RESOLUTION NO. 52-2024

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PACIFICA CERTIFYING A FINAL ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE 310-330 ESPLANADE AVENUE INFRASTRUCTURE PRESERVATION PROJECT LOCATED ALONG THE WEST SIDE OF ESPLANADE AVENUE, BETWEEN MANOR DRIVE ON THE SOUTH AND WEST BEAUMONT BOULEVARD ON THE NORTH; APPROVE THE PROJECT AS DEFINED AND ANALYZED IN THE EIR AND PROCEED THEREWITH BY APPLYING TO THE CALIFORNIA COASTAL COMMISSION FOR PERMITS/APPROVALS; ADOPT THE FINDINGS AND MITIGATION MONITORING REPORT (MMRP); AND DIRECT CITY STAFF TO FILE THE NOTICE OF DETERMINATION

Initiated by: City of Pacifica Public Works ("Applicant")

WHEREAS, the City of Pacifica Public Works ("Applicant") has identified a need to construct a shoreline protection structure along the west side of Esplanade Avenue, between Manor Drive on the south and West Beaumont Boulevard on the north, to fortify the eroding bluff. The proposed Project extends from Esplanade Avenue westward to the shoreline of the Pacific Ocean, including the entirety of the properties located at 310, 320, 330, and portions of 100, 340 and 360 Esplanade Avenue. The proposed project includes several structural elements to fortify the bluff including a sheet pile wall below the low sand levels, a cap beam on top of the sheet pile wall also below the low sand level, and a shotcrete (sprayed concrete) wall secured to the bluff face with tensioned tieback rods/tendons drilled into the bluff face above the low sand level, as well as removal of existing riprap, blufftop restoration, and bluff monitoring ("Project"); and

WHEREAS, the City determined that the Project required the preparation of an EIR, pursuant to the requirements of the California Environmental Quality Act (Public Resources Code Section 21000 *et seq.*; "CEQA"), and the Guidelines for Implementation of the California Environmental Quality Act (Title 14, Sections 15000 *et seq.* of the California Code of Regulations; "CEQA Guidelines"); and

WHEREAS, the City prepared a Draft EIR dated September 2023 to consider, identify and analyze all potential environmental impacts of the proposed Project (State Clearinghouse No. 2022100372), which concluded that the Project could result in potentially significant impacts to Aesthetics, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Land Use, Noise, and Public Services and Recreation, and that all the potentially significant impacts of the Project, can be avoided or reduced to insignificance with implementation of mitigation measures; and

WHEREAS, the City provided notice of the availability of the Draft EIR and the City made the Draft EIR available for a 45-day review and comment period that ran from October 4, 2023, to November 20, 2023; and

WHEREAS, the City received two written public comment and five agency comment letters during the Draft EIR public review period; and

WHEREAS, the City prepared written responses to the comment letters received during the comment period, which together with revisions to the Draft EIR and the Mitigation and Monitoring Report ("MMRP") and Findings of Fact, constitute the Final EIR; and

WHEREAS, no significant new information has been added to the EIR after public notice of the availability of the Draft EIR or added or modified in the Final EIR, under CEQA Guidelines section 15088.5. The additional information and modifications that have been provided do not show (1) a new significant environmental impact, (2) a substantial increase in the severity of an environmental impact, (3) that a feasible project alternative or mitigation measure would clearly lessen the significant impacts of the Project, but that the developer declines to adopt it, or (4) that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comments are precluded. The EIR mitigation measures are incorporated in the Final EIR for the Project to avoid or substantially lessen significant environmental effects. Therefore, no further analysis is required and there is no need to recirculate a revised EIR for further review and comment; and

WHEREAS, the City provided notice of the City Council's intent to hold a public hearing to consider the Final EIR and MMRP and approval of the Project, as required by law by publishing a Notice of Public Hearing in the San Mateo Daily Journal on May 31, 2024, and by mailing the Notice of Public Hearing to 257 surrounding property owners, occupants and interested parties on May 30, 2024; and

WHEREAS, the Final EIR identified certain significant and potentially significant adverse effects on the environment what would result from implementing the project; and

WHEREAS, the Final EIR outlined various mitigation measures that would substantially lessen or avoid many of the project's significant effects on the environment, as well as alternatives to the project as proposed that would provide some environmental advantages; and

WHEREAS, the City is required to adopt all feasible mitigation measures or feasible project alternatives that can substantially lessen or avoid any significant environmental effects of the project; and

WHEREAS, the Final EIR analyzed the project alternatives, including a No Project Alternative (#1), Grading of the Bluff (#2), Sand Replenishment (#3) and Rock Revetment (#4) and all of the alternatives would not sufficiently satisfy the project objectives; and

WHEREAS, pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, a lead agency, before approving a project for which an EIR has been prepared and certified, must adopt findings specifying whether mitigation measures and, in some instances, alternatives discussed in the EIR, have been adopted or rejected as infeasible; and

WHEREAS, a set of Findings of Fact are attached to this Resolution in order to satisfy Public Resources Code §21081 and CEQA Guidelines §15091; and

WHEREAS, the City Council has read and considered the Final EIR and MMRP prior to making its decision to approve; and

WHEREAS, the City Council held a duly noticed public hearing on June 10, 2024, at which time it considered all oral and documentary evidence presented, and incorporated all testimony and documents into the record by reference.

NOW, THEREFORE BE IT RESOLVED that the City Council of the City of Pacifica finds as follows:

1. The above recitals are true and correct and material to this Resolution.

2. In making its findings herein, the City Council relied upon and hereby incorporates by reference all correspondence, oral and written staff reports, public comments and other related materials.

BE IT FURTHER RESOLVED that the City Council of the City of Pacifica does hereby take the following actions with respect to the Final EIR:

1. Pursuant to CEQA section 21081.6 and CEQA Guidelines section 15091, the City Council finds that the Final EIR for the Project was presented to the City Council, that the Final EIR was prepared, published, circulated, reviewed and completed in full compliance with State law and CEQA Guidelines, that there was adequate public review of the Draft EIR, that it has considered all comments on the Draft EIR and responses to comments, that the Final EIR adequately discusses all significant environmental issues, and that the Final EIR reflects the independent judgment and analysis of the City Council. The City Council further certifies that it has reviewed and considered the information in the Final EIR.

2. The City Council finds that the information added in the Final EIR does not constitute significant new information requiring recirculation, but rather that additional information clarifies or amplifies an adequate EIR.

3. The City Council hereby certifies the Final EIR for the Project which was presented to the Council at the public meeting on June 10, 2024 and can be found at https://www.cityofpacifica.org/departments/planning/environmental-documents.

4. The City Council approves the Project as defined and analyzed in the Final EIR and directs staff to proceed with applying to the California Coastal Commission for approval of the underlying Project.

5. Pursuant to CEQA Section 21081.6 and CEQA Guidelines section 15091, the City Council has reviewed and considered the Mitigation Monitoring and Reporting Program (MMRP) that requires all mitigation measures described in the Final EIR be implemented by means of Project conditions, agreements or other measures, as set forth in the MMRP, attached hereto as Exhibit A and incorporated herein by reference. The City Council hereby adopts the MMRP.

6. The City Council has reviewed and considered the CEQA Findings attached hereto for the Project attached hereto and incorporated by reference and finds that such Findings are supported by substantial evidence and adopts the findings of fact.

7. Pursuant to CEQA Guidelines section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City Council has based its determination. The record of proceedings is available for review by responsible agencies and interested members of the public during normal business hours at the Planning Department, 540 Crespi Drive, Pacifica, CA 94044. The custodian of these documents is the Planning Department of the City of Pacifica.

8. The City Council directs Planning Staff to file a Notice of Determination with the

San Mateo County Clerk and the Office of Planning and Research.

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PASSED AND ADOPTED at a regular meeting of the City Council of the City of Pacifica, California, held on the 10th day of June, 2024, by the following vote:

AYES, Councilmembers: Beckmeyer, Bier, Bigstyck, Vaterlaus.

NOES, Councilmembers: n/a

ABSENT, Councilmembers: n/a

ABSTAIN, Councilmembers: Boles.

Sue Vaterlaus, Mayor

ATTEST:

Sarah Coffey, City Clerk

APPROVED AS TO FORM:

Michelle Kenyon, City Attorney

EXHIBIT A

Mitigation Monitoring and Reporting Program (MMRP)

EXHIBIT A

MITIGATION MONITORING AND REPORTING PROGRAM

CEQA Statute Section 21081.6 and State CEQA Guidelines Section 15097 require a public agency to adopt a reporting or monitoring program (MMRP) to ensure compliance with the mitigation measures adopted by the agency at the time of project approval. A mitigation monitoring program would therefore be required for the San Carlos Focused General Plan Update EIR to ensure compliance with the mitigation measures that are adopted and incorporated into the project. Adoption of the MMRP would occur at the time of project approval.

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to the CEQA Guidelines, which state:

> "When adopting a final EIR with findings as required under 14 CCR section 15091(a)(1) the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects" (§15097(a)); and
>
> "The Lead Agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision-making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. "Monitoring" is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both." (§15097(c))

The table beginning on the next page lists the impacts, mitigation measures, and timing of the mitigation measure (when the measure will be implemented) related to the Project. The "Impact" column lists each significant impact, by resource topic, that is identified in the EIR and for which mitigation measures are recommended. The "Mitigation Measure" column provides the full text of each mitigation measure identified in the EIR. The "Monitoring" column describes (1) the "implementation entity" responsible for carrying out each mitigation measure (such a "project applicant" or "City of Pacifica Planning Department"); (2) mitigation implementation timing requirements (e.g., at the completion of a particular future individual project development review or construction phase, prior to occupancy, or when some other specific threshold is reached); and (3) the entity responsible for performing the monitoring of each mitigation measure (the "monitoring and verification entity;" e.g., a City department or agency, another public agency, or some other entity).

According to CEQA Guidelines Section 15126.4(a)(2), "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design." Therefore, all mitigation measures as listed in this MMRP will be adopted by the City of Pacifica when the project is approved.

