

# PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING DRAFT ENVIRONMENTAL IMPACT REPORT

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**PREPARED BY M-GROUP FOR:**

THE CITY OF PACIFICA PLANNING DEPARTMENT  
540 CRESPI DRIVE  
PACIFICA, CA 94044

**IN ASSOCIATION WITH:**

COAST RIDGE ECOLOGY, BIOLOGICAL CONSULTANT  
EVANS & DE SHAZO, ARCHAEOLOGICAL AND HISTORIC PRESERVATION CONSULTANT  
ILLINGWORTH & RODKIN, AIR QUALITY AND ACOUSTICAL CONSULTANT



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## ACRONYMS

The following provides a list of acronyms in alphabetical order that are used throughout this document. Acronyms are reintroduced in each chapter/section upon their first appearance.

AAI	All Appropriate Inquiries
AAQS	National Ambient Air Quality Standards
AB	Assembly Bill
AB 1358	Assembly Bill 1358
ABAG	Association of Bay Area Governments
AC	asphalt concrete
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing materials
ADU	accessory dwelling unit
ASHERA	Asbestos Hazard Emergency Response Act
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
ASTM	American Society of Testing and Materials
AWSP	Alternative Water Supply Planning Program
BAAQMD	Bay Area Air Quality Management District
BACT	Best Available Control Technology
bgs	below ground surface
BMP	best management practices
BMR	below market rate
BRA	Biological Resources Assessment
C/CAG	City/County Association of Governments
CAA	Clean Air Act
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEnviroScreen	California Communities Environmental Health Screening Tool
Caltrans	California Department of Transportation
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CARE	Community Air Risk Evaluation
CalRecycle	California Department of Resources Recycling and Recovery
CBC	California Building Code
CBC	California Building Code
CCA	Community Choice Aggregation
CCAA	California Clean Air Act
CCR	California Code of Regulations
CCWRP	Calera Creek Water Recycling Plant
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code

CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH <sub>4</sub>	Methane
CMP	Congestion Management Program
CMU	concrete masonry unit
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CPT	cone penetration tests
CPUC	California Public Utilities Commission
C-R	Commercial Recreation
CREC	controlled recognized environmental conditions
CRHR	California Register of Historic Resources
CRHR	California Register of Historical Resources
CRS	Cultural Resources Study
CSFW	California Department of Fish and Wildlife
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CWP	Global Warming Potential
cy	cubic yards
dB	decibel
dba	A-weighted decibel
DBH	diameter at breast height
DEIR	Draft Environmental Impact Report
DEM	Department of Emergency Management
DOT	Department of Transportation
DPM	Diesel Particulate Matter
DWR	Department of Water Resources
EDA	Endangered Species Act
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FAA	Federal Clean Air Act
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHA	Federal Highway Administration
FHSZ	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FRA	Federal Railroad Administration
FRA	Federal Responsibility Area
FTA	Federal Transit Administration
GCASWP	General Construction Activity Storm Water Permit
GGNRA	Golden Gate National Recreational Area
GHG	greenhouse gas
GIS	geographic information systems

GOV	Government Code
GPCD	gallons per capita per day
HI	hazard index
HMTA	Hazardous Materials Transportation Act
HRE	Historic Resource Evaluation
HREC	historical recognized environmental conditions
HTWTP	Harry Tracy Water Treatment Plant
HUD	Department of Housing and Urban Development
Hz	Hertz
ICC	International Code Council
IRF	Intermediate Regional Flood
ISG	Individual Supply Guarantee
IWMP	integrated waste management plan
JUHSD	Jefferson Union High School District
LBP	lead-based paint
Ldn	Day-Night average
LDR	Low Density Residential
Leq	equivalent noise level
LHMP	local hazard mitigation plan
LOS	Level of service
LRA	Local Responsibility Area
LSUSD	Laguna Salada Union School District
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MEI	maximally exposed individuals
MGD	million gallons per day
MLD	most likely descendant
MMI	Modified Mercalli Intensity
MMRP	Mitigation Monitoring and Reporting Program
mph	miles per hour
MPO	Metropolitan Planning Organizations
MRP	Municipal Regional Stormwater Permit
MTC	Metropolitan Transportation Commission
Mw	moment magnitude scale
MWELO	Model Water Efficient Landscape Ordinance
N2O	Nitrous oxide
NAHC	Native American Heritage Commission
NCCWD	North Coast County Water District
NCFA	North County Fire Authority
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO2	nitrogen dioxide
NOP	Notice of Preparation
Nox	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRHP	National Register of Historic Places
NWIC	Northwest Information Center

O3	ozone
OES	Office of Emergency Service
OHWM	ordinary high water mark
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCAP	Pacifica Climate Action Plan
PCBs	polychlorinated biphenyls
P-D	Planned Development
PDA	Priority Development Areas
PG&E	Pacific Gas & Electric
PM	particulate matter
PMC	Pacifica Municipal Code
PPD	Pacifica Police Department
ppd	pounds per day
PRC	Public Resources Code
PSD	Pacifica School District
R-1	Single-Family Residential
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental conditions
REL	reference exposure level
RHNA	Regional Housing Needs Allocation
ROGs	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Boards
RWS	Regional Water System
SamTrans	San Mateo County Transit District
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB 375	Senate Bill 375
SB50	Senate Bill 50
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SFBAAB	San Francisco Bay Area Air Basin
SFHA	Special Flood Hazard Areas
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SFRWQCB	San Francisco Regional Water Quality Control Board
SHPO	State Historic Preservation Offices
SMCL	San Mateo County Libraries
SMCWPPP	San Mateo Countywide Pollution Prevention Program
SO2	sulfur dioxide
SR1	State Route 1
SRA	State Responsibility Area
SSC	Species of Special Concern
SSMP	Sewer System Management Plan
SSO	sanitary sewer overflows
STOPPP	San Mateo Countywide Pollution Prevention Program (former)
SWPPP	Stormwater Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TDM	Transportation Demand Management
TMDL	Total Maximum Daily Loads
TSCA	Toxic Substances Control Act
UCMP	University of California Museum of Paleontology
USACE	U.S. Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
USPS	United States Postal Service
UST	Underground Storage Tanks
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WUI	wildland urban interface





# 1.0 EXECUTIVE SUMMARY

## 1.1 INTRODUCTION

The City of Pacifica, as the Lead Agency, has prepared this Draft Environmental Impact Report (DEIR) for the Pacifica School District Workforce Housing Project (herein after referred to as the proposed project or project) in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. As specified in Section 15123 of the CEQA Guidelines, an EIR is required to include a summary of the proposed action and its consequences. The following summary includes a brief description of the project, areas of known controversy, issues to be resolved, and a summary of significant impacts and proposed mitigation to reduce or avoid such impacts.

## 1.2 PROJECT SUMMARY

In response to the declining school-age population in the area, the Pacifica School District closed the former Oddstad elementary school in 2005. Since then, the need for affordable housing options for the School District's current and future workforce has increased. The project proposes to demolish the existing, non-operational elementary school in order to construct 70 residential units, 11 of which will be below market rate affordable housing units pursuant to the City of Pacifica Municipal Code, as well as community amenities, and other site improvements such as landscaping and parking. To accommodate the proposed development, the project will amend the existing zoning designation from Single-Family Residential (R-1) to Planned Development District (P-D). Entitlements requested from the applicant include the following, and are collectively referenced as File No. 2020-009:

- Rezoning
- Development Agreement
- Development Plan
- Specific Plan
- Vesting Tentative Parcel Map

The project includes a three-lot subdivision including Lot 1 (5.02-acres), Lot 2 (4.69-acres), and Lot 3 (2.78-acres), totaling 12.49-acres. The project will preserve approximately 2.13-acres of the site as undeveloped hillside along the eastern property line for defensible space to support fire prevention site design.

Lot 1, approximately 5.02-acres of the southern portion of the site, will include the existing

recreational field, parking lots, and basketball courts, allowing for continued recreational use by the community and fulfillment of the project's parkland dedication requirement. The off-street parking for this portion of the site will be accessed via the existing driveway on Oddstad Boulevard, approximately 300 feet north of its intersection with Yosemite Drive.

Development of Lot 2 will include construction of four residential buildings containing 45 units. In addition, Lot 2 will contain three residential amenity buildings including an approximately 1,015 square foot community building, 800 square foot restroom, and 900 square foot office. Other improvements include bike storage accommodating parking for up to 18 bicycles, a refuse enclosure, surface parking area, usable open space, and landscaping.

Development of Lot 3 will include construction of three residential buildings containing 25 units as well as bike storage accommodating parking for up to 18 bicycles, refuse enclosure, surface parking area, useable open space, and landscaping.

Vehicular access to Lots 2 and 3 will be provided via a new two-way driveway located along Oddstad Boulevard, north of the site's existing driveway.

### **1.3 AREAS OF KNOWN CONTROVERSY/ISSUES TO BE RESOLVED**

A Notice of Preparation (NOP) was published and circulated on October 22, 2021 to solicit comments regarding the final scope and content of the EIR. Scoping comments received on the project's NOP included oral comments received at the scoping meeting on November 4, 2021 and two written comments received during the 30-day scoping comment period. Issues raised at the scoping meeting and in the comment letters were related to biological resources, cultural and tribal cultural resources, transportation and traffic, and public services and utilities, as further detailed in Section 2.0, Introduction.

### **1.4 SUMMARY OF PROJECT ALTERNATIVES**

The range of alternatives considered include changes to the project design that would reduce the project's environmental impacts and reasonably foreseeable alternatives that could be constructed if the project were disapproved. Alternate land uses were not considered as the site is designated in the City's General Plan for residential use. Alternate site locations were also not considered as the applicant does not control access to other properties and would not meet the stated objective of redeveloping the underutilized school site.

Chapter 6.0 includes a detailed discussion of the three project alternatives including the No Project Alternative, Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative, and Variation of Site Layout and Unit Types Alternative. As discussed therein, the

Variation of Site Layout and Unit Types Alternative is environmentally superior after the No Project Alternative.

## **1.5 IMPACT SUMMARY**

A detailed discussion regarding potential environmental impacts of the proposed project is provided in Section 4.0, Environmental Impact Analysis. A summary of the significant impacts of the proposed project is provided in Table 1-1. Also provided in Table 1-1 are mitigation measures, which are proposed to avoid or reduce significant project and cumulative impacts. The table indicates whether implementation of the recommended mitigation measures would reduce the impact to a less than significant level.

TABLE 1-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<b>Aesthetics</b>			
<b>Impact AES-3:</b> Implementation of the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings nor would the project conflict with applicable zoning and other regulations governing scenic quality in urbanized areas.	<i>Potentially Significant</i>	<b>Mitigation Measure AES-1:</b> <b>AES-1:</b> All applicable Tree Protection Recommendations set forth in the Arborist Report prepared by Traverso Tree Service on March 18, 2020, for the subject property, including, but not limited to recommendations related to protection of Monterey pines (trees 25-27) and Monterey cypress (trees 1-12, 16-20) during the pre-construction, demolition, foundation, grading, construction, and landscaping phases of the project shall be implemented. Final grading plans, construction plans, and building plans shall demonstrate that recommendations set forth in the Arborist Report have been incorporated into the final design of the project. Plans shall also demonstrate compliance with the planting size, species, and ratio recommendations set forth in the Tree Replacement Recommendation Memorandum prepared by Traverso Tree Services on June 17, 2020. Protection measures and replacement trees shall be subject to review and approval by the City of Pacifica Planning Department.	<i>Less than Significant</i>
<b>Air Quality</b>			
<b>Impact AQ-2:</b> Implementation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.	<i>Potentially Significant</i>	<b>Mitigation Measure AQ-1:</b> <b>AQ-1:</b> Latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all demolition and construction plans to require implementation of the following: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall	<i>Less than Significant</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>be watered two times per day.</p> <ol style="list-style-type: none"> <li>2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</li> <li>4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).</li> <li>5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</li> <li>7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</li> <li>8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.</li> </ol>	

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
<p><b>Impact AQ-3:</b> Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations.</p>	<p><i>Potentially Significant</i></p>	<p><b>Mitigation Measure AQ-1 and AQ-2:</b>  <b>AQ-1:</b> (see impact AQ-2 above)  <b>AQ-2:</b> Prior to issuance of a demolition and/or grading permit, a plan to reduce diesel particulate matter emissions by at least 60 percent shall be prepared and submitted to the City for review and acceptance. The plan shall include, but not be limited to, the following strategies:</p> <ol style="list-style-type: none"> <li>1. All construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), if feasible. Alternatively, the plan may include: <ol style="list-style-type: none"> <li>a. Equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 60 percent or greater reduction in particulate matter exhaust in comparison to uncontrolled equipment.</li> <li>b. Alternatively fueled or electric equipment.</li> </ol> </li> <li>2. Alternatively, the applicant may develop a construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 60 percent or greater. The construction operations plan shall be subject to review by an air quality expert and approved by the City prior to construction. Elements of the plan could include a combination of the following measures: <ol style="list-style-type: none"> <li>a. Use Tier 4 or alternatively fueled equipment;</li> <li>b. Installation of electric power lines during early</li> </ol> </li> </ol>	<p><i>Less than Significant</i></p>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>construction phases to avoid use of diesel generators and compressors;</p> <p>c. Use of electric-powered equipment;</p> <p>d. Use of electric or propane/natural gas-powered forklifts and aerial lifts;</p> <p>e. Change in construction build-out plans to lengthen phases;</p> <p>f. Implementation of different building techniques that result in less diesel equipment usage.</p>	
<b>Biological Resources</b>			
<p><b>Impact BIO-1:</b> The project could result in a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.</p>	<p><i>Potentially Significant</i></p>	<p><b>Mitigation Measures BIO-1 through BIO-6:</b></p> <p><b>BIO-1:</b> Prior to the start of construction, a pre-construction survey shall be conducted by a qualified biologist to identify occupied San Francisco dusky-footed woodrat middens onsite. Where feasible, occupied middens shall be avoided and a minimum five (5) foot non-disturbance buffer, or as otherwise recommended by a qualified biologist, shall be established, maintained, and monitored throughout project construction. Additionally, a minimum five (5) foot non-disturbance buffer, or as otherwise recommended by a qualified biologist, shall be established between the eastern limit of proposed development activities and the densely vegetated, impenetrable hazelnut scrub habitat.</p> <p><b>BIO-2:</b> To address potential impacts to San Francisco dusky-footed woodrats, a Relocation Plan prepared by a qualified biologist, shall be prepared and submitted to the City of Pacifica and the California Department of Fish and Wildlife for review and approval. At a minimum, the Relocation Plan shall include, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Nests requiring relocation shall be dismantled by</li> </ul>	<p><i>Less than Significant</i></p>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>construction crews by hand and under the direct supervision of a qualified biologist.</p> <ul style="list-style-type: none"> <li>Each member of the construction crew shall receive an environmental awareness training regarding San Francisco dusky-footed woodrat ecology and specifics of the Relocation Plan.</li> <li>All material removed during nest dismantling shall be moved into the Relocation Area, as determined by the qualified biologist, and constructed into piles suitable for habitation or use as refugia.</li> <li>If an active nest requires removal, the following phased dismantling protocol shall be implemented: <ul style="list-style-type: none"> <li>Remove at least 50-100% of the existing canopy cover and begin dismantling.</li> <li>After partially dismantling the nest, leave nest alone for two to four days to allow woodrats to disperse on their own. After two to four days, continue to disassemble nest by hand. Plan to completely dismantle in two to three sessions.</li> <li>If young are present, the construction crew and qualified biologist shall cease dismantling of the nest for 48 hours to allow the adult to move the young. If the young have been moved and the nest is vacant, nest removal may resume.</li> </ul> </li> <li>If an inactive nest (as determined by a qualified biologist) needs to be removed, it may be removed completely in one day. If woodrats are observed within or fleeing from the nest, the nest will be considered active and relocated using a phased approach.</li> </ul> <p><b>BIO-3:</b> To offset the loss or disturbance of foraging habitat</p>	



POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>(native forbs and shrubs) for the special-status obscure bumble bee (<i>Bombus caliginosus</i>), native shrubs and herbaceous (forb) species known to benefit native bees shall be identified in a revised landscaping plan and introduced onsite. Plants known to benefit native bees shall be selected and may include but are not limited to coyote brush (<i>Baccharis pilularis</i>), sage (<i>Salvia</i> spp.), lupines (<i>Lupinus</i> spp.), various species of Lotus and Acemison, gumplant (<i>Grindelia</i> spp.), and Phacelia spp. As part of the update to the landscaping plans, selected bee-friendly species and planting locations shall be confirmed by a qualified biologist in consultation with the City of Pacifica.</p> <p><b>BIO-4:</b> In the event the construction commences during the rainy season, a qualified biologist shall conduct a pre-construction survey for California red-legged frog no more than five days prior to commencement of ground disturbing activities and provide recommendations for installation of exclusion fencing, as warranted. Results of the survey and recommendations for exclusion fencing shall be submitted to the City of Pacifica.</p> <p>At the recommendation of a qualified biologist and based on factors including the migration window for red-legged frog, rainfall, and inundation, exclusion fencing shall be installed. Exclusion fencing shall be inspected and maintained under the supervision of a qualified biologist.</p> <p><b>BIO-5:</b> To avoid potential impacts to special-status bats, a qualified biologist shall conduct a pre-construction survey of all structures and trees that would be impacted by the project, no more than 15 days prior to demolition, tree</p>	

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>removal, or commencement of ground disturbing activities. Results of the preconstruction survey shall be documented by a qualified biologist and provided to the City of Pacifica. If special-status bat species are found roosting in building or trees proposed to be removed, the biologist shall determine if there are young present (i.e., the biologist should determine if there are maternal roosts). If young are found roosting in any tree or building proposed for removal, such impacts shall be avoided until the young are flying and feeding on their own. A non-disturbance buffer installed with orange construction fencing shall be established around maternity site. The size of the buffer zone will be determined by a qualified bat biologist at the time of detection. If adults are found roosting in a tree or building on the project site but no maternal sites are found, then the adult bats can be flushed, or a one-way eviction door can be placed over the tree cavity for a 48-hour period prior to the tree removal or building demolition. If bats or evidence of bats are detected during the pre-construction surveys, the applicant shall notify the City of Pacifica and the CDFW regarding bat eviction protocol and submit a plan for review and acceptance by the City of Pacifica and the CDFW.</p> <p><b>BIO-6:</b> Should construction activities commence during the bird nesting season (February 1 to August 31), a pre-construction nesting bird survey shall be conducted by a qualified biologist no more than 14 days prior to the start of construction activities. Areas within 300 to 500 feet of construction shall be surveyed for active nests. Should active nests be identified, a disturbance-free buffer shall be established based on the needs of the species as set forth by</p>	

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		CDFW and shall be maintained until a qualified biologist verifies that the nestlings have fledged, or the nest has failed. Should construction activities cease for 14 consecutive days or more within the nesting season, an additional nesting bird survey shall be required prior to resuming construction. Results of the pre-construction nesting bird survey shall be submitted to the City of Pacifica.	
<b>Impact BIO-3:</b> The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	<i>Potentially Significant</i>	<p><b>Mitigation Measures BIO-7 through BIO-9:</b></p> <p><b>BIO-7:</b> Indirect impacts to the seasonal wetlands and jurisdictional drainage feature shall be avoided through implementation of best management practices (BMPs) prior to earthwork. Construction exclusion zones shall be established by installing appropriate construction fencing, silt fencing, wildlife friendly hay wattles (no monofilament netting), gravel wattles, and other protective measures between project activities and the seasonal wetlands and drainage feature.</p> <p>All non-native, invasive vegetation removed shall be discarded offsite and away from wetland areas to prevent reseeding.</p> <p>Prior to implementation of the construction project, a biological monitor shall inspect installation of BMPs to ensure proper protection of the seasonal wetlands and jurisdictional drainage feature areas are in place. BMPs shall thereafter be routinely inspected by the construction manager to ensure BMPs remain in place for the duration of construction activities. Upon completion of project construction all exclusion fencing shall be removed along with any temporary BMPs.</p> <p><b>BIO-8:</b> A total of 0.063 acres of potential wetlands were</p>	<i>Less than Significant</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>identified in the project area. In the event that wetland plants are removed, altered, or destroyed along the edges of the concrete drainage ditch during repair/replacement of the concrete drainage ditch, the applicant shall replant these areas with native wetland plants at a 1:1 ratio to ensure continued viability of the wetlands.</p> <p><b>BIO-9:</b> To avoid impacts to jurisdictional waters and wetlands throughout project operation, plans submitted for building permit shall be revised to include a split rail fence along the boundary between the recreational field and seasonal wetlands and concrete drainage ditch located at the southeast portion of the project site to preclude access and limit foot traffic within the drainage and wetland features.</p>	
<b>Impact BIO-5:</b> The project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	<i>Potentially Significant</i>	<b>Mitigation Measure AES-1</b> (see impact AES-3)	<i>Less than Significant</i>
<b>Cultural and Tribal Cultural Resources</b>			
<b>Impact C/TCUL-2:</b> Implementation of the project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	<i>Potentially Significant</i>	<p><b>Mitigation Measures C/TCUL-1 and C/TCUL-2:</b></p> <p><b>C/TCUL-1:</b> Prior to commencement of ground-disturbing activities, project supervisors, equipment operators, and other members of the construction team overseeing or conducting ground-disturbing activities shall receive one or more preconstruction Cultural Awareness Trainings by a Secretary of Interior-qualified archaeologist. The Training shall educate and familiarize supervisors, contractors, and equipment operators with the potential to encounter archaeological resources, the types of archaeological material that could be encountered, and procedures to follow</p>	<i>Less than Significant</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>if archaeological deposits and/or artifacts are encountered during construction.</p> <p><b>C/TCUL-2:</b> In the event that an archaeological deposit is encountered during ground-disturbing activities, all work within 50-feet of the discovery shall be redirected until a Secretary of Interior-qualified archaeologist is retained to inspect the material and provide recommendations for appropriate treatment of the resource pursuant to regulations and guidelines set forth in the California Environmental Quality Act, including the involvement of Native American monitors if a prehistoric archaeological resource is identified. If avoidance of the archaeological resource is not feasible, the archaeological resource shall be evaluated for its eligibility for listing in the California Register of Historic Resources. In the event that archaeological resources are identified as eligible for listing on the CRHR, recommendations for proper treatment and handling shall be identified by the qualified archaeologist including, but not be limited to, avoidance or excavation in accordance with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation, which may include data recovery using standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; preparation of a report detailing the methods, findings, and significance of the archaeological site and associated materials; and accessioning of archaeological materials and a technical data recovery report at a curation facility. Upon completion of the assessment, the archaeologist shall prepare a report to document the methods and results of the assessment. The report shall be</p>	

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		submitted to the project applicant and the Northwest Information Center.	
<b>Impact C/TCUL-3:</b> Implementation of the project could potentially cause a significant impact due to disturbance of human remains, including those interred outside of formal cemeteries.	<i>Potentially Significant</i>	<b>Mitigation Measure T/TCUL-3:</b> <b>C/TCUL-3:</b> In the event that human remains are encountered during ground-disturbing activities, all work must stop within 100-feet of the discovery area, the area shall be secured to prevent further disturbance, and the San Mateo County Coroner shall be notified immediately. The Coroner will determine if the remains are precontact period Native American remains or of modern origin, and if any further investigation by the coroner is warranted. If the remains are believed to be precontact period Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) by telephone within 24-hours. The NAHC will immediately notify the person believed to be the most likely descendant (MLD) of the remains. The MLD has 48-hours to make recommendations to the landowner for treatment or disposition of the human remains. If the MLD does not make recommendations within 48-hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC. An archaeologist should also be retained to evaluate the historical significance of the discovery, the potential for additional remains, and to provide further recommendations for treatment of the site in coordination with the MLD.	<i>Less than Significant</i>
<b>Impact C/TCUL-4:</b> Implementation of the project could cause a substantial adverse change in the significance of	<i>Potentially Significant</i>	<b>Mitigation Measures C/TCUL-1 and C/TCUL-2</b> (see impact T/TCUL-2 above)	<i>Less than Significant</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
a tribal cultural resource, including resources that are listed or eligible for listing in the CRHR, or in a local register of historical resources, or that are determined by the City of Pacifica to be significant pursuant to criteria set forth in Section 5024.1(c) of Public Resources Code.			
<b>Geology and Soils</b>			
<b>Impact GEO-1:</b> The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, or seismic-related ground failure including liquefaction and landslides.	<i>Potentially Significant</i>	<b>Mitigation Measure GEO-1:</b> <b>GEO-1:</b> All applicable recommendations set forth in the Design Level Geotechnical Investigation prepared by Rockridge Geotechnical on August 20, 2020, for the subject property, including, but not limited to recommendations related to grading, drainage, excavation, foundations systems, and compaction specifications shall be implemented. Final grading plan, construction plans, and building plans shall demonstrate that recommendations set forth in the geotechnical reports have been incorporated into the final design of the project and to the satisfaction of the City of Pacifica City Engineer.	<i>Less than Significant</i>
<b>Impact GEO-2:</b> The proposed project could result in substantial soil erosion or the loss of topsoil.	<i>Potentially Significant</i>	<b>Mitigation Measure GEO-2:</b> <b>GEO-2:</b> Upon submittal of grading and drainage plans, the applicant shall demonstrate compliance with applicable requirements of Title 6, Chapter 12 (Stormwater Management and Discharge Control) of the City of Pacifica Municipal Code. Plans shall include identification of appropriate best management practices (BMPs) to prevent the discharge of construction wastes or contaminants from construction materials, tools, equipment, stockpiles, or	<i>Less than Significant</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		exposed soil from entering the City storm water system or watercourses. Plans shall also demonstrate compliance with stormwater treatment requirements set forth in NPDES Permit No. CAS612008.	
<b>Impact GEO-3:</b> The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	<i>Potentially Significant</i>	<b>Mitigation Measure GEO-1:</b> (see impact GEO-1 above)	<i>Less than Significant</i>
<b>Impact GEO-4:</b> The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	<i>Potentially Significant</i>	<b>Mitigation Measure GEO-1:</b> (see impact GEO-1 above)	<i>Less than Significant</i>
<b>Impact GEO-6:</b> The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	<i>Potentially Significant</i>	<b>Mitigation Measure GEO-3:</b> <b>GEO-3:</b> In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities, all ground disturbing activities shall halt, and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.	<i>Less than Significant</i>
<b>Greenhouse Gas Emissions</b>			
<b>Impact GHG-1:</b> Implementation of the proposed Pacifica School District Workforce Housing project would not generate greenhouse gas emissions, either directly or indirectly, that	<i>Potentially Significant</i>	<b>Mitigation Measure GHG-1:</b> <b>GHG-1:</b> Prior to issuance of a demolition and/or grading permit, a GHG reduction plan shall be prepared and submitted to the City for review and acceptance. The plan shall, at a minimum demonstrate that the project will use at	<i>Less than Significant</i>



POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
would result in a significant impact on the environment.		least 10 percent local building materials and will reuse/recycle at least 50 percent construction waste and demolition material. In the event that these measures are not feasible, the plan shall identify suitable replacement measures aimed at reducing GHG emissions.	
<b>Hazards and Hazardous Materials</b>			
<b>Impact HAZ-2:</b> The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	<i>Potentially Significant</i>	<b>Mitigation Measure HAZ-1:</b> <b>HAZ-1:</b> Prior to demolition of the existing structures an asbestos survey shall be performed by a licensed asbestos inspector to identify all asbestos-containing materials (ACM) and lead-based paint (LBP). The survey shall adhere to sampling protocols outlined by the Asbestos Hazard Emergency Response Act (AHERA) and shall incorporate the findings of the survey into a report to be submitted to the City. In the event that such substances are found, the report shall include appropriate removal and disposal protocols subject to requirements set forth by the Occupational Safety and Health Administration (OSHA) AHERA requirements, lead standard contained in 29 CFR 1910.1025 and 1926.62, and any other local, state, or federal regulations. Treatment, handling, and disposal of these materials shall be performed by qualified professionals in accordance with applicable federal and state regulations.	<i>Less than Significant</i>
<b>Impact HAZ-7:</b> The proposed project could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	<i>Potentially Significant</i>	<b>Mitigation Measure HAZ-2:</b> <b>HAZ-2:</b> Upon submittal of a building permit the applicant shall submit a site-specific Vegetation Management Plan for review and approval by the City of Pacifica and the North County Fire Authority. The Plan shall: 1. Remove all vegetation within the site listed on the San	<i>Less than Significant</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<p>Mateo County list of “Fire Prone (Pyrophytic) Plants” except for isolated specimen plants.</p> <ol style="list-style-type: none"> <li>a. Existing isolated or newly planted specimens shall meet the vertical and horizontal spacing guidelines.</li> <li>2. Maintain and plant all trees and shrubs to the specifications identified in ‘Plant and Tree Spacing’, ‘Vertical Spacing’, and ‘Horizontal Spacing’ as outlined in the Plan “Fire Safe Landscaping” guide.               <ol style="list-style-type: none"> <li>a. An evaluation of slope implications shall be reflected when determining the landscape.</li> <li>b. All plantings shall be from the Plan “Firescaping with Native Plants” or otherwise fire resistive plantings.</li> </ol> </li> <li>3. Maintain an ember zone of 5 feet around all buildings pursuant to CGC 51182 (5)(1), (2) within the Project.               <ol style="list-style-type: none"> <li>a. The ember zone be maintained on a minimum monthly basis.</li> </ol> </li> <li>4. Maintain all landscaping and vegetation on the Project site on a regular basis as part of a regular landscape maintenance program.               <ol style="list-style-type: none"> <li>a. All vegetation shall be irrigated as needed to maintain the vegetation.</li> </ol> </li> </ol>	
<b>Noise</b>			
<p><b>Impact NOI-1:</b> The proposed project could involve generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other</p>	<p><i>Potentially Significant</i></p>	<p><b>Mitigation Measure NOI-1:</b></p> <p><b>NOI-1:</b> Construction activities shall comply with the following best management practices to minimize noise levels from the proposed development:</p> <ul style="list-style-type: none"> <li>• Construction will be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays. Any work outside of these hours by the construction contractors should</li> </ul>	<p><i>Less than Significant</i></p>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
agencies.		<p>require a special permit from the City Engineer. There should be compelling reasons for permitting construction outside of these designated hours.</p> <ul style="list-style-type: none"> <li>• The contractor shall use “new technology” power construction equipment with state-of-the-art noise shielding and muffling devices. All internal combustion engines used on the project site shall be equipped with adequate mufflers and shall be in good mechanical condition to minimize noise created by faulty or poorly maintained engines or other components.</li> <li>• Staging areas and stationary noise-generating equipment shall be located as far as possible from noise-sensitive receptors, such as residential uses (a minimum of 200 feet).</li> <li>• Ensure that generators, compressors, and pumps are housed in acoustical enclosures.</li> <li>• Locate cranes as far from adjoining noise-sensitive receptors as possible.</li> <li>• During final grading, substitute graders for bulldozers, where feasible. Wheeled heavy equipment are quieter than track equipment and should be used where feasible.</li> <li>• Substitute nail guns for manual hammering and electrically powered tools for noisier pneumatic tools, where feasible.</li> <li>• The adjacent residences shall be notified early and frequently of the construction activities.</li> <li>• A “noise disturbance coordinator” shall be designated to respond to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (e.g., beginning work too early,</li> </ul>	

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		bad muffler, etc.) and institute reasonable measures warranted to correct the problem. A telephone number for the disturbance coordinator would be conspicuously posted at the construction site.	
<b>Transportation and Traffic</b>			
<b>Impact TRA-2:</b> The project will conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (B).	<i>Significant</i>	<b>Mitigation Measure TRA-1 and TRA-2:</b> <b>TRA-1:</b> Upon submittal of plans for building permit, the applicant shall submit a list of Transportation Demand Management (TDM) strategies to be implemented district-wide. TDM strategies shall be clearly defined in terms of location, extent, timing, and responsibility for implementation. Strategies may include, but are not limited to the following: <ul style="list-style-type: none"> <li>• Safe Routes to School. Pursue grants to fund pedestrian and bicycle improvements around Pacifica School District schools to increase safety for students and staff walking and bicycling.</li> <li>• Install Bike Racks. Identify Pacifica School District schools where more bicycle racks are needed. Once identified, install as needed.</li> <li>• Install e-bike Charging Stations. Install e-bike charging systems in secure bike parking facilities at Pacifica School District schools.</li> <li>• Samtrans Flex Services. Continue to partner with Samtrans to establish fixed-route services to Pacifica School District schools. Coordinate with Samtrans on possible flex services (such as dial-a-ride) to serve schools with lower demand.</li> <li>• Shuttle Services. Partner with the Jefferson Union School District to fund shuttle services to Pacifica schools.</li> </ul>	<i>Significant and Unavoidable</i>

POTENTIAL IMPACTS	LEVEL OF SIGNIFICANCE WITH MITIGATION	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION
		<b>TRA-2:</b> To promote electric vehicle ownership and reduce GHG emissions associated with vehicles traveling to and from the site, install electric vehicle (EV) charging infrastructure and equipment as required by the 2022 California Building Standards Code and any City of Pacifica local amendments thereto.	
<b>Impact TRA-3:</b> The project will not substantially increase hazards due to a geometric design or incompatible uses.	<i>Potentially Significant</i>	<p><b>Mitigation Measures TRA-3 and TRA-4:</b></p> <p><b>TRA-3:</b> To maintain adequate sight lines at the project driveways, signage and landscaping introduced onsite within close proximity of the driveways shall be maintained such that low-lying shrubs remain at a height lower than three feet from ground level and that tree branches be no less than seven feet in height from ground level. The applicant shall be responsible for maintaining adequate sight lines from the project driveways.</p> <p><b>TRA-4:</b> Parking shall be prohibited south of the project driveway along Oddstad Boulevard for a distance of at least 30 feet. To ensure parking does not occur in this area, curbs shall be painted red subject to review and approval by the Pacific Fire Department.</p>	<i>Less than Significant</i>



# 2.0 INTRODUCTION

This Draft Environmental Impact Report (DEIR) has been prepared in accordance with California Public Resources Code Section 21000 et seq. and the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3).

## 2.1 PURPOSE OF THE EIR

As described in CEQA Guidelines Section 15121(a), an EIR is a public disclosure document that provides decision-makers and the public with information that enables consideration of the environmental consequences of the proposed project. CEQA requires that an EIR be prepared by the agency with primary responsibility over approval of a project (lead agency). The lead agency is charged with considering and, where feasible, minimizing environmental impacts of proposed development and is committed to balancing economic, environmental, and social factors.

On April 15, 2020, the Pacifica School District (School District) applied to the City of Pacifica for permits to construct and operate the Pacifica School District Workforce Housing Project (herein after referred to as the proposed project or project). The City of Pacifica, as the lead agency under CEQA, has determined that demolition of the existing school complex and construction and operation of the proposed project is a "project" under CEQA, which defines a project as the whole of an action that has the potential to result in a direct physical change or a reasonably foreseeable indirect physical change in the environment CEQA Guidelines Section 15378[a]). CEQA requires the preparation of an EIR prior to approving any project that may have a significant impact on the environment.

This summary is provided in accordance with CEQA Guidelines Section 15123. As provided therein, an EIR is required to include a brief summary of the proposed actions and its consequences as well as a brief description of the proposed project, a summary of the significant effects and associated mitigation measures, areas of known controversy, identification of alternatives evaluated, and of the environmentally superior alternative.

## 2.2 DRAFT EIR REVIEW PROCESS

### 2.2.1 NOTICE OF PREPARATION

In accordance with Section 15082 of the State CEQA Guidelines, the City of Pacifica, as the lead agency, published the Notice of Preparation of an EIR, included herein as Appendix 2-A.

The NOP was circulated to the State Clearinghouse (SCH) for distribution to federal, state, and local agencies, and was noticed pursuant to local noticing procedures set forth by the City of Pacifica on October 22, 2021. The 30-day NOP review period extended from October 22, 2021 to November 22, 2021. In accordance with Section 15063(a) of the CEQA Guidelines, when the lead agency can determine that an EIR will clearly be required, an initial study is not required and as such an Initial Study has not been prepared for the proposed project.

### **2.2.2 PUBLIC SCOPING**

The City of Pacifica posted the NOP with the California Office of Planning and Research, the County of San Mateo Clerk-Recorder, and distributed the NOP in accordance with local noticing requirements. The Pacifica School District and the City of Pacifica held a joint informational/scoping meeting on November 4, 2021. In addition to comments received at the November 4<sup>th</sup> meeting, the City received two written comments on the NOP. A copy of all written comments received during the 30-day scoping comment period are included in Appendix 2-B, the contents of which are summarized below.

- **Biological Resources**
  - ♦ Potential drainage feature along the south side of the property near Yosemite Drive and the City's Frontierland Park
- **Cultural and Tribal Cultural Resources**
  - ♦ The Native American Heritage Commission (NAHC) submitted a letter encouraging the City to conduct AB 52 notification, SB 18 (as appropriate) and to consult with Native American Tribes.
- **Transportation and Traffic**
  - ♦ Adequacy of parking onsite and concern regarding parking spill over into the neighborhood
  - ♦ Traffic generation by the project and effects on neighborhood roadways
- **Public Services/Utilities and Service Systems**
  - ♦ Concern that existing City infrastructure cannot support the added demand of the proposed project

### **2.2.3 DRAFT ENVIRONMENTAL IMPACT REPORT**

This document constitutes the DEIR prepared for the proposed demolition of the unoccupied Oddstad School and construction of the 70-unit, Pacifica School District Workforce Housing project and associated recreational facility improvements in Pacifica, California. It contains a description of the project, description of the environmental setting, identification of project



impacts and mitigation measures for impacts found to be significant, and an analysis of project alternatives. The DEIR addresses environmental issues that could result in potentially significant environmental effects from project implementation. Significance criteria are further described in Chapter 4.0 Environmental Evaluation.

CEQA requires that a lead agency shall neither approve nor carry out a project as proposed unless the significant environmental effects have been reduced to an acceptable level, where possible (CEQA Guidelines Section 15091 and Section 15092). An acceptable level is defined as eliminating, avoiding, or substantially lessening the significant effects. If such a reduction is not possible, a lead agency must adopt a Statement of Overriding Considerations, which is defined in CEQA Guidelines Section 15093 as a balance of the benefits of a project against its unavoidable consequences.

#### **2.2.4 PUBLIC REVIEW OF DEIR**

This DEIR is being circulated to state and local agencies, all adjacent landowners, and to other interested parties. Publication of this DEIR marks the beginning of the public review period, during which written comments may be submitted to the following address:

Christopher Dacumos, Consulting Senior Planner  
City of Pacifica, Planning Department  
540 Crespi Drive  
Pacifica, CA 94044

Comments may also be submitted via email to: [planner1@ci.pacifica.ca.us](mailto:planner1@ci.pacifica.ca.us)

#### **2.2.5 FINAL ENVIRONMENTAL IMPACT REPORT**

A Final Environmental Impact Report (FEIR) will be prepared after the public review period on the DEIR has ended. The FEIR will consist of the following, consistent with Section 15132 of the CEQA Guidelines:

- The DEIR or a revised version of the DEIR
- Comments and recommendations received on the DEIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the DEIR
- Responses to significant environmental points raised in the DEIR process
- Any other information added by the lead agency

Upon completion of the FEIR and scheduling of a public hearing, the City of Pacifica City Council will consider certification of the Environmental Impact Report consistent with CEQA Guidelines Section 15090. Once the EIR has been certified, the City's decision-making body

may take action on the project entitlements, which may occur concurrently or at a separate hearing. Prior to approving the project, the City must make written findings with respect to each significant environmental effect identified in the EIR in accordance with Section 15091 of the CEQA Guidelines.

### 2.2.6 MITIGATION MONITORING AND REPORTING

Pursuant to CEQA Guidelines Section 15097, the lead agency is required to adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure that the mitigation measures and project revisions identified in the EIR are implemented to avoid significant effects on the environment as identified in the EIR. The specific reporting or monitoring program is not required to be included in the EIR. As such, the Mitigation Monitoring and Reporting Program for the proposed project will be prepared concurrent with the FEIR.

## 2.3 EIR SCOPE

Consistent with Section 15060 of the CEQA Guidelines, the City of Pacifica completed review of the application materials for the proposed project and determined that an EIR was the appropriate level of environmental review. Based on the anticipated environmental impacts and comments received during the NOP comment period, the City identified the environmental topics listed in Table 2-1 to be evaluated in detail in the DEIR. In addition to the topics listed below, the DEIR also includes a statement indicating the reasons why impacts to Agricultural and Forestry Resources, Energy, Mineral Resources, and Recreation resulting from the project were determined not to be significant and are therefore not discussed in detail in the EIR, consistent with Section 15128 of the CEQA Guidelines.

**TABLE 2-1: ENVIRONMENTAL TOPICS TO BE EVALUATED IN THE DEIR**

- |  |                                  |
|--|----------------------------------|
| • Aesthetics                             | • Land Use and Planning          |
| • Air Quality                            | • Noise                          |
| • Biological Resources                   | • Population and Housing         |
| • Cultural and Tribal Cultural Resources | • Public Services                |
| • Geology and Soils                      | • Transportation and Circulation |
| • Greenhouse Gas Emissions               | • Utilities and Service Systems  |
| • Hazards and Hazardous Materials        | • Wildfire                       |
| • Hydrology and Water Quality            |                                  |

## 2.4 EIR ORGANIZATION

The DEIR is organized into the following Chapters:

**Chapter 1.0 - Executive Summary**, presents a brief description of the proposed project,

summarizes environmental consequences that would result from implementation of the proposed project, provides a summary table identifying anticipated significant environmental impacts, describes identified mitigation measures, and indicates the level of significance of impacts before and after mitigation. This section also presents a brief description of alternatives to the proposed project and provides a table comparing each of the identified alternatives to the proposed project.

**Chapter 2.0 - Introduction**, provides an introduction and overview describing the purpose and scope of topics addressed in this DEIR and the environmental review process.

**Chapter 3.0 - Project Description**, describes the proposed project, including the project location, existing site conditions, existing and proposed land uses, project components and objectives, and a discussion of the intended uses of the EIR.

**Chapter 4.0 - Environmental Impact Analysis**, describes the regulatory context and environmental setting, including applicable plans and policies for each environmental topic identified above, provides an analysis of the significant environmental impacts of the proposed project, and identifies mitigation measures to avoid or reduce the severity of significant impacts.

**Chapter 5.0 - Other CEQA Considerations**, provides a discussion of the project's cumulative impacts, the potential for growth inducement due to project implementation, significant and unavoidable impacts, and significant irreversible environmental changes that are anticipated to result from implementation of the proposed project.

**Chapter 6.0 - Alternatives**, summarizes alternatives to the proposed project, including the No Project Alternative as required by CEQA, and the comparative environmental consequences of each alternative.

**Chapter 7.0 - References**, provides a list of source materials and persons consulted to support analyses contained in the DEIR and provides a list of individuals and organizations involved in preparation of the DEIR.

## 2.5 APPENDICES

- Appendix 2-A: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Pacifica School District Workforce Housing Project
- Appendix 2-B: Notice of Preparation Comment Letters



## 3.0 PROJECT DESCRIPTION

Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15124 (Project Description), this Chapter of the Draft Environmental Impact Report (DEIR) includes a description of the proposed project's location, objectives, characteristics, and the intended uses of this DEIR including, where applicable, a list of agencies expected to use the DEIR in their decision making, a description of City and outside agency approvals needed to implement the project, and a list of federal, state, and local environmental review and consultation requirements.

### 3.1 REGIONAL LOCATION

The project is in the southeastern portion of the City of Pacifica at 930 Oddstad Boulevard (APN 023-672-600), within the Park Pacifica neighborhood, on an approximately 12.49-acre site. The site is bounded by Big Bend Drive to the north, Yosemite Drive to the south, Oddstad Boulevard to the west, and the City's Frontierland Park to the east (**Figure 3-1: Regional Location**)

### 3.2 EXISTING SITE CONDITIONS AND SURROUNDING LAND USES

The site contains a single-story school complex, including circulation improvements, recreational fields and courts, parking areas, landscaping, and fencing along the Oddstad Boulevard frontage and along the northern and southern property lines. The eastern most hillside areas of the site are undeveloped. Surrounding land uses include single-family residences across Oddstad Boulevard to the west, the approximately 63-acre City-owned and operated Frontierland Park and undeveloped hillside to the east, single-family residences and the Pacifica Boys and Girls Club to the south, and single-family residences to the north. Other uses proximate to the project site include the Park Mall commercial shopping center, 76 gas station, Pacifica Sanchez Library, multi-family residences, and Pacifica Oaks Senior Apartments, located approximately one-half mile south of the project site near the intersection of Oddstad Boulevard and Terra Nova Boulevard (**Figure 3-2: Project Vicinity**).

The project site was part of the Park Pacifica Highlands subdivision, recorded with the County of San Mateo in 1965. The subdivision consisted of 54 single-family residential lots, two remainder lots adjacent to the City-owned Frontierland Park, and four dedicated public rights-of-way intended to provide access to future residential units, referenced on the

recorded map as Everglades Court, Shenandoah Court, Carlsbad Court, and Big Bend Court.<sup>1</sup> The site was acquired by the Pacifica School District (“PSD” or “School District”) in 1966 and was developed as the Oddstad Elementary School, originally constructed in 1967-1968 and began operation in 1968. In response to the declining school-age population in the area, the PSD closed the former public elementary school in 2005 and as such no longer operates it as an elementary school. The site was utilized by third party commercial tenants and various education and non-industrial uses from 2006 to 2019. Since 2019, the School District has utilized the building exclusively as storage. The site contains three recreational fields, all of which continue to be publicly accessible and are utilized by a variety of organized sport groups as well as individuals.

### 3.2.1 GENERAL PLAN LAND USE DESIGNATION

The project site is designated Low Density Residential in the City’s General Plan. The Low Density Residential land use designation allows residential development at a range of 3 to 9 dwelling units per acre. As shown in **Figure 3-3: General Plan Land Use Designations**, the project site is predominately surrounded by land also designated as Low Density Residential. In addition, the Pacifica Boys and Girls Club, located south of the site is designated Public and Semi Public, and the City’s Frontierland Park, located east of the site is designated as Park.

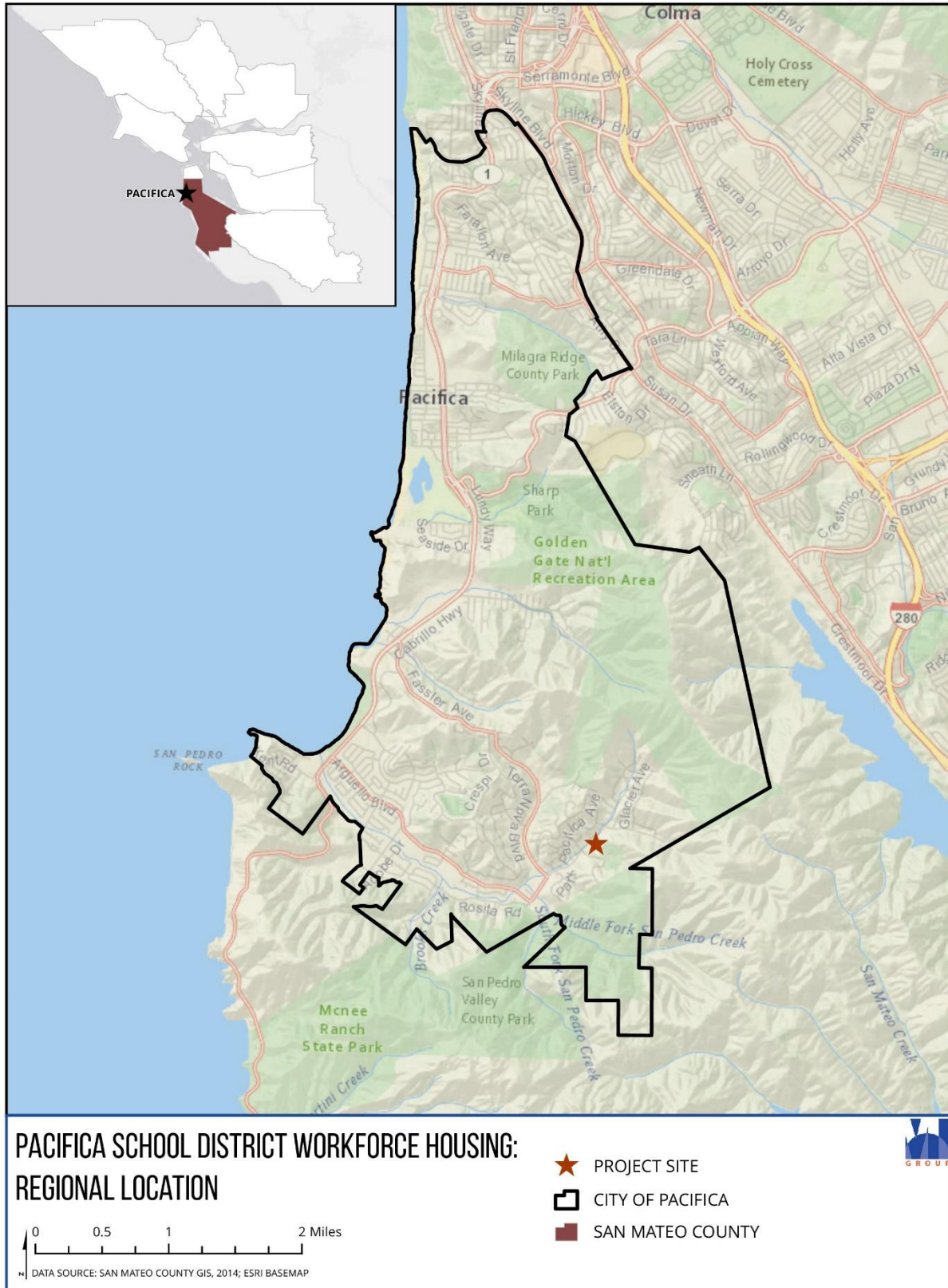
### 3.2.2 ZONING DESIGNATION

The project site has a Zoning Designation of Single-Family Residential (R-1), which permits by-right single-family dwellings, accessory dwelling units (ADUs), junior ADUs, child day care homes, small special care facilities, and accessory buildings and uses. The R-1 Zoning District also conditionally permits churches, schools, parks, playgrounds, crop and tree farming, mobile home parks, large special care facilities, landscaped public or private parking lots when adjacent to any C district, and small bed and breakfast facilities. As shown in **Figure 3-4: Zoning Designations**, the site is surrounded by areas also designated as R-1 as well as the City’s Frontierland Park to the east, which is designated as Commercial Recreation (C-R).

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<sup>1</sup> San Mateo County Recorder, Park Pacifica Highlands No. 1, Volume 63, pages 13, 14, and 15

FIGURE 3-1





**FIGURE 3-2**

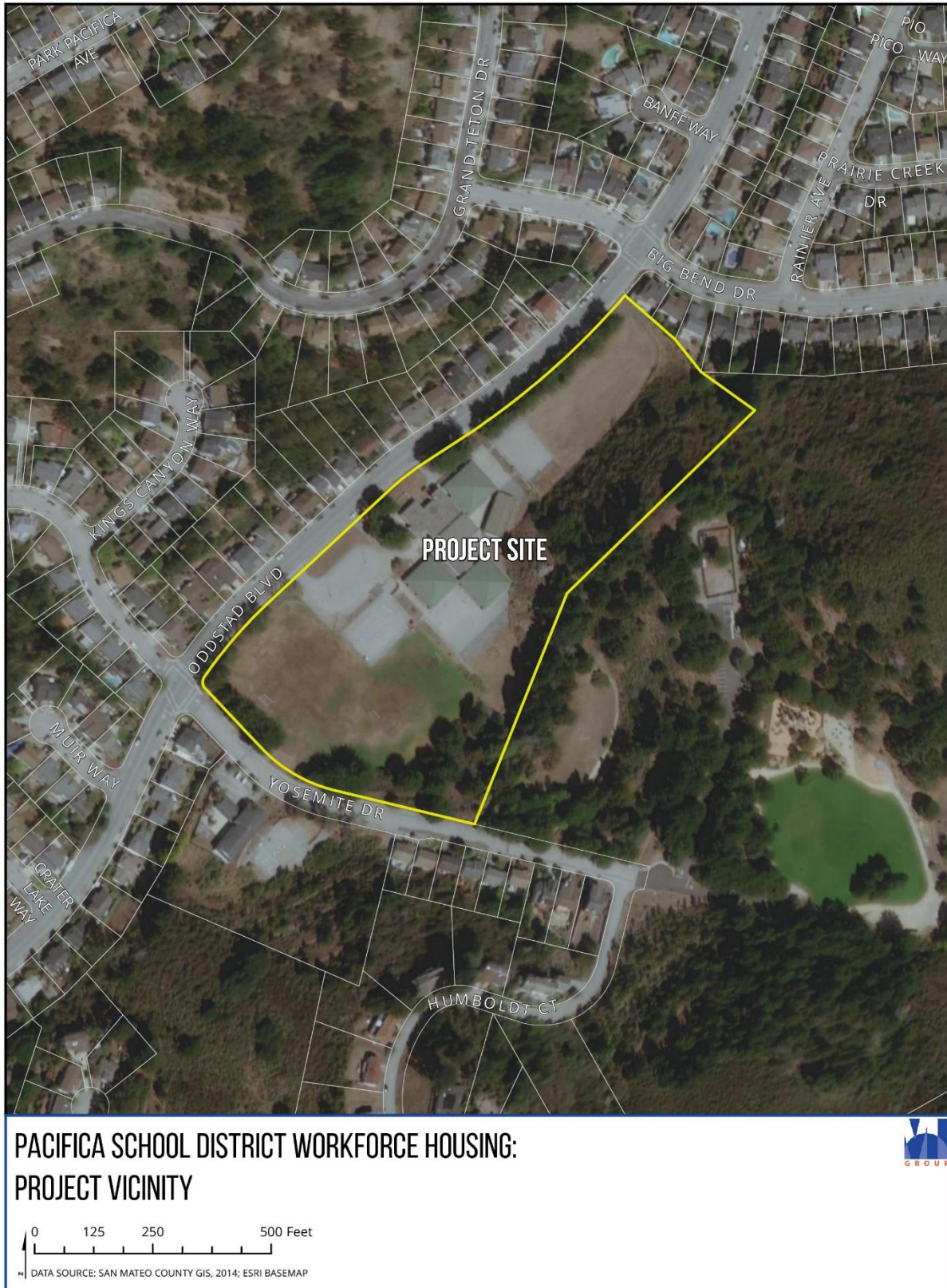


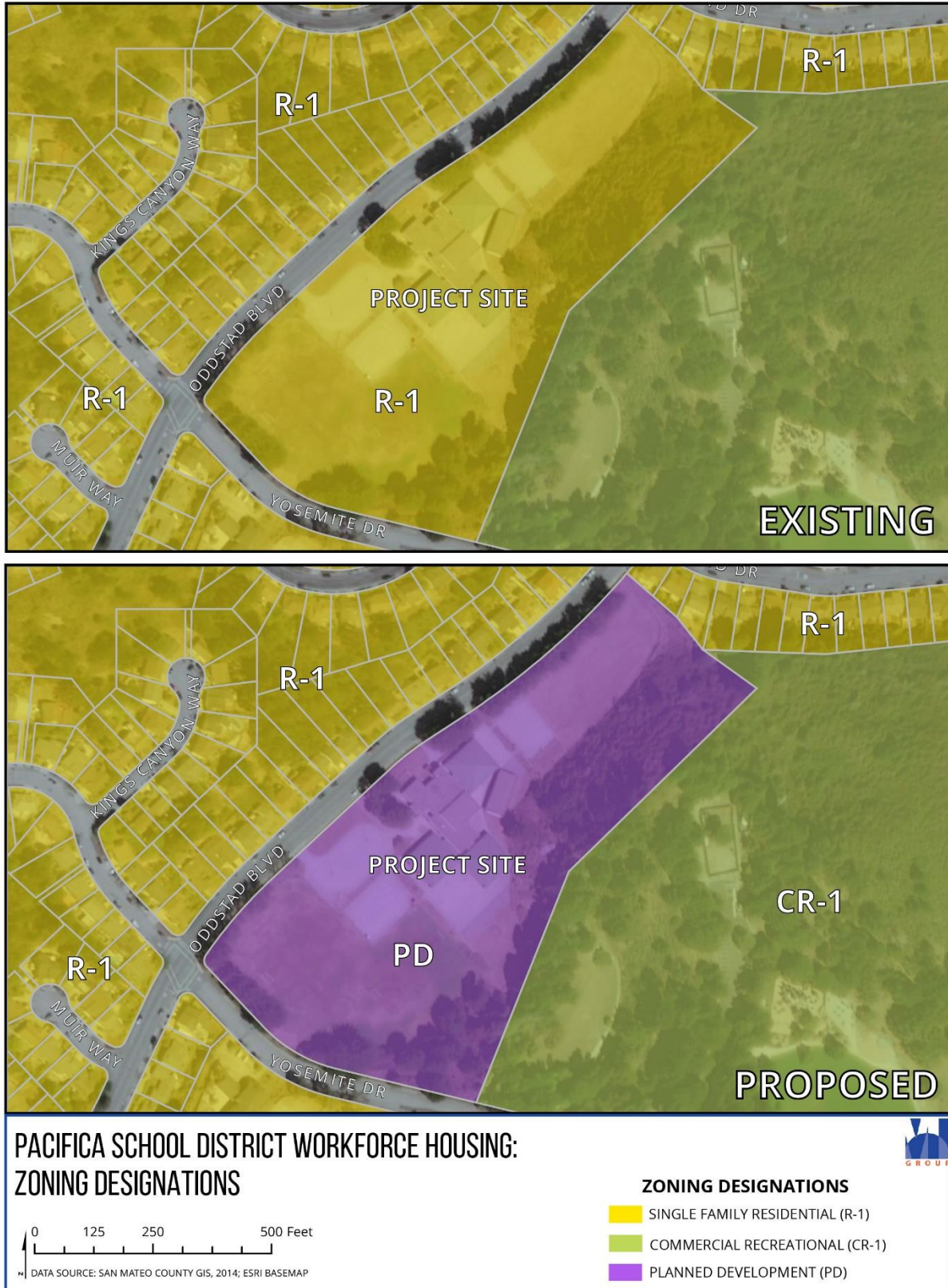


FIGURE 3-3





FIGURE 3-4



### 3.3 PROJECT COMPONENTS

This section of the DEIR provides a description of the proposed project as presented in the application materials submitted to the City of Pacifica by the project sponsor including architectural, civil, and landscape plans dated May 11, 2021 (Appendix 3-A), the Vesting Tentative Parcel Map dated February 1, 2021 (Appendix 3-B), and other supporting documentation.

#### 3.3.1 OVERVIEW

The project proposes to demolish the existing, non-operational elementary school located on the 12.49-acre site at 930 Oddstad Boulevard, and to construct 70 residential units, 11 of which will be below market rate (BMR), affordable to low- and moderate-income households, consistent with Article 47 (Below Market Rate Program) of Chapter 4 of Title 9 of the Pacifica Municipal Code. In addition to BMR units, the project will allocate an additional 34 units, for teachers and staff of PSD which will be subsidized by the School District. Up to 25 units will be rented at market-rate to occupants other than teachers and staff of PSD. The project will also provide community amenities including a recreation building, restroom and changing room, office, site improvements such as landscaping and parking, and off-site improvements along the Oddstad Boulevard right-of-way, as further discussed in Section 3.3.4, below. The site's zoning classification will be amended from Single-Family Residential (R-1) to Planned Development District (P-D), details of which are included in Section 3.5.2.

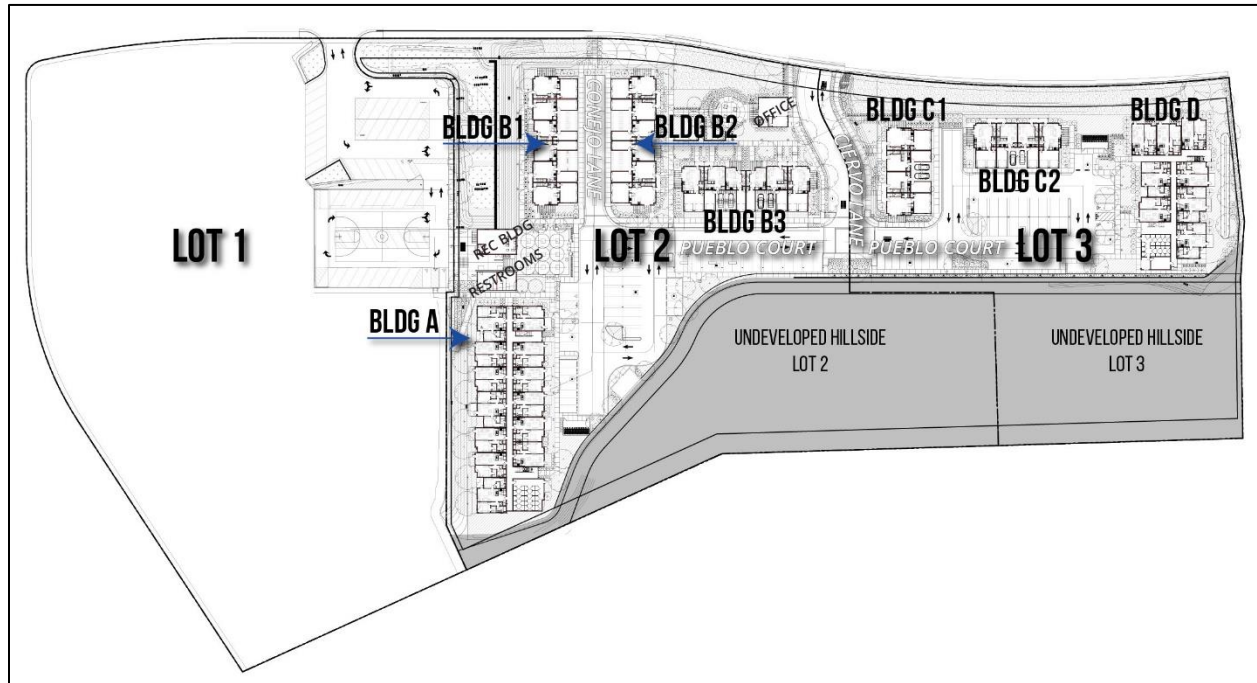
The project sponsor is requesting the option to construct and implement the project in two phases to provide flexibility given the changing economic conditions in the area. Though there is a possibility that the project will be constructed in two phases, the entirety of the development is being analyzed in the EIR.

#### 3.3.2 SITE PLAN AND COVERAGE

The project includes a three-lot subdivision totaling 12.49-acres, comprised of Lot 1 (5.02-acres), located at the southern portion of the project site; Lot 2 (4.69-acres), located in the central portion of the site; and Lot 3 (2.78-acres), located at the northern portion of the site as shown in Figure 3-5 below. The project will preserve approximately 2.13-acres of the site as undeveloped hillside along the eastern property line, with the proposed residential development and recreational field occupying the remaining 10.36 acres. Table 3-1 summarizes the project's site coverage using broad development categories to capture coverage of the site by buildings (residential, accessory, and amenity), circulation improvements (parking, drive aisles, driveways, etc.), landscaping (ornamental and

stormwater treatment), and open space and undeveloped hillside areas.

**FIGURE 3-5: PROPOSED SITE PLAN<sup>2</sup>**



**TABLE 3-1: SITE DEVELOPMENT TOTALS**

	<b>Lot 1</b>	<b>Lot 2</b>	<b>Lot 3</b>
<b>Buildings</b>	-	31,879 s.f.	17,326 s.f.
<b>Circulation Improvements</b>	31,182 s.f.	55,942 s.f.	33,567 s.f.
<b>Landscaping</b>	1,480 s.f.	51,083 s.f.	27,913 s.f.
<b>Open Space &amp; Undeveloped Hillside</b>	185,926 s.f.	65,372 s.f.	42,398 s.f.
<b>TOTALS</b>	<b>218,588 s.f.</b>	<b>204,276 s.f.</b>	<b>121,204 s.f.</b>

*Calculations in Table 3-1 are based on Sheet A1.1, and L1.3, of Appendix 3-A, dated May 11, 2021*

### **3.3.3 ARCHITECTURAL DESIGN AND BUILDING FLOOR PLANS**

#### ***Residential Buildings***

The project proposes construction of seven craftsman-style residential buildings in four varying layouts, identified as Buildings A (1 building), B (3 buildings), C (2 buildings), and D (1 building). All residential structures are two-stories, ranging in height from 25-feet 3 ¾-inches to 30-feet, as measured from finished grade to the highest point of the gable roof, consistent

<sup>2</sup> Sheet A0.2, Project Drawings, prepared by BDE Architecture, May 11, 2021

with the City of Pacifica Municipal Code.<sup>3</sup> Buildings feature roof forms of varying height, slope, and orientation. Colors and materials include asphalt shingle roofs in black and grey, horizontal lap siding in blue and grey, fiber cement shingle siding in two shades of brown, fiber cement trim in white, sectional garage doors in blue, wood trellises, divided light vinyl windows, and cylindrical wall sconces. Residential buildings are summarized in Table 3-2 below including the type of units (e.g., flats vs. townhomes) where flats are apartments that include a single level of livable space per unit, and townhomes include two floors of livable space per unit.<sup>4</sup> In addition to the type of units, the table also includes a summary of the overall square-footage, total number of units, and unit mix of each building.

**TABLE 3-2: RESIDENTIAL BUILDING DETAIL**

*Lot 2 Buildings*

Building A (Flats):

- 26,385 square feet
- 27 units
  - ♦ 21 one-bedroom
  - ♦ 6 two-bedroom

Building B1, B2, B3 (Townhomes):

- 7,370 square feet each (22,110 square feet total)
- 6 units each (18 units total)
  - ♦ 4 two-bedroom
  - ♦ 2 three-bedroom

*Lot 3 Buildings*

Building C1, C2 (Townhomes):

- 5,142 square feet each (10,284 square feet total)
- 4 units each (8 units total)
  - ♦ 2 two-bedroom
  - ♦ 2 three-bedroom

Building D (Flats):

- 19,392 square feet
- 17 units
  - ♦ 11 one-bedroom
  - ♦ 6 two-bedroom

***Accessory and Amenity Buildings***

The project proposes construction of accessory and amenity buildings, including bike storage and refuse enclosures, one of each type on Lots 2 and 3, and three amenity buildings on Lot 2, including an approximately 1,015 square-foot recreation building, 800 square-foot restroom and changing room, and 900 square-foot office. Amenity buildings range in height from 16-feet 5 <sup>3</sup>/<sub>4</sub>-inches to 23-feet 11 <sup>3</sup>/<sub>4</sub>-inches and feature simple architecture that is complementary to that of the residential buildings including asphalt shingle roofs, horizontal

<sup>3</sup> City of Pacifica Municipal Code, Title 9 – Planning and Zoning, Chapter 4 – Zoning, Article 2 – Definitions, Section 9-4.243 – Height of Buildings

<sup>4</sup> As used here, “townhomes” refer to a type of building and not to a form of ownership housing (i.e., condominiums). All residential units proposed with the project are rental units.



lap siding, fiber cement trim, wood trellises, divided lite vinyl windows, and cylindrical wall sconces. As proposed, the recreation building and office will be used exclusively by residents of the project, however, the restroom and changing facilities will be available for use by the public and in particular are intended to support the publicly accessible recreational portion of the project, further described in Section 3.3.4. The School District may also make the recreation building available for rental by community groups or private parties on a case-by-case basis.

### **3.3.4 RECREATIONAL AMENITIES**

The project includes several recreational amenities onsite. Publicly accessible amenities include two play fields, measuring approximately 127,825 square feet, located at the southern portion of the site and one informal basketball practice court in the parking area of Lot 1. As proposed, the existing, approximately 53,167 square foot recreational field located at the northern portion of the site and the existing basketball court located adjacent to the school complex will be removed to accommodate the proposed residences and associated improvements on Lots 2 and 3. In addition to the recreational amenities on Lot 1, the public will also have access to the proposed changing rooms and restroom building proposed on Lot 2.

Resident recreation amenities are located on Lot 2 and include the recreation building, and three common outdoor patios including a lower patio with game courts located south of the recreation building, an upper patio with outdoor seating located north of the recreation building, and a patio with outdoor seating located between Oddstad Boulevard to the west and Building B3 to the east. See the Conceptual Landscape Plan provided at Sheet L1.0 of Appendix 3-A for a detailed site plan showing locations of onsite recreational amenities.

