

# PACIFICA SCHOOL DISTRICT WORKFORCE HOUSING FINAL ENVIRONMENTAL IMPACT REPORT

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**PREPARED BY M-GROUP FOR:**

THE CITY OF PACIFICA PLANNING DEPARTMENT  
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**IN ASSOCIATION WITH:**

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# 1.0 INTRODUCTION

## 1.1 OVERVIEW

In accordance with the California Environmental Quality Act (CEQA) Sections 15088, 15089, and 15132 of CEQA, the City of Pacifica has prepared the Final Environmental Impact Report (FEIR) for the Pacifica School District Workforce Housing project. Pursuant to CEQA requirements, the City of Pacifica must certify the FEIR as complete and adequate prior to approval of the proposed project.

Per CEQA Guidelines Section 15121(a) and 15362, an Environmental Impact Report (EIR) is an informational document meant to inform public agencies, decision makers, and members of the public by disclosing potential significant impacts likely to result from a project and identify methods to avoid or otherwise mitigate those impacts. An EIR must also consider a reasonable range of alternatives to a proposed project to avoid or minimize impacts while still feasibly accomplishing the stated project objectives.

Per CEQA Guidelines Section 15132, the FEIR shall be comprised of the following:

- a. The Draft EIR or revisions of the Draft.
- b. Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- c. A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e. Any other information added by the Lead Agency.

Regarding 15132(a), none of the comments received on the DEIR during the public review period necessitate revisions or clarifications and as such, the DEIR as published on November 23, 2022 for public review is incorporated herein by reference without revisions.

Pursuant to CEQA Guidelines Section 15151 the adequacy of an EIR is measured based on the extent to which the analysis provides decision makers with enough information to consider environmental consequences and make an informed decision. In general, courts have held that an EIR should not be held to a standard of perfection, but rather, should exhibit a good faith effort at full disclosure, and should be adequate and complete.

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## 1.2 PUBLIC PARTICIPATION

The environmental review process for the Pacifica School District Workforce Housing project commenced with circulation of the Notice of Preparation (NOP) for a thirty-day period from October 22, 2021, to November 22, 2021. A public scoping meeting was held on November 4, 2021. Subsequently, on November 23, 2022, the City of Pacifica released a Notice of Availability (NOA) for the DEIR. The NOA announced a thirty-day comment period on the DEIR extending from November 23, 2022 until January 9, 2023. The Public Comment period provided an opportunity for interested parties to provide input regarding the adequacy of the environmental document. The City received one public comment during the public review period, as further described in Section 2.0.

No substantial revisions that would merit recirculation of the DEIR as defined by CEQA Guidelines Section 15088.5(b) were made to the project or analyses after public comment. All comments received from the public, interested parties and decision makers on the DEIR are identified herein (Chapter 2). Chapter 4 provides a summary of comments received and responses to address comments.

## 1.3 FEIR PROCESS + FINDINGS

This FEIR includes written responses to environmental issues raised in comments received during the public review period in accordance with CEQA Guidelines Section 15088. The FEIR will be presented to the Planning Commission and City Council for consideration. Prior to the City Council acting on the proposed project, the decision makers must certify that the information presented in the EIR has been reviewed and considered, that the EIR has been completed in a manner that conforms with the requirements of CEQA, and that the City's independent judgment pursuant to CEQA Guidelines Section 15090 is adequately reflected.

In accordance with Section 21002, 21002.1 and 21081 of the Public Resources Code and CEQA Guidelines Sections 15091 and 15093, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects unless one or more of the following findings are made:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the FEIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted

by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.

When a lead agency approves a project that will result in the occurrence of significant effects that cannot be avoided or substantially lessened, the agency shall state reasons to support the action in a “statement of overriding considerations” that is supported by substantial evidence in the record.

## 1.4 ORGANIZATION OF THE FEIR

The Final EIR document is organized as follows:

**Chapter 1, Introduction** provides an overview of the CEQA process, public participation process, and organization of the FEIR.

**Chapter 2, Comments on the Draft EIR** provides a list of all comments received during the public review and comment period and responses to comments.

**Chapter 3, Mitigation Monitoring and Reporting Program** describes the identified mitigation measure, method of verification, timing of verification, responsible party, and completion of implementation of mitigation measures.