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
Air Quality						
Impact AIR-3: The Project could expose sensitive receptors to substantial pollutant concentrations and associated adverse health risks. **(Less than Significant with Mitigation Incorporated).**	**Mitigation Measure AIR-3:** To reduce potential, short-term adverse health risks associated with $PM_{2.5}$ exhaust emissions, including emissions of DPM generated during Project construction activities, the City shall require its designated contractors, contractor's representatives, and/or other appropriate personnel to comply with the following construction equipment restrictions. All mobile construction equipment greater than 50 horsepower in size shall meet with U.S. EPA and CARB Tier IV interim exhaust emission standards. This may be achieved via the use of equipment with engines that have been certified to meet U.S. EPA and CARB Tier IV interim emissions standards, or through the use of equipment that has been retrofitted with a CARB-verified diesel emission control strategy (e.g., particulate filter) capable of reducing exhaust $PM_{2.5}$ emissions to levels that meet U.S. EPA and CARB Tier IV interim emissions standards. As an alternative to having all mobile construction equipment greater than 50 horsepower meet with U.S. EPA and CARB Tier IV interim exhaust emission standards, the City may prepare a refined construction health risk assessment once additional Project-specific construction information is known (e.g., specific construction equipment type, quantity, engine tier, and runtime by phase). The refined health risk assessment shall demonstrate and identify any measures necessary such that the proposed Project's incremental carcinogenic health risk at nearby	City of Pacifica Public Works Department	City of Pacifica Planning Department	Prior to the start of and during construction activities.		

	sensitive receptor locations is below the applicable BAAQMD threshold of 10 cancers in a million.					
Biological Resources						
Impact BIO-1: The Project could have a significant adverse effect, either directly or through habitat modifications, on special-status fish (steelhead, Coho salmon, and green sturgeon), Essential Fish Habitat (EFH), and American peregrine falcon, bank swallow, and other nesting birds. Implementation of Mitigation Measures BIO-1a, 1b, 1c, 1d, and 1e would reduce potential impacts to a less than significant level. **(Less than Significant with Mitigation Incorporated)**	**Mitigation Measure BIO-1a: Best Management Practices (BMPs) to Protect Water Quality, Special-Status Fish, and EFH** The project shall minimize to the greatest extent feasible all construction in tidal / open water habitat areas. During all construction in and near tidal aquatic habitat, standard BMPs shall be used to minimize erosion and impacts to water quality as well as direct impacts to special-status fish and EFH. The following BMPs shall be included in the Project to minimize erosion, impacts to water quality, and impacts to special-status species (also see BMPs in Chapter 3.3.9, of the Project Description): • The contractor shall monitor the tides and coordinate work to avoid construction activities in open water habitat. The timing and elevation of tides can be monitored by checking the San Francisco NOAA tidal station (#9414290) found online at https://tidesandcurrents.noaa.gov/noaatidepredictions.html?id=9414290. Because the Project area is approximately 16 miles south of the tidal station, the actual timing and elevation of tides needs to be adjusted specifically for the Project area. • No vehicles or heavy equipment shall be operated in open water habitat. • Earthmoving and clearing activities shall be performed in dry weather only.	City of Pacifica Public Works Department	City of Pacifica Planning Department	BIO-1a: Prior to the start of construction and during construction activities.		

	• Spoils shall be removed promptly and stockpiling of fill materials shall be avoided when rain is forecast. Stockpiles shall only be placed in designated locations, including near the 500 Esplanade ramp and at the staging area at the 310-330 lots at least 20 feet from the bluff face. No stockpiles shall be located on the beach. Soil stockpiles and other materials shall be covered with a tarp or other waterproof material during rain events. • In the event of rain, all grading work is to cease immediately. • Implement an erosion control plan during the wet season (October 15 through April 15), including, at a minimum, the following: o During the rainy season, all paved areas will be kept clear of earth material and debris. o Inlet protection will be installed at open inlets to prevent sediment from entering the storm drain system. o Straw rolls will be placed at the toe of slopes, and along the down slope perimeter of the Project area. • Equipment staging and parking of vehicles shall occur on defined staging areas only. • The integrity and effectiveness of erosion control measures shall be inspected on a daily basis or as required under the approved SWPPP. Corrective actions and repairs shall be carried out immediately for ineffective BMPs. • Fueling, washing, and maintenance of					

	vehicles shall occur in the defined staging areas, away from open water habitat. Equipment shall be regularly maintained to avoid fluid leaks. Any leaks shall be captured in containers until equipment is moved to a repair location. Hazardous materials shall be stored only within the defined staging areas. Containment and cleanup plans shall be prepared and implemented for the immediate cleanup of fluid or hazardous materials spills. • Sediment-laden water shall not be allowed to enter the ocean. • All litter and construction debris shall be disposed of off-site in accordance with state and local regulations. All trash and debris within the work area shall be placed in containers with secure lids before the end of work each day to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish. If containers meeting these criteria are not available, all rubbish shall be removed from the study area on a daily basis. • Discharge of all potential pollutants, including solid wastes, paints, concrete, petroleum products, chemicals, wash water or sediment and non-stormwater discharges to storm drains and water courses shall be controlled and prevented. • A hazardous spill plan shall be developed prior to construction. The plan shall describe what actions shall be taken in the event of a spill. The plan shall also incorporate preventative measures to be implemented, such as vehicle and equipment staging, cleaning, maintenance, and refueling; and contaminant (including fuel)					

	management and storage. In the event of a contaminant spill, work at the site shall immediately cease until the contractor has contained and mitigated the spill. The contractor shall immediately prevent further contamination and notify appropriate authorities and mitigate damage as appropriate. Adequate spill containment materials, such as oil diapers and hydrocarbon cleanup kits, shall be available on site at all times. Containers for storage, transportation, and disposal of contaminated absorbent materials shall be provided in the study area. • Trash and construction related solid wastes shall be deposited into a covered receptacle to prevent contamination and dispersal by wind. Trash and solid waste shall not be stored on the beach. • Work areas that are temporarily impacted shall be restored with respect to pre-existing contours and conditions, to the extent feasible, upon completion of work. Restoration work including revegetation and soil stabilization will be evaluated upon completion of work and performed, as needed. Construction materials and wastes shall be stored, handled, and disposed of properly, so as to prevent their contact with stormwater.					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	Mitigation Measure BIO-1b: Pre-Construction/Pre-Disturbance Surveys for Nesting Birds **Avoidance.** To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Mateo County extends from February 1 through September 15. **Pre-Construction Surveys.** If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during Project implementation. These surveys will be conducted no more than five days prior to the initiation of any site disturbance activities and equipment mobilization. If Project activities are delayed by more than five days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all potential nesting habitats (e.g., shrubs, ruderal areas, cliff terraces, etc.) in and immediately adjacent to the impact area and a 250-foot buffer around the area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are	City of Pacifica Public Works Department	City of Pacifica Planning Department	BIO-1b: Prior to the start of construction activities.		

	observed carrying food to the nest. The results of the surveys will be documented. If an active nest is found in the impact area or the 250 foot buffer, the biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 1000 feet for raptors and up to 250 feet for other species though this may sometimes be reduced in urban areas at the discretion of the biologist), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged. Monitoring will be required to ensure compliance with MBTA and relevant California Fish and Game Code requirements. Monitoring dates and findings will be documented**.** **Mitigation Measure BIO-1c: Bank Swallow Habitat Assessment** Prior to initiating Project activities, a qualified biologist shall conduct a bank swallow habitat assessment of the cliff bluffs within and near the Project footprint. The habitat assessment will at minimum address the cliff face attributes of 1) slope, 2) vegetation cover, 3) soil type (e.g., friable soils), and 4) cliff height. Based on these and any other relevant attributes, the habitat assessment will identify potentially suitable bank swallow habitat. A qualified biologist is an individual who holds a bachelor's degree	City of Pacifica Public Works Department	City of Pacifica Planning Department	BIO-1c: Prior to the start of construction activities.		

	from an accredited university and: 1) is knowledgeable in bank swallow and other relevant species' life histories and ecology, 2) can correctly identify relevant species, 3) has conducted field surveys for relevant species, 4) is familiar with relevant survey protocols, and 5) is knowledgeable of state and federal laws regarding the protection of sensitive species. If the habitat assessment described above identifies potentially suitable bank swallow habitat at or near the Project site, the qualified biologist shall identify whether the habitat can be avoided and if take of bank swallow could occur. If so, the qualified biologist shall prescribe avoidance, minimization and mitigation measures, in coordination with CDFW, as appropriate. An example of a measure could include restoration and enhancement of bank swallow habitat. **Mitigation Measure BIO-1d: Bank Swallow Incidental Take Permit** If the Project has the potential to cause take of bank swallow, the City shall apply for and obtain a CESA Incidental Take Permit. **Mitigation Measure BIO-1e: Invasive Species Best Management Practices** The following measures will be implemented to limit the spread of invasive species into native habitats: • All ground disturbing equipment used adjacent to native habitats will be washed (including wheels, tracks, and undercarriages) at a legally operating equipment yard both before and after	City of Pacifica Public Works Department City of Pacifica Public Works Department/ Contractors	City of Pacifica Planning Department City of Pacifica Planning Department	BIO-1d: Prior to the start of construction activities. BIO-1e: Prior to the start of and during construction activities.		

	being used at the site. • All applicable construction materials used on site, such as straw wattles, mulch, and fill material, will be certified weed free. • The Project will follow a Stormwater Pollution Prevention Plan as per the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009- DWQ) if applicable. • All disturbed soils will be stabilized and planted with a native seed mix from a local source following construction. • If excavating, soil and vegetation removed from weed-infested areas will not be used in general soil stockpiles and will not be redistributed as topsoil cover for the newly filled areas. All weed-infested soil will be disposed of off-site at a landfill or buried at least 2.5 feet below final grade.					
Cultural Resources						
Impact CUL-1: The Project could inadvertently encounter cultural resources. (Less than Significant with Mitigation Incorporated).	**Mitigation Measure CUL-1: Inadvertent Discovery of Resources.** In the event that historical, archaeological, tribal cultural, or paleontological resources are accidentally discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected. A qualified archaeologist or paleontologist must make an immediate evaluation, and avoidance measures or	City of Pacifica Public Works Department/ Contractors	City of Pacifica Planning Department	During Construction		

	appropriate mitigation should be completed, according to CEQA Guidelines. The State Office of Historic Preservation has issued recommendations for the preparation of Archaeological Resource Management Reports that may be used as guidelines. In the event that archaeological resources are discovered, the site should immediately be considered archaeologically sensitive and subject to the following conditions: development on archaeologically sensitive sites requires on-site monitoring by Native American consultant(s) if resources are Native American in origin in addition to a qualified archaeologist of all grading, excavation, and site preparation activities that involve earth-moving operations. It is recommended that if a newly discovered resource is, or is suspected to be, Native American in origin, the resource shall be treated as a significant Tribal Cultural Resource, pursuant to California Public Resources Code 21074, until USACE has determined otherwise with the consultation of a qualified archaeologist and local tribal representative. California laws and regulations state that if human remains are unearthed during construction, the County Coroner will be notified immediately, and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the					

	person(s) thought to be the Most Likely Descendent. Title to all archaeological sites and historic or cultural resources on or in the tide and submerged lands of California is Vested in the State under the jurisdiction of the State Lands Commission (Public Resources Code, §6313). If any cultural resources are discovered on State lands during construction, the City shall consult with the State Lands Commission Staff Attorney, Jamie Garrett. Final disposition of archaeological, historical, and paleontological resources recovered on State lands under the jurisdiction of the State Lands Commission must be approved by the Commission.					
Noise						
Impact NOI-1: The construction of the Project could result in the generation of a substantial temporary increase in ambient noise levels in excess of applicable standards established in the City's General Plan and Municipal Code (Less than Significant with Mitigation Incorporated).	**Mitigation Measure NOI-1a: Provide Notification of Construction Activities.** To ensure receptors in the vicinity of the Project are aware of the Project and its planned construction activities, the City and/or its designated contractors, contractor's representatives, or other appropriate personnel shall: 1. *Notify Residential and Commercial Land uses of Planned Construction Activities*. This notice shall be provided at least 14 calendar days prior to the start of any construction activities, describe the planned schedule of construction activities, describe the noise control measures to be implemented by the Project, and include the name and phone number of the designated contact for the	City of Pacifica Public Works Department/ Contractors	City of Pacifica Planning Department	NOI-1a: 14-Calendar Days Prior to Construction		