### **3.3.5 ACCESS, CIRCULATION, AND PARKING**

#### ***Vehicular Access and Circulation***

Vehicular access to and from the residential portion of the project site (Lot 2 and Lot 3) will be provided via a new, approximately 25-foot-wide driveway with additional 8 ½ feet of width for parallel parking along the south (inbound) side located 340 feet south of the Oddstad Boulevard/Big Bend Drive intersection. The existing driveway used to access the former school is located approximately 70 feet south of the proposed driveway and will be replaced with standard curb, gutter, and sidewalks. The project proposes to introduce internal roadways and drive aisles including Ciervo Lane, which is oriented east-west and provides access to the site from Oddstad Boulevard; Pueblo Court, which is oriented north-south and

provides access to Building A, Building B3, the community recreation building, and the recreation restroom on Lot 2 as well as Buildings C1, C2, and Building D on Lot 3; and Conejo Lane which is oriented east-west and provides access to Buildings B1 and B2 on Lot 2. Internal roadways and drive aisles are shown in Figure 3-5 above.

Vehicular access to and from the recreational portion of the project site (Lot 1) will be provided by way of an existing, approximately 25-foot-wide driveway located approximately 225 feet north of the Oddstad Boulevard/Yosemite Drive intersection. Improvements to the existing driveway are limited to installation of curb ramps.

Table 3-3 includes a summary of the total vehicular parking spaces provided by the project including the 54 existing parking spaces on Lot 1 which will be restriped and retained as part of the project, 86 parking spaces on Lot 2, and 56 parking spaces on Lot 3, for a total of 196 parking spaces, inclusive of covered and uncovered spaces where "S" indicates standard parking spaces, "C" indicates compact spaces, and "A" indicates ADA spaces.

**TABLE 3-3: PARKING SUMMARY**

<b>Lot</b>	<b>Uncovered (S)</b>	<b>Uncovered (C)</b>	<b>Uncovered (A)</b>	<b>Covered (S)</b>	<b>Covered (C)</b>	<b>Covered (A)</b>	<b>Total</b>
<b>1</b>	49	2	3	-	-	-	<b>54</b>
<b>2</b>	8	12	2	61	1	2	<b>86</b>
<b>3</b>	7	2	2	45	-	-	<b>56</b>
<b>Sum</b>	<b>64</b>	<b>16</b>	<b>7</b>	<b>106</b>	<b>1</b>	<b>2</b>	<b>196</b>

Covered parking spaces are provided in the form of private garages in Buildings B1, B2, B3, C1, and C2 as well as detached, approximately 8-foot tall, covered carports with corrugated metal roofs and galvanized steel columns in the parking lot areas of Lots 2 and 3 (see Sheet A6.0 of Appendix 3-A).

### ***Bicycle and Pedestrian Access and Circulation***

Bicycle and Pedestrian access to the site is provided by way of existing facilities along Oddstad Boulevard including Class II bicycle lanes extending from south of the site at Terra Nova Boulevard to north of the site beyond at the terminus of Oddstad Boulevard, as well as existing sidewalks on both sides of Oddstad Boulevard for the extent of the public right-of-way. Upon entering the project site, bicyclists may utilize the proposed project roadways to access secure bicycle parking areas at the southeast portion of Lot 2 and the northwest portion of Lot 3. Sidewalks are proposed throughout the site including on either side of the entry roadway (Ciervo Lane), throughout the proposed parking areas, and adjacent to all

proposed buildings. In addition to the main project entry, pedestrians may access the site via the proposed stairs along Oddstad Boulevard adjacent to Buildings B1 and B2, connecting to the remainder of the site via Conejo Lane.

### ***Bicycle Parking***

The project includes two common-use, enclosed bicycle parking areas each accommodating up to 18 bicycles, as well as a two bike racks each accommodating two bicycles located on the lower community patio adjacent to Lot 1, and one located adjacent to Ciervo Lane near the proposed office. In total, the project provides 40 bicycle parking spaces.

## **3.3.6 LANDSCAPING, LIGHTING, SIGNAGE, AND FENCING**

### ***Landscaping***

An arborist report was prepared for the project by Jennifer Tso of Traverso Tree Service, dated March 18, 2020 documenting and evaluating all trees onsite, including those within 20-feet of the proposed development and along the Oddstad Boulevard street frontage. As noted in the arborist report, of the 27 trees surveyed, 22 are Monterey cypress, four are Monterey pine, and one is a Peruvian pepper. As proposed, the project will remove seven trees, including five Monterey cypress, one Monterey pine, and the Peruvian pepper.

In addition to removal and replacement of trees, the project proposes landscaping throughout the site including along the Oddstad Boulevard frontage, along the northern property boundary, between Lot 1 and Lot 2, in the parking area of Lot 1, and throughout the proposed parking and residential areas on Lots 2 and 3. The total landscaped area across the three proposed lots is 66,574 square feet, which accounts for approximately 12% of the 12.49-acre site and is inclusive of trees, shrubs, groundcovers, vines, and bioretention areas, all of which require low to moderate water use. Stormwater management is further discussed in Section 3.3.7, below.

### ***Lighting***

The project includes site and building lighting including 10- to 12-foot pole lights, three-foot bollard lights, flood lights directed toward proposed wayfinding and project identification signage, integrated under canopy lighting at proposed carports, and cylindrical wall sconces at the proposed buildings.

### ***Signage***

The project proposes an approximately 8.5-foot tall by 8-foot-wide project identification sign

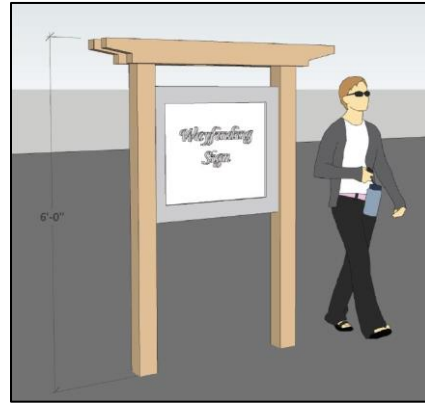


at the entrance to the residential portion of the site as well as an approximately 6-foot wayfinding sign located at the terminus of Ciervo Lane. See Figure 3-6 and Figure 3-7 for details on proposed signage.

**FIGURE 3-6: PROJECT IDENTIFICATION SIGN**



**FIGURE 3-7: PROJECT WAYFINDING SIGNAGE**



### ***Fencing***

The project proposes to remove the existing chain link fencing located around the northern recreational field and will replace fencing in this area with a new fence consistent with the proposed residential use. Existing wood fencing located between residences to the north along Big Bend Drive and the project site will remain. Existing chain link fencing around the southern recreational field will be repaired and replaced as needed but will remain in its current design and location consistent with the existing and proposed recreational use. In addition, the project will install a four-foot decorative concrete masonry unit (CMU) retaining wall between Lot 1 and Building B1, a six-foot ornamental metal fence and gates with CMU and veneer pillars at the upper community patio located directly east of Building B1, and a CMU retaining wall ranging in height from 4- to 10-feet between the undeveloped eastern portions of Lots 2 and 3 and the proposed residential areas.

### **3.3.7 STORMWATER MANAGEMENT**

Stormwater management is required both during and after construction, throughout the life of a development project. Stormwater regulations are further discussed in 4.10 Hydrology and Water Quality. The project's proposed stormwater management during construction and at operation are discussed in detail below.

### ***Construction***

Consistent with the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP)

and the State Water Board's Construction General Permit Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ, the project will implement best management practices (BMPs) throughout construction of the project. BMPs to be implemented are detailed on Sheet C8.0 of Appendix 3-A and include several measures including installation of fiber rollers between the proposed development and the undeveloped area along the eastern portion of Lots 2 and 3 to prevent erosion of the sloped area, as well as installation of storm drain inlet protections to eliminate runoff of sediment, construction debris, and other materials into the storm drain system.

### ***Operation***

In addition to implementation of BMPs during construction, the SMCWPPP also requires stormwater management throughout operation of the project and can be satisfied through the use of self-retaining, self-treating, and bioretention areas. The project includes self-retaining areas (5,586 square feet), self-treating areas (299,861 square feet), and bioretention areas (6,949 square feet) across the three proposed lots.

Self-retaining areas are defined as portions of the development site that retain the first inch of rainfall without producing stormwater runoff and may also receive runoff from adjacent impervious areas of the site.<sup>5</sup> The project contains one self-retaining area south of Ciervo Drive near the proposed office building.

Self-treating areas include portions of the development site where natural processes remove pollutants from stormwater.<sup>6</sup> The project includes five self-treating areas which comprise the majority of Lot 1, excluding the parking area, the undeveloped portions of Lots 2 and 3 along the eastern boundary of the site, and the northeast portion of Lot 3 adjacent to Building D.

Bioretention areas are a type of biotreatment measure designed to evapotranspire or infiltrate stormwater with the remainder of runoff being filtered and released back into the storm drain system.<sup>7</sup> The project includes five bioretention areas located throughout the site including a 221 square foot area between Building D and the northern property line, a 2,770 and 2,710 square foot areas between the parking area of Lot 1 and Building B1, and a 646 and 602 square foot areas located within the parking area of Lot 1.

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<sup>5</sup> C.3 Regulated Projects Guide, San Mateo Countywide Water Pollution Prevention Program, Version 1.0, January 2020, Glossary of Terms, page x.

<sup>6</sup> Ibid., page x.

<sup>7</sup> Ibid., page ii.

### **3.3.8 UTILITIES**

The project will connect proposed onsite utility lines to existing water, sanitary sewer, and storm drain utilities located within the Oddstad Boulevard public right-of-way. To accommodate the proposed development, the project will install two new sewer laterals with manholes, four fire hydrants and water lines, three domestic water laterals (two eight-inch and one 2.5-inch), and one storm drain lateral within the Oddstad Boulevard public right-of-way. Proposed sewer laterals will connect from Conejo Lane (project roadway between Buildings B1 and B2) to Oddstad Boulevard, and from Ciervo Lane (residential project entry roadway) to Oddstad Boulevard. Fire hydrants and associated water lines will be evenly spaced within the right-of-way between Lots 2 and 3. Water laterals will extend from Ciervo Lane to Oddstad Boulevard, northwest of Building B2 to Oddstad Boulevard, and north of the bike storage area on Lot 3 to Oddstad Boulevard. The project proposes to connect to an existing storm drain outfall near the entry drive along Oddstad Boulevard, and existing storm drain outfall near the existing parking lot adjacent to the southern recreational field. A new storm drain lateral will be constructed adjacent to the northern project boundary and will extend to the existing storm drain located within the Oddstad Boulevard right-of-way.

### **3.3.9 FUEL MANAGEMENT AND WILDLAND URBAN INTERFACE REQUIREMENTS**

As proposed, the project is designed to provide 100-feet of fire defensible space between the proposed residential portion of the project, and the eastern property line lying immediately adjacent to the City owned and operated Frontierland Park. In addition, the project will be required to comply with California Building and Fire Code requirements applicable to projects located within the Wildland Urban Interface (WUI) as set forth in Chapter 7A of the California Building Code. In particular, this section of the CBC sets forth regulations related to vegetation management, non-combustible materials, and the location of vents, among other requirements, which are intended to increase fire resistance of buildings located within the WUI.

### **3.3.10 DEMOLITION AND PROJECT CONSTRUCTION**

#### ***Demolition***

The project proposes to demolish and/or remove onsite improvements including the approximately 34,000 square-foot school building, 3,600 square foot modular building, 66,000 square feet of asphalt concrete (AC) paving, and 23,000 square feet of concrete paving. As proposed, the project would result in 5,230 cubic yards (cy) of material export and 7,090 cy of import for a net import of 1,860 cubic yards. As currently proposed, demolition

activities are anticipated to occur between December 2022 and May 2023.

### ***Construction***

The project applicant, as part of the Development Agreement (discussed in further detail in Section 3.5), is requesting that phased construction be allowed for the project to account for potentially adverse economic conditions that may be in place at the time construction permits are being sought. Construction of the project is anticipated to commence following demolition activities and would occur between May 2023 and July 2024 with initial occupancy in August 2024. As noted in the Development Agreement prepared for the project, the timeline for the second phase of construction is yet to be determined, but construction could commence as long as 12 years from project approval. The applicant has requested up to 30 months from issuance of a building permit for Phase 2 to complete construction. For the purposes of this analysis, construction of the project is assumed to occur in a single phase over an 8-month period. If construction occurs in two phases, as outlined in the Development Agreement further discussed in Section 3.5.1, Phase 1 and 2 would be as detailed below:

#### *Phase 1*

- Four residential buildings providing 45 units, 11 of which will be below market rate affordable to low- and moderate-income households (see 3.3.3 for additional floor plan details):
  - ♦ Building A (27 units)
  - ♦ Buildings B1, B2, and B3 (6 units each)
- Three residential amenity buildings:
  - ♦ Recreation Building (1,015 square-feet)
  - ♦ Changing Room & Restroom Building (800 square-feet)
  - ♦ Office (900 square-feet)
- Bike storage
- Refuse enclosure
- Surface parking and circulation improvements
- Usable open space
- Landscaping
- Recreational fields
  - ♦ Restripe parking areas and basketball court
  - ♦ Install curb ramps at existing driveway
  - ♦ Repair and replace existing concrete drainage ditch

### *Phase 2*

- Three residential buildings providing 25 units
  - ♦ Buildings C1 and C2 (4 units each)
  - ♦ Building D (17 units)
- Bike storage
- Refuse enclosure
- Surface parking and circulation improvements
- Usable open space
- Landscaping

## **3.4 PROJECT OBJECTIVES**

The following project objectives have been identified:

- Provide high-quality housing for current and future staff members of the School District
- Provide rental rates and lease terms that enable and improve the School District's ability to retain and attract qualified faculty and staff
- Redevelop the underutilized site in response to the declining school-age population and provide workforce housing for the School District's staff
- Contribute to the City of Pacifica's Regional Housing Needs Allocation (RHNA) goals by providing six (6) low income, five (5) moderate income, and 59 above-moderate income (e.g., market rate) units
- Maintain and expand recreational opportunities on site for use by the surrounding neighborhood, future residents, and organized recreational groups
- Optimize assets for the School District to support its education mission

## **3.5 PROJECT ENTITLEMENTS**

### **3.5.1 DEVELOPMENT AGREEMENT**

As prescribed in Article 50 (Development Agreements) of Chapter 4 of Title 9 of the Pacifica Municipal Code, the applicant is requesting approval of a Development Agreement for the proposed project. A Development Agreement is a legislative item. The Development Agreement will require review and recommendation by the City's Planning Commission with final approval by the City Council. The Development Agreement is intended to provide assurances to the developer that the project can be developed in accordance with the policies, rules, and regulations in place at the time of approval and that development can be undertaken on the timeline specified in the Development Agreement. The Development Agreement is also intended to provide for certain public benefits that are not standard requirements of the development review process. All aspects of, and contemplated development actions described in the Development Agreement will be consistent with the

project description and the scope of analysis covered by the DEIR.

The proposed Development Agreement would:

- Have a term of 25 years
- Allow construction of Phase 1 to begin within 7 years of approval and Phase 2 to begin within 12 years of approval.
- Allow the project to be constructed in accordance with the local laws in effect at the time of approval for the term of the Development Agreement.
- Provide public recreational facilities of approximately five acres in size, in excess of the 1.4 acres the City can require as part of the proposed subdivision.
- Require that the additional public recreational facilities be available for public use for a period of not less than 20 years.
- Provide the City an opportunity to purchase the additional public recreational facilities at a specified price before they may be converted into a non-school use.

### **3.5.2 REZONING**

The project proposes to change the site's zoning designation from R-1 to P-D. As described in Article 22 (Planned Development District) of Chapter 4 of Title 9 of the City's Municipal Code, the P-D District is intended to allow diversification of the relationships of buildings and open spaces in planned building groups, while also ensuring compliance with the district regulations and provisions of the Zoning Chapter of the Municipal Code. As provided therein, the amenities and compatibilities of the P-D District shall be ensured through the adoption of a development plan and specific plans<sup>8</sup> showing proper orientation, desirable design character, and compatible land uses. A rezoning is a legislative item that requires review and recommendation by the Planning Commission with approval by the City Council.

#### ***Development Plan***

As previously stated, establishment of a Planned Development District requires concurrent application of a Development Plan. A Development Plan is a legislative item that establishes site-specific zoning standards within a P-D district. The Development Plan is required to include the information listed below and is subject to review and recommendation by the Planning Commission and approval by the City Council.

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<sup>8</sup> For purposes of Article 22, a "specific plan" is a local development permit and is not a reference to specific plans in State Planning & Zoning Law.

- The circulation pattern, indicating both public and private streets;
- All parks, playgrounds, school sites, public buildings, open space, and other such uses;
- The land uses, indicating the approximate areas to be used for various purposes, the acreage and percentage of total area in each land use, the population densities, the lot area per dwelling unit (excluding public street area), the percentage of area covered by buildings, pavement, and grading, and land uses on adjacent parcels;
- A map showing the topography of the proposed district at one foot contour intervals in areas of cross slope of less than five (5%) percent, at two (2') foot contour intervals in areas of five (5%) percent through ten (10%) percent cross slope, and at five (5') foot contour intervals in areas exceeding ten (10%) percent cross slope;
- The following studies of the proposed development:
  - ♦ A cost revenue analysis for any residential or institutional project,
  - ♦ A market analysis for proposed commercial developments;
  - ♦ A completed environmental information form in accordance with CEQA Guidelines to allow the City to make a determination that the project is categorically exempt, that a negative declaration be prepared, or that an environmental impact report is necessary. If an environmental impact report is necessary, the applicant shall deposit the necessary funds with the City for the completion of such report;
  - ♦ A general list of price ranges (both sale and rental) for proposed residential developments; and
  - ♦ A geological and soils analysis which shall contain an adequate description of the soils and geology of the site and conclusions and recommendations regarding the effect of the soil and geological conditions on potential grading, excavations, street and utility improvements, and structures.

### ***Specific Plan***

In addition to the Development Plan, application for a Planned Development District also requires concurrent submittal of an application for a Specific Plan<sup>9</sup> which is subject to review and approval by the Planning Commission who must find that the Specific Plan is consistent with the Development Plan and the City's adopted Design Guidelines. Submittal of a Specific Plan requires the following information:

- A tentative subdivision map;

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<sup>9</sup> Ibid.

- Proposed landscaping and irrigation plans;
- Proposed engineering plans, including site grading, street improvements, drainage, and other public utilities, which plans, when approved by the Commission shall not be construed to mean that the plans will constitute the final improvement plans for the subdivision. The City Engineer, after detailed design studies, may require modifications and/or additional plans and specifications. Such additional requirements requested by the City Engineer after the design studies may be made without a public hearing if such additional requirements clearly follow the spirit and intent of the approved specific plan;
- Proposed building plans, including floor plans and exterior elevations indicating the materials, color schemes, and treatment of surfaces;
- Proposed plans for recreational facilities;
- Proposed parking plans;
- Proposed plot plans, showing building locations on each lot, building setbacks, and lot dimensions;
- Where applicable, as a result of findings on site conditions and detailed site planning, supplemental information or revisions to the environmental impact report prepared pursuant to the provisions of the State and City EIR guidelines; and
- Other information as indicated on the prescribed form by the Planning Administrator. A specific plan application shall be submitted concurrently with the development plan application. A specific plan application may be submitted subsequent to approval of the development plan if the Planning Commission finds that the later submittal will provide for the implementation of the development plan and is warranted in terms of the proposed development, or units thereof, in accordance with the regulations and limitations set forth in this article.

### **3.5.3 VESTING TENTATIVE PARCEL MAP**

As proposed, the project will subdivide the existing 12.49-acre parcel into three lots. As detailed in Article 7 (Vesting Tentative Maps) of Chapter 1 of Title 10 of the City's Municipal Code, residential developments may, but are not required, to submit an application for a Vesting Tentative Map which confers a vested right to proceed with development in substantial compliance with the ordinances, policies, and standards enacted or instituted as a result of those proceedings which are in effect on the date the City determined that the application is complete.<sup>10</sup> The Vesting Tentative Parcel Map will be considered concurrently

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<sup>10</sup> California Government Code, Title 7. Planning And Land Use [65000 - 66499.58], Division 2. Subdivisions [66410 - 66499.38], Chapter 4. Requirements [66473 - 66498], Article 1. General [66473 - 66474.10], Section 6647.2(b)(2)



with all other discretionary approvals described in this Section.

### **3.6 INTENDED USE OF THE EIR**

This Draft EIR is an informational document for the public and decision makers. The City of Pacifica, as the Lead Agency, will use information presented in the EIR, along with other information in the record, to certify that environmental impacts of the project have been adequately considered. Prior to acting on the requested entitlements the City of Pacifica's Planning Commission and City Council will hold at least one public hearing each to consider the requested project entitlements and will concurrently determine whether to certify the EIR. In addition to the Lead Agency, this Draft EIR may also be utilized by Responsible and Trustee Agencies, including the following:

- Regional Water Quality Control Board (RWQCB)
- California Department of Fish and Wildlife (CDFW)
- United States Fish and Wildlife Service (USFWS)

### **3.7 APPENDICES**

- Appendix 3-A: Project Drawings, prepared by BDE Architecture, May 11, 2021
- Appendix 3-B: Vesting Tentative Parcel Map, prepared by BKF Engineers, February 1, 2021
- Appendix 3-C: Arborist Report, prepared Traverso Tree Service, March 18, 2020

### **3.8 REFERENCES**

1. C.3 Regulated Project Guide, San Mateo Countywide Water Pollution Prevention Program, Version 1.0, January 2020
2. California Government Code, Title 7. Planning And Land Use [65000 - 66499.58], Division 2. Subdivisions [66410 - 66499.38], Chapter 4. Requirements [66473 - 66498], Article 1. General [66473 - 66474.10], Section 6647.2(b)(2)
3. City of Pacifica Municipal Code:
  - a. Title 4, Chapter 12, Section 4-12.02
  - b. Title 9, Chapter 4, Article 2, Section 9-4.243
  - c. Title 9, Chapter 4, Article 22
4. San Mateo County Recorder, Park Pacifica Highlands No. 1, Volume 63, Pages 13-15



# 4.0 ENVIRONMENTAL EVALUATION

This Chapter of the Draft Environmental Impact Report (DEIR) presents an analysis of each resource topic that has been identified through preliminary environmental analysis and the public scoping process as likely to be affected by the proposed project. Each topical section describes the regulatory framework for evaluating that specific environmental topic, summarizes the existing environmental setting, analyzes potential impacts that could result from implementation of the proposed project, and identifies mitigation measures that would avoid, reduce, or compensate for the significant impacts of the proposed project.

## 4.1 BACKGROUND

Following determination of application completeness for the project, the City Council of the City of Pacifica adopted the 2040 General Plan on July 11, 2022. California law requires that the City apply local land use regulations in effect at the time the vesting tentative parcel map was deemed complete. Therefore, the DEIR utilizes the 1980 General Plan for purposes of review under the California Environmental Quality Act (CEQA). Each topical area discusses the project within the regulatory context of the 1980 General Plan, except that portions of the DEIR rely upon the 2040 General Plan land use designation for the site (Low Density Residential), which was the land use designation requested by the applicant as part of the initial entitlement requests.

## 4.2 LEVELS OF SIGNIFICANCE

Under the California Environmental Quality Act, a variety of terms are used to describe the levels of significance of adverse impacts. The definitions of terms used in this DEIR are as follows:

- **Significant and Unavoidable Impact.** An impact that exceeds the defined standards of significance and cannot be avoided or reduced to a less than significant level through implementation of potentially feasible mitigation measures.
- **Significant Impact.** An impact that exceeds the defined standards of significance and that can be avoided or reduced to a less than significant level through implementation of feasible mitigation measures.
- **Potentially Significant Impact.** Potentially Significant Impacts are impacts where there is uncertainty whether or not they exceed the defined standard of significance; however, for the purpose of this DEIR, they are considered significant. Such impacts are equivalent to Significant Impacts and require the identification of feasible mitigation measures.

- **Less Than Significant Impact.** Impacts that may be adverse but that do not exceed the specified standards of significance.
- **No Impact.** The project would not create an adverse impact to any degree.

### 4.3 FORMAT OF RESOURCE TOPIC SECTIONS

Each environmental topic section considered in this Chapter of the DEIR is organized into the following subsections:

- **Regulatory Context.** The overview of regulatory considerations for each environmental topic is organized by federal, state, and local regulations, including discussions of applicable laws, regulations, and policies.
- **Environmental Setting.** This subsection describes the existing conditions on and within the vicinity of the project site, as applicable. The environmental setting subsection for each environmental topic provides a description of the applicable physical setting of the project area and its surroundings such as existing land uses, existing soil conditions, existing traffic conditions, etc.
- **Thresholds of Significance.** This subsection includes the thresholds of significance contained in the most recent Appendix G Checklist of the CEQA Guidelines and are used to analyze the project's potential to result in significant environmental impacts.
- **Analysis, Impacts, and Mitigation Measures.** This subsection provides a detailed analysis of the project's potential environmental impacts. Impacts are numbered and shown in bold italic type, and mitigation measures are numbered to correspond to the impact. Impacts and mitigation measures are numbered consecutively within each topical section.
- **Appendices.** This subsection provides a list of appendices provided for the resource topic section of the DEIR.
- **References.** This subsection provides a list of references used in the impact analyses for each resource topic section of the DEIR.

### 4.4 TOPICS NOT DISCUSSED FURTHER

Consistent with Section 15128 (Effects Not Found to Be Significant) of the CEQA Guidelines, the following includes a discussion of resource topic areas that were evaluated but determined to not warrant further discussion or analysis in the DEIR. As required, a brief discussion is provided below of the reasons why certain topic areas were determined not to be significant and were therefore not discussed in detail.

#### 4.4.1 AGRICULTURAL AND FORESTRY RESOURCE

***The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use.***

The project site is designated Urban and Built-Up Land on maps prepared pursuant to the Farmland Mapping and Monitoring Program prepared by the California Department of Conservation.<sup>1</sup> Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. There would be no impact.

***The proposed project would not conflict with a Williamson Act contract.***

The project site and adjacent parcels are non-agricultural uses located within the city limits of Pacifica. The project site and adjacent parcels do not meet the use, size, or productivity eligibility criteria for a Williamson Act contract as detailed in the San Mateo County Land Conservation (Williamson) Act, Uniform Rules and Procedures document administered by the San Mateo County Planning and Building Department.<sup>2</sup> Furthermore, as shown on the Williamson Act Parcels Map prepared by the County of San Mateo Department of Planning and Building, there are no Williamson Act contract parcels on or proximate to the site.<sup>3</sup> Therefore, the proposed project would not conflict with any existing Williamson Act contract. There would be no impact.

***The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).***

The project site is zoned Single-Family Residential (R-1) and therefore implementation of the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. There would be no impact.

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<sup>1</sup> California Important Farmland Finder, California Department of Conservation, 2017 maps.conservancy.ca.gov/DLRP/CIFF/, accessed March 2022.

<sup>2</sup> San Mateo County Conservation (Williamson) Act, Uniform Rules and Procedures, Uniform Rule 2: Types of Contracts, Page 14

<sup>3</sup> County of San Mateo Department of Planning and Building, Williamson Act Parcels, data.smcgov.org/Housing-Development/Williamson-Act-Parcels/sq6e-7j5j?category=Housing-Development&view\_name=Williamson-Act-Parcels, accessed March 2022.

***The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.***

The project site was previously developed and contains the now vacant Oddstad Elementary School. The site is currently a non-forest use zoned R-1. Seven trees are proposed for removal, primarily along the site frontage and will be replaced consistent with City regulations. Furthermore, these trees do not constitute forest land. Therefore, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. There would be no impact.

***The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.***

As discussed above, the project site is designated Urban and Built-Up Land on maps prepared pursuant to the Farmland Mapping and Monitoring Program and is not located on a site under an existing Williamson Act contract. As such, the proposed project would have no impact related to the conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance to a non-agricultural use nor would the project conflict with a Williamson Act Contract. Additionally, the site is currently developed with a school complex that is vacant and is designated R-1, a non-forest zoning designation. Therefore, the project would not involve changes to the existing environment which, due to its location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. There would be no impact.

#### **4.4.2 ENERGY**

***The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.***

The proposed project is subject to the California Building Standards Code, including the latest energy efficiency standards and green building standards (Title 24, parts 6 and 11 of the CCR). Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. There would be no impact.

***The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.***

The project will be required to implement the latest state plans and requirements for energy efficiency in new construction. The residences proposed by the project would install energy

conservation features required by California Building Standards Code. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. There would be no impact.

#### **4.4.3 MINERAL RESOURCES**

***The proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.***

The project site is not located in proximity of known mineral resources in the city. Mineral resources in the city are located at Rockaway Quarry which is not located on or adjacent to the project site. The site does not contain mineral resources and therefore the project would not result in the loss of availability of a known mineral resource. There would be no impact.

***The proposed project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.***

The project site is not located on a site delineated on the General Plan as a mineral resource recovery site. There would be no impact.

#### **4.4.4 RECREATION**

***The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.***

The proposed project will provide onsite recreational amenities for residents including a recreation building on Lot 2, a lower patio with game courts, an upper patio with outdoor seating, and a patio with outdoor seating located between Oddstad Boulevard to the west and Building B3 to the east. The existing recreational field located at the southern portion of the project site will be preserved and will be accessible to project residents and the public. The recreational field is approximately 5 acres, which exceeds the 1.4 acres required to satisfy the City's parkland dedication requirements in Article 8 of Chapter 1 of Title 10 of the Pacifica Municipal Code<sup>4</sup>, and the anticipated Development Agreement would ensure that at least 1.4 acres of parkland would remain available to occupants of the proposed project in perpetuity. Improvements to the recreational field include repair and replacement of the

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<sup>4</sup> Sec. 10-1.803(c) the formula for determining the amount of acreage to be dedicated is based on the General Plan standards and shall be two hundredths (.02) acre per unit. The project proposes 70 units ( $0.02 \times 70 = 1.4$  acres)

existing concrete drainage ditch, and restriping the existing parking lot. In addition to the recreational field amenities, a publicly accessible restroom will be constructed on Lot 2 as part of the project. Furthermore, the City-owned and operated Frontierland Park is located immediately adjacent to the site to the east. Given the proposed resident and public recreational facilities that will be provided and improved upon as part of the project as well as the adjacency to the 63-acre Frontierland Park, any increase in use of the existing recreational facilities would not lead to or accelerate substantial physical deterioration of the facility. There would be no impact.

***The project does not include new recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.***

The project will retain and improve the existing recreational field at the southern portion of the site, which will satisfy the direct parkland dedication requirements for the proposed project, and will remain publicly accessible. The project is also adjacent to the Frontierland Park, which will continue to be accessible to existing and future residents. The project includes construction of residential buildings and ancillary recreational facilities that are typical of residential developments but does not include new standalone recreational facilities that will have an adverse physical effect on the environment. There would be no impact.

## 4.5 REFERENCES

1. California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, 2018.
2. City of Pacifica Municipal Code:
  - a. Title 10, Chapter 1, Article 8, Section 10-1.803(c)
3. San Mateo County Land Conservation (Williamson) Act, San Mateo County Planning and Building Department, 2013.
4. San Mateo County Datasets, Williamson Act Parcels, 2016.



## 4.1 AESTHETICS

This section summarizes the regulatory framework for evaluating aesthetic and visual resources, describes the existing visual character of the project site and surrounding area, and analyzes the project's potential to impact aesthetic and visual resources within Pacifica. The following documents were used to analyze the potential impacts that could occur:

- Arborist Report, prepared Traverso Tree Service, March 18, 2020
- Tree Replacement Recommendation Memorandum, Traverso Tree Service, June 17, 2020

### 4.1.1 REGULATORY CONTEXT

#### **State**

##### *California Scenic Highway Program*

The California Scenic Highway Program is administered by the California Department of Transportation (Caltrans) with the purpose of preserving the character of scenic highways and protecting them from changes that may diminish the aesthetic value of adjacent lands. Within the Pacifica city limits, there are no Officially Designated State Scenic Highways, however Caltrans has designated segments of Highway 1 and Skyline Boulevard as "Eligible State Scenic Highways".

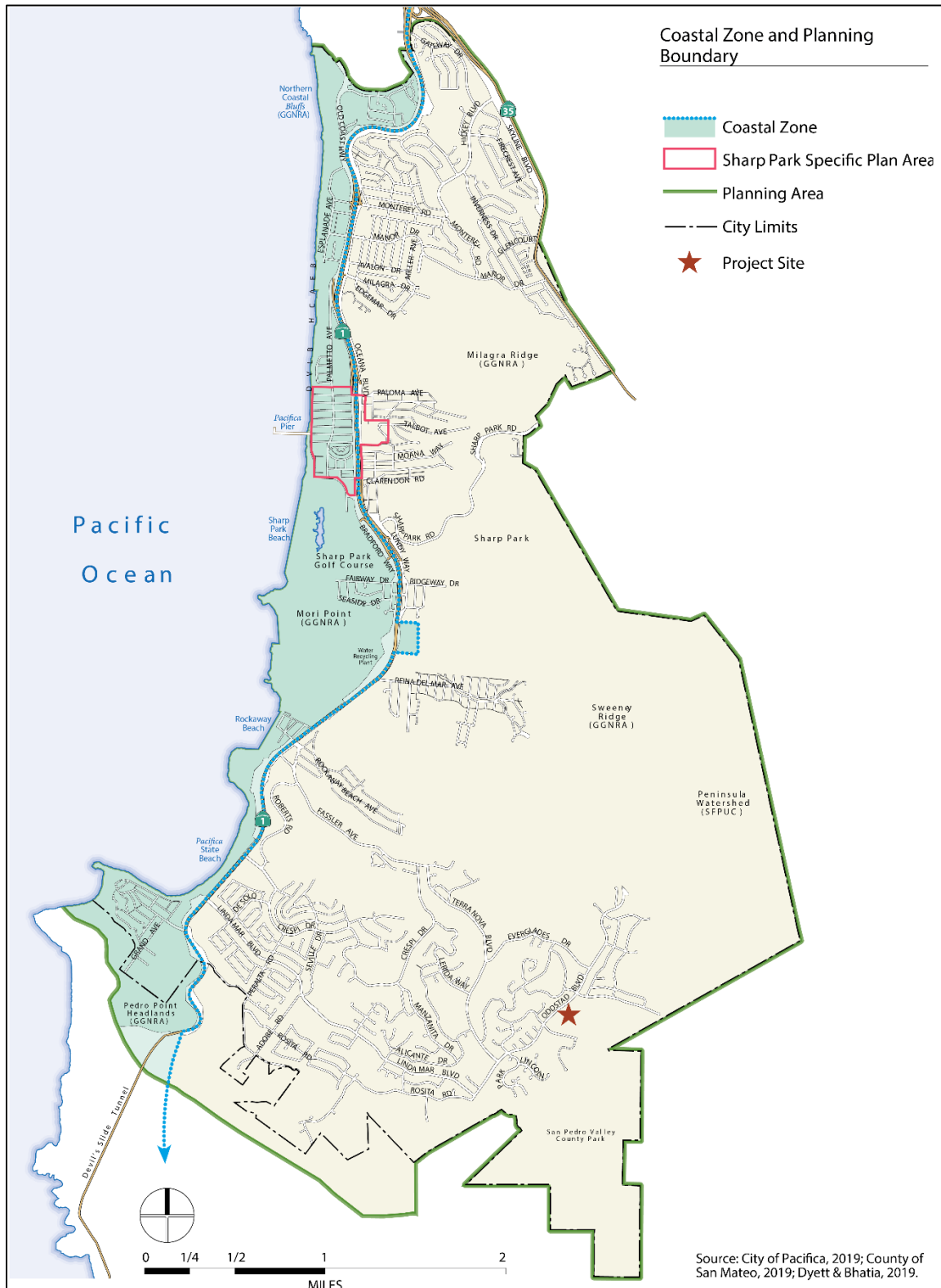
##### *California Coastal Act*

The California Coastal Act of 1976 is administered by the Coastal Commission and other various federal, state, local, nongovernmental, and private agencies. The legislation was enacted to prioritize public access to the shoreline, protect natural coastal resources, and balance conservation with development. The Coastal Act provides guidance on specific topics such as coastal industries and major energy facilities, water quality, wetlands and other sensitive habitats, coastal hazard management, visual resources, and agricultural land preservation.<sup>1</sup>

Statewide implementation of the California Coastal Act resulted in the mapping of the coastal zone, which varies in width from several hundred feet in urbanized areas up to five miles in more rural areas. As shown in Figure 4.1-1, the project site is not located within the coastal zone.

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<sup>1</sup> California Coastal Commission, <https://www.coastal.ca.gov/whoware.html>, accessed February 25, 2022

**FIGURE 4.1-1: COASTAL ZONE AND PLANNING BOUNDARY<sup>2</sup>**

## **Local**

### *City of Pacifica General Plan 1980*

The Scenic Highways and Community Design Elements of the General Plan provide policies, and long- and short-term action programs intended to protect and enhance visual and scenic resources within the city. Though the Scenic Highways element does not include policies or programs particularly relevant to the project, the following Community Design Element policies and programs are applicable to the project:

- Community Design Element
  - ♦ Preserve the unique qualities of the City's neighborhoods.
  - ♦ Encourage the upgrading and maintenance of existing neighborhoods.
  - ♦ Protect the City's irreplaceable scenic and visual amenities.
  - ♦ Require underground utilities in all new development.
  - ♦ Promote the preservation of open space and natural landforms which define the City's residential and commercial areas.

### *Pacifica Municipal Code*

#### **Title 4, Chapter 12 (Preservation of Heritage Trees)**

Title 4, Chapter 12 of the City of Pacifica Municipal Code provides guidance for the preservation of heritage trees to protect and conserve the attractiveness, aesthetic and scenic beauty, and historic atmosphere of the city. At the time of initial application of the project and at the time the project was deemed complete, heritage trees were defined as any tree within the city, except for eucalyptus, which have a trunk circumference of 50 inches or greater (16-inch diameter), when measured 24 inches above natural grade. Heritage trees also include a tree or grove of trees, including eucalyptus, which are designated by resolution of the City Council to be of special historical, environmental, or aesthetic value. On September 12, 2022, prior to the publication of this DEIR, the City Council adopted Ordinance 884-C.S., repealing and replacing Pacifica Municipal Code Chapter 12 - Tree Preservation and Chapter 14 - Maintenance and Preservation of City Trees. As specified in the Ordinance, the definition of heritage trees was altered to include any trees of the species *Quercus agrifolia* (coast live oak), *Quercus lobata* (valley oak), *Aesculus californica* (California buckeye), *Pinus radiata* (Monterey pine), or *Sequoia sempervirens* (redwood), that have a trunk diameter of 12 inches or more. Additionally, any tree of the species *Heteromeles arbutifolia* (toyon) with a 4

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<sup>2</sup> City of Pacifica Draft General Plan 2040, May 2022, page 1-9, Figure 1-2, annotated with project information.

inch or greater diameter at breast height (DBH) is considered a heritage tree under the updated Ordinance. In addition to heritage trees, the Ordinance specifies that protected trees include all trees on public or private property with a trunk diameter of 12 inches or greater at DBH, any heritage tree designated by the director, or any grove of trees.

Removal of or construction within the dripline of heritage trees requires approval of a Heritage Tree Application. In reviewing a request for heritage tree removal or construction within the dripline of a heritage tree, the City considers the conditions related to the health, hazard potential, proximity to existing or proposed structures, or interference with utility services, whether each tree prohibits economically feasible use of the subject property, the topography of the land and the effect of tree removal on it, the ability of the subject property to support each tree, and the contribution of each tree to shade, noise buffers, wind protection, air pollution, historic value, safety, scenic beauty, and general welfare of the area and the city as a whole. To offset the loss of heritage trees, the City may impose conditions for on-site relocation, planting of replacement trees, or payment of fees in lieu of replacement. Additionally, a tree protection plan is required for any development proposal requiring discretionary approvals and must include measures to ensure preservation of trees where possible and protection of trees during construction to maximize chances of survival.

### **Title 9, Chapter 4 (Zoning)**

Title 9, Chapter 4 of the Pacifica Municipal Code provides the City of Pacifica Zoning Regulations and is intended to promote growth in an orderly manner that ensures protection of the public health, safety, comfort, and general welfare. Zoning designations established by this Title implement the City's General Plan, specify permissible land uses, and set forth development standards such as building setbacks and height. Zoning regulations particularly relevant to aesthetics and visual resources and the project are discussed below.

Article 22 of the Zoning Regulations establishes regulations for Planned Development Districts (P-D). The P-D District is intended to allow diversification of the relationships of buildings and open spaces in planned building groups, while also ensuring compliance with the district regulations and provisions of the Zoning Chapter of the Municipal Code. Development standards established for a P-D District are guided by surrounding zoning districts most similar in nature and function to the proposed P-D. Furthermore, amenities and compatibilities of the P-D District are ensured through the adoption of a development plan and specific plans showing proper orientation, desirable design character, and compatible land uses.

Article 28 of the Zoning Regulations provides off-street parking and loading standards, including the number of required parking spaces, location and access to parking facilities, surfacing, screening, lighting, and design standards. Regulations specify that lighting used to illuminate off-street parking areas be directed away from residential properties so as to not create a nuisance. In addition, regulations outline design standards for parking areas including acceptable planting areas and covered parking structures.

#### *City of Pacifica Design Guidelines*

The City's adopted Design Guidelines include design guidance for a variety of development components including, but not limited to site planning, building design, landscaping, hillside development, infill development, and multi-unit development. The Design Guidelines are intended to maintain the quality of development in the city and are used by City staff and the Planning Commission in evaluating the design of new development. The guidelines ensure a minimum standard of design, provide a framework for review of proposed development, implement applicable General Plan and Local Coastal Plan goals and policies, and provide overall direction for the design of new development. Though not an exhaustive list, the following notes specific guidelines related to site planning, building design, and landscaping that are particularly relevant to the proposed project:

#### **Site Planning**

- Locate site improvements such as buildings, parking areas, and walkways to take advantage of desirable site features (e.g. existing healthy trees).
- Buildings should be sited to consider shadows, changing climatic conditions, the potential for passive or active solar energy, safety, and privacy of adjacent outdoor spaces.
- In multi-unit developments, buildings should be located to avoid crowding and to allow for a functional use of the space between buildings.
- Exterior lighting should be subdued and should enhance building design as well as provide for safety and security.
- Exterior trash and storage areas, electrical utility boxes, etc., should be screened from view of all nearby streets and adjacent structures in a manner that is compatible with building and site design. Such facilities should be conveniently located but must not interfere with circulation or parking on the site.

#### **Building Design**

- The style, design, and scale of new buildings should be in character with that of the surrounding neighborhood including relative height, bulk, mass, and density.
- Use architectural features and details to help create a sense of human scale.
- Building color should be compatible with the neighborhood and should reinforce and

complement the visual character of the building's environment.

- There should be architectural consistency among all building elevations.

### **Landscaping**

- Applicants are encouraged to exceed the minimum amount of landscaping required by the Zoning Ordinance and landscape plans should incorporate a variety of plant species.
- Landscaping should be sized so that a mature appearance will be attained within a reasonable time after planting, depending on species and usage.
- Tree and shrub planting should be grouped together to create strong accent points. Formal, linear designs should generally be avoided.
- All parking areas should be landscaped with fast-growing trees and/or shrubs in order to screen vehicles from view and minimize the visual impact of expansive areas of asphalt.
- Where possible, existing landscape elements, such as native and heritage trees, should be retained and incorporated into landscape plans.

#### **4.1.2 ENVIRONMENTAL SETTING**

The project site is located in the southeast portion of Pacifica and is currently developed with a single-story school complex building and associated site improvements. Eastern hillside areas of the project site are undeveloped. Surrounding land uses include single-family residences across Oddstad Boulevard to the west and north, the Pacifica Boys and Girls club and single-family residences to the south across Yosemite Drive, and undeveloped hillside lands and Frontierland Park, an approximately 63-acre City-owned and operated park facility to the east. The project site is located approximately two miles east of Highway 1, which is identified as an Eligible State Scenic Highway. Views from Oddstad Boulevard near the project site include urban uses such as roadways, traffic signals, overhead utility lines, residential development, and background views of undeveloped hillsides and ridgelines, which are partially obstructed from view due to intervening vegetation and existing development.

Traverso Tree Service prepared an Arborist Report on March 18, 2020 (Appendix 4.1-A) which documented and evaluated all trees onsite with a diameter of six inches or more, and which were located within twenty feet of proposed site improvements. As provided in the Arborist Report, of the 27 trees surveyed, 22 are Monterey cypress, four are Monterey Pine, and one is a Peruvian pepper. At the time of preparation of the Arborist Report, 22 of the 27 trees surveyed, met the definition of heritage trees. Under Ordinance 884-C.S., which updated the definition of heritage trees, four of the 27 trees surveyed meet the definition of heritage trees as they are of the Monterey pine species and meet the size requirements specified above, and 26 are considered protected trees based on their size. Based on health and

structural conditions identified in the Arborist Report, seven trees are recommended for removal, one of which is a heritage tree (Monterey pine), five are non-heritage protected trees (five Monterey cypress), and one is a non-heritage, non-protected tree (Peruvian pepper).

In addition to the Arborist Report, Traverso Tree Service also prepared a memorandum with recommended replacement trees (Appendix 4.1-B) which identifies suitable replacement species, recommended planting size, and the anticipated time needed to reestablish the existing screening provided by trees proposed for removal. Proposed landscape plans indicate installation of five Monterey cypress along the project site frontage at Oddstad Boulevard, and two Coast live oak near the western property line of Lot 2 adjacent to the proposed Community Recreation Building and basketball court. However, as noted in the memorandum although replacement of the Monterey cypress would provide aesthetic continuity, it is recommended that two alternative species be selected as it is likely for existing issues, including damage to hardscape, multiple competing stems, and root disturbance to occur if Monterey cypress are re-planted. Based on the moderate to fast growing potential, dense canopy, and low to moderate root damage potential, the memorandum recommends replacement with Coast redwood, Coast live oak, or Deodar cedar. In addition, the memorandum recommends a replacement ratio of 1:1 at a size of 15-gallon or 24-inch boxes. Based on the updated Ordinance, a 2:1 replacement ratio will be required for removal of heritage and protected trees, and at the discretion of the City of Pacifica, additional trees may be required to re-establish the existing screening provided by trees to be removed along the Oddstad Boulevard frontage.

#### **4.1.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant impact to aesthetic resources if it would:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
3. Substantially degrade the existing visual character or quality of public views of a site and its surroundings in a non-urbanized areas or conflict with applicable zoning and other regulations governing scenic quality in urbanized areas
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area



#### 4.1.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

Impacts to aesthetics resulting from implementation of the proposed project are discussed below. The following impact analysis is based on the existing visual character of the project site and compatibility of the project with scenic elements and aesthetic and visual resources, including scenic vistas, scenic resources, existing visual character and public views in urbanized areas, applicable zoning and other regulations governing scenic quality in urbanized areas, and new sources of substantial light and glare which would impact daytime or nighttime views in the area.

***Impact AES-1: Implementation of the proposed project would not have a substantial adverse effect on a scenic vista (less than significant impact).***

A significant impact may occur if a project were to introduce incompatible scenic elements within a field of view containing a scenic vista or substantially block views of a scenic vista. Although the General Plan does not define the term “scenic vista,” the 1980 General Plan Open Space and Recreation Element identifies views of hillsides and the ocean as important visual resources. The General Plan provides that views of open space are as important as access to open space and viewsheds should be identified and protected.

Hills of the San Pedro and Montara Ranges are located to the south and east, beyond the project site. Existing development proximate to the site is primarily characterized by two-story single-family dwellings of varying architectural styles. The site is currently developed with an existing single-story school complex which will be demolished to accommodate seven two-story multi-family buildings, three one-story amenity buildings, and small accessory structures for bike storage and refuse collection. Proposed residential buildings feature craftsman style architecture ranging in height from approximately 25- to 30-feet, and residential amenity buildings feature complementary architectural styles ranging in height from approximately 16- to 23-feet.

The project will introduce new residential structures to an area predominately characterized by existing residential uses. Although the new residential, amenity, and accessory structures will increase the overall height and lot coverage as compared to existing conditions, it will not introduce an incompatible scenic element to the area. In addition, the project will retain the undeveloped nature of the hillside to the south and east, limiting development of the site to the low-lying areas and will also retain the existing recreational field at the southern portion of the site. Although development of the project would partially obscure lower portions of the hillsides when viewed from Oddstad Boulevard, views of the ridgelines and



mountain peaks would remain perceptible. Therefore, implementation of the project will not result in substantial adverse impacts on a scenic vista and impacts would be less than significant.

***Impact AES-2: Implementation of the proposed project would not substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway (less than significant impact).***

Highway 1 traverses the Pacifica approximately two miles west of the project site. Skyline Boulevard runs coterminous with the northeastern city limit and is located approximately two miles northeast of the site. Although not formally designated within the city, Highway 1 and Skyline Boulevard are identified as Eligible State Scenic Highways by Caltrans. As noted in the 1980 General Plan, formal designation would require a corridor study, establishment of a program to protect and enhance the scenic qualities from the proposed roadway, and adoption of the roadway with its protection program. The site is located approximately two miles east of the Highway 1 corridor and two miles southwest of the Skyline Boulevard corridor. Each corridor is separated from the project site by intervening development and vegetation. Given the intervening development and vegetation, the proposed buildings would not be visible from nor would they obscure scenic resources as viewed from Highway 1 or Skyline Boulevard, which may be formally designated as State Scenic Highways in the future. As such, the project will not substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway and impacts of the project would be less than significant.

***Impact AES-3: Implementation of the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings nor would the project conflict with applicable zoning and other regulations governing scenic quality in urbanized areas (potentially significant impact).***

Existing intervening vegetation and development obscure coastal views west of the project site and views of the San Pedro and Montara mountain ranges south of the project site. Aesthetic and visual resources within, and viewed from, the project site include the hillside ridgelines to the east and south which are mostly obscured by existing vegetation along the western edge of the project site adjacent to Oddstad Boulevard. The proposed project would not be expected to have a substantial adverse impact on panoramic views nor would it create incongruous visual elements as the height and massing of new development would be similar to existing development in the project vicinity. Consistent with the Pacifica Design Guidelines, the proposed seven two-story multi-family buildings are similar in form and

height to surrounding residential development of adjacent neighborhoods. Wall insets and projections, balconies, canopies, compatible varieties of siding and roofing materials, and appropriate colors are employed in the design which contribute to an architectural vernacular that is compatible with surrounding development.

The project's design is also consistent with the Design Guidelines as it proposes to retain healthy street trees, locates parking facilities away from the Oddstad Boulevard frontage, utilizes a variety of new landscaping for shading, screening, and complimentary accents, and provides varied building orientation. Furthermore, **Mitigation Measure AES-1** requires compliance with tree protection measures identified in the Arborist Report as well as recommended replacement trees identified in the Tree Replacement Memo prepared for the project which will ensure protection of the quality of public views of the site and its surroundings. Compliance with applicable Design Guidelines and implementation of measure AES-1 will ensure that development of the proposed project would not degrade the visual quality or character of the area and potential impacts would be less than significant.

***Impact AES-4: The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (less than significant impact).***

The project site is proximate to established residential uses and adjacent roadways, both of which are existing sources of artificial light along Oddstad Boulevard. Introduction of 70 new residential units to the project site will introduce new sources of light and glare as compared to existing conditions, including exterior building lights, lights within landscape areas, pathways, parking lots, and vehicle headlights associated with automobiles accessing the residential and recreational portions of the project.

Although the project will increase artificial light on the project site as compared to existing conditions, consistent with Municipal Code Title 9, Chapter 4 lighting used to illuminate off-street parking areas will be directed away from residences in the vicinity through use of down cast light fixtures and strategic siting behind buildings and landscaping to prevent substantial glare emanating from the project site. Furthermore, other sources of exterior light and glare introduced by the project such as exterior light fixtures on proposed buildings will be shielded by intervening site improvements, fixtures will be downward facing, and will be distributed throughout the project site to avoid overconcentration of lighting in a particular area. Proposed exterior lighting is similar to nearby residential areas, which includes streetlights and exterior building lights.

Based on the design of the project, the introduction of new automobiles and their associated

headlights are not expected to generate a significant amount of light and glare onto adjacent properties. Vehicles circulating throughout the residential portion of the site will be shielded by existing and proposed landscaping located adjacent to Oddstad Boulevard. Properties potentially impacted by headlights would be limited to residences located directly across from project driveways along Oddstad Boulevard including 913, 917, and 921 Oddstad Boulevard located across from the southern driveway used to access the recreational portion of the site, and 945, 949, and 953 Oddstad Boulevard located across from the northern driveway used to access the proposed residence. Although these residences are in direct line with headlights of vehicles accessing the site, the two-story residences contain garages on the ground floor as well as landscaping that will provide screening of automobile headlights exiting the site. In conclusion, the project's potential to result in impacts that would adversely affect day or nighttime views in the area, due to new sources of light and glare, would be less than significant

***Mitigation Measures:***

**AES-1:** All applicable Tree Protection Recommendations set forth in the Arborist Report prepared by Traverso Tree Service on March 18, 2020, for the subject property, including, but not limited to recommendations related to protection of Monterey pines (trees 25-27) and Monterey cypress (trees 1-12, 16-20) during the pre-construction, demolition, foundation, grading, construction, and landscaping phases of the project shall be implemented, except that the tree replacement ratio for removal of heritage and protected trees shall be 2:1. Final grading plans, construction plans, and building plans shall demonstrate that recommendations set forth in the Arborist Report have been incorporated into the final design of the project. Plans shall also demonstrate compliance with the planting size, species, and ratio recommendations set forth in the Tree Replacement Recommendation Memorandum prepared by Traverso Tree Services on June 17, 2020. Protection measures and replacement trees shall be subject to review and approval by the City of Pacifica Planning Department, Planning Commission, and City Council, as applicable.

**4.1.5 APPENDICES**

- Appendix 4.1-A: Arborist Report, prepared Traverso Tree Service, March 18, 2020
- Appendix 4.1-B: Tree Replacement Recommendation Memorandum, Traverso Tree Service, June 17, 2020

#### 4.1.6 REFERENCES

1. California Coastal Commission, Overview, <https://www.coastal.ca.gov/whoweare.html>, accessed February 25, 2022
2. City of Pacifica Design Guidelines
3. City of Pacifica Municipal Code:
  - a. Title 4, Chapter 12: Preservation of Heritage Trees
  - b. Title 9, Chapter 4, Article 22
  - c. Title 9, Chapter 4, Article 28, Section 9-4.2816
4. City of Pacifica, City Council Ordinance 884-C.S.
5. Designated Scenic Route Map for San Mateo County, California Department of Transportation (Caltrans), California Scenic Highway Mapping System;
6. Local Coastal Land Use Plan, Plan Pacifica, <https://www.planpacific.org/local-coastal-program>, accessed February 25, 2022

## 4.2 AIR QUALITY

This section summarizes the regulatory framework for evaluating air quality, summarizes the existing air quality setting in Pacifica, and discusses the potential air quality impacts resulting from implementation of the proposed project. The following documents were used, in part, to analyze potential impacts that could occur:

- Pacifica School District Workforce Housing Construction Community Risk Assessment, prepared by Illingworth & Rodkin, November 17, 2021

### 4.2.1 REGULATORY CONTEXT

#### ***Federal***

##### *Federal Clean Air Act*

The Federal Clean Air Act (FCAA) is the foundation for a national air pollution control effort, and it is composed of the following basic elements: National Ambient Air Quality Standards (AAQS) for criteria air pollutants, hazardous air pollutant standards, state attainment plans, motor vehicle emissions standards, stationary source emissions standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions. The United States Environmental Protection Agency (EPA) is responsible for administering the FCAA. EPA sets nationwide emission standards for mobile sources, which include on-road (highway) motor vehicles such as trucks, buses, and automobiles, and off-road vehicles and equipment used in construction, agricultural, industrial, and mining activities (such as bulldozers and loaders). The EPA also sets nationwide fuel standards. The FCAA allows states to set their own motor vehicle emission and fuel standards, as long as they are the same or more stringent than federal standards.

#### ***State***

##### *California Clean Air Act*

The California Clean Air Act (CCAA), first signed into law in 1988, provides a comprehensive framework for air quality planning and regulation, and defines, through statute, the state's air quality goals, planning and regulatory strategies, and performance. The CCAA requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (AAQS). The California AAQS are generally more restrictive than the National AAQS. The California Air Resources Board (CARB) is the agency responsible for administering the CCAA. State-level air quality permitting and enforcement activities are implemented through

regional agencies. The Bay Area Air Quality Management District (BAAQMD) is the air quality agency in the San Francisco Bay Area for assuring that the National and California AAQS are attained and maintained in the San Francisco Bay Area Air Basin (SFBAAB).

### ***Regional***

#### *2017 Clean Air Plan*

The BAAQMD adopted the 2017 Clean Air Plan (CAP) on April 19, 2017 to comply with state air quality planning requirements set forth in the California Health & Safety Code. The primary goals of the 2017 CAP are to attain State and Federal AAQS, eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants, and reduce Bay Area greenhouse gas (GHG) emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

To meet these goals, the Plan defines an integrated, multipollutant control strategy to reduce emissions of particulate matter, toxic air contaminants (TACs), ozone precursors, including reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>), and greenhouse gases. The control strategy encompasses 85 individual control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter (PM), ozone (O<sub>3</sub>), and toxic air contaminants; to reduce emissions of methane and other “super-greenhouse gases” that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion from the full range of emission sources. The control measures are categorized by sector including Stationary (Industrial) Sources, Transportation, Energy, Buildings, Agriculture, Natural and Working Lands, Waste Management, Water, and Super-GHG Pollutants. Control measures can include measures such as reduction in motor vehicle travel by promoting transit, bicycling, walking and ridesharing, and expansion in production of low-carbon, renewable energy by promoting on-site technologies, such as rooftop solar, wind and ground-source heat pumps.

In general, a project is considered consistent with the Plan if: (1) the project supports the primary goals of the CAP, (2) includes control measures and (3) does not interfere with implementation of the CAP measures. The BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP.

#### *BAAQMD 2017 CEQA Air Quality Guidelines*

The purpose of the CEQA Air Quality Guidelines is to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the SFBAAB. The Guidelines contain

instructions on how to evaluate, measure, and mitigate air quality impacts generated from land development construction and operation activities. The Guidelines focus on criteria air pollutants, GHGs, TACs, and odor emissions generated from plans or projects and are intended to help lead agencies navigate through the CEQA process. The Guidelines for implementation of the Thresholds are for information purposes only to assist local agencies. Recommendations in the Guidelines are advisory and should be followed by local governments at their own discretion.

The most recent version of the CEQA Air Quality Guidelines were published May 2017, and includes revisions made to address the Supreme Court's opinion (*California Building Industry Association v. Bay Area Air Quality Management District*, December 2015).<sup>1</sup> The May 2017 Guidelines include the existing significance thresholds and provide quantitative screening criteria for various types of development projects allowing for streamlined review of projects that would be considered to have a less than significant impact to air quality due to their size.

The BAAQMD is currently updating the current CEQA Guidelines and Thresholds of Significance. However, as the updates are not adopted at this time, The CEQA Guidelines, May 2017 continue to be relied upon to assess air quality impacts of development projects.

#### *Community Air Risk Evaluation Program*

The BAAQMD's Community Air Risk Evaluation (CARE) program, initiated in 2004 to evaluate and reduce health risks associated with exposure to outdoor TACs in the Bay Area, is an on-going program that encourages community involvement and input. The technical analysis portion of the CARE program is being implemented in three phases that includes an assessment of the sources of TAC emissions, modeling and measurement programs to estimate concentrations of TAC, and an assessment of exposures and health risks. Based on findings of the latest report, Diesel Particulate Matter (DPM) was found to account for approximately 85 percent of the cancer risk from airborne toxics. Collectively, five compounds (DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde) were found to

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<sup>1</sup> In March 2012, the Alameda County Superior Court ordered BAAQMD to set aside use of the significance thresholds within the BAAQMD 2010 CEQA Guidelines and cease dissemination until they complete an assessment of the environmental effects of the thresholds in accordance with CEQA. The Court found that the thresholds, themselves, constitute a "project" for which environmental review is required. In August 2013, the First District Court of Appeal reversed the Alameda County Superior Court's decision. The Court held that adoption of the thresholds was not a "project" subject to CEQA because environmental changes that might result from their adoption were too speculative to be considered "reasonably foreseeable" under CEQA. In December 2015, the California Supreme Court reversed the Court of Appeal's decision and remanded the matter back to the appellate court to reconsider the case in light of the Supreme Court's opinion.

be responsible for more than 90 percent of the cancer risk attributed to emissions. All of these compounds are associated with emissions from internal combustion engines. The most important sources of cancer risk-weighted emissions were combustion-related sources of DPM, including on-road mobile sources (31 percent), construction equipment (29 percent), and ships and harbor craft (13 percent).

Throughout the program, information derived from the technical analyses will be used to focus emission reduction measures in areas with high TAC exposures and a high density of sensitive populations (sensitive receptors). Risk reduction activities associated with the CARE program are focused on the most at-risk communities in the Bay Area. Overburdened communities are areas located (i) within a census tract identified by the California Communities Environmental Health Screening Tool (CalEnviroScreen), Version 4.0 implemented by the California Office of Environmental Health Hazard Assessment (OEHHA), as having an overall CalEnviroScreen score at or above the 70th percentile, or (ii) within 1,000 feet of any such census tract. The BAAQMD has identified six at-risk communities comprised of Concord, Richmond/San Pablo, Western Alameda County, San José, Redwood City/East Palo Alto, and Eastern San Francisco. The project site is not within the CARE area and not within a BAAQMD overburdened area as identified by CalEnviroScreen.

### ***Local***

#### *City of Pacifica General Plan 1980*

The City of Pacifica General Plan includes goals, policies, and actions to reduce air pollutants and exposure to toxic air contaminants within the Conservation Element. Goals, policies, and actions applicable to the proposed project and this assessment include the following:

- Conservation Element
  - ♦ Protect significant trees of neighborhood or area importance and encourage planting of appropriate trees and vegetation.
  - ♦ Develop policies and ordinances directed to energy conservation.
  - ♦ Amend the Uniform Building Code to include appropriate energy-saving building requirements.
  - ♦ Develop a tree planting plan and a practical tree ordinance which preserves the forested character of the neighborhoods now planted, identifies moderate height species, and encourages forestation. Provide City assistance where possible.
  - ♦ Evaluate the overall energy-saving effectiveness of the existing City programs, particularly those identified in the Conservation Element. Decrease energy consumption where possible.



*City of Pacifica Climate Action Plan, 2014*

The BAAQMD encourages local governments to adopt qualified GHG reduction strategies that are consistent with the goals of Assembly Bill (AB) 32. The City of Pacifica Climate Action Plan (PCAP), adopted in 2014, identifies 15 GHG reduction strategies for implementation to address four emission sources, including energy, transportation and land use, solid waste, and water. The PCAP is discussed in greater detail in Section 4.8 Greenhouse Gas Emissions.

**4.2.2 ENVIRONMENTAL SETTING**

The Project site is located in the city of Pacifica, San Mateo County, which is located in the San Francisco Bay Area Air Basin. The Air Basin encompasses approximately 5,600 square miles and includes all of Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, and Napa Counties, and portions of southwestern Solano and southern Sonoma counties. The Air Basin is characterized by a large, shallow basin surrounded by coastal mountain ranges tapering into sheltered inland valleys. The combined climatic and topographic factors result in increased potential for the accumulation of air pollutants in the inland valleys and reduced potential for buildup of air pollutants along the coast. The Air Basin is bounded by the Pacific Ocean to the west and includes complex terrain consisting of coastal mountain ranges, inland valleys and bays.

***Criteria Air Pollutants***

Criteria Air Pollutants are pollutants for which nationwide ambient air quality standards have been established. AAQS i.e. the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare, have been established at both the State and Federal level for seven air pollutants. These pollutants are ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), and lead (Pb). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Carbon monoxide, reactive organic gases, nitrogen oxides, sulfur dioxide, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead are primary air pollutants and are referred to as “criteria air pollutants.” ROG and NOX are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone and nitrogen dioxide are the principal secondary pollutants.

As noted in the 2017 CAP, the San Francisco Bay Area meets all ambient air quality standards with the exception of ground-level ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, as detailed in Table 4.2-1. Due to exceedance of these national and state standards, the Bay Area Air Basin is designated as

non-attainment, meaning that the area does not meet the applicable air quality standards for these specific pollutants.

**TABLE 4.2-1: NON-ATTAINMENT AIR QUALITY POLLUTANTS**

<b>Pollutant</b>	<b>State Standard</b>	<b>National Standard</b>	<b>Non-Attainment</b>
<b>1-hour Ozone</b>	0.09 ppm	-	State
<b>8-Hour Ozone</b>	0.07 ppm	0.070 ppm (3-year avg. of 4th highest value)	State, National
<b>24-Hour PM<sub>2.5</sub></b>	-	35 µg/m <sup>3</sup> (3-year average of 98th percentile)	National
<b>Annual PM<sub>2.5</sub></b>	12 µg/m <sup>3</sup> (3-year max)	12 µg/m <sup>3</sup> (3-year max)	State
<b>24-Hour PM<sub>10</sub></b>	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	State
<b>Annual PM<sub>10</sub></b>	20 µg/m <sup>3</sup>	-	State

*Source: Bay Area Air Quality Management District, Final 2017 Clean Air Plan, Table 2-2 Standards for Criteria Pollutants, Attainment Status and Design Values*

The highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM<sub>10</sub>) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM<sub>2.5</sub>). Elevated concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> are the result of both region-wide (or cumulative) emissions and localized emissions. Like high ozone levels, high particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

### **Toxic Air Contaminants**

A broad class of compounds known as toxic air contaminants are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). TACs are known to cause morbidity or mortality, usually because they cause cancer, and include, but are not limited to, criteria air pollutants. Diesel exhaust is the predominant TAC present in urban environments. As indicated above, Diesel Particulate Matter was found to account for

approximately 85 percent of the cancer risk from airborne toxics according to the findings of the latest report of the CARE program. Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and Federal level.

### ***Sensitive Receptors***

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. CARB defines sensitive receptors as children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution<sup>2</sup>. Locations where these sensitive receptors congregate are considered sensitive receptor locations and may include hospitals, schools, and day care centers, and other locations as determined by the air district board or CARB. Residential areas are also considered sensitive receptors to air pollution because residents, including children and the elderly, tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. For cancer risk assessments, children are the most sensitive receptors, since they are more susceptible to cancer causing TACs.

Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, engaging in physical activity places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution as exposure periods are relatively short and intermittent since the majority of workers are indoors while working at these types of locations.

The closest sensitive receptor locations to the project site include single-family residences to the north and west. In addition, recreational land uses, which as noted above are considered moderately sensitive to air pollution, are located at the existing recreational field at the southern portion of the project site. This recreation field and Frontierland Park, east of the site will be retained as part of the proposed project. In addition, the project would introduce new sensitive receptors (i.e., residents) to the area.

### **4.2.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, the proposed project would result in a

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<sup>2</sup> California Air Resources Board, Sensitive Receptor Assessment, <https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment>, accessed December 2021.

significant impact related to air quality if it would:

1. Conflict with or obstruct implementation of an applicable air quality plan
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard
3. Expose sensitive receptors to substantial pollutant concentrations
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

#### **4.2.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

Impacts to air quality resulting from the proposed project are discussed below. The analysis contained herein is, in part, based on the Construction Community Risk Assessment (Appendix 4.2-A) prepared for the project. Impacts are assessed using the significance criteria listed in 4.2.3, above and identify potential direct and indirect air quality impacts from construction and ongoing operation of the project.

***Impact AQ-1: Implementation of the proposed Pacifica School District Workforce Housing project would not conflict with or obstruct implementation of an applicable air quality plan (less than significant impact).***

Air quality plans applicable to the City of Pacifica include the 2017 CAP and the 2014 PCAP, as previously described in 4.2.1.

The proposed project would be considered consistent with the 2017 CAP if it (1) supports the primary goals of the CAP, (2) includes control measures and (3) does not interfere with implementation of the CAP measures. The proposed project is consistent with the 2017 CAP as it (1) proposes infill development on a previously developed site within existing urban limits and consequently limits urban sprawl, (2) would implement best management practices (BMPs) set forth by BAAQMD to protect air quality during construction, and (3) falls below the screening criteria levels and thus would not be considered to result in significant air quality impacts. Therefore, the project will not conflict with the regional air quality plan and impacts would be less than significant.

The project also does not conflict with the greenhouse gas reduction strategies outlined in the PCAP, as discussed in greater detail in Section 4.8 Greenhouse Gas Emissions. Therefore, impacts resulting from a conflict with the City's adopted PCAP would be less than significant.

***Impact AQ-2: Implementation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (potentially significant impact).***

Air quality emissions associated with the Pacifica School District Workforce Housing project would result from short-term construction activities and ongoing operation of the residential units and existing recreational field. Current BAAQMD Guidelines include screening criteria which provide a conservative guide to determine whether a project may result in significant air quality impacts. A project would be considered to have a potentially significant impact to air quality if it were of a size greater than that indicated by the screening criteria, thus warranting further qualitative analysis. In contrast, projects of a size less than the screening criteria would be expected to result in less than significant impacts to air quality since pollutant emissions would be minimal. When projects fall below the screening criteria levels, a quantitative analysis of the project's air quality emissions is not required. Table 4.2-2 Provides operational and construction screening sizes for the land use type Apartment, low-rise, which is considered to be analogous with the residential portion of the project and City park, which is considered to be analogous with the recreational field.

