

TOWN OF ROSS

# 2023-2031 HOUSING ELEMENT

MAY 19, 2023

FINAL ENVIRONMENTAL IMPACT REPORT

SCH: 2022110593



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# 1 Introduction

In accordance with the California Environmental Quality Act (CEQA), this document provides responses to comments received on the Draft Environmental Impact Report (Draft EIR) SCH No. 2022110593 for the proposed Ross General Plan Housing Element Update (Proposed Project) in the Town of Ross, California, and it includes revisions to the text in the Draft EIR made in response to comments. The Draft EIR identified significant impacts associated with the Proposed Project and examined alternatives and recommended mitigation measures that could avoid or reduce potential impacts.

This document will constitute the Final EIR if the Town Council certifies it as adequate and complete under CEQA.

## Purpose

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As described in Sections 15089 and 15132 of the State CEQA Guidelines, the lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies. Pursuant to CEQA Guidelines Section 15132, a Final EIR must contain the following:

- The Draft EIR or a revision of the Draft;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- Comments and recommendations received on the Draft EIR;
- The response of the Lead Agency to significant environmental points raised in the review process; and
- Any other information added by the Lead Agency.

The EIR is intended to disclose to the Town of Ross decision makers, responsible agencies, organizations, and the general public the potential impacts of implementing the Proposed Project using a program level of analysis. This Final EIR amends and incorporates by reference the Draft EIR, which is bound separately. As required under CEQA, this document includes comments and responses to comments on the Draft EIR, and minor corrections and clarifications to the Draft EIR.

The Final EIR and the Draft EIR are available for review at [https://www.townofross.org/sites/default/files/fileattachments/planning/page/4307/ross\\_eir\\_public\\_review\\_draft\\_031623-2.pdf](https://www.townofross.org/sites/default/files/fileattachments/planning/page/4307/ross_eir_public_review_draft_031623-2.pdf).

## **CEQA Process**

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The Town of Ross is the lead agency for this EIR. According to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a Proposed Project, and to provide the general public with an opportunity to comment on the Draft EIR. The Draft EIR was made available for public review on March 17, 2023. The Draft EIR was distributed to local and State responsible and trustee agencies and the general public was advised of the availability of the Draft EIR through public notice published in the local newspaper and on the Town's website and the project website as required by law.

Copies of all written comments received on the Draft EIR are contained in this document. These comments and responses to these comments are included in Chapter 2 of this Final EIR.

## **Modifications to the Proposed Project**

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Consistent with State law, the Draft Housing Element was submitted to the California Department of Housing and Community Development (HCD) for review on December 13, 2022. Following completion of HCD review on March 13, 2023, the Town revised the Draft Housing Element to address HCD comments. These revisions, described below in greater detail, primarily involved the incorporation of additional supporting information and clarification regarding the implementation of housing programs. Additionally, two sites that had been included in the Draft Housing Element were removed from the housing sites inventory, resulting in a net decrease of in the total projected buildout of the inventory through 2031.

## **Validity of the EIR Analysis for the Modified Project**

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The review process mandated by CEQA is iterative, including multiple opportunities for public comment and for project changes in response to those comments. It is not uncommon for a proposed project to evolve during the EIR process, so that the project presented at the time of the Draft EIR has been revised by the time of the Final EIR. CEQA Guidelines Section 15088.5 addresses this situation, explaining how to evaluate whether changes to the project/plan (and to the Draft EIR's analysis and conclusions) necessitate recirculation of the Draft EIR prior to preparation of a Final EIR.

Under CEQA, recirculation of a Draft EIR is required when there is significant new information about the project or its impacts. Significant new information means disclosure of either a new significant impact, a substantial increase in the severity of an impact (unless mitigation measures are adopted that reduce the impact to a level of insignificance), or a feasible alternative or mitigation measure considerably different from others already analyzed that would clearly lessen significant impacts of the project but that the project proponents decline to adopt. Recirculation is also required if a Draft EIR is so inadequate that meaningful public review and comment was precluded. However, recirculation is not required where the new information added to the EIR merely clarifies, amplifies, or makes insignificant modifications to an adequate EIR.