	City of Pacifica and its construction contractor responsible for handling construction-related noise complaints (per Section 3 of Mitigation Measure NOI-1b). This notice shall be provided to the owner/occupants of all residential dwelling units within 1,000 feet of construction work areas and the owner/occupants of commercial buildings within 500 feet of construction work areas. 2. *Notify Trail and Beach Users of Construction Activities.* The City shall post signs along overlook trails and trails leading to publicly accessible beaches within 500 feet of work areas warning of potential temporary elevated noise levels during construction. Signs shall remain posted throughout the duration of all sea wall installation activities. **Mitigation Measure NOI-1b: Reduce Construction Equipment Noise Levels.** To reduce potential noise levels associated with Project construction activities, the City and/or its designated contractors, contractor's representatives, or other appropriate personnel shall: a. Control Construction Traffic and Site Access. Construction truck traffic, including soil and debris and riprap hauling, equipment deliveries, and concrete and other vendor deliveries shall follow City-designated truck routes. Pursuant to City Municipal Code Section 4-7.1601, current designated truck routes in the City include Skyline Boulevard and State Highway Route 1. Pursuant to Municipal Code Section 4-7.1402(b), ingress and egress for the purpose of	City of Pacifica Public Works Department/ Contractors	City of Pacifica Planning Department	NOI-1b: During Construction		

	picking up or delivering construction-related materials shall occur via a direct route between the designated truck route and the Project site. Construction truck traffic shall avoid routes that contain residential dwelling units to the maximum extent feasible given specific Project location and access needs. b. Construction Equipment Selection, Use, and Noise Control Measures. The following measures shall apply to Project construction equipment: c. Contractors shall use the smallest size equipment capable of safely completing work activities. d. Construction staging activities such as receipt of deliveries, equipment and material storage, etc. shall occur as far away from residential land uses as possible. e. All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be shielded and located as far from sensitive receptor locations as practical. Shielding may consist of trailers, stored materials, or a three- or four-sided enclosure f. provided the structure/barrier breaks the line of sight between the equipment and the receptor and provides for proper ventilation and equipment operations. g. Heavy equipment engines shall be					

	equipped with standard noise suppression devices such as mufflers, engine covers, and engine/mechanical isolators, mounts, etc. These devices shall be maintained in accordance with manufacturer's recommendations during active construction activities. h. Pneumatic tools shall include a noise suppression device on the compressed air exhaust. i. The applicant/project representative and/or their contractor shall connect to existing electrical service at the site to avoid the use of stationary power generators (if feasible). j. No radios or other amplified sound devices shall be audible beyond the property line of the construction site. **Mitigation Measure NOI-1c: Install Temporary Noise Barrier along Esplanade Avenue.** To reduce potential construction noise levels at receptors on the east side of Esplanade Avenue, the City and/or its construction contractor shall install a temporary, six-foot-tall noise barrier along the eastern perimeter of the northern staging area. To the maximum extent feasible given site constraints and existing road/curb conditions, vehicular access to this staging area shall occur at the northern terminus of the barrier at Beaumont Avenue. The barrier shall consist of nominal 0.5-inch plywood with a minimum material density of 1.7 pounds per square foot installed at grade (or mounted to structures located at-grade, such as a K-Rail) and free of openings or gaps other	City of Pacifica Public Works Department/ Contractors	City of Pacifica Planning Department	NOI-1c: Prior to Construction		

	than weep holes). Alternatively, commercially available acoustic panels or other products such as acoustic barrier blankets that have a minimum sound transmission class or transmission loss value of 20 dB may be attached to a chain link or other security fence. The noise barrier may be removed following the completion of sea wall installation (i.e., it is not necessary during restoration or riprap removal phases). **Mitigation Measure NOI-1d: Prepare Construction Noise Complaint Plan.** To prepare for unanticipated or unexpected construction noise issues, the City and/or its designated contractors, contractor's representatives, or other appropriate personnel shall prepare a Construction Noise Complaint Plan that shall: 1. Identify the name and/or title and contact information (including phone number and email) for designated City and construction contractor representatives responsible for addressing construction-related noise issues. Include procedures describing how the designated Project representative will receive, respond, and resolve construction noise complaints. At a minimum, upon receipt of a noise complaint, the designated representative shall notify the City, verify and determine the nature of the complaint (e.g., identify the noise source generating the complaint), and take steps to resolve the complaint, such as, but not limited to, changing equipment operations, installing a temporary noise shield, etc.	City of Pacifica Public Works Department/ Contractors	City of Pacifica Planning Department	NOI-1d: Prior to Construction		

EXHIBIT B

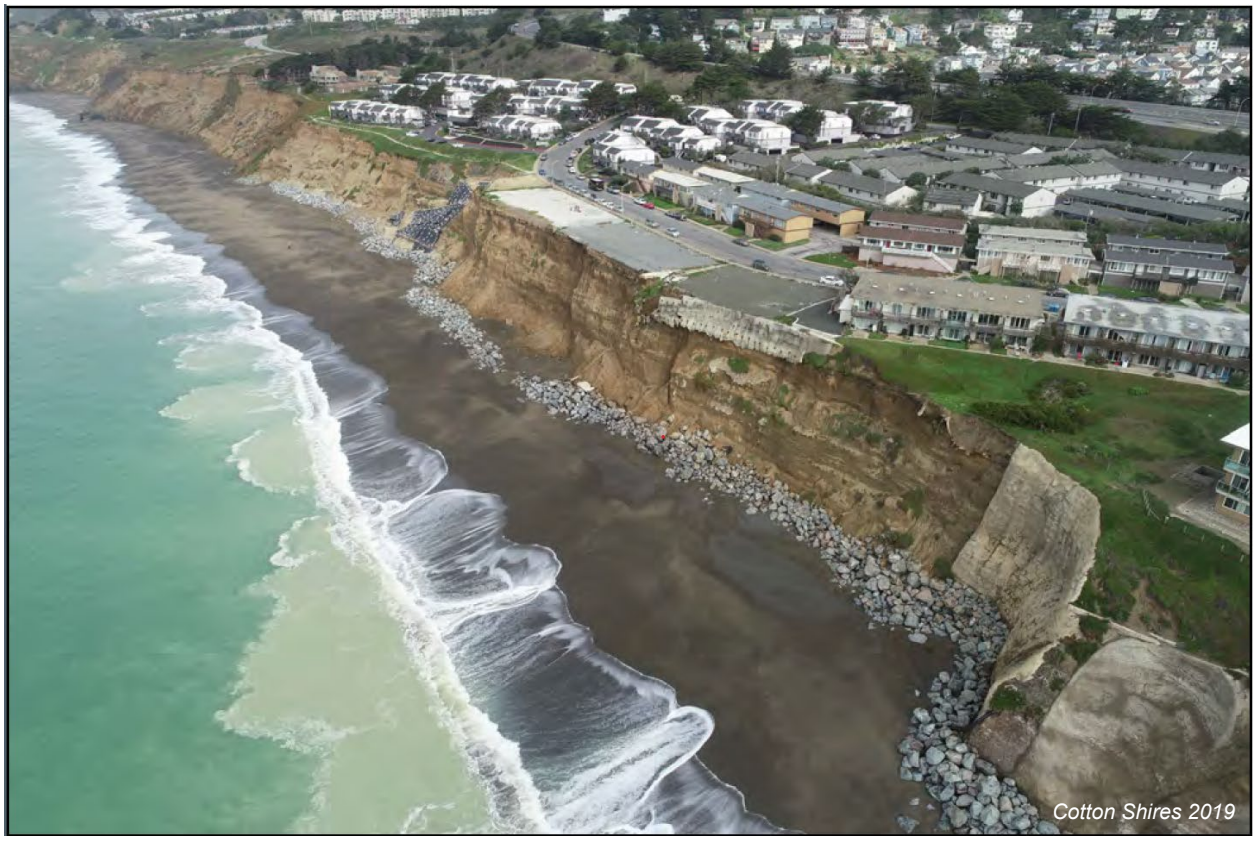
FINDINGS OF FACT

RESOLUTION NO. 52-2024

EXHIBIT B

CEQA Findings of Fact for the City of Pacifica 310-330 Esplanade Infrastructure Preservation Project Final Environmental Impact Report SCH# 2022100372

Lead Agency:
City of Pacifica
Planning Department
Planning Dept.
540 Crespi Drive (temporary)
Pacifica, CA 94044
www.cityofpacifica.org



June 2024

TABLE OF CONTENTS

CHAPTER 1. INTRODUCTION

An environmental impact report (EIR) was prepared for the proposed 10-330 Esplanade Avenue Infrastructure Preservation Project (Project) and circulated for a 45-day public review to solicit agency and public input on the analysis of the potential environmental effects associated with implementation of the Project. The Findings of Fact (Findings) presented herein address the environmental effects associated with the Project that are described and analyzed within the Final EIR. These Findings have been made pursuant to California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.), specifically Public Resources Code Sections 21081 and 21081.6, as well as the CEQA Guidelines (14 CCR 15000 et seq.) Sections 15091 and 15093.

Public Resources Code Section 21081 and CEQA Guidelines Section 15091 require that the City of Pacifica (City) as the Lead Agency for this project, prepare written findings for any identified significant environmental effects along with a brief explanation of the rationale for each finding. Specific findings under CEQA Guidelines Section 15091(a) are:

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 Final EIR.

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 Final EIR.

Further, in accordance with Public Resources Code Section 21081 and CEQA Guidelines Section 15093, whenever significant effects cannot be mitigated to below a level of significance, the City as the decision-making agency is required to balance, as applicable, the benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable," in which case the lead agency must adopt a formal statement of overriding considerations.

The Final EIR identified potentially significant environmental effects that could result from implementation of the project. Those effects were related to air quality, biological resources, cultural resources and noise, which would be reduced to below a level of significance. No significant unmitigable impacts were identified and thus a statement of overriding considerations is not required.

CHAPTER 2. PROJECT DESCRIPTION

The proposed Project design is based on a site specific geotechnical investigation commissioned by the City. The following provides additional details on the proposed seawall, its construction, and the proposed blufftop restoration.