**TABLE 4.2-2: AIR QUALITY SCREENING CRITERIA**

<b>Land Use Type</b>	<b>Operational</b>	<b>Construction</b>
Apartment, low-rise	451 dwelling units	240 dwelling units
City park	2,613 acres	67 acres

*Source: Bay Area Air Quality Management District CEQA Guidelines, 2017, Table 3-1 Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes.*

As described in 4.2.2, the San Francisco Bay Area Air Basin is designated non-attainment for state and national ozone, state and national PM<sub>2.5</sub>, and state PM<sub>10</sub>. The BAAQMD CEQA Guidelines include thresholds of significance for air pollutants, including pollutants for which the Bay Area Air Basin is designated non-attainment. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable and the project's impact on air quality would be considered significant.

The proposed project would construct 70 residential units in seven two-story buildings, residential amenity, and accessory buildings, and would retain the existing recreational field at the southern portion of the lot. As shown in the table above, the proposed project is well below the construction and operational screening criteria for low-rise apartments and city parks, which are the land uses considered to be analogous with the proposed project. Given

that the project falls below the screening criteria, quantitative air quality analysis is not needed. Therefore, a qualitative analysis to determine the project's potential to result in a significant air quality impact is included below.

### *Construction*

Construction activities are short-term and will include temporary disturbance resulting from demolition of existing structures, removal of vegetation and grasses, grading, construction of proposed residential units and other structures, and installation of associated site improvements such as landscaping, stormwater treatment facilities, and frontage improvements. During construction activities, the project will generate temporary air pollutant emissions associated with demolition, site preparation, ground disturbance, operation of heavy-duty construction equipment, workers traveling to and from the site, and delivery of materials. These activities would create temporary emissions of fugitive dust from site grading, and the release of toxic air contaminants, particulate matter, and ozone precursors (ROG and NOx) from combustion of fuels and operation of heavy-duty construction equipment.

As noted previously, the project size is well below the screening criteria for construction. Therefore, it can be reasonably assumed that pollutant emissions generated during construction would fall below the established thresholds of significance identified in the 2017 BAAQMD CEQA Guidelines. Furthermore, the Guidelines establish that incorporation of BAAQMD BMPs, which provide for a variety of dust control measures during construction activities including watering the project site, covering haul loads, limiting idling times, and temporarily halting construction when winds are greater than 15 miles per hour, will reduce fugitive dust emissions, for which the region is designated non-attainment, to less than significant levels. As such, the project shall implement **Mitigation Measure AQ-1**, which incorporates BAAQMD construction BMPs. With incorporation of measure AQ-1, the project will not result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment and impacts would be less than significant.

### *Operational*

The proposed project will result in stationary and mobile source emissions during operation. Although no new stationary point sources, such as a manufacturing plant, will be introduced, the project will result in area source emissions from the use of consumer products typically associated with operation of residential uses, such as solvents, cleaners, paints, and operation of landscaping maintenance equipment. Many of the operational emissions will

result from vehicles traveling to and from the project site by residents, delivery trucks, visitors, and recreational users.

As noted previously, the CEQA Guidelines incorporate operational-related screening criteria as a conservative indication of whether a project could result in potentially significant air quality impacts. If the project is below the screening criteria, it can be reasonably assumed that air quality impacts of the project at operation would be less than significant. Table 4.2-2 includes the operational-related screening level size for low rise apartments, which is 451 dwelling units. The project proposes 70 dwelling units in seven two-story residential buildings comprised of flats/apartments and townhouses. Therefore, no additional air quality assessment for operational-related impacts is required, and it can be concluded that the project's operational related air quality impacts would be less than significant.

***Impact AQ-3: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations (potentially significant impact).***

Project impacts related to increased community risk can occur by introducing a new sensitive receptor, such as a residential use, to an area that is incompatible for such uses, or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity. The project would introduce new sensitive receptors (residences) to the project site with the construction of the proposed residential buildings. Existing sensitive receptors in the vicinity include single-family residences across Oddstad Boulevard to the west, south, and north of the project site as well as users of the recreational field at the southern portion of the site. The BAAQMD recommends using a 1,000-foot screening radius around a project site for purposes of identifying community health risk from siting a new sensitive receptor or a new source of TACs. Introduction of new sensitive receptors as a result of the project is not considered an impact pursuant to CEQA,<sup>3</sup> but rather is considered to ensure land use compatibility.

*Community Health Risk Assessment*

Although the project is below the construction screening criteria of 240 dwelling units as identified in Table 4.2-2, a qualitative analysis was prepared by Air Quality Specialist, Illingworth & Rodkin to determine potential impacts to existing nearby sensitive receptors associated with construction of the project. The analysis utilized the California Emissions

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<sup>3</sup> Pursuant to the judicial decisions in *CBIA v. BAAQMD* (2015) 62 Cal.4th 369, 386 and *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473, the impacts of the environment on a project are excluded from CEQA unless the project itself "exacerbates" such impacts.

Estimator Model (CalEEMod), as recommended by BAAQMD, to compute annual emissions for construction based on the project type, size, and acreage. CalEEMod Version 2020.4.0 was used to estimate emissions resulting from on-site construction activities, construction vehicle trips, and evaporative emissions. On-site activities resulting in air quality emissions during construction primarily consist of construction equipment operation while off-site activities resulting in air quality emissions primarily comprise worker, hauling, and vendor traffic to and from the site. A construction build-out scenario, including equipment list and schedule, was used to estimate emissions during construction and was based on information provided by the project applicant. Construction inputs include the following:

- Demolition
  - ♦ 34,000 s.f. school building
  - ♦ 3,600 s.f. modular building
  - ♦ 66,000 s.f. of asphalt concrete (AC) paving
  - ♦ 23,000 s.f. of concrete paving
- Grading
  - ♦ 5,230 cubic yards export
  - ♦ 7,090 cubic yards import
  - ♦ 1,860 cubic yards of net import

Construction activities are anticipated to occur over a 19-month period from December 2022 to July 2024, with initial occupancy of residential units in August 2024. As discussed in Chapter 3.0 of this DEIR, the project is expected to be constructed in a single phase, but may occur over two phases depending on economic conditions in place at the time.

Using the information described above, the Community Health Risk Assessment evaluated potential health effects of sensitive receptors at the existing nearby residences from construction emissions of DPM and PM<sub>2.5</sub>. The assessment, detailed in Appendix 4.2-A, identifies the maximum modeled annual DPM and PM<sub>2.5</sub> concentrations, at nearby sensitive receptors to find the maximally exposed individuals (MEI). Results of the assessment indicate that the construction MEI is located on the first floor (5 feet above ground) of an adjacent single-family home to the north/northeast of the project site. Table 4.2-3 below presents the anticipated impacts resulting from construction activity at the project MEI.

**TABLE 4.2-3. IMPACTS FROM COMBINED SOURCES AT PROJECT MEI**

Source	Cancer Risk (per million)	Annual PM <sub>2.5</sub> (µg/m <sup>3</sup> )	Hazard Index
Project Construction			
Unmitigated	24.50 (infant)	0.34	0.02
Mitigated*	2.48 (infant)	0.12	<0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
Exceed Threshold?	Yes	Yes	No



Source	Cancer Risk (per million)	Annual PM <sub>2.5</sub> (µg/m <sup>3</sup> )	Hazard Index
Unmitigated Mitigated*	No	No	No
BAAQMD Cumulative Source Threshold	100	0.8	10.0
Exceed Threshold? Unmitigated Mitigated*	No No	No No	No No

Source: *Pacifica School District Workforce Housing Construction Community Risk Assessment, prepared by Illingworth & Rodkin, November 17, 2021, Page 13, Table 4.*

\* Construction equipment with Tier 4 interim engines and Best Management Practices as mitigation

### Single-Source Emissions

Construction activity would generate dust and equipment exhaust on a temporary basis that could affect nearby sensitive receptors. Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM<sub>10</sub> and PM<sub>2.5</sub>. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soil. Unless properly controlled, vehicles leaving the site could deposit mud on local streets, which could be an additional source of airborne dust after it dries. Additionally, construction equipment and associated heavy-duty truck traffic would generate diesel exhaust, which is a known TAC. Construction exhaust emissions pose risks to sensitive receptors which includes existing nearby residences surrounding the project site and individuals using the recreational field at the southern portion of the project site. The primary community risk impact associated with construction emissions are cancer risk and exposure to PM<sub>2.5</sub>. While not a TAC, fine particulate matter (PM<sub>2.5</sub>) has been identified by the BAAQMD as a pollutant with potential non-cancer health effects that should be included when evaluating potential community health impacts under CEQA. Potential non-cancer health hazards from TAC exposure are expressed in terms of a hazard index (HI), which is the ratio of the TAC concentration to a reference exposure level (REL).

As shown in Table 4.2-3, the maximum unmitigated cancer risk and annual PM<sub>2.5</sub> concentrations caused by construction of the project exceed their respective BAAQMD single-source thresholds which could impact nearby residential uses. Recreational users at the southern portion of the site would be less impacted as activity associated with use of recreational facilities occurs over a shorter duration, resulting in less exposure as compared to residential uses. Implementation of **Mitigation Measures AQ-1** will be required and requires implementation of BMPs that control for fugitive dust during construction. To reduce impacts to sensitive receptors from diesel exhaust emissions, the project will also be

required to implement **Mitigation Measures AQ-2**, which requires reduction of diesel particulate matter emissions by 60 percent. With implementation of measures AQ-1 and AQ-2, the BAAQMD single-source threshold will not be exceeded and impacts resulting from exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

### **Cumulative Emissions**

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors located within 1,000 feet of a project site, which is referred to as the influence area. These sources include freeways or highways, busy surface streets, and stationary sources identified by BAAQMD. Traffic on high volume roadways is a source of TAC emissions that may adversely affect sensitive receptors near the roadway. For local roadways, BAAQMD considers traffic volumes of over 10,000 vehicles per day to have a potentially significant impact on sensitive receptors.

A review of the project area and the traffic analysis provided for the project indicate that no roadways within the influence area would have traffic exceeding 10,000 vehicles per day, including with the addition of project-generated traffic. A review of BAAQMD's Permitted Stationary Sources 2018 geographic information systems (GIS) mapping tool identified no stationary sources within 1,000 feet of the project site and MEI. Therefore, exposure to toxic air contaminants for all sources combined, including project construction, would be below the BAAQMD cumulative source threshold and impacts resulting from exposure of existing sensitive receptors to substantial pollutant concentrations during project construction would be less than significant.

***Impact AQ-4: Implementation of the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (less than significant impact).***

There may occasionally be localized odors during site development associated with construction equipment, paving and the application of architectural coatings. Any odors generated during construction would be temporary and not likely noticeable beyond the immediate construction zone. As a residential development, operation of the project will not create objectionable odors affecting a substantial number of people. Therefore, the project will have less than significant impacts to air quality due to objectionable odors.

***Mitigation Measures***

**AQ-1:** Latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all demolition and construction plans to require implementation of the following:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

**AQ-2:** Prior to issuance of a demolition and/or grading permit, a plan to reduce diesel particulate matter emissions by at least 60 percent shall be prepared and submitted to the City for review and acceptance. The plan shall include, but not be limited to, the following strategies:

1. All construction equipment larger than 50 horsepower used at the site for more than

two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), if feasible. Alternatively, the plan may include:

- a. Equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 60 percent or greater reduction in particulate matter exhaust in comparison to uncontrolled equipment.
  - b. Alternatively fueled or electric equipment.
2. Alternatively, the applicant may develop a construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 60 percent or greater. The construction operations plan shall be subject to review by an air quality expert and approved by the City prior to construction. Elements of the plan could include a combination of the following measures:
- a. Use Tier 4 or alternatively fueled equipment;
  - b. Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors;
  - c. Use of electric-powered equipment;
  - d. Use of electric or propane/natural gas-powered forklifts and aerial lifts;
  - e. Change in construction build-out plans to lengthen phases;
  - f. Implementation of different building techniques that result in less diesel equipment usage.

#### **4.2.5 APPENDICES**

- Appendix 4.2-A: Pacifica School District Workforce Housing Construction Community Risk Assessment, prepared by Illingworth & Rodkin, November 17, 2021.

#### **4.2.6 REFERENCES**

1. California Air Resources Board, Sensitive Receptor Assessment <https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment>, accessed December 2021.
2. California Environmental Quality Act Air Quality Guidelines, Bay Area Air Quality Management District, May 2017.

## 4.3 BIOLOGICAL RESOURCES

This section summarizes the regulatory framework for evaluating biological resources, summarizes the biological resources within the project site, and discusses the potential impacts resulting from implementation of the proposed project. The following documents were used to analyze the potential impacts that could occur:

- Arborist Report, prepared Traverso Tree Service, March 18, 2020
- Arborist Letter regarding Replacement Trees, Traverso Tree Service, June 17, 2020
- Biological Resources Assessment, prepared by Coast Ridge Ecology, November 2021
- Wetland Delineation, prepared by Coast Ridge Ecology, November 2021
- Rare Plant Survey, prepared by Coast Ridge Ecology, May 31, 2022

### 4.3.1 REGULATORY CONTEXT

#### ***Federal***

##### *Clean Water Act*

The Clean Water Act (CWA) is codified in Title 33 of the Code of Federal Regulations (CFR) and establishes regulations for the discharge of pollutants into Waters of the United States, which include the territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including waters which are subject to the ebb and flow of the tide; tributaries; lakes and ponds, impoundments of jurisdictional waters; and adjacent wetlands.<sup>1</sup> Waters of the United States exhibit a defined bed, bank, and ordinary high water mark (OHWM), which is defined as that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank.<sup>2</sup> In addition to regulating discharge of pollutants into Waters of the United States, the CWA establishes water quality standards for surface waters. The Environmental Protection Agency (EPA) has established pollution control programs including wastewater standards and recommendations for pollutants in surface waters.

Discharge of fill material into Waters of the United States, including wetlands, is regulated by the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (33 U.S.C. 1251–1376). Discharges of fill material are defined in Section 323.3(f) of the Federal Code of

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<sup>1</sup> Code of Federal Regulations, Title 33 – Navigation and Navigable Waters, Chapter II, - Corps of Engineers, Department of the Army, Department of Defense, Part 328 – Definition of Waters of the United States, Section 328.3

<sup>2</sup> Ibid.

Regulations and include but are not limited to placement of fill necessary for construction of any structure or infrastructure in a water of the United States, building of any structure, infrastructure, or impoundment requiring rock, sand, dirt, or other material for its construction, and site-development fills for recreational, industrial, commercial, residential, or other uses. As specified therein, discharges of fill do not include plowing, cultivating, seeding, and harvesting for the production of food, fiber, and forest products.

#### *Federal Endangered Species Act*

The Federal Endangered Species Act (ESA) was passed by the United States Congress in 1973 to protect and recover endangered plants and animals, and the ecosystems on which they depend for survival. The ESA is administered by the United States Fish and Wildlife Service (USFWS), having responsibility for terrestrial and freshwater species, and the National Marine Fisheries Service (NMFS), informally known as NOAA Fisheries, having responsibility for marine wildlife. Species are afforded protection under the ESA if they are “listed” as either “endangered” or “threatened” where endangered species are defined as those that are in danger of extinction throughout all or a significant portion of their known range, and threatened species are those that are likely to become extinct in the foreseeable future. The ESA allows individuals and organizations to petition to have species listed as endangered or threatened, which undergo scientific evaluation and public review before a final decision is made on whether a species should be formally listed as protected.

Once a species is formally listed, it is fully protected from a “take”, which is defined as the harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting of wildlife species or any attempt to engage in such conduct, including modification of its habitat (16 U.S.C. 1532, 50 C.F.R. 17.3). When an activity would result in a “take” of a formally listed species, a take permit issued by the applicable regulating agency is required.

#### *Federal Migratory Bird Treaty Act*

The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703–711) makes it illegal to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 C.F.R. Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 C.F.R. 21).

#### *Federal Bald and Golden Eagle Protection Act*

The Bald and Golden Eagle Protection Act (16 U.S.C. Section 668) protects these birds from direct take and prohibits the take or commerce of any part of these species. The USFWS

administers the act, and reviews federal agency actions that may affect these species.

### **State**

#### *Regional Water Quality Control Board*

Section 401 of the CWA (33 U.S.C. 1341) requires an applicant who is seeking a 404 permit to first obtain a water quality certification from the Regional Water Quality Control Board (RWQCB). To issue a water quality certification, the RWQCB must conclude that the proposed fill is consistent with the water quality standards established by the State for the waterbody. The San Francisco RWQCB (Region 2) is responsible for enforcing water quality criteria and protecting water resources in the City of Pacifica.

#### *California Endangered Species Act*

The California Endangered Species Act (CESA) is administered by the California Department of Fish and Wildlife (CDFW) and is intended to protect plant and animal species when they are of special ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the State. CESA established that it is State policy to conserve, protect, restore, and enhance endangered species and their habitats. The CDFW is responsible for conducting scientific reviews of species petitioned for listing under CESA, administering regulatory permitting programs to authorize take of listed species, maintaining a database of listed species occurrences, and conducting periodic review of listed species to determine if the conditions that led to original listing are still present.

CESA expanded upon the original Native Plant Protection Act (NPPA) and enhanced legal protection for plants. To be consistent with federal regulations, CESA created the categories of "endangered" and "threatened" species. All animal species listed as "rare" were given a status of "threatened" under the Act however, this was not similarly done for plant species. Thus, there are three listing categories for plants in California including rare, threatened, and endangered. Under State law, plant and animal species may be formally designated by official listing by the California Fish and Game Commission.

#### *California Environmental Quality Act*

The California Environmental Quality Act (CEQA) provides that a species that is not listed on the federal or state endangered species list may be considered rare or endangered if the species meets certain criteria. Under CEQA, public agencies must determine if a project would adversely affect a species that is not protected by FESA or CESA. Species that are not listed under FESA or CESA, but are otherwise eligible for listing, such as candidate or

proposed species, may be the subject of cooperative conservation efforts between federal agencies, state and tribal governments, local government, industry, and the public until the opportunity to list the species arises for the responsible agency. The CDFW has designated certain animal species that may be considered for review, referred to as Species of Special Concern (SSC), which are listed due to concerns about declining population levels, limited ranges, and continuing threats that have made these species vulnerable to extinction. The SSC designation is considered an administrative designation by CDFW; however, SSC are provided protection under CEQA Guidelines Section 15380 which includes species that are not currently threatened or extinct, but occur in such small numbers that they may become endangered if their environment changes. Other species identified as experiencing population declines which may result in their extinction are also afforded protection pursuant to CEQA Guidelines Section 15380. Additionally, the California Native Plant Society (CNPS) has developed a rating system for the state's rare, threatened, and endangered plants that are native to California and have low numbers, limited distribution, or are otherwise threatened with extinction. Plants rated by CNPS are subject to protection under CEQA.

#### *California Fish and Game Code*

The California Fish and Game Code establishes the basis of fish, wildlife, and native plant protection and management in the state. Section 1802 of the code establishes CDFW as having jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species.

#### **California Native Plant Protection Act**

The California Native Plant Protection Act is intended to preserve, protect, and enhance endangered or rare native plants in California. This Act directs the CDFW to establish criteria for determining what native plants are rare or endangered. Under this Act, a species is endangered when its prospects for survival and reproduction are in immediate jeopardy from one or more causes. A species is rare, although not threatened with immediate extinction, if it is in such limited numbers throughout its range that it may become endangered if its present environment worsens. This Act prohibits any person from importing, taking, possessing, or selling any endangered or rare native plants within California, except as incidental to the possession or sale of the real property on which the plant is growing, or as otherwise excepted under the Act.

As stated above, the CNPS maintains a list of plant species native to California that have low numbers, limited distribution, or are otherwise threatened with extinction. This information



is published in the Inventory of Rare and Endangered Vascular Plants of California. Potential impacts to populations of rare plants receive consideration under CEQA review. The CNPS ranking system includes:

- **List 1A:** Plants presumed extinct
- **List 1B:** Plants rare, threatened or endangered in California and elsewhere
- **List 2:** Plants rare, threatened or endangered in California, more numerous elsewhere

### **Predatory Birds**

Under the California Fish and Game Code, all predatory birds in the order Falconiformes or Strigiformes in California, generally called “raptors,” are protected. The law indicates that it is unlawful to take, possess, or destroy the nest or eggs of any such bird unless it is in accordance with the code. Any activity that would cause a nest to be abandoned or cause a reduction or loss in a reproductive effort is considered a take, and generally includes construction activities.

### ***Local***

#### *City of Pacifica General Plan 1980*

The City of Pacifica General Plan includes goals and policies intended to protect biological resources within the City. Policies applicable to the proposed project include the following:

- Conservation Element Policies
  - ♦ Conserve trees and encourage native forestation
  - ♦ Require the protection and conservation of indigenous rare and endangered species
  - ♦ Protect significant trees of neighborhood or area importance and encourage planting of appropriate trees and vegetation
  - ♦ Promote the conservation of all water, soil, wildlife, vegetation, energy, minerals, and other natural resources
- Open Space Element Policies
  - ♦ Retain open space which preserves natural resources, protects visual amenities, prevents inappropriate development, provides for the managed use of resources, and protects the public health and safety

#### *Pacifica Municipal Code*

Chapter 12 (Preservation of Heritage Trees) of Title 4 (Public Safety) of the Pacifica Municipal Code (PMC) sets forth regulations for heritage trees on public and private property. At the time of initial application of the project and at the time the project was deemed complete,, heritage trees were defined as (1) trees within the City of Pacifica, exclusive of eucalyptus,

which have a trunk with a circumference of fifty (50") inches (approximately sixteen (16") inches in diameter) or more, measured at twenty-four (24") inches above the natural grade; or (2) a tree or grove of trees, including eucalyptus, designated by resolution of the Council to be of special historical, environmental, or aesthetic value. On September 12, 2022, prior to the publication of this DEIR, the City Council adopted Ordinance 884-C.S., repealing and replacing Pacifica Municipal Code Chapter 12 - Tree Preservation and Chapter 14 - Maintenance and Preservation of City Trees. As specified in the Ordinance, the definition of heritage trees was altered to include any trees of the species *Quercus agrifolia* (coast live oak), *Quercus lobata* (valley oak), *Aesculus californica* (California buckeye), *Pinus radiata* (Monterey pine), or *Sequoia sempervirens* (redwood), that have a trunk diameter of 12 inches or more. Additionally, any tree of the species *Heteromeles arbutifolia* (toyon) with a 4 inch or greater diameter at breast height (DBH) is considered a heritage tree under the updated Ordinance. In addition to heritage trees, the Ordinance specifies that protected trees include all trees on public or private property with a trunk diameter of 12 inches or greater at DBH, any heritage tree designated by the director, or any grove of trees. Prior to removal of a heritage or protected tree on public or private property, a tree removal permit must be granted by the City of Pacifica, the granting of which is determined based on the criteria contained in Section 4-12.05(c) of the PMC. In the event that removal of a heritage tree occurs in conjunction with a discretionary permit or other land use approval, preparation of a tree protection plan by a qualified arborist, horticulturalist, or landscape architect is required and must include the following information.

- Size, species, aesthetics, state of health, and dripline location of each tree is within 20 feet of proposed development areas, including where trenching or paving is proposed.
- Mitigating measures proposed to ensure survival of remaining trees throughout and after construction is complete.
- Size, species, and location of trees proposed to replace those proposed for removal.

#### 4.3.2 ENVIRONMENTAL SETTING

The following environmental setting includes information contained in the Biological Resources Assessment (BRA) prepared by Coast Ridge Ecology, dated November 2021. The BRA included a survey of the project site and surrounding area for biological resources on September 8, October 5, and October 11, 2021. Additionally, the BRA relies on information obtained from the California Department of Fish and Wildlife Natural Diversity Database (CNDDB), California Native Plant Society On-line Inventory of Rare, Threatened, or Endangered Plants of California, research and publications, technical knowledge of regional biological setting, and observations made during the onsite field surveys.

### **Vegetation Communities**

The BRA identified 11 vegetation communities within the project site, noting that the majority of native vegetation communities are located along the undeveloped eastern portion of the site, and non-native vegetation communities including ornamental landscaping, and invasive plant species are located in the areas proposed for redevelopment. In total, the project would impact approximately 5.6-acres of developed, planted, or non-native habitats, and 0.13-acres of natural habitat. Vegetation communities documented onsite are discussed below (See Figure 4.3-1 for distribution of vegetation communities onsite):

- **Wild Oats and Annual Brome Grassland.** This habitat type is primarily located in the northern athletic field, which will be removed as part of the project, and is dominated by non-native grass species. Due to lack of watering and maintenance of the former lawn, the area has degraded over time. Fennel (*Foeniculum vulgare*), which is a non-native invasive species and coastal tarweed (*Madia sativa*), which is a native species are also present in this area at a lower abundance as compared to other non-native grass species.
- **Needle Grass Grassland.** This habitat type, located in the vicinity of a large rock outcrop on the eastern hillside, is an example of a native perennial grassland, dominated by native perennial bunch grasses including purple needlegrass (*Stipa pulchra*), California melic (*Melica californica*), and California fescue (*Festuca californica*). Other native forb species such as yarrow (*Achillea millefolium*) and soap plant (*Chlorogalum pomeridianum*) are also present.
- **Creeping Bentgrass Meadow.** The creeping bentgrass meadow habitat is located along the southern boundary of the recreational field in the vicinity of several seasonal wetlands and is dominated by non-native perennial grasses that prefer somewhat moist environments. Isolated stands of hydrophytic vegetation such as tall flatsedge (*Cyperus eragrostis*) can be found in wetter portions of this area.
- **Fennel Patch.** A patch of invasive plants heavily dominated by fennel (*Foeniculum vulgare*) is present along the eastern edge of the school buildings between the northern and southern athletic fields. This invasive species contributes nearly 100 percent of the vegetative cover.
- **Hazelnut Scrub.** This dense, native shrub-dominated habitat covers most of the hillside in the northeast portion of the site and includes little- to no- herbaceous groundcover. The area is dominated by beaked hazelnut (*Corylus cornuta*), along with other native species including ocean spray (*Holodiscus discolor*), osoberry (*Oemleria cerasiformis*), California blackberry (*Rubus ursinus*), poison oak (*Toxicodendron diversilobum*), elderberry (*Sambucus spp.*), coffeeberry (*Frangula californica*), and coyote brush (*Baccharis pilularis*).
- **Coyote Brush Scrub.** A few patches of more open scrub habitat dominated by coyote brush (*Baccharis pilularis*) are present within the project site, and occur primarily on the

periphery of other scrub habitats. The understory is typically dominated by non-native annual grasses such as wild oats and brome (*Bromus spp.*). Some of these areas appear to have been previously dominated by invasive French broom (*Genista monspessulana*) and/or scotch broom (*Cytisus scoparius*) until recent invasive-control efforts, as evidenced by many dead specimens, were performed. It is also possible that coyote brush was able to colonize these areas more quickly than other species once the invasive shrubs were removed.

- **Poison Oak Scrub.** A small area of scrub habitat surrounding the large eastern rock outcrop is distinctly different than other scrub areas within the project site. This thin-soiled rocky area is dominated by poison oak, but a variety of other native shrub species are also present and include California sagebrush (*Artemisia californica*), osoberry, orange bush monkeyflower (*Diplacus aurantiacus*), and oceanspray. Where not composed of bare rock, the understory is dominated by native species including soap plant, western bracken fern (*Pteridium aquilinum*), and California beeplant (*Scrophularia californica*).
- **Monterey Cypress – Monterey Pine Stand.** Monterey cypress (*Hesperocyperis macrocarpa*) and Monterey pine (*Pinus radiata*) trees are not native to the San Francisco Bay Area, but were widely planted and form semi-natural stands throughout California. This plant community is present on the southeastern hillside within the project area, where the sparse understory primarily consists of scattered shrubs such as French broom and oceanspray.
- **Acacia Grove.** A few stands of invasive blackwood acacia (*Acacia melanoxylon*) can be found within the project site on the eastern hillside. Due to the dense canopy formed by the acacia, understory vegetation is nearly nonexistent.
- **Coast Live Oak Woodland.** A small patch of coast live oak woodland is located just north of the rock outcrop on the eastern hillside. Coast live oak (*Quercus agrifolia*) is the dominant tree species in this area, while the understory is primarily dominated by herbaceous species such as California blackberry, western bracken fern, wood fern (*Dryopteris arguta*) and common pacific pea (*Lathyrus vestitus*).
- **Urban Landscaping.** Urban landscaping areas are plant communities formed by ornamental species purposefully planted and maintained by humans. Two distinct landscaped habitats are present within the project site including the southern athletic field and associated smaller grassy areas maintained as lawns, and the cypress trees planted along the western and southern perimeters of the project area.
  - ♦ **Lawns.** The southern recreational field, which will be retained as part of the project is dominated by species typical of maintained lawns, none of which are native plant species.
  - ♦ **Monterey Cypress Trees.** In addition to the Monterey cypress and pine stand noted above, the site also includes ornamental Monterey cypress trees along the southern and western property boundaries, adjacent to the public rights-of-way. Ornamental

trees are distinct from the semi-natural stands as there is no understory vegetation, likely resulting from vegetation management associated with ongoing site maintenance. As noted in the Arborist report, prepared by Traverso Tree Service on March 18, 2020 (Appendix 4.3-C), the site contains 22 Monterey cypress, five of which will be removed to accommodate the proposed development.

- ♦ **Other Trees.** In addition to the Monterey Cypress Trees noted above, the site also contains four Monterey pine, and one Peruvian pepper. As proposed, the project will remove seven trees, including the five Monterey cypress trees noted previously, one Monterey pine, and the Peruvian pepper. Of the trees proposed for removal, six are considered heritage trees, which are defined as trees with a trunk diameter of 16 inches or greater, measured at 24 inches above grade.



**FIGURE 4.3-1: PLANT COMMUNITY MAP<sup>3</sup>**

<sup>3</sup> Biological Resources Assessment, prepared by Coast Ridge Ecology, November, 2021, page 10, Figure 3: Plant Community Map

**Wildlife Habitat**

As noted in the BRA, the site contains suitable nesting and foraging habitat for a variety of bird and bat species including the densely vegetated eastern hillside and large trees present onsite. During site visits conducted in September and October 2021, several species of birds were observed foraging within the scrub and forested areas on the hillside, and it is presumed that some species also use the dense vegetation as nesting sites during the breeding season. Birds and bats may also use the large trees present on the hillside as nesting and roosting locations, respectively.

In addition to providing foraging habitat for birds, fruit producing plant species present within the hazelnut scrub provides foraging opportunities for small mammal species and larger omnivores such as grey fox and raccoons. Small mammals and rodents may also utilize dense scrub habitats as cover for protection from predators such as small carnivores that hunt these and other small prey onsite.

During site surveys, several San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) middens (nests) were observed, including one within the project footprint and several within the forested and scrub habitats on the eastern hillside. Though too dense to access during the site visits, it is presumed that additional middens are present deep within the hazelnut scrub. The San Francisco dusky-footed woodrat is listed as a California Species of Special Concern, which is defined by CDFW as a species experiencing population declines that if continued could qualify it for state threatened or endangered status. As such, species listed by CDFW as Species of Special Concern are provided protections, including protection of habitat pursuant to CEQA.

**Wildlife Movement Corridors**

Wildlife movement corridors are essential to wildlife conservation and serve to facilitate movement between local and regional populations. Movement corridors provide opportunities for increased gene flow among populations, facilitating continued survival of wildlife species. Wildlife movement includes seasonal migration, long-term genetic exchange through inter-population movement, and small travel pathways supporting daily movement within a species home range for activities such as foraging or escape from predators. Barriers to wildlife movement can include, but are not limited to, large developments, fencing, roadways, and habitat destruction.

Species utilize movement corridors in a variety of ways. For example, passage species, such as coyotes, bobcats and mountain lions utilize movement corridors as through ways

between outlying habitats for a brief duration including for seasonal migration and daily movement within their home range. Movement corridors do not necessarily need to meet habitat requirements for these species' survival. In contrast, corridor species, which are those with limited dispersal capabilities, such as plants, insects, reptiles, amphibians, small mammals, and birds rely on movement corridors as key habitat for survival.

The project site and surrounding suburban development provide opportunities for wildlife movement through undeveloped corridors between and behind adjacent properties. As noted in the BRA, it is likely that species cross through the property between these surrounding undeveloped suburban corridors and the larger open space areas to the east. Although the northern athletic field will be removed to accommodate the proposed project, the southern athletic field and undeveloped eastern portion of the site will remain. Wildlife species will continue to utilize these undeveloped areas as movement corridors. Impacts to movement corridors are further discussed in 4.3.4, below.

#### ***Jurisdictional Waters and Wetlands***

As discussed in 4.3.1, waters of the United States include the territorial seas, and waters used in interstate or foreign commerce, tributaries, lakes and ponds, impoundments of jurisdictional waters, and adjacent wetlands. Waters of the State are defined more broadly and include any surface or groundwater within the boundaries of the State as well as all waters of the United States.

For an area to fall under the jurisdiction of the USACE as a wetland, it must demonstrate three characteristics including wetland vegetation, wetland hydrology, and wetland soils. Additionally, the area must have a hydrological connection to other wetlands or areas defined as waters of the United States. Similarly, the USFWS defines a wetland as an area that (1) supports predominantly hydrophytes, (2) has a substrate that is predominantly undrained hydric soil, or (3) has a substrate that is non-soil saturated with water or covered by shallow water at some time during the growing season. Under State regulations, wetlands are defined more broadly, requiring presence of only one of the three characteristics listed above.

A Wetland Delineation was prepared by Coast Ridge Ecology in November 2021 (Appendix 4.3-B) to document the type and extent of wetlands or waters that may be subject to federal and state jurisdiction and to inform potential impacts resulting from the project. As noted in the Wetland Delineation, seasonal wetlands were identified near the southeast portion of the site, comprising approximately 0.063 acres. The seasonal wetlands are dominated by



invasive non-native grasses including creeping bentgrass (*Agrostis stolonifera*), velvet grass (*Holcus lanatus*) and reed fescue (*Festuca arundinacea*). The BRA presumes that poor drainage, leaking irrigation lines and sprinklers, the presence of a restrictive layer of rock/concrete rubble, and a small seep contributed to the creation of these seasonal wetlands. In addition to the seasonal wetlands identified onsite, 141 linear feet of Waters of the United States were also mapped within an existing concrete drainage ditch that runs along the eastern portion of the project site. The OHWM of this feature was estimated to be approximately four-inches in depth and was identified based on water staining within the drainage ditch. As noted in the Wetland Delineation, this portion of the channel drains to an existing storm drain at the southeast corner of the site. The remaining portions of the drainage ditch, approximately 847 linear feet, do not transport water and therefore were not mapped as Waters of the United States. As proposed, development of the proposed project would occur approximately 100-feet from the mapped wetlands as shown in Figure 4.3-3 below except that repair of the concrete drainage ditch will occur adjacent to the seasonal wetlands. As detailed in the impact analysis, all potential impacts to seasonal wetlands will be mitigated to levels below significance.

### ***Special-Status Species***

The CNDDDB contains records of reported occurrences of rare plants and special status animal species throughout California. The database includes information on documented occurrences of species location, as well as species that would be expected to occur in similar habitat types. Areas that have not been surveyed may support sensitive species that have not been reported, and as such may require site-specific surveys to rule out the occurrence of special-status species. In addition to the CNDDDB, the CNPS maintains the On-line Inventory of Rare, Threatened, and Endangered Plants of California which includes Information on special status-plant species that have occurred or have the potential to occur on the project site.

### ***Special-Status Animal Species***

CNDDDB records document several special-status species within five miles of the project site, as shown in Figure 4.3-4. In addition to those documented through CNDDDB, one special-status species, the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), was observed during site surveys, confirming its occurrence on the property. Though not observed onsite, one special-status animal species was assessed as having a moderate potential for occurrence onsite, the hoary bat (*Lasiurus cinereus*), and one invertebrate species, the obscure bumblebee (*Bombus caliginosus*) was assessed as having low potential

for occurrence onsite. Additionally, while California red-legged frog (*Rana draytonii*) has a low potential for occurrence onsite due to lack of suitable habitat, a discussion of this species is included in the analysis as it is widespread in the surrounding area and could potentially move through the project site on rare occasions during the rainy season.

### **San Francisco Dusky-Footed Woodrat**

The San Francisco dusky-footed woodrat, a large rodent found in woodland and scrub habitat, is a California Species of Special Concern. The species occurs throughout the San Francisco Peninsula, building large nest structures composed of sticks and woody debris, referred to as middens. As noted previously, one San Francisco dusky-footed woodrat was observed during site surveys, and it is presumed that others also occur onsite as several middens were observed on the vegetated hillside along the eastern portion of the site, as shown in Figure 4.3-2. As noted in the Biological Resources Assessment, most middens identified onsite are located outside of the primary project footprint; however, one midden was observed within the project footprint in a large wood debris pile and would likely be disturbed by project activities. In addition, several middens are located along the perimeter of the project footprint and could be disturbed by brush clearing or installation of fencing. There is also a high likelihood that middens are present within the impenetrable hazelnut scrub at the northeast portion of the project site, however, this area was too dense to be accessed, and no project construction will occur in this location.

### **Obscure Bumblebee**

Bumblebees have experienced dramatic population declines in recent decades. The obscure bumblebee is a closely related species to the western bumblebee (*Bombus occidentalis*) and is found exclusively in coastal grassland habitats. This species is designated as an Invertebrate of Conservation Concern in California due to its very high population decline and is therefore provided protection under CEQA. Like other native bumblebees, the obscure bumblebee nests underground in rodent burrows. Therefore, rodent burrows within the open fields and grasslands onsite were identified as having the potential to provide nesting habitat for this species. In addition, the obscure bumblebee nectars on a variety of native and non-native flowering plant species and could potentially forage within weedy areas on the project site margins. Site surveys were performed in September and October, outside of the primary active season for bumblebees, which generally occurs in spring to early summer and as such it cannot be conclusively determined whether the species is present or absent on the project site. Due to the existing structures and athletic fields on site it was determined that the site is largely deficient of suitable habitat, and therefore was assessed as having a

low potential for occurrence.

### **California Red-Legged Frog**

The California red-legged frog is a federally Threatened species and California Species of Special Concern. Habitat for this species consists of ponds, slow moving streams with emergent wetland and/or riparian vegetation for cover, and adjacent upland habitats for dispersion. The project site is located approximately 0.2 miles west of USFWS-designated critical habitat for this species. Due to a lack of suitable breeding and foraging habitat within and around the project area, it is unlikely that California red-legged frogs would be encountered within the project site and therefore was assessed as having a low potential for occurrence. However, it is possible that individuals of this species could cross through the property on rare occasions during the rainy season. While it is possible that individual frogs enter or cross through the property, there are no suitable aquatic habitats in or around the project site such as breeding ponds or streams which could serve as attractants to California red-legged frogs.

### **Special-Status Bats**

Buildings on site were visually inspected for signs of roosting bats including in the building eaves, roof areas, walls, and ground areas below potential roost sites. It was determined that small crevice roosting bats (*Myotis spp.*) may utilize portions of the building where the size of gaps between the gutter and fascia is one-quarter inch in width. Though there is the potential for these species to occur onsite, no sign of bats, such as guano or urine staining, were observed during site surveys conducted in September and October 2021. As such, it is not expected that any bats, including special-status bat species, are currently utilizing the structures on site. However, bats could colonize the existing buildings in the future as it provides suitable roosting habitat.

In addition to the existing structures onsite, large conifer trees, including Monterey cypress and Monterey pine found on the eastern slopes and western perimeter of the project site could provide suitable habitat for tree roosting bats such as the hoary bat (*Lasiurus cinereus*) which is identified as having moderate potential to occur onsite. The hoary bat is designated by CDFW as Apparently Secure (rank S4), which means the species is at fairly low risk of extinction in the state but is identified as having some cause for concern as a result of local population declines, threats, and other factors and as such is provided protection under CEQA Guidelines Section 15380. The hoary bat is a solitary bat species and is not known to form breeding colonies in the San Francisco Bay Area, however, individual bats could roost

within the foliage of larger trees present onsite.

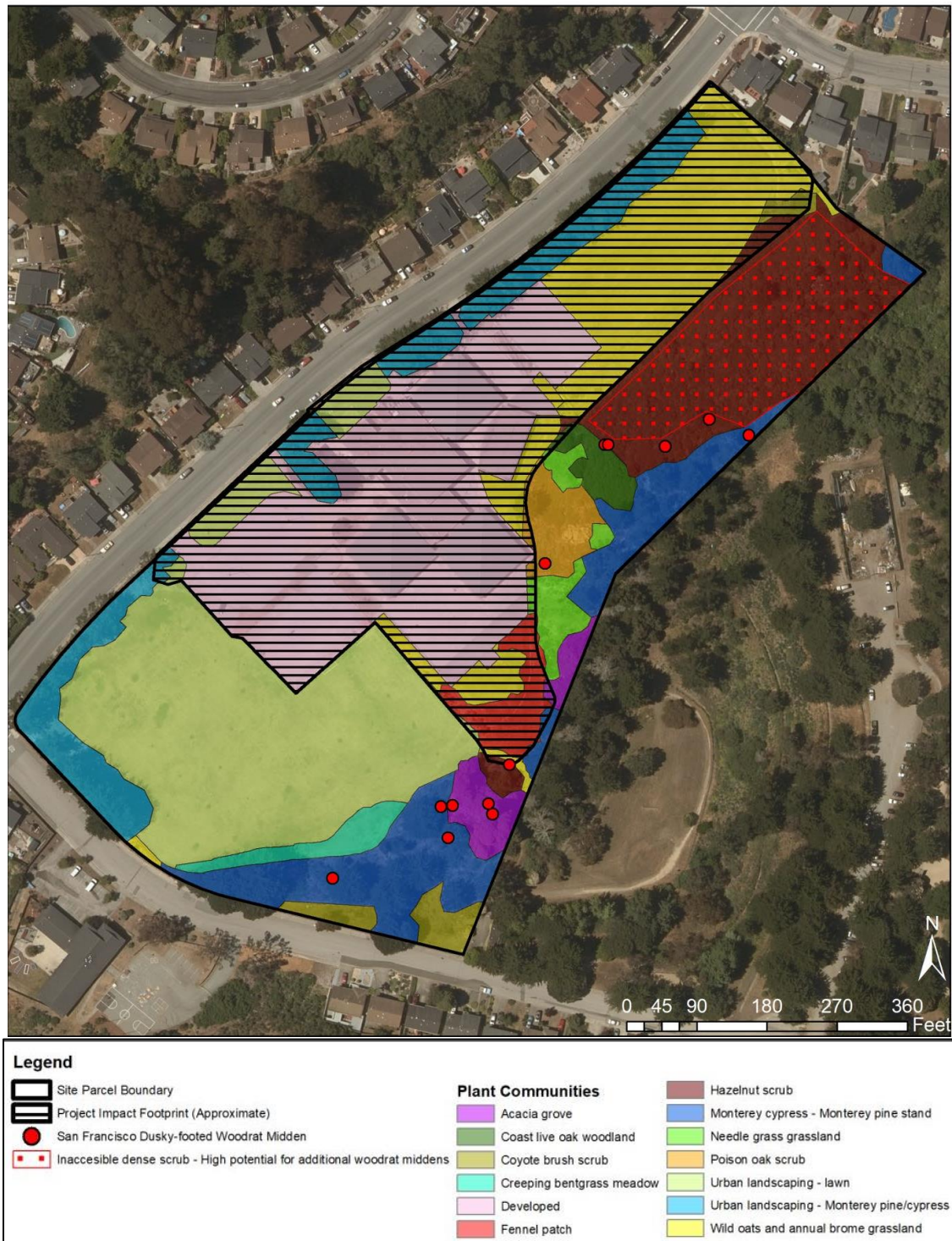
### **Nesting Birds**

During site surveys, several bird species were observed foraging onsite within the scrub and forested areas along the eastern hillside. In addition to providing foraging habitat, the vegetated hillside and trees along the eastern portions of the project site also provide significant nesting habitat for the various bird species. As such, targeted nesting bird surveys will be required to avoid disturbance if construction activities are performed during the bird nesting season, which occurs from approximately February 1<sup>st</sup> to August 31<sup>st</sup>.

### *Special-Status Plant Species*

CNDDDB records document several special-status plant species within five miles of the project site, as shown in Figure 4.3-5. However, most of these special-status plant species are found in specific habitats that are not present on the project site including coastal prairie, chaparral, saline/alkaline wetlands, coastal sand dunes, and serpentine outcrops. Furthermore, existing development occupies the site. None of the perennial rare plant species known to occur in the area were observed during site surveys, however there is a moderate potential for one annual species, the Choris' popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*), to occur within the undisturbed habitat on the eastern slopes of the project site. This species is a rare annual herb found in a variety of habitats, including coastal scrub, woodland, and wet meadows, and is classified by the CNPS as fairly endangered in California. This species blooms from March to June and likely would not have been visible during site surveys conducted in September and October. While this species is unlikely to occur within the proposed development footprint, there is a moderate potential that it could be present within undisturbed habitat on the eastern slopes of the project site.

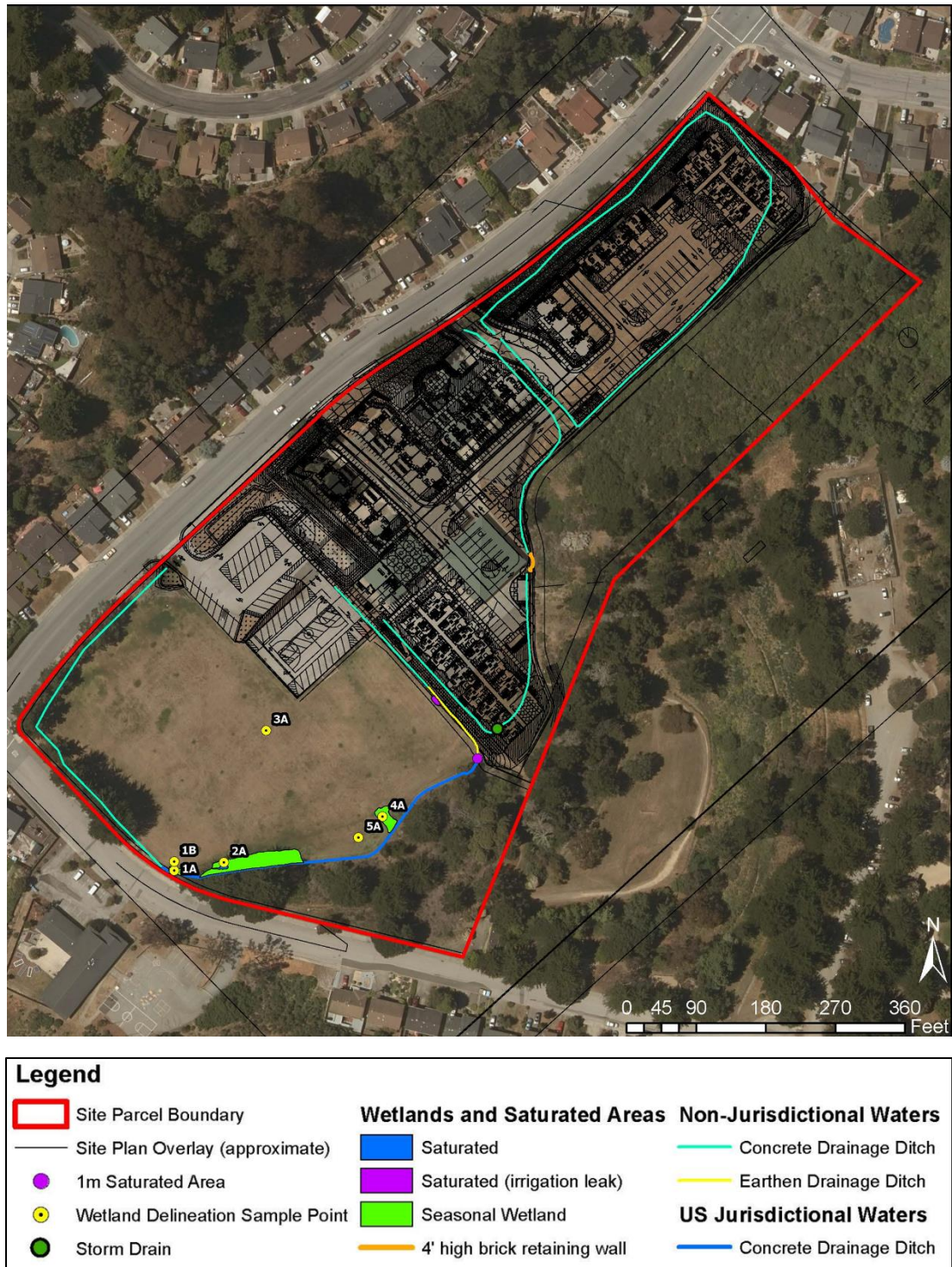


**FIGURE 4.3-2: SAN FRANCISCO DUSKY-FOOTED WOODRAT OBSERVANCES<sup>4</sup>**

<sup>4</sup> Biological Resources Assessment, prepared by Coast Ridge Ecology, November 2021, page 22, Figure 6: Project Impacts and Protected Resources

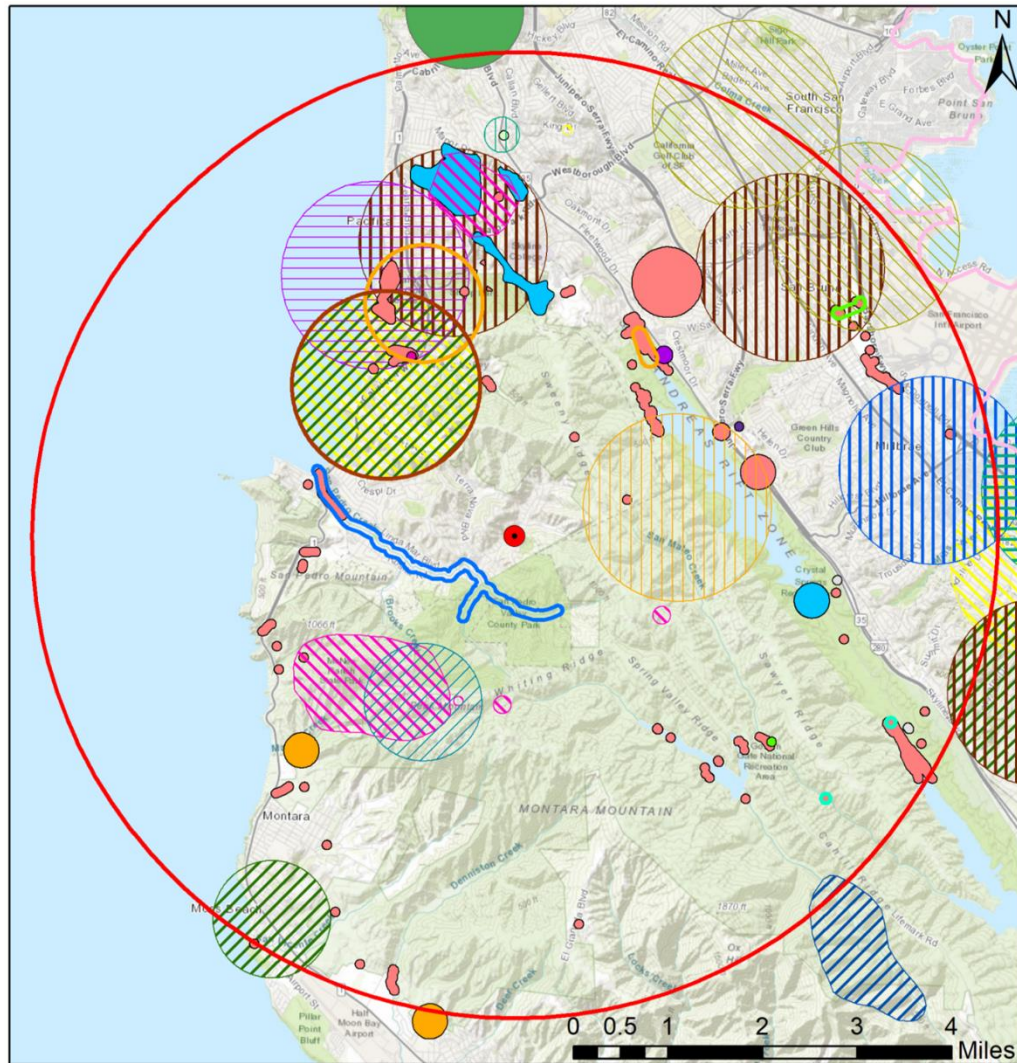


FIGURE 4.3-3: MAPPED WETLANDS AND WATERS<sup>5</sup>



<sup>5</sup> Wetland Delineation, prepared by Coast Ridge Ecology, November 2021, page 18, Figure 3: Wetland Impact Map



**FIGURE 4.3-4: SPECIAL-STATUS ANIMAL SPECIES CNDDDB OCCURRENCES<sup>6</sup>****Legend**

● Project Location

■ 5 mile buffer

**Occurrence Records**

■ Alameda song sparrow

■ American badger

■ American peregrine falcon\*

■ California Ridgway's rail

■ California giant salamander

■ California red-legged frog

■ Leech's skyline diving beetle

■ Mission blue butterfly

■ Myrtle's silverspot butterfly

■ North American porcupine

■ San Bruno elfin butterfly

■ San Francisco dusky-footed woodrat

■ San Francisco forktail damselfly

■ San Francisco gartersnake\*

■ Tomales isopod

■ Townsend's big-eared bat

■ big free-tailed bat

■ bumblebee scarab beetle

■ foothill yellow-legged frog

■ fringed myotis

■ hoary bat

■ longfin smelt

■ marbled murrelet

■ merlin

■ monarch (overwintering)

■ obscure bumble bee

■ pallid bat

■ saltmarsh common yellowthroat

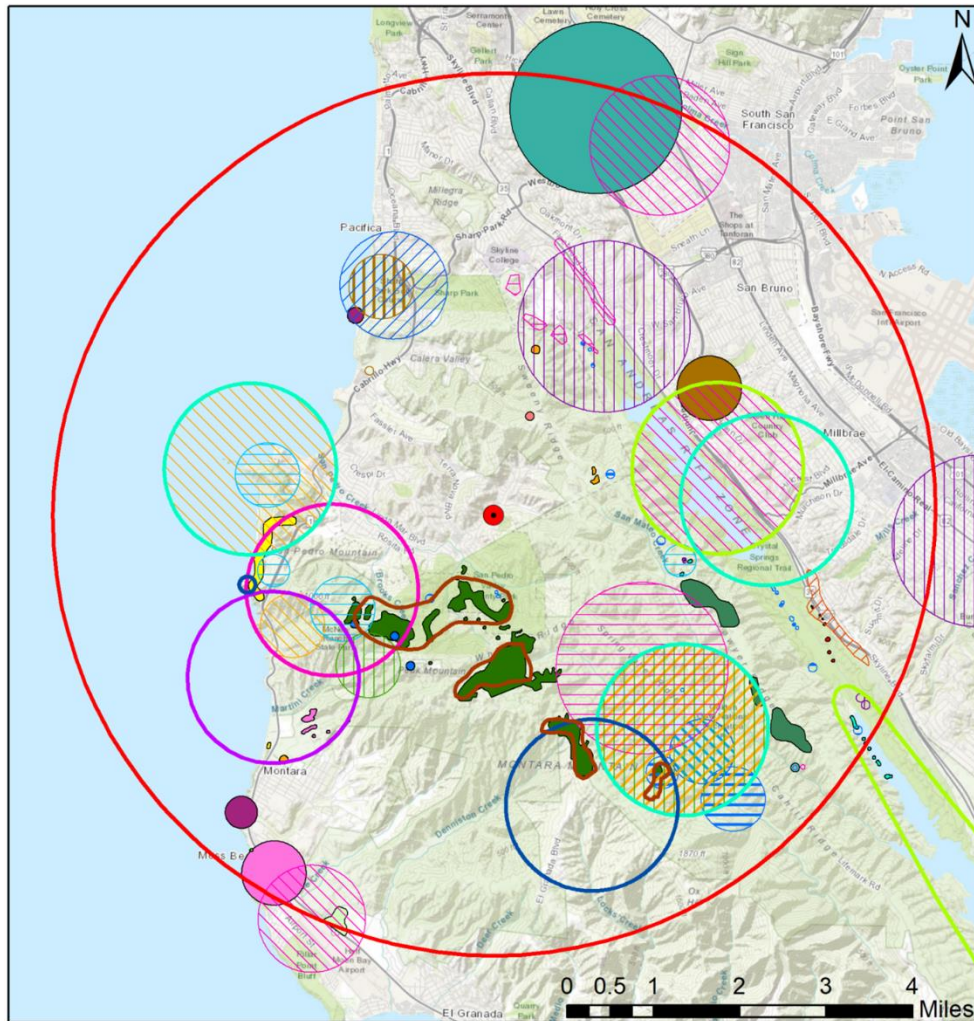
■ steelhead (CCC)

■ western bumble bee

■ western pond turtle

\*Species with protected records not shown on map

<sup>6</sup> Biological Resources Assessment, prepared by Coast Ridge Ecology, November 2021, page 18, Figure 4: CNDDDB Occurrences Map (Animals)

**FIGURE 4.3-5: SPECIAL-STATUS PLANT SPECIES CNDDB OCCURRENCES<sup>7</sup>**

Legend		
● Project Location	■ Montara manzanita	■ Valley Needlegrass Grassland
■ 5 mile buffer	■ Northern Maritime Chaparral	■ arcuate bush-mallow
<b>Occurrence Records</b>		
■ Blasdale's bent grass	■ Oregon polemonium	■ coast yellow leptosiphon
■ Choris' popcornflower	■ Ornduff's meadowfoam	■ coastal triquetrella
■ Crystal Springs lessingia	■ Point Reyes horkelia	■ congested-headed hayfield tarplant
■ Franciscan onion	■ San Francisco Bay spineflower	■ fragrant fritillary
■ Franciscan thistle	■ San Francisco campion	■ island tube lichen
■ Hickman's cinquefoil	■ San Francisco collinsia	■ pappose tarplant
■ Hillsborough chocolate lily*	■ San Francisco gumplant	■ perennial goldfields
■ Kellogg's horkelia	■ San Francisco owl's-clover	■ rose leptosiphon
■ Kings Mountain manzanita	■ San Mateo woolly sunflower	■ western leatherwood
	■ Scouler's catchfly	■ white-rayed pentachaeta
	■ Serpentine Bunchgrass	■ woodland woollythreads

\*Species with protected records not shown on map

<sup>7</sup> Biological Resources Assessment, prepared by Coast Ridge Ecology, November 2021, page 19, Figure 5: CNDDB Occurrences Map (Plants and Bryophytes)



### **4.3.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant impact to biological resources if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

### **4.3.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

Impacts to biological resources resulting from implementation of the proposed project are discussed below. The impact analysis contained herein is based on the Biological Resources Assessment (Appendix 4.3-A) and Wetland Delineation (Appendix 4.3-B). Impacts to biological resources are assessed using the significance criteria listed in 4.3.3, above. This analysis identifies the potential direct and indirect impacts to biological resources from construction, operation, and maintenance activities related to the proposed project.

***Impact BIO-1: The project could result in a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (potentially significant impact).***

The project site is located on 12.49 acres, of which the proposed residential development and recreational field will occupy 10.36 acres. The remaining 2.13 acres of the site is comprised of the steeply sloped hillside along the eastern portions of the site and will be preserved as part of the project. As discussed previously and as detailed in the BRA, the project site contains suitable and marginally suitable habitat for special-status species.

#### *Special-status Animal Species*

##### **San Francisco Dusky-footed Woodrat**

During site surveys, middens associated with the San Francisco dusky-footed woodrat, a special-status species, were observed onsite including one midden within the area proposed for development. As such, the project could result in potentially significant impacts to this special-status species through removal of habitat and disturbance during construction activities. To avoid and reduce potential impacts to the Woodrat, the project is required to implement Mitigation Measures BIO-1 and BIO-2. **Mitigation Measure BIO-1** requires pre-construction surveys to identify occupied middens and where present, the establishment of a minimum five-foot non-disturbance buffer from all occupied middens to be maintained throughout construction of the project. In addition, a five-foot buffer shall be established for areas that are inaccessible due to the presence of dense native vegetation on the steeply sloped hillsides along the eastern portion of the site. **Mitigation Measure BIO-2** requires preparation and implementation of a relocation plan, in the event that impacts to occupied middens cannot be avoided. With incorporation of measures BIO-1 and BIO-2, potential impacts resulting from modification of habitat suitable for the San Francisco dusky-footed woodrat will be reduced to less than significant levels.

##### **Obscure Bumblebee**

As detailed above, the project site provides potential nesting and foraging habitat for the obscure bumblebee within the open fields and weedy vegetation at the project site margins. Though the obscure bumblebee was not observed during site surveys, and occurrence potential onsite was determined to be low due to the presence of existing structures and athletic fields that are regularly use by the public, if present the project could result in

potentially significant impacts through habitat modification. As such, the project shall implement **Mitigation Measure BIO-3** which requires incorporation of plants that support the obscure bumblebee into the proposed landscape plan. With implementation of measure BIO-3, impacts resulting from modification of foraging habitat for the obscure bumblebee will be reduced to less than significant levels.

### **California Red-Legged Frog**

As detailed in the BRA, the project site does not contain suitable breeding or foraging habitat for the red-legged frog. Although critical habitat for the red-legged frog is located approximately 0.2 miles west of the project site, there are no suitable aquatic habitats on or adjacent to the project site that would attract individuals to the project site. Though unlikely to occur, individual red-legged frogs could pass through the project site during the rainy season. In the event that construction commences during the rainy season, the project shall comply with **Mitigation Measure BIO-4**, which requires that a qualified biologist conduct pre-construction surveys no more than five days prior to ground-disturbing activities and provide recommendations for the installation of exclusion fencing, if warranted based on the red-legged frog migration window, rainfall, inundation, and other factors. If warranted, the qualified biologist shall supervise installation of exclusion fencing, periodically inspect fencing to ensure it is properly maintained during construction activities, and ensure that all exclusionary fencing materials are fully removed following construction. With implementation of measure BIO-4, potential impacts to the red-legged frog, will be reduced to less than significant.

### **Special-status Bats**

Existing trees and buildings onsite provide potentially suitable roosting habitat for the hoary bat, which has a state rank S4, meaning that while the species is at fairly low risk of extinction in the state, there is some cause for concern due to local population declines, threats, and other factors. As such, the harming or killing of these species through destruction of habitat could result in a significant impact under CEQA. To reduce potential impacts to special-status bats, the project shall be required to implement **Mitigation Measure BIO-5**, which requires that a qualified biologist conduct pre-construction surveys no more than 14 days prior to commencement of ground disturbing activities. Should special status bats or evidence of bat roosts be observed within structures proposed for demolition, the City of Pacifica and the CDFW shall be notified and an appropriate exclusion method shall be established and executed by a qualified biologist. To avoid hibernation and rearing periods, all ground disturbing activity within 50 feet of areas identified as bat habitat shall be restricted to

between August 31<sup>st</sup> and October 15<sup>th</sup> or March 1<sup>st</sup> to April 15<sup>th</sup>. Should ground disturbing activities occur outside of the time periods provided above, implementation of BIO-5, which requires pre-construction bat surveys shall be required. With implementation of BIO-5 potential impacts to bats including special-status bats will be reduced to less than significant.

### ***Nesting Birds***

As noted in the BRA, several bird species were observed foraging onsite within the scrub and forested areas along the eastern hillside. In addition to foraging habitat, the vegetated hillside and trees along the eastern portions of the project site also provide nesting habitat for various bird species. As proposed, the project will remove seven trees along the western portion of the project site. Although the trees along the western portion of the site were not specifically identified as nesting habitat in the BRA, there remains a potential that trees proposed for removal could provide nesting habitat and their removal could impact special-status birds that may be nesting on-site. To reduce potential impacts to nesting birds, the project shall be required to implement **Mitigation Measure BIO-6**, which requires that preconstruction nesting bird surveys be conducted no more than 14 days prior to commencement of ground disturbing activities when construction is proposed to begin during the bird nesting season (February 15 to September 15). Should active nests be identified, a non-disturbance buffer shall be established at a distance of 100 feet for passerines and 300 feet for raptors, or as otherwise recommended by a qualified biologist to avoid occupied nests until the young have fledged. In addition, Mitigation Measure AES-1 as set forth in Section 4.1 Aesthetics requires incorporation of all applicable tree protection recommendations set forth in the arborist report as well as replacement of trees proposed for removal. With implementation of measure BIO-6 and AES-1 potential impacts to special-status bird species and migratory birds will be reduced to less than significant levels.

### ***Special Status Plant Species***

The Choris' popcornflower has a CNPS rank of 1B.2, which includes rare, threatened, or endangered plant species and was identified as having moderate potential to exist within the eastern undeveloped portion of the project site, though the presence could not be confirmed during the initial site survey as it was conducted outside of the blooming season (March to June). On May 3, 2022, the parcel and adjacent vegetated slopes east of the site were surveyed by walking and inspecting all vegetation growing on the property and adjacent eastern slopes. The survey was intended to identify rare plants, including Choris' popcornflower. On the previous day, (May 2, 2022), a known colony of Choris' popcornflower was inspected, and it was verified that the species was flowering and highly visible at the

time of this survey, indicating that the species would be in bloom on the site at that time, if present. As detailed in the Rare Plant Survey (Appendix 4.3-D) prepared for the project, no rare plants, including Choris' popcornflower were identified on the site. Despite not being present on the site at the time of the May survey, there remains a moderate potential for this species to occur onsite, however, the portions of the project site that provide suitable habitat are limited to areas that are currently undeveloped and will remain undeveloped as part of the proposed project. Furthermore, **Mitigation Measure BIO-1** requires establishment of a minimum five-foot non-disturbance buffer from the sloped hillside which will also ensure that, if the Choris' popcornflower is present in this area, impacts will be avoided. Therefore, potential impacts of the project to the popcornflower, if present in the sloped hillside area outside of the development footprint, will be reduced to less than significant levels.

#### *Conclusion*

In conclusion, the project has the potential to result in significant impacts to special-status species including the San Francisco dusky-footed woodrat, obscure bumblebee, California red-legged frog, special-status bats and birds, and Choris' popcornflower as a result of habitat modification and direct impacts to individuals. However, the requirement to conduct pre-construction surveys and establish appropriate non-disturbance buffers as required by Mitigation Measures BIO-1 through BIO-6 will reduce potentially significant impacts to less than significant levels.

***Impact BIO-2: The project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service (no impact).***

The Wetland Delineation prepared by Coast Ridge Ecology did not identify any portions of the project site that would qualify as a riparian habitat. Additionally, the BRA did not identify any sensitive natural communities that would be impacted by the project as most of the vegetation present onsite is non-native, and the native eastern hillside will remain undeveloped. As such, the project would not result in substantial adverse effects on any riparian habitat or other sensitive natural community and there would be no impact.

***Impact BIO-3: The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (potentially significant impact).***

The Wetland Delineation prepared by Coast Ridge Ecology identified approximately 0.063-acres of seasonal wetlands, predominately comprised of non-native grasses, at the edge of the southern recreational field. Additionally, the Wetland Delineation identified 141 linear feet of Waters of the United States within an existing concrete drainage channel that runs through the project site which will be repaired and replaced in kind as part of the project. A portion of the channel located within the southern recreational field drains to an existing storm drain at the southeast corner of the site, whereas the remaining portions of the drainage channel, comprised of approximately 847 linear feet, do not transport water, and therefore would not be considered Waters of the United States.

As proposed, development of the residential portion of the project would occur approximately 100-feet from the mapped wetlands except for repairs that will be made to the jurisdictional portion of the drainage channel located adjacent to mapped wetlands in the southern recreational field. Based on the proximity of the proposed development to the northernmost portion of the concrete drainage ditch as well as the proximity of the drainage ditch to mapped wetlands, indirect impacts to Waters of the United States could result from construction activities if not properly protected and adequate development buffer maintained. As such, the project shall comply with **Mitigation Measure BIO-7**, which provides for avoidance measures and best management practices during construction to ensure that the seasonal wetlands and the drainage channel are preserved and adequately protected. The project will not result in removal, fill, or hydrological interruption of the existing wetlands onsite or the drainage channel adjacent to the area proposed for development, however construction activities associated with repair of the concrete drainage ditch could result in removal, alteration, or destruction of wetland plants. Repair of the drainage ditch will be subject to USACE Nationwide Permit 41 (Reshaping Existing Drainage and Irrigation Ditches) which involves modification of currently serviceable drainage and irrigation ditches constructed in waters of the United States, for the purpose of improving water quality. As provided by USACE, reshaping of the drainage ditch cannot increase drainage capacity beyond the original as-built capacity nor can it expand the area drained by the drainage ditch as originally constructed. Compensatory mitigation is not required because the work is designed to improve water quality. To reduce temporary impacts to seasonal wetlands as a result of construction activities, the project shall comply

with **Mitigation Measure BIO-8**, which requires replanting of wetland plants at a 1:1 ratio in the event that such plants are removed, altered, or destroyed. Through compliance with the Nationwide Permit 41 and with implementation of measures BIO-7 and BIO-8, potential impacts to jurisdictional waters resulting from construction of the project will be reduced to less than significant.