In the current instance, the edits and additions to the Proposed Project in response to HCD comments do not constitute significant new information pursuant to Section 15088.5 of the CEQA Guidelines. The revisions involve the removal of the St. Anselms Church site (3 moderate income units) and the Ross Post Office site (6 lower income units) from the inventory, together with an increase in the projected number of lower income units at the Civic Center site from six to nine. This would result in a reduction both in the net number of new housing units resulting from Housing Element implementation as well as a reduction in the overall development footprint, since two sites would be removed and one site already included on the inventory would receive 3 additional units. To offset the loss of these units and ensure the inventory has sufficient capacity to meet lower income RHNA obligations with a buffer, two additional programs aimed at incentivizing homeowners to commit to making ADUs/JADUs affordable to lower income households through long term affordability agreements were added. These new programs would not be anticipated to increase the number of ADUs constructed in the planning period, but rather to increase the share of ADUs/JADUs made affordable to lower income households.

The revisions also involve edits to implementing programs to provide additional detail regarding implementation timing and the addition of new programs to ensure consistency with State law, including new laws that came into force in January 2023 after the Draft Housing Element was submitted to HCD. Specifically, implementing Programs 3-A, 3-B, and 3-K were edited to add more specific milestones, dates, and background information. Newly added Program 1-E and revisions to Program 4-I involve actions by the Town to proactively advertise the availability of affordable housing in Ross to prospective residents meeting the relevant income requirements. Program 3-L and Program 3-M involve the revisions to the Zoning Ordinance to define manufactured housing and clarify that employee housing for six or fewer persons are permitted as a type of single-family housing. Program 4-D would revise the definition of “family” in the Zoning Ordinance, while Program 4-G would clarify the specific requirements for denial of an application requesting reasonable accommodation. Program 4-J would require the Town to share the adopted Housing Element with water and sewer providers to grant priority for service allocations to developments that include affordable units, consistent with State law. Program 4-K would require the Town to promote the availability of rental assistance programs to seniors and other renters in Ross at risk of displacement. Given that these additional programs consist of clarification to the Zoning Ordinance or actions the Town will take to advertise housing availability or rental assistance programs, they would not result in new or substantially more severe significant impacts than identified or analyzed in the Draft EIR.

Further, other additions and clarifications to the Proposed Project include additional data and information on the viability of ADU and SB9 housing production to support the projections included in the Draft Housing Element for this type of housing over the planning period; incorporation of background information and data on regional fair housing trends; and inclusion of a table summarizing quantified objectives for the maintenance, preservation, and construction of housing. These revisions merely clarify the content of the Draft Housing Element.

Along with changes to the Proposed Project, two mitigation measures in the Draft EIR were modified in view of feasibility. Mitigation Measure GHG-2, which prohibited natural gas plumbing and appliances in new housing sites, was found infeasible and deleted. This is because the Ninth U.S. Circuit Court of Appeals found that it was an overreach to make this prohibition and not in line with the Energy Policy and Conservation Act. (*California Restaurant Association v. City of*

*Berkeley*, No. 21-16278 (9th Cir. filed Apr. 17, 2023). As such, implementation of the previously proposed Mitigation Measure GHG-2 would be infeasible. Similarly, Mitigation Measure VMT-1 was amended to clarify that the Town has committed to off-street parking reductions in Program 3-B of the Draft Housing Element and to require the provision of at least two bicycles for the use of Town employees and residents of the multifamily housing to be developed on the Civic Center site in order to promote the use of non-motorized transport instead of combustion engine vehicles for short distance trips. The Draft EIR had previously required the provision of a bike share system with at least 10 electric vehicles, which would have been cost prohibitive. With these revisions, the EIR includes all feasible mitigation measures available to avoid or substantially lessen the significant effects of the Proposed Project, pursuant to Section 21002 of the CEQA Guidelines.