Seawall

The proposed Project design includes several structural elements to fortify the bluff including a sheet pile wall below the low sand levels, a cap beam on top of the sheet pile wall also below the low sand level, and a shotcrete (sprayed concrete) wall secured to the bluff face with tensioned tieback rods/tendons drilled into the bluff face above the low sand level.

The wall is estimated to be 650 feet long, spanning the length between the existing seawall to the north at Land's End (Ocean Aire apartments) and the existing seawall to the south at 360-380 Esplanade Avenue. The height of the proposed seawall would extend from the base of the bluff to an elevation of 40 feet above sea level, which is approximately a height of 26 feet above the toe of the bluff, and would be constructed from structural shotcrete and anchored to the bluff with high tensioned tiebacks to support the weight of the wall. The tiebacks would consist of double corrosion protected high strength bars or multi-strand tendons installed in a minimum 6-inch diameter hole and declined roughly perpendicular to the bluff face at 15 to 30 degrees downward into the bluff approximately six inches. According to the Project plans, there would be three rows of tiebacks spanning the length of the wall, for a total of approximately 189 tiebacks. Extending the wall to an elevation of 40 feet (North American Vertical Datum of 1988 (NAVD88))2 allows the remainder of the bluff above to setback naturally to a stable slope. The buried portion of the seawall would extend approximately 20 feet below the sand levels to protect against wave scour from undermining the wall. The buried portion of the wall would consist of interconnected sheet piles that will be driven adjacent to the bluff and below the beach to an elevation of -10 feet NAVD88. The sheet piles will be installed with a suitably sized vibratory or impact hammer, capable of driving the sheets to their designed embedment depth.

Permanent Removal of Existing Riprap

Following construction of the proposed Project, all existing riprap on the beach coincident with 310-330 Esplanade Avenue (approximately 8,000 tons) would be removed from the Project site. The riprap would be removed within one year of the termination of construction for the Project. The riprap would be disposed of at an appropriate licensed facility.

Bluff Restoration Plan

The Project includes a blufftop restoration plan that involves replanting the developed areas along the top of the bluff within the Project site after the seawall construction is completed. The 0.72-acre restoration area is approximately 600 feet long and 60 to 70 feet wide and is currently covered with plastic, and drain rock. This area would be used as a staging area during construction of the seawall. Following the completion of seawall construction activities, the existing drain rock, and

any fill soils present will be removed, and a qualified restoration ecologist will ensure that the replacement soils meet appropriate requirements for soil and sediment characteristics for native northern coastal scrub restoration. If the soils are determined not to be suitable, the placement of a stable three-foot deep zone of horticulturally suitable soil may be required to facilitate long-term establishment of northern coastal scrub plantings. The objectives of the restoration include: (1) restoring upland native scrub habitat (northern coastal scrub); (2) increase runoff infiltration and control erosion; (3) provide habitat for native species; and (4) a minimum amount of long-term maintenance for establishment of plantings.

Hydroseed plantings are planned on the western-most portions of the blufftop, while the eastern-portions closest to Esplanade Avenue are anticipated to receive container plantings. An 8-foot wide asphalt pedestrian trail to provide public access is also shown, along decomposed granite paths to several benches along the length of the path. An interpretive sign would be installed near one of the benches. A cable fence would be installed to prevent visitors from accessing the bluff edge. Watering to establish and maintain the restoration plantings would be accomplished by hand. No irrigation system is proposed to be installed. The success of plant growth in the restoration area would be monitored for a minimum of three years.

Bluff Monitoring Program

An annual evaluation of the condition and performance of the seawall (bluff protection) would be undertaken as part of the Project. The evaluation would identify whether significant weathering, undermining, outflanking, overtopping, impacts, corrosion, or damage has occurred that would adversely impact the integrity or future performance of the structure. As part of the annual evaluation, measurements of differential retreat between the natural bluff face and the wall face, at the north and south ends of the protective devices, would be taken. In addition to the annual evaluation, a visual inspection of the seawall would be performed immediately after major wave events (as conditions permit) that may impact the wall or cause damage to the structure or nearby sections of shoreline, and after seismic events that create strong ground shaking in the Pacifica area.

The monitoring information would be summarized in a report prepared by a licensed engineer familiar with shoreline processes and would be submitted to the California Coastal Commission Executive Director after each winter storm season. After the first three years, the report would be provided each third year following the last annual report for that year. In addition, inspections with reports would be submitted immediately following either an “El Niño” storm event (comparable to or greater than a 20-year storm) or an earthquake of Magnitude 5.5 or greater with an epicenter in San Mateo or San Francisco counties.

It is reasonably foreseeable that additional construction or repair work may be required to address issues identified in the monitoring reports, however, it is too speculative to define such repairs with any degree of specificity in this EIR. Supplemental environmental review and Project approvals would be required before any such additional construction or repair work would be done.

Construction

Construction of the seawall is estimated to take 260 calendar days and would occur between spring to early winter. Anticipated equipment includes large excavators, crane(s) on top of the bluff, heavy duty tieback drilling equipment, and heavy-duty sheet pile driving equipment (vibratory or impact hammer) on the beach. All existing loose slope debris material located on the lower portions of the bluff between the proposed sheet pile wall alignment and the bluff face would be excavated to expose undisturbed terrace deposit material. The sheet piles would be installed above the high tide line. All of the work, including the sheet pile installation, will be constructed during naturally dewatered conditions (i.e. low tide) in dry sand without the need for artificial dewatering (e.g., use of pumps or coffer dams). The only time that artificial dewatering would be required is if an unanticipated storm/rogue wave topped the temporary riprap wave protection installed around the work area and flooded the construction area. Under those circumstances, small submersible pumps and hoses would be used for dewatering operations. No vehicles or heavy equipment would be operated in open water or tidal habitat. Access to the site by foot and small machinery would occur through the public access trail at 100 Esplanade Avenue directly north of the site. Larger equipment would either be lowered from the blufftop via crane or driven to the work area during low tides from the existing beach access located opposite Manor Drive, at the south end of the Project site.

Artificial dewatering would be required for excavations extending below +5 feet NAVD88; however, no excavations that deep are anticipated. The sheet piles would be driven into place and would not require excavation to install. The excavation would be limited to the depth required to install the wall below the sand and the pile cap that sits atop the sheet pile, which according to the plans extends to a depth of +7 feet NAVD88. As previously stated, isolated artificial dewatering could be required if unanticipated storm/rogue waves topped the temporary riprap wave protection measures.

Construction of the proposed seawall would occur on both weekdays and weekends. Because the construction requires a building permit from the City, the days and hours of construction would adhere to the provisions of the Pacifica Municipal Code Section 8-1.05 (Title 8. – Building Regulations, Chapter 1. – Building Code), which limits construction to the hours of 7:00 AM to 7:00 PM Monday through Friday, and from 9:00 AM to 5:00 PM on Saturday and Sunday.

Equipment Staging and Material Storage

Two equipment staging and material storage areas are designated for the Project. The north staging area would be located on the blufftop in the 310 to 330 block of Esplanade Avenue and would be set back a minimum of 10 feet from the bluff edge. The south staging area would be located on the City-owned blufftop property south of 380 Esplanade opposite of Manor Drive, adjacent to the existing ramp that would provide equipment access to the beach. This ramp has also provided public access to the beach, but is currently closed. Following the construction phase of the Project, the ramp would again be available for public access to the beach. A crane pad would be established in the north staging area. As the first part of site preparation, the staging and material storage areas would be fenced, and signage installed to identify the area as the staging and storage area and to keep the public from entering the area. The north staging area is currently fenced with chain link

for public safety. The staging and material storage areas would have one point of ingress and egress to and from Esplanade Avenue. All concrete washout basins would be contained in designated locations within these staging/storage areas. Lighting facilities with generators may be used in these areas. A designated parking area for construction workers would also be established in these areas.

Drainage

Following construction, the blufftop between 310 and 330 Esplanade Avenue would be recontoured to ensure that the blufftop slopes uniformly towards Esplanade Avenue to direct stormwater sheet flow towards Esplanade Avenue and away from the bluff face. Recontouring is anticipated to require less than 50 cubic yards of imported material. After construction of the seawall, during the early winter months (e.g., November through January), the top of the bluff would be revegetated with native, drought tolerant species suitable for blufftop habitat to protect the bluff from surface runoff and associated erosion. Native plantings would be hand watered only through establishment of the vegetation; an irrigation system would not be installed for the plantings.

Best Management Practices

Best management practices (BMPs) to address fugitive dust and water quality during construction will be included in Project plans and specifications and therefore included as part of the Project. They are not considered mitigation.

Fugitive Dust Control. Fugitive dust emissions are considered potentially significant in the BAAQMD's CEQA Guidelines, regardless of the quantity of PM_{10} or $PM_{2.5}$ emitted, unless the BAAQMD's eight recommended fugitive dust control BMPs are implemented during construction activities (BAAQMD 2023, pg. 5-5). Accordingly, to reduce fugitive dust that would be generated during Project construction activities, the City will incorporate the following BAAQMD basic dust control measures into the proposed Project:

- Water all exposed surfaces (e.g., staging areas, soil piles, graded areas, and unpaved access roads) two times per day during construction and adequately wet demolition surfaces to limit visible dust emissions.
- Cover all haul trucks transporting soil, sand, or other loose materials off the project site.
- Use wet power vacuum street sweepers at least once per day to remove all visible mud or dirt track-out onto adjacent public roads (dry power sweeping is prohibited) during construction of the Project.
- Vehicle speeds on unpaved roads/areas shall not exceed 15 miles per hour.
- Complete all areas to be paved as soon as possible and lay building pads as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time of diesel-powered construction equipment to five minutes and post signs reminding workers of this idling restriction at access points and equipment staging areas during construction of the Project.

- Maintain and properly tune all construction equipment in accordance with manufacturer's specifications and have a California Air Resources Board (CARB)-certified visible emissions evaluator check equipment prior to use at the site.
- Post a publicly visible sign with the name and telephone number of the construction contractor and City staff person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The publicly visible sign shall also include the contact phone number for the Bay Area Air Quality Management District to ensure compliance with applicable regulations.

Water Quality During Construction. Construction projects in California causing land disturbances that are equal to 1.0 acre or greater must comply with State requirements to control the discharge of stormwater pollutants under the National Pollutant Discharge Elimination System Construction General Permit (CGP). Prior to the start of construction/demolition, a Notice of Intent (NOI) must be filed with the State Water Board describing the Project. A Stormwater Pollution Prevention Plan (SWPPP) must be developed and maintained during project construction and it must include the use of BMPs to protect water quality until the site is stabilized. Standard permit conditions under the Construction General Permit require that the applicant utilize various measures including on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors. Compliance with regulatory and permitting requirements such as the Construction General Permit is considered part of the Project, and the BMPs would not be considered mitigation.