In addition to temporary construction impacts, ongoing operation of the project could result in impacts to seasonal wetlands and the concrete drainage ditch associated with use of the recreational field over time. To protect jurisdictional waters during project operation, **Mitigation Measure BIO-9** shall be implemented which requires installation of split rail fencing which will restrict access to the seasonal wetlands and concrete drainage ditch thereby ensuring the continued existence of these features. With implementation of BIO-9 impacts to jurisdictional waters at project operation will be less than significant.

***Impact BIO-4: The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites (less than significant impact).***

Movement to and from the subject property is restricted to the west, north, and south by existing development along Oddstad Boulevard, Big Bend Drive, and Yosemite Drive, respectively, but is open and unrestricted on its eastern border to Frontierland Park. This portion of the property is where the dusky-footed woodrat is known to have middens. As proposed, the project includes installation of a retaining wall along the eastern portion of the developed area of the site and the steeply sloped hillside. Between the steeply sloped hillside and Frontierland Park, adjacent to the project site, there is no proposed development that would create a barrier to movement. Furthermore, no new major arterial roads are proposed which would restrict wildlife movement, and movement within the undeveloped portion of the property will remain unrestricted. The proposed development will not result in a barrier to wildlife movement and as such impacts of the project will be less than significant.

***Impact BIO-5: The project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (potentially significant impact).***

The project site contains heritage and protected trees, some of which are proposed for removal. As proposed, the project will remove seven trees, one of which is identified as a



heritage tree and five as protected trees and as such are subject to the provisions of Title 4, Chapter 12 of the Pacifica Municipal Code. As provided therein, when trees are proposed to be preserved as part of a development project, a tree protection plan as noted in Section 4-12.07 is required. The Arborist Report prepared for the project identifies tree protection recommendations, consistent with the requirements of the municipal code. As set forth in **Mitigation Measure AES-1**, the project is required to incorporate all tree protection recommendations set forth in the Arborist Report as well as replacement recommendations contained in the Tree Replacement Recommendation Memorandum, subject to approval by the City of Pacifica Planning Commission. Implementation of measure AES-1 will ensure that the project does not conflict with any local policies or ordinances protecting biological resources and impacts of the project will be less than significant.

***Impact BIO-6: The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (no impact).***

There are no adopted Habitat Conservation plans, Natural Community Conservation Plans or other approved local, regional, or state habitat conservation plans within the project area. Therefore, there is no potential for the project to conflict with the provisions of any local, regional, or state plan and as such the project would result in no impacts.

### ***Mitigation Measures***

**BIO-1:** Prior to the start of grading, construction, or any other ground-disturbing activity, a pre-construction survey shall be conducted by a qualified biologist to identify occupied San Francisco dusky-footed woodrat middens onsite. Where feasible, occupied middens shall be avoided and a minimum five (5) foot non-disturbance buffer, or greater buffer as otherwise recommended by a qualified biologist, shall be established, maintained, and monitored throughout project construction. Additionally, a minimum five (5) foot non-disturbance buffer, or greater buffer as otherwise recommended by a qualified biologist, shall be established between the eastern limit of proposed development activities and the densely vegetated, impenetrable hazelnut scrub habitat.

**BIO-2:** To address potential impacts to San Francisco dusky-footed woodrats, a Relocation Plan prepared by a qualified biologist, shall be prepared and submitted to the City of Pacifica and the California Department of Fish and Wildlife for review and approval. At a minimum, the Relocation Plan shall include, but is not limited to, the following:



- Nests requiring relocation shall be dismantled by construction crews by hand and under the direct supervision of a qualified biologist.
- Each member of the construction crew shall receive an environmental awareness training regarding San Francisco dusky-footed woodrat ecology and specifics of the Relocation Plan.
- All material removed during nest dismantling shall be moved into the Relocation Area, as determined by the qualified biologist, and constructed into piles suitable for habitation or use as refugia.
- If an active nest requires removal, the following phased dismantling protocol shall be implemented:
  - ♦ Remove at least 50-100% of the existing canopy cover and begin dismantling.
  - ♦ After partially dismantling the nest, leave nest alone for two to four days to allow woodrats to disperse on their own. After two to four days, continue to disassemble nest by hand. Plan to completely dismantle in two to three sessions.
  - ♦ If young are present, the construction crew and qualified biologist shall cease dismantling of the nest for 48 hours to allow the adult to move the young. If the young have been moved and the nest is vacant, nest removal may resume.
- If an inactive nest (as determined by a qualified biologist) needs to be removed, it may be removed completely in one day. If woodrats are observed within or fleeing from the nest, the nest will be considered active and relocated using a phased approach.

**BIO-3:** To offset the loss or disturbance of foraging habitat (native forbs and shrubs) for the special-status obscure bumble bee (*Bombus caliginosus*), plant species that are known nectar sources of the obscure bumble bee shall be replaced at a 2:1 ratio, or as otherwise recommended by a qualified biologist and CDFW and shall be included in a revised landscaping plan. Plant species shall be sited in concentrated locations selected in consultation with a qualified biologist and CDFW as necessary to ensure the long-term survival of such plants and to limit disturbance throughout project operation. Plant species known to benefit the obscure bumble bee include but are not limited to Ceanothus, Cirsium, Clarkia, Lathyrus, Lotus, Lupinus, Rhododendron, Rubus, Trifolium, and Vaccinium. As part of the update to the landscaping plans, selected bee-friendly species and planting locations shall be confirmed by a qualified biologist in consultation with the City of Pacifica.

**BIO-4:** If construction commences during the rainy season, a qualified biologist shall conduct a pre-construction survey for California red-legged frog no more than five days prior to commencement of ground disturbing activities. In the event that California red-

legged frogs are found onsite, the qualified biologist in consultation with CDFW shall provide recommendations for relocation of individuals and installation of exclusion fencing. At the recommendation of CDFW and the qualified biologist and based on factors including the migration window for red-legged frog, rainfall, and inundation, exclusion fencing shall be installed. Exclusion fencing shall be inspected and maintained under the supervision of a qualified biologist. Results of the survey and recommendations for relocation and exclusion fencing shall be submitted to the City of Pacifica.

**BIO-5:** To avoid potential impacts to special-status bats, a qualified biologist shall conduct a pre-construction survey of all structures and trees that would be impacted by the project, no more than 15 days prior to demolition, tree removal, or commencement of ground disturbing activities. Results of the preconstruction survey shall be documented by a qualified biologist and provided to the City of Pacifica. If special-status bat species are found roosting in building or trees proposed to be removed, the biologist shall determine if there are young present (i.e., the biologist should determine if there are maternal roosts). If young are found roosting in any tree or building proposed for removal, such impacts shall be avoided until the young are flying and feeding on their own. A 100 foot non-disturbance buffer, or as otherwise specified by a qualified biologist, installed with orange construction fencing shall be established around maternity site. If adults are found roosting in a tree or building on the project site but no maternal sites are found, then the adult bats can be flushed, or a one-way eviction door can be placed over the tree cavity for a 48-hour period prior to the tree removal or building demolition. If bats or evidence of bats are detected during the pre-construction surveys, the applicant shall notify the City of Pacifica and the CDFW regarding bat eviction protocol and submit a plan for review and acceptance by the City of Pacifica and the CDFW.

**BIO-6:** Should construction activities commence during the bird nesting season (February 1 to August 31), a pre-construction nesting bird survey shall be conducted by a qualified biologist no more than 14 days prior to the start of construction activities. Areas within 500 feet of construction shall be surveyed for active nests. Should active nests be identified, a 100 foot buffer for passerines and 300 foot buffer for raptors shall be established, or as otherwise specified by a qualified biologist based on the needs of the species as set forth by CDFW and shall be maintained until a qualified biologist verifies that the nestlings have fledged, or the nest has failed. Should construction activities cease for 14 consecutive days or more within the nesting season, an

additional nesting bird survey shall be required prior to resuming construction. Results of the pre-construction nesting bird survey shall be submitted to the City of Pacifica.

**BIO-7:** Indirect impacts to the seasonal wetlands and jurisdictional drainage feature shall be avoided through implementation of best management practices (BMPs) prior to earthwork. Construction exclusion zones shall be established by installing appropriate construction fencing, silt fencing, wildlife friendly hay wattles (no monofilament netting), gravel wattles, and other protective measures between project activities and the seasonal wetlands and drainage feature.

All non-native, invasive vegetation removed shall be discarded offsite and away from wetland areas to prevent reseeding.

Prior to implementation of the construction project, a biological monitor shall inspect installation of BMPs to ensure proper protection of the seasonal wetlands and jurisdictional drainage feature areas are in place. BMPs shall thereafter be routinely inspected by the construction manager to ensure BMPs remain in place for the duration of construction activities. Upon completion of project construction all exclusion fencing shall be removed along with any temporary BMPs.

**BIO-8:** A total of 0.063 acres of potential wetlands were identified in the project area. In the event that wetland plants are removed, altered, or destroyed along the edges of the concrete drainage ditch during repair/replacement of the concrete drainage ditch, the applicant shall replant these areas with native wetland plants at a 1:1 ratio to ensure continued viability of the wetlands.

**BIO-9:** To avoid impacts to jurisdictional waters and wetlands throughout project operation, plans submitted for building permit shall be revised to include a split rail fence with minimum three foot and maximum 6 foot height along the boundary between the recreational field and seasonal wetlands and concrete drainage ditch located at the southeast portion of the project site to preclude access and limit foot traffic within the drainage and wetland features. The design of the fence shall be submit to review and approval by the Planning Director.

#### **4.3.5 APPENDICES**

- Appendix 4.3-A: Biological Resources Assessment, prepared by Coast Ridge Ecology, November 2021
- Appendix 4.3-B: Wetland Delineation, prepared by Coast Ridge Ecology, November 2021

- Appendix 4.3-C: Arborist Report, prepared by Traverso Tree Service, March 18, 2020
- Appendix 4.3-D: Rare Plant Survey, prepared by Coast Ridge Ecology, May 31, 2022

#### **4.3.6 REFERENCES**

1. California Fish and Game Code
  - a. Division 2. Department of Fish and Wildlife
  - b. Division 3. Fish and Game Generally
  - c. Division 4. Birds and Mammals
2. Pacifica Municipal Code
  - a. Title 4, Chapter 12: Preservation of Heritage Trees
3. United States Army Corps of Engineers, Nationwide Permit 41 – Reshaping Existing Drainage and Irrigation Ditches, Effective February 25, 2022, NWP Final Notice, 86 FR 73522
4. United States Code
  - a. Title 33 – Navigation and Navigable Waters
  - b. Title 16 – Conservation

## 4.4 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section summarizes the regulatory framework for evaluating cultural and tribal cultural resources, describes the existing cultural and tribal cultural setting of the site and surrounding area, and analyzes potential impacts to cultural and tribal cultural resources that could result from implementation of the proposed project. The following documents were used to analyze the potential impacts that could occur:

- Historic Resource Evaluation, Evans & De Shazo, December 30, 2021.
- Cultural Resources Study, Evans & De Shazo, December 30, 2021.

### 4.4.1 REGULATORY CONTEXT

#### ***Federal***

##### *National Historic Preservation Act*

The National Historic Preservation Act (NHPA) was passed in 1966 and established the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Offices (SHPO), the National Register of Historic Places (NRHP), and Section 106 review process. The goal of the NHPA is to encourage federal agencies to act as responsible stewards of the Nation's historic resources including those listed on or eligible for listing on the NRHP. The NRHP recognizes buildings, structures, sites, districts, and objects equal to or greater than fifty years old which are determined to be significant with respect to American history, architecture, archeology, engineering, or culture, and at the local, state, or national level. To be determined eligible for listing on the NRHP a resource must also retain integrity in terms of location, design, setting, materials, workmanship, feeling, and association.

Resources determined eligible for listing or listed on the NRHP, are afforded protection under Section 106 of the NHPA (as well as under the California Environmental Quality Act). The Section 106 process is intended to carry out the mission of the NHPA in that, when there is a federal or federally licensed action that has the potential to impact historic resources, impacts must be identified, assessed, and minimized where possible.

The NRHP was established to recognize cultural resources associated with the accomplishments of all peoples who have contributed to the country's history and heritage. Cultural resources are defined as physical evidence or places of past human activity including sites, objects, landscapes, structures, or natural features that are of significance to a group of people traditionally associated with an area. Examples of cultural resources can include archaeological resources, historic structures, cultural landscapes, ethnographic resources,

and museum objects. Guidelines for nominating cultural resources to the NRHP are based on the resource's significance and integrity. As noted in the National Park Service, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, significance is determined using the four criteria for evaluation which include resources that:

- Are associated with events that have made a significant contribution to broad patterns of our history (Criterion A)
- Are associated with the lives of persons significant in our past (Criterion B)
- Embody distinctive characteristics of type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (Criterion C)
- Have yielded, or are likely to yield, information important in prehistory or history (Criterion D).

Upon determination of a resource's significance, an evaluation of a potential resource's integrity should be performed, where integrity is defined as the ability to convey significance. There are seven aspects of integrity including location, design, setting, materials, workmanship, feeling, and association. If a resource is considered significant based on the four criteria provided above and retains integrity, it is eligible for listing on the NRHP. When a cultural resource is added to the NRHP, it is automatically included on the California Register of Historical Resources (CRHR).

### **State**

#### *California Environmental Quality Act*

The California Environmental Quality Act (CEQA) specifies that a project may result in a significant impact to the environment if it would cause a substantial adverse change in the significance of a historical resource (CEQA Guidelines Section 15064.5 [b]). A substantial adverse change in the significance of a historical resource would occur if a project would result in the demolition or alteration of a historical resource in a manner that adversely impacts the physical characteristics that convey a resources' significance and that justify its eligibility for listing on the CRHR. For the purposes of CEQA, a resource is considered historically significant if it is:

- Listed or eligible for listing on the California Register of Historical Resources;
- Listed or eligible for listing on the National Register of Historic Places;
- Included in a local register of historical resources, as defined in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resource Code;
- An object, building, structure, site, area, place, record, or manuscript which a lead agency

determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record;

- Meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, Section 5024.1, Title 14 CCR, Section 4852).

### **California Register of Historic Resources**

The SHPO maintains the state's list of Historic Resources, known as the CRHR. The CRHR recognizes buildings, structures, sites, districts, and objects, 45 years or older and which are significant with respect to American history, architecture, archeology, engineering, or culture, and at the local, state, or national level. In addition to resources that qualify for the NRHP, the CRHR can include properties designated under local ordinances and through individual or district wide resource surveys. Similar to the significance criteria for determining eligibility under the NRHP, a historic resource may be considered significant and eligible for listing on the CRHR if it:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1)
- Is associated with the lives of persons important in our past (Criterion 2)
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (Criterion 3)
- Has yielded, or may be likely to yield, information important in prehistory or history (Criterion 4)

### *California Historical Building Code*

The California Historical Building Code, provided in Part 2.7 of the Health and Safety Code, Division 13, Sections 18950 through 18962 sets forth alternative building regulations and standards to encourage the rehabilitation, preservation, restoration or relocation of historical buildings, structures, and properties determined to have importance to the history, architecture, or culture of an area. The use of the California Historical Building Code is not mandated but provides alternatives to property owners interested in retaining character defining features of their historic resources.

### *Senate Bill 18*

SB 18 became effective in 2005 and requires local governments to consult with California Native American tribes when a General Plan Amendment is proposed or if open space will be developed for the first time. SB 18 sets forth requirements for local governments to

consult with Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. The intent of SB 18 is to provide an opportunity for California Native American tribes to participate in land use decisions early in the planning process for the purpose of protecting or mitigating impacts to cultural resources.

#### *Assembly Bill 52*

Assembly Bill 52 (AB 52) became effective in 2015 and requires that lead agencies provide written notice to California Native American tribes that have requested notification when development is proposed in their culturally affiliated area. AB 52 is intended to involve California Native American tribes early in the decision-making process and provides an opportunity for consultation with the local agency. Through the consultation process, tribes may propose project modifications to avoid potential impacts to tribal cultural resources and may provide direction on identifying and developing mitigation measures to reduce impacts to tribal cultural resources.

#### *Health and Safety Code*

Section 7052 of the Health and Safety Code identifies the disturbance of Native American cemeteries as a felony. Under Section 7050.5 of the Health and Safety Code, if human remains are discovered during construction activities, work within the vicinity of must be halted until the county coroner can determine whether the remains are those of a Native American. If remains are determined to be of Native American origin, the coroner must contact the California NAHC within 24 hours of this identification. A representative of the NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. In addition, CEQA Guidelines Section 15064.5 specifies the procedures to be followed in case of the discovery of human remains on non-federal land. The disposition of Native American burials falls within the jurisdiction of the NAHC.

#### *Public Resources Code*

Pursuant to Division 13, Chapter 2.6, Section 21083.2 of the Public Resources Code (PRC), the lead agency shall determine whether a project under CEQA may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the issue of those resources shall be addressed. A unique archaeological resource is defined as a resource that meets one of the three criteria listed in 21083.2 subdivision (g). This section of the PRC does not require analysis of non-unique archaeological resources where non-unique resources are defined as



those not meeting the criteria of subdivision (g). If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on that resource would not be considered a significant effect on the environment.

### **Local**

#### *City of Pacifica General Plan 1980*

The Historic Preservation Element of the General Plan provides policies, and long- and short-term action programs intended to protect and preserve historic and cultural resources in the City. Policies and programs particularly relevant to the project include the following:

- Historic Preservation Element
  - ♦ Conserve historic and cultural sites and structures which define the past and present character of Pacifica.
  - ♦ To ensure adequate protection and/or as a requirement to obtain funding for preservation, a detailed comprehensive survey should be conducted for specific historic or cultural sites and structures.

#### *Pacifica Municipal Code, Title 9, Chapter 7 (Historic Preservation)*

Title 9, Chapter 7 of the Pacifica Municipal Code establishes that historic preservation is in the interest of the public welfare and is a public benefit. The intent of the City's Historic Preservation Ordinance is to:

- Promote the use and enjoyment of historic and cultural resources
- Encourage preservation and continued use of historic landmarks
- Recognize and preserve structures, natural features, and sites with historic, archaeological, architectural, cultural, or aesthetic significance
- Foster appreciation and civic pride in the City and its past
- Protect and enhance the City's attractions for residents, tourists, and visitors and to strengthen the economy of the City
- Integrate the preservation of historic resources as early as possible into public and private planning and development processes
- Protect and enhance property values
- Increase economic and financial benefits to the City and its inhabitants.

### **4.4.2 ENVIRONMENTAL SETTING**

The following environmental setting includes site-specific information contained in the Historic Resource Evaluation (Appendix 4.4-A) and Cultural Resources Study (Appendix 4.4-B) prepared for the project by Evans & De Shazo and dated December 30, 2021.

### ***Historic Resource Evaluation***

Given that the school complex is older than 45 years old, a Historic Resource Evaluation (HRE) was prepared to evaluate the structure's eligibility for listing on the California Register of Historic Resources, and any associated environmental impact resulting from its demolition. The HRE included a records search, review of historical documents, and preparation of a historical architectural survey of the project area to identify the structure's age, style, character-defining features, materials, and any alterations that have been made.

#### *Records Search*

The HRE provides detailed information on ownership, construction, and occupancy of the site and associated built environment from 1966 to present as follows:

- 1964. The site was set aside by the Oddstad Development Company for development of a future school.
- 1966. The site was deeded to Laguna Salada Union School District (LSUSD), architectural plans for the Park Pacifica school were submitted and later approved.
- 1968. Construction of the school was complete, the school was renamed to Andy F. Oddstad School, also known as Oddstad Elementary School, the City dump located at the southwest corner of Oddstad Boulevard/Yosemite Drive was closed and turned into an open sports field.
- 1972. Three shed buildings accommodating additional classrooms were constructed.
- 2004. LSUSD changed its name to Pacifica School District.
- 2005. Oddstad Elementary School closed.

As noted in the HRE, the school structure features a Mid-Century Modern architectural style which is generally characterized by low profile, horizontal composition, use of modern materials, such as vast expanses of plate glass, and stylistic elements such as angular shapes, open floor plans, and stacked masonry veneer such as brick or stone. The building was designed by architect, Harold Crosby, who worked throughout his career on various types of buildings including educational, medical, research, transportation, and commercial facilities.

#### *Historic Architectural Survey*

The Historic Architectural Survey includes an analysis of the 1968 school building, 1972 shed building, and associated landscape as a single resource to determine eligibility for listing on the CRHR. Additionally, the 1968 school building was evaluated individually for its association with the Mid-Century Modern architecture. Eligibility of a resource is determined using the criteria previously discussed in Section 4.4.1. As such, the 1968 school building, 1972 shed building, and associated landscape were evaluated using the four eligibility criteria, and

concluded the following:

**Criterion 1 (Event).** As stated in the HRE, the 1968 school building, 1972 shed building, and associated landscape is associated with nearby residential development, but there is no evidence that construction of the school is associated with a significant event in California's history, nor was construction associated with the post-war housing boom of the 1940's and 1950's. Therefore, it is not eligible for listing on the CRHR under this criterion.

**Criterion 2 (Person).** Based on information identified during the records review, the HRE concludes that the 1968 school building, 1972 shed building, and associated landscape is not associated with a person important to our past, and therefore is not eligible for listing on the CRHR under this criterion.

**Criterion 3 (Construction/Architecture).** To meet eligibility for listing under this criterion, the property must express a specific phase or theme in the development of the master's career. While Harold Crosby is noted as being a successful architect in the San Francisco Bay Area, Crosby's work is not distinguished from other local architects, has not been recognized previously for inclusion on local, state, or national registers, and is not of a specific style for which he was known. Therefore, the HRE concludes that the buildings and landscape are not eligible for listing on the CRHR as a result of being a representative work of an important individual that possesses high artistic values in association with Crosby.

Though the 1968 school building contains elements of the Mid-Century Modern architectural design such as a flat roof, and irregular forms, the design lacks horizontal composition and other stylistic elements such as angular shapes and expansive ribbons of windows or plate glass. The building is a modest example of this architectural style and was likely designed to accommodate budget and function rather than be a strong representation of Mid-Century Modern architecture. As such, the HRE concludes that the 1968 school building is not a representative example of Mid-Century Modern architecture and therefore is not eligible for listing on the CRHR under this criterion.

**Criterion 4 (Information).** For a structure to be eligible for listing under this criterion, it must be a source of important information, such as exhibiting a local variation on a standard design or construction technique. If a study can yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development, it would be eligible for listing under this criterion. As stated in the HRE, the buildings do not convey important information about the history of Mid-Century Modern Architecture and therefore are not eligible for listing on the CRHR under this criterion.

As discussed in the Regulatory Context above, only after establishing significance for listing is an evaluation of integrity required. Since the 1968 school building, 1972 shed building, and associated landscape do not meet any of the eligibility criteria for listing on the CRHR, an evaluation of integrity was not performed.

### ***Cultural Resources Study***

To evaluate potential impacts to cultural and tribal cultural resources. The Cultural Resources Study (CRS) included a record search and literature review, sacred lands inventory and tribal outreach, and field survey.

#### ***Record Search and Literature Review***

The CRS reviewed information available at the Northwest Information Center (NWIC) including previous cultural resource studies conducted within one-half mile of the project site, and a review of documents including the OHP Built Resource Directory and Archaeological Resources Directory for San Mateo County, NRHP, CRHR, California Inventory of Historic Resources, California Historical Landmarks, California Points of Historical Interest, Ethnic Sites Survey for California, City of Pacifica Historical Landmarks, and Historic Sites Master List for San Mateo County. Results of the records review indicate six prior cultural resource studies have been conducted within one-half mile of the project site, including one that covered approximately 25 percent of the subject site. No resources were identified on the project site as a result of the prior study. The nearest recorded built environment resource is the Sanchez Elementary School, located approximately one mile southwest of the project site.

A review of historical documents indicates that the site and surrounding area was used for agricultural purposes from around 1769 until the 1860's. By the late 1870's the area had been subdivided and sold, however, no buildings were present at that time according to historical maps from 1894, 1909, 1910, 1915, 1927, and 1939. By 1939, two roads were present adjacent to the project site, including present day Oddstad Boulevard and were likely associated with agricultural uses in the area at the time. Aerial images from 1947 show an access road running through the project site and planted crops. Similarly, a 1956 map shows row crops on the project site. Following agriculture uses, the site was set aside for development of the school in the 1960's, which was constructed in 1968.

In addition to a review of available historical imagery, the CRS also included an evaluation of regional geological and soil studies which provide an understanding of environmental and climatic conditions as well as evidence of past human activity. Landforms with clear evidence

of soil formation are expected to have a higher likelihood of containing archaeological resources as people are attracted to stable surfaces as well as the ability of such surfaces to retain evidence of former occupation. Additionally, landforms such as alluvial fans, floodplains, and areas surrounding rivers and streams have a higher likelihood of containing buried resources. Other factors to be considered include slope, proximity to a water source, and the nature of the water source. Due to the presence of artificial fill associated with development of the 1968 school, the site was identified as having a low potential for buried prehistoric archaeological resources. In addition to the presence of fill, areas of the site containing native soils do not exhibit soil characteristics that are typically associated with buried prehistoric archaeological resources. Despite the low potential of the site to contain cultural resources, historic disturbance such as cutting of native soils, import of artificial fill, and undergrounding of the North Fork San Pedro Creek, as a result of nearby residential development in the 1960's, represents a possibility that disturbed or redeposited archaeological resources could be present onsite.

#### *Sacred Lands Inventory and Tribal Outreach*

The Sacred Lands search conducted by the NAHC returned negative results, however the NAHC provided a list of nine Native American tribes that may have additional information related to Sacred Sites, Tribal Cultural Resources, or other properties of traditional religious and cultural importance located within or near the project site. Of the nine tribes contacted, one response was provided by a representative of Tamien Nation, noting that the project site is outside the aboriginal territory of the tribe.

#### *Field Survey*

A field survey of the site was conducted by walking linear east-west transects, spaced approximately fifteen feet apart. However, due to steep slopes, the northeast portion of the project site was not surveyed. In general, soil visibility was high, with the exception of an area located in the central-southern portion of the project site, which lacked visibility due to the presence of tall, thick fennel and non-native grasses, and the areas along the northeast and southeast portions of the site due to the presence of pine and cypress duff (decaying organic material) and dry logs. A hand trowel was used to inspect soil in low visibility areas. During the site survey, no prehistoric or historic period artifacts, features, or other indications of archaeological resources were observed.

### **4.4.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant

impact to cultural and tribal cultural resources if it would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5
3. Disturb any human remains, including those interred outside of formal cemeteries
4. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Section 21074 of the Public Resources Code as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, including tribal cultural resources that:
  - ♦ Are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)
  - ♦ Are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Section 5024.1(c) of Public Resources Code.

#### **4.4.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

***Impact C/TCUL-1: Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 (less than significant impact).***

A substantial adverse change in the significance of a historical resource would occur if a project would result in physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. As discussed previously, the 1968 school building, 1972 shed building, and associated landscape were evaluated for eligibility for listing on the California Register of Historic Resources. As detailed in the HRE prepared for the project, the school buildings and associated landscape are not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1), are not associated with the lives of persons important in our past (Criterion 2), do not embody the distinctive characteristics of a type, period, region, or method of construction, nor represent the work of an important creative individual, or possesses high artistic values (Criterion 3), and have not yielded, nor are they likely to yield, information

important in prehistory or history (Criterion 4). Since the 1968 school building, 1972 shed building, and associated landscape are not considered historical resources under CEQA, they do not meet any of the four eligibility criteria for listing on the CRHR. Therefore, demolition of the existing buildings and alteration of the associated landscape would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 and impacts would be less than significant.

***Impact C/TCUL-2: Implementation of the project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (potentially significant impact).***

As discussed previously, no archeological resources were identified onsite during the field survey. Furthermore, a search of available records did not identify cultural resources within the project site as identified in past surveys. Although the records review and onsite surveys yielded negative results and concluded that there is a low potential to uncover buried archaeological resources, due to historic disturbance of the project site and surrounding area, including removal of native soils, placement of artificial fill, and undergrounding of the North Fork San Pedro Creek, the Cultural Resources Survey prepared for the project identified a possibility that disturbed or redeposited archaeological resources could be present onsite. To avoid inadvertently causing a substantial adverse change in the significance of an archaeological resource the project shall be required to implement **Mitigation Measure C/TCUL-1**, which requires that members of the construction team overseeing or conducting ground-disturbing activities receive a Cultural Resource Awareness Training to become familiar with the types of artifacts that could be encountered during ground disturbing activities and be educated on the proper procedures to follow in the case that subsurface cultural resources are unearthed. In the event that archaeological resources are unearthed, the project shall comply with **Mitigation Measure C/TCUL-2** which requires that, in the event that potential archaeological resources are encountered, all work within 50 feet of the find be halted and redirected until a qualified archaeologist is retained to evaluate the find and provide recommendations, as deemed appropriate. With implementation of C/TCUL-1 and C/TCUL-2, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 and impacts would be less than significant.



***Impact C/TCUL-3: Implementation of the project could potentially cause a significant impact due to disturbance of human remains, including those interred outside of formal cemeteries (potentially significant impact).***

No evidence suggests that human remains have been interred within the boundaries of the project site. However, if human remains are discovered during ground disturbing activities, **Mitigation Measure C/TCUL-3** shall be complied with to avoid potentially significant impacts. Measure C/TCUL-3 requires that all work within 100-feet of the discovery area be immediately halted and secured to prevent further disturbance. The San Mateo County Coroner must be notified immediately if such a discovery is made, and if the Coroner determines that the discovered remains are of Native American descent, the Native American Heritage Commission shall be contacted immediately. An archaeologist shall also be retained to evaluate the historical significance of the discovery, the potential for additional remains, and to provide further recommendations for treatment of the site. Implementation of measure C/TCUL-3 as well as compliance with requirements identified in the California Health and Safety Code, as required by state law, will ensure that in the event of accidental discovery of human remains, including those interred outside of formal cemeteries will be less than significant.

***Impact C/TCUL-4: Implementation of the project could cause a substantial adverse change in the significance of a tribal cultural resource, including resources that are listed or eligible for listing in the CRHR, or in a local register of historical resources, or that are determined by the City of Pacifica to be significant pursuant to criteria set forth in Section 5024.1(c) of Public Resources Code (potentially significant impact).***

As discussed previously, a search of the Sacred Lands file was conducted and did not indicate the presence of a Native American Sacred Site within or in the immediate vicinity of the project site. Furthermore, no responses from tribes affiliated with the area were received in response to notification. Nonetheless, as described above, the project is subject to **Mitigation Measures C/TCUL-1 and C/TCUL-2**, which would provide for the protection of tribal cultural resources, if encountered onsite during construction activities. Therefore, with mitigation the project would have a less than significant impacts on a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

The City of Pacifica has not identified tribal cultural resources on or within the vicinity of the project site nor were such resources identified as part of the Cultural Resources Survey prepared by Evans & De Shazo on December 30, 2021. No tribes have requested consultation

pursuant to AB 52. Although no tribal cultural resources were encountered during the field survey conducted onsite, there remains a potential that tribal cultural resources may be identified during site development. As such, development within the project site has the potential to result in impacts to tribal cultural resources if encountered during construction. Implementation of **Mitigation Measure C/TCUL-1** and **Mitigation Measure C/TCUL-2** will be required, and will ensure that, in the event of accidental discovery impacts resulting from an adverse change in the significance of a tribal cultural resource will be less than significant.

### ***Mitigation Measures***

**C/TCUL-1:** Prior to commencement of ground-disturbing activities, project supervisors, equipment operators, and other members of the construction team overseeing or conducting ground-disturbing activities shall receive one or more preconstruction Cultural Awareness Trainings by a Secretary of Interior-qualified archaeologist. The Training(s) shall educate and familiarize supervisors, contractors, and equipment operators with the potential to encounter archaeological resources, the types of archaeological material that could be encountered, and procedures to follow if archaeological deposits and/or artifacts are encountered during construction.

**C/TCUL-2:** In the event that an archaeological deposit is encountered during ground-disturbing activities, all work within 50-feet of the discovery shall be redirected until a Secretary of Interior-qualified archaeologist is retained to inspect the material and provide recommendations for appropriate treatment of the resource pursuant to regulations and guidelines set forth in the California Environmental Quality Act, including the involvement of Native American monitors if a prehistoric archaeological resource is identified. If avoidance of the archaeological resource is not feasible, the archaeological resource shall be evaluated for its eligibility for listing in the California Register of Historic Resources. In the event that archaeological resources are identified as eligible for listing on the CRHR, recommendations for proper treatment and handling shall be identified by the qualified archaeologist including, but not be limited to, avoidance or excavation in accordance with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation, which may include data recovery using standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; preparation of a report detailing the methods, findings, and significance of the archaeological site

and associated materials; and accessioning of archaeological materials and a technical data recovery report at a curation facility. Upon completion of the assessment, the archaeologist shall prepare a report to document the methods and results of the assessment. The report shall be submitted to the project applicant and the Northwest Information Center.

**C/TCUL-3:** In the event that human remains are encountered during ground-disturbing activities, all work must stop within 100-feet of the discovery area, the area shall be secured to prevent further disturbance, and the San Mateo County Coroner shall be notified immediately. The Coroner will determine if the remains are precontact period Native American remains or of modern origin, and if any further investigation by the coroner is warranted. If the remains are believed to be precontact period Native American, the Coroner shall contact the Native American Heritage Commission by telephone within 24-hours. The NAHC will immediately notify the person believed to be the most likely descendant (MLD) of the remains. The MLD has 48-hours to make recommendations to the landowner for treatment or disposition of the human remains. If the MLD does not make recommendations within 48-hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC. An archaeologist should also be retained to evaluate the historical significance of the discovery, the potential for additional remains, and to provide further recommendations for treatment of the site in coordination with the MLD.

#### 4.4.5 APPENDICES

- Appendix 4.4-A: Historic Resource Evaluation for the Proposed Pacifica School District Workforce Housing Project, prepared by Evans & De Shazo, December 30, 2021.
- Appendix 4.4-B: Cultural Resources Evaluation for the Proposed Pacifica School District Workforce Housing Project, prepared by Evans & De Shazo, December 30, 2021 (CONFIDENTIAL).

#### 4.4.6 REFERENCES

1. City of Pacifica Municipal Code
  - a. Title 9, Chapter 7: Historic Preservation

2. State of California Tribal Consultation Guidelines, Supplement to General Plan Guidelines, prepared by the Governor's Office of Planning and Research, November 14, 2005
3. National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, U.S. Department of the Interior, National Park Service, 1990



## 4.5 GEOLOGY AND SOILS

This section summarizes the regulatory framework for evaluating geology and soils, the existing site setting, and discusses the potential impacts resulting from implementation of the proposed project. The following documents were used to analyze the potential impacts that could occur:

- Geotechnical Investigation, prepared by Rockridge Geotechnical, August 20, 2020.
- Summary of Existing Geotechnical and Geologic Information – Letter Report (Report), prepared by Slate Geotechnical Consultants, February 21, 2020.

### 4.5.1 REGULATORY CONTEXT

#### ***Federal***

##### *Earthquake Hazards Reduction Act*

Congress passed the Earthquake Hazards Reduction Act in 1977 to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program. This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act, which refined the description of agency responsibilities, program goals, and objectives.

##### *Paleontological Resources Preservation Act*

The Federal Paleontological Resources Preservation Act of 2002 codifies the generally accepted practice of limited vertebrate fossil collection and limited collection of other rare and scientifically significant fossils by qualified researchers. Researchers must obtain a permit from the appropriate state or federal agency and agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers.

#### ***State***

##### *Alquist-Priolo Earthquake Fault Zoning Act and Seismic Hazards Mapping Act*

The Alquist-Priolo Earthquake Fault Zoning Act (Pub. Res. Code Division 2, Chapter 7.5, commencing with Section 2621) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface

trace of active faults. The legislation only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

The Seismic Hazards Mapping Act (Pub. Res. Code Division 2, Chapter 7.8, commencing with Section 2690) was passed in 1990 and requires the State Geologist to designate Seismic Hazard Zones. These zones assist cities and counties in fulfilling their responsibilities for protecting the public from the effects of non-surface fault rupture earthquake hazards such as strong ground shaking, earthquake-induced landslides, liquefaction, or other ground failures. The California Geological Survey has issued a map showing both Alquist-Priolo Earthquake Fault Zones and Seismic Hazards Zones for the Montara Mountain Quadrangle, which encompasses Pacifica.

#### *California and Uniform Building Codes*

The California Building Standards Code (California Code of Regulations (CCR), Title 24) is the compilation of building codes adopted by the State. Title 24 incorporates the International Building Code, prepared as a widely accepted model building code by the International Code Council (ICC), and including necessary California amendments. The purpose of the California Building Code is to establish minimum requirements to safeguard public health, safety, and general welfare, including standards for safety to life and property from fire and other hazards attributed to the built environment. The California amendments include standards for seismic design.

#### *California Public Resources Code*

Section 5097 of the Public Resources Code specifies the procedures to be followed in the event of the unexpected discovery of paleontological resources. Section 5097.5 of the Code states that no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other paleontological feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.

### **Local**

#### *2021 Multijurisdictional Local Hazard Mitigation Plan*

The San Mateo County Department of Emergency Management has issued the 2021 Multijurisdictional Local Hazard Mitigation Plan (LHMP), a regional and cross-jurisdictional effort to plan for reducing risk from natural and man-made disasters. The LHMP assesses hazard vulnerabilities and identifies mitigation actions to reduce injury, property damage,



and community disruption from hazards including flooding, drought, wildfire, landslides, severe weather, terrorism, cyber threats, pandemic, and the impact of climate change on hazards, as well as other hazards. Part 2, Chapter 10 of the LHMP provides an overview of earthquakes and earthquake-related hazards, past seismic events in San Mateo County, and discusses the likely frequency and severity of future seismic events. This Chapter also identifies populations, properties, and facilities most vulnerable to seismic events and associated hazards, ways to ensure there is no increase in exposure in areas of high seismic risk resulting from future development, and discusses a likely future seismic scenario and risks associated with such an event. Appendix E of the LHMP includes detailed risk assessments for each incorporated jurisdiction, including Pacifica, and unincorporated county areas related to exposure, economic impact, and social vulnerability for various seismic scenarios.

#### *City of Pacifica General Plan 1980*

The Pacifica General Plan includes the following relevant policies and actions for reducing and avoiding impacts associated with geologic hazards:

- Seismic Safety and Safety Element
  - ♦ Prohibit development in hazardous areas, including flood zones, unless detailed site investigations ensure that risks can be reduced to acceptable levels and the structure will be protected for its design life. Development shall be designed to withstand a minimum of a 100-year hazard event, regardless of the specific nature of the hazard. This concept applies to both on-site and off-site hazards.
  - ♦ Enforce and monitor ordinances requiring geotechnical site investigation for any site with an average slope exceeding 15% prior to allowing site development. Require geotechnical studies for sites with slopes less than 15% if appropriate. The impacts of increased water runoff from proposed development should be determined as part of the geotechnical study prior to site approval.
  - ♦ Geotechnical studies should include at least a preliminary study of expansive and creeping soils, as well as appropriate analysis of erosion, seismic, tsunami, and other geotechnical hazards.
  - ♦ Require geotechnical reports to be prepared and reviewed by registered geologists, registered engineering geologists, or registered soils engineers.

#### **4.5.2 ENVIRONMENTAL SETTING**

The following environmental setting includes general information related to geologic hazards in Pacifica as well as site-specific information contained in the Geotechnical Investigation prepared by Rockridge Geotechnical and dated August 20, 2020 (Appendix 4.5-A). The investigation included a review of available geotechnical and geologic information

for the site, including previously prepared Geotechnical Investigations, subsurface explorations including test borings and cone penetration tests (CPTs), and engineering analyses which were used to develop conclusions and recommendations for construction of the proposed project at the site.

### ***Regional and Site Geology***

The San Francisco Peninsula is characterized by the Santa Cruz Mountains, a prominent landform extending through San Mateo County, comprising predominantly Franciscan Complex rocks of the Jurassic and Cretaceous age. Steep slopes above Pacifica were formed by uplift of fault interactions and subsequent erosion from heavy winter storms. Eroded materials were deposited onto the gently sloping valley floors and shoreline and created the accumulation of interlayered alluvial slope and ravine debris fans, marine terraces, and localized beach sand deposits.

The site is located on the valley floor of the coastal mountain uplands, which comprises much of the Park Pacifica area of the city. The southeastern edge of the site lies at the toe of a steep hillside with a 2:1 (horizontal to vertical) inclination. As indicated in a 1998 geology map, the site is underlain by artificial fill overlying Holocene-age alluvial fan and fluvial deposits which accumulated from the eroding of steep mountainsides. Artificial fill was placed from earlier grading and development on the site associated with construction of the now-vacant school complex. Based on review of available aerial imagery of the site and surrounding area, the Geotechnical Investigation found that significant development occurred at and around the site after 1946. At that time, the site was undeveloped and there was a well-developed alluvial slope and ravine debris fan in the area that is now Yosemite Drive. Development of the site occurred from approximately 1966 to 1969 with construction of the now-vacant school complex. East of the site, construction and grading activities associated with development of Frontierland Park occurred from 1966 to 1981 and included construction of hillside bench and v-ditch drainage systems. Following development of this area, aerial imagery from 1983 indicates a debris flow landslide scar at the upper playing field of Frontierland Park, however, review conducted for the project indicates slopes above the project site are heavily vegetated and show no evidence of erosional scars or other indications of slope instability.

### ***Subsurface Conditions***

To determine subsurface conditions of the site as part of the Geotechnical Investigation, six borings and nine cone penetration tests were taken from the site. Fill consisting of loose to

very dense gravels and sands with varying amounts of clay was estimated to extend as deep as approximately 35 feet below ground surface (bgs). Native alluvium that underlays the fill consists of stiff sandy clay and medium dense to very dense clayey gravel with sand. This alluvium was encountered at the maximum explored depths of 31.5 feet bgs in borings and 50 feet bgs in cone penetration tests. The bedrock below the alluvium was encountered at depths ranging from 25 to 42 feet bgs and comprises sandstone with low hardness.

Groundwater was encountered during test borings at 20 to 25 feet bgs as well as cone penetration tests at 18 to 23 feet bgs. In one CPT (CPT-5), located southeast of the proposed Building B3, groundwater was encountered at 14 feet bgs. Due to the very stiff fine-grained layer between depths of 14 and 15 feet bgs, the Report notes that groundwater at this location may not represent stabilized groundwater levels and could be the result of varying annual rainfall amounts. The Report concludes that a design groundwater level of 15 feet bgs is appropriate for the project and was used in the analysis to identify liquefaction potential and associated geotechnical recommendations.

### ***Seismic Hazards***

#### *Earthquakes*

The measure of energy released by an earthquake is known as magnitude. The most common expression of magnitude is a rating on the moment magnitude scale ( $M_w$ ), which is based on the earthquake's total moment release derived from the product of distance a fault moved and necessary force to cause the seismic event. Researchers have estimated that there is a 72 percent chance of at least one earthquake of  $M_w$  6.7 or greater that will occur in the greater San Francisco Bay Area over a 30-year period (2014-2044). As stated in the Geotechnical Investigation, the highest probability areas are sections of the Hayward Fault (25 percent), Calaveras Fault (21 percent), and North San Andreas Fault (17 percent). As noted in the 2021 Multijurisdictional LHMP, recent seismic events with a 5.0 or greater magnitude within 100 miles of San Mateo County include earthquakes that occurred northwest of Napa in 2014 (6.0), northeast of San Jose in 2007 (5.6), west of Portola in 2001 (5.5), northwest of Napa in 2000 (5.17), and northeast of Santa Cruz in 1989 (7.1). The Geotechnical Investigation lists active faults within a 50 kilometer (31 mile) radius of the site. The closest segments on the San Andreas Fault are located approximately 2.4 miles from the site and are estimated with characteristic moment magnitude up to 8.04.

The effect of an earthquake on the surface is known as intensity. The Modified Mercalli Intensity (MMI) Scale is the method used to classify earthquake intensity in the United States.

The MMI Scale was developed in 1931 by American seismologists Harry Wood and Frank Neumann and provides an assignment of earthquake intensity based on effects experienced, including perception and impacts to structures. It does not have a mathematical basis, rather it is a ranking based on observed effects. The lowest intensity, MMI I, categorizes shaking that is not felt except by very few under especially favorable conditions. The highest intensity, MMI X, categorizes shaking that is extreme and the level of damage includes destruction of well-built wooden structures and most masonry and frame structures<sup>1</sup>. Per the United States Geological Survey (USGS), the MMI Scale can provide a more meaningful measure of severity to the nonscientist rather than magnitude because intensity refers to effects experienced.

Formation of mountains and generation of earthquakes are results of movement between tectonic plates that form the shell of the earth's crust. California's seismic activity is a result of the movement between the Pacific Plate (west of the San Andreas Fault) and the North American Plate (east of the San Andreas Fault). Major active faults impacting the City of Pacifica include the San Andreas, San Gregorio, and Hayward faults. The site is located approximately 2.4 miles west of the San Andreas Fault, 3.8 miles east of the San Gregorio Fault, and 33 miles west of the Hayward Fault which is located across the San Francisco Bay (Figure 4.5-1). Research conducted as part of the Geotechnical Investigation found that four major earthquakes since the 1800s have been recorded on the North San Andreas fault which were estimated to be equal to or greater than MMI VII. Due to the site's location in the seismically active region and in proximity to faults, the Geotechnical Investigation analyzed the potential for earthquake-induced geologic hazards including ground shaking, surface rupture, liquefaction, lateral spreading, and landslides.

#### *Ground shaking*

Ground shaking on the site would result from seismic activity at the San Andreas, San Gregorio, and Hayward faults. Shaking intensity at the site will depend on the characteristics of the generating fault, distance to the earthquake epicenter, and magnitude and duration of the earthquake. Strong to very strong ground shaking could be felt at the site during a large earthquake from one of the nearby faults.

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<sup>1</sup> USGS. Modified Mercalli Intensity Scale. <https://www.usgs.gov/programs/earthquake-hazards/modified-mercalli-intensity-scale>. Accessed January 11, 2021

### *Surface Rupture*

Surface rupture breaks through to the surface of the Earth because of movement along a fault and according to the California Geological Survey (CGS), almost always follows a pre-existing fault line. Surface rupture may occur suddenly during an earthquake or slowly through fault creep. Where an active fault exists, there is potential for surface fault rupture. Alquist-Priolo Earthquake Fault Zones are regulatory areas around surface traces of active faults where limitations are imposed on placing structures over faults and structures are generally required to be set back at least 50 feet from a fault. The project site is not located in an Alquist-Priolo Earthquake Fault Zone.

### *Liquefaction*

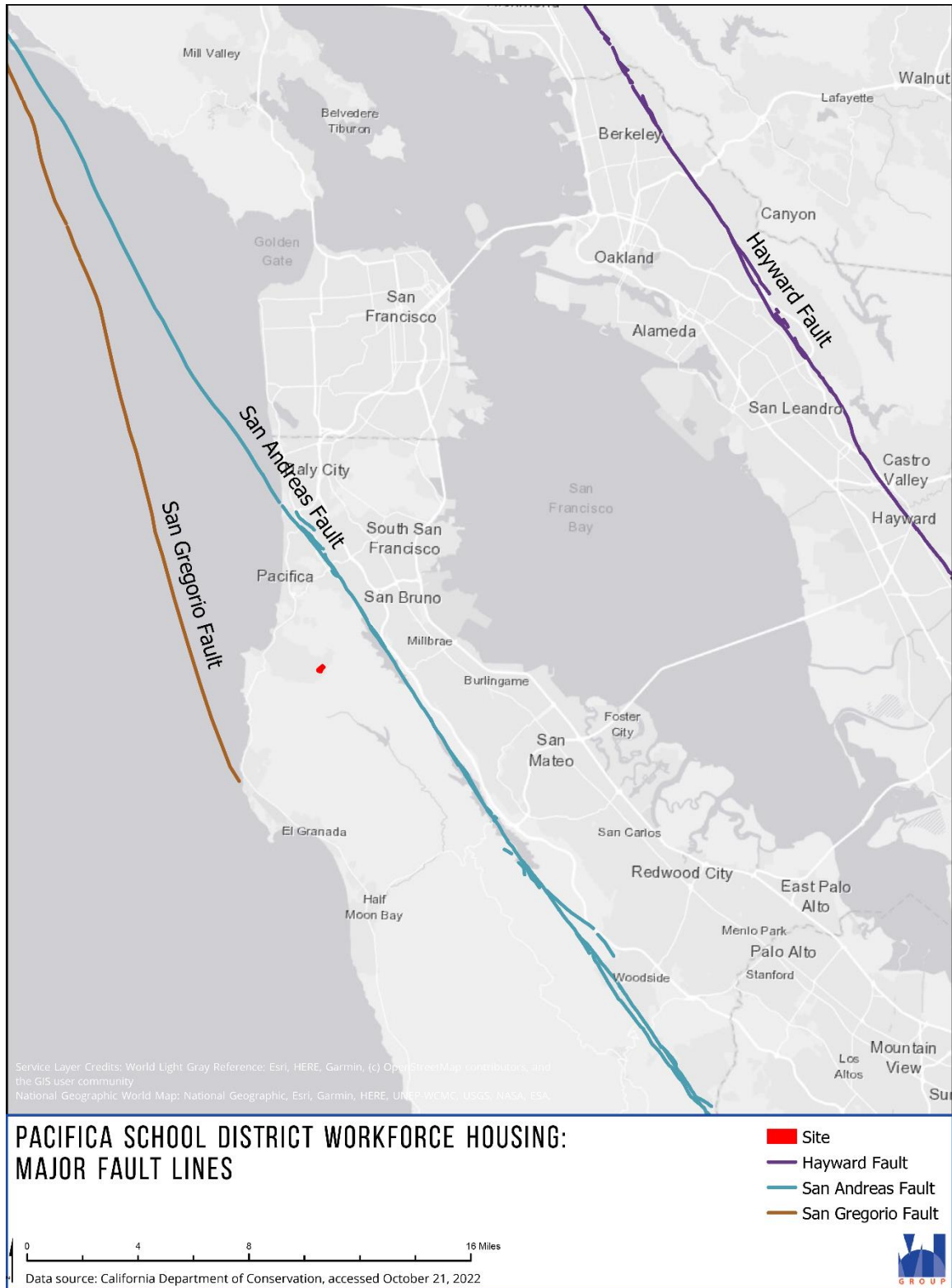
Liquefaction is a phenomenon involving loose, saturated, cohesionless soil that experiences temporary loss of strength during cyclic loading, such as from strong ground shaking during earthquakes. Soil with loose to medium dense sand and gravel, low-plasticity silt, and low plasticity clay deposits are susceptible to liquefaction. The effects of liquefaction include lateral spreading, differential settlement, and loss of bearing strength.

### *Lateral Spreading*

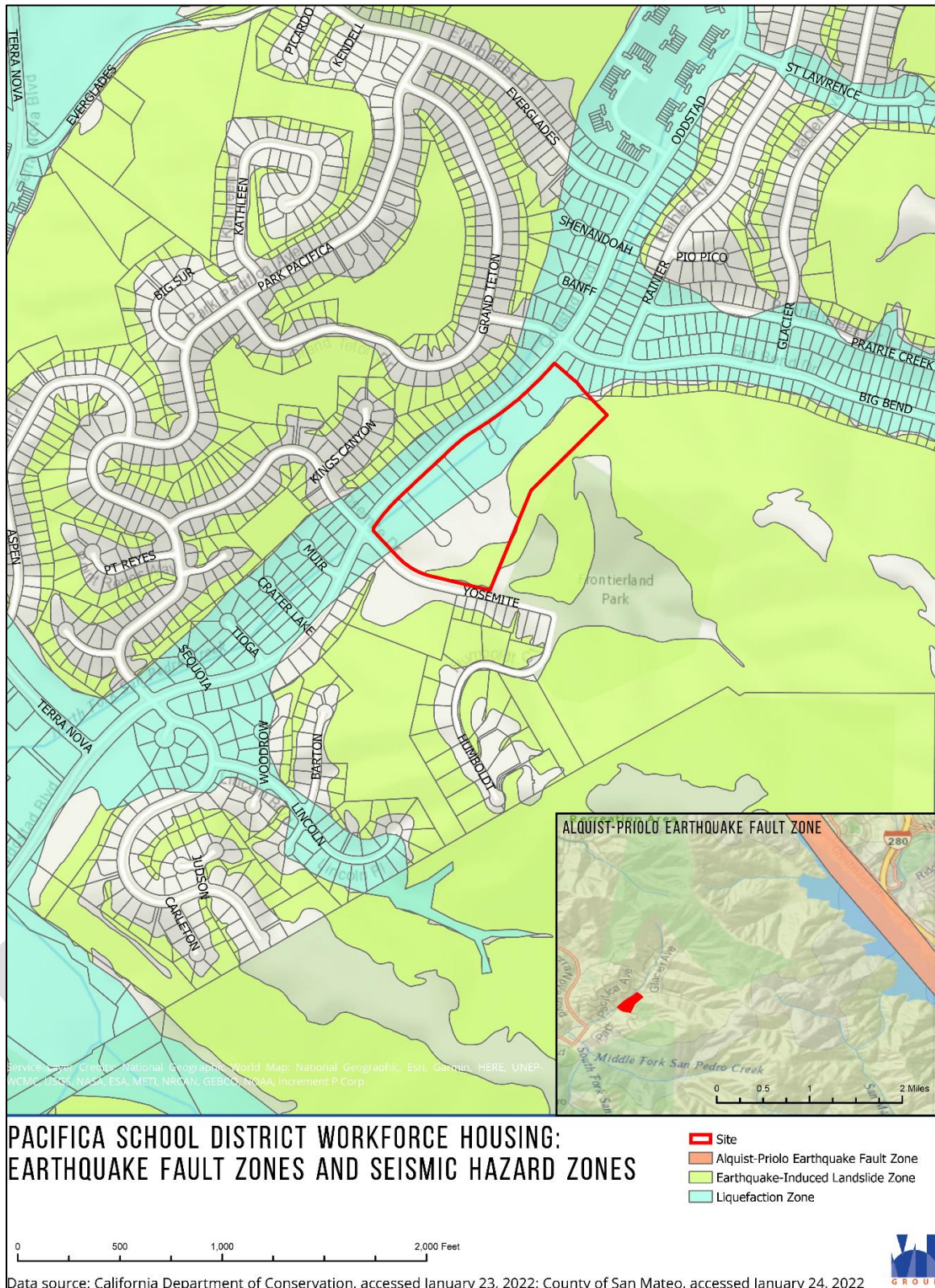
Lateral spreading is a phenomenon where surficial soil is laterally displaced by riding along an underlying liquefied layer in a downslope direction or toward a free face, such as a channel bank. The site does not exhibit a significant downslope nor free faces. Some non-liquefiable soils on site overlay potentially liquefiable soil layers. The non-liquefiable soil is of sufficient thickness such that potential manifestations of liquefaction are very low. The potentially liquefiable layers are discontinuous, which results in no potential for lateral spreading.

### *Landslides*

Landslides may be triggered by earthquakes causing earth and debris flow along slopes. The site is located at the toe, or bottom, of a slope, however, proposed development occurs on a relatively flat portion of the site. Development occurring near the toe of the slope includes grading and installation of new retaining walls along a portion of the southeastern site area. Retaining walls would be designed to resist the lateral earth pressure of the retained soil, as well as surcharge pressure from nearby vehicles. The Geotechnical Investigation found no further evidence of significant instability from adjacent slopes that could impact the project site.

**FIGURE 4.5-1: FAULTS**



**FIGURE 4.5-2: EARTHQUAKE FAULT ZONES AND SEISMIC HAZARD ZONES**



### 4.5.3 THRESHOLDS OF SIGNIFICANCE

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant impact related to geology and soils if it would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### 4.5.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

***Impact GEO-1: The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, or seismic-related ground failure including liquefaction and landslides (potentially significant impact).***

#### *Fault Rupture*

The Project site is not located in an Alquist-Priolo Earthquake Fault Zone, nor are there any known active or potentially active faults that traverse the site. The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 2.4 miles from the site (see Figure 4.5-2). Active faults are those that have ruptured to the surface in the past 11,000 years. In a seismically active area, there is a possibility of future faulting where there were previously no faults. However, the risk of surface faulting and consequential ground failure from

previously unknown faults on the project site was determined to be very low as noted in the Geotechnical Investigation. According to the California Department of Conservation, surface rupture almost always follows a pre-existing fault. Given that the site is not within an Alquist-Priolo Earthquake Fault Zone, there are no known active faults on site, and there is a very low risk of unknown faults being located on the site, the project would result in less than significant impacts due to fault rupture that could result in the risk of loss, injury, or death.

#### *Strong Seismic Ground Shaking*

The project site, as with Pacifica and the larger Bay Area, is in a region of high seismicity. People and structures are expected to experience strong seismic ground shaking due to the site's proximity to the San Andreas, San Gregorio, and Hayward faults. As described in the 2021 Multijurisdictional Local Hazard Mitigation Plan, the site is located in an area estimated to experience seismic events reaching a Modified Mercalli Intensity Scale VIII (Severe/Moderate-Heavy) as a result of seismic events generated from the San Andreas and San Gregorio faults. The Geotechnical Investigation provides recommendations related to building foundations and treatment of fill to account for geologic conditions of the site to minimize impacts from seismic hazards, including ground-shaking. Further, proposed construction will be reviewed for conformance with structural design standards required under the California Building Standards Code. To address potential impacts of strong seismic ground shaking, the project shall be required to comply with **Mitigation Measure GEO-1**, which requires implementation of the recommendations set forth in the Geotechnical Investigation. Among others, the report recommends that the proposed residential, amenity, and accessory structures be supported on an interconnected continuous spread footing or mat foundation and that fill be compacted, moisture-conditioned, and prepared to specifications. With implementation of measure GEO-1 as well as compliance with building code regulations addressing seismic hazards, impacts related to seismic shaking will be less than significant.

#### *Seismic-related Ground Failure (Liquefaction)*

The California Geological Survey indicated that the site is within an area classified as a liquefaction zone, as shown in Figure 4.5-2. This liquefaction zone is an area where historical occurrence of liquefaction, or local geological, geotechnical, and ground water conditions indicate a potential for permanent ground displacements such that measures to reduce seismic risk to acceptable levels would be required. California Geological Survey Special Publication 117 provides recommendations on conducting investigations in mapped liquefaction hazard zones, including guidelines on use of cone penetration tests.

Seismically induced ground failure, including liquefaction can occur during strong earthquakes, which could potentially expose people and property to risk of loss, injury, or death. Liquefaction is the rapid transformation of saturated, loosely packed, fine-grained sediment to a fluid like state as a result of ground shaking. As noted previously, the site is mapped within a zone of liquefaction potential on the CGS Seismic Hazards Program: Liquefaction Zones map. As such, consistent with CGS recommendations for evaluating seismic hazards for sites located within hazard zones, the Geotechnical Investigation included nine CPTs to document subsurface conditions and evaluate the potential for liquefaction to occur at the site. Results of the liquefaction analysis conducted using CPTs collected throughout the project site found non-liquefiable soils overlying potentially liquefiable soils which were generally less than four-feet thick. Given the thickness of non-liquefiable soils over the thin, potentially liquefiable soils, the Geotechnical Investigation concluded that impacts of liquefaction at the surface, such as sand boils and the loss of bearing capacity for shallow foundations would be very low. Additionally, results of the subsurface investigation found that liquefiable soil layers are discontinuous, and therefore concluded that there is no potential for lateral spreading resulting from liquefaction and impacts would be less than significant.

#### *Seismic-related Ground Failure (Landslides)*

As stated in the Geotechnical Investigation, the site is mostly flat, with the exception of the eastern portion of the lot, which will be preserved in the existing state as part of the project. As shown in Figure 4.5-2, the heavily sloped eastern portion of the site is mapped as an Earthquake-Induced Landslide Zone, which is identified as an area where previous landslides have occurred, or where local, topographic, geologic, geotechnical, and subsurface water conditions may indicate a potential for permanent ground displacements.

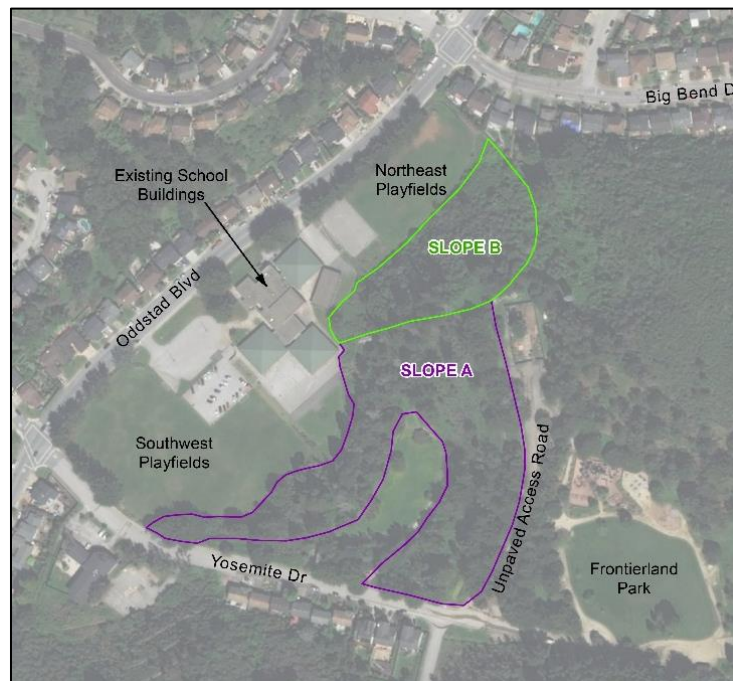
To evaluate the potential for landslide hazards at the site, the Geotechnical Investigation prepared by Rockridge Geotechnical included a review of relevant historical documents related to past landslides, site reconnaissance, review of aerial photography, and review of geotechnical and geological reports previously prepared by Slate Geotechnical Consultants for the project site. Prior studies prepared by Slate Geotechnical Consultants for the site include a Summary of Existing Geotechnical and Geological Information, prepared on February 21, 2020, and a Limited Geologic Study of Hillslopes prepared April 22, 2019 (Appendix 4.5-B). The study of hillslopes identified two areas of potential concern, referred to as Slope A, located adjacent to the southwestern recreational field that will be preserved as part of the project, and Slope B, located adjacent to the northeastern recreational field

and area of planned residential development as further described below.

As shown in Figure 4.5-3, Slope A is located east of the southwest recreational field that will be preserved as part of the project and extends from Yosemite Drive north to one of the school buildings. East of the project site, Slope A extends from the recreational field to an unpaved access road at Frontierland Park. As noted in the Limited Geologic Study of Hillslopes, this area has been heavily modified over time and includes several terraced areas and surficial drainage features as well as approximately 39,000 square feet of level terraced area. Up- and down-slope of the level terrace, the area consist of regularly-sloped ground surface, broken up by surficial drainage features including concrete ditches and gutters. Though it is clear this area has been modified, the presence of fill and compacted soils is unknown.

Slope B extends the length of the northeastern recreational field, approximately 500 feet, and east of the site approximately 200 feet. This area is characterized by a steep, relatively consistent grade. Review of historic aerial photographs does not indicate evidence of slope disturbance. A 12-inch-wide by 6-inch-deep concrete gutter is located at the base of the slope and contained debris and rock fragments at the time of site observations.

**FIGURE 4.5-3: SLOPES A AND B<sup>2</sup>**



<sup>2</sup> Summary of Existing Geotechnical and Geologic Information – Letter Report (Report), prepared by Slate Geotechnical

Historic landslide maps indicate the nearest landslides occurred north of the site in an area that is now development as single-family residences along Big Bend Drive. In addition to mapped historical landslides, a map of debris flow probability prepared for San Mateo County indicates that the hillsides upslope of the project site have a low probability (10 percent) of debris flow occurrence during a major rain event. In the area of Slope A and Slope B, prior mapping of debris flows following major storms in December 1955 and January 1982 exhibit evidence of debris flow scars with relatively short tracks on the slopes uphill of Frontierland Park, however these features do not extend beyond the park. Additional mapping of the 1982 storms concluded no damaging landslides occurred in the vicinity of Slope A or Slope B or in the hillsides upslope of the proposed project. Storms over the winter of 1997-1998 produced a significant amount of rainfall in the region and led to widespread slope failures of varying scales, however, these storm events did not result in significant landslides or slope failures upslope of the site. Given the proximity of the site to the San Andreas fault, impacts of ground failures, including landslides were analyzed for the 1906 San Francisco and 1989 Loma Prieta earthquakes. Available resources indicate the area immediately surrounding and upslope of the site had no reported ground failures and landslides associated with these major seismic events. Though historical aerial photographs show modification and landscaping of the hillside adjacent to the project site, there is no evidence of major slope failure or landsliding affecting the project site.

Therefore, the investigation did not identify evidence of significant instability on adjacent slopes that could impact the site, and potential slope failure impacting the site was determined to be low. As such, impacts associated with the risk of loss, injury, or death involving landslides at the project site would be less than significant.

### *Conclusion*

In conclusion, potential impacts due to risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, or seismic-related ground failure including liquefaction and landslides would be reduced to less than significant with mitigation.

### ***Impact GEO-2: The proposed project could result in substantial soil erosion or the loss of topsoil (potentially significant impact).***

Preparation for project construction will involve demolition of the existing structures, removal of vegetation and root systems, grading across the generally flat areas of the site

away from slopes, and excavation of the undocumented fill. Development of the project has the potential to result in soil erosion if not properly controlled. Upon completion of construction, the site will consist of surfaces covered by structures, paving, and landscaped areas that do not have potential to result in substantial erosion and loss of topsoil.

Site design recommendations from the Geotechnical Investigation provide guidance for designing water flow and drainage to avoid surface erosion. Surfaces will be sloped to drain to v-ditches that collect and send water to designated outlets and retention basins. Additionally, long-term protection of adjacent slopes from erosion through planting of fast-growing vegetation following completion of construction is recommended. If vegetation is not established prior to the rainy season, slopes would be protected with netting, hay bales, and/or silt fences.

Construction of the project involves demolition and grading, where such ground disturbing activities have the potential to result in soil erosion or the loss of topsoil if not properly controlled. As a new development, the project is subject to the erosion and sediment control requirements set forth in Title 6 (Sanitation and Health), Chapter 12 (Stormwater Management and Discharge Control) of the Pacifica Municipal Code. As provided therein, the project will be required to incorporate erosion, sediment, and pollution prevention BMPs during construction to prevent sediment from reaching the streets or entering the stormdrain system. BMPs may include, but are not limited to installation of fiber rolls, erosion control blankets, silt fences, and gravel bags. Consistent with the City's requirements and as detailed in **Mitigation Measure GEO-2**, upon submittal of construction plans, the project shall demonstrate compliance with stormwater control measures consistent with the City's Municipal Code and the San Mateo Countywide Water Pollution Prevention Program. With implementation of measure GEO-2, potentially significant impacts resulting from erosion and loss of topsoil during construction and at operation will be less than significant.

***Impact GEO-3: The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse (potentially significant impact).***

The Geotechnical Investigation identifies the primary geotechnical concerns at the site, including (1) the presence of 35 feet of fill underlying the site, some of which is undocumented, and (2) the need for proper foundation support for the proposed buildings.

Existing soil conditions have the potential for geologic and soil instability, if not properly



accounted for in site, foundation, and structural design. The project is proposed on a relatively flat portion of the site and would not result in on- or off-site landslides. Furthermore, the 10-foot retaining wall proposed along the eastern property line is designed to resist lateral pressure from the adjacent hillside. Additionally, as described in detail above, the project would not be affected by lateral spreading or liquefaction.

With implementation of the recommendations related to site preparation and grading, foundation design, and other geotechnical recommendations, the Investigation concluded that construction of the proposed project is feasible from a geotechnical standpoint. With implementation of **Mitigation Measure GEO-1**, which requires incorporation of geotechnical recommendations in the project design, impacts resulting from construction of the project on an unstable geologic unit or soils will be less than significant.