Therefore, overall, the edits and additions to the Proposed Project described above, together with the revisions to the Draft EIR detailed in Chapter 3 of this document would not result in new significant or substantially more severe impacts, nor would they require new mitigation measures not already included in the Draft EIR. Consequently recirculation of the Draft EIR is not required.

## Organization

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This document contains the following components:

- **Chapter 1 Introduction.** This chapter discusses the use and organization of the Final EIR.
- **Chapter 2 Public Comments and Responses.** Lists all of the agencies, organizations, and individuals that submitted written comments on the Draft EIR and reproduces all comments. Provides responses to comments on the Draft EIR as well as revisions to the Draft EIR where necessary to clarify or amplify in the order that responses appear. Where such revisions are warranted in response to comments on the Draft EIR, deletions are shown in ~~striketrough~~ and additions are shown underlined in red in the matrix of comments and responses.
- **Chapter 3 Revisions to the Draft EIR.** Provides errata with revisions to the Draft EIR where necessary to clarify or amplify. Revisions are organized by Draft EIR section and by page number. Where such revisions are warranted in response to comments on the Draft EIR, deletions are shown in ~~striketrough~~ and additions are shown underlined in red in the matrix of comments and responses.

## 2 Public Comments and Responses

This chapter contains copies of the comment letters received on the Draft EIR during the public comment period, which began on March 17, 2023 and ended on May 1, 2023, and the State comment period, which began on March 20 and ended on May 3, 2023, as well as responses to comments that pertain to environmental issues and the merits of the analysis in the Draft EIR.

### 2.1 Comments Received

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One comment letter was received during the comment period. The letter is identified by a designator (e.g., “Letter A1”). Comment letters received are listed in **Table 2-1**.

**Table 2-1: Comments Received on the Draft EIR**

<i>Comment Letter</i>	<i>Date</i>	<i>Commenter</i>	<i>Agency/Organization/Individual</i>
A1	May 1, 2023	Thomas Weisel	Individual



Comment Letter: A1

May 1, 2023

**By E-Mail**

Rebecca Markwick, Director of Planning and Building  
Town of Ross  
P.O. Box 320  
Ross, CA 94957  
Email: [rmarkwick@townofross.org](mailto:rmarkwick@townofross.org)

**Re: Draft EIR for Town of Ross 2023-2031 Housing Element Update  
[SCH # 2022110593]**

Dear Ms. Markwick:

Please accept the following comments on the above-referenced draft environmental impact report (DEIR) for the Town of Ross Housing Element Update, submitted on behalf of Ross resident Thomas Weisel.

Consistent with State housing law, the DEIR and proposed Housing Element identify available for housing development in the Town, together with an “inventory of realistic capacity.” (DEIR, p. 2-9; Figure 2.4-1.) The first site identified in the DEIR’s inventory is the 53-acre “Berg Site” on Upper Road. (DEIR, p. 2-13.) Both the DEIR and proposed Housing Element state that under the existing zoning, the currently vacant Berg Site could be developed to accommodate six units of above moderate-income housing. This represents a significant contribution towards achieving the Town’s RHNA allocation of 41 above moderate-income units with a 5-unit buffer.

As the Town is aware, property owners have sought to subdivide and develop the Berg Site for over twenty-five years. An application for a five-lot subdivision was submitted to the Town in 1991. The Town Council certified an EIR, but then denied the project. Applicants submitted a revised plan in 1995, but that too was denied. Subsequent applications for a three-lot subdivision were submitted in 2000, with additional CEQA review occurring in 2002, 2006, and 2014-2017. However, none of these applications was ultimately approved by the Town.