CHAPTER 3. PROJECT OBJECTIVES

The City identified project objectives for the long-term growth and enhancement of the community, and to develop a reasonable range of alternatives to analyze within the EIR. These are:

1. Halt bluff toe erosion toward Esplanade Avenue and its critical infrastructure (roadway, water, sewer, and other utilities), to prevent infrastructure collapse due to bluff erosion for at least 30 years.
2. Minimize impacts to sensitive resources, such as sand supply, beach access, ecological function, water quality, and shoreline aesthetics.
3. Provide public access to ocean views from Esplanade Avenue, except where public access would endanger public safety or fragile coastal resources. These objectives have been considered in preparing the findings and statement of overriding considerations contained herein.

CHAPTER 4. GENERAL CEQA FINDINGS

Based on the foregoing Findings and the information contained in the administrative record, and as conditioned by the foregoing:

4.1 Findings Regarding Recirculation

The City finds that the Draft PEIR does not require recirculation under CEQA (CEQA Section 21092.1, CEQA Guidelines Section 15088.5). CEQA Guidelines Section 15088.5 requires recirculation of an EIR prior to certification of the Final EIR when "significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review." As described in CEQA Guidelines Section 15088.5:

"New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

In addition, CEQA Guidelines Section 15088.5(b) provides that "recirculation is not required where the new information added to the EIR merely clarifies and amplifies or makes insignificant modifications in an adequate EIR." Recirculation also is not required simply because new information is added to an EIR – oftentimes new information is added given CEQA's public/agency comment and response process and CEQA's post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies. As established in Laurel Heights Improvement Assn. v. Regents of University of California ([1993] 6 Cal.4th 1112, 1132), recirculation is intended to be an exception rather than the general rule.

As such, the City makes the following Findings:

1. None of the public comments submitted to the City regarding the Draft EIR present any significant new information that would require the Draft EIR to be recirculated for public review.

2. No new or modified mitigation measures are proposed that would have the potential to create new significant environmental impacts.

3. The Draft EIR adequately analyzed the Project alternatives and there are no feasible alternatives or mitigation measures considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project.

4. The Draft EIR was not fundamentally and basically inadequate and conclusory in nature and did not preclude meaningful public review and comment.

In this legal context, the City finds that recirculation of the Draft EIR prior to certification is not required. In addition to providing responses to comments, the Final EIR includes revisions to expand upon information presented in the Draft EIR (Section 4, Errata and Revisions); explain or enhance the evidentiary basis for the Draft EIR's findings; update information; and to make clarifications, amplifications, updates, or helpful revisions to the Draft EIR. The Final EIR's revisions, clarifications, and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact.

In sum, the Final EIR demonstrates that the Project would not result in any new significant impacts or increase the severity of a significant impact compared to the analysis presented in the Draft EIR. The changes reflected in the Final EIR also do not indicate that meaningful public review of the Draft EIR was precluded in the first instance. Accordingly, recirculation of the EIR is not required because revisions to the EIR are not significant as defined in Section 15088.5 of the CEQA Guidelines.

CHAPTER 5. FINDINGS OF FACT

Having received, reviewed, and considered the information in the Final EIR for this project, as well as the supporting administrative record, the City hereby makes findings pursuant to, and in accordance with, Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

5.1 Environmental Effects Found Not to be Significant

The subject project-level EIR is intended to serve as a public information and disclosure document identifying and analyzing those environmental impacts resulting from the project that are expected to be significant and describing mitigation measures and alternatives that could avoid or reduce significant adverse impacts and increase beneficial effects. Through project scoping and the environmental analysis contained within the Final EIR, it was determined that the Project would not result in a potential significant effect on the environment with respect to aesthetics, agricultural and forestry resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire. No further findings are required for these subject areas.

5.2 Findings for Significant but Mitigated Effects

The following findings have been made for the significant environmental effects identified in the EIR related to air quality, biological resources, cultural resources and noise.

> **Impact AIR-3:** The Project could expose sensitive receptors to substantial pollutant concentrations and associated adverse health risks.

Finding: Changes or alterations have been required in, or incorporated into, the Project which would avoid or substantially lessen the significant environmental effect as identified in the Final EIR. (CEQA Section 15091(a)(1)).

Mitigation Measures: Pursuant to CEQA Guidelines Section 15091, the following mitigation measures have been included in a mitigation monitoring and reporting program (MMRP) that is to be adopted concurrently with these findings.

> **Mitigation Measure AIR-3:** To reduce potential, short-term adverse health risks associated with $PM_{2.5}$ exhaust emissions, including emissions of DPM generated during Project construction activities, the City shall require its designated contractors, contractor's representatives, and/or other appropriate personnel to comply with the following construction equipment restrictions. All mobile construction equipment greater than 50 horsepower in size shall meet with U.S. EPA and CARB Tier IV interim exhaust emission standards. This may be achieved via the use of equipment with engines that have been certified to meet U.S. EPA and CARB Tier IV interim emissions standards, or through the use of equipment that has been retrofitted with a CARB-verified diesel emission control

strategy (e.g., particulate filter) capable of reducing exhaust $PM_{2.5}$ emissions to levels that meet U.S. EPA and CARB Tier IV interim emissions standards.

As an alternative to having all mobile construction equipment greater than 50 horsepower meet with U.S. EPA and CARB Tier IV interim exhaust emission standards, the City may prepare a refined construction health risk assessment once additional Project-specific construction information is known (e.g., specific construction equipment type, quantity, engine tier, and runtime by phase). The refined health risk assessment shall demonstrate and identify any measures necessary such that the proposed Project's incremental carcinogenic health risk at nearby sensitive receptor locations is below the applicable BAAQMD threshold of 10 cancers in a million.

Significance after Mitigation: With the incorporation of the above mitigation measures, significant environmental effects to air quality would be reduced to less than significant.

Impact BIO-1: The Project could have a significant adverse effect, either directly or through habitat modifications, on special-status fish (steelhead, Coho salmon, and green sturgeon), Essential Fish Habitat (EFH), and American peregrine falcon and other nesting birds. Implementation of Mitigation Measures BIO-1a, 1b and 1c would reduce potential impacts to a less than significant level.

Finding: Changes or alterations have been required in, or incorporated into, the Project which would avoid or substantially lessen the significant environmental effect as identified in the Final EIR. (CEQA Section 15091(a)(1)).

Mitigation Measures: Pursuant to CEQA Guidelines Section 15091, the following mitigation measures have been included in a mitigation monitoring and reporting program (MMRP) that is to be adopted concurrently with these findings.

Mitigation Measure BIO-1a: Best Management Practices (BMPs) to Protect Water Quality, Special-Status Fish, and EFH

The project shall minimize to the greatest extent feasible all construction in tidal / open water habitat areas. During all construction in and near tidal aquatic habitat, standard BMPs shall be used to minimize erosion and impacts to water quality as well as direct impacts to special-status fish and EFH. The following BMPs shall be included in the Project to minimize erosion, impacts to water quality, and impacts to special-status species (also see BMPs in Chapter 3.3.9, of the Project Description):

- The contractor shall monitor the tides and coordinate work to avoid construction activities in open water habitat. The timing and elevation of tides can be monitored by checking the San Francisco NOAA tidal station (#9414290) found online at https://tidesandcurrents.noaa.gov/noaatidepredictions.html?id=9414290. Because the Project area is approximately 16 miles south of the tidal station, the actual timing and elevation of tides needs to be adjusted specifically for the Project area.
- No vehicles or heavy equipment shall be operated in open water habitat.

- Earthmoving and clearing activities shall be performed in dry weather only.
- Spoils shall be removed promptly and stockpiling of fill materials shall be avoided when rain is forecast. Stockpiles shall only be placed in designated locations, including near the 500 Esplanade ramp and at the staging area at the 310-330 lots at least 20 feet from the bluff face. No stockpiles shall be located on the beach. Soil stockpiles and other materials shall be covered with a tarp or other waterproof material during rain events.
- In the event of rain, all grading work is to cease immediately.
- Implement an erosion control plan during the wet season (October 15 through April 15), including, at a minimum, the following:
    - During the rainy season, all paved areas will be kept clear of earth material and debris.
    - Inlet protection will be installed at open inlets to prevent sediment from entering the storm drain system.
    - Straw rolls will be placed at the toe of slopes, and along the down slope perimeter of the Project area.
- Equipment staging and parking of vehicles shall occur on defined staging areas only.
- The integrity and effectiveness of erosion control measures shall be inspected on a daily basis or as required under the approved SWPPP. Corrective actions and repairs shall be carried out immediately for ineffective BMPs.
- Fueling, washing, and maintenance of vehicles shall occur in the defined staging areas, away from open water habitat. Equipment shall be regularly maintained to avoid fluid leaks. Any leaks shall be captured in containers until equipment is moved to a repair location. Hazardous materials shall be stored only within the defined staging areas. Containment and cleanup plans shall be prepared and implemented for the immediate cleanup of fluid or hazardous materials spills.
- Sediment-laden water shall not be allowed to enter the ocean.
- All litter and construction debris shall be disposed of off-site in accordance with state and local regulations. All trash and debris within the work area shall be placed in containers with secure lids before the end of work each day to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish. If containers meeting these criteria are not available, all rubbish shall be removed from the study area on a daily basis.
- Discharge of all potential pollutants, including solid wastes, paints, concrete, petroleum products, chemicals, wash water or sediment and non-stormwater discharges to storm drains and water courses shall be controlled and prevented.

- A hazardous spill plan shall be developed prior to construction. The plan shall describe what actions shall be taken in the event of a spill. The plan shall also incorporate preventative measures to be implemented, such as vehicle and equipment staging, cleaning, maintenance, and refueling; and contaminant (including fuel) management and storage. In the event of a contaminant spill, work at the site shall immediately cease until the contractor has contained and mitigated the spill. The contractor shall immediately prevent further contamination and notify appropriate authorities and mitigate damage as appropriate. Adequate spill containment materials, such as oil diapers and hydrocarbon cleanup kits, shall be available on site at all times. Containers for storage, transportation, and disposal of contaminated absorbent materials shall be provided in the study area.
- Trash and construction related solid wastes shall be deposited into a covered receptacle to prevent contamination and dispersal by wind. Trash and solid waste shall not be stored on the beach.
- Work areas that are temporarily impacted shall be restored with respect to pre-existing contours and conditions, to the extent feasible, upon completion of work. Restoration work including revegetation and soil stabilization will be evaluated upon completion of work and performed, as needed. Construction materials and wastes shall be stored, handled, and disposed of properly, so as to prevent their contact with stormwater.

Mitigation Measure BIO-1b: Pre-Construction/Pre-Disturbance Surveys for Nesting Birds

Avoidance. To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Mateo County extends from February 1 through September 15.