***Impact GEO-4: The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (potentially significant impact).***

Characteristics of expansive soils include shrinking and swelling with variations in moisture levels. Expansive soils can cause differential movements that can compromise the structural integrity of foundations, retaining walls, and slab-on-grade improvements. To determine the presence of expansive soils, the Geotechnical Investigation analyzed borings collected at various locations on the site, measuring moisture content, particle-size distribution, resistance value, and corrosivity.

Based on the findings of the analysis, the report concluded that the site contains 35 feet of artificial fill comprised of loose to very dense gravels and sands with varying amounts of clay, underlain by alluvium and sandstone bedrock. To address the presence of expansive soils onsite, the Geotechnical Investigation provides recommendations related to site preparation, treatment of fill, and foundation design. Recommendations include clearance of vegetation and organic topsoil, removal of soil subgrade to a depth of at least eight inches, moisture-conditioning and compaction, and construction of stiffened shallow foundation systems.

The project will be required to implement recommendations identified in the Geotechnical Investigation as detailed in **Mitigation Measure GEO-1**, which would address expansive soils onsite. Additionally, the proposed grading and construction plans will be reviewed through the building permit review process to ensure that the final proposed construction complies with building and engineering standards contained in the California Building Standards



Code. With implementation of measure GEO-1 and compliance with applicable standards, the project will result in less than significant impacts as a result of being located on expansive soils.

***Impact GEO-5: The proposed project will not be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (no impact).***

The project does not include use of septic tanks or alternative wastewater disposal systems and will connect to the City's existing municipal sanitary sewer system through installation of 6-inch sanitary sewer lines and a sewer lateral that will connect to the existing sewer line in Oddstad Boulevard. Since the project does not propose use of septic tanks or alternative wastewater disposal systems, there would be no impacts due to the location of such facilities on soils incapable of supporting their use.

***Impact GEO-6: The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (potentially significant impact).***

The Pacifica General Plan does not identify the presence of any paleontological or unique geological resources within the boundaries of the city. Additionally, a search performed using the University of California Museum of Paleontology's (UCMP) database indicated no previous finds of paleontological resources on or in the immediate vicinity of the project site. Nevertheless, there remains a potential for inadvertent discovery of unique paleontological or geological resources during ground disturbing activities. As such, the project shall comply with **Mitigation Measure GEO-3**, which identifies procedures to be followed in the event of a paleontological discovery. With implementation of measure GEO-3, impacts resulting from direct or indirect destruction of a unique paleontological resource or unique geologic feature would be less than significant.

### ***Mitigation Measures***

**GEO-1:** All applicable recommendations set forth in the Design Level Geotechnical Investigation prepared by Rockridge Geotechnical on August 20, 2020, for the subject property, including, but not limited to recommendations related to grading, drainage, excavation, foundations systems, and compaction specifications shall be implemented. Final grading plan, construction plans, and building plans shall demonstrate that recommendations set forth in the geotechnical reports have been incorporated into the final design of the project and to the satisfaction of the City of Pacifica City Engineer.

**GEO-2:** Upon submittal of grading and drainage plans, the applicant shall demonstrate compliance with applicable requirements of Title 6, Chapter 12 (Stormwater Management and Discharge Control) of the City of Pacifica Municipal Code. Plans shall include identification of appropriate best management practices (BMPs) to prevent the discharge of construction wastes or contaminants from construction materials, tools, equipment, stockpiles, or exposed soil from entering the City storm water system or watercourses. Plans shall also demonstrate compliance with stormwater treatment requirements set forth in NPDES Permit No. CAS612008.

**GEO-3:** In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities, all ground disturbing activities shall halt, and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.

#### **4.5.5 APPENDICES**

- Appendix 4.5-A: Geotechnical Investigation Proposed Pacifica Workforce Housing, 930 Oddstad Boulevard, Pacifica, California, prepared by Rockridge Geotechnical, August 20, 2020.
- Appendix 4.5-B: Summary of Existing Geotechnical and Geologic Information – Letter Report, Oddstad Site Planned Development, Pacifica, California, prepared by Slate Geotechnical Consultants, February 21, 2020.

#### **4.5.6 REFERENCES**

1. California Department of Conservation, Alquist-Priolo Fault Zones
2. County of San Mateo, 2021 Multijurisdictional Local Hazard Mitigation Plan, October 2021
3. United States Geological Survey, The Modified Mercalli Intensity Scale

## 4.6 GREENHOUSE GAS EMISSIONS

This section summarizes the regulatory framework for evaluating greenhouse gas emissions (GHGs), summarizes the existing greenhouse gas setting in Pacifica, and discusses the potential greenhouse gas emissions impacts resulting from implementation of the project.

### 4.6.1 REGULATORY CONTEXT

#### **Federal**

Pursuant to the ruling established by the U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120), the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act (CAA). In October 2012, following the Supreme Court ruling, the U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions. This Final Rule requires annual reporting of emissions and applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines.

In 2012, the U.S. EPA issued a Final Rule establishing the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities. The U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit, pursuant to the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) ruling. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

#### **State**

*California Executive Orders S-3-05 and S-20-06, Assembly Bill 32, Senate Bill 32, Assembly Bill 197*

The goal of Executive Order S-3-05, signed by Governor Arnold Schwarzenegger on June 1, 2005, is to reduce California's GHG emissions to: (1) 2000 levels by 2010, (2) 1990 levels by 2020 and (3) 80% below the 1990 levels by the year 2050.

AB 32, the Global Warming Solutions Act of 2006, created a comprehensive, multi-year program to reduce greenhouse gas emissions in California. AB 32 required the CARB to develop a Scoping Plan that describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first

approved by the CARB in 2008 and must be updated every five years. The First Update to the Climate Change Scoping Plan was approved by the Board on May 22, 2014. This update built upon the 2008 Scoping Plan, identified next steps for climate action in California, and laid the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050<sup>1</sup>.

In 2016, the Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation in AB 197, which provides additional direction for developing the Scoping Plan. The second update to the Scoping Plan (California's 2017 Climate Change Scoping Plan) was published by CARB in November 2017. The 2017 Climate Change Scoping Plan identifies how the State can reach the 2030 climate target to reduce GHG emissions by 40 percent from 1990 levels, as set by Executive Order B-30-15 and codified by SB 32. The 2017 Climate Change Scoping Plan also describes how the State can substantially advance toward the 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels. CARB is currently in the process of developing the 2022 Scoping Plan Update, which will assess progress towards achieving the 2030 goals identified in Senate Bill 32 and will lay a path towards achieve carbon neutrality no later than 2045.

#### *Senate Bill 375*

Senate Bill 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, CARB adopted final regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035 to curb GHGs by reducing urban sprawl and vehicle miles traveled.

#### *California Environmental Quality Act, SB 97*

Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the

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<sup>1</sup> California Air Resources Board, <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan>, accessed March 2022.

analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. To date, a variety of air districts have adopted quantitative significance thresholds for GHGs.

### ***Regional***

#### ***BAAQMD 2017 Clean Air Plan***

The Bay Area Air Quality Management District (BAAQMD) adopted the 2017 CAP on April 19, 2017 to comply with California air quality planning requirements set forth in the California Health & Safety Code. The 2017 CAP includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter (PM), ozone (O<sub>3</sub>), and toxic air contaminants (TACs); to reduce emissions of methane and other “super-greenhouse gases” that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

The 2017 CAP consists of 85 specific control measures targeting a variety of local, regional, and global pollutants. The control measures have been developed for stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Implementation of some of the control measures could involve retrofitting, replacing, or installing new air pollution control equipment, changes in product formulations, or construction of infrastructure to reduce conditions that have the potential to create air quality impacts.

The BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP. In general, a project is considered consistent if: (1) the project supports the primary goals of the CAP, (2) includes control measures; and (3) does not interfere with implementation of the CAP measures.

#### ***BAAQMD 2017 CEQA Air Quality Guidelines***

The purpose of the CEQA Air Quality Guidelines is to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the San Francisco Bay Area Air Basin. The Guidelines contain instructions on how to evaluate, measure, and mitigate air quality impacts generated from land development construction and operation activities. The Guidelines focus on criteria air pollutant, GHG, toxic air contaminant, and odor emissions generated from plans or projects and are intended to help lead agencies navigate through

the CEQA process. The Guidelines for implementation of the Thresholds are for information purposes only to assist local agencies. Recommendations in the Guidelines are advisory and should be followed by local governments at their own discretion.

The most recent version of the CEQA Air Quality Guidelines were published in May 2017 and include revisions made to address the Supreme Court's opinion (*California Building Industry Association v. Bay Area Air Quality Management District*, December 2015)<sup>2</sup>. The May 2017 Guidelines update does not address outdated references, links, analytical methodologies or other technical information that may be in the Guidelines or Thresholds Justification Report. The BAAQMD is currently working to update any outdated information in the Guidelines.

#### *Plan Bay Area 2040: Strategy for a Sustainable Region*<sup>3</sup>

Plan Bay Area 2040 is a state-mandated, integrated long-range transportation and land use plan. As required by Senate Bill 375, all metropolitan regions in California must complete a SCS as part of a Regional Transportation Plan. In the Bay Area, the Metropolitan Transportation Commission (MTC), which is the San Francisco Bay Area metropolitan area's MPO, and the Association of Bay Area Governments (ABAG) are jointly responsible for developing and adopting a SCS that integrates transportation, land use and housing to meet greenhouse gas reduction targets set by the California Air Resources Board (CARB). Plan Bay Area 2040 is a limited and focused update that builds upon the growth pattern and strategies developed in the original Plan Bay Area, adopted in 2013<sup>4</sup>, but with updated planning assumptions that incorporate key economic, demographic and financial trends from the last four years. Plan Bay Area 2040 details the following:

- Describes where and how the region can accommodate 820,000 new projected households and 1.3 million new jobs between now and 2040;
- Details a regional transportation investment strategy given \$303 billion in expected revenues from federal, state, regional and local sources over the next 24 years;

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<sup>2</sup> In March 2012, the Alameda County Superior Court ordered BAAQMD to set aside use of the significance thresholds within the BAAQMD 2010 CEQA Guidelines and cease dissemination until they complete an assessment of the environmental effects of the thresholds in accordance with CEQA. The Court found that the thresholds, themselves, constitute a "project" for which environmental review is required. In August 2013, the First District Court of Appeal reversed the Alameda County Superior Court's decision. The Court held that adoption of the thresholds was not a "project" subject to CEQA because environmental changes that might result from their adoption were too speculative to be considered "reasonably foreseeable" under CEQA. In December 2015, the California Supreme Court reversed the Court of Appeal's decision and remanded the matter back to the appellate court to reconsider the case in light of the Supreme Court's opinion.

<sup>3</sup> Metropolitan Transportation Commission and Association of Bay Area Governments, Plan Bay Area 2040, March, 2017, <http://2040.planbayarea.org/>, last accessed January 14, 2022.

<sup>4</sup> Bay Area's first regional transportation plan to include a Sustainable Communities Strategy and chart a course for reducing per-capita greenhouse gas emissions through the promotion of more compact, mixed-use residential and commercial neighborhoods near transit.

- Complies with Senate Bill 375, California's sustainable communities strategy law, which integrates land use and transportation planning and mandates both a reduction in greenhouse gas emissions from passenger vehicles and the provision of adequate housing for the region's 24-year projected population growth.

### **Local**

#### *City of Pacifica General Plan 1980*

While the City of Pacifica General Plan does not directly address greenhouse gas emissions, as indicated in Section 4.3 Air Quality, it includes goals, policies, and actions to reduce air pollutants and exposure to toxic air containments within the Conservation Element. These policies, as applicable to the project, are described in Section 4.3.

#### *City of Pacifica Climate Action Plan<sup>5</sup>*

In July 2014, the City Council of the City of Pacifica adopted a Climate Action Plan (PCAP). The PCAP was designed to be a blueprint of the community's response to the challenges posed by climate change. In addition to providing goals, the PCAP lists measures to be implemented and actions that the City of Pacifica can take to achieve the goals. The City of Pacifica has committed to reducing total community-wide emissions by 35 percent below 2005 levels by 2020, and 80 percent below 1990 levels by 2050, as listed in Table 4.6-1, below:

**TABLE 4.6-1: CITY OF PACIFICA GHG REDUCTION TARGETS (WITH 2005 BASELINE)**

<b>Year</b>	<b>Projected Business as usual (GHG MTCO<sub>2e</sub>)</b>	<b>Reduction Target Emissions Level</b>	<b>Required Reductions (MTCO<sub>2e</sub>)</b>
2005	183,090	--	--
2020	193,613	119,008	75,604
2050	214,660	31,125	185,535

*MTCO<sub>2e</sub> refers to metric tonnes carbon dioxide equivalents*

The PCAP does not have a specific metric ton GHG threshold for project-level construction or operation, but identifies 15 greenhouse gas reduction measures for implementation to address four emission sources, including energy, transportation and land use, solid waste,

<sup>5</sup> City of Pacifica, Climate Action Plan Implementation Report, October 2017, <https://www.cityofpacific.org/civicax/filebank/blobdownload.aspx?BlobID=13498>, last accessed January 14, 2022



and water.

#### 4.6.2 ENVIRONMENTAL SETTING

GHGs are generated from natural geological and biological processes and through human activities including the combustion of fossil fuels and industrial and agricultural processes. While GHGs are emitted locally they have global implications. Changing climatic conditions pose several potentially adverse impacts including sea level rise, increased risk of wildfires, degraded ecological systems, deteriorated public health, and decreased water supplies. The four main greenhouse gases emitted by human activities at the global scale are as follows:

- *Carbon dioxide (CO<sub>2</sub>)*: Carbon dioxide enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and other biological materials, and also as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.
- *Methane (CH<sub>4</sub>)*: Methane is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices, land use and by the decay of organic waste in municipal solid waste landfills.
- *Nitrous oxide (N<sub>2</sub>O)*: Nitrous oxide is emitted during agricultural, land use, industrial activities, combustion of fossil fuels and solid waste, as well as during treatment of wastewater.
- *Fluorinated gases*: Hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride are synthetic, powerful greenhouse gases that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for stratospheric ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent greenhouse gases, they are sometimes referred to as High Global Warming Potential gases (High GWP gases).

Carbon dioxide is the primary greenhouse gas emitted through human activities. In 2019, CO<sub>2</sub> accounted for about 80 percent of all greenhouse gas emissions from human activities in the United States. Carbon dioxide is naturally present in the atmosphere as part of the Earth's carbon cycle (the natural circulation of carbon among the atmosphere, oceans, soil, plants, and animals). Human activities are altering the carbon cycle both by adding more CO<sub>2</sub> to the atmosphere, and by influencing the ability of natural sinks, like forests and soils, to remove and store CO<sub>2</sub> from the atmosphere. While CO<sub>2</sub> emissions come from a variety of natural sources, human-related emissions are responsible for the increase that has occurred

in the atmosphere since the industrial revolution<sup>6</sup>.

The main sources of CO<sub>2</sub> emissions in the United States are from fossil fuel combustion in transportation, electricity generation, and industrial processes.

#### 4.6.3 THRESHOLDS OF SIGNIFICANCE

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant impact related to greenhouse gas emissions if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

#### 4.6.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

***Impact GHG-1: Implementation of the proposed Pacifica School District Workforce Housing project would not generate greenhouse gas emissions, either directly or indirectly, that would result in a significant impact on the environment (potentially significant impact).***

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. BAAQMD's approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions. If a project would generate GHG emissions above the established threshold, it would be considered to contribute substantially to a cumulative impact and would be considered significant. GHG emissions associated with the project would result from short-term construction activities, as well as ongoing operation of the residential and recreational uses, as further discussed below.

##### *Construction*

GHG emissions associated with construction of the project would primarily result from mobile sources including equipment exhaust, worker, and vendor trips. Neither the City nor

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<sup>6</sup> United States Environmental Protection Agency (EPA), <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>, last accessed January 14, 2022

BAAQMD have an adopted threshold of significance for construction related GHG emissions. Rather, BAAQMD encourages incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable. Best management practices aimed at reducing GHG emissions may include but are not limited to use of alternative fuel (e.g., biodiesel, electric) construction vehicles/equipment comprising at least 15 percent of the fleet; use of at least 10 percent local building materials; and recycling or reuse at least 50 percent of construction waste or demolition materials. The project will be required to implement **Mitigation Measure GHG-1** which requires use of local building materials and reuse and recycling of construction waste or demolition material. With incorporation of measure GHG-1, GHG impacts resulting from construction of the project would be less than significant.

#### *Operational*

Operational GHG impacts of the project would be associated with vehicular traffic from new residents, energy and water use, and solid waste disposal. For land use development projects, including residential projects, the BAAQMD sets forth screening criteria for operational GHG emissions, below which a project would be presumed to result in less than significant impacts resulting from generation of GHG's. As shown in Table 3-1 of the BAAQMD CEQA Guidelines, the operational screening size for low-rise apartments is 78 dwelling units whereas the project proposes 70 dwelling units. The BAAQMD Guidelines also provide that if a project is consistent with an adopted qualified GHG Reduction Strategy, it can be presumed that the project will not have significant GHG emission impact. The project would comply with applicable GHG reduction strategies identified in the PCAP including providing access to bicycle and pedestrian facilities along Oddstad Boulevard and proposing infill development on an underutilized site. Additionally, the project would be constructed in accordance with CALGreen and Title 24 of the Building Code, which requires high efficiency water fixtures and water-efficient irrigation systems. Based on the project's size being less than the BAAQMD screening criteria and compliance with the adopted PCAP, ongoing operational impacts related to GHG emissions resulting from the project would be less than significant.

***Impact GHG-2: Implementation of the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (less than significant impact).***

Development of the proposed project would comply with the PCAP, which includes strategies to meet the state's GHG reduction targets. Strategies particularly relevant to the project

include, infill and revitalization of existing neighborhoods and providing a walkable/bikeable street landscape. The PCAP does not conflict with the stipulations of AB 32, the applicable air quality plan, or any other State or regional plan, policy, or regulation of an agency for the purpose of reducing greenhouse gas emissions. Therefore, implementation of the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

### ***Mitigation Measures***

**GHG-1:** Prior to issuance of a demolition and/or grading permit, a GHG reduction plan shall be prepared and submitted to the City for review and acceptance. The plan shall, at a minimum demonstrate that at least 10% of the total building materials used for the project will be local building materials sourced from the San Francisco Bay Area Region and will reuse/recycle at least 50 percent construction waste and demolition material. In the event that these measures are not feasible, the plan shall identify suitable replacement to achieve equivalent or greater GHG emissions.

#### **4.6.5 REFERENCES**

1. City of Pacifica, Climate Action Plan Implementation Report, October 2017
2. United States Environmental Protection Agency (EPA), Overview of Greenhouse Gases, <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>



## 4.7 HAZARDS AND HAZARDOUS MATERIALS

This section presents the regulatory framework for evaluating the project's potential to result in impacts related to hazards and hazardous materials, summarizes the existing hazards and hazardous materials associated with the site and that may be introduced by the project, and discusses the potential impacts resulting from implementation of the proposed project. The following documents were used to analyze potential impacts that could occur:

- Phase I Environmental Site Assessment, prepared by Strata Environmental Services, Inc., May 2018

### 4.7.1 REGULATORY CONTEXT

#### ***Federal***

Federal agencies charged with regulating hazards and hazardous materials include the United States Environmental Protection Agency (EPA), who is responsible for implementing laws and regulations to ensure safe production, handling, disposal, and transportation of hazardous materials; the Occupational Safety and Health Administration (OSHA), who oversees administration of the Occupational Safety and Health Act; and the U.S. Department of Transportation (DOT), who has regulatory responsibility for transportation of hazardous materials between states as well as to foreign countries.

#### *Resource Conservation and Recovery Act*

The 1976 Federal Resource Conservation and Recovery Act (RCRA) and the 1984 RCRA amendments give authority to the EPA to control and regulate the generation, transportation, treatment, storage, and disposal of hazardous wastes. In addition to regulations for hazardous materials, the RCRA also sets forth regulations for the management of non-hazardous solid wastes. The legislation mandated that hazardous wastes be tracked from the point of generation to their ultimate disposal into the environment and includes requirements for detailed tracking of hazardous materials during transport and permitting of hazardous material handling facilities. The 1984 RCRA amendments provided additional framework for a regulatory program designed to prevent releases from Underground Storage Tanks (USTs) which establishes tank and leak detection standards, including spill and overflow protection devices for new tanks. The tanks must also meet performance standards to ensure that the stored material will not corrode the tanks.

#### *Comprehensive Environmental Response, Compensation, and Liability Act*

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980

(CERCLA), commonly referred to as Superfund, introduced active federal involvement to emergency response, site remediation, and spill prevention. The Act is intended to be comprehensive in both the prevention of, and response to, uncontrolled hazardous substances releases. CERCLA establishes prohibitions and requirements for closed and abandoned hazardous waste sites; liability of persons responsible for releases of hazardous waste at these sites; and a trust fund to provide for cleanup when no responsible party can be identified. The Act includes both short-term removal actions to address releases or threatened releases in the near term, and long-term actions that permanently reduce dangers associated with releases or threats of releases on sites listed on the EPA's National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986 and included changes and additions to the program to reflect EPA's experience in the administration of the Act. Amendments to CERCLA included the following:

- stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites;
- required Superfund actions to consider the standards and requirements found in other State and Federal environmental laws and regulations;
- provided new enforcement authorities and settlement tools;
- increased State involvement in every phase of the Superfund program;
- increased the focus on human health problems posed by hazardous waste sites;
- encouraged greater citizen participation in making decisions on how sites should be cleaned up; and
- increased the size of the trust fund to \$8.5 billion

SARA also required EPA to revise the Hazard Ranking System to address the relative potential of sites listed on the National Priorities List to pose a threat to human health or the environment.

#### *Occupational and Safety Health Act*

The Occupational and Safety Health Act of 1970 was adopted to ensure worker and workplace safety by requiring employers to provide to their employees a place free from recognized health hazards, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, and unsanitary conditions. OSHA is a division of the U.S. Department of Labor that oversees the administration of the act and enforces standards in all 50 states.

#### *Toxic Substances Control Act*

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping, testing requirements, and restrictions relating to chemical



substances and mixtures. The TSCA addresses the production, importation, use, and disposal of specific chemicals, including PCBs, asbestos, radon, and lead-based paint.

#### *Hazardous Materials Transportation Act*

The Hazardous Materials Transportation Act (HMTA) of 1975, as amended, is the basic statute regulating hazardous materials transportation in the United States. The purpose of the law is to provide adequate protection against the risks to life and property inherent in transporting hazardous materials in interstate commerce. This law gives the U.S. DOT and other agencies, such as the California Public Utilities Commission and the California Highway Patrol, the authority to issue and enforce rules and regulations governing the safe transportation of hazardous materials.

#### **State**

State agencies charged with regulating hazards and hazardous materials in the State of California include the California EPA, who is authorized by the USEPA to enforce and implement certain federal hazardous materials laws and regulations; the California Division of Occupational Safety and Health, who is the responsible agency for ensuring workplace safety; the California Department of Transportation (Caltrans), who has primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies; California Highway Patrol, who is responsible for assuring the safe, convenient, and efficient transportation of people and goods on the state highway system; California Public Utilities Commission (CPUC), who oversees railroad and rail crossing safety; and the California Department of Forestry and Fire Protection (CAL FIRE), who provides fire protection services for over 31 million acres of California's privately-owned wildlands, also known as State Responsibility Areas (SRAs).

#### *California Code of Regulations*

The following section includes a discussion of the various titles under the California Code of Regulations (CCR) pertaining to hazards and hazardous materials.

**Title 3** pertains to the application of pesticides and related chemicals. Parties applying regulated substances must continuously evaluate application equipment, weather, treated lands, and all surrounding properties. Title 3 prohibits any application that would:

- Contaminate persons not involved in the application
- Damage non-target crops or animals or any other public or private property
- Contaminate public or private property or create health hazards on said property

**Title 8** establishes Cal OSHA requirements for public and worker protection and includes topics related to materials exposure limits, equipment requirements, protective clothing, hazardous materials, and accident prevention. Title 8 also sets forth construction safety and exposure standards for lead and asbestos as well as fire suppression service standards ranging from fire hose size requirements to the design of emergency access roads.

**Title 14** establishes minimum standards for solid waste handling and disposal and a variety of regulations related to wildfire preparedness, prevention, and response.

**Title 17** establishes regulations for the use and disturbance of materials containing naturally occurring asbestos.

**Title 19** establishes a variety of emergency fire response, fire prevention, construction, and construction materials standards.

**Title 22** sets forth definitions of hazardous and special waste, identifies hazardous waste criteria, and establishes regulations pertaining to the storage, transport, and disposal of hazardous waste. Title 22 was created to regulate hazardous wastes generated by factories or similar sources, however, contaminated soil excavated during construction may also be regulated under this Title.

**Title 26** is a compilation of state regulations pertaining to hazardous materials and waste that are presented in other regulatory sections. Title 26 mandates specific management criteria related to hazardous materials identification, packaging, and disposal. In addition, Title 26 establishes requirements for hazardous materials transport, containment, treatment, and disposal. Staff training standards are also set forth in Title 26.

**Title 27** sets forth a variety of regulations relating to the construction, operation, and maintenance of the state's landfills, and establishes a landfill classification system and categories of waste. Each class of landfill is constructed to contain specific types of waste (household, inert, special, and hazardous).

#### *California Health and Safety Code*

Division 20, Chapter 6.95 of the California Health and Safety Code sets forth the minimum requirements for business emergency plans and chemical inventory reporting. These regulations establish that businesses must provide any required information adopted by the local agency, a site map, emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled onsite. This chapter of the Health and Safety Code establishes

criteria for businesses subject to the requirements including, but not limited to, businesses using hazardous materials at or above the established thresholds.

#### *California Fire Code*

The California Fire Code (CFC) is Part 9 of Title 24, California Code of Regulations, also referred to as the California Building Standards Code. The CFC incorporates the 2018 International Fire Code of the International Code Council with necessary California amendments. The purpose of the CFC is to establish the minimum requirements consistent with nationally recognized best practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations.

#### **Local**

##### *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco Intl. Airport*

California State law requires adoption of an Airport Land Use Compatibility Plan (ALUCP) by the Airport Land Use Commission for each public use and military airport that falls within their jurisdiction. The City of Pacifica and the entirety of San Mateo County are located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO), for which the City/County Association of Governments (C/CAG) of San Mateo County serves as the Airport Land Use Commission. The ALUCPs primary goals include the following:

- Reduce the number of future residents who could be exposed to noise impacts associated with airport operations
- Minimize the number of future residents exposed to other airport-related hazards
- Protect the navigable airspace around the airport to ensure safe and efficient operations
- Establish areas within which aircrafts fly at a frequency and altitude to be perceptible by sensitive receptors, and establish real estate disclosure requirements for these areas

##### *County and Local Emergency Response*

The San Mateo County Department of Emergency Management (DEM) coordinates countywide preparedness, response and protection services and activities for large-scale incidents and disasters. DEM is responsible for alerting and notifying appropriate agencies within the County's 20 cities when disaster strikes; coordinating all agencies that respond; ensuring resources are available and mobilized in times of disaster; developing plans and procedures in response to and recovery from disasters; and developing and providing preparedness materials for residents.

The Pacifica Police Department is responsible for the preparation and maintenance of an operational emergency management plan for all city departments use in managing a major disaster.

#### *2021 Multijurisdictional Local Hazard Mitigation Plan*

The City of Pacifica, in conjunction with the County of San Mateo and other cities and special districts in the County, prepared an update to the Multi-jurisdictional Local Hazard Mitigation Plan, initially developed in 2005 and updated in 2010 and 2016. The Plan identifies local policies and actions intended to reduce the risk to life and property from natural hazards such as flooding, earthquakes, tsunamis, and wildland fires. The Plan also complies with federal planning regulations which require local governments to develop a hazard mitigation plan as a condition for receiving certain types of non-emergency disaster assistance, including funding for hazard mitigation plans. The 2021 update of the San Mateo County Multi-jurisdictional Local Hazard Mitigation Plan was adopted by Pacifica City Council on November 22, 2021.

#### *City of Pacifica General Plan 1980*

The Seismic Safety and Safety Element of the General Plan identifies known hazards in the City of Pacifica including geotechnical hazards associated with hillside erosion, coastal erosion, earthquake and ground shaking, and landslides, and flood and fire hazards. Policies applicable to the proposed project include the following:

- Prohibit development in hazardous areas unless detailed site investigations ensure that risks can be reduced to acceptable levels.
- Prohibit mitigation measures for potential geotechnical hazards if the mitigation measures could adversely affect surrounding public or private property. For example, use of the public right-of-way as a landslide repository could adversely affect public health, safety, and welfare.
- Maintain an emergency plan which provides adequate response to disasters, including emergency ingress and egress communitywide and for individual neighborhoods.
- Emphasize fire prevention measures.
- Geotechnical studies should include at least a preliminary study of expansive and creeping soils, as well as appropriate analysis of erosion, seismic, tsunami, and other geotechnical hazards.

### **4.7.2 ENVIRONMENTAL SETTING**

Prior to the site's development as a school in 1968, the property was vacant. The Oddstad School formerly operated onsite from 1968 to 2005, after which point it was utilized by third

party commercial tenants and various education and non-industrial uses from 2006 to 2019. Since 2019, the existing School building onsite has been utilized as storage by the Pacifica School District.

### ***Phase I Environmental Site Assessment***

In accordance with the guidelines of the American Society of Testing and Materials (ASTM) Standard Practice E1527-13, and the USEPA Standards and Practices for All Appropriate Inquiries (AAI), Strata Environmental Services, Inc. prepared a Phase I Environmental Site Assessment (ESA) for the project site in May 2018 (Appendix 4.7-A). The purpose of the Phase I ESA is to identify the presence or likely presence of any hazardous substances or petroleum products in, on, or at the property, referred to as recognized environmental conditions (REC), that may impact future use of the site. The Phase I ESA also serves to identify controlled recognized environmental conditions (CRECs), which are past releases that have been addressed to the satisfaction of the regulatory authority with hazardous substances or petroleum products permitted to remain in place subject to certain controls, or historical recognized environmental conditions (HRECs), which are similar to CRECs, except that the property is not subject to controls. As noted in the Phase I ESA, RECs do not include de minimis conditions, which are defined as property conditions that do not pose a threat to human health or the environment, and are not subject to enforcement actions by a regulatory agency.

The Phase I ESA analysis is based on a site reconnaissance of the subject property which included an inspection of the interior and exterior of existing structures, property grounds, and operational areas of the property, as well as review of government databases, and interviews with individuals familiar with current and historical use of the property.

#### ***Controlled, Historic, and Recognized Environmental Conditions***

Results of environmental database research indicate three sites containing hazardous or potentially hazardous materials located within one-half mile of the project site including the former Frontierland Park Solid Waste Facility/Landfill which is no longer in operation, a Leaking Underground Storage Tank (LUST) cleanup site at 765 Oddstad Boulevard, and a closed LUST cleanup site at 1055 Terra Nova Boulevard. Based on the non-operational status of the former landfill, and the location of hazardous sites downslope from the project site, no evidence for likely impact to the property exists. As noted in the Phase I ESA, a search of environmental databases found three sites within the vicinity of the project site that warrant discussion as follows:

- **Frontierland Park Landfill.** The former landfill was located along Yosemite and closed in 1972. The Phase I ESA identified no likely risk as there is no indication of environmental impacts to soil or groundwater and the area is now developed as residences.
- **765 Oddstad Boulevard.** This site is identified as a LUST cleanup site, however, the Phase I ESA notes that there are no likely risks as remediation has been conducted and though groundwater monitoring is ongoing, the site is downgradient from the site and as such does not pose a likely risk.
- **1055 Terra Nova Boulevard.** This site is identified as a LUST cleanup site, however remediation is complete and the case was closed in 2002.

The Phase I ESA did not identify RECs, CRECs, or HRECs on the project site. During site surveys conducted by Strata, de minimis quantities of hazardous substances and petroleum products were observed in cabinets and other designated storage areas onsite, however, storage containers were noted to be in good condition and substances were not present in a quantity that would pose a threat to human health or the environment. Furthermore, observations of the site did not indicate signs of historical spills, releases, or environmental damage such as stressed vegetation, discolored or stained soil or pavement, corrosion, or pools of liquid, nor were any above- or below-ground storage tanks present onsite. As such, the assessment concluded that there is no evidence of controlled recognized environmental conditions, historic recognized environmental conditions, or recognized environmental conditions on the project site.

#### *Other Notable Site Conditions*

During site surveys conducted as part of the Phase I ESA, one metal dumpster for general refuse and two plastic waste bins for recycling were observed outside the main school building, however, conditions did not indicate evidence of solid waste disposal that would result in significant contamination from generation or storage of solid or hazardous wastes.

In addition, Strata noted the presence of one pad-mounted transformer, owned and operated by Pacifica Gas and Electric Company (PG&E) which could be a potential source of polychlorinated biphenyls (PCBs). Given the restriction of access by the utility company, observation of labeling was not feasible, however, it was presumed that the transformer could be PCB-contaminated. Strata performed limited observations of the area surrounding the transformer and did not note evidence of fires, spills, weeps, stains, or other indications of oil leakage. Additionally, the interviewed site contact did not report any such incidences associated with the transformer.

Though not required pursuant to ASTM, the Phase I ESA evaluated the site for the presence or likely presence of asbestos-containing materials (ACMs). The inspection was limited to

readily accessible and visible locations of existing structures onsite and did not include disassembly of structures. Site observations indicate ACMs present in floor tiles located throughout the main school building and in insulation materials located in the mechanical room. In addition to observations made during the site survey, an Asbestos Hazard Emergency Response Act Reinspection Report, dated June 29, 1992 noted non-friable ACM present in vinyl floor tiles (30,000 square feet), hot water piping/joint insulation (3 feet of 4-inch and 4 feet of 8-inch), breeching/exhaust packing around the boiler (200 square feet), and transite siding (126 square feet). There is no indication of abatement of these materials and therefore, it is presumed that the existing building contains ACMs.

### ***Airport Hazards***

San Francisco International Airport is located approximately four miles east of Pacifica. As specified in the Comprehensive Airport Land Use Compatibility Plan, all of San Mateo County, including the entirety of Pacifica is located within Airport Influence Area. As noted in the Plan, all portions of San Mateo County are overflown by at least one flight per week to or from San Francisco International Airport at altitudes of 10,000 feet above mean sea level or less. All areas located within AIA A require real estate disclosure in compliance with state law. Portions of the City to the north and northeast of the project site are also located within AIA B, however, the project site is located outside of this area. AIA B includes a combination of noise and safety zones for the airport and provides for discretionary review of projects by the Airport Land Use Commission to ensure consistency with adopted plans and policies.

### ***Wildland Fire Hazards***

Cal Fire maps areas of significant wildfire hazards based on weather, terrain, and fuel types and are designated as either SRA or Local Responsibility Areas (LRA), based on population density, land use, and land ownership. Areas within the City of Pacifica are designated as LRA while small areas of the Planning Area outside City limits are designated as SRA. As shown in Figure 8-7 of the 2040 General Plan, lands owned by the federal government and the County, including the Golden Gate National Recreational Area (GGNRA) lands and San Pedro Valley County Park, are designated as Federal Responsibility Area (FRA) within the Pacifica LRA.

The majority of the Planning Area, including the project site, is located outside of high and very high fire hazard severity zones. High and very high fire hazard severity zones are primarily located adjacent to the south and eastern edges of the City. In addition, the North County Fire Authority (NCFA) establishes areas within the City designated as Wildland/Urban Interface (WUI). The project site is located adjacent to steep, undeveloped hillside and is



designated as WUI. As such, the proposed project is subject to the requirements set forth in the California Fire Code and Chapter 7A of the California Building Code which establishes regulations related to vegetation management, non-combustible materials, and the location of vents, among other requirements, which are intended to increase fire resistance of buildings located within the WUI. Wildland fire hazards are further discussed in Section 4.15 Wildfire.

#### 4.7.3 THRESHOLDS OF SIGNIFICANCE

As provided in Appendix G of the CEQA Guidelines, the proposed project would result in a significant impact related to Hazards and Hazardous Materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
4. Create a significant hazard to the public or the environment as a result of being located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5
5. Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, resulting in a safety hazard or excessive noise for people residing or working in the project area
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

#### 4.7.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

***Impact HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (less than significant impact).***

Site preparation and construction activities would result in the temporary presence of potentially hazardous materials including, but not limited to fuels and lubricants, paints,

solvents, insulation, electrical wiring, and other construction-related materials. Although these potentially hazardous materials may be present onsite during construction, the applicant/contractor is required to comply with all existing federal, state, and local safety regulations governing the transportation, use, handling, storage, and disposal of potentially hazardous materials. Additionally, pursuant to Section 6-12.206 of the Pacifica Municipal Code, construction activities and developments are required to implement Best Management Practices (BMPs) to prevent the discharge of construction wastes or contaminants from entering the storm water system or watercourse. Upon completion of construction, the project, as a residential use, will not include ongoing use or generation of hazardous materials onsite. Through compliance with standard regulations to incorporate BMPs during construction, as well as compliance with federal and state regulations as overseen by San Mateo County's Certified Unified Program Agency (CUPA), impacts to the public or the environment resulting from the routine transport, use, or disposal of hazardous materials during construction and ongoing operation of the proposed project would be less than significant.

***Impact HAZ-2: The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (potentially significant impact).***

Construction of the proposed project includes demolition and removal of existing structures, and improvements onsite. Based on the age of the school building and shed as well as observations made during the site survey conducted as part of the Phase I ESA, ACMs are presumed to be present in existing structures onsite. Disturbance to ACMs during demolition activities has the potential to result in impacts to construction workers or the environment if not properly treated and removed. The ESA recommends a full ACM survey of the building be performed to identify all ACMs and appropriate removal and disposal protocols prior to demolition activities. The preparation of a full survey of ACM and lead-based paint (LBP) materials and establishment of procedures for demolition and disposal of such materials, has been imposed as **Mitigation Measure HAZ-1**. In accordance with measure HAZ-1, demolition and disposal of ACM and LBP material shall be conducted in compliance with all federal, state, and local requirements. Hauling and disposal of demolition debris would be conducted in a manner consistent with waste disposal requirements for all contaminated materials, including materials impacted by asbestos and lead-based paint. Therefore, with implementation of measure HAZ-1, potential impacts resulting from the release of hazardous materials into the environment during construction would be less than significant.

***Impact HAZ-3: The proposed project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (less than significant impact).***

The project would not result in the emission of hazardous materials within a quarter mile of a school. The site is located approximately one-half mile east of Ortega Elementary School and is greater than one-half mile from Terra Nova High School, northwest of the site. Further, the proposed development consists of a residential land use, which is not associated with production, storage, and handling of hazardous materials and waste at operation. Established policies and programs set forth by the EPA, DTSC, CAL/OSHA and other regulatory agencies provide that the presence of potential hazardous materials occur in the safest possible manner by reducing the opportunity for accidental release or spills and ensuring that a response plan is in place. As discussed previously, during construction, hazardous materials such as paints, fuels, solvents, and other construction materials may be present on the site. However, compliance with all existing federal, state, and local safety regulations governing the transportation, use, handling, storage, and disposal of potentially hazardous materials is required during construction and any such materials would be removed from the site following completion of construction activities. There are no activities associated with the proposed project that would pose a threat to schools from the release or handling of hazardous materials. Therefore, impacts related to the emission or handling of hazardous materials within one-quarter mile of a school would be less than significant.

***Impact HAZ-4: The proposed project would not be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (no impact).***

The California EPA annually updates the California Hazardous Waste and Substances Site List, also known as the Cortese List. A search of EnviroStor, performed on February 28, 2022, showed no active cleanup sites at the project site or in its immediate vicinity. A search of Geotracker, performed on February 28, 2022, showed no open LUST Cleanup Sites and no open "Cleanup Program Sites" at the project site or in its immediate vicinity. Furthermore, the Phase I ESA prepared for the project found no evidence of HRECs, CRECs, or RECs on the project site. The project is not listed as a hazardous materials site, and therefore, would not create a significant hazard to the public or the environment as a result of being located on such a site, and construction of the project would have no impact.

***Impact HAZ-5: The proposed project would be located within an airport land use plan, but would not result in a safety hazard or excessive noise for people residing or working in the project area (less than significant impact)***

The site is located approximately four miles from San Francisco International Airport, separated by mountainous terrain and existing development. The project consists of 70 multi-family residential units in buildings located at the toe of a steep slope, which would not exceed the height of existing ridges and would not conflict with height limits and airspace protection policies established in the ALUCP. Furthermore, the site is located outside of AIA B, which provides for discretionary review of projects by the Airport Land Use Commission to ensure consistency with adopted plans and policies. The site is, however, located within AIA A, which requires real estate disclosure for for-sale properties. Since the project proposes to provide the proposed residential units for rent, a real estate disclosure would not be required pursuant to the regulations identified in the Comprehensive Airport Land Use Compatibility Plan for San Francisco International Airport. Furthermore, the site is located more than three miles away from areas within the projected 2020 CNEL noise contour map of the ALUCP, which define areas potentially impacted by aircraft noise where the plan's noise compatibility measures would apply. Therefore, impacts associated with airport-related hazards as a result of being located within an airport land use plan or within two miles of a public airport or public use airport, would be less than significant.

***Impact HAZ-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (less than significant impact)***

The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The North County Fire Authority, which provides fire protection and emergency medical response services in the city has a response time of four to eight minutes for fire response and under seven minutes for emergency medical response. The site is located approximately 1.6 miles from Fire Station 72, which is within the four-minute response time identified by the North County Fire Authority. The project as proposed demonstrates compliance with all local, state, and federal regulations and does not present any conflicts with emergency response actions. The Multi-jurisdictional Hazard Mitigation Plan identifies transportation and accessibility as a vulnerability in the City of Pacifica. As specified therein, State Route 1 (SR 1) is the major roadway connecting neighborhoods within the city and allows for traffic flow in and out of the City. Portions of SR 1 may be susceptible to landslides due to steep grades which could

block through access, limiting evacuation during an emergency, however, the Plan does not identify specific measures for addressing potential impacts caused by erosion to SR-1. Furthermore, the project site provides access to the inland portions of SR-1 via east-west oriented collector and arterial roads which would provide access out of the city in the event of an emergency evacuation. As such, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.

***Impact HAZ-7: The proposed project could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (potentially significant impact).***

Wildland fires are of concern particularly in expansive areas of native vegetation of brush, woodland, and grassland areas. The project site is located in a WUI area and adjacent to an area designation as a moderate fire hazard severity zone within the LRA. As noted in the Vegetation Management Plan Memo prepared for the project (Appendix 4.7-B), the North County Fire Authority identified conditions that could impede access to the site including lack of water and steep slopes. As such, the project is required to maintain a 100-foot defensible zone around all structures. In addition, **Mitigation Measure HAZ-2** shall apply to the project which requires preparation of a site-specific Vegetation Management Plan that complies with the Vegetation Management Plan Memo prepared for the project as well as the Fire Safe San Mateo County Defensible Guidelines. With implementation of a site-specific Vegetation Management Plan as well as use of fire-resistant construction materials as required under the California Building Code for construction within the WUI, impacts related to the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fire will be less than significant.

As previously stated, the North County Fire Authority provides fire protection and medical emergency services in Pacifica. Within Pacifica, the Fire Authority maintains Fire Station 72 at 1100 Linda Mar Boulevard, approximately 1.6 miles from the project site which allows for timely response to the site in the event of a fire. The project would not increase risk of exposure due to wildland fire hazards as it will comply with building code standards, will include creation of defensible space along the eastern portion of the project site, and is within close proximity to fire and emergency services. Furthermore, the site is currently developed, and development under the proposed project will concentrate areas on the flat portions of the site, in substantially the same area as the former Oddstad School. Therefore, impacts related to the exposure of people or structures to a significant risk of loss, injury or

death involving wildland fires will be less than significant.

***Mitigation Measure***

**HAZ-1:** Prior to demolition of the existing structures, an asbestos survey shall be performed by a licensed asbestos inspector to identify all asbestos-containing materials and lead-based paint. The survey shall adhere to sampling protocols outlined by the Asbestos Hazard Emergency Response Act (AHERA) and shall incorporate the findings of the survey into a report to be submitted to the city. In the event that such substances are found, the report shall include appropriate removal and disposal protocols subject to requirements set forth by the Occupational Safety and Health Administration AHERA requirements, lead standard contained in 29 CFR 1910.1025 and 1926.62, and any other local, state, or federal regulations. Treatment, handling, and disposal of these materials shall be performed by qualified professionals in accordance with applicable federal and state regulations, and shall be completed prior to demolition of the existing structures.

**HAZ-2:** Upon submittal of a building permit the applicant shall submit a site-specific Vegetation Management Plan for review and approval by the City of Pacifica and the North County Fire Authority. The Plan shall:

1. Remove all vegetation within the site listed on the San Mateo County list of “Fire Prone (Pyrophytic) Plants” except for isolated specimen plants.
  - a. Existing isolated or newly planted specimens shall meet the vertical and horizontal spacing guidelines.
2. Maintain and plant all trees and shrubs to the specifications identified in ‘Plant and Tree Spacing’, ‘Vertical Spacing’, and ‘Horizontal Spacing’ as outlined in the Plan “Fire Safe Landscaping” guide.
  - a. An evaluation of slope implications shall be reflected when determining the landscape.
  - b. All plantings shall be from the Plan “Firescaping with Native Plants” or otherwise fire resistive plantings.
3. Maintain an ember zone of 5 feet around all buildings pursuant to California Government Code (CGC) 51182 (5)(1), (2) within the Project.
  - a. The ember zone shall be maintained to remove weeds and other combustible materials on a minimum monthly basis.

4. Maintain all landscaping and vegetation on the Project site on a regular basis as part of a regular landscape maintenance program.
  - a. All vegetation shall be irrigated as needed to maintain the vegetation in a healthful condition.

#### **4.7.5 APPENDICES**

- Appendix 4.7-A: Phase I Environmental Site Assessment, prepared by Strata Environmental Services, Inc., May 2018
- Appendix 4.7-B: Vegetation Management Plan Memo, prepared by Richard Johnson, February 28, 2022

#### **4.7.6 REFERENCES**

1. 2021 Multijurisdictional Local Hazard Mitigation Plan Volume 2 Planning Partner Annexes, October 2021
2. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport
3. California Department of Forestry and Fire Protection Fire Hazard Severity Zones Maps
4. California Department of Toxic Substances Control Envirostor, February 28, 2022.
5. California State Water Resources Control Board, February 28, 2022.



## 4.8 HYDROLOGY AND WATER QUALITY

This section summarizes the regulatory framework for evaluating the project's potential to result in impacts related to hydrology and water quality, summarizes the existing regulatory and physical conditions of the site, and discusses the potential impacts resulting from implementation of the proposed project. The following documents were used to analyze potential impacts that could occur from project implementation:

- Hydrology and Hydraulics Technical Memorandum Pacifica School District – Workforce Housing Project 930 Oddstad Boulevard, prepared by BKF Engineers, September 2020
- C.3 Regulated Projects Guide, Version 1.0, San Mateo countywide Water Pollution Prevention Program, prepared by San Mateo County, January 2020

### 4.8.1 REGULATORY CONTEXT

#### ***Federal***

##### *Clean Water Act*

Under the Clean Water Act (CWA) of 1972, the United States Environmental Protection Agency (EPA) seeks to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The statute employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The CWA authorizes the USEPA to implement water quality regulations. The National Pollutant Discharge Elimination System (NPDES) permit program, under Section 402 of the CWA, controls water pollution by regulating soil erosion and stormwater discharges into waters of the United States.

These regulations include requirements that stormwater discharge permits be obtained for construction activities disturbing one acre or more of soil as well as controls for regulating nonpoint source discharges from all construction sites one acre or more in size.

NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs). The San Francisco Regional Water Quality Control Board (SFRWQCB) has jurisdiction over the Bay Area, including the City of Pacifica.

##### *Federal Emergency Management Act*

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP), in which participating agencies must satisfy certain mandated floodplain management criteria. The National Flood Insurance Act of 1968 established a

standard that development should be protected from floodwater damage caused by the Intermediate Regional Flood (IRF). The IRF is defined as a flood that has an average frequency of occurrence once every 100 years. The 1968 Act made federally subsidized flood insurance available to property owners if their communities participate in the NFIP. A community establishes its eligibility to participate by:

- Adopting and enforcing floodplain management measures to regulate new construction; and
- Ensuring that substantial improvements within Special Flood Hazard Areas (SFHA) are designed to eliminate or minimize future flood damage.

A SFHA is an area within a floodplain having a one percent or greater chance of flood occurrence within any given year. SFHAs are delineated on Flood Insurance Rate Maps (FIRMs) issued by FEMA. The Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 1994 make flood insurance mandatory for most properties in SFHAs. The project site is located outside of a Special Flood Hazard Area.

### **State**

#### *Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.), enacted in 1969, provides the legal basis for water quality regulation within California. Any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the State requires a “Report of Waste Discharge”. The Act predates the CWA and regulates discharges to waters of the State. Discharges of “waste” are prohibited and are defined more broadly than the CWA. Discharges under the Porter-Cologne Act are permitted by waste discharge requirements and may be required even when the discharge is permitted or exempt under the CWA.

#### *State Water Resources Control Board*

The SWRCB adjudicates water rights, sets water pollution control policy, issues water board orders on matters of statewide application, and oversees water quality functions throughout the state by approving Basin Plans, Total Maximum Daily Loads (TMDLs), and NPDES permits. In 1992, the SWRCB adopted the General Construction Activity Storm Water Permit (GCASWP) which is required for all construction activities where clearing, grading, and excavation will disturb one acre or more of land. The General Permit requires all dischargers to:

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation;

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP); and
- Perform inspections of stormwater pollution prevention measures (control practices).

The Construction General Permit authorizes the discharge of stormwater associated with activities from construction sites and prohibits discharge of materials which contain hazardous substances in excess of reportable quantities established at Title 40, Sections 117.3 or 302.4 of the Code of Federal Regulations unless a separate NPDES permit has been issued to regulate those discharges.

The General Permit requires development and implementation of a SWPPP, emphasizing Best Management Practices (BMPs), which is defined as “schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States.” The SWPPP has two major objectives:

- To help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and
- To describe and ensure the implementation of practices to reduce sediment and other pollutants in stormwater discharges.

In addition, dischargers are required to conduct inspections before and after storm events and to annually certify that they comply with the General Permit.

### ***Regional***

#### *San Francisco Bay Regional Water Quality Control Board*

RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities. The City of Pacifica lies within the jurisdiction of San Francisco Bay RWQCB (Region 2) and is subject to the waste discharge requirements of Municipal Regional Stormwater Permit (MRP; Order No. R2-2015-0049) and NPDES Permit No. CAS612008, which was issued on November 19, 2015 and became effective January 1, 2016. Under Provision C.3 of the MRP, the City uses its planning authorities to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects.

#### *San Mateo Countywide Pollution Prevention Program*

The San Mateo Countywide Pollution Prevention Program (SMCWPPP), formerly the San Mateo Countywide Pollution Prevention Program (STOPPP), was established in 1990 and is intended to reduce pollution carried by stormwater to local creeks, the San Francisco Bay, and the Pacific Ocean. The Program is a partnership between the City/County Association of Governments (C/CAG), incorporated cities and towns, and the County of San Mateo, all of

which share NPDES Permit No. CAS612008.

The C.3 Regulated Projects Guide, adopted January 2020, provides guidance for incorporation of stormwater control measures in parcel-based regulated projects in order to meet local requirements and requirements of the Municipal Regional Stormwater Permit.

### ***Local***

#### ***Pacifica Municipal Code***

The City of Pacifica's Storm Water Management and Discharge Control Ordinance, codified in Title 6, Chapter 12, Article 2 of the Pacifica Municipal Code, sets forth regulations for discharges into the storm water system. The intent of the Ordinance is to ensure compliance with federal and state standards and regulations, prohibit non-permitted discharges to the storm water system, reduce non-storm water discharge to the storm water system, reduce pollutants in storm water discharges, and establish requirements for management of storm water originating from development projects. Section 16-12.207 of the Municipal Code sets forth that new development shall comply with the storm water treatment requirements set forth in NPDES Permit No. CAS612008, including ongoing operation and maintenance of storm water facilities.

## **4.8.2 ENVIRONMENTAL SETTING**

### ***Surface Water***

The City of Pacifica is located within all or part of nine watersheds, the majority of which drain west towards the Pacific Ocean. A small portion of the City drains east toward the San Francisco Bay, contributing to the upper basin of the San Mateo Creek watershed. From north to south, the major watersheds in the City include Milagra Creek, Laguna Salada (also referred to as Sanchez Creek), Calera Creek, and San Pedro Creek. The project site is located within the San Pedro Creek watershed, which drains approximately eight square miles west toward the Pacific Ocean.

### ***Groundwater***

The City of Pacifica is underlain by the San Pedro Valley Groundwater Basin. As detailed in the North Coast County Water District 2020 Urban Water Management Plan (UWMP), the Basin contains approximately 700 acres in surface area and is defined generally by alluvial deposits. Based on records available from the Department of Water Resources (DWR) no information on the Basin's groundwater level trends, storage, or budget are available. As stated in the UWMP, the basin has historically been used in a limited fashion for domestic

and landscape irrigation supply. It is the intent of the District to continue studying the basin to determine its potential as a future alternative water supply source.

### ***Flood Zones***

Areas located within the 100-year floodplain comprise approximately 141 acres and are primarily located in lower elevation areas of Milagra Creek, Sanchez Creek, Calera Creek, Rockaway Creek, and San Pedro Creek as well as along the shoreline of the Pacific Ocean. In addition, areas within the 500-year floodplain comprise approximately 120 acres and are located near existing water sources throughout the City. Tsunami evacuation zones are located primarily west of Highway 1. A portion of the project site's frontage along Oddstad Boulevard is within moderate flood hazard zone X, which are areas between the limits of the base flood and the 0.2 percent annual chance flood, also referred to as the 500-year flood. The remainder of the site itself is an area of minimal flood hazard, and all portions of the site are outside of a tsunami evacuation zone.

### ***Stormwater***

The site slopes north to south at an average of 1.5% with elevations at the northern portion of the site being approximately 250 feet and 232 feet at the southern portion of the site. Storm water is collected onsite in area drains, inlets, and concrete drainage ditches where it is then conveyed in below grade pipes to five existing storm drain outfalls. Outfalls are located at the southern portion of the site along Yosemite Drive, at the corner of Yosemite Drive and Oddstad Boulevard, and along Oddstad Boulevard between Yosemite Drive and Big Bend Drive. Existing outfalls discharge to a 72" storm drain main in Oddstad Boulevard that flows to the southeast, which also collects runoff from the street, upstream hillside, and pipe flow from adjacent properties.

#### **4.8.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, the project would result in a significant impact to hydrology and water quality if it would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the

alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows.

4. Risk release of pollutants due to project inundation as a result of being located in flood hazard, tsunami, or seiche zones.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

#### **4.8.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

Analysis of the hydrology and water quality Impacts of the project is in part based on the Hydrology and Hydraulics Technical Memorandum, prepared by BKF, dated September 14, 2020 (Appendix 4.8-A), the Oddstad Boulevard Drainage, prepared by BKF, dated May 18, 2021 (Appendix 4.8-B), and the response to Planning Request on the Hydrology and Hydraulics Technical Memorandum and Drainage Study, prepared by BKF and dated April 26, 2022 (Appendix 4.8-C).

***Impact HYDRO-1: Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality (less than significant impact).***

Construction of the project includes demolition, excavation, grading, trenching and other activities that would result in 172,206 square feet (3.95 acres) of impervious area on the site. Overall, implementation of the project would increase the impervious footprint of the site by 42,076 square feet.

##### *Construction*

Construction activities have the potential to result in runoff that contains sediment and other pollutants that could degrade water quality if not properly controlled. Sources of potential pollution associated with construction include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to result in impacts due to chemical contamination from the release of construction equipment and materials that could pose a hazard to the environment or degrade water quality if not properly managed.

Project construction would disturb more than one acre, and, therefore, must comply with

the C.3 requirements of the Regional Water Quality Control Board's Municipal Regional Permit and NPDES. The project will be required to implement BMPs during construction including measures such as installation of fiber rolls between the proposed development and the undeveloped area along the eastern portion of the site to prevent erosion of the slopes, as well as installation of storm drain inlet protections, such as sediment filters that eliminate runoff of sediment, construction debris, and other materials into the storm drain system. Furthermore, as detailed in Mitigation Measure BIO-7, indirect impacts to the seasonal wetlands and jurisdictional drainage feature onsite will be avoided through installation of construction fencing, silt fencing, wildlife friendly hay wattles (no monofilament netting), gravel wattles, and other protective measures between project activities and the seasonal wetlands and drainage feature. With implementation of BMPs and measure BIO-7, impacts resulting from violation of water quality standards, waste discharge requirements, or degradation of water quality during construction would be less than significant.

#### *Operational*

The project would add additional areas of impervious surfaces as compared to existing conditions and could introduce pollutants that are typically associated with urban runoff into the storm water system. The project incorporates 5,586 square feet of self-retaining areas<sup>1</sup>, 299,861 square feet self-treating areas<sup>2</sup> and 6,949 square feet bioretention areas<sup>3</sup> across the site that will provide for management of storm water during operation.

The project has been reviewed by the City's Public Works Department to ensure compliance with applicable regulations and provisions of the City of Pacifica's Storm Water Management and Discharge Control Ordinance (Pacifica Municipal Code Chapter 12, Article 2) and standard conditions of approval will be imposed on the project to ensure compliance with applicable regional and local requirements. Therefore, the project would not violate any water quality standards, waste discharge requirements, or degrade water quality during operation and as such impacts would be less than significant.

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<sup>1</sup> Portions of the development site that retain the first inch of rainfall without producing stormwater runoff and may also receive runoff from adjacent impervious areas of the site.

<sup>2</sup> Portions of the development site where natural processes remove pollutants from stormwater.

<sup>3</sup> Type of biotreatment measure designed to allow evapotranspiration or infiltrate stormwater with the remainder of runoff being filtered and released back into the storm drain system.



***Impact HYDRO-2: Implementation of the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin (less than significant impact).***

A significant impact would occur if the project depleted groundwater supplies through extraction and use of groundwater for water supply, or if it would substantially interfere with groundwater recharge by reducing recharge through the construction of impervious surfaces.

Water supply for the project would be provided by the North Coast County Water District. According to the Water District's Urban Water Management Plan<sup>4</sup>, the Water District's sole source of potable water is purchased from the City and County of San Francisco's Regional Water System (RWS), operated by the San Francisco Public Utilities Commission (SFPUC or Commission). Approximately 85 percent of the water supply to the SFPUC RWS originates in the Hetch Hetchy watershed, located in Yosemite National Park, and flows down the Tuolumne River into the Hetch Hetchy Reservoir. The remaining 15 percent of the water supply to the SFPUC RWS originates locally in the Alameda and Peninsula watersheds and is stored in six different reservoirs in Alameda and San Mateo Counties.

Local groundwater is not considered to be of adequate quality or quantity to be a viable resource for augmenting water supply and has not been developed as a water supply source by the Water District, though as discussed previously, the UWMP states that it is the District's intent to study the San Pedro Valley Groundwater Basin to determine its potential as a future alternative water supply source. Furthermore, the project will redevelop an existing site with impervious surface and though the project will introduce additional impervious surface, the site has a very low infiltration rate, limiting groundwater recharge. Therefore, impacts related to the potential for the project to deplete groundwater supply or to substantially interfere with groundwater recharge would be less than significant.

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<sup>4</sup> 2020 Urban Water Management Plan for North Coast County Water District, [https://www.nccwd.com/images/North\\_Coast\\_County\\_Water\\_District\\_2020\\_UWMP.pdf](https://www.nccwd.com/images/North_Coast_County_Water_District_2020_UWMP.pdf), last accessed January 18, 2022

***Impact HYDRO-3: Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows (less than significant impact).***

A significant impact would occur if the project altered the site drainage pattern through grading during construction, and through alteration of the rate, volume, and/or duration of stormwater runoff during the operational phase resulting from an increase in impervious surfaces. As proposed, the project will not substantially alter the course of a stream or river, or otherwise substantially alter the drainage pattern relative to existing conditions. Currently stormwater runoff from the project site is collected in area drains, inlets, and concrete drainage ditches, then conveyed in below grade pipes to storm drain outfalls located in Oddstad Boulevard and Yosemite Drive.

The project proposes to install a new drainage system as well as retain existing systems onsite. The project will increase the amount of impervious surface as compared to existing conditions and will require detention to control the peak flow leaving the site so that it does not exceed the pre-project flow. As described previously, the project will implement measures to control erosion during construction and a system of self-retaining, self-treating and bioretention areas will be installed to retain and treat stormwater runoff prior to discharge in the City's storm water system at operation.

According to the analysis presented in the Oddstad Boulevard Drainage Study (Appendix 4.8-B), the existing 72-inch storm water pipe, running along Oddstad Boulevard, can convey the 100-year design storm event. However, it is unlikely the inlets in the street are designed to capture the 100-year event, which is consistent with most municipalities in the Bay Area. If an inlet does not capture 100% of the flow in the gutter, runoff would bypass the inlet and run down the street to the next inlet. In this scenario, the street can convey up to 55 cubic feet per second (cfs) without topping the curb. As detailed in the Hydrology and Hydraulics Technical Memorandum (Appendix 4.8-A), the project would increase the total impervious area from existing conditions, thereby increasing the peak flow design storm events, absent any design features to manage the increase in peak flow leaving the site. As detailed therein, the project would result in an increase of 1.46 cfs for the 10 year 10 minute storm event and

2.21 cfs for the 100 year 10 minute storm event. However, the project is located in a Hydromodification Area and as such is required to comply with Hydromodification requirements set forth in the SMCWPPP regulations. The objective of these requirements is to control stormwater discharges to ensure discharges do not increase the erosion potential of the receiving creek over existing, or pre-project, conditions. The project has been designed to include oversized bioretention facilities to provide additional storage of up to 12 inches of ponding to ensure peak flow leaving the site is not increased as a result of the project. The project design as proposed and conditioned through standard conditions of approval, will comply with regulations regarding storm water control which will ensure that implementation of the project would not substantially alter the existing drainage pattern of the site or area. As such, impacts resulting from the project will be less than significant.

***Impact HYDRO-4: Implementation of the proposed project would not result in the risk of release of pollutants due to project inundation as a result of being located in a flood hazard, tsunami, or seiche zone (less than significant impact).***

Although a portion of Oddstad Boulevard along the project frontage is within an area designated by FEMA as moderate flood hazard zone X, which includes areas between the limits of the base flood and the 0.2 percent annual chance flood, the majority of the site is in an area of minimal flood hazard. Flooding along Oddstad Boulevard associated with the flood hazard zone X represents an existing condition. All portions of the project will be constructed outside of the flood hazard area and as described above will be designed to mimic pre-project conditions. The project, with its construction outside of the flood zone, will not risk the release of pollutants due to project inundation. All portions of the site are outside of a tsunami evacuation zone. The nearest enclosed body of water, San Andreas Lake, is located approximately 2.2 miles from the site and is on the San Andreas Fault. As such, the Lake could be subject to seiche. However, this is not considered a threat to the City of Pacifica, including the project site because of the difference in elevation and intervening topography. Based on the limited moderate flood hazard potential along the project site's frontage, and location outside of a tsunami or seiche zone, impacts related to the risk of release of pollutants due to project inundation would be less than significant.

***Impact HYDRO-5: Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (less than significant impact).***

All municipalities within San Mateo County are required to develop surface water control standards for new development projects to comply with Provision C.3 of the Regional Water

Quality Control Board Municipal Regional Stormwater NPDES Permit order No. R2-2015-0049. The San Mateo Countywide Water Pollution Prevention Program, C.3 Stormwater Technical Guidance document was developed to provide guidance on implementation of the RWQCB Municipal Regional Stormwater NPDES Permit C.3 requirements, known as the C.3 Standards. The City of Pacifica has adopted the County C.3 Standards as part of the City's NPDES General Permit requirements, which require new development and redevelopment projects that create or alter 10,000 square feet or more of impervious area to contain and treat stormwater resulting from a design volume storm event. Generally, this includes smaller storm events. Given that the proposed project would create more than 10,000 square feet of impervious area, it is considered a regulated project and therefore required to comply with the C.3 Stormwater Technical Guidance. As proposed, the project provides 5,586 square feet of self-retaining areas, 299,861 square feet of self-treating areas and 6,949 square feet of bioretention areas. Runoff from impervious areas, such as building roofs, and pavement, would be routed through these areas prior to discharge. As a standard condition of approval, basin sizing requirements will be finalized prior to building permit issuance and will be required to comply with the C.3 requirements. As stated previously, the North Coast County Water District does not currently utilize groundwater for water supply, and as such there is no adopted groundwater management plan. Based on the project's compliance with applicable regulations governing water quality, impacts resulting from implementation of the project would be less than significant.

#### **4.8.5 APPENDICES**

- Appendix 4.8-A: Hydrology and Hydraulics Technical Memorandum, prepared by BKF, September 14, 2020
- Appendix 4.8-B: Oddstad Boulevard Drainage Study, prepared by BKF, May 18, 2021
- Appendix 4.8-C: 930 Oddstad Boulevard Planning Request for Information, prepared by BKF, April 26, 2022

#### **4.8.6 REFERENCES**

1. Maps numbered 06081CO128E, 06081CO129E,  
<https://msc.fema.gov/portal/search?AddressQuery=930%20Oddstad%20Blvd%2C%20Pacifica%2C%20CA#searchresultsanchor>
2. 2020 Urban Water Management Plan for North Coast County Water District,  
[https://www.nccwd.com/images/North\\_Coast\\_County\\_Water\\_District\\_2020\\_UWMP.pdf](https://www.nccwd.com/images/North_Coast_County_Water_District_2020_UWMP.pdf)
3. California Department of Conservation, San Mateo County Tsunami Hazard Areas,  
<https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo>



## 4.9 LAND USE AND PLANNING

This section describes the regulatory framework regarding land use and planning, summarizes the existing land uses at the project site and surrounding area, and analyzes the project's potential to result in environmental impacts related to division of an established community or conflict with land use policies and regulations adopted to avoid environmental effects.

### 4.9.1 REGULATORY CONTEXT

#### **State**

##### *California General Plan Law*

California Government Code Section 65300 requires all counties and cities in the State to prepare and maintain a General Plan addressing long-term growth, development, and management of resources and land within the jurisdiction's planning area. Development regulations such as zoning and subdivision standards are required to be consistent with the adopted General Plan. Mandatory General Plan topics include circulation, conservation, environmental justice, housing, land use, noise, open space, and safety. In addition to mandatory elements, jurisdictions may elect to include optional elements.

#### **Regional**

##### *Plan Bay Area – Sustainable Community Strategy*

Plan Bay Area is a long-range, integrated transportation, land-use, and housing strategy for the San Francisco Bay Area. The plan includes the region's Sustainable Communities Strategy (SCS) and the 2040 Regional Transportation Plan. The Plan Bay Area 2040 regional plan marks the region's first long-range plan to meet the requirements of Senate Bill 375, which requires each metropolitan area to develop a SCS to accommodate future population growth and reduce greenhouse gas emissions. In collaboration with cities and counties, the plan advances initiatives to expand housing and transportation choices, create healthier communities, and build a stronger regional economy. The plan includes housing and population forecasts and encourages future development in Priority Development Areas (PDAs) and discourages development in Priority Conservation Areas. The Plan's core strategy is to focus growth along the existing transportation network. Consistent with this core strategy, the Plan includes goals to reduce carbon dioxide emissions, provide adequate housing, reduce health impacts of adverse air quality, preserve open space and agricultural lands, locate jobs and housing in closer proximity, and reduce automobile use. In October

2021, the Metropolitan Transportation Commission (MTC) and the Bay Area Association of Governments jointly adopted Plan Bay Area 2050, including an implementation plan, which identifies specific action of MTC, ABAG, and partner organization to take over the next five years to accomplish identified strategies.

### **Local**

#### *City of Pacifica General Plan 1980*

The 1980 General Plan provides guidance for existing and future land uses within the City. The project site is located in the Park Pacifica neighborhood, is designated Low Density Residential<sup>1</sup> and is surrounded primarily by properties designated Low Density Residential (LDR), which provides for a residential density of three to nine dwelling units per acre. The General Plan specifies that when a public school use is discontinued, the land use of the site should be designated to be consistent and compatible with surrounding uses and any existing recreational facilities should remain publicly available to neighborhood residents. The following land use related policies and programs contained in the 1980 General Plan are applicable to the project:

- Land Use Element
  - ♦ Ridgelines designated as visually prominent shall be protected from residential and commercial development.
  - ♦ Land use and development shall protect and enhance the individual character of each neighborhood.
- Open Space Element
  - ♦ Retain open space which preserves natural resources, protects visual amenities, prevents inappropriate development, provides for the managed use of resources, and protects the public health and safety.
  - ♦ Provide outdoor recreation in local parks, open space, and school playgrounds in keeping with the need, scale and character of the City and of each neighborhood.
  - ♦ Encourage development plans which protect or provide generous open space appropriately landscaped. Balance open space, development, and public safety,

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<sup>1</sup> The project site was designated as Oddstad School in the 1980 General Plan. On July 11, 2022, the Pacifica City Council adopted the 2040 General Plan which changed the project site's land use designation to Low Density Residential. The project initially included a request for City approval of a General Plan amendment to Low Density Residential, which is no longer necessary because of the City Council's adoption of the 2040 General Plan. The provisions of Government Code section 66498.1 notwithstanding, the City considers the applicable General Plan land use designation for the project site to be Low Density Residential, consistent with Government Code section 66498.4 and the applicant's request for an identical General Plan amendment. The provisions of Government Code section 66498.1 apply for all other purposes in this EIR except the General Plan land use designation change requested by the applicant.



particularly in the hillside areas.