A draft EIR prepared in 2014 for the previously proposed three-lot subdivision identified several significant impacts with respect to biological resources, landslides, and seismic safety that required extensive, technically complex mitigation measures, even as the earlier proposal was for half the number of residential units now described in the current DEIR. The 2014 DEIR disclosed that substantial volumes soil excavation would be required, that over 400 trees would be removed, and that various retaining walls, spread footing foundations, drilled concrete piers, and other engineered solutions would be required to mitigate landslide and seismic safety risks at the site. The 2014 EIR also found significant unavoidable impacts in the areas of aesthetics and noise.<sup>1</sup>

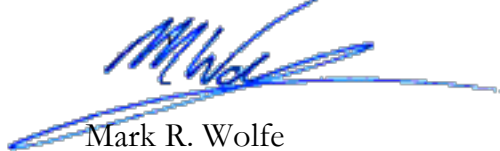
To its credit, the current DEIR acknowledges that special-status species may be present at the Berg Site, that the site is susceptible to landslide hazards, and that it is situated in part in a Very High Fire Hazard Severity Zone. (DEIR, pp. 3.1-14; 3.3-21; 3.7-16.) However, the DEIR does not reference or discuss in any manner the prior efforts to develop the Site for housing, nor does it describe the environmental review processes undertaken by the Town between 1991 and 2017. Those reviews found a variety of significant impacts requiring substantial mitigation, the feasibility of which were in many cases questioned in public comments.

The Town should acknowledge in any Final EIR for the Housing Element Update that future development of the Berg Site for housing may involve significant environmental impacts requiring extensive mitigation beyond what is disclosed and evaluated in the current DEIR, and that further in-depth environmental review under CEQA will be required before specific development applications are approved.

Thank you for your consideration of these comments.

Most sincerely,

M. R. WOLFE & ASSOCIATES, P.C



Mark R. Wolfe  
On behalf of Thomas Weisel

MRW:sa

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<sup>1</sup> We presume the Town maintains files containing these applications and CEQA documents, and accordingly are not submitting them here. We are, however, incorporating them by reference into this letter, and we respectfully ask that they be included in the administrative record for the current DEIR and Housing Element update.

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## 2.2 Responses to Comments

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This chapter includes responses to comments on environmental issues raised in the comment letter, as described in Section 2.1. Responses focus on comments that raise important environmental issues or pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the Proposed Project on the environment pursuant to CEQA. Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final EIR. Where such revisions are warranted in response to comments on the Draft EIR, deletions are shown in ~~striketrough~~ and additions are shown underlined in red in the matrix of comments and responses.

### RESPONSE TO COMMENT LETTER A1

**Commenter:** Thomas Weisel

**Date:** May 1, 2023

Thank you for your comment letter. The commenter recounted the history of environmental review at the Berg Site and identified several potential environmental impacts. The commenter also requested that clarifying text be added to the Draft EIR to indicate that subsequent environmental review would be required for the Berg Site. As noted on page 2-16, the EIR is programmatic and subsequent project-level CEQA analysis may be required. As a programmatic EIR, the Draft EIR cannot assess project specific details because those details cannot be known at this time, as no specific project is proposed on the site. However, when a project is proposed, to the extent that it would result in any project-specific environmental impacts not identified and mitigated in this EIR, project-specific CEQA review would be required to identify any project specific environmental impacts and feasible mitigation to address them.

Further, on page 3.1-14 of the Draft EIR, with respect to species identified as a candidate, sensitive, or special-status species, it is noted that "Future project-specific detailed biological surveys may be necessary to confirm the presence or absence of sensitive resources on future development sites. Impacts associated with future development as a result of the Proposed Project implementation are analyzed qualitatively at a program level."

For potentially significant landslide and seismic hazards at the Berg Site, the Draft EIR similarly notes on page 3.3-21 that project-specific geotechnical investigations are required for development in hillside areas per chapter 18.39 of the Town Code. The ordinance outlines specifications which are required for development in hillside areas, such as avoiding development in unstable areas and protecting newly created slopes from storm runoff and erosion. Compliance with these standards would help reduce project-specific geologic impacts.

In addition, a fire protection plan would be required for development on the Berg Site as described on page 3.7-16 of the Draft EIR. Such plans describe ways to minimize and mitigate potential loss from wildfire exposure. As such, these requirements would reduce wildfire risk for new developments, including at the Berg Site.

### **3 Revisions to the Draft EIR**

This chapter lists revisions to the Draft EIR by chapter and page, in the same order as the revisions would appear in the Draft EIR. New text is indicated with an underline in red and deleted text is indicated with ~~striketrough~~.