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## 2.0 COMMENTS ON THE DEIR

### 2.1 AGENCY AND INDIVIDUAL COMMENTS

During the more than forty five-day comment period on the DEIR extending from November 23, 2022 to January 9, 2023, the City of Pacifica received a one written comment. The agencies, organizations, and individuals who provided comments are listed below.

| <b>LETTER/PUBLIC COMMENT</b> | <b>AGENCY/INDIVIDUAL</b>      | <b>DATE RECEIVED</b> |
|------------------------------|-------------------------------|----------------------|
| Letter Comment 1             | Peter Tang, Pacifica Resident | 12/22/2022           |

### 2.2 COMMENTS ON THE DEIR AND RESPONSES TO COMMENTS

This section of the FEIR includes copies of comments received by hand-delivered or electronic mail during the public review and comment period on the DEIR. Specific responses to individual comments follow the letter. The comment letter is cataloged using the sender's first and last initial followed by a numeric designator for each individual comment (e.g. AB-1) with the corresponding response provided below.

Responses focus on comments that pertain to the adequacy of the analysis in the DEIR or to other aspects pertinent to the potential impacts of the project on the environment pursuant to CEQA. Comments that address topics beyond the purview of this EIR or CEQA, such as comments on the merits of the project, are noted as such for the public record and will be considered by the City prior to making a decision on the project, however, no response is provided in the FEIR as they do not relate specifically to environmental effects.



December 16, 2022

Christian Murdock  
Director of Planning  
540 Crespi Drive  
Pacifica, CA 94044

RECEIVED

DEC 22 2022

City of Pacifica

Dear Mr. Murdock,

Hello, my name is Peter and I am a student at Sacred Heart Cathedral Preparatory as well as a resident in Pacifica.

In recent years, due to budget cuts and high living costs, schools have had difficulty in retaining teachers. With this retainage issue, the city of Pacifica came up with a proposal to solve this issue. A couple of years ago, the city of Pacifica held a council meeting in which there were talks about the School workforce housing project being developed, its purpose being to provide housing for teachers, which they believe would be able to help retain teachers as well as attract new ones, though I'm pretty sure you already know this.

PT-1

I have heard stories from my mom about her co-workers son, who goes to Ortega Elementary School, having classes with two different grades packed into them because there aren't enough teachers to teach all the kids in the school. This is likely due to the housing in Pacifica, with the average house price being close to a million dollars, as well as the long commute time and traffic going in and out of the city. While this is a great idea for a short term, in the long term, at least to me, won't really work out for the community.

PT-2

While it's true that we are in desperate need of gaining and retaining new teachers, there is also the possibility that the teachers themselves may not want to live in a small area. In an article published by Education Weekly, despite liking living so close to their job, there were some who felt like they couldn't settle down into the community. This could be especially true for those who are too used to city life and if enough people aren't living in these housings, the whole project could end up being a waste.

PT-3

In the instance where if the project is successful, we would have to deal with the changes in traffic around the area, especially Oddstad. Since the streets are only two lanes and very narrow, this could result in a large increase in traffic because of the amount of people leaving the compound, as well as the number of people using that street as a means to commute to work outside of the city. With this increase in the volume of cars, there would be a more likely chance that there will be accidents or someone will get hit.

PT-4

In addition, you would also have to worry about the management and upkeep of the place, and we do not know where that'll be coming from. Would we raise taxes on residents? Would we have to draw from other budgets such as for education?

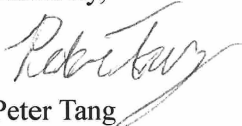
**PT-5**

While it's not really my place to say this, I believe that there can be solutions that may be cheaper. One solution could be an increase in pay or added benefits for teachers. This would probably gain the attraction of more qualified people who think that "hey, this school pays a lot more and has much more benefits than the one I'm currently working at." Another solution could be providing vouchers for teachers instead of building new structures altogether without worrying if teachers would live there or not.

**PT-6**

I'm sure that you have heard or listened to some concerns like these by more respectable people., but I've just written this letter just to share my thoughts with you. Thank you for taking your time to read this letter. and I hope you have a great day.

Sincerely,



Peter Tang



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## 2.3 RESPONSE TO PETER TANG COMMENT LETTER

### 2.3.1 RESPONSE PT-1

The comment is acknowledged. This comment is related to the merits of the project and does not address the adequacy of the EIR. No further response is required.

### 2.3.2 RESPONSE PT-2

The comment is acknowledged. This comment is related to the merits of the project and does not address the adequacy of the EIR. No further response is required.