#### *Pacifica Municipal Code*

Title 9, Chapter 4 of the Pacifica Municipal Code provides the City of Pacifica Zoning Regulations and is intended to promote growth in an orderly manner that ensures protection of the public health, safety, comfort, and general welfare. Zoning designations established by this Title implement the City's General Plan, specify permissible land uses, and set forth development standards such as building setbacks and height limits. The following zoning regulations contained in the Municipal Code are relevant to the project and are discussed in detail throughout this document.

- Article 22 (Planned Development District)
- Article 23 (General Provisions and Exceptions)
- Article 28 (Off-Street Parking and Loading)
- Article 32 (Site Development Permits)
- Article 47 (City of Pacifica Below Market Rate (Inclusionary) Program)
- Article 50 (Development Agreements)

#### **4.9.2 ENVIRONMENTAL SETTING**

The City of Pacifica encompasses approximately 12.2 square miles and maintains a variety of existing land uses, including residential, commercial, institutional, and open space. While most developable land is built out, remaining undeveloped land includes individual lots, steep slopes, and ridgelines. The project is located in the southeast portion of the City, outside the Coastal Zone, and within the Park Pacifica neighborhood, which predominantly contains land designated as Low Density Residential, interspersed with greenbelts. The neighborhood is served by existing recreational, educational, and commercial facilities within close proximity such as Frontierland Park, Ortega School, Terra Nova High School, and the Park Mall Shopping Center, located at the intersection of Oddstad Boulevard and Terra Nova Boulevard.

The project site has a General Plan Land Use Designation of Low Density Residential and is Zoned as Single-Family Residential (R-1), which permits by-right single-family dwellings, accessory dwelling units (ADUs), junior ADUs, child day care homes, small special care facilities, and accessory buildings and uses. As briefly described above, the project proposes to rezone the site from R-1 to Planned Development District (P-D), which allows for diversification of the relationships of buildings and open spaces in planned building groups, while also ensuring substantial compliance with the district regulations and provisions of the Zoning Chapter of the Municipal Code. The rezoning proposal requires City Council approval,

as a legislative action.

The project site is surrounded primarily by R-1 zoning districts, containing primarily single-family residences. East of the site is Frontierland Park which is zoned Commercial Recreation (C-R). The project site currently contains a vacant single story school facility and recreational fields at the north and south portions of the site. The project would demolish the existing school buildings to accommodate 70 residential units, amenities, and accessory buildings. The recreational field at the northern portion of the site would be removed to accommodate the proposed project, however, the southern recreational field would be retained for public use.

#### **4.9.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant impact related to land use and planning if it would:

1. Physically divide an established community
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact

#### **4.9.4 ANALYSIS, IMPACTS AND MITIGATION MEASURES**

Impacts to land use and planning resulting from implementation of the proposed project are discussed below. The following impact analysis is based on significance criteria listed in 4.11.3 above and identifies potential direct and indirect land use and planning impacts from the proposed project.

***Impact LUP-1: The project would not physically divide an established community (less than significant impact).***

Division of an established community typically occurs when a new physical feature, such as an interstate or railroad, physically transects an area, thereby removing mobility and access within an established community. The division of an established community can also occur through removal of an existing road or pathway, which would reduce or remove access between a community and outlying areas.

The project would demolish the vacant school complex and would construct 70 multi-family housing units, a portion of which would be available as workforce housing for staff employed by the Pacifica School District, neighboring school districts, and other public employees. The project also proposes residential amenity buildings including a recreation building,

restroom, which would be available for public use, and office space. The site is in an established residential neighborhood and is served by the existing roadway network, including Oddstad Boulevard adjacent to the site, which provides local access from the site to Highway 1 via regional arterials including Terra Nova Boulevard and Linda Mar Boulevard, and therefore does not require construction of new roadways that could physically divide an established community. Furthermore, the project would retain the existing recreational field and parking lot at the southern portion of the project site and proposes to establish a public access easement connecting this portion of the site to the proposed publicly accessible restroom facility, thereby formalizing community access. The project would not introduce a new physical feature, nor would it remove access between the community and outlying areas. As such, impacts resulting from physical division of an established community would be less than significant.

***Impact LUP-2: The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact (less than significant impact).***

With approval of the proposed rezoning from R-1 to P-D, the project would be generally consistent with the General Plan, Zoning, and land use regulations established by the City of Pacifica.

#### *General Plan*

The project site is designated in the General Plan as Low Density Residential. As discussed previously, the General Plan specifies that when an educational use is discontinued, proposed uses should be compatible with adjacent residential uses, existing recreational facilities should remain available for use by the surrounding neighborhood, and the land use of the site should be redesignated to ensure consistency and compatibility with the existing adjacent land uses. The Low Density Residential land use designation is compatible with the adjacent residential uses. The project proposes to introduce a residential use to an established residential neighborhood and retain the existing recreational field for public use, which is consistent with adjacent residential development surrounding the project site. The proposed residential density is approximately nine dwelling units per acre, which is consistent with the density established for the LDR land use designation, which allows for three to nine units to the acre. Furthermore, the project would contribute to meeting the City's Regional Housing Needs Allocation by providing units at the low and moderate income levels, and is consistent with General Plan policies that (1) seek to protect visually prominent ridgelines as the height and massing of the proposed structures would not block views of

hillsides, (2) maximize open space access as the project would retain the existing recreational field for public access at the southern portion of the site, and (3) protect and enhance the individual character of each neighborhood as the proposed architectural style, colors and materials, and site layout are compatible with surrounding residential uses. Therefore, the project would not conflict with the City's General Plan and impacts resulting from a conflict with adopted policies and regulations would be less than significant.

### *Zoning*

The proposed rezoning from R-1 to the P-D designation provides for establishment of individual site development standards that are compatible with surrounding uses and account for unique site features. The proposed structures would be clustered toward the northwest portions of the site, allowing for preservation of the recreational field to the south as well as the steeply sloped hillside to the east. As noted in Section 9-4.2204 (Development Standards P-D) of the Pacifica Municipal Code, development regulations shall be guided by the regulations of the zoning districts most similar in nature and function to the proposed P-D District. The site is located adjacent to established single-family residences on sites zoned R-1. Given that the project proposes a multi-family development, the R-3 standards would apply. Table 4.9-1 provides a comparison between the R-3 and proposed Planned Development regulations.

**TABLE 4.9-1: DEVELOPMENT REGULATIONS COMPARISON: R-3 AND P-D**

<b>Development Standards</b>	<b>Single-Family Residential (R-3)</b>	<b>Proposed Planned Development District (P-D)</b>
Building Site Area	5,000 s.f. minimum	Lot 1: 5.02 acres Lot 2: 4.69 acres Lot 3: 2.78 acres
Lot Area/Dwelling	2,075 s.f. minimum	Lot 1: NA Lot 2: 4,540 s.f. Lot 3: 4,845 s.f.
Lot Coverage	60% maximum	Lot 1: NA Lot 2: 13% (25,941 s.f./204,296 s.f.) Lot 3: 12% (14,902 s.f./121,096 s.f.)
Landscape Area	20% minimum	Lot 2 & 3: 20% (66,574 s.f./325,392 s.f.)
Height	35 feet (primary) 12 feet (accessory)	25' 3 ¾" – 30'

*Source: Pacifica Municipal Code, Title 9, Chapter 4, Article 6 (R-3 Multiple-Family Residential District); Project Drawings, prepared by BDE Architecture, May 11, 2021; Vesting Tentative Parcel Map, prepared by BKF Engineers, February 1, 2021.*

In addition to site development regulations discussed above, the project is also subject to regulations governing tree removal and replacement (Title 4, Chapter 12), minimum dwelling unit size (Title 9, Chapter 4, Article 23), parking requirements (Title 9, Chapter 4, Article 28), inclusionary housing requirements (Title 9, Chapter 4, Article 47), consistency with the requirements set forth under Title 9, Article 32, which requires approval of a Site Development Permit, and Title 9, Article 50, which provides for approval of a Development Agreement. As proposed, the project would not conflict with applicable regulations set forth in the City's Municipal Code, and impacts resulting from a conflict with adopted regulations would be less than significant.

#### *Plan Bay Area*

Plan Bay Area highlights regional housing, transportation, and land use needs, and provides strategies for local governments to address these needs. The project would increase the number of affordable and workforce housing units in the City, thereby providing options for housing to individuals who may otherwise live elsewhere, which in turn reduces regional transportation demand by placing jobs and housing in close proximity. Therefore, the project does not conflict with the strategies set forth in Plan Bay Area, and impacts resulting from a conflict with the adopted plan would be less than significant.

#### *Conclusion*

In conclusion, the project would not conflict with any local or regional land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact and therefore impacts of the project would be less than significant.

### **4.9.5 REFERENCES**

1. City of Pacifica Municipal Code:
  - a. Title 9, Chapter 4, Article 22 (Planned Development District)
  - b. Title 9, Chapter 4, Article 23 (General Provisions and Exceptions)
  - c. Title 9, Chapter 4, Article 28 (Off-Street Parking and Loading)
  - d. Title 9, Chapter 4, Article 32 (Site Development Permits)
  - e. Title 9, Chapter 4, Article 47 (City of Pacifica Below Market Rate (Inclusionary))

Program)

- f. Title 9, Chapter 4, Article 50 (Development Agreements)
- 2. Plan Bay Area 2050 Final Plan, Implementation Plan, and Environmental Impact Report  
<https://www.planbayarea.org/>

## 4.10 NOISE

This section summarizes the regulatory framework for evaluating noise, the existing site setting, and discusses the potential impacts resulting from implementation of the proposed project. Technical terminology referenced throughout this section is provided in 4.10.2. The following documents were used to analyze the potential impacts that could occur:

- Construction Noise and Vibration Assessment, prepared by Illingworth & Rodkin Inc, November 17, 2021.

### 4.10.1 REGULATORY CONTEXT

#### ***Federal***

##### *United States Department of Transportation*

The United States Department of Transportation (DOT) is responsible for maintaining and developing the nation's transportation and infrastructure. The Federal Aviation Administration (FAA), Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), and Federal Transit Administration (FTA) address specific areas of the transportation network and have regulatory authority related to noise impacts.

Through regulations contained in the Code of Federal Regulations (23 CFR Part 772), the FHWA, FRA, and FTA have established recommendations to conduct thorough noise and vibration assessments for any highway, high-speed railroad, or mass transit project that would be constructed proximate to residential areas. These recommendations apply to projects that are federally funded or that require federal review.

##### *Department of Housing and Urban Development*

New residential developments that qualify for Department of Housing and Urban Development (HUD) financing and are proposed in noise areas exceeding 65 dBA Ldn are required to incorporate noise attenuation features to maintain acceptable interior noise levels. Noise attenuation requirements are intended to achieve a level of 45 dBA Ldn or less. Standard construction techniques provide sufficient attenuation to achieve the 45 dBA Ldn level where the exterior noise level is 65 dBA Ldn or less. Approvals in a "normally unacceptable noise zone" (exceeding 65 dBA but not exceeding 75 dBA) require a minimum of 5 dBA additional noise attenuation if the day-night average is greater than 65 dBA, but not exceeding 70 dBA. A minimum of 10 dBA additional noise attenuation is required if the day-night average is greater than 70 dBA but does not exceed 75 dBA.



### *Environmental Protection Agency*

The Environmental Protection Agency (EPA) has determined that over a 24-hour period, an equivalent noise level (Leq) of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior noise levels remain at or below a 55 dBA Leq and interior levels at or below 45 dBA. Although these levels are relevant for planning and design and useful for informational purposes, they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community.

The EPA has set 55 dBA Ldn as the basic goal for residential environments. However, other federal agencies, in consideration of their own program requirements and goals, as well as acknowledgement of the difficulty of achieving a goal of 55 dBA Ldn, have generally agreed on 65 dBA Ldn as appropriate for residential uses as activity interference is kept to a minimum, and annoyance levels are still relatively low.

### **State**

#### *California Government Code*

California Government Code Section 65302(f) requires all General Plans to include a Noise Element to address noise in the community. The State Office of Planning and Research (OPR) has established guidelines for the content of the Noise Element, noting that the noise element shall identify and appraise noise problems in the community. The noise element shall also recognize the guidelines established by the Office of Noise Control, and analyze and quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Commercial, general aviation, heliport, and military airport operations, aircraft flyovers, jet engine test stands, and all other ground facilities and maintenance functions related to airport operation
- Local industrial plants, including, but not limited to, railroad classification yards
- Other stationary ground noise sources identified by local agencies as contributing to the community noise environment

#### *State of California Code of Regulations*

The State of California's noise insulation standards are codified in the California Code of Regulations (CCR), Title 24, Building Standards Administrative Code, Part 2, California

Building Code (CBC). These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

#### *California Noise Land Use Compatibility Matrix*

The State Department of Health Services, Office of Noise Control establishes compatibility of land uses relative to existing and future ambient noise levels. Appendix D of the State of California General Plan Guidelines, prepared by the Governor's Office of Planning and Research and reproduced below as Table 4.10-1, identifies noise level acceptability for each land use type from 'normally acceptable', to 'clearly unacceptable'. Normally acceptable indicates new standard construction can occur with no special noise reduction requirements.

**TABLE 4.10-1: LAND USE COMPATIBILITY MATRIX (DBA CNEL)**

Land Use	55	60	65	70	75	80
Low Density Single Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels, Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						

[illegible]

**Local**

## City of Pacifica General Plan 1980

The Noise Element of the General Plan identifies traffic on arterial/collector streets as the primary contributor to noise in the City. In particular, Highway 1 generates the highest level of noise at approximately 75 dBA. While the City is within proximity of San Francisco International Airport, no portion of the City is within the 65 dB CNEL noise contour for the airport. Policies intended to regulate noise in the City of Pacifica that are particularly relevant to the proposed project include the following:

- Establish and enforce noise emission standards for Pacifica which are consistent with the residential character of the City and environmental, health and safety needs of the residents.
- The noise impact on land uses should be considered when development plans are reviewed and approved. Where existing ambient noise levels are high, or where the proposed use will create additional noise, the builder should be required to mitigate the noise.

*Pacifica Municipal Code, Title 5, Chapter 10 (Loud, Disturbing, Unusual, And Unnecessary Noise)*

Title 5, Chapter 10 of the Pacifica Municipal Code establishes that prolonged loud, unnecessary, unnatural, or unusual noises can be detrimental to the public health, comfort, convenience, safety, welfare, and prosperity of the residents of the City and sets forth time restricts and other regulations for certain noise-generating activities.

*Pacifica Municipal Code, Title 5, Chapter 29 (Mandatory Real Estate Transfer Disclosure Regarding Airport Noise)*

Title 5, Chapter 29 of the Pacifica Municipal Code requires any seller of a single or multi-family residential dwelling within the City of Pacifica to provide disclosure documentation to the buyer of such property regarding noise associated with the San Francisco International Airport. In addition to general disclosure requirements, Section 5-29.03 sets forth special disclosure requirements for properties located within the aircraft noise footprint.

#### 4.10.2 ENVIRONMENTAL SETTING

##### **Noise Fundamentals**

Noise is defined as unwanted sound and is usually objectionable due to its disturbing or annoying nature. Environmental noise is a component of modern society and is produced by a variety of sources including automobiles, machinery, and people. Sounds which are considered desirable to some may be considered objectionable to others. Table 4.10-2 includes a list of terms used to characterize and describe noise.

**TABLE 4.10-2: DEFINITIONS OF ACOUSTICAL TERMS**

Noise Descriptor	Definition
<b>Decibel, dB</b>	A unit describing, the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20 micro Pascals.
<b>Frequency, HZ</b>	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and Ultrasonic sounds are above 20,000 Hz.
<b>A-Weighted Sound Level, dBA</b>	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
<b>Equivalent Noise Level, Leq</b>	The average A-weighted noise level during the measurement period.
<b>Lmax, Lmin</b>	The maximum and minimum A-weighted noise level during the measurement period.
<b>L01, L10, L50, L90</b>	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
<b>Day/Night Noise Level, Ldn or DNL</b>	The average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10:00 pm and 7:00 am.
<b>Community Noise Equivalent Level, CNEL</b>	The average A-weighted noise level during a 24-hour day, obtained after addition of 5 decibels in the evening from 7:00 pm to 10:00 pm and after addition of 10 decibels to sound levels measured in the night between 10:00 pm and 7:00 am.
<b>Ambient Noise Level</b>	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.

Noise Descriptor	Definition
<b>Intrusive</b>	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

### *Characteristics of Sound*

#### **Amplitude**

Sound is produced by the vibration of sound pressure waves in the air. Sound pressure levels are used to measure the intensity of sound and are described in terms of decibels. The decibel (dB) is a logarithmic unit that expresses the ratio of the sound pressure level being measured to a standard reference level. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. An increase of 10 decibels represents an increase in acoustic energy of 10 times, where 20 decibels is 100 times more intense, 30 decibels is 1,000 times more intense, and so on. Ambient sounds generally range from 30 to 100 dBA. A change in sound of 3 dBA is considered the minimum change detectable to the human ear, where 5 dBA is detectable to most people in an exterior setting.

#### **Frequency**

Frequency is defined as the number of complete pressure fluctuations per second above and below atmospheric pressure and is measured in Hertz (Hz). Sound waves that are below 16 Hz and above 15,000 Hz are not typically perceptible to the human ear.

While there are several methods used to characterize sound, the A-weighted decibel (dBA) is most used as it gives greater weight to those frequencies which are audible to the human ear. For reference, the noise level of a rock concert would be approximately 110 dBA whereas the noise level of normal breathing would be approximately 10 dBA.

#### **Temporal Effects**

Noise impacts are measured for both instantaneous events as well as noise measurements over an extended period. The longer the duration of sound, the more likely it is to be an annoyance or cause direct physical or environmental stress. The noise metric used to account for both duration and sound level is the Leq. Leq, as defined in Table 4.10-2, is the single steady A-weighted level that is equivalent to the amount of energy contained in the average noise level. Generally, Leq is totaled over a one-hour period.

The time in which noise occurs is also an important factor to consider as it relates to impacts on people since nighttime noise tends to disturb people more than daytime noise. The Day-

Night average (Ldn) and the Community Noise Equivalent Level (CNEL) are noise metrics which account for the greater sensitivity to noise during the nighttime. With the Ldn metric, nighttime sensitivity is accounted for by adding 10 dB to the nighttime period (10 p.m. to 7 a.m.). The CNEL metric is identical to the Ldn, except that it also adds 5 dB to the evening period (7 p.m. to 10 p.m.). Since Ldn and CNEL levels typically do not differ by more than 1 dBA, they are often used interchangeably.

### **Sound Propagation**

Noise dissipates as distance from the source increases. The way noise reduces with an increase in distance depends on geometric spreading, ground absorption, atmospheric impacts, and shielding by natural and manmade features, such as vegetation, buildings, or sound walls. Sound produced by a point source travels uniformly away from the source in a spherical pattern and drops off at a rate of 6 dBA for each doubling of distance.

### **Psychological and Physiological Effects of Noise**

Noise is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels can impact the entire human system. Noise exposure in excess of 75 dBA increases body tensions, and thereby affects blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. Based on these known adverse effects of noise, the federal government, State of California, and local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

#### *Groundborne Vibration*

Vibration is a trembling, quivering, or oscillating motion of the earth and is typically of a frequency that is felt rather than heard.

### **Types of Vibration**

Vibration can be produced naturally, such as in the form of earthquakes, volcanic eruptions, sea waves, or landslides, or can be manmade such as from explosions, or the operation of heavy machinery or heavy vehicles such as trains. Both natural and manmade vibration may be continuous or transient. Vibration is transmitted through propagation. Propagation of earth borne vibrations is dependent upon the physical environment and is difficult to predict. The following are three main types of vibration propagation:

- **Surface waves** travel along the ground's surface carrying most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water.
- **Compression waves**, also known as P waves, are body waves where particles are displaced parallel to the wave direction.
- **Shear waves**, also known as S waves, are body waves where particles are displaced perpendicular to the wave direction.

As vibration waves propagate from a source, the energy is spread over an increasing area reducing the energy level with increased distance from the energy source. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

### **Amplitude**

Amplitude is characterized in three ways: displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position and for the purposes of soil displacement is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Particle acceleration is the rate of change in velocity with respect to time and is measured in inches per second or millimeters per second. Typically, particle velocity (measured in inches or millimeters per second) and/or acceleration (measured in gravities) are used to describe vibration.

### **Frequency**

Vibrations also vary in frequency which affects perception. Typical construction vibrations are between 10 to 30 Hz and usually occur at 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate frequencies around 30 Hz at high vehicle speeds.

### **Noise Sources**

Primary sources of noise in Pacifica include freeway and arterial roadways and noise generated by flyover of aircrafts from the San Francisco International Airport. Residential neighborhoods primarily experience noise associated with traffic on local roadways, and typical activity associated with residential uses such as landscaping maintenance, people talking, and operation of vehicles. Existing commercial and industrial uses also contribute to the ambient noise environment in the City. In addition to operational noise associated with traffic on freeways and arterial roadways, and operation of residential, commercial, and



industrial uses, construction and maintenance activities also contribute to the noise environment within the City on a temporary basis.

#### 4.10.3 THRESHOLDS OF SIGNIFICANCE

As provided in Appendix G of the CEQA Guidelines, the project would result in a significant noise impact if it would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
2. Generate excessive groundborne vibration or groundborne noise levels
3. Expose people residing or working in the project area to excessive noise levels (for projects located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport)

#### 4.10.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

***Impact NOI-1: The proposed project could involve generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (potentially significant impact).***

Project construction would result in temporary and intermittent noise from activities such as demolition, site preparation, grading, excavation, material hauling, deliveries, and foundation work, as well as framing and finishes to a lesser extent. Construction activities approximately 100 feet from the closest residences have the potential to exceed existing daytime noise levels periodically over the course of the approximately 19-month construction period.

A Construction Noise and Vibration Assessment (Appendix 4.10-A) analyzed construction noise generated by the project and provided recommendations to minimize noise impacts. Construction associated with the project has the potential to result in temporary and occasional noise that may impact the surroundings. Where no noise reduction measures are put in place, the noise levels at the closest residence could be between 72 to 84 dBA L<sub>max</sub> and 68 to 82 dBA L<sub>eq</sub>. To minimize noise levels during construction, the Assessment identified noise abatement measures including limiting construction hours from 7 a.m. to 7 p.m. on weekdays and 9 a.m. to 5 p.m. on weekends (consistent with standard Pacifica

construction hours); staging equipment as far as possible from sensitive uses; using acoustical enclosures; substituting certain equipment for quieter alternatives where possible; notifying residents of construction; and designating a noise disturbance coordinator. **Mitigation Measure NOI-1** imposes these noise abatement strategies on the project. Construction noise would occur on a temporary basis during active construction activities and would cease once construction is complete. With implementation of the measure NOI-1, temporary construction noise impacts would be reduced to less than significant.

At operation, the project, as a multi-family residential development, would generate noise typical of residential uses. Noise associated with residential uses include outdoor activities, operation of HVAC and mechanical equipment, use of landscaping maintenance equipment, and vehicle operations. Residents are required to comply with the City's noise regulations for ongoing operations under Pacifica Municipal Code Chapter 10, which prohibits any loud, disturbing, unnecessary, or unusual noise. It enumerates noises (e.g., vehicle noise, radios, loudspeakers, shouting, animal noise, and engine noise) that when produced in manners described in the chapter could be in violation and would be subject to enforcement for corrective action. Use of the recreational facilities at the southern portion of the project site would continue in the same manner as prior to the project, and would not result in any change in noise levels. Therefore, the project's operations would result in less than significant impacts to ambient noise levels.

***Impact NOI-2: The proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels (less than significant).***

During construction, heavy equipment used for demolition, grading, excavation, paving, and building construction would create temporary, localized vibrations in the immediate vicinity of the area of work. The Construction Noise and Vibration Assessment (Appendix 4.10-A) evaluated vibration impacts that may result from the proposed project. Vibrations generated from construction of the project would fall below the threshold of 0.3 in/sec PPV that could potentially result in structural damage to existing residential buildings in the project site vicinity. At 40 feet, the closest distance where vibration could be generated by construction equipment near existing residences, vibration levels were conservatively calculated to reach 0.125 in/sec PPV from equipment capable of generating the greatest vibrations (vibratory rollers). The proposed construction does not include the use of pile driving, which can cause excessive vibrations.

Groundborne vibration generated by the project during construction is calculated to be

under the threshold for structural damage, although vibrations could be perceptible. Such vibrations would be intermittent and for short durations, as necessary for construction. With scheduling of construction to be limited to standard construction hours by the City of Pacifica, activities that have potential to generate perceptible vibrations would be restricted to daytime hours. Therefore, construction related groundborne vibration impacts would be less than significant.

At operation, there are no activities proposed by the project that are expected to generate perceptible groundborne vibration or noise. Therefore, at operation, groundborne vibration would result in less than significant impacts.

***Impact NOI-3: The proposed project, would not expose people residing or working in the project area to excessive noise levels as a result of being located in an airport land use plan (no impact).***

The City of Pacifica is located within the Airport Influence Area of San Francisco International Airport, for which Airport Land Use Compatibility Plan (ALUCP) analyzes and establishes policies for potential impacts due to airport operations, including noise impacts. However, the project site is more than three miles outside of the identified 2020 CNEL noise contour map of the ALUCP, which define areas potentially impacted by aircraft noise and where noise compatibility measures would apply. As such, the project site is not located within an area that would subject new residents to excessive noise levels due to airport operations. Therefore, there would be no impacts associated exposing people residing in the project area to excessive noise levels as a result of being locating in an airport land use plan.

### ***Mitigation Measures***

**NOI-1:** Construction activities shall comply with the following best management practices to minimize noise levels from the proposed development:

- Construction will be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays.
- The contractor shall use “new technology” power construction equipment with state-of-the-art noise shielding and muffling devices. All internal combustion engines used on the project site shall be equipped with adequate mufflers and shall be in good mechanical condition to minimize noise created by faulty or poorly maintained engines or other components.
- Staging areas and stationary noise-generating equipment shall be located as far as possible from noise-sensitive receptors, such as residential uses (a minimum of 200 feet).
- Ensure that generators, compressors, and pumps are housed in acoustical enclosures.
- Locate cranes as far from adjoining noise-sensitive receptors as possible.

- During final grading, substitute graders for bulldozers, where feasible. Wheeled heavy equipment are quieter than track equipment and should be used where feasible.
- Substitute nail guns for manual hammering and electrically powered tools for noisier pneumatic tools, where feasible.
- The adjacent residences within 200 feet of the project site shall be notified not less than 96 hours prior to the start of each phase of the project, including but not limited to demolition, grading, and construction. Notifications shall indicate the hours of operation and planned timeline for the respective phase.
- A “noise disturbance coordinator” shall be designated to respond to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (e.g., beginning work too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

#### **4.10.5 APPENDICES**

- Appendix 4.10-A: Construction Noise and Vibration Assessment, prepared by Illingworth & Rodkin Inc, November 17, 2021.

#### **4.10.6 REFERENCES**

1. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport

## 4.11 POPULATION AND HOUSING

This section summarizes the regulatory framework for evaluating population and housing, describes the existing setting of the project site and surrounding area, and analyzes the project's potential to result in impacts related to unplanned population growth and displacement of existing residences within the City of Pacifica.

### 4.11.1 REGULATORY CONTEXT

#### **State**

##### *State Housing Element Statutes*

State of California housing element statutes (Government Code Sections 65580-65589.9) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, State housing policy rests largely upon the effective implementation of local general plans and in particular, housing elements. Additionally, Government Code Section 65588 dictates that housing elements must be updated at least once every eight years. The City of Pacifica General Plan Housing Element is described below. The City of Pacifica currently has an approved Housing Element for the planning period of 2015 to 2023 and is working towards adopting an updated Housing Element for the planning period of 2023 to 2031.

##### *California Relocation Law, Public Resources Code Section 7260 et seq.*

The California Relocation Law requires the fair and equitable treatment of persons displaced as a direct result of programs or projects undertaken by a public entity. The law requires agencies to prepare a relocation plan, provide relocation payments, and identify substitute housing opportunities for any resident that is to be displaced by a public project.

#### **Regional**

##### *Regional Housing Needs Plan*

A Regional Housing Needs Plan is required under California Government Code Section 65584 to enable regions to address housing issues and meet housing needs based on future growth projections for the area. The State determines the number of total housing units needed for each region. ABAG allocates housing needs among cities and counties in the nine-county

ABAG region for each jurisdiction to use in drafting its housing element. The allocation comes after projection modeling based on current general plan policies, land use designations, and zoning. The allocations are based on “smart growth” assumptions in the modeling and aim to shift development patterns from historical trends (suburban sprawl) toward a better jobs/housing balance, increased preservation of open space, and development of mixed-use, transit-accessible areas. The Regional Housing Needs Allocation (RHNA) is based on an analysis of the available housing stock and vacancy rate in each community, any existing unmet needs for housing, the projected growth in the number of households (population growth and household formation rate), the local and regional distribution of income, and the need for housing generated by local job growth.

### ***Local***

#### *City of Pacifica General Plan 1980*

Following adoption of the 1980 General Plan, the City has updated and amended its housing element several times including in 1983, 1986, 1990, 2007, and most recently in 2015. The City is currently in the process of updating the 2015-2023 Housing Element which must be adopted by January 31, 2023, in compliance with State law. The first community outreach meeting was held in April 2021 and efforts to update the Housing Element are ongoing. Policies included in the current Housing Element 2015-2023 are incorporated into the 1980 General Plan and are further discussed below.

#### *City of Pacifica Housing Element 2015-2023*

The following Housing Element policies are particularly relevant to the proposed project.

- Prioritize in-fill residential development
- Enhance housing affordability through conservation and other strategies
- Provide housing opportunities for all income groups
- Provide a choice of housing types and densities
- Maintain a balanced residential environment with access to employment opportunities, community facilities, and adequate services

#### *Pacifica Municipal Code Title 9, Chapter 4 (Zoning)*

The Pacifica Zoning Ordinance has been amended over time, and most recently in 2021, to address changes to Pacifica’s accessory dwelling unit standards. The Zoning Ordinance provides development standards, identifies allowable land uses, and specifies other regulations related to development within the City. Particularly relevant to the proposed project is Article 22, which regulates the establishment of Planned Development Districts

which are intended to allow diversification of the relationships of buildings and open spaces in planned building groups, while also ensuring compliance with the district regulations and provisions of the Zoning Chapter of the Municipal Code.

Article 47 of the City's Municipal Code establishes requirements for the provision of housing for very low, lower, and moderate-income households for all residential developments of eight or more units, including existing projects where eight or more units will be added. As specified in Section 9-4.4702, at least 15 percent of all units subject to the ordinance must be Below Market Rate (BMR) units restricted for occupancy by very low, lower, or moderate-income households. For areas located outside of the Redevelopment Project Area (adopted pursuant to City Council Ordinance No. 467-86), the first required, and at least 50 percent of the total BMR units must be restricted to occupancy by lower income households. The remaining BMR units shall be restricted to occupancy by moderate income households.

#### *City of Pacifica Design Guidelines*

Pacifica adopted design guidelines in 1990, following the General Plan Community Design Element's recommendation for the establishment of rules to preserve and enhance the character of the City. The Design Guidelines are meant to encourage high-quality and context-sensitive buildings and to encourage creativity in design.

### **4.11.2 ENVIRONMENTAL SETTING**

As noted in the 2015-2023 Housing Element, Pacifica experienced rapid growth in the 1960's, increasing from 20,995 residents in 1960 to 36,020 residents in 1970. From the 1970's on, population increase became more moderate. At General Plan buildout, development was anticipated to result in a total of 15,000 to 17,000 households, representing a net increase of approximately 1,800 to 3,500 households and had an estimated population of between 41,300 to 46,800 residents. The base year population in 1980 was between 38,000 and 39,000 and there were between 13,200 to 13,500 households.<sup>1</sup> As stated in the 2015-2023 Housing Element, the city's population grew 2.2 percent between 1980-1990 and 1.9 percent between 1990-2000. In contrast, the city's population declined by 3 percent between 2000-2010 as shown in Table 4.11-1. At the time of the decennial Census in 2020, the population was 38,640, which is below the anticipated population at General Plan buildout.

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<sup>1</sup> City of Pacifica General Plan 1980, Population and Household Estimates 1960 – 2000 (page 5)



**TABLE 4.11-1: PACIFICA POPULATION RATE OF CHANGE, 1980-2010**

	<b>Population</b>	<b>% Change</b>
<b>1980</b>	36,866	Base
<b>1990</b>	37,670	2.2
<b>2000</b>	38,390	1.9
<b>2010</b>	37,234	-3.0
<b>2020</b>	38,640	3.8

Source: City of Pacifica 2015-2023 Housing Element, Table 1-4, Page 9; U.S. Census Bureau (2020)

As indicated in the Housing Element, there were approximately 14,520 housing units in the city in 2010. Of the total housing units, approximately 80 percent comprised attached and detached single-family residences, and 20 percent comprised multi-family, mobile homes, or other types of units. The average household size in 2010 was 2.65 persons per household as compared to the current rate of 2.86 persons per household<sup>2</sup>, where a household includes persons living alone, family households, and unrelated persons sharing living quarters.

The project would add 70 multi-family dwelling units to a site currently developed with a vacant school complex. The City of Pacifica's RHNA, as described in the 2015-2023 Housing Element, is 413 housing units inclusive of extremely low, very low, low, moderate, and above moderate-income levels. As shown in Table 4.11-2, the City must plan for housing units affordable to a range of income levels including 259 units affordable to moderate income levels or below. According to the 2021 Annual Progress Report published by the California Department of Housing and Community Development,<sup>3</sup> at the end of 2021, the City had permitted 120 units affordable to above moderate-income households and 6 units affordable to moderate-income households, representing an unmet need of 287 units.

**TABLE 4.11-2: REGIONAL HOUSING NEEDS ALLOCATION AND PROGRESS 2014-2022**

	<b>Extremely Low Income</b> <i>30% of Median Income</i>	<b>Very Low Income</b> <i>50% of Median Income</i>	<b>Low Income</b> <i>80% of Median Income</i>	<b>Moderate Income</b> <i>100% of Median Income</i>	<b>Above Moderate Income</b> <i>120% of Median Income</i>	<b>Total</b>
<b>RHNA</b>	60	61	68	70	154	413
<b>Units Permitted</b>	0	0	0	6	120	126

<sup>2</sup> 2015-2019 American Community Survey, U.S. Census Bureau

<sup>3</sup> California Department of Housing and Community Development, Annual Progress Report Permit Summary, 2014-2017, 2018-2021.

The project proposes to construct 70 residential units with the intent of renting at least 45 units to faculty and staff of the Pacifica School District at below market rate rental costs, though not all of these units would be subject to defined rent limits as described further, below. In the event that not all of the 45 units are occupied by faculty and staff of the Pacifica School District, it may make the units available to faculty and staff of nearby school districts, community college districts, or other public employees in the City of Pacifica and surrounding communities. Not more than 25 units in the project would be leased to market rate tenants including those who are not faculty or staff of any school district, community college district, or other public employees in the City of Pacifica or surrounding communities.

Pursuant to the City's Inclusionary Housing Ordinance, a minimum of 15 percent of the total units are required to be affordable to below market rate households, with the first BMR unit and at least 50 percent of the total required BMR units affordable to lower income households. Of the 11 BMR units required, six are designated for occupancy by low-income households and five for moderate income households. As stated above, the remaining units are anticipated to be provided as workforce housing to households at moderate income levels or below though no formal mechanism is proposed to restrict rents except for the 11 units subject to the City's Inclusionary Housing Ordinance.

Using the current 2.86 persons per household figure published by the U.S. Census Bureau, the 70-unit development would be expected to introduce approximately 200 people to the project site.

#### **4.11.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, a project would result in a significant impact to population and housing if it would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

#### **4.11.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

Impacts to population and housing resulting from implementation of the proposed project are discussed below. Impacts to population and housing are assessed using the significance criteria listed in section 4.11.3, above. This analysis identifies the potential direct and indirect

impacts to population and housing resulting from implementation of the proposed project.

***Impact POP-1: The project would not induce direct substantial population growth in the area as a result of construction of the proposed units, nor would the project result in indirect population growth in the area as a result of expansion of public facilities, such as roads or other infrastructure (less than significant impact).***

The proposed project would introduce 70 residential units to the site which currently contains a vacant elementary school. The site is currently designated Low Density Residential in the City's General Plan and zoned Single Family Residential (R-1). In 1965, a subdivision map was recorded for the site which allowed for development of 56 single-family residences on individual lots as well as construction of four dead end roads which would provide access to the residences from Oddstad Boulevard. However, following recordation of the subdivision, the existing school complex was constructed, and the development of the 56-lot single-family subdivision and associated improvements were not initiated. The proposed project would vacate the public rights-of-way and easements on the subdivision map and would instead record a new map with three individual lots as shown on the plans submitted for development. The proposed project would result in 14 additional units beyond the previously proposed 56-lot single-family subdivision. The City's current population of 38,640 people is below the range of anticipated population at General Plan buildout (41,300 to 46,800 people). Assuming an average household size of 2.86, the introduction of 70 housing units would result in approximately 200 new residents. With the addition of 200 residents through construction of the project, the City's new population (38,840) would still be below the General Plan buildout (41,300 to 46,800). Additionally, the project would diversify and add to the City's existing housing inventory and would help to meet the City's RHNA across a variety of income levels as identified in the Housing Element. Therefore, the project would not result in direct substantial unplanned population growth and impacts would be less than significant.

As noted on page 33 of the 1980 General Plan, when an educational use is discontinued, proposed uses should be compatible with adjacent residential uses, existing recreational facilities should remain available for use by the surrounding neighborhood, and the land use of the site should be redesignated to ensure consistency and compatibility with the existing adjacent land uses. As proposed, the project will rezone the site from R-1 to Planned Development District (P-D), allowing for development of the proposed project consistent with its General Plan land use designation, which in turn is consistent and compatible with the existing adjacent land uses. The General Plan and Zoning designations are consistent

with the surrounding area and current water, sewer, storm drain, and transportation infrastructure are sufficient to serve the proposed development. Moreover, water and sewer providers have issued will-serve letters stating there is existing capacity in the systems to serve the site. As such, the project will not indirectly induce population growth through the extension of utilities or roads and impacts of the proposed project would be less than significant.

***Impact POP-2: The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (less than significant impact).***

The project site is currently developed with a school complex that is vacant and would not displace any housing units or people, necessitating the need for construction of replacement housing elsewhere. The proposed project implements the City's Housing Element by adding 70 new multi-family dwellings to the existing housing stock within Pacifica and will comply with the City's Inclusionary Housing Ordinance, which requires a minimum of 15 percent BMR units, including units affordable to lower income households. The School District intends to provide housing units to households at moderate income levels and below, with a maximum of 25 units potentially leased to market-rate households. As such, the project will fulfill affordable housing needs for School District faculty and staff and will result in less than significant impacts due to the displacement of people or existing housing.

#### **4.11.5 REFERENCES**

1. Park Pacifica Highlands No. 1, Pacifica California. Office of the Recorder in the County of San Mateo, State of California. October 5, 1965. Book 63 of Maps, Pages 13-15.



## 4.12 PUBLIC SERVICES

This section summarizes the regulatory framework for evaluating public services, including fire protection, police, schools, and libraries, describes the existing conditions for availability of public services, and analyzes the project's potential to impact public services within the City of Pacifica.

### 4.12.1 REGULATORY CONTEXT

#### **State**

##### *California Office of Emergency Services*

The California Office of Emergency Service (OES) provides the basis for local emergency preparedness under the authority of the California Emergency Services Act of 1970. The Office of Emergency Services is responsible for preparing the California State Emergency Plan, last published in October 2017, and for coordinating and supporting emergency services conducted by local governments. The responsibility for immediate response to an emergency, such as fires, landslides, earthquakes or riots, rests with local government agencies and segments of the private sector, with support services provided by other jurisdictions and/or state and federal agencies. In accordance with their normal operating procedures, the initial response to an emergency will be made by local Fire, Law Enforcement, Medical or Maintenance (Public Works) districts or departments.

##### *California Fire Code*

The California Fire Code (CFC) establishes the minimum requirements consistent with nationally recognized practices to safeguard life and property from the hazards of fire, explosion, or dangerous conditions in the use of buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency response personnel during emergency operations. The provisions of the CFC apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, location, maintenance, and removal and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.<sup>1</sup>

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<sup>1</sup> 2019 California Fire Code, Chapter 1, Division 1, Section 1.1.3

### *California Health and Safety Code*

State fire and fire protection regulations are set forth in Sections 13000 et seq. of the California Code, Health and Safety Code: Fires and Fire Protection. This includes, but is not limited to, regulations for building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise structure and childcare facility standards, and fire suppression training.

### *California Code of Regulations*

The California Code of Regulations, Title 5: Education Code, governs all aspects of education within the state. These standards include, but are not limited to, teachers' retirement system and compensation, California community colleges, and all standards governing the California Department of Education.

### *California State Assembly Bill 2926 - School Facilities Act of 1986*

In 1986, AB 2926, entitled the School Facilities Act of 1986, which was enacted by the state of California and added to the California Code, Government Code, Section 65995. It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees, adjustable for inflation, which may be collected under this legislation and any other school fee authorization, of \$1.50 per square foot (\$1.50/sf) of residential development and \$0.25/sf of commercial and industrial space. The maximum fee adjusted for inflation as of January 2020 is \$4.08/sf and \$0.66/sf for commercial and industrial space.

AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the California Code, Government Code. Under this statute, payment of statutory fees by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities. Subsequent legislative actions have expanded and contracted the provisions and limits placed on school fees by AB 2926.

### *California Senate Bill 50*

Further refinement of the legislation enacted under AB 2926 took place in the passage of Senate Bill 50 (SB 50) in 1998, which defined the Needs Analysis process in California Code, Government Code Sections 65995.5–65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. Level One fees are assessed based upon the proposed square footage of



residential, commercial, industrial, and/or parking structure land uses. Level Two fees require the developer to provide one-half of the costs of accommodating students in new schools, while the state would provide the other half. Level Three fees require the developer to pay the full cost of accommodating the students in new schools and would be implemented at the time the funds available from Proposition 1A (approved by California voters in 1998) are expended. School districts must demonstrate to the state their long-term facilities' needs and costs based on long-term population growth to qualify for this source of funding. However, voter approval of Proposition 55 on March 2, 2004, precludes the imposition of the Level Three fees for the foreseeable future. Therefore, once qualified, districts may impose only Level Two fees, as calculated according to SB 50.

#### *The Mello-Roos Communities Facilities Act*

The Mello-Roos Community Facilities Act of 1982, California Code, Government Code Section 53311 et seq., provides an alternative method of financing certain public capital facilities and services through a special property tax. This empowers local agencies to establish Community Facilities Districts to levy special taxes for facilities for public infrastructure such as roads, schools, and libraries. The creation of a Mello-Roos District requires the approval of two-thirds of the registered voters within the proposed District which would benefit from the applied infrastructure.

### **Local**

#### *County and Local Emergency Response*

The San Mateo County Department of Emergency Management (DEM) coordinates countywide preparedness, response and protection services and activities for large-scale incidents and disasters. The DEM is responsible for alerting and notifying appropriate agencies within the County's 20 cities when disaster strikes; coordinating all agencies that respond; ensuring resources are available and mobilized in times of disaster; developing plans and procedures in response to and recovery from disasters; and developing and providing preparedness materials for residents. The Pacifica Police Department is responsible for the preparation and maintenance of an operational emergency management plan for all city departments' use in managing a major disaster.

#### *2021 Multijurisdictional Local Hazard Mitigation Plan*

As detailed in previous sections of this EIR, the City of Pacifica, in conjunction with the County of San Mateo and other cities and special districts in the County, prepared an update to the Multi-jurisdictional Local Hazard Mitigation Plan, which was adopted by the Pacifica City

Council on November 22, 2021. As detailed in the Plan, transportation isolation and accessibility in the event of an emergency evacuation is identified as a vulnerability in Pacifica, and particularly along arterials, bridges over highways, and single-entry neighborhoods.

#### *North County Fire Authority*

The North County Fire Authority (NCFA) provides fire and life safety services to the cities of Pacifica, Daly City, and Brisbane. Among others, the NCFA is responsible for reviewing development proposals for compliance with the California Fire Code as well as conducting review of vegetation management and reduction strategies for areas located in fire-prone areas. As detailed in the 2020 Annual Report, the majority of emergency calls were medical related and the average response time was 5 minutes, 42 seconds.<sup>2</sup>

#### *Pacifica Police Department*

The City of Pacifica Police Department (PPD) provides law enforcement services in the City and is comprised of the Field Services, Investigations, and Communications and Records divisions. According to 2016 annual report, the Field Services division is the largest division of the Police Department and is staffed by a captain, sergeants, corporals, officers, community service officers, and volunteer assistants. The division's primary function is to provide uniformed patrol services, but it is also comprised of several special units.

#### *Pacifica General Plan 1980*

The Pacifica General Plan includes the following relevant policies and action programs that seek to reduce or avoid impacts to public services:

- Open Space Element
  - ♦ Retain open space which preserves natural resources, protects visual amenities, prevents inappropriate development, provides for the managed use of resources, and protects the public health and safety.
  - ♦ Provide outdoor recreation in local parks, open space, and school playgrounds in keeping with the need, scale and character of the City and of each neighborhood.
  - ♦ Encourage development plans which protect or provide generous open space appropriately landscaped. Balance open space, development and public safety, particularly in the hillside areas.

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<sup>2</sup> 2020 Annual Report, North County Fire Authority.

- Community Facilities Element
  - ♦ Maintain and improve the present level of City services.
  - ♦ Provide recreational activities and facilities consistent with user financial and environmental constraints.
  - ♦ Continue to seek cost effective ways to provide least cost garbage collection and disposal.
  - ♦ Encourage the school districts to find alternative uses for unused facilities which are compatible with existing neighborhoods, continue neighborhood accessibility to recreation facilities located on school grounds, and maintain at least its current level of staffing, programming and cooperation with the City. Future expansion of services to meet changing needs should also be encouraged

#### *Pacifica Municipal Code*

Title 9: Planning and Zoning adopts the City's land use and development codes and establishes local procedural requirements and permitting procedure. Title 8: Building Regulations adopts the 2019 California Building, Mechanical, Plumbing, Electrical, Energy, Green Building, and Residential Codes by reference and establishes local procedural requirements and permit fees. Title 4, Chapter 3: Fire Protection adopts the 2019 California Fire Code by reference and establishes the duties of the local department.

#### **4.12.2 ENVIRONMENTAL SETTING**

As stated above, the 1980 Pacifica General Plan identifies policies and action programs in the Community Facilities Element which intend to address the expansion and maintenance of City services, including finding a suitable location for the Police Department and development of a new Civic Center location. The Community Services Element also provides information for wastewater capacity and treatment, solid waste, school services, libraries, and recreation opportunities, and directs the City to maintain an emergency plan which provides adequate response to disasters.

#### ***Fire Protection***

Major fire hazards in Pacifica include wildland fires, steep terrain, narrow streets, and increasing costs of fire suppression. The project site is classified as having a moderate fire hazard within the Local Responsibility Area (LRA) and is located adjacent to steep, undeveloped hillside designated as wildland urban interface area (WUI) by the North County Fire Authority.

As discussed previously, fire protection and medical emergency services in Pacifica are provided by the NCFA. Two of the NCFA's nine fire companies are in Pacifica and include Fire

Station 71, at 616 Edgemar Avenue, which serves the north end of Pacifica, and Fire Station 72, at 1100 Linda Mar Boulevard, which serves the south end of Pacifica, including the project site. NCFA maintains response time standards for all stations including four to eight minutes for fire response and under seven minutes for emergency medical response. The NCFA Support and Administrative Services Bureau is responsible for overall management and coordination of the department's 150 employees and resources that support the organization. This includes oversight of maintenance and repair of the fleet and small equipment, facilities and grounds, communications equipment, and breathing apparatus, inventory control of supplies including personal protective equipment, and oversight of strategic planning, department policy and procedures, rules and regulations, and implementation of various special community programs. Duties covered by the Support and Administrative Services Bureau supports response time standards for NCFA stations, including for Station 72, which is nearest to the project site.

### ***Police Protection***

Among other responsibilities, the Pacifica Police Department is responsible for responding to public safety calls and providing traffic safety and security for public events. According to the most recent published annual report, the PPD responded to approximately 18,400 calls for service in 2016.<sup>3</sup> PPD provides dispatch services during evenings and weekends for the Department of Public Works and the North Coast County Water District (NCCWD) and participates when needed in the North San Mateo County Gang Task Force and the San Mateo Narcotics Task Force. The Department has assigned officers to schools to strengthen relationships between schools, students, and police in the City. PPD serves the City from the police station location at 2075 Coast Highway. In 2018, the average response times between dispatch and officer arrival were between approximately three and six minutes, depending on the urgency of the call, as emergency calls take precedence. PPD response time standards state that officers shall respond without delay to all calls for police assistance as soon as possible consistent with normal safety precautions and vehicle laws.

### ***Schools***

Pacifica School District (PSD) provides oversight and resources for eight schools and school programs within the district, including three K-8 schools: Ocean Shore, Vallemar, and Cabrillo, two K-5 elementary schools: Ortega and Sunset Ridge, one middle school: Ingrid B

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<sup>3</sup> Pacifica Police Department, Annual Report 2016, page 5

Lacy, and homeschooling resources through the PSD Homeschool Program and the Linda Mar Educational Center, which provides pre-school and Kindergarten classes, special education, and support space for home-schooled children. Due to underutilization and decreasing enrollment levels, the PSD closed three school facilities including Linda Mar, Fairmont, and Oddstad<sup>4</sup> schools. According to the California Department of Education, during the 2020-2021 academic year, the PSD enrolled 3,006 students in kindergarten through 8<sup>th</sup> grade.<sup>5</sup> The 2020-2021 academic year represents the PSD's lowest enrollment, whereas the highest enrollment year was 2015-2016 with approximately 3,205 students.

Jefferson Union High School District (JUHSD) enrolls 4,705 high school and high-school equivalent students from Brisbane, Colma, Daly City, and Pacifica. The district has two high schools in Pacifica including Terra Nova High School in the Park Pacifica neighborhood which had an enrollment of 746 students in the 2020-2021 school year and Oceana High School, an alternative college preparatory program in East Sharp Park, which enrolled 596 students in the 2020-2021 school year. JUHSD offers open enrollment at all schools, allowing students to enroll at the school of their choice. Students from outside Pacifica attend high school in Pacifica, and Pacifica students also attend high school in Daly City. Both Oceana and Terra Nova high schools have large campuses (56 acres and 43 acres, respectively) with football and soccer fields, baseball diamonds, tracks, tennis courts, and auditoriums. The facilities are adequate to handle current enrollment, and significant excess capacity exists at Oceana and Terra Nova.

In addition to public schools provided by PSD and JUHSD, there are three private schools in the Planning Area including Pacific Bay Christian School, founded in 1950 in the Linda Mar neighborhood, Good Shepherd School, established in 1968 by Good Shepherd Catholic Church in East Sharp Park, and Montessori School of Linda Mar, which was established in 1977.

### ***Parks***

Within the City of Pacifica, there are district, neighborhood, and pocket parks, as well as special facilities and school playfields that provide a variety of recreational opportunities within the city. Frontierland Park, identified as a district park, covers a 63-acre area at the eastern edge of the Park Pacifica neighborhood and is located directly adjacent to the project

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<sup>4</sup> The subject site of the Project.

<sup>5</sup> California Department of Education Data Quest, Enrollment Multi-Year Summary by Grade, Academic Year 2020-21, <https://dq.cde.ca.gov/dataquest/>, accessed March 11, 2022.

site. Frontierland Park provides a range of amenities including a reservable picnic area with ten tables, a counter prep area, two large barbeque pits, a sink with running water, and electrical connections. The park also has sports fields, a fitness court, a children's play area, and undeveloped hillside land.

Pacifica has six neighborhood parks ranging in size from about four to twenty acres for a total of 55 acres and include Fairmont West Park, Fairmont Park, Imperial Park, Fairway Park, Oddstad Park and Sanchez Park. Oddstad Park and Sanchez Park are nearest to the project site at approximately 1.6 and 1.8 miles, respectively. Eleven pocket parks with playlots or public use areas serving the immediate vicinity are located throughout the City and range from 0.1 to 2 acres in size.

Other recreational facilities in Pacifica include the Beach Boulevard Promenade, Pacifica Municipal Pier, and Grace McCarthy Vista Point, offering running, fishing, scenic viewing, and picnic areas by the ocean. In addition, the Pacifica Skate Park located adjacent to the Pacifica Community Center on Crespi Drive offers recreation for skateboarding and roller skating. The City also relies on the school districts for recreational facilities, such as tennis courts, baseball/softball fields, soccer fields, football fields, gymnasiums, tracks, and the pool at the Jean E. Brink Pool at Oceana High School, home to the City of Pacifica's aquatics program. Furthermore, the recreational fields on the project site are also publicly accessible for recreational activities, and as discussed throughout this EIR, the southern recreational field will be retained as part of the project.

### ***Other Public Facilities***

Two libraries are located within the City of Pacifica and include the Pacifica Sharp library located in West Sharp Park serving northern portions of the city and the Pacifica Sanchez library adjacent to the Park Mall shopping center serving southern portions of the city. The Pacifica Sanchez library, located at 1111 Terra Nova Boulevard, is approximately 0.4 miles from the project site. Library services are provided by San Mateo County Libraries (SMCL) which manages 12 branch libraries across incorporated and unincorporated San Mateo County. As presented in the 2020-2021 annual report, SMCL has a service population of 283,997 people, or approximately 37 percent of the county's total population.<sup>6</sup>

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<sup>6</sup> San Mateo County Libraries, Open for Exploration, Annual Report, 2020-2021

### 4.12.3 THRESHOLDS OF SIGNIFICANCE

As provided in Appendix G of the CEQA Guidelines, the project would result in a significant impact to public services if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
  - ♦ Fire protection
  - ♦ Police protection
  - ♦ Schools
  - ♦ Parks
  - ♦ Other public facilities

### 4.12.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES

Impacts to public services resulting from implementation of the proposed Project are discussed below. The following impact analysis is based on the existing concentration and availability of public services and the increased level of demand that would result from the project.

***Impact PS-1: The project would not require expansion or construction of new governmental facilities which could result in substantial adverse physical impacts as a result of increased demand for fire protection, police protection, schools, parks, or other public facilities (less than significant).***

The project site is located in the Park Pacifica neighborhood on an underutilized site that now contains a vacant school facility and is well served by all public services. The increase in population at the project site resulting from the construction and operation of 70 dwelling units will incrementally increase demands for public services. However, these increased demands were anticipated at General Plan buildout which estimated a population of 41,300 to 46,800 by the year 2000, whereas the city's current population is approximately 38,330, which is less than anticipated under the General Plan.

#### *Fire and Police Protection*

As previously discussed, the North County Fire Authority oversees and manages two fire stations within Pacifica, including Station 72 located approximately 1.6 miles from the project



site at 1100 Linda Mar Boulevard which is within the four-minute response time identified by the NCFA. The City of Pacifica Police Department, located at 2075 Coast Highway serves the entirety of the community and includes the Field Services, Investigations, Communications, and Records Divisions, providing crime prevention, crisis intervention, safety awareness, and natural disaster preparedness awareness service. The development of 70 residences will not significantly increase the number of service calls nor will it impact the ability of fire and police protection services to maintain existing levels of service to the community.

Furthermore, the project will be required to comply with applicable building and fire codes that are intended to reduce risks associated with construction in fire-prone areas including requirements contained in Chapter 7A of the California Building Code which establishes regulations related to vegetation management, non-combustible materials, and the location of vents, among other requirements, which are intended to increase fire resistance of buildings located within the WUI. As such, the project would not necessitate expansion of existing facilities nor construction of new fire or police stations which could result in substantial adverse physical impacts to the environment and therefore impacts of the project would be less than significant.

#### *Public Schools*

As identified in the Level I Developer Fee Study prepared in 2018, the Pacifica School District has a student generation factor of 0.5 which is based on statewide averages calculated by the Office of Public School Construction.<sup>7</sup> The Level I Developer Fee Study prepared in 2020 for the Jefferson Union High School District states that the student generation factor for grades 9–12 for multi-family developments is 0.11. The project includes 70 residential units and would therefore be expected to generate 35 K-8 students and 8 students in grades 9-12. The 35 K-8 students generated by the project is within the 2,725-student capacity noted in the 2018 Fee Study, and therefore the addition of 35 students to PSD schools in Pacifica will not necessitate the expansion or construction of new school facilities. The 2020 Fee Study prepared for the JUHSD does not include existing capacity. However, as noted in the 2020 Fee Study the addition of residential development requires payment of fees to fund the JUHSD costs to replace or modernize facilities for students generated from planned future development. Furthermore, population growth within the city is anticipated under the General Plan and new development is required to pay its fair share of impact mitigation fees

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<sup>7</sup> Jack Schreder & Associates, Incl., Level I Developer Fee Study for Pacifica School District, June 14, 2018, page 8.

to offset impacts to school facilities. The project will be required to pay applicable school impact fees to ensure school facilities can accommodate increased enrollment associated with student-aged population introduced by the project. As such the project would not necessitate expansion or construction of new school facilities which could result in substantial adverse physical impacts to the environment and therefore impacts of the project would be less than significant.

#### *Parks*

The project would not result in substantial adverse effects to existing park facilities. The adjacent 63-acre Frontierland Park and approximately five-acre recreational field at the southern portion of the project site provide open space recreation opportunities to project residents as well as areas surrounding the project site. The addition of 70 residential units to the site will not increase use of these facilities to the degree of necessitating construction of additional facilities elsewhere in the city. Furthermore, the project will provide a minimum of 1.4 acres of parkland in perpetuity, pursuant to parkland dedication requirements contained in Title 10, Chapter 1, Article 8 of the PMC. The dedication of parkland in perpetuity will satisfy the parkland needs of the development's occupants and therefore, will not necessitate the expansion or construction of new parks that could result in substantial adverse physical impacts to the environment and therefore impacts of the project would be less than significant.

#### *Other Public Facilities*

The project will not result in substantial adverse impacts associated with any other public facilities. The project site is within a developed area that is well served by existing public services and the project is within development anticipated at General Plan buildout. The project will not generate a substantial increase in demands that warrant the expansion or construction of new public facilities and as such impacts of the project would be less than significant.

#### *Conclusion*

While the project would result in an incremental increase in the demand for public services in the Planning Area, the growth has been envisioned by the General Plan and the project is required to comply with the requirements of the General Plan and Pacifica Municipal Code that ensure that public services are adequately funded. In addition, the project would be required to pay school impact fees adopted by the Pacifica School District and Jefferson Union High School District. Therefore, for the reasons discussed above, impacts of the

project on public services including fire and police protection, schools, parks, and other public facilities would be less than significant.

#### **4.12.5 REFERENCES**

1. 2019 California Fire Code, Chapter 1, Division 1, Section 1.1.3
2. California Code, Health and Safety Code, Sections 13000 et seq.: Fires and Fire Protection
3. California Code of Regulations, Title 5: Education Code
4. California Code, Government Code, Section 65995 et seq.: Payment of Fees, Charges, Dedications, or Other Requirements Against a Development Project
5. California Code, Government Code, Section 66000 et seq.: Fees for Development Projects
6. California Code, Government Code, Section 53311 et seq.: The Mello-Roos Community Facilities Act of 1982
7. California Department of Education Data Quest, Enrollment Multi-Year Summary by Grade, Academic Year 2020-21, <https://dq.cde.ca.gov/dataquest/>, accessed March 11, 2022
8. Jack Schreder & Associates, Inc., Level I Developer Fee Study for Pacifica School District, June 14, 2018
9. Jack Schreder & Associates, Inc., Level I Developer Fee Study for Jefferson Union High School District, July 28, 2020
10. San Mateo County Libraries, Open for Exploration, Annual Report, 2020-2021
11. North County Fire Authority, 2020 Annual Report
12. Pacifica Police Department, Annual Report 2016

## 4.13 TRANSPORTATION AND TRAFFIC

This section summarizes the regulatory framework for evaluating transportation, summarizes the existing transportation network, and discusses the potential impacts resulting from implementation of the proposed project. The following documents were used to analyze the potential impacts that could occur:

- Traffic Analysis, prepared by Hexagon Transportation Consultants, Inc., July 27, 2022

### 4.13.1 REGULATORY CONTEXT

#### ***State***

##### *Assembly Bill 1358*

On September 30, 2008, Governor Schwarzenegger signed Assembly Bill 1358 (AB 1358), the California Complete Streets Act of 2008, into law. As of January 2011, AB 1358 requires any substantive revision of the circulation element of a city or county's general plan to identify how the circulation of all roadway users including pedestrians, bicyclists, children, seniors, individuals with disabilities, and transit riders, as well as motorists will be safely accommodated.

##### *Senate Bill 375*

As previously discussed in Section 4.8 Greenhouse Gas Emissions, Senate Bill 375 (SB 375) was adopted to enhance the GHG reduction goals outlined in AB 32 by establishing GHG reduction targets from passenger vehicles. Among others, SB 375 requires preparation and adoption of a Sustainable Communities Strategy (SCS) that contains a growth strategy to meet emission targets for inclusion in the Regional Transportation Plan (RTP). The SCS and RTP must be consistent with one other, including action items and financing decisions. Metropolitan Planning Organizations (MPOs) must use transportation and air emissions modeling techniques that are consistent with guidelines prepared by the California Transportation Commission. The current RTP, Plan Bay Area 2050, is further described below.

##### *Senate Bill 743*

SB 743 was signed into law by Governor Jerry Brown and changes how transportation impacts are evaluated under CEQA. Under SB 743, lead agencies are required to evaluate transportation impacts of a project using a vehicle miles traveled (VMT) metric which focuses on balancing the needs of congestion management with statewide goals related to infill

development, promotion of public health through increased active transportation facilitated by closer proximity to alternative travel modes and reduces greenhouse gas emissions. Though SB 743 was signed into law in 2013, jurisdictions were not mandated to evaluate project impacts using the VMT metric until July 1, 2020. In December 2018, the California Governor's Office of Planning and Research (OPR) published the Technical Advisory on Evaluating Transportation Impacts in CEQA, which provides guidelines for evaluating a project's transportation impact using a VMT metric. Pursuant to Government Code Section 15064.3(b), lead agencies have discretion to select the most appropriate methodology for evaluating a project's VMT impacts. The City's established VMT significance thresholds for environmental review purposes are consistent with that provided in OPR's Technical Advisory.

### ***Regional***

#### *Regional Transportation Plan (Plan Bay Area)*

On October 21, 2021, the Metropolitan Transportation Commission (MTC) and the Executive Board of the Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050 and certified the associated Final EIR. Plan Bay Area 2050 builds upon the previously adopted Plan Bay Area 2040 and serves as both the region's SCS and the RTP. Plan Bay Area 2050 is an integrated long-range transportation and land-use/housing plan intended to support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution in the Bay Area. The Plan identifies 35 strategies across four elements (housing, economy, transportation, and the environment). Transportation strategies are categorized into three themes: maintain and optimize the existing transportation system, create health and safe streets, and build a next-generation transit network.

### ***Local***

#### *San Mateo Countywide Transportation Plan*

The San Mateo Countywide Transportation Plan, adopted by the City/County Association of Governments (C/CAG) on February 9, 2017 is intended to provide a long-range, comprehensive approach to transportation planning in the county and has a central vision of providing an economically, environmentally, and socially sustainable transportation system that offers practical travel choices, enhances public health through changes in the built environment, and fosters inter-jurisdictional cooperation. While Plan Bay Area provides for regional transportation planning including funding over the next twenty years, the San

Mateo Countywide Plan serves as the basis for the county's portion of the RTP. The Countywide Transportation Plan is also reviewed by MTC to ensure consistency with the RTP.

#### *San Mateo County Congestion Management Program*

As the designated Congestion Management Agency for San Mateo County, C/CAG is primarily responsible for administering the State-mandated Congestion Management Program (CMP). C/CAG-designated CMP roadway system components in Pacifica include Highway 1 and Skyline Boulevard. Level of service (LOS) is a qualitative description of intersection operations with LOS A representing a roadway facility with excess capacity and vehicles experience little or no delay to LOS F which represents a volume of vehicles that exceeds the roadway capacity, resulting in long queues and excessive delays. LOS standards for intersections on the CMP roadway network in Pacifica are LOS E or better, which represents "at-capacity" conditions.

As applicable to the Project, the CMP sets forth policy direction to assess the cumulative traffic impacts on the CMP roadway network. For development projects, the CMP sets forth that the project sponsor shall comply with the Land Use Impact Analysis Program guidelines in the latest Congestion Management Program CMP for San Mateo County. Appendix I of the CMP states that projects generating less than 100 trips during the a.m. or p.m. peak hour are not subject to CMP land use guidelines.

#### *City of Pacifica General Plan 1980*

The Circulation Element of the General Plan establishes goals, policies, and actions for developing and maintaining the city's transportation system. Circulation Element policies and action programs particularly relevant to the project include the following:

- Provide access which is safe and consistent with the level of development.
- Ensure adequate off-street parking in all development.
- Promote orderly growth in land uses and circulation.
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#### *Bicycle and Pedestrian Master Plan*

The City of Pacifica Bicycle and Pedestrian Master Plan, adopted February 2020, establishes the City's long-term vision for improving walking and bicycling in Pacifica through policy, program, and project recommendations. The goals of the plan include making walking and bicycling safer, increasing connectivity, prioritizing improvements for safe routes to schools, and creating a culture of walking and biking within Pacifica. Recommended bicycle facilities, shown on Figure 9 of the Plan, were developed based on a variety of factors including street

width, lane configuration, parking, adjacent land uses, terrain, nearby destinations, public and Parks, Beaches, and Recreation Commission feedback, and the desire to connect existing and proposed facilities. Recommended pedestrian facilities, shown on Figure 14 of the Plan, are based on a review of individual intersections, experiences described in public comments, current infrastructure, and street context. Recommendations are intended to enhance street crossings by shortening crossing distances, increasing the visibility of pedestrians, and increasing driver awareness of the potential for crossing pedestrians.

#### **4.13.2 ENVIRONMENTAL SETTING**

##### ***Roadway Network***

The City of Pacifica is served by highway, arterial, collector, and local roadways. Regional roadway access to Pacifica is provided by Highway 1, which is situated along the western portion of the city, adjacent to the Pacific Ocean. Arterial roadways are classified as wider streets accommodating higher volumes of traffic and providing access to the highway and other destinations within the city. Within the vicinity of the project site arterials include Terra Nova Boulevard, Linda Mar Boulevard, and Fassler Avenue. Collector roadways are classified as lower speed streets that provide connections between local streets and arterial roadways. Oddstad Boulevard provides direct access to the project site and is classified as a collector. Local roadways are low volume streets that provide access to adjacent land uses and are not intended for long distance travel. Adjacent to the project site, Big Bend Drive and Yosemite Drive are classified as local roadways.

##### ***Transit Services***

San Mateo County Transit District (SamTrans) provides regional transit service throughout San Mateo County and into adjacent counties including north to San Francisco and south to Palo Alto and regularly considers updates to its routes and services. Within Pacifica, SamTrans provides local service to retail and other services and schools, as well as providing links to regional transit services including BART and Caltrain. SamTrans routes serving the city include 14, 19, 49, 110, and 112. The nearest bus stop to the project site is located approximately 0.5 miles south at the corner of Oddstad Boulevard and Terra Nova Boulevard. From this location, access to Routes 14, 19, and 110 are provided. Route 14 provides looped service to the Linda Mar Shopping Center, Ortega School, Oddstad City Park, and Terra Nova High School. Route 14 operates seven days a week with 30-to-90-minute headways. Route 19 provides access to Ingrid B. Lacy School, Terra Nova High School, and the Linda Mar Park and Ride, operating Monday through Friday during the school morning



and afternoon pick-up and drop-off times. Route 110 provides access north to the Daly City BART station, operating seven days a week with one hour to one and a half hour headways.