#### **Executive Summary**

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Table ES-1 is hereby amended as follows:

<b>Table ES-1: Summary of Impacts and Mitigation Measures</b>			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
<b>3.4 Greenhouse Gas Emissions</b>			
<p>3.4-2 Development under the Proposed Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p> <p><i>Construction</i></p> <p>In lieu of a quantitative threshold for assessing construction-related GHG emissions, BAAQMD recommends evaluating whether construction activities would conflict with statewide emission reduction goals, based on whether feasible BMPs for reducing GHG emissions would be implemented. Construction-related GHG emissions from the Proposed Project would be required to comply with Mitigation Measure GHG-1, which would reduce construction emissions consistent with BAAQMD guidance and statewide emission reduction goals.</p> <p><i>Operations</i></p> <p><del>Implementation of Mitigation Measure GHG-2 would prohibit</del></p>	<p><b>MM GHG-1: Require Implementation of BAAQMD-recommended BMPs.</b></p> <p><del><b>MM GHG-2: Prohibit Natural Gas Plumbing and Appliances in New Housing Sites.</b></del></p> <p><del>All applicants within the Planning Area shall require their contractors, as a condition of contract, to reduce operation related natural gas emissions. Development shall include provision(s) that prohibit natural gas plumbing and the use of natural gas appliances such as cook tops, water heaters, and space heaters in all new housing site developments unless the applicant can show an all electric building design is not feasible due to specific economic, technical, logistical, or other factors associated with the development site.</del></p>	<p>Construction: Potentially significant</p> <p>Operations: Significant and Unavoidable</p>	<p>Construction: Less than significant with mitigation incorporated</p> <p>Operations: Significant and unavoidable</p>

<b>Table ES-1: Summary of Impacts and Mitigation Measures</b>				
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>	
<p>new development projects from building permanent natural gas infrastructure, thereby reducing conflicts with the 2017 Scoping Plan to a less than significant level. <u>The Proposed Project is broadly consistent with the Scoping Plan in that it achieves a net per capita reduction in GHG emissions over existing conditions.</u> However, GHG emissions from mobile sources would conflict with the goals of SB 743. Overall, the Proposed Project would be consistent with policies and plans that encourage energy conservation, energy efficiency, and sustainability, but emissions from mobile sources could result in plan conflicts. Therefore, the Proposed Project would result in a significant and unavoidable impact related to GHG plan/policy consistency.</p>				
<b>3.6 Transportation</b>				
3.6-2	<p>Implementation of the Proposed Project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).</p>	<p><b>MM VMT-1: Implement VMT Reduction Measures for City-Owned Sites.</b> The following VMT reduction measures would apply to the twelve (12) Civic Center and Post Office housing site units.</p>	Significant and unavoidable	Significant and unavoidable