### 2.3.3 RESPONSE PT-3

Development of the project provides opportunities to house faculty and staff of the Pacifica School District to allow those seeking housing opportunities and shorter commutes to live and work locally. Providing affordable housing options within the City of Pacifica will also result in a reduction of vehicle miles traveled for those who would otherwise commute from other cities, which is in line with State goals to reduce VMT and greenhouse gas emissions.

As provided in the City's Housing Element, there is an ongoing need to provide housing at all income levels to meet the City's regional housing needs allocation (RHNA). As described in Chapter 4.11, page 4.11-4 of the DEIR, the development of housing in the city from 2014-2022 (126 units) was short of the RHNA target (413). With an unmet need of 287 units, there remains an ongoing need for housing at all income levels, especially affordable housing, in the community. Moreover, 253 units of the unmet need (259 unit target compared to 6 units produced) were at income levels of moderate income or below, which are typical income levels for faculty and school staff. Development of the project is within the projected buildout under the General Plan, and is consistent with policies contained in the Housing Element that seek to prioritize in-fill residential development, provide housing opportunities for all income groups, and provide a choice of housing types and densities.

Additionally, housing proposed by the project can be made available to those not employed by the school district should the demand by district employees be lower than the supply of units. As described in Chapter 4.11, page 4.11-5 of the DEIR, 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. If not all of 45 units are occupied by faculty and staff of the Pacifica School District, units may be made available to faculty and staff of nearby school districts, community college districts, or other public

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employees in the City of Pacifica and surrounding communities. Not more than 25 units in the project will 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.

#### 2.3.4 RESPONSE PT-4

As described in Chapter 4.13 of the DEIR, Oddstad Boulevard has a maximum capacity of 12,000 vehicles per day and is expected to operate substantially below capacity with the addition of project traffic. Oddstad Boulevard is an existing two-lane residential collector street serving the city's southeast residential areas, including the project site which is located in a single-family residential area that does not contain high traffic-generating land uses. The project is estimated to generate 484 average daily trips, including 30 during the AM peak hour and 37 during the PM peak hour.

The increase in traffic on the roadway represents less than five percent of the total roadway capacity. Furthermore, the traffic analysis prepared for the project concluded that under existing, existing plus project, background, and background plus project conditions, study intersections will 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 project generated traffic. Additionally, the project is located in an area supporting alternatives to automobile travel including bicycle, pedestrian, and transit facilities and as such would not introduce a conflict between multiple travel modes that could result in unsafe conditions.

Furthermore, the project will not obstruct sight distance at the driveways and the DEIR includes Mitigation Measure TRA-4 which requires 30 feet of red curb be painted to the left of the driveway along Oddstad Boulevard to ensure on-street parking does not obstruct sight lines at the project driveway. Therefore, the project will not introduce a design feature that creates hazardous conditions.

#### 2.3.5 RESPONSE PT-5

The comment is acknowledged. This comment is related to the merits of the project and does not address the adequacy of the EIR. No further response is required.

#### 2.3.6 RESPONSE PT-6

The comment is acknowledged. This comment is related to the merits of the project and does not address the adequacy of the EIR. No further response is required.

# 3.0 MITIGATION MONITORING AND REPORTING PROGRAM

| MITIGATION MEASURES  |  | METHOD OF VERIFICATION                                   | TIMING OF VERIFICATION  | RESPONSIBLE PARTY               | COMPLETION (DATE/INITIAL) |
|--|--|--|---|---------------------------------|---------------------------|
| <b>AESTHETICS</b>  |  |  |   |                                 |                           |
| <p><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.</p> |  | Review and Approval by Planning Department.              | Prior to Issuance of Demolition, Grading, or Building Permit. | Applicant, Planning Department. |                           |
| <b>AIR QUALITY</b>   |  |  |   |                                 |                           |
| <p><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:</p> <ol style="list-style-type: none"> <li>All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li> <li>All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per</li> </ol>   |  | Review and Approval by Planning and Building Department. | Prior to Issuance of Demolition, Grading, or Building Permit. | Applicant, Planning Department. |                           |

| MITIGATION MEASURES   | METHOD OF VERIFICATION  | TIMING OF VERIFICATION                                    | RESPONSIBLE PARTY                      | COMPLETION (DATE/INITIAL) |
|---|---|---|--|---------------------------|
| <p>day. The use of dry power sweeping is prohibited.</p> <p>4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> |   |   |  |                           |
| <p><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> <p>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:</p> <p>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</p>   | <p>Review and Approval by Planning and Building Department.</p> | <p>Prior to Issuance of Demolition or Grading Permit.</p> | <p>Applicant, Planning Department.</p> |                           |