### ***Bicycle and Pedestrian Facilities***

Within the city, there are existing Class I (bike paths and trails), Class II (on-street bike lanes), and Class III (bike routes shared with autos) bicycle facilities. Near the project site, Class II facilities are provided on Oddstad Boulevard and Linda Mar Boulevard, and Class III shared bike routes are located along Terra Nova Boulevard. Sidewalks are provided along Oddstad Boulevard and nearby intersections including Oddstad Boulevard/Big Bend Drive, Oddstad Boulevard/Yosemite Drive, and Oddstad Boulevard/Terra Nova Boulevard are four-way stop controlled intersections with crosswalks provided at each leg.

### ***Traffic Analysis***

A Traffic Analysis was prepared by Hexagon Transportation Consultants, Inc., dated July 27, 2022 (Appendix 4.13-A) to analyze potential impacts associated with development of the proposed Pacifica School District Workforce Housing project. The Analysis includes a discussion of the project's estimated vehicle miles traveled, surrounding roadway operations, and site access and circulation.

### ***Vehicle Miles Traveled***

As discussed previously, the city's VMT guidelines are consistent with the methodology contained in OPR's Technical Advisory. As discussed in the Traffic Analysis, the project's VMT was estimated using the home-based trip, which accounts for the primary trip, generally referring to commute trips. The home-based trip was utilized in the analysis as most residents' primary trips were presumed to be commute trips to Pacifica School District (PSD) schools, other nearby schools, and other jobs in and around the City of Pacifica. As proposed, 45 units will be leased at below market rate to employees of the Pacifica School District (44 units) and one unit dedicated for an on-site property manager. The remaining 25 units would be leased to market rate tenants who are not employees of the Pacifica School District.

Home-based trip lengths were calculated for units rented to employees of the Pacifica School District, one on-site property manager, and market rate tenants. For the purposes of estimating the project's estimated VMT, it is assumed that each unit will be occupied by two driving-age residents for a total of 140 individuals driving to and from the site. Since the analysis considers 45 units are restricted to PSD employees, it is assumed that half the trips would go to a PSD site and the other half of trips would go to non-PSD sites. The number of

residents was not assumed to be critical for the VMT analysis since an average VMT per capita was used. Estimated VMT for the project is further detailed in the Traffic Analysis and discussed in further detail in the impact analysis below.

#### *Roadway Operations*

Following the passage of SB 743 level of service (LOS) is no longer used in the determination of environmental impacts, rather, CEQA requires evaluation of a project's VMT, which focuses on balancing the needs of congestion management with statewide goals related to infill development, promotion of public health through increased active transportation facilitated by closer proximity to alternative travel modes, and the reduction of greenhouse gas emissions. As specified above, the City of Pacifica strives to maintain LOS D for vehicles during peak periods. Though LOS is not used to determine the significance of environmental impacts, the Traffic Analysis provides an analysis of LOS for informational purposes as well as to determine the project's consistency with adopted LOS policies contained in the General Plan<sup>1</sup>.

As detailed in the Analysis, Oddstad Boulevard is expected to operate substantially below capacity due to its location in a single-family residential area that does not contain high traffic-generating land uses. Oddstad Boulevard is a two-lane residential collector street serving the city's southeast residential areas. Roadways such as Oddstad Boulevard typically have a maximum capacity of 12,000 vehicles per day.

The traffic study evaluated four study intersections along Oddstad Boulevard including Linda Mar Boulevard, Terra Nova Boulevard, Yosemite Drive, and Big Bend Drive. Existing AM and PM peak-hour traffic volumes were collected in February and March 2022 as part of the Analysis. A comparison of new counts and pre-COVID counts found that traffic volumes have returned to normal (pre-COVID) conditions. The introduction of 70 residential units at the project site would add an estimated 484 daily trips, which equates to approximately four percent of the capacity of Oddstad Boulevard. The Traffic Analysis analyzed level of service under existing, existing plus project, background, and background plus project conditions where existing conditions reflect existing traffic operations and background conditions consider existing conditions plus planned developments in the vicinity<sup>2</sup>, including the 36

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<sup>1</sup> The 2040 General Plan, adopted July 11, 2022, contains LOS policies. The 1980 General Plan, which is applicable to the project pursuant to state law based on when the tentative subdivision map was deemed complete, does not contain express LOS policies.

<sup>2</sup> Discussion of these planned development applications are included in this EIR for environmental review purposes only as required by CEQA. These projects have not been approved by the City Council and will undergo the City's discretionary review

townhome units in the Hillside Meadows Subdivision and 125 single family homes in the Linda Mar Woods Subdivision. The results of the Analysis indicate that under all scenarios, study intersections would operate at an acceptable level of service (i.e., LOS D or better) with study intersections continuing to operate at LOS A or LOS B with the addition of the project.

#### *Site Access, Circulation, and Parking*

Vehicular access will be provided through a new driveway located 100 feet north of the existing school driveway on Oddstad Boulevard. The proposed driveway will be 25 feet in width for two-way traffic, and the existing driveway will be removed as part of the project. The proposed driveway leads to interior drive aisles that connect to surface parking lot areas and parking spaces at the residences.

The project proposes 142 parking spaces for the proposed 32 one-bedroom units and 38 two-/three-bedroom units which complies with the city's requirement of 1.5 spaces for each one-bedroom unit, 2 spaces for each two or three-bedroom unit, and 0.25 guest spaces per unit. The city does not have a bicycle parking standard for residential projects, however the project proposes two bicycle storage areas that can accommodate up to 36 bicycles. The project also provides a storage room in each unit, which can be used for bike storage at individual residences and a bike rack accommodating four short-term bicycle parking spaces for visitors.

Bicycle access to the site is provided via existing class II bike lanes along Oddstad Boulevard, which connect to nearby bike lanes on Terra Nova Boulevard and Linda Mar Boulevard. Pedestrian access to the site is provided by existing sidewalks along the frontage on Oddstad Boulevard and crosswalks at the intersections of Big Bend Dr/Oddstad Blvd and Yosemite Dr/Oddstad Blvd. Sidewalks are also provided throughout the interior portions of the site.

The project has considered standard sight distances that will allow drivers exiting the site to see pedestrians, bicyclists, and vehicles on Oddstad Boulevard. The Caltrans standard for stopping sight distance is considered the minimum acceptable sight distance and is based on roadway speeds. Oddstad Boulevard has a posted speed limit of 30 miles per hour, which correlates to the Caltrans stopping sight distance of 250 feet. In order to stop and avoid a collision, a driver would need to be able to see 250 feet both directions along Oddstad Boulevard. The project will maintain existing trees near the proposed driveway, however, as detailed in the Traffic Analysis, these trees do not obstruct sight distance as tree branches

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process in the future, which process includes multiple opportunities for public input.

are at an adequate height from the ground such that sight distance is not impaired. Further, consistent with city standards, landscaping at the project frontage will not obstruct sight distance at the driveways. To ensure on-street parking does not obstruct sight lines at the project driveway, it is recommended that 30 feet of red curb be painted to the left of the driveway.

#### **4.13.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, the project would result in a significant impact related to transportation if it would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities
2. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
4. Result in inadequate emergency access

#### **4.13.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

***Impact TRA-1: The project will not conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities (less than significant impact).***

The project is consistent with applicable General Plan Circulation Element policies and actions. The design meets the minimum parking ratios contained in the Pacifica Municipal Code to implement Circulation Element Policy 14, which calls for providing adequate off-street parking in developments.. The project consists of 32 one-bedroom units, 28 two-bedroom units, and 10 three-bedroom units. Title 9, Chapter 4, Article 28 of the Pacifica Municipal Code establishes multifamily residential parking requirements of one space for each studio, one and one-half spaces for each one-bedroom unit, two spaces for each two or more-bedroom unit, and one guest parking space per four units (rounding down any fractional unit for guest parking). Resident parking must consist of at least one carport or garage space per unit. In compliance with the requirements, the site provides a total of 142 parking spaces, of which there are 70 covered parking spaces, 35 uncovered parking spaces, and 17 guest parking spaces.

As stated previously, the project is estimated to generate 484 average daily trips including 30 during the AM peak hour and 37 during the PM peak hour. Due to the project generating fewer than 100 new trips during the a.m. and p.m. peak hour, it is not subject to CMP land use guidelines. Furthermore, the increase in traffic on area roadways represents a minimal change to existing conditions and as such orderly growth will be maintained between land use and circulation.

The project does not interfere with existing or proposed pedestrian and bicycle facilities in the surrounding area and does not conflict with transit facilities in that it will not generate use of transit facilities that will exceed existing capacity. Oddstad Boulevard is currently well served by existing sidewalks and bicycle lanes. The project will provide 36 long-term and 4 short-term bicycle parking spaces to support bicycling as an alternative to driving. Sidewalks will be installed throughout the site to provide interior pedestrian circulation that connects to existing sidewalks on Oddstad Boulevard. The nearest bus stop to the project site is located approximately 0.5 miles south at the corner of Oddstad Boulevard and Terra Nova Boulevard. From this location, access to Routes 14, 19, and 110 are available which include local and regional access.

Based on the project's consistency with applicable regulations related to parking, the minimal increase in traffic above existing conditions, and the provision for bicycle and pedestrian amenities that support the use of alternative transportation modes consistent with the City's General Plan, impacts due to a conflict with a program, plan, ordinance or policy addressing the circulation system will be less than significant.

***Impact TRA-2: The project will conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (B) (significant impact).***

The project proposes 45 below market rate units, 44 of which will be leased to Pacifica School District employees, and one of which will be leased to an on-site property manager. The remaining 25 units will be leased to market rate tenants. As described previously, the Traffic Analysis assumes each unit will be occupied by two driving-age tenants for a total of 140 residents driving to and from the site. As shown in Table 4.13-1, units leased at below market rate to Pacifica School District employees will result in a daily VMT per capita generation of 7.4 miles for PSD employees, which is based on the average distance from the site to PSD schools. Consistent with the findings presented in Income, Location Efficiency, and VMT:

Affordable Housing as a Climate Strategy,<sup>3</sup> it is assumed that VMT per capita for non-PSD employee resident will be 17.2 miles, which is 10 percent less than the area VMT of 19.1. The below market rate unit for the onsite property manager will generate a VMT of 0 miles for the onsite property manager residents as there would be no commute trip associated with an onsite worker, and 19.1 miles for the non-manager resident which is equivalent to the average VMT for the project site. Similarly, residents of the market rate units would generate a VMT per capita of 19.1 miles.

Average VMT for the project was calculated by multiplying the total number of units by daily VMT per capita for each category of occupants including PSD employees and non-PSD employees in PSD-restricted units, market rate tenants, and the on-site property manager, then divided by the assumed population of 140 driving-age residents. The resulting average VMT per capita for the project was estimated to be 14.69. As shown below, the existing citywide VMT per capita is 15.81. Therefore, the average VMT for the project would need to be 13.44 to meet the threshold of 15% below the existing citywide average. Since the project will result in an average VMT of 14.69 which is greater than the threshold of 13.44 VMT, impacts of the project will be significant.

**TABLE 4.13-1: PROJECT VEHICLE MILES TRAVELED ESTIMATES<sup>4</sup>**

	Number of units	Daily VMT/Capita	Total Daily VMT
Pacifica School District units			
PSD employee trip length	44	7.4	325.6
Non-PSD employee trip length		17.2	756.8
Market Rate Units			
Resident 1	25	19.1	477.5
Resident 2		19.1	477.5
On-site property manager			
Manager trip length	1	0.0	0
Non-manager trip length		19.1	19.1
Total	70	-	2,056.5
Average VMT for the project	14.69		
Existing citywide average VMT per capita	15.81		
VMT threshold (15% below citywide average)	13.44		

<sup>3</sup> Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy, Gregory L. Newmark Ph.D and Peter M. Haas Ph.D, page 15.

<sup>4</sup> Traffic Analysis for the Oddstad Workforce Housing in Pacifica, CA, prepared by Hexagon Transportation Consultants, Inc., March 17, 2022, page 5, Table 1

Since VMT impacts exceed the threshold of 15% below the existing citywide average, the Traffic Analysis includes a discussion of mitigation measures intended to reduce impacts of the project. As provided in the analysis the only feasible mitigation measures include those that would be implemented at the district-wide level such as:

- Pursuing Safe Routes to Schools grants to fund improvements
- Improving safety of students walking and bicycling to school
- Installing more bike racks at existing school facilities
- Installing E-bike charging systems in secure bike parking facilities at school facilities
- Continuing to work with Samtrans to establish fixed-route services to schools in the District
- Partnering with the Jefferson Union High School District to fund shuttle services to schools in the District.

Given that there is limited evidence to support VMT reductions from such programs, it is not feasible to quantify VMT reductions of the alternative mode programs. Programs identified as potential mitigations in the Traffic Analysis are intended to encourage staff and students to walk, bike, or use transit to get to school however, given the conceptual nature of these programs, the level of staff and student participation, and resulting VMT reduction is unknown at this time. Furthermore, many of the strategies identified are complementary to one another such as Safe Routes to School and installation of more bike racks and e-bike charging stations, which makes isolating their effectiveness difficult. Nonetheless, measures that encourage alternative transportation can help reduce VMT. Programs that are intended to increase bus or shuttle service to the schools would also help to reduce VMT, however, these services are not in place at the time and therefore the level of reduction is not known. Based on the lack of quantitative data available, it is assumed that the project VMT cannot be reduced below the VMT threshold of 15%, and therefore the project will result in a significant and unavoidable impact related to conflicts with CEQA Guidelines section 15064.3(b).

Though the project will result in a significant and unavoidable impact related to project VMT, the General Plan Update and Sharp Park Specific Plan EIR (SCH No. 2012022046), certified by the City Council on July 11, 2022, concludes that implementation of the General Plan will result in significant and unavoidable impacts related to VMT. Residential development<sup>5</sup> at the project site is anticipated by the General Plan, therefore, the resulting significant and

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<sup>5</sup> The 2040 General Plan included a build-out projection of 81 units on the 12.49-acre project site (2040 General Plan, Table 4-2).



unavoidable VMT impact of the project has already been considered.<sup>6</sup> Consistent with Section 15177 (Subsequent Projects Within the Scope of the MEIR) of the CEQA Guidelines, since the proposed project is within the scope of the General Plan EIR, it is subject to limited environmental review as the reasonably foreseeable impacts in this regard have already been considered. As such, no further analysis of VMT is needed as the significance of such impacts has been considered in the EIR prepared for the City of Pacifica General Plan. Despite the significant and unavoidable impacts of the project as it relates to VMT, implementation of **Mitigation Measure TRA-1** shall be required. As provided therein, upon submittal of plans for a building permit, the project applicant shall also submit Transportation Demand Management (TDM) strategies to be implemented throughout the Pacifica School District system. Strategies may include but are not limited to implementing Safe Routes to School programs at PSD schools, installing bike racks, e-bike charging stations, and electric vehicle charging stations at PSD schools, providing flex services through partnership with Samtrans, and providing shuttle services in partnership with Jefferson Union School District. In addition, to offset GHG emissions generated as a result of vehicles traveling to and from the site, the project shall comply with **Mitigation Measure TRA-2**, which requires installation of electric vehicle charging stations at the project site. Even with mitigation measures, the effectiveness of VMT reduction is unknown, therefore, impacts from the project will be significant and unavoidable due to generation of VMT.

***Impact TRA-3: The project will not substantially increase hazards due to a geometric design or incompatible uses (potentially significant impact).***

The project will not result in increased hazards due to a geometric design feature (such as sharp curves or dangerous intersections) or incompatible uses. The site has been designed to accommodate anticipated vehicular circulation on site including standard passenger vehicles as well as garbage trucks, and small to medium delivery trucks. Additionally, no issues with regard to emergency vehicle access and circulation were identified by the North County Fire Authority.

As discussed previously, the project meets the standard stopping sight distance established by Caltrans, which is 250 feet based on the 30 mile per hour speed limit on Oddstad Boulevard. As detailed in the Traffic Analysis, existing trees near the intersection of the site's

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<sup>6</sup> Discussion of the 2040 General Plan EIR is provided to demonstrate the factual basis for concluding that the significant and unavoidable impact from VMT due to the Project has already been evaluated within the context of that EIR. However, as previously noted, Government Code provisions limit the City's application of 1980 General Plan policies to the Project as a matter of law.

main entry have branches with a sufficient height from the ground such that there is no obstruction of sight distance for vehicles exiting the site. Additionally, there is no existing or proposed landscaping or other visual obstruction along the project frontage that could obscure sight distance. To ensure sight distance is maintained throughout operation of the project, compliance with **Mitigation Measure TRA-3** shall be required. As set forth in measure TRA-3, existing and proposed landscaping shall be maintained to preserve visibility including limiting hedges to 3 feet in height and maintaining a minimum clearance of 7 feet from the ground for trees. In addition, **Mitigation Measure TRA-4** requires installation of red curbs for a distance of at least 30 feet south of the proposed driveway on Oddstad Boulevard. With implementation of measures TRA-3 and TRA-4, impacts due to a geometric design feature hazard will be less than significant.

***Impact TRA-4: Implementation of the project will not result in inadequate emergency access (less than significant impact).***

The project will not result in inadequate emergency access during construction or at operation. Road closure is not anticipated by the proposed project, although temporary encroachment may occur during construction activities. Oddstad Boulevard is expected to remain accessible during temporary construction activities and will not substantially impair emergency access. Furthermore, prior to any work within a right-of-way, including any temporary lane closures, review of the proposed scope of work and approval of an encroachment permit by the Pacifica Public Works Department will be required.

At operation, the proposed project will provide drive aisles of sufficient width to allow for internal emergency access, and the existing public right-of-way currently provides emergency access to the surrounding area. The project's internal circulation plan has been reviewed and meets all requirements of the Pacifica Public Works Department and North County Fire Authority, including sufficient street widths to allow for fire truck access and access to the site. As such, emergency vehicle access during construction and at operation will be adequate and potential impacts will be less than significant.

***Mitigation Measures:***

**TRA-1:** Upon submittal of plans for building permit, the applicant shall submit a list of Transportation Demand Management strategies to be implemented district-wide. TDM strategies shall be clearly defined in terms of location, extent, timing, and responsibility for implementation. Strategies may include, but are not limited to the following:

- ♦ **Safe Routes to School.** Pursue grants to fund pedestrian and bicycle improvements around Pacifica School District schools to increase safety for students and staff walking and bicycling.
- ♦ **Install Bike Racks.** Identify Pacifica School District schools where more bicycle racks are needed. Once identified, install as needed.
- ♦ **Install e-bike Charging Stations.** Install e-bike charging systems in secure bike parking facilities at Pacifica School District schools.
- ♦ **Samtrans Flex Services.** Continue to partner with Samtrans to establish fixed-route services to Pacifica School District schools. Coordinate with Samtrans on possible flex services (such as dial-a-ride) to serve schools with lower demand.
- ♦ **Shuttle Services.** Partner with the Jefferson Union High School District to fund shuttle services to Pacifica schools.

**TRA-2:** To promote electric vehicle ownership and reduce GHG emissions associated with vehicles traveling to and from the site, install electric vehicle (EV) charging infrastructure and equipment as required by the 2022 California Building Standards Code and any City of Pacifica local amendments thereto.

**TRA-3:** To maintain adequate sight lines at the project driveways, signage and landscaping introduced onsite within close proximity of the driveways shall be maintained such that low-lying shrubs remain at a height lower than three feet from ground level and that tree branches be no less than seven feet in height from ground level. The applicant shall be responsible for maintaining adequate sight lines from the project driveways.

**TRA-4:** Parking shall be prohibited south of the project driveway along Oddstad Boulevard for a distance of at least 30 feet. To ensure parking does not occur in this area, curbs shall be painted red subject to review and approval by the North County Fire Authority.

#### 4.13.5 APPENDICES

- Appendix 4.13-A: Traffic Analysis for the Oddstad Workforce Housing in Pacifica, CA, prepared by Hexagon Transportation Consultants, Inc., July 27, 2022

#### 4.13.6 REFERENCES

1. City of Pacifica 1980 General Plan
2. City of Pacifica 2040 General Plan EIR
3. City of Pacifica Municipal Code

4. City/County Association of Governments, San Mateo County Congestion Management Program, Final Report, December 2019.
5. Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy by Gregory L. Newmark Ph.D and Peter M. Haas Ph.D, Center for Neighborhood Technology, December 16, 2015.



## 4.14 UTILITIES AND SERVICE SYSTEMS

This section describes the regulatory framework regarding utilities and service systems, summarizes the existing utilities serving the City of Pacifica, and analyzes the project's potential to result in environmental impacts related to increased demand of existing utilities.

### 4.14.1 REGULATORY CONTEXT

#### ***Federal***

##### *Clean Water Act*

As described in Section 4.8, Hydrology and Water Quality, the Clean Water Act (CWA) authorizes the United States Environmental Protection Agency (EPA) to implement water quality regulations. Through Section 402 of the CWA, the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating soil erosion and stormwater discharges into waters of the United States. NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards.

##### *Safe Drinking Water Act*

The Safe Drinking Water Act (SDWA) authorizes the Environmental Protection Agency to set national standards for drinking water through the National Primary Drinking Water Regulations to protect against both naturally occurring and man-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Department of Health Services is responsible for ensuring water systems test for contaminants, review plans for water system improvements, conduct on-site inspections and sanitary surveys, provide training and technical assistance, and take enforcement actions against water systems not meeting standards. Under the SDWA, states are required to certify water system operators to ensure technical, financial, and managerial capacity is in place to ensure safe drinking water is provided to system users.

##### *Resource Conservation and Recovery Act*

The Resource Conservation and Recovery Act (RCRA) gives the EPA authority to regulate solid waste hazards and non-hazardous wastes. Regulations addressing solid waste are contained in Title 40 of the Code of Federal Regulations including requirements that states implement

their own permitting programs incorporating Federal landfill criteria. In California, the California Department of Resources Recycling and Recovery (CalRecycle) provides oversight for all of California's state-managed non-hazardous waste handling and recycling programs.

### **State**

#### *California Water Code*

The California Water Code establishes regulations for the protection of water quality and beneficial uses of water including ground and surface water. In California, the State Water Resources Control Board is the primary authority for controlling water quality and use.

#### *Urban Water Management Planning Act*

The Urban Water Management Planning Act serves as a framework for the management of all urban water demands and the efficient use of urban water. Under its provisions, every urban water supplier is required to prepare and adopt an urban water management plan. An "urban water supplier" is a public or private water supplier that provides water for municipal purposes either directly or indirectly to more than 3,000 connections or supplying more than 3,000 acre-feet of water annually. The urban water management plan must identify and quantify the existing and planned sources of water available to the supplier, quantify the projected water use for a period of 20 years, and describe the supplier's water demand management measures. The urban water supplier should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The North Coast County Water District (NCCWD) provides water to residential, commercial, and governmental customers in the City of Pacifica. The 2020 Urban Water Management Plan for North Coast County Water District was adopted in June 2021 and updates the 2015 Plan in compliance with the Urban Water Management Planning Act.

#### *CALGreen Building Code*

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations [CCR]) to apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in the code, throughout the State of California. CALGreen established planning and design standards for sustainable site development, including water



conservation and requires new buildings to reduce water consumption by twenty percent through more water efficient plumbing fixtures and fittings. The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011. The building efficiency standards are enforced through the local building permit process.

#### *General Waste Discharge Requirement*

On May 2, 2006, the SWRCB adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than one mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows (SSOs) by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan (SSMP). The General Waste Discharge Requirement also requires that storm sewer overflows be reported to the SWRCB using an online reporting system. The SWRCB has delegated authority to nine Regional Water Quality Control Boards to enforce these requirements within their region. The City of Pacifica is within the jurisdiction of the San Francisco Regional Water Quality Control Board (SFRWQCB).

#### *California Integrated Waste Management Act*

The California Integrated Waste Management Act, also known as AB 939 requires cities and counties to divert fifty percent of solid waste from landfills beginning in 2000 and each year thereafter through source reduction, composting, and recycling, with the highest priority given to source reduction, which is defined as the reduction of solid waste generation. The Act requires that cities and counties identify ways in which they will achieve reductions in an integrated waste management plan (IWMPs) that is also required to include a Source Reduction and Recycling Element. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

#### *Solid Waste Disposal Measurement System Act*

The Solid Waste Disposal Measurement System Act, also known as SB 1016, amends the California Integrated Waste Management Act compliance requirements for measuring and reporting fifty percent solid waste diversion requirements. Beginning in 2009, the Act requires that diversion rates be measured in terms of per-capita disposal expressed as pounds per person per day. Every year CalRecycle calculates each jurisdiction's per capita (per resident and per employee) disposal rates and reviews jurisdiction compliance on a

case-by-case basis. Jurisdictions are not compared to other jurisdictions or the statewide average but compared to their own fifty percent per capita disposal target.

#### *Senate Bill 1383*

As described in Section 3.7, Greenhouse Gas Emissions, SB 1383 was signed in September 2016 to reduce emissions of short-lived climate pollutants. As it pertains to CalRecycle, SB 1383 establishes targets to achieve a fifty percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a seventy-five percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than twenty percent of currently disposed edible food is recovered for human consumption by 2025. SB 1383 further supports California's efforts to achieve the statewide seventy-five percent recycling goal by 2020 established in AB 341.

#### ***Local***

##### *North Coast County Water District 2020 Urban Water Management Plan*

The NCCWD delivers water to residential, commercial, and governmental customers in the City of Pacifica and purchases all its potable water supplies from the San Francisco Public Utilities Commission. As noted in the 2020 Urban Water Management Plan (UWMP), adopted June 2021, the NCCWD serves approximately 12,260 water connections within its service area. In addition, the NCCWD provides recycled water for landscape irrigation users. The intent of the UWMP is to provide a long-range planning document for water supply and system planning as well as provide data on population, housing, water supply and demand, and capital improvement projects identified at the state, regional, and local levels.

##### *San Mateo Countywide Integrated Waste Management Plan*

The San Mateo Countywide Integrated Waste Management Plan adopted January 8, 1999 serves as the IWMP for all jurisdictions in San Mateo County, including Pacifica. Consistent with the requirements of the California Integrated Waste Management Act, the Plan includes a Source Reduction Recycling Element and Household Hazards Waste Element. The IWMP identifies goals, objectives, and policies that are intended to document progress toward the 25 and 50 percent diversion rates, educate the public on the intent of the Plan, increase awareness and participation in diversion programs, seek high participation in recycling and composting programs, and increase diversion programs in the commercial sector. The most recent available five-year review of the county's IWMP is from 2014 and identifies that the

Plan remains adequate. Subsequently, in 2019, the San Mateo County Grand Jury issued findings and recommendations related to the IWMP, concluding the San Mateo County Office of Sustainability should replace the existing 1999 Countywide Integrated Waste Management Plan, including the Summary Plan, landfill Siting Element, and Non-Disposal Facilities Element with a revised plan by January 1, 2021. As of the writing of this report, an updated Plan has not been prepared.

#### *San Mateo Countywide Water Pollution Prevention Program*

The San Mateo County Water Pollution Prevention Program (SMCWPPP) was established in 1990 with the assistance of the San Mateo County City/County Association of Governments. The primary goal of the SMCWPPP is to reduce pollution carried by stormwater throughout San Mateo County into local creeks, San Francisco Bay, and the Pacific Ocean, and to maintain compliance with the NPDES permit. The program is managed and maintained by San Mateo County and the 20 participating cities, including Pacifica.

#### *Pacifica Municipal Code*

Title 6 (Sanitation and Health), Chapter 5 (Garbage, Collection, and Recycling) of the Pacifica Municipal Code sets forth regulations related to solid waste and recycling including collection, recyclable materials, recycling spaces required in development projects, and mandatory organic waste disposal requirements, among others. Title 6, Chapter 13 (Wastewater Control), Article 2 (Regulation of Wastewater Discharges) sets forth permissible and prohibited discharges to the sewer system. Title 8 (Building Regulations), Chapter 7 (Green Building Code) specifies that the requirements of the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO) shall apply.

### **4.14.2 ENVIRONMENTAL SETTING**

#### ***Water Supply Services***

As previously discussed, the City of Pacifica, receives water from the NCCWD who delivers water to residential, commercial, and governmental customers and purchases all its potable water supplies from the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS). Water distribution, water conservation, and maintenance of water quality are the NCCWD's main water resource functions, as treated water purchased from the SFPUC RWS does not require further water treatment. Additionally, the NCCWD serves recycled water to customers for landscape irrigation via its recycled water system. NCCWD is a special district and a separate agency from the City of Pacifica.

**Wastewater**

Sewer utilities for the proposed project would be provided by the City of Pacifica. The City operates a wastewater treatment and recycling plant, sewage lift stations, and stormwater pump stations, as well as the citywide system of sewer mains and lateral pipes that connect to homes and businesses. Wastewater flows through approximately 82 miles of main pipes to six sewer pump stations and then to the Calera Creek Water Recycling Plant (CCWRP), located at 700 Coast Highway. The CCWRP can treat 4 million gallons of sewage per day, and up to 20 million gallons per day during storm events.

On May 11, 2011 the Regional Water Quality Control Board issued Cease and Desist Order No. R2-2011-0031<sup>1</sup> which required the City to eliminate insufficient capacity-caused Sanitary Sewer Overflows from the sanitary sewer collection system. To comply with the Cease and Desist Order, the City of Pacifica constructed a 2.1 million gallon wet weather flow Equalization Basin, which is intended to avoid the occurrence of sewer overflows during the rainy season.

**Stormwater**

Pacifica's storm drainage system consists of a collection system and two pump stations. This drainage system conveys drainage to area creeks or the ocean. Two areas in the City, Linda Mar and lower Sharp Park, are too low to allow drainage to a creek or the ocean, and are served by pump stations to prevent street flooding. The Streets Division of Pacifica's Public Works Department maintains 290,000 linear feet of storm drain pipes with 989 storm drain inlets within the City right-of-way and easements.<sup>2</sup> In 2004, the City completed the Pacifica State Beach Improvement Project, a complex initiative requiring the cooperation of many agencies and funding sources. Among the project's key elements was the diversion of stormwater from the City's pump stations to two constructed wetland treatment swales. The project has successfully redirected polluted water from first-flush release into the ocean, resulting in improved water quality.

**Solid Waste**

Solid waste collection and recycling services in Pacifica are provided by Recology of the Coast, a division of Recology. Based in San Francisco, Recology operates a number of landfills, waste

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<sup>1</sup> San Francisco Regional Water Quality Control Board, Revised Tentative Order, Amendment of Cease and Desist Order for City of Pacifica Calera Creek Water Recycling Plant and Wastewater Collection System in Pacifica, San Mateo County

<sup>2</sup> City of Pacifica, Departments, Public Works, Streets, Storm Drains:  
[https://www.cityofpacific.org/depts/pw/field\\_services/streets/storm\\_drains.asp](https://www.cityofpacific.org/depts/pw/field_services/streets/storm_drains.asp), accessed April 2022.

transfer and materials recovery facilities throughout the Bay Area, including the recycling yard at 1046 Palmetto Avenue in Pacifica and the Ox Mountain Landfill, located east of the City of Half Moon Bay in unincorporated San Mateo County. Recology emphasizes waste reduction and diversion and is the largest compost facility operator by volume in the United States. In Pacifica, Recology of the Coast currently provides curbside pick-up of garbage, recyclables, and green waste for both residential and commercial customers. In 2009, the City Council adopted Ordinance No. 767 which is codified in Title 6, Chapter 5, Article 4 and enacted an ordinance requiring all food vendors to use biodegradable or compostable service ware. Both Pacifica and San Mateo County provide information to help residents and businesses reduce and divert waste from landfills.

### ***Gas and Electricity***

Peninsula Clean Energy is a community-led electricity provider serving San Mateo County. Peninsula Clean Energy provides 100 percent carbon-free energy with a goal of being 100 percent renewable by 2025 at lower prices than PG&E and invests proceeds back into the community. Peninsula Clean Energy is a California Community Choice Aggregation (CCA) organization and provides flexibility and local control to use innovative options for purchasing and generating electricity for residents and businesses. Customers have two options including the default option, Ecoplus which has lower rates and nearly double the percentage of renewable energy as compared to PG&E, and ECO100, which is 100 percent renewable energy. A variety of resource types, including solar, wind, geothermal, and hydro are procured by Peninsula Clean Energy from a variety of sources.

Pacific Gas & Electric (PG&E) also provides gas and electric services to Pacifica homes and businesses, with energy obtained from power plants, natural gas fields, and renewable energy sources in northern California. One natural gas transmission line feeds into the City.

### **4.14.3 THRESHOLDS OF SIGNIFICANCE**

According to the CEQA Guidelines Appendix G, the proposed project would result in a significant impact related to utilities and service systems if it would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
2. Not have sufficient water supplies available to serve the project and reasonably

foreseeable future development during normal, dry and multiple dry years.

3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
5. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

#### **4.14.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

***Impact UTIL-1: Implementation of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects (less than significant impact).***

Water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications services will be provided to the project by way of connection to existing infrastructure in the vicinity of the project site. Water service would be provided by the NCCWD, wastewater treatment and storm water drainage would be provided by the City of Pacifica, and electricity would be provided by Peninsula Clean Energy or PG&E. A variety of private entities provide telecommunications services in the City of Pacifica.

##### *Water*

Potable water is provided by the NCCWD by way of the SFPUC RWS, which is obtained by the treatment of water at the Harry Tracy Water Treatment Plant (HTWTP) in San Bruno. This facility has been recently improved to enhance the plant's treatment capacity by including seismic retrofits and electrical upgrades. The improved facility has the capacity to provide 140 million gallons of water per day (MGD) for 60 days within 24 hours of a major earthquake.<sup>3</sup> As discussed further below, the water demand generated by project residents of 4.74 MG per year would be relatively minimal to the overall capacity of the facility and the water demand projections identified in the 2020 UWMP. Additionally, as previously noted

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<sup>3</sup> The Harry Tracy Water Treatment Plant, Fact Sheet 2017.

the project will connect proposed onsite water laterals to existing water connections. Therefore, the project would not require relocation or further expansion of existing water facilities and impacts of the project would be less than significant.

#### *Wastewater treatment*

The City of Pacifica's CCWRP treats wastewater within the city and can provide advanced-tertiary treatment for an average daily dry weather design flow of 4.0 MGD and a peak wet weather discharge capacity of 20 MGD, as discussed in Section 4.14.2. Additionally, the City has constructed a 2.1-million-gallon wet weather equalization basin approximately two miles upstream of the headworks to avoid the occurrence of sewer overflows during the rainy season. As such, adequate capacity is available to serve the increase in demand resulting from the proposed project impacts of the project would be less than significant.

#### *Storm water drainage*

The proposed project is not expected to significantly increase runoff relative to the existing condition since the site will be improved with an onsite storm drain system that conveys runoff to the existing storm drain system, consistent with the storm water requirements set forth in Title 6, Chapter 12 of the City's Municipal Code, San Mateo Countywide Water Pollution Prevention Program, and as required by the Municipal Regional Stormwater Permit. These regulations require that storm water on a project site be detained and treated before release to the off-site city storm water system, which will result in an equivalent or reduced amount of storm water discharges from the project site. Through compliance with applicable regulations and standard conditions of approval, the project is will result in less than significant impacts due to the expansion of existing storm water drainage facilities or construction of new facilities.

#### *Natural gas, electric, and telecommunications*

Electricity, natural gas, and telecommunications utilities would be provided via connections to existing infrastructure located within the immediate project vicinity. The project would not necessitate major upgrades to, or extension of, existing natural gas, electric and telecommunications infrastructure and as such impacts of the project will be less than significant.



***Impact UTIL-2: Implementation of project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (less than significant impact).***

In accordance with the SFPUC's perpetual obligation to the NCCWD's Supply Assurance, the NCCWD has a water supply, known as an Individual Supply Guarantee (ISG) of 3.84 MGD, or 1,402 million gallons (MG) per year. The SFPUC is obligated to provide NCCWD with up to 100 percent of the District's ISG during normal years. The population served by the NCCWD is closely represented by the population within the boundaries of the City of Pacifica. According to the 2020 Urban Water Management Plan, the NCCWD is estimated to have excess capacity to serve the City through the year 2045 during normal years, as shown in Table 4.14-1. The UWMP estimates a daily usage of 65 gallons per capita per day (GPCD), which is based on water use for the District in 2020. The project proposes to construct 70 residential units. Based on an average household size of 2.86 persons<sup>4</sup>, the estimated daily water usage by project residents (approximately 200 persons) would be 4.74 MG per year, which can be accommodated within the water supply available through the year 2045 during normal years.

**TABLE 4.14-1: NORMAL YEAR WATER SUPPLY AND DEMAND COMPARISON<sup>5</sup>**

	<b>2025 (in MG)</b>	<b>2030 (in MG)</b>	<b>2035 (in MG)</b>	<b>2040 (in MG)</b>	<b>2045 (in MG)</b>
Supply Total	1,411	1,411	1,411	1,411	1,411
Demand Total	855	838	827	826	828
Difference	556	572	584	585	583

Note: Supplies and demand include potable and recycled water with 1,402 MG in potable water supply and projected recycled water demand, represented in MG for each year.

During single or multiple dry years, the yield of water supply would be considerably less. The 2020 UMWP includes projected supply and demand totals for the single dry year, assuming implementation of the Bay Delta Plan Amendment<sup>6</sup>, which would require rationing of water

<sup>4</sup> 2015-2019 American Community Survey, U.S. Census Bureau

<sup>5</sup> North Coast County Water District, 2020 UWMP, Table 7-4, page 99

<sup>6</sup> In December 2018, the State Water Resources Control Board (SWRCB) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The SWRCB is required by law to regularly review this plan. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 30-50% of the "unimpaired flow" on the three tributaries from February through June in every year

supply, as well as without implementation of the Bay-Delta Amendment, referred to as Scenario 2. Single dry year supply and demand for each scenario are shown in the tables below.

**TABLE 4.14-2: SINGLE DRY YEAR WATER SUPPLY AND DEMAND COMPARISON  
(BAY-DELTA PLAN AMENDMENT)<sup>7</sup>**

	<b>2025 (in MG)</b>	<b>2030 (in MG)</b>	<b>2035 (in MG)</b>	<b>2040 (in MG)</b>	<b>2045 (in MG)</b>
Supply Total	552	549	552	552	476
Demand Total	855	838	827	826	828
Difference	-303	-289	-274	-273	-352

**TABLE 4.14-3: SINGLE DRY YEAR WATER SUPPLY AND DEMAND COMPARISON  
(WITHOUT BAY-DELTA PLAN AMENDMENT)<sup>8</sup>**

	<b>2025 (in MG)</b>	<b>2030 (in MG)</b>	<b>2035 (in MG)</b>	<b>2040 (in MG)</b>	<b>2045 (in MG)</b>
Supply Total	863	863	863	863	863
Demand Total	855	838	827	826	828
Difference	8	25	36	37	35

According to the 2020 UWMP, implementation of the Bay-Delta Plan Amendment will require rationing in all single dry years and multiple dry years. The SFPUC has initiated an Alternative Water Supply Planning Program (AWSP) to ensure that San Francisco can meet its Retail and Wholesale Customer water needs, address projected dry years shortages, and limit rationing to a maximum 20 percent system-wide in accordance with adopted SFPUC policies. This program is in early planning stages and is intended to meet future water supply challenges and vulnerabilities such as environmental flow needs and other regulatory changes; earthquakes, disasters, and emergencies; increases in population and employment; and climate change. As the region faces future challenges – both known and unknown – the SFPUC is considering this suite of diverse nontraditional supplies and leveraging regional partnerships to meet Retail and Wholesale Customer needs through 2045. With implementation of the impending AWSP water supply programs, as well as the minimal

type. In SFPUC modeling of the new flow standard, it is assumed that the required release is 40% of unimpaired flow.

<sup>7</sup> North Coast County Water District, 2020 UWMP, Table 7-5, page 99

<sup>8</sup> North Coast County Water District, 2020 UWMP, Table 7-6, page 100

increase in water demand, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years and impacts of the project would be less than significant.

***Impact UTIL-3: Implementation of the project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (less than significant impact).***

The City of Pacifica is the wastewater treatment provider for the project. The existing Calera Creek Water Recycling Plant has sufficient capacity to serve additional wastewater generated by the project. Furthermore, the City's equalization basin provides for additional capacity to avoid the occurrence of sewer overflows during the rainy season. As such, existing wastewater treatment facility capacity is sufficient to serve the project's projected demand and impacts of the project would be less than significant.

***Impact UTIL-4: Implementation of the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (less than significant impact).***

As previously discussed, solid waste collection services, including curbside pick-up of garbage, recyclables, and green waste within the City of Pacifica are provided by Recology of the Coast, a Division of Recology. Solid waste is disposed of at the Ox Mountain Landfill, and is planned for closure in 2034. As of 2015, the Ox Mountain Landfill had 22,180,000 cubic yards of remaining available capacity, or approximately 36.7 percent of the facility's maximum permitted capacity of 60,500,000 cubic yards<sup>9</sup>.

The City of Pacifica Climate Action Plan<sup>10</sup> addresses solid waste by setting a goal to achieve 75 percent diversion community-wide (which would include the project) by 2020. This goal includes programmatic actions that include increasing participation in recycling programs and ensuring weekly collection of recyclables and organic waste. To achieve this, Pacifica approved a new solid waste management contract with Recology of the Coast in 2016 to establish comprehensive commercial and residential recycling, compost, and solid waste management programs. Additionally, Recology continues to implement and promote resource recovery to reduce the amount of waste that is placed in a landfill, with the overall

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<sup>9</sup> CalRecycle. SWIS Facility/Site Activity Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002), <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>, last accessed January 20, 2022

<sup>10</sup> City of Pacifica Climate Action Plan Implementation Report, October 2017, page 2, page 7

goal to make the best and highest use of all resources that are manufactured, consumed, discarded and re-manufactured. In 2017 Recology of the Coast recorded a diversion rate of 76 percent of solid wastes in Pacifica with the driving factor being the increase of curbside recycling from every other week to weekly. According to CalRecycle Per Capita Disposal Trends for the City of Pacifica, the per capita disposal rate in 2020 was 3.5 pounds per day (PPD) per person. Based on an estimated population of 200 people, the project would generate approximately 128 tons per year<sup>11</sup>, which represents less than one percent of the remaining capacity of the Ox Mountain Landfill. Based on the anticipated minimal waste generation associated with the project as well as ongoing waste diversion and reduction efforts, the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure and as such impacts of the project would be less than significant.

***Impact UTIL-5: Implementation of the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste (less than significant impact).***

The project is expected to generate solid waste typical of residential uses. The applicant will be required to adhere to all federal, state, and local regulations governing the disposal of solid waste. Furthermore, although the project will generate a waste stream during construction activities, the project will be required to demonstrate reductions in waste generation through the development of a construction waste management plan. As such, the project would not result in violations of federal, state, or local statutes and regulations related to solid waste, and implementation of the project would result in less than significant impacts.

#### **4.14.5 REFERENCES**

1. CalRecycle Jurisdiction Per Capita Disposal Trends, Pacifica, 2020
2. CalRecycle. SWIS Facility/Site Activity Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002)
3. City of Pacifica Climate Action Plan Implementation Report, October 2017
4. City of Pacifica, Wastewater Treatment, Wastewater Collection, Sanitary Sewer System, <https://www.cityofpacifica.org/departments/public-works/wastewater-treatment/wastewater-collection/sanitary-sewer-system>

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<sup>11</sup> (3.5 PPD)(200 residents) = 700 PPD; (700 PPD)(365 days) = 255,500 PPY; 255,500 PPY/2,000 tons = 128 tons per year

5. City of Pacifica Wet Weather Equalization Basin Project Information Sheet
6. County of San Mateo, 2014 Five-Year Countywide Integrated Waste Management Plan Review Report, October 2014
7. North Coast County Water District, 2020 Urban Water Management Plan, June 2021
8. San Mateo County Integrated Waste Management Plan, Final Draft, January 8, 1999
9. San Francisco Regional Water Quality Control Board, Revised Tentative Order, Amendment of Cease and Desist Order for City of Pacifica Calera Creek Water Recycling Plant and Wastewater Collection System in Pacifica, San Mateo County,
10. Superior Court of California, County of San Mateo, Planning for the County's Waste Management Challenges, 2018-2019 San Mateo County Civil Grand Jury, 2019
11. The Harry Tracy Water Treatment Plant Fact Sheet, February 2017
12. U.S. EPA, Understanding the Safe Drinking Water Act, June 2004

## 4.15 WILDFIRE

This section summarizes the regulatory framework for wildfire, summarizes the wildfire risk factors affecting the project site, and discusses the potential impacts resulting from implementation of the proposed project. The following documents were used to analyze the potential impacts that could occur:

- Vegetation Management Plan Memorandum, prepared by Richard Johnson, Retired Fire Marshal North County Fire Authority, February 28, 2022

### 4.15.1 REGULATORY CONTEXT

#### ***Federal***

##### *Federal Emergency Management Act*

In March 2003, the Federal Emergency Management Agency (FEMA) became part of the U.S. Department of Homeland Security. FEMA's continuing mission is to lead the effort to prepare the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the U.S. Fire Administration. The City of Pacifica is under the jurisdiction of FEMA Region 9, which covers Arizona, California, Hawaii, Nevada, Guam, American Samoa, Commonwealth of Northern Mariana Islands, Republic of Marshall Islands, Federated State of Micronesia, and more than 150 sovereign tribal entities. FEMA Region 9 specifically plans for hazards, including wildfires.

#### ***State***

##### *California Department of Forestry and Fire Protection*

The California Department of Forestry and Fire Protection (CAL FIRE) protects people and safeguards property from wildland fires in California. Prevention is a key component of CAL FIRE's mission including pre-fire engineering, vegetation management, fire planning, education, and law enforcement. It provides statewide direction for fire prevention in wildland areas and reviews regulations and building standards. CAL FIRE maps Fire Hazard Severity Zones (FHSZs) statewide based on fuel, slope, and weather. It also designates land as either Federal, State, or Local Responsibility Area (FRA, SRA, or LRA).

##### *California Fire Code*

The California Fire Code (CFC) is Part 9 of Title 24, California Code of Regulations, also referred to as the California Building Standards Code. The CFC incorporates the 2018

International Fire Code of the International Code Council with necessary California amendments. The purpose of the CFC is to establish the minimum requirements consistent with nationally recognized best practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations.

### *California Building Code*

Chapter 7A of the California Building Code (CBC) establishes specific requirements for construction of new buildings located within areas designated as wildland urban interface (WUI). This chapter of the CBC is intended to increase fire resistance of buildings and structures located within the WUI and includes regulations related to vegetation management, non-combustible materials, and the location of vents, among other requirements.

### *AB 747: General Plans – Safety Element*

Adopted in 2019, AB 747 revised Government Code section 65302(g) to require cities and counties to address evacuation routes related to identified fire and geologic hazards in the safety element of general plans. Cities that contain a Very High Fire Hazard Severity Zone and counties that contain a SRA must submit a safety element for review by the California Board of Forestry and Fire Protection and any applicable local fire protection agency. Local agencies are also required to prepare a local hazard mitigation plan (LHMP) every five years and can work together on a multi-jurisdictional basis.

### *Public Resources Code 4291*

The Public Resources Code was amended in 2005 to include regulations related to defensible vegetation clearing around structures located within a State Responsibility Area. Specifically, property owners with structures adjoining a mountainous area, forest, or grassland must provide and maintain a 100-foot defensible space to minimize potential fuel around structures with the intent of minimizing risk of loss and to improve the safety of firefighters. The 100-foot defensible space area is comprised of two zones: a home defense zone within 30 feet of the structure with more intensive fuel management and the reduced fuel zone extending to 70 feet or the property line.<sup>1</sup>

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<sup>1</sup> Fire Safe San Mateo County, "Defensible Space," Website, available:



## ***Local***

### *North County Fire Authority*

The North County Fire Authority (NCFA) is a joint powers authority that was established in 2003. NCFA provides fire protection and emergency medical response services to Pacifica, Brisbane, and Daly City. Two of the NCFA's nine fire companies are in Pacifica. Fire Station 72, with one fire company, is located at 1100 Linda Mar Boulevard, approximately 1.6 miles from the project site. NCFA also provides code enforcement, plan review, and construction inspection through its Fire Prevention Services Division.

### *2021 Multijurisdictional Local Hazard Mitigation Plan*

The City of Pacifica, in conjunction with the County of San Mateo and other cities and special districts in the County, prepared an update to the Multijurisdictional Local Hazard Mitigation Plan, initially developed in 2005 and later updated in 2010 and 2016. The Plan identifies local policies and actions intended to reduce the risk to life and property from natural hazards including wildland fires. The plan also complies with federal planning regulations which require local governments to develop a hazard mitigation plan as a condition for receiving certain types of non-emergency disaster assistance, including funding for hazard mitigation plans. The 2021 update of the San Mateo County Multijurisdictional Local Hazard Mitigation Plan was adopted by the Pacifica City Council on November 22, 2021.

### *City of Pacifica General Plan 1980*

The Seismic Safety and Safety Element of the General Plan identifies known hazards in the City of Pacifica including fire hazards. Policies applicable to the proposed project include the following:

- Prohibit development in hazardous areas, including flood zones, unless detailed site investigations ensure that risks can be reduced to acceptable levels and the structure will be protected for its design life. Development shall be designed to withstand a minimum of a 100-year hazard event, regardless of the specific nature of the hazard. This concept applies to both on-site and off-site hazards.
- Maintain an emergency plan which provides adequate response to disasters, including emergency ingress and egress communitywide and for individual neighborhoods.
- Emphasize fire prevention measures.
- Continue to increase public education about various localized fire hazard problems, such as wildfires and areas with limited access.

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<https://firesafesanmarateo.org/preparedness/defensible-space>, accessed February 2022.

- Identify neighborhood evacuation routes. Routes may have to be pedestrian in those areas where access is limited and egress will conflict with fire and other emergency equipment.

#### **4.15.2 ENVIRONMENTAL SETTING**

Wildland fires typically start in an undeveloped area such as a forest or grassland. While wildfires occur infrequently, their effects typically cause more damage than urban fires. In California, most wildfire damage occurs in WUI areas, or areas where homes abut undeveloped forests or grasslands. Most wildfires are started by human activity such as faulty electrical infrastructure, equipment use, campfires, fireworks, and arson. The most recent deadly fire in San Mateo County, the CZU Lightning Complex in August 2020, was started by lightning. The CZU Lightning Complex fires burned over 85,000 acres resulting in 1 fatality, 1 injury, and 1,490 structures destroyed.<sup>2</sup>

Terrain, weather, wind, and vegetation all affect the location, frequency, and severity of wildfires. According to the 2021 Multijurisdictional Local Hazard Mitigation Plan, it is highly likely that wildfires will continue to occur in San Mateo County.

CAL FIRE maps areas of significant wildfire hazards based on weather, terrain, and fuel types and designates responsibility areas as either SRA or LRA, based on population density, land use, and land ownership. Areas within the City of Pacifica are designated as LRA while small areas of the Planning Area outside City limits are designated as SRA. In addition, lands owned by the federal government and the County, including the Golden Gate National Recreational Area (GGNRA) lands and San Pedro Valley County Park, are designated as FRA.

The majority of the Planning Area, including the project site are classified as having a minimal fire hazard within the LRA. Areas designated as high and very high fire hazard severity are primarily located in the SRA adjacent to the south and eastern edges of the City. In addition, the NCFE establishes areas within the City designated as WUI, which includes the project site. As such, the proposed project is subject to the requirements set forth in Chapter 7A of the California Building Code which is intended to increase fire resistance of buildings.

#### **4.15.3 THRESHOLDS OF SIGNIFICANCE**

As provided in Appendix G of the CEQA Guidelines, the project would result in a significant impact to wildfire if it would:

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<sup>2</sup> 2021 Multijurisdictional Local Hazard Mitigation Plan Volume 2 Planning Partner Annexes, October 2021

1. Substantially impair an adopted emergency response plan or emergency evacuation plan
2. Exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

#### **4.15.4 ANALYSIS, IMPACTS, AND MITIGATION MEASURES**

Impacts to wildfire resulting from implementation of the proposed project are discussed below. The impact analysis contained herein is based on the Vegetation Management Plan Memorandum prepared for the project (Appendix 4.15-A). Impacts to wildfire are assessed using the significance criteria listed in 4.15.3, above. This analysis identifies the potential direct and indirect impacts to wildfire from construction, operation, and maintenance activities related to the proposed project.

***Impact FIRE-1: The project would not substantially impair an adopted emergency response plan or emergency evacuation plan (less than significant impact).***

The residential portion of the project site will be accessed by a two-way driveway along the Oddstad Boulevard frontage. Oddstad Boulevard is identified as a collector roadway and serves the southeast residential areas of Pacifica. A collector roadway is a lower speed street that provides connections between local streets and arterial roadways. As detailed in the Traffic Analysis Oddstad Boulevard has a capacity of approximately 12,000 vehicle per day and is expected to operate substantially below the capacity given its location within a single family residential area without adjacent high traffic-generating uses. As further detailed in the Traffic Analysis, the proposed project will generate fewer trips as compared to the previous school use, and the addition of vehicles to adjacent roadways during peak periods will be minimal and will not substantially impair roadway operations.

The project site is located within 1.6 miles of the nearest fire station, and as discussed in further detail in the Public Services section of this EIR, is within the four-minute response time established by the NCFE. In addition, the City of Pacifica maintains information on the City's website ([www.CityofPacifica.org](http://www.CityofPacifica.org)) on wildfire preparedness for residents of the City including access to Zone Haven, which allows residents to look up their evacuation zone. The

project site is in evacuation zone PAC-E018. In a wildfire event, residents can look up their evacuation zone and the evacuation status (e.g. evacuation warning, evacuation order, etc.). Residents can also sign up for alerts (San Mateo County "SMC" Alert) through the San Mateo County Sheriff's Office of Emergency Services to be apprised of evacuation orders in the event of a wildfire. Furthermore, the proposed site plan has been reviewed by the City's Public Works and Fire Departments who determined that emergency access would be adequate. As shown on the Fire Department Access Plan (Sheet C7.0), and Fire Hydrant Spacing Plan (Sheet C7.1) of the submitted plans, fire apparatus and emergency response equipment can be deployed to all buildings on site in the event of fire. Prior to any work within the public right-of-way during construction, including any temporary lane closures, review of the proposed scope of work and approval of an encroachment permit by the Pacifica Public Works Department will be required, which would also be reviewed by the Fire Department to ensure adequate emergency access would be available.

Based on the available capacity of surrounding roadways to serve the nominal increase in trips associated with the project, the project site's proximity to a fire station, as well as available resources intended to keep residents informed during a wildfire event, the project would not interfere with an emergency response or action plan during construction or at operation and impacts resulting from the project would be less than significant.

***Impact FIRE-2: The project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (less than significant impact).***

The project site is located within the Wildland Urban Interface. The topography, climate, and vegetation of the project site and surrounding area to the east are conducive to the spread of wildland fires once started. Wildfires in the project area are a potential hazard, particularly during the fall seasons, when warm and dry winds combined with the dry vegetation have the potential to exacerbate ignition sources. As detailed in the Vegetation Management Plan Memorandum prepared for the project, the NCFA site access and steep slopes as factors impeding fire response at the site.

The project is required to comply with building and fire code requirements applicable to project's located within the WUI as set forth in Chapter 7A of the California Building Code. In particular, this section of the CBC sets forth regulations related to vegetation management, non-combustible materials, and the location of vents, which are intended to increase fire resistance of buildings located within the WUI. As a standard condition of approval, project

plans will be required to demonstrate compliance with applicable building and fire code regulations which will be reviewed by City staff to ensure that the new construction and its fire and life safety systems are designed, installed, and tested to the most current code requirements. In addition to building and fire code requirements, as set forth in the Vegetation Management Plan Memo, as a condition of project approval, the NCFA will require a minimum 100-foot defensible zone around all structures and a Vegetation Management Plan consistent with the Fire Safe San Mateo County Defensible Space Guidelines. Through compliance with building and fire code requirements for sites located within the WUI as well as implementation of conditions of approval set forth by the NCFA, the project will not exacerbate wildfire risks and would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire and impacts of the project would be less than significant.

***Impact FIRE-3: The project would not require installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (less than significant impact).***

The proposed project can be served by existing public water, sewer, and storm drain infrastructure. While existing overhead electrical transmission lines exist along the west side of Oddstad Boulevard, the project will obtain electric, gas, and communication service via an underground joint trench. Therefore, no overhead electric lines associated with the project will be installed. As shown on the project plans, a 100-foot defensible space will be established along the site's eastern boundary adjacent to Frontierland Park. In the case of a wildfire, this defensible space would help to slow or stop the spread of wildfire and protect residences from catching fire. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure that would exacerbate fire risk or result in temporary or ongoing impacts to the environment and impacts resulting from the project would be less than significant.

***Impact FIRE-4: The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (less than significant impact).***

The project proposes to retain the existing, concrete drainage ditch located adjacent to the steep slope on the eastern portion of the project site. Additionally, the project will comply with stormwater runoff requirements including installation of self-retaining areas which will retain and receive runoff from adjacent impervious areas of the site and will not result in

changes to the site's existing volume of off-site storm water flows. The project proposes to retain the steepest slopes onsite and will concentrate development on the flat portions of the site in areas currently developed. As a previously developed project site, improved with buildings and infrastructure, the proposed redevelopment will not substantially alter the site in a manner that would result in post fire slope instability or drainage changes. Furthermore, as described in the Geology and Soils section of this EIR, the potential for slope failures impacting the project site is low and concluded that there is no evidence of significant instability from adjacent slopes that could impact the project site. Therefore, impacts associated with post-fire slope instability will be less than significant.

#### **4.15.5 APPENDICES**

- Appendix 4.15-A: Vegetation Management Plan Memorandum, prepared by Richard Johnson, Retired Fire Marshal North County Fire Authority, February 28, 2022

#### **4.15.6 REFERENCES**

1. 2021 Multijurisdictional Local Hazard Mitigation Plan Volume 2 Planning Partner Annexes, October 2021

# 5.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines require that all phases of a project be considered when evaluating its impact on the environment, including during construction and operation. Further, the evaluation of significant impacts must consider direct and reasonably foreseeable indirect impacts of the project over the short-term and long-term. As detailed in CEQA Guidelines Section 15126, the EIR must discuss the following:

- Significant environmental effects of the proposed project
- Mitigation measures proposed to minimize significant effects
- Significant environmental effects that cannot be avoided if the proposed project is implemented
- Significant irreversible environmental changes that would result from implementation of the proposed project
- Growth-inducing impacts of the proposed project
- Alternatives to the proposed project.

Chapter 4, Environmental Evaluation, Sections 4.1 through 4.15 provide a comprehensive discussion and analysis of the proposed project's environmental impacts, proposed mitigation measures, and conclusions regarding the level of significance of each impact before and after mitigation. Chapter 5, Alternatives, presents a comparative analysis of alternatives to the proposed project. All other CEQA-required topics are presented herein.

In addition, this Chapter of the EIR also includes a discussion of the Mandatory Findings of Significance as provided in Appendix G of the CEQA Guidelines.

## 5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This section identifies significant impacts associated with implementation of the proposed project that cannot be mitigated to less than significant. As part of the certification process, the City Council will make a final decision as to the significance of impacts and the feasibility of mitigation measures in this Draft EIR. As detailed in Chapter 4, Section 4.13, implementation of the proposed project would result in significant and unavoidable impacts as it relates to the project's vehicle miles traveled (VMT) generation (**Impact TRA-2**), which exceeds the established threshold of 15% below the citywide average. **Mitigation Measure**



**TRA-1** and **TRA-2** have been identified to reduce potential VMT impacts and resulting GHG emissions to the maximum extent practicable, but impacts resulting from a conflict with CEQA Guidelines section 15064.3, subdivision (b) would remain significant and unavoidable.

## 5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the CEQA Guidelines states that an EIR must include a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy);
- The project would involve a large commitment of nonrenewable resources; or
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

### 5.2.1 COMMIT FUTURE GENERATIONS TO SIMILAR USES

Implementation of the proposed project would require demolition of the existing school buildings and associated site improvements and construction of 70 residential units in 7 buildings. The project will retain the existing recreational field onsite as part of the project and could therefore be developed as a separate use in the future, . A portion of the project would commit the site as a residential development, which would exclude other uses of the project site for the lifespan of the project.

### 5.2.2 CONSUMPTION OF NATURAL RESOURCES, INCLUDING NON-RENEWABLE RESOURCES

The proposed project involves construction of 70 residential units in 7 buildings as well as amenity and accessory buildings and other associated site improvements. Resources such as lumber and other forest products are generally considered renewable resources and would be replenished over the life of the project. As such, development of the project would not result in irreversible commitment of renewable resources. Non-renewable resources, such as natural gas, petroleum-based products, asphalt, petrochemical construction materials, steel, copper, and other metals, are resources that are available in finite supply as the processes that create these resources occur over a long period of time. Therefore, the replacement of these materials would not likely occur over the lifetime of the project and represents an irreversible commitment of non-renewable resources. The proposed project

would commit the site to a new type of land use as compared to the existing conditions and would involve an irreversible commitment through the use of renewable in the near term and non-renewable resources in the long term.

If these renewable and non-renewable resources are not consumed by the proposed project, they will likely be committed to other residential projects to meet the anticipated need for housing in the City of Pacifica. Furthermore, the investment of resources in this project would be typical of the level of investment normally required for residential developments of this size.

### 5.2.3 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

CEQA requires a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. As a residential use, the proposed project would not introduce a land use that requires the transport, storage, or on-site use of hazardous materials which, if inadvertently released, could result in irreversible damage to the environment. Therefore, the proposed project would not have the potential for irreversible damage from environmental accidents.

## 5.3 GROWTH INDUCING IMPACTS

As required by Section 15126.2(e), an EIR must discuss ways in which a proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. The EIR must also discuss the characteristics of the project that could encourage and facilitate other activities that could significantly impact the environment, either individually or cumulatively.

Growth can be induced in several ways, including through elimination of obstacles to growth, stimulation of economic activity within the region, or through establishment of policies or precedents that directly or indirectly encourage additional growth.

In general, a project may induce growth in a geographic area if it removes an impediment to growth (e.g., establishment of an essential public service, the provision of new access to an area, a change in zoning or general plan approval), provides opportunities for economic expansion in response to the project (e.g., employment expansion etc.), or proposes development in an isolated area or an area adjacent to open space (being distinct from an “infill” type of project). If a project meets any of these criteria, it can be considered growth inducing. An evaluation of the project against these growth-inducing criteria is provided below.

### 5.3.1 REMOVAL OF AN IMPEDIMENT TO GROWTH

In general, growth in an area may result from the removal of physical impediments or restrictions to growth. In this context, physical growth impediments would include non-existent or inadequate access to an area, as well as the lack of essential public services and utilities. In addition to these physical impediments, land use regulations, ordinances and codes, may restrict or deter growth and can be considered an impediment to growth.

The project site is currently developed and is within an established residential neighborhood served by existing roadways and public utilities. As discussed in Section 4.14, all utilities needed to serve the proposed development will be provided via existing infrastructure that will extend onto the project site. Based on the current developed status of the site as well as existing roadways and infrastructure that serve the site, implementation of the proposed project would not provide new access to an inaccessible area, and thus the project would not result in growth inducing impacts. Furthermore, the site is designated for residential development in the City's General Plan 2040 and as such would not result in a change in the site's designation that would allow for growth that has not previously been planned.

### 5.3.2 POPULATION AND ECONOMIC GROWTH

The proposed project would result in a temporary increase in construction-related job opportunities in the area. However, employment opportunities provided by construction would not likely result in household relocation by construction workers to the project area. Construction workers would likely be drawn from the labor force already residing in the City of Pacifica, surrounding communities, and the Bay Area region. Employment opportunities provided during the construction period would be temporary and would not constitute a substantial growth in employment.

Future residents on the project site would be comprised of Pacifica School District employees as well as a portion of new residents that could represent an addition to the region's labor force; however, it is not known to what extent people would move to the project site from other sites within the region or would be new residents in the region. The number of employed residents on the project site would be minimal in relation to the regional work force.

Given that implementation of the proposed project would not result in an increase in population beyond what has been considered in the City of Pacifica's General Plan, and provided that the city is primarily built out, opportunities for growth are limited. The increase in population and economic growth associated with the proposed project would not

contribute substantially to growth in the City of Pacifica and thus would not result in growth inducing impacts under this criterion.

### 5.3.3 URBANIZATION OF LAND IN ISOLATED LOCALITIES (LEAP-FROG DEVELOPMENT)

The project site is located in an urbanized area and surrounded by existing residential uses. As a project is consistent with the existing residential character of the surrounding area and is in line with residential growth envisioned in the City of Pacifica General Plan 2040. Given that implementation of the proposed project would not result in the urbanization of land in an isolated locality, it would not result in growth inducing impacts based on this criterion.

## 5.4 MANDATORY FINDINGS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines (Environmental Checklist) contains a list of mandatory findings of significance that may be considered significant impacts if any of the following occur:

1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of California history or prehistory?
2. Does the project have impacts that are individually limited, but cumulatively considerable?
3. Does the project have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly?

The following includes a discussion of the mandatory findings of significance for the proposed project.

### 5.4.1 QUALITY OF THE ENVIRONMENT

Implementation of the project could lead to adverse impacts to biological and cultural/tribal cultural resources, as discussed in sections 4.3, and 4.4 of this EIR. However, impacts of the project would be reduced to less than significant levels through incorporation of mitigation. Therefore, implementation of the project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or

animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of California history or prehistory provided all policies, rules, and regulations of all relevant governing bodies are adhered to, and the mitigation measures set forth in Sections 4.1, Aesthetics, 4.3 Biological Resources, and 4.4 Cultural and Tribal Cultural Resources are implemented.

#### 5.4.2 CUMULATIVE IMPACTS

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, transportation impacts of two nearby projects may be less than significant when analyzed separately but could result in a significant impact when analyzed together. An analysis of cumulative impacts allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately ascertain the effects of a series of projects.

Given that the immediate vicinity of the project site is largely built out, the cumulative context for analysis in this EIR is limited to existing development as well as two known projects located approximately 2 miles from the project site including the 36 townhome unit development known as the Hillside Meadows Subdivision and the 125 single family residential development known as the Linda Mar Woods Subdivision. As detailed in Sections 4.1 through 4.15 of this DEIR, impacts of the project would be less than significant or less than significant with incorporation of mitigation for all topic areas with the exception of impacts related to vehicle miles traveled (VMT) which are being addressed through implementation of a Transportation Demand Management (TDM) Plan intended to reduce single occupancy vehicle trips across the Pacifica School District. A brief analysis of cumulative impacts for each topical area analyzed in the DEIR is provided below.

- **Aesthetics.** The geographic scope for cumulative aesthetics impacts includes the immediate project vicinity. Development of the proposed project as well as projects considered in the cumulative context are required to adhere to all relevant local plans, Municipal Code regulations and proposed policies contained in the General Plan related to the preservation of aesthetic resources including design standards, landscape plans, and light regulations. Compliance with the City's development standards ensures that new development is compatible with its existing surrounding area and visually

compatible with existing land uses. As such, the project's contribution to potentially significant cumulative aesthetic impacts is not cumulatively considerable.

- **Air Quality.** The geographic scope for cumulative air quality impacts includes the Planning Area and the entire San Francisco Bay Area Air Basin (SFBAAB). The project would support the goals of the Bay Area 2017 Clean Air Plan adopted by BAAQMD, including all applicable control measures, and would not conflict with its implementation as detailed in Section 4.2 of this DEIR. Project-level air quality impacts will be mitigated through compliance with best management practices (BMPs) established by BAAQMD. Therefore, the project's contribution to potentially significant cumulative air quality impacts is not cumulatively considerable.
- **Biological Resources.** The geographic scope for cumulative biological resource impacts includes the project site, adjacent properties, and the broader Pacifica area. Development of the site has the potential to result in direct and indirect impacts to biological resources onsite including impacts to special-status animal species, and jurisdictional waters. However, incorporation of mitigation measures identified in this EIR will protect resources in place, will offset the loss of habitat, or will require re-establishment of habitat (e.g. planting replacement trees for removal of heritage and protected trees, replanting wetland plants at a 1:1 replacement ratio, etc.) which will reduce potential impacts to less than significant. The project would not result in impacts to wildlife movement corridors, nor would it conflict with a Habitat Conservation Plan. With incorporation of mitigation to reduce site-specific impacts to biological resources and due to the fact that there are no impacts to biological resources beyond the project site, the project's contribution to potentially significant cumulative impacts will not be cumulatively considerable.
- **Cultural and Tribal Cultural Resources.** The geographic scope considered for the cumulative cultural resource effects is the Planning Area as the conversion of undeveloped land to developed can result from individually minor but collectively significant projects taking place over time. While individual projects can avoid or mitigate the direct loss of specific resources, the effects could be cumulatively considerable. The project does not contain any historic resources and as such impacts to historic resources will not be cumulatively considerable. Though there is a potential to uncover archaeological resources, human remains, and tribal cultural resources during project construction, compliance with mitigation measures set forth in this EIR as well as state laws will reduce project impacts to less than significant and therefore the project's contribution to cumulative impacts will not be cumulatively considerable.
- **Geology and Soils.** The geographic scope considered for cumulative geology and soils is the project site and the broader San Francisco Bay Area region. This region is considered seismically active and development of the proposed and future projects would expose additional people and structures to potentially adverse effects associated with earthquakes, including seismic ground shaking and seismic related ground failure. However, the proposed and future projects are required to be constructed in accordance

with the most current version of the California Building Code, existing ordinances, and local building codes for seismic safety requirements and recommendations contained in each site-specific geotechnical report for each project. Therefore, the project's contribution to cumulative geology and soils impacts is not cumulatively considerable.