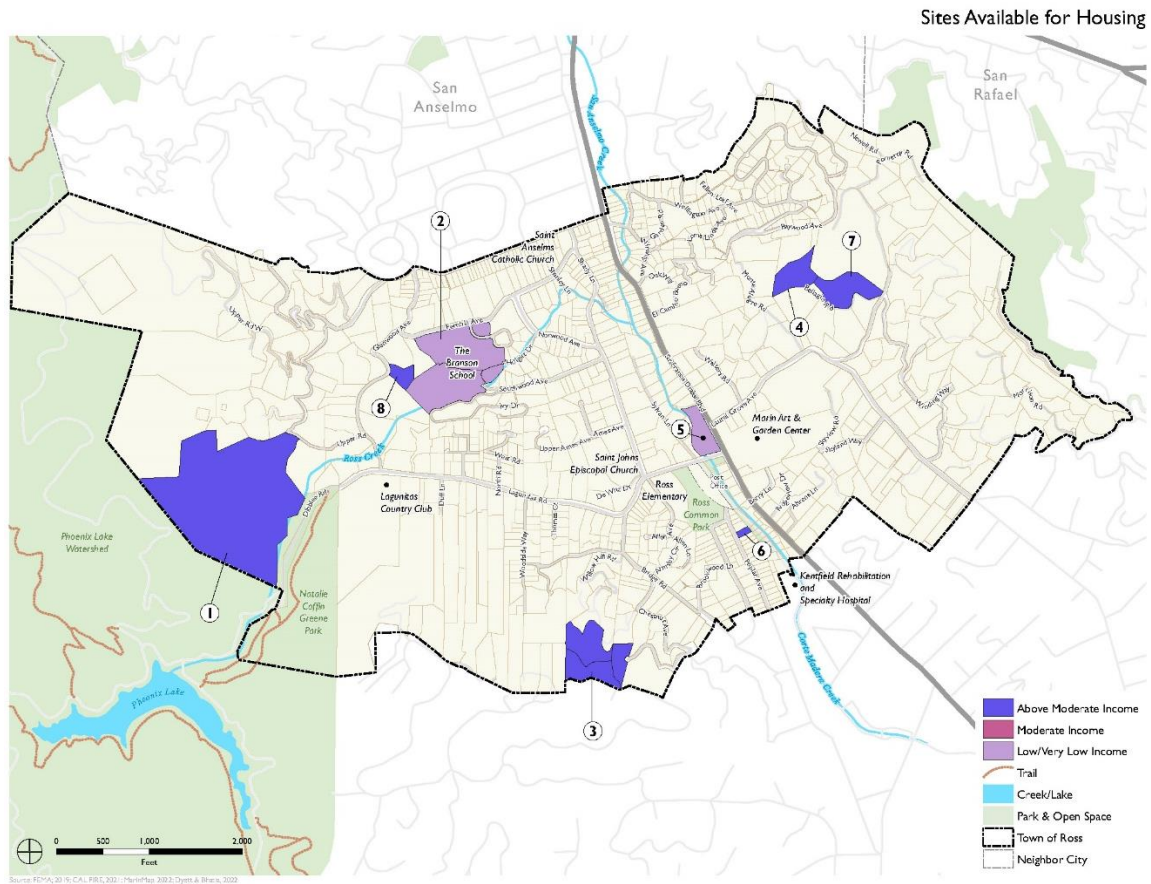
Table ES-1: Summary of Impacts and Mitigation Measures			
Impact	Mitigation Measures	Significance before Mitigation	Significance after Mitigation
<p>CEQA Guidelines Section 15064.3 requires that the determination of significance for transportation impacts be based on VMT instead of a congestion metric such as LOS. The change in the focus of transportation analysis is the result of SB 743. OPR's Technical Advisory provides recommendations for implementing Section 15064.3 of the CEQA Guidelines related to VMT. OPR recommends that if a project does not achieve a level of 15 percent or more below regional or citywide VMT, it may indicate a significant transportation impact. The VMT forecasts indicate that the proposed residential uses would result in a Home-Based VMT per capita that is 12 percent below the baseline 2019 Town VMT per capita. Even with Mitigation Measure VMT-1, the Town may not achieve the overall VMT threshold reduction level and the impact would conservatively remain significant and unavoidable.</p>	<ul style="list-style-type: none"> <li>• <del>Reduced off-street parking requirement: establish a maximum of 1 parking space per unit</del></li> <li>• <del>Town-owned Bikeshare Facility: provide a secure bikeshare facility at or near Town Hall with 10 electric bicycles that would be accessible for use via digital methods to Town employees as well as residents of the Civic Center and Post Office housing units</del></li> </ul> <p><u>Through Program 3-B in the Proposed Housing Element, the Town has committed to reducing off-street parking requirements for multi-family developments located within 0.5 miles of transit to require 1 space per unit and to eliminating the requirement for covered parking spaces to serve caretaker units and other detached housing for household employees where parking can be screened from public view. Additionally, multi-family housing development on the Civic Center site shall be required to provide at least 2 bicycles for the use of residents and Town employees for short trips as a means of further reducing VMT.</u></p> <p>VMT reduction measures are not available for the other sites as they are very small in scale in terms of number of units, low density, located far from the bus stop on Sir Francis Drake at Lagunitas Road, and/or not located in walkable mixed-use areas.</p>		



<b>Table ES-1: Summary of Impacts and Mitigation Measures</b>			
<i>Impact</i>	<i>Mitigation Measures</i>	<i>Significance before Mitigation</i>	<i>Significance after Mitigation</i>
This impact is cumulative by nature because the effects specific to the Proposed Project cannot be reasonably differentiated from the broader effects of regional growth and development.			