Pre-Construction Surveys. If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during Project implementation. These surveys will be conducted no more than five days prior to the initiation of any site disturbance activities and equipment mobilization. If Project activities are delayed by more than five days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all potential nesting habitats (e.g., shrubs, ruderal areas, cliff terraces, etc.) in and immediately adjacent to the impact area and a 250-foot buffer around the area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found in the impact area or the 250 foot buffer, the biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 1000 feet for raptors and up to 250 feet for other species though this may sometimes be reduced

in urban areas at the discretion of the biologist), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged. Monitoring will be required to ensure compliance with MBTA and relevant California Fish and Game Code requirements. Monitoring dates and findings will be documented.

Mitigation Measure BIO-1c: Invasive Species Best Management Practices

The following measures will be implemented to limit the spread of invasive species into native habitats:

- All ground disturbing equipment used adjacent to native habitats will be washed (including wheels, tracks, and undercarriages) at a legally operating equipment yard both before and after being used at the site.
- All applicable construction materials used on site, such as straw wattles, mulch, and fill material, will be certified weed free.
- The Project will follow a Stormwater Pollution Prevention Plan as per the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Water Board Order No. 2009-0009- DWQ) if applicable.
- All disturbed soils will be stabilized and planted with a native seed mix from a local source following construction.
- If excavating, soil and vegetation removed from weed-infested areas will not be used in general soil stockpiles and will not be redistributed as topsoil cover for the newly filled areas. All weed-infested soil will be disposed of off-site at a landfill or buried at least 2.5 feet below final grade.

Significance after Mitigation: With the incorporation of the above mitigation measures, significant environmental effects to biological resources (Water Quality, Special-Status Fish and EFH, Nesting Birds, Invasive Species) would be reduced to less than significant.

Impact CUL-1: The Project could inadvertently encounter cultural resources.

Finding: Changes or alterations have been required in, or incorporated into, the Project which would avoid or substantially lessen the significant environmental effect as identified in the Final EIR. (CEQA Section 15091(a)(1)).

Mitigation Measures: Pursuant to CEQA Guidelines Section 15091, the following mitigation measures have been included in a mitigation monitoring and reporting program (MMRP) that is to be adopted concurrently with these findings.

Mitigation Measure CUL-1: Inadvertent Discovery of Resources.

In the event that historical, archaeological, tribal cultural, or paleontological resources are accidentally discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected. A qualified archaeologist or paleontologist must make an immediate evaluation, and avoidance measures or appropriate mitigation should be completed, according to CEQA Guidelines. The State Office of Historic Preservation has issued recommendations for the preparation of Archaeological Resource Management Reports that may be used as guidelines. In the event that archaeological resources are discovered, the site should immediately be considered archaeologically sensitive and subject to the following conditions: development on archaeologically sensitive sites requires on-site monitoring by Native American consultant(s) if resources are Native American in origin in addition to a qualified archaeologist of all grading, excavation, and site preparation activities that involve earth-moving operations.

It is recommended that if a newly discovered resource is, or is suspected to be, Native American in origin, the resource shall be treated as a significant Tribal Cultural Resource, pursuant to California Public Resources Code 21074, until USACE has determined otherwise with the consultation of a qualified archaeologist and local tribal representative.

California laws and regulations state that if human remains are unearthed during construction, the County Coroner will be notified immediately, and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent.

Title to all archaeological sites and historic or cultural resources on or in the tide and submerged lands of California is Vested in the State under the jurisdiction of the State Lands Commission (Public Resources Code, §6313). If any cultural resources are discovered on State lands during construction, the City shall consult with the State Lands Commission Staff Attorney, Jamie Garrett. Final disposition of archaeological, historical, and paleontological resources recovered on State lands under the jurisdiction of the State Lands Commission must be approved by the Commission.

Significance after Mitigation: With the incorporation of the above mitigation measures, significant environmental effects to cultural resources (Inadvertent Discovery of Resources) would be reduced to less than significant.

Impact NOI-1: The construction of the Project could result in the generation of a substantial temporary increase in ambient noise levels in excess of applicable standards established in the City's General Plan and Municipal Code.

Finding: Changes or alterations have been required in, or incorporated into, the Project which would avoid or substantially lessen the significant environmental effect as identified in the Final EIR. (CEQA Section 15091(a)(1)).

Mitigation Measures: Pursuant to CEQA Guidelines Section 15091, the following mitigation measures have been included in a mitigation monitoring and reporting program (MMRP) that is to be adopted concurrently with these findings.

Mitigation Measure NOI-1a: Provide Notification of Construction Activities.

To ensure receptors in the vicinity of the Project are aware of the Project and its planned construction activities, the City and/or its designated contractors, contractor's representatives, or other appropriate personnel shall:

1. *Notify Residential and Commercial Land uses of Planned Construction Activities.* This notice shall be provided at least 14 calendar days prior to the start of any construction activities, describe the planned schedule of construction activities, describe the noise control measures to be implemented by the Project, and include the name and phone number of the designated contact for the City of Pacifica and its construction contractor responsible for handling construction-related noise complaints (per Section 3 of Mitigation Measure NOI-1b). This notice shall be provided to the owner/occupants of all residential dwelling units within 1,000 feet of construction work areas and the owner/occupants of commercial buildings within 500 feet of construction work areas.
2. *Notify Trail and Beach Users of Construction Activities.* The City shall post signs along overlook trails and trails leading to publicly accessible beaches within 500 feet of work areas warning of potential temporary elevated noise levels during construction. Signs shall remain posted throughout the duration of all sea wall installation activities.

Mitigation Measure NOI-1b: Reduce Construction Equipment Noise Levels. To reduce potential noise levels associated with Project construction activities, the City and/or its designated contractors, contractor's representatives, or other appropriate personnel shall:

a. Control Construction Traffic and Site Access. Construction truck traffic, including soil and debris and riprap hauling, equipment deliveries, and concrete and other vendor deliveries shall follow City-designated truck routes. Pursuant to City Municipal Code Section 4-7.1601, current designated truck routes in the City include Skyline Boulevard and State Highway Route 1. Pursuant to Municipal Code Section 4-7.1402(b), ingress and egress for the purpose of picking up or delivering construction-related materials shall occur via a direct route between the designated truck route and the Project site. Construction truck traffic shall avoid routes that contain

residential dwelling units to the maximum extent feasible given specific Project location and access needs.

b. Construction Equipment Selection, Use, and Noise Control Measures. The following measures shall apply to Project construction equipment:

c. Contractors shall use the smallest size equipment capable of safely completing work activities.

d. Construction staging activities such as receipt of deliveries, equipment and material storage, etc. shall occur as far away from residential land uses as possible.

e. All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be shielded and located as far from sensitive receptor locations as practical. Shielding may consist of trailers, stored materials, or a three- or four-sided enclosure.

f. provided the structure/barrier breaks the line of sight between the equipment and the receptor and provides for proper ventilation and equipment operations.

g. Heavy equipment engines shall be equipped with standard noise suppression devices such as mufflers, engine covers, and engine/mechanical isolators, mounts, etc. These devices shall be maintained in accordance with manufacturer's recommendations during active construction activities.

h. Pneumatic tools shall include a noise suppression device on the compressed air exhaust.

i. The applicant/project representative and/or their contractor shall connect to existing electrical service at the site to avoid the use of stationary power generators (if feasible).

j. No radios or other amplified sound devices shall be audible beyond the property line of the construction site.

Mitigation Measure NOI-1c: Install Temporary Noise Barrier along Esplanade Avenue.

To reduce potential construction noise levels at receptors on the east side of Esplanade Avenue, the City and/or its construction contractor shall install a temporary, six-foot-tall noise barrier along the eastern perimeter of the northern staging area. To the maximum extent feasible given site constraints and existing road/curb conditions, vehicular access to this staging area shall occur at the northern terminus of the barrier at Beaumont Avenue. The barrier shall consist of nominal 0.5-inch plywood with a minimum material density of 1.7 pounds per square foot installed at grade (or mounted to structures located at-grade, such as a K-Rail) and free of openings or gaps other than weep holes). Alternatively,

commercially available acoustic panels or other products such as acoustic barrier blankets that have a minimum sound transmission class or transmission loss value of 20 dB may be attached to a chain link or other security fence. The noise barrier may be removed following the completion of sea wall installation (i.e., it is not necessary during restoration or riprap removal phases).

Mitigation Measure NOI-1d: Prepare Construction Noise Complaint Plan.

To prepare for unanticipated or unexpected construction noise issues, the City and/or its designated contractors, contractor's representatives, or other appropriate personnel shall prepare a Construction Noise Complaint Plan that shall:

1. Identify the name and/or title and contact information (including phone number and email) for designated City and construction contractor representatives responsible for addressing construction-related noise issues.

2. Include procedures describing how the designated Project representative will receive, respond, and resolve construction noise complaints. At a minimum, upon receipt of a noise complaint, the designated representative shall notify the City, verify and determine the nature of the complaint (e.g., identify the noise source generating the complaint), and take steps to resolve the complaint, such as, but not limited to, changing equipment operations, installing a temporary noise shield, etc.

Significance after Mitigation: With the incorporation of the above mitigation measures, significant environmental effects related to noise (Notification of Construction Activities, Construction Equipment Noise, Temporary Noise Barriers, Construction Noise Complaint Plan) would be reduced to less than significant.

5.3 Mitigation Monitoring and Reporting Program

As referenced above in the findings, a MMRP has been prepared for the project and is to be adopted concurrently with these findings and statement of overriding considerations pursuant to Public Resources Code Section 21081(a)(1). The MMRP is a separate stand-alone document that will be used by the City to track compliance with the project mitigation measures. The MMRP will remain available for public review during the compliance period, which includes pre-construction coordination, construction, and post-construction documentation for future development projects.

CHAPTER 6. ALTERNATIVES

CEQA requires that an EIR describe a range of reasonable alternatives to a project, or to the location of the project, which could feasibly attain the basic objectives of that project, and to evaluate the comparative merits of the alternatives (14 CCR 15126.6[a]). The CEQA Guidelines direct that the selection of alternatives be governed by "a rule of reason" (14 CCR 15126.6[a], [f]). As defined by the CEQA Guidelines, "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth 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. Of those alternatives, the EIR needs to examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project" (14 CCR 15126.6[f]).

6.1 Alternatives Considered and Eliminated During the Scoping/Project Planning Process

While selecting alternatives to be considered for analysis, the City focused on alternatives which could potentially reduce the significant effects of the project and would also achieve project objectives. One overarching objective of the project is to protect existing infrastructure in Esplanade Avenue. Therefore, the extent to which the infrastructure would be protected was analyzed for each alternative.

The EIR impact analysis did not identify any potentially significant impacts requiring mitigation or significant and unavoidable impacts associated with implementation of the Project.

The CEQA Guidelines provide that an EIR should "identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination" (14 CCR 15126.6[c]). The following is a discussion of the Project alternatives proposed during the scoping and planning process and the reasons they were not selected for detailed analysis in the EIR.