| MITIGATION MEASURES  | METHOD OF VERIFICATION                                       | TIMING OF VERIFICATION                                   | RESPONSIBLE PARTY                      | COMPLETION (DATE/INITIAL) |
|--|--|--|--|---------------------------|
| <p>devices that altogether achieve a 60 percent or greater reduction in particulate matter exhaust in comparison to uncontrolled equipment.</p> <p>b. Alternatively fueled or electric equipment.</p> <p>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:</p> <ul style="list-style-type: none"> <li>a. Use Tier 4 or alternatively fueled equipment;</li> <li>b. Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors;</li> <li>c. Use of electric-powered equipment;</li> <li>d. Use of electric or propane/natural gas-powered forklifts and aerial lifts;</li> <li>e. Change in construction build-out plans to lengthen phases;</li> <li>f. Implementation of different building techniques that result in less diesel equipment usage.</li> </ul> |  |  |  |                           |
| <b>BIOLOGICAL RESOURCES</b>  |  |  |  |                           |
| <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>Survey by Biologist, Approval by Planning Department.</p> | <p>Prior to Commencement of Construction Activities.</p> | <p>Applicant, Planning Department.</p> |                           |

| MITIGATION MEASURES   | METHOD OF VERIFICATION   | TIMING OF VERIFICATION                                    | RESPONSIBLE PARTY  | COMPLETION (DATE/INITIAL) |
|---|--|---|--|---------------------------|
| <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 construction crews by hand and under the direct supervision of a qualified biologist.</li> <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>Plan by Biologist, Review and Approval by Planning Department and CDFW.</p> | <p>Prior to Issuance of Demolition or Grading Permit.</p> | <p>Applicant, California Department of Fish and Wildlife, Planning Department.</p> |                           |
| <p><b>BIO-3:</b> To offset the loss or disturbance of foraging habitat (native forbs and shrubs) for the special-status obscure bumble bee (<i>Bombus</i></p>   | <p>Review and Approval by</p>  | <p>Prior to Issuance of</p>                               | <p>Applicant, Planning</p>   |                           |

| MITIGATION MEASURES  | METHOD OF VERIFICATION                                       | TIMING OF VERIFICATION  | RESPONSIBLE PARTY                      | COMPLETION (DATE/INITIAL) |
|--|--|---|--|---------------------------|
| <p>caliginosus), 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 Acmispon, gumplant (<i>Grindelia</i> spp.), and <i>Phacelia</i> 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>Planning Department.<br/>CDFW</p>                         | <p>Building Permit.</p>   | <p>Department.</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.<br/><br/>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>Survey by Biologist, Approval by Planning Department.</p> | <p>No More than 5 Days Prior to Commencement of Ground Disturbing Activities.</p>                               | <p>Applicant, Planning Department.</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 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</p> | <p>Survey by Biologist, Approval by Planning Department.</p> | <p>No More than 15 Days Prior to Demolition, Tree Removal, or Commencement of Ground Disturbing Activities.</p> | <p>Applicant, Planning Department.</p> |                           |

| MITIGATION MEASURES   | METHOD OF VERIFICATION  | TIMING OF VERIFICATION   | RESPONSIBLE PARTY  | COMPLETION (DATE/INITIAL) |
|---|---|--|--|---------------------------|
| <p>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 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.</p> | <p>Survey by Biologist, Approval by Planning Department.</p>              | <p>No More than 14 Days Prior to Ground Disturbing Activities.</p> | <p>Applicant, Planning Department.</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>Inspection by Biological Monitor, Approval by Planning Department.</p> | <p>Prior to Issuance of Demolition or Grading Permit.</p>          | <p>Applicant, Construction Manager, Planning Department.</p> |                           |



| MITIGATION MEASURES   | METHOD OF VERIFICATION                             | TIMING OF VERIFICATION  | RESPONSIBLE PARTY   | COMPLETION (DATE/INITIAL) |
|---|--|---|---|---------------------------|
| <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 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>Review and Approval by Planning Department.</p> | <p>Prior to Final Inspection.</p>                             | <p>Applicant, Planning Department.</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>   | <p>Review and Approval by Planning Department.</p> | <p>Prior to Issuance of Building Permit.</p>                  | <p>Applicant, Planning Department.</p>                    |                           |
| <b>CULTURAL AND TRIBAL CULTURAL RESOURCES</b>   |  |   |   |                           |
| <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</p>   | <p>Training Conducted by Archaeologist.</p>        | <p>Prior to Commencement of Ground Disturbing Activities.</p> | <p>Applicant, Construction Team, Planning Department.</p> |                           |

