this time.

The site is not a practicable alternative as the zoning is inconsistent and the local neighborhood of residential development would oppose any commercial development on this site. As well, commercial infrastructure is not readily available and the site is likely not large enough once the wetlands are avoided.

E. Results

Eight sites (not including the project site) were identified as potential project sites based on reviews of the Market Area and discussions with local planners and realtors. These sites were then assessed according to the criteria described above. None of these sites are practicable alternatives as described above and summarized in **Table 3** below.

**Table 3
Alternative Site Review Results**

Key: NP: Not Practicable; P: Practicable; U: Data Unclear

Site #	Analysis Criteria				
	Environmental	Physical	Infrastructure	Land Use	Available
1	U	NP	NP	NP	U
2	U, probably NP	NP	NP	NP	U
3	U	P	P	NP	NP
4	NP	NP	U	P	NP
5	P	NP	NP	P	U
6	P	NP	P	P	U
7	U, possibly NP	P	U, possibly NP	NP	NP
8	Probably NP	NP	NP	NP	U