6.2 Alternatives Selected for Further Analysis

This section discusses a reasonable range of alternatives to the proposed Project, including a No Project Alternative, in compliance with CEQA Guidelines Section 15126.6(e). These alternatives are as follows:

- Alternative 1: No Project Alternative
- Alternative 2: Grading of the Bluff
- Alternative 3: Sand Replacement
- Alternative 4: Rock Revetment

These alternatives are evaluated for their ability to avoid or substantially lessen the impacts of the proposed Project identified in the EIR, and in consideration of their ability to meet the basic objectives of the proposed Project as described in the EIR.

6.2.1 Alternative 1: No Project

State CEQA Guidelines Section 15126.6(e) requires an EIR to analyze the specific alternative of "No Project". The purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impact of not approving the proposed project. The No Project Alternative must discuss the existing conditions at the time the EIR notice of preparation is published, as well as 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.

Under the No Project Alternative, the impacts of the proposed Project would be compared to the impacts that would occur under the existing site conditions. Although the No Project Alternative does not meet any of the Project objectives and was not considered a viable project alternative, it was nonetheless included for analysis in the EIR as required by CEQA.

Principal Characteristics

Under the No Project Alternative, the City would not construct seawalls or implement any other type of protection of the coastal bluff along Esplanade Avenue in the proposed Project area (310-330 Esplanade Avenue). The bluff would continue to erode and retreat, and would be expected to adversely impact the Esplanade Avenue infrastructure within a short period of time. The average bluff retreat rate over the past 75 years at 330 Esplanade Avenue is roughly 2-1/2 feet per year, however, it is not unusual to lose ten feet per year. In 2016 the bluff at the project location retreated approximately seven feet in some locations.16

Under the No Project Alternative, the City would not replant the developed areas along the top of the bluff within the project site to restore native scrub habitat on top of the bluff within the project site, and no other passive recreational facilities (pedestrian path, benches) would be constructed. The blufftop would remain vacant, fenced with chain link fencing, covered with base rock and eroding shotcrete with patches of non-native vegetation.

Finding for Alternative 1: No Project Alternative

The No Project Alternative would not meet any of the project objectives and would not allow the City to control erosion of the bluff and protect infrastructure in the Esplanade Avenue area.

Rationale

The impacts of the No Project Alternative are examined qualitatively to allow comparison with the Project. The City does not contain agricultural, forestry, or mineral resources, and is not located in a Very High Fire Hazard Severity zone and does not represent features that would substantially alter the wildfire risk in the area. The Project also does not involve Population and Housing-related issues. Therefore, these topics are not discussed below. They are discussed in Chapter 6 - CEQA Mandated Section of this EIR.

a. *Aesthetics.* The DEIR analysis found the aesthetic impacts of the proposed infrastructure preservation project to be less than significant. The Project would not have a substantial adverse effect on a scenic vista, damage scenic resources within a state designated highway, conflict with applicable zoning or other city regulations governing scenic quality or create a new source of light and glare. Although no significant impact would result, the analysis notes that temporary nighttime lighting during the construction period could occur on the blufftop areas where construction equipment is staged. For this reason, the No Project Alternative could result in a slight reduction of impacts compared to the Project.

b. *Air Quality.* The DEIR analysis found the impacts of the proposed infrastructure preservation project to be less than significant. Potential impacts were related to short-term construction vehicle emissions of criteria pollutants and fugitive dust emissions. The No Project Alterative would result in no new construction at the project site, and therefore no construction related emissions of criteria pollutants or fugitive dust compared to the Project. As such, the No Project Alternative would have no Air Quality impact, but air quality impacts would be reduced in number and level of emissions compared to the Project.

c. *Biological Resources.* The DEIR analysis found the impacts of the infrastructure preservation Project on biological resources to be potentially significant under Impact BIO-1. However, implementation of Mitigation Measures BIO-1, BIO-2 and BIO-3 would reduce the Project's potentially significant impacts to less than significant. The No Project Alternative would not include proposed blufftop restoration activities that could improve native plant habitat, and in addition could result in soil and existing remnant pieces of shotcrete and rebar on the bluff face falling down to the beach and ocean below as erosion of the bluff proceeds unimpeded. This could potentially affect biological resources in these areas. For these reasons, the No Project Alternative could potentially have a greater, although still less than significant Biological Resources impact compared to the Project.

d. *Cultural Resources and Tribal Cultural Resources*. The DEIR analysis concluded the Project would have a less than significant impact related to Cultural Resources and Tribal Cultural Resources. Although it is not likely that there are archaeological remains or artifacts within the project site due to its location on the beach and prior ground disturbing activities that occurred during construction of the existing buildings on the top of the bluff, the possibility exists that buried archaeological and historical resources, including tribal cultural resources could be discovered during construction of the Project. The Project therefore includes Mitigation Measure CUL-1 that construction contractors would be required to follow that would ensure the protection and proper treatment of such resources. Under the No Project Alternative, there would be no construction activities that could potentially impact buried archaeological and historical resources, including tribal cultural resources. Thus, the No Project Alternative is considered to have a reduced level of impact compared to the Project.

e. *Energy.* The DEIR analysis concluded that the Project would not result in operational uses that would increase energy consumption and therefore would not result in a potentially

significant environmental effect due to wasteful, inefficient, or unnecessary consumption of energy resources. In addition, as the proposed Project involves the construction of a seawall for coastal bluff fortification and would not increase energy consumption over the long term, it would neither conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. The No Project Alternative would result in no increases in energy consumption over existing conditions and would therefore also not result in a potentially significant environmental effect due to wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency.

f. *Geology and Soils.* The DEIR analysis found that the Project's Geology and Soils impacts would be less than significant. Under the No Project Alternative there would be no construction, and therefore impacts related to seismic conditions (faults, liquefaction, ground failure), soil erosion, landslides and expansive soils would be irrelevant. The No Project Alternative would result in lesser Geology and Soils impacts than the Project.

g. *Greenhouse Gas Emissions.* The DEIR analysis found that the Project would generate GHG emissions from short-term construction activities, but would not generate any long-term, operational GHG emissions because it does not involve active operations or energy use following bluff stabilization. The Project also would not conflict with any plan or policy adopted for the purposes of reducing GHG emissions, including the CARB Scoping Plan, the BAAQMD Clean Air Plan, and the Pacifica Climate Action Plan. Most of the policies and control measures contained in these plans would be implemented at the state or regional level and would not directly apply to the Project. In addition, the Project will incorporate BMP AIR-1 and Mitigation Measure BMP NOI-1, which would reduce GHG emissions from construction equipment. Therefore, these impacts would be less than significant. The No Project Alternative would not generate either short-term or long-term emissions as it proposes no construction activities, and therefore would result in no impact.

h. *Hazards and Hazardous Materials.* The DEIR analysis found that the Project's impacts to Hazards and Hazardous Materials would be less than significant. Construction of the Project would involve the use of hazardous materials (fuels, oils and other vehicle-related products), which would be used in relatively small quantities, and in compliance with local and state safety requirements. No construction activities would occur under the No Project Alternative, therefore no use or transport of hazardous materials would occur. For these reasons, the No Project Alternative would have a reduced impact compared to the proposed Project.

i. *Hydrology and Water Quality.* The DEIR analysis concluded the project's hydrology and water quality impacts would be less than significant. The Project would not violate any water quality standards or waste discharge requirements, degrade surface or ground water quality, decrease groundwater supplies or recharge capabilities, or alter drainage patterns of the site or area. In addition, the Project was found not to risk the release of pollutants due to project inundation or conflict with the implementation of water quality or

groundwater management plans. Under the No Project Alternative, no construction activities would occur, therefore the No Project Alternative would have a reduced impact compared to the proposed Project.

j. *Land Use and Planning.* The DEIR analysis found that the Project's impacts to Land Use would be less than significant. The Project would not physically divide an established community or 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 effect. As with the Project, the No Project Alternative would not physically divide an established community. The No Project Alternative would have fewer potential land use conflicts than the proposed Project because it would result in no construction of any seawall and no short-term construction impacts to the surrounding community.

k. *Noise.* The Project would generate noise and vibration during construction. The DEIR found that the Project's impacts related to noise would be short term and less than significant with the implementation of noise control mitigation measures as noted in Mitigation Measures NOI-1A through NOI-1G and Mitigation Measures NOI-2A and NOI-2B. Vibration impacts were found to be less than significant. Because the No Project Alternative would not result in any construction, it would not generate any construction noise and thus would have a reduced noise impact compared to the proposed Project.

l. *Public Services and Recreation.* The DEIR found that the Project would have less than significant impacts to Public Services and Recreation. By protecting the existing bluff face from further erosion, the proposed seawall would help to preserve recreational uses of the beach below. In addition, the Project would provide opportunities for passive recreation on the blufftop by restoring this area and installing a pedestrian path and benches. Under the No Project Alternative, the bluff would continue to erode, jeopardizing recreational uses of the beach below, and the blufftop would not be restored, providing no additional recreational opportunities for the community. For these reasons, the No Project Alternative could potentially have a greater Public Services and Recreation impact compared to the proposed Project.

m. *Transportation.* The DEIR found that the Project would have less than significant impacts to Transportation. The Project would not generate traffic over the long term or cause any changes to the circulation system during construction. Flaggers and/or other traffic control measures such as signage would be utilized during construction to ensure the safe transport of construction equipment and materials to and from the project site. With the exception of flaggers and traffic controls, the impacts to Transportation under the No Project Alternative would be similar compared to the Project.

n. *Utilities Systems*. The DEIR found that no utility connections are required to operate the Project and there would be no need to connect to utility infrastructure such as water, sewer, stormwater, electrical, natural gas or telecommunications utilities. Therefore, the Project would have no impact on utilities and would not require relocation of existing utilities. Because it is considered a short-term construction project, it would not generate a

significant demand for water or wastewater treatment, and construction waste would be expected to be minimal and not exceed the capacity of the landfill that serves the area. The Project would therefore have no impact on utilities, require relocation of existing utilities, generate a significant demand for water or wastewater treatment, generate solid waste in excess of State or local standards or the capacity of local infrastructure, and would not conflict with any federal, state or local statutes and regulations related to solid waste. Similarly, the No Project Alternative, which proposes no construction, would result in no impact to Utilities Systems.

6.2.2 Alternative 2: Grading of the Bluff

Principal Characteristics

Local coastal bluffs are approximately 75 to 85 feet in height with bluff face inclinations ranging from 70 to 85 degrees. As of 2017, the top of bluff is located approximately 70 to 80 feet from the top of curb adjoining Esplanade Avenue. Local bluffs are composed of marine terrace deposits that are poorly to moderately cemented and highly susceptible to erosion from wave attack. Local long term average erosion rates (bluff retreat) have been calculated at approximately 2½ feet per year; however, it is not unusual to lose 15 or more feet of bluff during a single adverse El Nino winter season.17 This Alternative would propose to grade the top of the bluffs so that the resulting inclination would be 45 to 50 degrees and otherwise would not propose or implement any other components of the proposed Project.