## Chapter 2: Project Description

Figure 2.4-2 is hereby amended as follows:



## Section 3.4: Greenhouse Gas Emissions

The second paragraph of page 3.4-29 is hereby amended as follows:

As discussed in Impact 3.4-1, emissions from area and energy sources would conflict with the 2017 Scoping Plan, since the Proposed Project does not include prohibition on all sources of natural gas use in new residential development. Thus, future development associated with the Proposed Project's would continue to use natural gas for building heating and cooking, appliances, and fireplaces, and gasoline or other fossil fuels in landscaping equipment prior to and beyond 2030. However, the Proposed Project is broadly consistent with the Scoping Plan in that it achieves a net per capita reduction in GHG emissions over existing conditions. However, development associated with the Proposed Project would be required to comply with ~~Mitigation Measure GHG-2~~, which would reduce operational emissions from area and energy sources through prohibiting permanent natural gas infrastructure, thereby reducing this impact to less than significant with mitigation.

The first paragraph of page 3.4-31 is hereby amended as follows:

Implementation of **Mitigation Measure GHG-1** would require future development projects to implement BAAQMD-recommended BMPs which would reduce the level of GHGs associated with construction of the future projects and avoid any conflict with statewide GHG reduction goals, thereby reducing this impact to less than significant with mitigation. ~~Further, implementation of **Mitigation Measure GHG-2** would prohibit new development projects from building permanent natural gas infrastructure, thereby reducing conflicts with the 2017 Scoping Plan to a less than significant level.~~ However, GHG emissions from mobile sources would conflict with the goals of SB 743. Overall, the Proposed Project would be broadly consistent with the Scoping Plan and policies and plans that encourage energy conservation, energy efficiency, and sustainability, but emissions from mobile sources could result in plan conflicts. Therefore, the Proposed Project would result in a significant and unavoidable impact related to GHG plan/policy consistency.

The second paragraph of page 3.4-31 is hereby amended as follows:

~~**MM GHG 2: Prohibit Natural Gas Plumbing and Appliances in New Housing Sites.** All applicants within the Planning Area shall require their contractors, as a condition of contract, to reduce operation related natural gas emissions. Development shall include provision(s) that prohibit natural gas plumbing and the use of natural gas appliances such as cook tops, water heaters, and space heaters in all new housing site developments unless the applicant can show an all electric building design is not feasible due to specific economic, technical, logistical, or other factors associated with the development site.~~

## Section 3.6: Transportation

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The third paragraph of page 3.6-12 is hereby amended as follows:

**MM VMT-1: Implement VMT Reduction Measures for Town-Owned Sites.** The following VMT reduction measures would apply to the Civic Center and Post Office housing sites.

- ~~Reduced off-street parking requirement: establish a maximum of 1 parking space per unit~~
- ~~Town-owned Bikeshare Facility: provide a secure bikeshare facility at or near Town Hall with 10 electric bicycles that would be accessible for use via digital methods to Town employees as well as residents of the Civic Center and Post Office housing units~~

Through Program 3-B in the Proposed Housing Element, the Town has committed to reducing off-street parking requirements for multi-family developments located within 0.5 miles of transit to require 1 space per unit and to eliminating the requirement for covered parking spaces to serve caretaker units and other detached housing for household employees where parking can be screened from public view. Additionally, multi-family housing development on the Civic Center site shall be required to provide at least 2 bicycles for the use of residents and Town employees for short trips as a means of further reducing VMT.



Town of Ross  
**2023-31 Housing Element**

**DYETT & BHATIA**  
Urban and Regional Planners