- **Greenhouse Gas Emissions.** The analysis of greenhouse gas (GHG) impacts is inherently cumulative as climate change is a global issue, and GHGs are global pollutants, unlike criteria air pollutants. No single emitter of GHGs is large enough to trigger global climate change on its own. As detailed in this EIR, the project is below the screening criteria for operation GHG emissions as set forth by BAAQMD and is consistent with GHG reduction strategies outlined in the Pacifica Climate Action Plan (PCAP) and as such, operational emissions are not expected to conflict with the City's ability to implement the GHG emissions reduction outlined in the PCAP. Additionally, the project would include mitigation measures identified in this EIR as well as incorporate energy-saving measures required by State and local energy policies, further reducing energy consumption, and thereby reducing GHG emissions. As such, the project's incremental contribution to cumulative GHG impacts is not cumulatively considerable.
- **Hazards and Hazardous Materials.** The geographic scope considered for cumulative hazards and hazardous materials impacts is the project area. Adverse effects of hazards and hazardous materials are localized and therefore, the area immediately surrounding the project site would be most affected by project activities. For the transport of hazardous materials, the geographic scope includes local and regional transportation facilities. While the project site likely contains asbestos, and lead, implementation of applicable federal, State, and local regulations as well as mitigation provided in this EIR would ensure impacts are reduced to less than significant. As with the proposed project, future projects would also be subject to compliance with applicable federal, State, and local regulatory requirements regarding the transport of hazardous materials, cleanup of hazardous materials, and the use and storage of hazardous materials during construction and operation. Though the project could result in exposure of people or structures to impacts involving wildland fires, compliance with State and local regulation as well as mitigation measures contained in this EIR will reduce impacts related to wildland fires to less than significant. Similarly, future projects would be subject to the same regulations. Through incorporation of mitigation measures and compliance with State and local regulations, the project, in conjunction with future projects would not result in cumulatively considerable hazards and hazardous materials impacts.
- **Hydrology and Water Quality.** The geographic scope considered for cumulative hydrology and water quality impacts is the San Pedro Creek watershed, within which the project site is located. The project, in combination with future development, could increase impervious surfaces resulting in a greater chance of flood and potential impacts to water quality. However, due to the substantially developed nature of the project site and greater Planning Area, as well as policies intended to improve stormwater management, provide flood controls, and reduce stormwater pollution, such as



stormwater permit requirements to retain and treat stormwater, the project's contribution to cumulative hydrology and water quality impacts would not be cumulatively considerable.

- **Land Use and Planning.** The geographic scope for cumulative impacts related to land use includes projects within Pacifica and particularly those proximate to the project site. Cumulative land use impacts would occur if other projects in the vicinity of the project site would result in land use impacts in conjunction with the proposed project. The project is consistent with the land use designation for site, which was changed to Low Density Residential as part of the recently adopted 2040 General Plan, and complies with all other land use plans, policies, and regulations. The project will not result in land use impacts and therefore, cumulative impacts to land use would not be cumulatively considerable.
- **Noise.** The geographic scope for cumulative noise impacts is the area immediately surrounding the project site. Though the project may result in temporary noise increases during construction, long term operational noise would result in less than significant impacts as the residential use would not generate noise in excess of established thresholds nor would it result in an increase in vehicular traffic such that it would increase existing ambient noise levels. As with the proposed project, future development would be subject to standard best management practices to reduce noise levels during construction and would similarly be required to quantify operational noise and provide mitigation as necessary to comply with established thresholds. As such, cumulative impacts to noise will not be cumulatively considerable.
- **Population and Housing.** The geographic scope for population and housing impacts is the City of Pacifica. The project site was redesignated as part of the 2040 General Plan Update to Low Density Residential, which allows for residential development on the project site. The introduction of 70 residential units is within the planned growth and as stated previously the project is consistent with land use and zoning regulations. The project's population increase is greater than the Hillside Meadows Subdivision project and less than the Linda Mar Woods Subdivision, but nevertheless is within the City's projected population growth. Furthermore, the project will not result in population or housing displacement. As such, the project's cumulative population and housing impacts will not be cumulatively considerable.
- **Public Services.** The geographic scope for cumulative impacts related to public services includes projects within Pacifica. Development of the project was determined to have a less than significant impact to public services. Though the project and cumulative projects would increase demands for police, fire, school, park, and library services due to the increase in residents, the demand for these services would not change significantly with implementation of the proposed project and cumulative projects. Similar to the proposed project, each of the cumulative projects would be individually subject to review by the police and fire departments and would be required to comply with all safety requirements to adequately address police and fire protection service demands. As with

the proposed project, the applicants of the cumulative projects would be required to pay developer fees to the appropriate school districts as applicable; and payment of these fees would fully mitigate any impact that the cumulative projects would have on school services. As such, implementation of the project and cumulative projects would not require construction of new facilities or expand existing facilities to accommodate increased demand and impacts to public services will not be cumulatively considerable.

- **Transportation and Traffic.** The geographic context for cumulative impacts related to transportation is the immediately surrounding area, the roadway network within the Planning Area, and the regional roadway network with connections to the Planning Area. Transportation impacts in the immediate area surrounding the site including geometric design hazards would be reduced to less than significant levels with incorporation of mitigation measures and would not be cumulatively considerable impacts as such impacts are site specific. Impacts of the project related to vehicle miles traveled (VMT) was determined to be significant and unavoidable and are therefore cumulatively considerable, though the project will be required to incorporate mitigation measures that seek to reduce single-occupancy vehicle trips, thereby reducing VMT impacts. As noted in the Section 4.13, Transportation and Traffic, residential development at the project site is anticipated by the 2040 General Plan, and the resulting significant and unavoidable and cumulative impacts were therefore already analyzed and considered in the 2040 General Plan EIR.
- **Utilities and Service Systems.** The geographic scope for cumulative impacts related to utilities and service systems includes projects within Pacifica. As detailed in this EIR, impacts of the project on utilities and service systems would be less than significant. Cumulative projects, as with the proposed project would be required to demonstrate available supply is present to support development. As the project would not result in impacts to utilities and service systems, resulting cumulative impacts would not be cumulatively considerable.
- **Wildfire.** The geographic scope for cumulative impacts related to wildfire includes projects within Pacifica. The project is not within a designated fire hazard severity zone, but is within the wildland urban interface (WUI). As detailed in this EIR, the project, with incorporation of State and local regulations to reduce the risk of wildfires would result in less than significant impacts. Similarly, cumulative projects located in the WUI and/or fire hazard severity zones would be subject to the same regulations. As such, cumulative wildfire impacts would not be cumulatively considerable.

As provided herein, residential development at the project site was considered in the recently adopted 2040 General Plan and General Plan EIR. The cumulative analyses provided in the 2040 General Plan EIR and herein demonstrate that the project, together with other development projects in the City of Pacifica will not result in cumulatively considerable impacts, with the exception of VMT.

### 5.4.3 ADVERSE EFFECTS ON HUMAN BEINGS

While human beings could be affected by a variety of impacts described above, the project would not result in environmental impacts that would cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts on people include air quality emissions, site soils and seismic activity, routine hazardous materials use, and wildfire risk; however, these impacts were determined to be less than significant or less than significant with mitigation. As such, the project would not expose people to substantial new hazards and there would be no other adverse effects on human beings.



# 6.0 ALTERNATIVES

## 6.1 CEQA REQUIREMENTS

### 6.1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the proposed project or to the location of the project that could feasibly avoid or lessen any significant impacts while substantially achieving the basic objectives of the proposed project. An EIR should also evaluate the comparative merits of the alternatives. This section sets forth potential alternatives to the proposed Pacifica School District Workforce Housing project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.
- The range of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- The No Project alternative shall be evaluated along with its impacts. The No Project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.
- The range of feasible alternatives should be selected and discussed in a manner intended to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure,

general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an alternative site.

### **6.1.2 PROJECT OBJECTIVES**

CEQA requires an analysis of alternatives that would feasibly attain most of the basic objectives of the project. As detailed in Chapter 3.0, Project Description of this Draft EIR, project objectives include the following:

- Provide high-quality housing for current and future staff members of the Pacifica School District
- Provide rental rates and lease terms that enable and improve the District's ability to retain and attract qualified faculty and staff
- Redevelop the underutilized site in response to the declining school-age population and provide workforce housing for the District's staff
- Contribute to the City of Pacifica's Regional Housing Needs Allocation (RHNA) goals by providing six (6) low income, five (5) moderate income, and 59 market rate units
- Maintain and expand recreational opportunities on site for use by the surrounding neighborhood, future residents, and organized recreational groups
- Optimize assets for the Pacifica School District to support its education mission

## **6.2 IMPACTS OF THE PROPOSED PROJECT**

To develop project alternatives, the City of Pacifica, as Lead Agency, considered the project objectives and reviewed the significant impacts of the proposed project, identified those impacts that could be substantially avoided or reduced through an alternative, and determined the appropriate range of alternatives to be analyzed. Chapter 4.0, Environmental Evaluation, of this Draft EIR evaluates the potential for the proposed project to result in significant impacts to the following resource areas: aesthetics; air quality; biological resources; cultural and tribal cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services; transportation; utilities and service system; wildfire; and all other environmental topics which include agricultural resources, energy, mineral resources, and recreation. The analysis in Chapter 4.0 concludes that implementation of the proposed project will result in significant and potentially significant impacts in ten resource areas including aesthetics, air quality, biological resources, cultural and tribal cultural resources, geology and soils, greenhouse gas emissions, hazards and

hazardous materials, noise, and transportation and traffic. With the exception of significant and unavoidable transportation impacts related to vehicle miles traveled (VMT), all significant and potentially significant impacts of the proposed project will be less than significant with incorporation of mitigation measures. A summary discussion of significant project impacts analyzed in the Draft EIR is presented below.

### 6.2.1 AESTHETICS

The analysis in Section 4.1, Aesthetics identifies a potentially significant impact associated with degradation of the existing visual character and quality of public views of the site and surrounding area (**Impact AES-3**) as a result of project implementation. With implementation of mitigation, the analysis found this impact to be reduced to a less than significant level with mitigation. The analysis concludes that all other project impacts on aesthetics including impacts to a scenic vista, scenic resources within a state scenic highway, and light and glare will be less than significant. The project will not result in significant and unavoidable aesthetics impacts.

### 6.2.2 AIR QUALITY

The analysis in Section 4.2, Air Quality identifies potentially significant impacts associated with violating air quality standards (**Impact AQ-2**) and from exposure of existing sensitive receptors to construction emissions of toxic air contaminants (**Impact AQ-3**). With incorporation of mitigation measures the analysis concludes that these impacts will be less than significant. Impacts associated with a conflict with an applicable air quality plan, and other emissions such as odors are identified as less than significant. The project will not result in significant and unavoidable air quality impacts.

### 6.2.3 BIOLOGICAL RESOURCES

The analysis in Section 4.3, Biological Resources identifies potentially significant impacts of the proposed project on special-status species (**Impact BIO-1**) as well as potential conflicts with local policies or ordinances protecting biological resources (**Impact BIO-5**). With implementation of mitigation measures, the analysis concludes that impacts will be less than significant. The analysis concludes that impacts of the project to federally protected wetlands and wildlife movement and habitat connectivity will be less than significant, and the project will have no impact to sensitive natural communities or as a result of conflicting with an adopted habitat conservation plan. The project will not result in significant and unavoidable impacts to biological resources.



#### 6.2.4 CULTURAL AND TRIBAL CULTURAL RESOURCES

The analysis in Section 4.4, Cultural and Tribal Cultural Resources identifies potentially significant impacts associated with archaeological resources (**Impact C/TCUL-2**), human remains (**Impact C/TCUL-3**), and tribal cultural resources (**Impact C/TCUL-4**). For all potentially significant impacts, mitigation measures are identified and the analysis concludes that impacts will be less than significant. Impacts to historical resources will be less than significant. The project will not result in significant and unavoidable cultural and tribal cultural resources impacts.

#### 6.2.5 GEOLOGY AND SOILS

The analysis in Section 4.5, Geology and Soils identifies potentially significant impacts associated with strong seismic ground shaking (**Impact GEO-1**), erosion from construction activities (**Impact GEO-2**), soil instability (**Impact GEO-3**), location on an unstable geologic unit and on expansive soils (**Impact GEO-4**), and paleontological resources (**Impact GEO-6**). The analysis concludes that potentially significant impacts will be reduced to less than significant with incorporation of mitigation measures. The proposed project does not involve installation of septic tanks and therefore the analysis concludes that there will be no impact associated with the project being located on soils incapable of adequately supporting the use of septic tanks. The project will not result in significant and unavoidable impacts related to geology and soils.

#### 6.2.6 GREENHOUSE GAS EMISSIONS

The analysis in Section 4.6, Greenhouse Gas Emissions identifies potentially significant impacts associated with the generation of greenhouse gas (GHG) emissions (**Impact GHG-1**). However, with implementation of mitigation measures, the analysis concludes that impacts resulting from project GHG emissions will be less than significant. Impacts resulting from a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions will be less than significant. The project will not result in significant and unavoidable impacts related to greenhouse gas emissions.

#### 6.2.7 HAZARDS AND HAZARDOUS MATERIALS

The analysis in Section 4.7, Hazards and Hazardous Materials identifies potentially significant impacts associated with release of hazardous materials into the environment (**Impact HAZ-2**), and as a result of exposure of people or structures to risk of loss, injury, or death involving wildland fires (Impact HAZ-7), however, with implementation of mitigation, impacts will be

reduced to less than significant. The analysis concludes that impacts associated with the routine transport, use, or disposal of hazardous materials, emission of hazardous materials within one-quarter mile of a school, proximity to an airport, and interference with emergency response and evacuation will be less than significant. The project will have no impact as a result of being located on a hazardous materials site. The project will not result in significant and unavoidable impacts related to hazards and hazardous materials.

#### **6.2.8 HYDROLOGY AND WATER QUALITY**

The analysis in Section 4.8, Hydrology and Water Quality does not identify any significant or potentially significant impacts to hydrology and water quality as a result of project implementation including the potential for site runoff to violate water quality standards, a decrease in groundwater supplies or interference with groundwater recharge, alteration of existing drainage patterns, pollutant release resulting from site inundation, or through conflict with a water quality control plan or sustainable groundwater management plan. The project will not result in significant and unavoidable impacts related to hydrology and water quality.

#### **6.2.9 LAND USE AND PLANNING**

The analysis in Section 4.9, Land Use and Planning demonstrates that the proposed project will not physically divide an established community nor will the project conflict with land use regulations established by the City of Pacifica including the General Plan, zoning ordinance, and Plan Bay Area. The project will not result in significant and unavoidable impacts related to land use and planning.

#### **6.2.10 NOISE**

The analysis in Section 4.10, Noise identifies potentially significant impacts related to increases in ambient noise during project construction (**Impact NOI-1**), however with mitigation impacts will be less than significant. Impacts related to increases in ambient noise during project operation and groundborne vibration and noise will be less than significant. The analysis concludes that there will be no impacts resulting from excessive noise associated with airport operations. The project will not result in significant and unavoidable impacts related to noise.

#### **6.2.11 POPULATION AND HOUSING**

The analysis in Section 4.11, Population and Housing concludes that the project will result in less than significant impacts related to substantial unplanned population growth and

displacement of housing or people. The project will not result in significant and unavoidable impacts associated with population and housing.

#### **6.2.12 PUBLIC SERVICES**

The analysis in Section 4.12, Public Services concludes that growth associated with the project has been planned for by the General Plan and will comply with applicable General Plan and Pacifica Municipal Code (PMC) regulations that ensure public services are adequately funded. Therefore, impacts of the project on public services including fire and police protection, schools, parks, and other public facilities will be less than significant. The project will not result in significant and unavoidable impacts to public services.

#### **6.2.13 TRANSPORTATION**

The analysis in Section 4.13, Transportation and Traffic identifies potentially significant impacts from an increase in hazards due to geometric design (**Impact TRA-3**), however, mitigation measures will reduce the impact to less than significant. Additionally, this Draft EIR identifies a significant project impact on VMT (**Impact TRA-2**) and VMT impact under cumulative conditions as detailed in Chapter 5.0, Other CEQA Considerations. Mitigation measures identified will not reduce VMT impacts to less than significant, and therefore, VMT impacts will be significant and unavoidable. All other traffic-related impacts will be less than significant.

#### **6.2.14 UTILITIES AND SERVICE SYSTEMS**

The analysis in Section 4.14, Utilities and Service Systems concludes that impacts related to relocation or construction of new or expanded utilities, water supply, wastewater treatment capacity, solid waste generation, and violations of federal, state, or local statutes and regulations related to solid waste will be less than significant. The project will not result in significant and unavoidable impacts to utilities and service systems.

#### **6.2.15 WILDFIRE**

The analysis in Section 4.15, Wildfire concludes that impacts related to wildfire risk, evacuation, emergency plans, and post-fire landslide, runoff, slope instability, and drainage changes will be less than significant. The project will not result in significant and unavoidable impacts related to wildfire.

#### **6.2.16 OTHER RESOURCE TOPICS**

Section 4.0, Environmental Evaluation provides a brief discussion of other resource topics

including agricultural and forestry resources, energy, mineral resources, and recreation. The analysis concludes that the project will have no impact to these resource topic areas based on the project location and characteristics. Therefore, no additional analysis or discussion of these topics is needed.

### **6.3 ALTERNATIVES CONSIDERED BUT NOT FURTHER STUDIED**

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and therefore merit in-depth evaluation, and which alternatives are infeasible. The following alternatives were considered and found to be infeasible as discussed below.

#### **6.3.1 ADAPTIVE REUSE OF EXISTING SCHOOL COMPLEX**

Based on the developed condition of the site, an alternative that would adaptively reuse the existing school building was considered. This alternative was determined to be infeasible based on the age and current condition of the building which, as detailed in the Hazards and Hazardous Materials discussion, contains asbestos and lead based paint, which would require full or partial abatement to ensure safety of future residents. In addition, reuse of the existing building would require modifications to increase energy efficiency and comply with seismic regulations. Furthermore, the objective of the project is to provide high quality housing for current and future staff members of the Pacifica School District. As proposed, the project includes 70 units. If the approximately 34,000 square foot school building were to be adaptively reused and converted to residential units, the resulting size of the units would be far less than that proposed by the project, with an average of only 485 square feet before considering common area, access, mechanical, and other needs. For reference, Pacifica Municipal Code section 9-4.2313(b) establishes a minimum dwelling unit size of 450 square feet for a studio unit (no bedrooms) and 600 square feet for a one-bedroom unit. In addition, other site modifications would be needed to accommodate parking, internal vehicular circulation, pedestrian and bicycle amenities, and other amenities associated with residential developments. Therefore, a project alternative that would adaptively reuse the existing school building is not evaluated in this Draft EIR.

#### **6.3.2 INCREASED DENSITY DEVELOPMENT**

An alternative that would increase density would be inconsistent with the site's General Plan designation, which allows for a maximum density of 9 dwelling units per acre. The project proposes the highest density allowed by the General Plan Land Use Designation. Furthermore, increased density at the site would result in increased activity and demand on

public services, which would likely result in increased impacts. Based on the inconsistency with the General Plan as well as the likely increase in the severity of impacts, an increased density development alternative is not evaluated in this Draft EIR.

### **6.3.3 ALTERNATIVE SITE LOCATION**

As provided in CEQA Guidelines Section 15126.6, analysis of an infeasible off-site alternative is not required. The key consideration is whether an off-site location is available that would feasibly attain most of the basic objectives of the proposed project. The primary objectives of the Pacifica School District Workforce Housing project are to provide housing within the city, including housing affordable to lower income households, and to redevelop an underutilized site owned by the Pacifica School District. The proposed project is in an area surrounded by single-family residences to the west, north. In addition to providing residential uses, the project also proposes to maintain the recreational field at the southern portion of the project site and will construct a restroom facility, both of which will be publicly available. No off-site alternative project location would meet the key project objectives of providing housing affordable to school district employees and staff, redeveloping an underutilized site owned by the Pacifica School District, preserving and expanding recreational opportunities for use by the surrounding community, and optimizing assets for the Pacifica School District. Therefore, an off-site alternative is not evaluated in this Draft EIR.

## **6.4 ALTERNATIVES EVALUATED**

Alternatives considered in this Draft EIR are intended to meet most of the project's objectives while eliminating or reducing significant and unavoidable impacts as identified in Section 4.0, Environmental Evaluation. Alternatives considered in this Draft EIR include:

- Alternative 1: No Project/No Development
- Alternative 2: Park Pacifica Highland Subdivision: 54 Single Family Residences
- Alternative 3: Variation of Site Layout and Unit Mix

Pursuant to CEQA Guidelines Section 15126.6(d), any additional significant effects of the alternatives are discussed in less detail than the significant effects of the proposed project. The following sections describe each alternative, analyze impacts of each alternative as compared to the proposed project, identify significant impacts of the proposed project that would be avoided or lessened by each alternative, assess each alternative's ability to meet the project objectives, and evaluate the comparative merits of the alternative and the proposed project.

### 6.4.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

#### ***Description***

Section 15125.6(e) of the State CEQA Guidelines requires the analysis of a No Project Alternative. This analysis must discuss existing conditions, as well as reasonably foreseeable future development if the proposed project were not to be approved, based on current plans, site zoning, and consistent with available infrastructure and community services. The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

As shown in Figure 4-3 of the 2040 General Plan, which was approved by City Council on July 11, 2022, the site has a General Plan Land Use Designation of Low Density Residential, which allows a density range of 3 to 9 dwelling units per acre. The corresponding zoning designation of the site is Single-Family Residential (R-1), which permits single family residential uses, day cares, and other uses by-right, and conditionally permits uses such as churches, schools, parks, and visitor accommodations.

The No Project alternative is the continuation of existing conditions on the project site, which is developed with the former Oddstad School complex, closed by the Pacifica School District in 2005, and used for storage since 2019. The site includes a single-story school complex, circulation improvements such as driveways, parking areas, and pedestrian pathways, recreational fields and courts, landscaping, fencing, and an undeveloped hillside area along the eastern portion of the site. The existing recreational fields are publicly accessible and are used for both organized sports and individual recreation activities. Under the No Project alternative, no physical alterations would be made, and the site would continue to be used as storage and publicly accessible recreation.

#### ***Analysis***

The following includes a discussion of the impacts of the No Project/No Development Alternative as compared to the proposed Pacifica School District Workforce Housing project.

#### ***Aesthetics***

Under the No Project/No Development Alternative, no construction, grading, tree and vegetation removal, or development would occur on the project site and the existing aesthetic characteristics would remain unchanged. As such, the No Project/No Development Alternative would avoid all potentially significant and less than significant impacts related to

aesthetics since the site would remain unchanged and in its current state.

#### *Air Quality*

Under the No Project/No Development Alternative, no construction activities would occur on the project site. Thus, this alternative would not generate any fugitive dust or other pollutant emissions. Furthermore, under the No Project/No Development Alternative, there would be no new area source emissions from the use of consumer products such as solvents, cleaners, paints, and operation of landscaping maintenance equipment nor would there be any new emissions associated with vehicles traveling to and from the project site by residents, delivery trucks, visitors, and recreational users. As such, relative to the proposed project, the No Project/No Development Alternative would avoid all potentially significant and less than significant air quality impacts.

#### *Biological Resources*

Under the No Project/No Development Alternative, no changes to the site, including removal of existing trees or vegetation, would occur. This alternative would avoid all impacts of the proposed project related to special-status species including impacts to the San Francisco dusky-footed woodrat, obscure bumblebee, California red-legged frog, bats, nesting birds, and the Choris' popcornflower. Additionally, there would be no direct or indirect impacts to identified wetlands. As such, relative to the proposed project, the No Project/No Development Alternative would avoid all potentially significant and less than significant impacts to biological resources.

#### *Cultural and Tribal Cultural Resources*

Under the No Project/No Development Alternative, no construction activities would occur that could result in the accidental discovery of archaeological resources, tribal cultural resources, or human remains. Therefore, this alternative would avoid all potentially significant and less than significant impacts to cultural and tribal cultural resources.

#### *Geology and Soils*

Under the No Project/No Development Alternative, no new development would occur, and all existing structures would remain in place. As such, the current building would not be modified to comply with current seismic regulations and any existing seismic hazards and geologic and soil instabilities to the existing school complex and shed building would remain unchanged. Under this alternative, impacts resulting from seismic hazards would be greater than the proposed project as the existing buildings are of an age that do not incorporate current building code standards that set forth regulations for seismic safety.



### *Greenhouse Gas Emissions*

No new construction would occur under the No Project/No Development Alternative, and as such GHG emissions associated with construction activities would not occur. The existing school building would continue to be used by the School District for storage and operations would involve the same level of GHG emissions as currently exists, which are negligible. As such, relative to the proposed project, the all potentially significant and less than significant GHG impacts would be avoided under the No Project Alternative.

### *Hazards and Hazardous Materials*

Under the No Project/No Development Alternative, the existing environmental conditions, including the presence of buildings containing lead-based paint and asbestos, would remain. All impacts identified as potentially significant and less than significant including transportation, use, and disposal of hazardous materials, release of hazardous materials, safety hazards associated with excessive airport noise, interference with an adopted emergency plan, and risks associated with proximity to a wildfire area would be avoided.

### *Hydrology and Water Quality*

This alternative would avoid impacts associated with construction activities including impacts to surface and groundwater water quality. Relative to the proposed project, the No Project/No Development Alternative would not implement design elements that could improve hydrology and water quality through installation of new drainage systems, bioretention features, and other low impact development design features.

### *Land Use and Planning*

Under the No Project/No Development Alternative, there would be no impacts related to division of a community. Conversely, because no housing development would occur, the No Project/No Development Alternative would be inconsistent with the City of Pacifica General Plan, which designates the site for development of low-density housing at a range of 3 to 9 dwelling units per acre. Therefore, the land use conflict of this alternative would be greater than that of the proposed project.

### *Noise*

No construction would occur under the No Project/No Development Alternative. As such, there would be no temporary increase in ambient noise associated with construction activities nor would there be any increase in operational noise. Similarly, this alternative would not generate groundborne vibration or noise as no construction activities would

occur. As such, the No Project/No Development Alternative would avoid the project's potentially significant and less than significant noise impacts.

#### *Population and Housing*

The No Project/No Development Alternative would not introduce housing to the project site and therefore, would not increase population or housing at the project site or in the City of Pacifica. As such, the No Project/No Development Alternative, like the proposed project would result in less than significant impacts to population and housing.

#### *Public Services*

This alternative would not induce additional demand for police or fire services beyond what currently exists. Because there would be no residents introduced under this alternative there would not be any induced additional demand on school services or other public facilities such as libraries. Under this alternative, the site would remain unchanged and as such use of the recreational fields would remain the same as current conditions. As with the proposed project, the No Project/No Development Alternative would result in a less than significant impact to public services.

#### *Transportation and Traffic*

Under the No Project/No Development Alternative, no development on the project site would occur and no new vehicle trips would be generated. Therefore, there would be no impacts related to VMT. Additionally, under this alternative, there would be no change to the existing site configuration, and as such there would be no impacts associated with a geometric design hazard nor result in inadequate emergency access. Under the No Project/No Development Alternative the project's potentially significant and less than significant impacts related to traffic, including the significant and unavoidable traffic impacts (project-specific and cumulative) associated with VMT would be avoided.

#### *Utilities and Service Systems*

The No Project/No Development Alternative would not generate an increase in demand for utilities and service systems beyond what currently serves the former Oddstad School. As with the proposed project, this alternative would result in less than significant impacts related to water supply, wastewater treatment, stormwater drainage, natural gas, electric, and telecommunication services, and solid waste generation.

#### *Wildfire*

Under the No Project/No Development Alternative no development on the site would occur

and all existing improvements including the single-story school complex, driveways, parking areas, pedestrian pathways, recreational fields and courts, landscaping, fencing, and undeveloped hillside would remain. The current building would not be modified to comply with Chapter 7A of the California Building Code for sites within the wildland urban interface (WUI) nor would the proposed project's Vegetation Management Plan be implemented. Under this alternative, there would be no impacts resulting from impairment of an adopted emergency response or evacuation plan or through installation of infrastructure that may exacerbate fire risk. Given that the site is adjacent to a steep hillside and within an area designated as WUI, under the No Project/No Development Alternative, impacts resulting from exposure of occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be greater than the proposed project as the existing buildings are of an age that do not incorporate current building code standards that set forth regulations related to vegetation management, non-combustible materials, and the location of vents, which are intended to increase fire resistance of buildings located within the WUI.

#### *Other Resource Topics*

Similar to the proposed project, the No Project/No Development Alternative would not affect agricultural resources as the site is not designated nor currently used as agricultural land, would not result in impacts related to wasteful, inefficient, or unnecessary consumption of energy resources or conflicts with plans for renewable and energy efficiency, would not result in loss of availability of known mineral resources as none are located on or adjacent to the site, and would not result in impacts to recreational facilities as the use of existing recreational facilities onsite would remain unchanged.

#### **Conclusion**

The following summarizes impacts of the No Project/No Development Alternative as compared to the proposed project and the alternative's ability to meet the stated project objectives.

#### *Avoid or Substantially Lessen Project Impacts*

The No Project/No Development Alternative would avoid or reduce project impacts related to aesthetics, air quality, biological resources, archaeological resources, human remains, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, public services, transportation, and utilities and service systems. Relative to the proposed project, the No Project/No Development Alternative would avoid construction related impacts as no physical development would occur. However, as discussed above, this

alternative would not abate hazards associated with lead based paint and asbestos contained within the existing building and would present greater wildfire hazards as compared to the project as it would not incorporate fire resistant building techniques or implement the Vegetation Management Plan of the proposed project. Furthermore, the No Project/ No Development Alternative would conflict with the General Plan as it would not achieve the property's, highest and best use or realize residential development as provided by the land use designation.

#### *Attain Project Objectives*

The No Project/No Development Alternative would fail to meet all stated project objectives, would be inconsistent with the General Plan objectives and land use designations, and would not provide housing needed to meet the city's RHNA obligation.

### **6.4.2 ALTERNATIVE 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES**

#### ***Description***

The Park Pacifica Highland Subdivision: 54 Single Family Residences alternative represents an alternative that could occur based on the existing Low Density Residential General Plan Land Use designation, R-1 zoning designation, and underlying single family residential subdivision, originally recorded in 1965 with the County of San Mateo. The subdivision includes 56 single family lots, two remainder lots adjacent to the city-owned Frontierland Park, and four dedicated public rights-of-way. Since recordation of the subdivision in 1965, Lots 54 and 55, along Big Bend Drive to the north of the project site, have been developed. As such, lots 54 and 55 are presumed to no longer be part of the subdivision and are therefore not considered in this alternative.

Under this alternative, the existing lots on the project site would be used for development rather than a re-subdivision of the land as proposed with the project. The entire 12.49-acre site, with the exception of the approximately 2.02-acre hillside area to the east (referred to as Lot D on the subdivision map), would be developed with single-family residences, including the existing recreational field at the southern portion of the site. Of the 54 single family residences, this alternative assumes construction of 16 accessory dwelling units (ADUs) for a total of 70 units on 54 lots. Development of the single-family residences and ADUs would be subject to regulations contained in Section 9-4.402 of the Pacifica Municipal Code, which permits a maximum of 40% lot coverage, and maximum building height of 35-feet. In addition, development of 54 single family residences and 16 ADUs would be subject to the minimum setbacks, landscaping, and parking requirements of the Municipal Code.

Under this alternative, new water, sewer, and storm drain facilities would be installed to accommodate the residential units and the four dedicated rights-of-way shown on the subdivision map would be paved, and curb, gutter, and sidewalks would be installed.

### ***Analysis***

The following includes a discussion of the impacts of the Park Pacifica Highland Subdivision: 54 single family Residences Alternative as compared to the proposed Pacifica School District Workforce Housing project.

#### ***Aesthetics***

Under the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative, the entire site, apart from the undeveloped hillside area along the eastern portion of the property, would be developed with single-family residences and associated improvements such as landscaping, fencing, sidewalks, curbs, gutters, and the four public rights-of-way shown on the Park Pacifica Highland Subdivision Map. As compared to the proposed project, this alternative would increase the overall site disturbance as it would result in development of the recreational field at the southern portion of the site, however, given the existing single-family residential character of the surrounding area, distance from eligible State Scenic Highways, limits on height established by the zoning designation, and general city regulations to reduce offsite light and glare, impacts under this alternative would be the same as the proposed project.

As compared to the proposed project, this alternative would result in a greater impact to the existing visual character as additional protected trees along Oddstad Boulevard and throughout the project site would be removed to accommodate the four public rights-of-way and individual single family-residences. Similar to the proposed project, **Mitigation Measures AES-1** would be required to address removal of protected trees.

#### ***Air Quality***

Air quality impacts resulting from the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would be the same as the proposed project. As with the proposed project, this alternative would be consistent with the 2017 Bay Area Clean Air Plan (CAP) as it would include (1) infill development on a previously developed site within existing urban limits and consequently would limit urban sprawl, (2) would implement best management practices (BMPs) set forth by the Bay Area Air Quality Management District (BAAQMD) to protect air quality during construction, and (3) would fall below the screening criteria level for single-family residential uses (325 du for operation and 114 du for construction) and thus

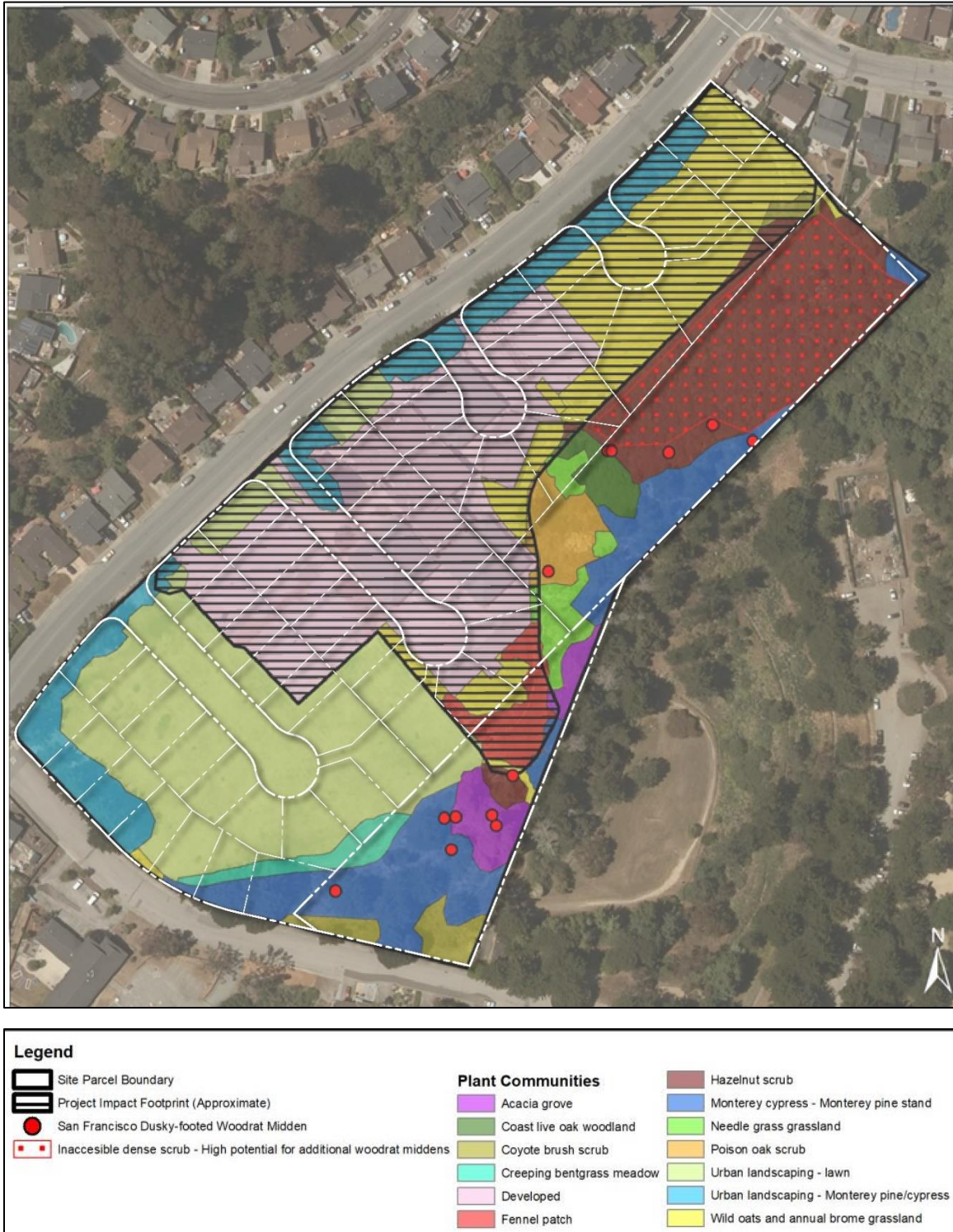
would not be result in significant air quality impacts. Similar to the proposed project, this alternative would not conflict with the regional air quality plan and with implementation of **Mitigation Measures AQ-1** and **AQ-2** would not result in a cumulatively considerable increase in criteria pollutants during construction or at operation or result in significant impacts to sensitive receptors. As a residential use, similar to the proposed project, localized odors during construction would be temporary and not likely noticeable beyond the limits of the site and would not generate odors during operation. As such, air quality impacts of this alternative would be the same as the proposed project.

#### *Biological Resources*

The Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would increase the area of disturbance on the site and would consequently result in an increase in impacts to biological resources as compared to the proposed project. In addition to increasing the severity of impacts, under this alternative, additional potentially significant impacts would occur to special-status plant species, sensitive natural communities, seasonal wetlands, and jurisdictional features. As shown in Figure 6-1, additional impacts would potentially occur to the San Francisco dusky-footed woodrat and sensitive natural communities as compared to the proposed project. Specifically, development at the southern portion of the site would result in disturbance to additional middens observed during the site survey conducted for the Biological Resources Analysis as well as along the eastern portion of the site which currently contains inaccessible dense scrub that supports habitat for the woodrat. Similarly, this alternative would result in removal of sensitive natural communities at the southern and northern portions of the project site. As shown in Figure 6-1, this alternative would also result in additional impacts to seasonal wetlands and jurisdictional features.

As with the proposed project, impacts to the San Francisco dusky-footed woodrat, obscure bumblebee, California red-legged frog, bats, and birds would be reduced to less than significant with implementation of **Mitigation Measures BIO-1** through **BIO-6**, however, impacts to the Choris' popcornflower, seasonal wetlands, and jurisdictional features would be more impactful under this Alternative relative to the proposed project. Similar to the proposed project, this alternative would result in removal of protected trees, however, with implementation of **Mitigation Measure AES-1** impacts to protected trees would be the same as the proposed project. Impacts to wildlife movement would be the same as the proposed project, and as there is no adopted Habitat Conservation plans within the project area, like the proposed project, there would be no impacts under this alternative.



**FIGURE 6-1: ALTERNATIVE 2 - ADDITIONAL IMPACTS TO SPECIAL-STATUS SPECIES AND HABITATS**



**FIGURE 6-2: ALTERNATIVE 2 - ADDITIONAL IMPACTS TO WETLANDS****Legend**

Site Parcel Boundary	<b>Wetlands and Saturated Areas</b>	<b>Non-Jurisdictional Waters</b>
Site Plan Overlay (approximate)	Saturated	Concrete Drainage Ditch
1m Saturated Area	Saturated (irrigation leak)	Earthen Drainage Ditch
Wetland Delineation Sample Point	Seasonal Wetland	<b>US Jurisdictional Waters</b>
Storm Drain	4' high brick retaining wall	Concrete Drainage Ditch

### *Cultural and Tribal Cultural Resources*

Under the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative, impacts to cultural and tribal cultural resources would be the same as the proposed project. Potentially significant impacts to archaeological resources, human remains, and tribal cultural resources could result if such resources were encountered during construction. As with the proposed project, under this alternative, implementation of **Mitigation Measures C/TCUL-1 and C/TCUL-2** would be required.

### *Geology and Soils*

Given that this alternative would be subject to the same geologic conditions and setting as the proposed project, impacts resulting from substantial direct or indirect risks to life or property as a result of strong seismic ground shaking, liquefaction, landslides, lateral spreading, subsidence, and erosion as well as direct or indirect impacts to paleontological or unique geologic features would be the same as the proposed project. This alternative would be subject to the same mitigation measures as the proposed project including preparation of a design level geotechnical analysis and incorporation of all recommendations provided therein (**Mitigation Measure GEO-1**), compliance with regulations set forth in the Municipal Code as it relates to implementation of stormwater control measures (**Mitigation Measure GEO-2**), and steps to take in the event that paleontological resources are encountered during construction (**Mitigation Measure GEO-3**). As with the proposed project, the 54 single family residences under this alternative would connect to the existing sewer system. As such impacts related to septic tanks would be the same as the proposed project.

### *Greenhouse Gas Emissions*

Though the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would result in construction of fewer dwelling units as compared to the proposed project, a greater portion of the site would be disturbed, and it is assumed that more building materials would be utilized as the detached single-family residences would be larger than the proposed townhome and flat units proposed by the project. As with the proposed project, this alternative would be subject to **Mitigation Measures AQ-2 and GHG-1**, which are aimed at reducing construction-related GHG emissions. At operation, GHG impacts would be similar to the proposed project and would not require additional mitigation. This alternative would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and as such would result in the same impacts as the proposed project.

### *Hazards and Hazardous Materials*

Under the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative, impacts resulting from the routine transport, use, or disposal of hazardous materials, use of hazardous materials within one-quarter mile of a school, exposure of people residing on the site to airport noise, interference with an emergency response or evacuation plan, and risk of loss, injury or death involving wildland fires would be the same as the proposed project. As with the proposed project, under this alternative the existing buildings onsite would be demolished to accommodate construction of 54 single-family residences which could result in the release of hazardous materials into the environment. As such, this alternative would be subject to **Mitigation Measure HAZ-1** to ensure the proper demolition and disposal of asbestos containing material and lead-based paint. The project site is not identified as a hazardous materials site and as such, impacts resulting from being located on such a site would be the same as the proposed project. With implementation of mitigation measures impacts resulting from hazards and hazardous materials under this alternative would be the same as the proposed project and no additional mitigation measures would be required.

#### *Hydrology and Water Quality*

The Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would result in an increase in impervious areas as compared to the proposed project. As such, impacts related to water quality, groundwater recharge, soil erosion, runoff, and flooding would be greater as compared to the proposed project. As with the proposed project, this alternative would be subject to regulations intended to protect water quality and reduce soil erosion and runoff such as implementation of BMPs during construction, and preparation of a stormwater control plan and stormwater pollution prevention plan. Through compliance with standard regulations, impacts to water quality, groundwater recharge, soil erosion, runoff, and flooding would be reduced to less than significant, as with the proposed project.

#### *Land Use and Planning*

Under the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative, no physical division of an established community would occur as this alternative would result in construction of 54 single-family residences in an established residential area. Under this alternative, single-family residence would be established on a site zoned for single-family uses and would therefore not conflict with applicable land use regulations. As with the proposed project, land use and planning related impacts would be less than significant.

#### *Noise*

Similar to the proposed project, the Park Pacifica Highland Subdivision: 54 Single Family



Residences Alternative would result in temporary noise and vibration during construction. To address potential impacts **Mitigation Measure NOI-1** imposes noise abatement strategies which would reduce impacts to less than significant. Though this alternative would result in a greater project footprint, the same noise abatement measures would be required during construction and as such impacts would be the same as the proposed project. At operation, the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would generate noise typical of a single-family residential subdivision and similar to the proposed project would result in less than significant impacts. Under this alternative, the site would be subject to the same impacts as the proposed project as it relates to exposing people residing in the project area to excessive noise levels as a result of being locating in an airport land use plan.

#### *Population and Housing*

Under this alternative, the same number of residential units would be constructed as compared to the proposed project and as such the resulting population would be the same. Impacts related to substantial population growth would therefore be the same as compared to the proposed project. Impacts resulting from displacement of housing units or people would be less than significant, as with proposed project, as there are no existing housing units onsite.

#### *Public Services*

Under this alternative the same number of housing units would be constructed as compared to the proposed project, and as such demand for police, fire, school, library, and other public services would be the same. Unlike the proposed project, this alternative would remove the recreational field at the southern portion of the site and as such there would be fewer recreational opportunities available to project residents and the surrounding neighborhood as compared to the proposed project. However, this alternative would be subject to applicable development impact fees intended to offset incremental increase in use of park facilities. 54 single-family units would not necessitate the expansion or construction of new parks that could result in substantial adverse physical impacts to the environment and therefore impacts of this alternative to public services would be less than significant, as with the proposed project.

#### *Transportation and Traffic*

Under the proposed project, VMT impacts were determined to be significant and unavoidable. Under the Park Pacifica Highland Subdivision: 54 Single Family Residences

Alternative, VMT impacts would be significant as the single-family residences would generate a VMT per capita equivalent to the average for the project site, which is above the existing city wide average VMT per capita and therefore exceeds the threshold of 15% below the existing citywide average. There are no feasible mitigation measures that could reduce VMT impacts of this alternative to levels below significance, and therefore impacts under this alternative would be the same as the proposed project. This alternative would result in construction of additional residential uses to a site surrounded by other residential uses. Development of the site under this alternative would be subject to all applicable policies and regulations related to parking, bicycle and pedestrian facilities, site design, and emergency access. As with the proposed project, compliance with applicable regulations would result in less than significant impacts to transportation and traffic including as a result of a conflict with applicable policies, plans, or programs, design hazards, or as a result of inadequate emergency access.

#### *Utilities and Service Systems*

Under this alternative, the same number of residential units would be constructed as compared to the proposed project, however, impacts would be greater than the proposed project as individual single-family residences would generate increased demand on public utilities as compared to the multi-family units proposed by the project. Though this alternative would generate more demand as compared to the proposed project, residential development at the site has been envisioned in the city's General Plan and as such impacts to utilities including impacts to water, wastewater, stormwater, natural gas and other utilities, and solid waste, would remain at less than significant levels, as with the proposed project.

#### *Wildfire*

Under this alternative, as with the proposed project, impacts due to a conflict with an adopted emergency response or evacuation plan would continue to be less than significant as the increase in trips on surrounding roadways would be nominal and capacity would be sufficient for access to or from the site in the event of an emergency. As with the proposed project, this alternative would be required to comply with Chapter 7A of the California Building Code which sets forth requirements for development of sites located within the WUI. Compliance with applicable regulations intended to increase fire resistance of buildings as well as implementation of a vegetation management plan will ensure impacts associated with exacerbating wildfire risks would be less than significant, as with the proposed project. The Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would

construct four new dead-end public rights-of-way to access individual single-family residences, however, these roadways would not exacerbate wildfire risk and impacts of this alternative would be the same as the proposed project. This alternative would also maintain the eastern hillside of the site for defensible space, and as noted above would implement a vegetation management plan. As such, impacts to wildfire under this alternative would be the same as the proposed project.

#### *Other Resource Topics*

Similar to the proposed project, the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would not affect agricultural resources as the site is not designated nor currently used as agricultural land, would not result in impacts related to wasteful, inefficient, or unnecessary consumption of energy resources or conflicts with plans for renewable and energy efficiency, and would not result in loss of availability of known mineral resources as none are located on or adjacent to the site.

Under this alternative the existing recreational field located at the southern portion of the site would be removed, and as such impacts to recreational facilities would be greater as compared to the proposed project. Based on the size of this alternative, existing recreational facilities in the vicinity of the project site, and the requirement to pay in-lieu fees to offset incremental increase in use of park facilities, impacts resulting from use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would occur would be less than significant. Similarly, this alternative would not necessitate construction or expansion of recreational facilities that could result in adverse physical impacts on the environment and impacts would be less than significant. As such, though this alternative would result in greater impacts to recreation as compared to the proposed project, impacts would be less than significant, and no mitigation would be required.

#### **Conclusion**

The following summarizes impacts of the Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative as compared to the proposed project and the alternative's ability to meet the stated project objectives.

#### *Avoid or Substantially Lessen Project Impacts*

The Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would result in new or increased impacts to biological resources, hydrology and water quality, recreation, utilities and service systems. Impacts to aesthetics, air quality, archaeological resources,

human remains, geology and soils, greenhouse gas emissions, land use and planning, noise, public services, transportation, and wildfire would be similar or the same as the proposed project.

#### *Attain Project Objectives*

The Park Pacifica Highland Subdivision: 54 Single Family Residences Alternative would fail to meet some of the stated project objectives as it would not provide workforce housing for current and future staff members of the Pacifica School District, would not provide rental rates and lease terms that enable and improve the District's ability to retain and attract qualified faculty and staff, and would not maintain and expand recreational opportunities on site for use by the surrounding neighborhood, future residents, and organized recreational groups.

### **6.4.3 ALTERNATIVE 3: VARIATION OF SITE LAYOUT AND UNIT TYPES**

#### ***Description***

The Variation of Site Layout and Unit Types Alternative assumes that Lot 1, at the southern portion of the project site, would be retained as a recreational field for use by the public, and Lots 2 and 3, totaling 7.47 acres would be developed in a varied layout and with a different unit mix as compared to the proposed project. Under this alternative, Building A, located at the eastern portion of Lot 2 would be relocated to the area of Buildings B1 and B2 and would include an additional floor with 14 units. The height of Building A would increase from 30-feet to approximately 40-feet. Under this alternative, the site would be rezoned from R-1 to Planned Development (P-D), which provides for flexibility in building height if the findings in Section 9-4.2211(a) of the PMC can be made. In addition to modification of the location of Building A, under this alternative, Building B3 would be modified to eliminate two units for a total of four units. Under this alternative, the unit count and mix would be as follows:

- Building A (41 units)
  - ♦ 32 one-bedroom
  - ♦ 9 two-bedroom
- Building B3
  - ♦ 2 two-bedroom
  - ♦ 2 three-bedroom
- Buildings C1 and C2 (no change)
  - ♦ 2 two-bedroom
  - ♦ 2 three-bedroom
- Building D (no change)
  - ♦ 11 one-bedroom



- ♦ 6 two-bedroom

### ***Analysis***

The following includes a discussion of the impacts of the Variation of Site Layout and Unit Types Alternative as compared to the proposed Pacifica School District Workforce Housing project.

#### ***Aesthetics***

As with the proposed project, Variation of Site Layout and Unit Types Alternative would result in a potentially significant impact associated with degradation of the existing visual character and quality of public views of the site and surrounding area however, as this alternative would result in construction of one building with three stories as opposed to two, impacts to scenic vistas including views of the San Pedro and Montara Ranges would be greater as compared to the proposed project. Though impacts would be greater as compared to the proposed project, the three-story residential building would be generally consistent with surrounding residential uses and would be located in the central portion of the site, providing a buffer between existing single-family residences to the north. As with the proposed project, implementation of **Mitigation Measure AES-1** would be required for this alternative, which would ensure impacts related to degradation of the existing character as it relates to the removal of mature trees are reduced to a less than significant. All other impacts to aesthetics including impacts to a scenic vista, scenic resources within a state scenic highway, and light and glare would be the same as compared to the proposed project.

#### ***Air Quality***

Similar to the proposed project, with implementation of **Mitigation Measures AQ-1** and **AQ-2**, the Variation of Site Layout and Unit Types Alternative would not result in a cumulatively considerable increase in criteria pollutants during construction or at operation or result in significant impacts to sensitive receptors. As with the proposed project, impacts due to a conflict with an applicable air quality plan, and other emissions such as odors will remain at less than significant.

#### ***Biological Resources***

The Variation of Site Layout and Unit Types Alternative would relocate Building A, providing for a greater distance from special-status species located onsite and would consequently result in decreased impacts to biological resources as compared to the proposed project. Though impacts to biological resources would be less under this alternative, as with the proposed project, implementation of **Mitigation Measures BIO-1** through **BIO-9** and **AES-1**

would be required to reduce impacts to the San Francisco dusky-footed woodrat, obscure bumblebee, California red-legged frog, bats, birds, protected waters, and protected trees to less than significant. Impacts to wildlife movement under this alternative would be the same as the proposed project, and as there is no adopted Habitat Conservation plans within the project area, like the proposed project, there would be no impacts under this alternative.

#### *Cultural and Tribal Cultural Resources*

Under the Variation of Site Layout and Unit Types Alternative, impacts to cultural and tribal cultural resources would be the same as the proposed project. Potentially significant impacts to archaeological resources, human remains, and tribal cultural resources could result if such resources were encountered during construction. As with the proposed project, under this alternative, implementation of **Mitigation Measures C/TCUL-1 and C/TCUL-2** would be required.

#### *Geology and Soils*

Under the Variation of Site Layout and Unit Types Alternative all elements of the proposed project would remain, except Building A would be relocated, and the number of units in Building B3 would be reduced by 2. Given that this alternative would be subject to the same geologic conditions and setting as the proposed project and would construct all other buildings and improvements the same as the proposed project, impacts to geology and soils under this alternative would be the same as the proposed project. Given that this alternative would install a three-story versus two-story building, specific geotechnical recommendations would need to be established. However, as with the proposed project, this alternative would be subject to **Mitigation Measure GEO-1** which requires implementation of design-specific geotechnical recommendations as well as measures **GEO-2** and **GEO-3**. The Variation of Site Layout and Unit Types Alternative would connect to the existing sewer system and therefore would not result in impacts related to septic tanks.

#### *Greenhouse Gas Emissions*

The Variation of Site Layout and Unit Types Alternative would result in construction of the same number of dwelling units and substantially the same disturbed area as compared to the proposed project. As such, GHG impacts are presumed to be the same as compared to the proposed project. During construction, this alternative would be subject to **Mitigation Measure GHG-1**, which is aimed at reducing construction-related GHG emissions. At operation, GHG impacts would be the same as compared to the proposed project as there would be the same number of dwelling units, and consequently the same GHG emissions

would be generated. This alternative would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and as such would result in the same impacts as the proposed project.

#### *Hazards and Hazardous Materials*

Under the Variation of Site Layout and Unit Types y Alternative, impacts resulting from the routine transport, use, or disposal of hazardous materials, use of hazardous materials within one-quarter mile of a school, exposure of people residing on the site to airport noise, interference with an emergency response or evacuation plan, and risk of loss, injury or death involving wildland fires would be the same as the proposed project. As with the proposed project, under this alternative the existing buildings onsite would be demolished to accommodate construction of the residential development which could result in the release of hazardous materials into the environment. As such, this alternative would be subject to **Mitigation Measure HAZ-1** to ensure the proper demolition and disposal of asbestos containing material and lead-based paint. The project site is not identified as a hazardous materials site and as such, impacts resulting from being located on such a site would be the same as the proposed project. With implementation of mitigation measures impacts resulting from hazards and hazardous materials under this alternative would be the same as the proposed project and no additional mitigation measures would be required.

#### *Hydrology and Water Quality*

The Variation of Site Layout and Unit Types Alternative would result in a marginal difference in impervious areas as compared to the proposed project. As such, impacts related to water quality, groundwater recharge, soil erosion, runoff, and flooding would be substantially the same as compared to the proposed project. As with the proposed project, this alternative would be subject to regulations intended to protect water quality and reduce soil erosion and runoff such as implementation of BMPs during construction, and preparation of a stormwater control plan and stormwater pollution prevention plan. Through compliance with standard regulations, impacts to water quality, groundwater recharge, soil erosion, runoff, and flooding would be reduced to less than significant, and as stated above would be substantially the same as compared to the proposed project.

#### *Land Use and Planning*

Under Variation of Site Layout and Unit Types Alternative, land use and planning impacts would be the same as the proposed project. No physical division of an established community or conflict with land use regulations would occur as this alternative would result

in redevelopment of an underutilized site within an established residential area on a site zoned for residential use. Therefore, as with the proposed project, land use and planning related impacts under this alternative would be less than significant.

#### *Noise*

Similar to the proposed project, the Variation of Site Layout and Unit Types Alternative would result in temporary noise and vibration during construction. Though this alternative would result in construction of fewer buildings than the proposed project, compliance with **Mitigation Measure NOI-1** would be required to reduce noise impacts during construction to less than significant. At operation, the Variation of Site Layout and Unit Types Alternative would generate the same noise levels as compared to the proposed project as it would introduce the same number of residential units. As with the proposed project noise at operation would be typical of residential land uses and impacts would continue to be less than significant. Under this alternative, the site would be subject to the same impacts as the proposed project as it relates to exposing people residing in the project area to excessive noise levels as a result of being located in an airport land use plan.

#### *Population and Housing*

Under this alternative, the same number of residential units would be constructed as compared to the proposed project and as such the resulting population would be the same. Impacts related to substantial population growth would therefore be the same as the proposed project. Impacts resulting from displacement of housing units or people would be the same as the proposed project as there are no existing housing units onsite.

#### *Public Services*

Under the Variation of Site Layout and Unit Types Alternative the same number of residential units would be constructed as compared to the proposed project, and as such demand for police, fire, school, library, recreational, and other public services would be the same as the proposed project.

#### *Transportation and Traffic*

Under the proposed project, VMT impacts were determined to be significant and unavoidable. Under the Variation of Site Layout and Unit Types Alternative, the same number of units at the same affordability rates would be constructed and would therefore exceed the threshold of 15% below the existing citywide average and impacts would be significant. For the reasons discussed in Section 4.13, Transportation and Traffic, there are no feasible mitigation measures that could reduce VMT impacts of this alternative to levels below

significance, and therefore impacts under this alternative would be the same as the proposed project. Though impacts under this alternative would be significant and unavoidable, implementation of **Mitigation Measure TRA-1 and TRA-2** would still be required.

All other transportation and traffic impacts under the Variation of Site Layout and Unit Types Alternative would be the same as the proposed project. With implementation of **Mitigation Measures TRA-3 and TRA-4**, impacts would be reduced to less than significant as with the proposed project.

#### *Utilities and Service Systems*

Under this alternative, the same number of residential units would be constructed as compared to the proposed project, and as such demand on public utilities as compared to the proposed project would be the same. Impacts to utilities including impacts to water, wastewater, stormwater, natural gas and other utilities, and solid waste, would remain at less than significant levels, as with the proposed project.

#### *Wildfire*

Under the Variation of Site Layout and Unit Types Alternative, a greater degree of defensible space would be provided as Building A, which is located nearest to the undeveloped hillside, would be relocated. As such, impacts related to wildfire would be less than the proposed project. As with the proposed project, this alternative would be required to comply with Chapter 7A of the California Building Code related to WUI requirements and would also be required to implement a vegetation management plan. Through compliance with applicable regulations impacts associated with exacerbating wildfire risks as a result of the Variation of Site Layout and Unit Types Alternative would be less than significant, as with the proposed project.

#### *Other Resource Topics*

Similar to the proposed project, the Variation of Site Layout and Unit Types Alternative would not affect agricultural resources as the site is not designated nor currently used as agricultural land, would not result in impacts related to wasteful, inefficient, or unnecessary consumption of energy resources or conflicts with plans for renewable and energy efficiency, would not result in loss of availability of known mineral resources as none are located on or adjacent to the site, and would not result in impacts to recreational facilities as the use of existing recreational facilities onsite would remain unchanged. As such, impacts to other resource topics would be the same as the proposed project.

### **Conclusion**

The following summarizes impacts of the Variation of Site Layout and Unit Types Alternative as compared to the proposed project and the alternative's ability to meet the stated project objectives.

#### *Avoid or Substantially Lessen Project Impacts*

The Variation of Site Layout and Unit Types Alternative would result in decreased or substantially similar impacts as the proposed project to all resource areas including aesthetics, air quality, biological resources, archaeological resources, human remains, geology and soils, greenhouse gas emissions, hazards, hydrology, land use and planning, noise, population and housing, public services, transportation, utilities, and wildfire. All mitigation measures identified for the proposed project would be applicable to the Variation of Site Layout and Unit Types Alternative and no additional mitigation measures would be needed.

#### *Attain Project Objectives*

The Variation of Site Layout and Unit Types Alternative would meet all of the project objectives.

## **6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the State CEQA Guidelines require that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Under the No Project/No Development Alternative, no physical changes would occur on the project site, and no new environmental impacts beyond what currently exists would occur. As such, the No Project/No Development alternative is considered the environmentally superior alternative as it would reduce or eliminate short-term, long-term, and cumulative impacts in all categories when compared to the proposed project.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the project objectives, and an alternative's ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. As stated above and as shown in Table 6-1, the No Project/No Development alternative would be the environmentally

superior alternative because it would eliminate all of the potentially significant impacts of the proposed project. However, while the No Project/No Development alternative is the environmentally superior alternative, it is not capable of meeting any of the project objectives.

After the No Project alternative, the environmentally superior alternative is that which would result in the fewest or least significant environmental impacts. Based on the analysis contained herein and as shown in Table 6-1, Alternative 3: Variation of Site Layout and Unit Types Alternative is the environmentally superior. Though this alternative would not avoid the proposed project's significant and unavoidable transportation impacts, it is an environmentally superior project alternative because it would construct the same amount of units in fewer buildings as compared to the proposed project which would reduce all other potentially significant impacts as compared to the proposed project. This alternative is considered environmentally superior, and would achieve the stated project objectives.



**TABLE 6-1: COMPARISON OF PROJECT ALTERNATIVES**

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: NO PROJECT/NO DEVELOPMENT	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
AES-1	Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.	LTS/LTS	NI	=	+
AES-2	Implementation of the proposed project would not substantially damage scenic resources, including, trees, rock outcroppings, and historic buildings within a state scenic highway.	LTS/LTS	NI	=	=
AES-3	Development of the project site would substantially degrade the visual character and quality of public views of the site and its surroundings.	PS/LTS	NI	+	=
AES-4	The project would not create a new source of substantial light or glare which would adversely affect day or nighttime	LTS/LTS	NI	=	=
AQ-1	Implementation of the proposed Pacifica School District Workforce Housing project would not conflict with or obstruct implementation of an applicable air quality plan.	LTS/LTS	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
AQ-2	Construction and operation of the proposed project would generate emissions that would result in a cumulatively considerable net increase of any critical pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	PS/LTS	NI	=	=
AQ-3	Implementation of the proposed project would potentially expose sensitive receptors to substantial pollutant concentrations.	PS/LTS	NI	=	=
AQ-4	Implementation of the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTS/LTS	NI	=	=
BIO-1	The project could result in a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	PS/LTS	NI	+	-

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
BIO-2	The project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.	NI/NI	NI	+	=
BIO-3	The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS/LTS	NI	+	=
BIO-4	The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	LTS/LTS	NI	=	=
BIO-5	The project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	PS/LTS	NI	+	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
BIO-6	The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	NI/NI	NI	=	=
C/TCUL-1	Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	LTS/LTS	NI	=	=
C/TCUL-2	Implementation of the project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	PS/LTS	NI	=	=
C/TCUL-3	Implementation of the project could potentially cause a significant impact due to disturbance of human remains, including those interred outside of formal cemeteries.	PS/LTS	NI	=	=
C/TCUL-4	Implementation of the project could cause a substantial adverse change in the significance of a tribal cultural resource.	PS/LTS	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
GEO-1	The proposed project could potentially directly or indirectly result in substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, or seismic-related ground failure including liquefaction and landslides.	PS/LTS	NI	=	=
GEO-2	The proposed project could result in substantial soil erosion or loss of topsoil.	PS/LTS	NI	=	=
GEO-3	The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	PS/LTS	NI	=	=
GEO-4	The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	PS/LTS	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
GEO-5	The proposed project will not be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water.	NI/NI	NI	=	=
GEO-6	The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	PS/LTS	NI	=	=
GHG-1	Implementation of the proposed Pacifica School District Workforce Housing project would not generate greenhouse gas emissions, either directly or indirectly, that would result in a significant impact on the environment.	PS/LTS	NI	+	=
GHG-2	Implementation of the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTS/LTS	NI	=	=
HAZ-1	The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS/LTS	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
HAZ-2	The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	PS/LTS	NI	=	=
HAZ-3	The proposed project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS/LTS	NI	=	=
HAZ-4	The proposed project would not be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	NI/NI	NI	=	=
HAZ-5	The proposed project would be located within an airport land use plan, but would not result in a safety hazard or excessive noise for people residing or working in the project area.	LTS/LTS	NI	=	=
HAZ-6	The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS/LTS	NI	=	=



PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
HAZ-7	The proposed project could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	LTS/LTS	NI	=	=
HYDRO-1	Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	LTS/LTS	NI	+	=
HYDRO-2	Implementation of the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin.	LTS/LTS	NI	+	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
HYDRO-3	Implementation of the proposed would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows.	LTS/LTS	NI	+	=
HYDRO-4	Implementation of the proposed project would not result in the risk of release of pollutants due to project inundation as a result of being located in a flood hazard, tsunami, or seiche zone.	LTS/LTS	NI	+	=
HYDRO-5	Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTS/LTS	NI	+	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
LUP-1	The project would not physically divide an established community.	LTS/LTS	NI	=	=
LUP-2	The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.	LTS/LTS	NI	=	=
NOI-1	The proposed project could involve generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	PS/LTS	NI	=	=
NOI-2	The proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels.	LTS/LTS	NI	=	=
NOI-3	The proposed project, would not expose people residing or working in the project area to excessive noise levels as a result of being located in an airport land use plan.	NI/NI	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
POP-1	The project would not induce direct substantial population growth in the area as a result of construction of the proposed units, nor would the project result in indirect population growth in the area as a result of expansion of public facilities, such as roads or other infrastructure.	LTS/LTS	NI	=	=
POP-2	The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	LTS/LTS	NI	=	=
PS-1	The project would not require expansion or construction of new governmental facilities which could result in substantial adverse physical impacts as a result of increased demand for fire protection, police protection, schools, parks, or other public facilities.	LTS/LTS	NI	=	=
TRA-1	The project will not conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities.	LTS/LTS	NI	=	=
TRA-2	The project will conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (B).	S/SU	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
TRA-3	The project will not substantially increase hazards due to a geometric design or incompatible uses.	PS/LTS	NI	=	=
TRA-4	Implementation of the project will not result in inadequate emergency access.	LTS/LTS	NI	=	=
UTIL-1	Implementation of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LTS/LTS	NI	+	=
UTIL-2	Implementation of project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	LTS/LTS	NI	+	=
UTIL-3	Implementation of the project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS/LTS	NI	+	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
UTIL-4	Implementation of the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS/LTS	NI	+	=
UTIL-5	Implementation of the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	LTS/LTS	NI	+	=
FIRE-1	The project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	LTS/LTS	NI	=	=
FIRE-2	The project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	LTS/LTS	NI	=	=

PROJECT IMPACT		PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING PROJECT: PROPOSED PROJECT (BEFORE AND AFTER MITIGATION)	ALT 1: No Project/No Development	ALT 2: PARK PACIFICA HIGHLAND SUBDIVISION: 54 SINGLE FAMILY RESIDENCES	ALT 3: VARIATION OF SITE LAYOUT AND UNIT TYPES
FIRE-3	The project would not require installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	LTS/LTS	NI	=	=
FIRE-4	The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	LTS/LTS	NI	=	=

**Key:**

S	Significant
SU	Significant and unavoidable
PS	Potentially significant
LTS	Less than significant
NI	No impact
=	Impact similar to proposed project
-	Impact less than proposed project
+	Impact greater than proposed project





# 7.0 REFERENCES

## 7.1 SOURCES

The following sources were used in the preparation of this Draft Environmental Impact Report (DEIR). Each chapter/section lists the sources referenced at the end of the chapter/section.

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33. City of Pacifica, Climate Action Plan Implementation Report, October 2017
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## **7.2 PERSONS CONSULTED**

Patrick Kobernus, Principal Wildlife Biologist, Coast Ridge Ecology  
Gary Black, President, Hexagon Transportation Consultants, Inc.

## 7.3 REPORT PREPARERS

### **M-Group:**

Olivia Ervin, Principal

Krystle Rizzi, Project Manager and Senior Planner

Ranu Aggarwal, AICP, Principal Planner

Justin Shiu, Senior Planner

Eric Roberts, Associate Planner

Alaina Lipp, Associate Planner