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| <p>procedures to follow 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 submitted to the project applicant and the Northwest Information Center.</p> | <p>Construction Team with Cultural Awareness Training. Observation by Native American Monitor. Evaluation by Archaeologist. Planning Department Required to be Notified of Any Discovery.</p> | <p>During Ground Disturbing Activities.</p> | <p>Applicant, Construction Team, Planning Department.</p> |                           |
| <p><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</p>  | <p>Construction Team with Cultural Awareness</p>  | <p>During Ground Disturbing Activities.</p> | <p>Applicant, Construction Team, Planning</p>             |                           |

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| <p>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.</p> | <p>Training.<br/>Archaeologist evaluation.<br/>Planning Department<br/>Required to be Notified of Any Discovery.</p> |  | <p>Department.</p>  |                           |
| <p><b>GEOLOGY AND SOILS</b></p>  |  |  |   |                           |
| <p><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.</p>  | <p>Review and Approval by Public Works and Building Department.</p>  | <p>Prior to Grading and Building Permit Issuance.</p>    | <p>Applicant, Public Works Department, Planning Department.</p> |                           |
| <p><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</p>   | <p>Review and Approval by Public Works Department.</p>   | <p>Prior to Demolition, Grading, and Building Permit</p> | <p>Applicant, Public Works Department.</p>                      |                           |

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| <p>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.</p>   |   | <p>Issuance.</p>                                       |   |                           |
| <p><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.</p>  | <p>Review and Coordination between Applicant and Planning Department.</p> | <p>During Ground Disturbing Activities</p>             | <p>Applicant, Construction Team, Planning Department.</p> |                           |
| <p><b>GREENHOUSE GAS EMISSIONS</b></p>   |   |  |   |                           |
| <p><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 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 reductions.</p>  | <p>Review and Approval by Planning and Building Departments.</p>          | <p>Prior to Demolition or Grading Permit Issuance.</p> | <p>Applicant, Planning Department.</p>                    |                           |
| <p><b>HAZARDS AND HAZARDOUS MATERIALS</b></p>  |   |  |   |                           |
| <p><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,</p> | <p>Survey by Asbestos Inspector. Review by Building Department.</p>       | <p>Prior to Demolition Permit Issuance</p>             | <p>Applicant, Planning Department.</p>                    |                           |

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| <p>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.</p>   |  |   |   |                           |
| <p><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:</p> <ol style="list-style-type: none"> <li>1. Remove all vegetation within the site listed on the San Mateo County list of "Fire Prone (Pyrophytic) Plants" except for isolated specimen plants.               <ol style="list-style-type: none"> <li>a. Existing isolated or newly planted specimens shall meet the vertical and horizontal spacing guidelines.</li> </ol> </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> | <p>Review and Approval by Planning Department and North County Fire Authority.</p> | <p>Prior to Building Permit Issuance.</p> | <p>Applicant, Planning Department, North County Fire Authority.</p> |                           |
| <p><b>NOISE</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.</li> </ul>  | <p>Review and Approval by Planning Department.</p>                                 | <p>During Construction.</p>               | <p>Applicant, Construction Team, Planning</p>                       |                           |

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| <p>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 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.</li> <li>• 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, 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</li> </ul> |                        |                        | Department.       |                           |

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| <p>construction site.</p>  |  |   |  |                           |
| <p><b>TRANSPORTATION AND TRAFFIC</b></p> <p><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:</p> <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> | <p>Review and Approval by Planning Department.</p> | <p>Prior to Building Permit Issuance.</p> | <p>Applicant, Planning Department.</p> |                           |
| <p><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.</p>   | <p>Review and Approval by Planning Department.</p> | <p>Prior to Building Permit Issuance.</p> | <p>Applicant, Planning Department.</p> |                           |

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| <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>Review and Approval by Planning Department.</p>                     | <p>Prior to Final Inspection.</p>  | <p>Applicant, Planning Department.</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>  | <p>Review and Approval by Planning Department and Fire Department.</p> | <p>Prior to Building Permit Issuance, and Prior to Final Inspection.</p> | <p>Applicant, Planning Department, Fire Department.</p> |                           |