Finding for Alternative 2: Grading of the Bluff

The Grading of the Bluff Alternative would meet two of the three primary project objectives identified in Chapter 3.2 Project Objectives. It would be consistent with Objectives #2 and #3, which seek to minimize impacts to sensitive resources and provide public access to ocean views from Esplanade Avenue (except where public access would endanger public safety or fragile coastal resources), respectively. This Alternative would not, however, be completely consistent with Objective #1 because it would do nothing to halt erosion at the toe of the bluff. As described in Subsection f. Geology and Soils, above, this Alternative would not provide needed protection of the public roadway and utility infrastructure, and due to surrounding private property, bluff retreat and the loss of the public road would likely result in no public access to the bluff overlook.

Rationale

The impacts of the Grading of the Bluff Alternative are examined qualitatively to allow comparison with the Project. The City does not contain agricultural, forestry, or mineral resources, and is not located in a Very High Fire Hazard Severity zone and does not represent features that would substantially alter the wildfire risk in the area. The Project also does not involve Population and Housing-related issues. Therefore, these topics are not discussed below. They are discussed in Chapter 6 - CEQA Mandated Section of this EIR.

a. *Aesthetics.* The DEIR analysis found the aesthetic impacts of the infrastructure preservation Project to be less than significant. The Project would not have a substantial adverse effect on a scenic vista, damage scenic resources within a state designated

highway, conflict with applicable zoning or other city regulations governing scenic quality or create a new source of light and glare.

Under the Grading of the Bluff Alternative, views from these areas would be altered by the proposed grading, which would reduce the width of the blufftop between the edge of the bluff and Esplanade Avenue. No revegetation of the graded blufftop is proposed with this Alternative. Grading the blufftop under this Alternative would also result in alteration of the existing views of the bluff from the beach. There would be no riprap removal and no seawall construction and the area closer to the top of the bluff would be graded to a slope of approximately 45-50 degrees, which would result in a noticeably gentler slope than the current condition. While this Alternative would initially result in changes to existing views from above and below the bluff, the changes would be temporary, and would not obstruct views of the ocean or coastline from these areas. The Grading of the Bluff Alternative would therefore have a similar impact compared to the proposed Project.

b. *Air Quality.* The DEIR analysis found the impacts of the infrastructure preservation Project to be less than significant. Potential impacts were related to short-term construction vehicle emissions of criteria pollutants and fugitive dust emissions. The Grading of the Bluff Alternative would result in grading of the blufftop, but no seawall construction activities on the beach. There would be no excavation, sheet pile driving, or shotcrete application work involved, however, the grading required by this Alternative would generate criterial air pollutant emissions as well as fugitive dust emissions from the grading activity itself, and in addition from the haul trucks that would be required to export the soil materials from the site. Some amount of grading activity on the blufftop would be required under the Project in order to facilitate the proposed habitat restoration plan, so there could potentially be some offset in the criteria air pollutant and fugitive dust emission generation with the implementation of this Alternative, but overall, the Grading of the Bluff Alternative would have greater air quality impacts compared to the Project.

c. *Biological Resources.* The DEIR found impacts to biological resources to be potentially significant under Impact BIO-1. However, implementation of Mitigation Measures BIO-1a through BIO-1c would reduce the Project's potentially significant impacts to less than significant. Because it proposes no revegetation/habitat restoration on the blufftop and could result in the loss of potential cliff nesting habitat, the Grading of the Bluff Alternative could potentially have a greater, although still less than significant biological resources impact compared to the Project. As described in Subsection f. Geology and Soils, below, habitat restoration goals of the bluff may not be achievable due to unstable geomorphological conditions resulting from this Alternative.

d. *Cultural Resources and Tribal Cultural Resources.* The DEIR analysis concluded the Project would have a less than significant impact related to Cultural Resources and Tribal Cultural Resources. Although it is not likely that there are archaeological remains or artifacts within the Project site due to its location on the beach and prior ground disturbing activities that occurred during construction of the existing buildings on the top of the bluff, the possibility exists that buried archaeological and historical resources, including tribal

cultural resources could be discovered during construction of the Project. The Project therefore includes Best Management Practices that construction contractors would be required to follow that would ensure the protection and proper treatment of such resources. Under the Grading of the Bluff Alternative, construction activities that could potentially impact buried archaeological and historical resources would be limited to grading on the blufftop. Thus, the Grading of the Bluff Alternative is considered to have a reduced level of impact to Cultural Resources and Tribal Cultural Resources compared to the Project, which would also include construction activities on the beach.

e. *Energy.* The DEIR analysis concluded that the Project would not result in operational uses that would increase energy consumption and therefore would not result in a potentially significant environmental effect due to wasteful, inefficient, or unnecessary consumption of energy resources. In addition, as the proposed Project involves the construction of a seawall for coastal bluff fortification and would not increase energy consumption over the long term and would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. The Grading of the Bluff Alternative would result in less construction activity and therefore less energy consumption than the Project, and would similarly not result in a potentially significant environmental effect due to wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency.

f. *Geology and Soils.* The DEIR analysis found the Geology and Soils impacts of the proposed Project to be less than significant. The geotechnical investigation prepared for the Project determined that if the base of the bluff is adequately protected with a seawall as proposed, the unsupported portion of the bluff above the seawall would continue to experience raveling and erosion/bluff retreat until ultimately achieving equilibrium at a relatively stable static inclination of approximately 40 to 50 degrees. The Geotechnical Report (Cotton Shires 2019, Appendix B) also concluded that the bluffs would be relatively stable under static conditions if graded at 45 to 50 degrees as proposed under the Grading of the Bluff Alternative. However, due to the highly erodible nature of the bluff materials at both the face and toe of the bluff, erosion would result from direct rainfall and wave run-up. Face and toe erosion would cause retreat of the bluff crest and ultimately result in undermining of the street and loss of infrastructure under this Alternative. Furthermore, a 45-degree slope projected up from the toe of the bluff on the beach would place the top of the graded slope within 10 to 20 feet laterally from the edge of the street at some locations. This approach would reduce failure of blocks/slabs of bluff material onto the beach below but would not provide needed protection of the public roadway and utility infrastructure. Due to surrounding private property, bluff retreat and the loss of the public road would likely result in no public access to the bluff overlook. Additionally, habitat restoration goals of the bluff may not be achievable due to unstable geomorphological conditions. The Grading of the Bluff Alternative would therefore have greater Geology and Soils impacts compared to the Project.

g. *Greenhouse Gas Emissions.* The DEIR analysis found that the Project's impacts to Greenhouse Gas Emissions would be less than significant. Under the Grading of the Bluff Alternative there would be fewer sources of greenhouse gas emissions, as the amount of diesel-powered grading equipment required would likely be less than the amount of diesel-powered equipment required for the Project, in addition to fewer truck trips. The Grading of the Bluff Alternative would therefore result in reduced Greenhouse Gas Emission impacts compared to the proposed Project.

h. *Hazards and Hazardous Materials.* The DEIR analysis found that the Project's impacts to Hazards and Hazardous Materials would be less than significant. Construction of the Project would involve the use of hazardous materials (fuels, oils and other vehicle-related products), which would be used in relatively small quantities, and in compliance with local and state safety requirements. Under the Grading of the Bluff Alternative there would be a reduced number of construction activities, therefore the use or transport of hazardous materials would be less than it would be under the Project. For this reason, the Grading of the Bluff Alternative would have a reduced impact compared to the Project.

i. *Hydrology and Water Quality*. The DEIR analysis concluded the Project's hydrology and water quality impacts would be less than significant. The Project would not violate any water quality standards or waste discharge requirements, degrade surface or ground water quality, decrease groundwater supplies or recharge capabilities, or alter drainage patterns of the site or area. In addition, the Project was found not to risk the release of pollutants due to project inundation or conflict with the implementation of water quality or groundwater management plans. Under the Grading of the Bluff Alternative, the amount of construction activities would be limited to grading on top of the bluff. The analysis of potential erosion impacts contained in the Geology and Soils section of the Draft EIR found that following final grading on the top of the bluff resulting in uniformly graded lots that drain towards Esplanade Avenue, the potential for runoff from the lots to adversely impact the bluff face would be low. The Grading of the Bluff Alternative would therefore have a reduced impact compared to the proposed Project.

j. *Land Use and Planning*. The DEIR analysis found that the Project's impacts to Land Use would be less than significant. The Project would not physically divide an established community or 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 effect. As with the Project, the Grading of the Bluff Alternative would not physically divide an established community. It would have fewer potential land use conflicts than the Project because it would result in no construction activities on the beach and less construction activities overall. The Grading of the Bluff Alternative would therefore have a lesser Land Use impact compared to the Project.

k. *Noise.* The Project would generate noise and vibration during construction. The DEIR found that the Project's impacts related to noise would be short term and less than significant with the implementation of noise control mitigation measures as noted in Mitigation Measures NOI-1a through NOI-1d. Vibration impacts were found to be less

than significant. Because the Grading of the Bluff Alternative would presumably be subject to the same noise mitigation requirements and would result in less construction activity, including no pile driving, and would therefore generate less construction noise, it would have a reduced noise impact compared to the proposed Project.

l. *Public Services and Recreation*. The DEIR found that the Project would have less than significant impacts to Public Services and Recreation. By protecting the existing bluff face from further erosion, the proposed seawall would help to preserve recreational uses of the beach below. In addition, the Project would provide opportunities for passive recreation on the blufftop by restoring this area and installing a pedestrian path and benches. For the reasons explained in Subsection f. Geology and Soils, above, the Grading of the Bluff Alternative would likely result in no public access to the bluff overlook. For this reason, the Grading of the Bluff Alternative would have a greater Public Services and Recreation impact compared to the proposed Project.

m. *Transportation.* The DEIR found that the Project would have less than significant impacts to Transportation. The Project would not generate traffic over the long term or cause any changes to the circulation system during construction. Flaggers and/or other traffic control measures such as signage would be utilized during construction to ensure the safe transport of construction equipment and materials to and from the project site. The Grading of the Bluff Alternative would similarly not result in long term traffic or impacts to the circulation system during the proposed grading activities, and traffic controls would be implemented to ensure safety. The number of truck trips would likely increase under this Alternative, as the proposed grading would result in off-haul trips not required under the project scenario, however, the temporary nature of these increased trips would result in a less than significant impact. The Transportation impacts under the Grading of the Bluff Alternative would be similar or slightly greater compared to the Project.

n. *Utilities Systems.* The DEIR found that no utility connections are required to operate the proposed seawall and would not connect to utility infrastructure such as water, sewer, stormwater, electrical, natural gas or telecommunications utilities. Therefore, the Project would have no impact on utilities or require relocation of existing utilities. Because it is considered a short-term construction project, it would not generate a significant demand for water or wastewater treatment, and construction waste would be expected to be minimal and not exceed the capacity of the landfill that serves the area. The Project would therefore have no impact on utilities, require relocation of existing utilities, generate a significant demand for water or wastewater treatment, generate solid waste in excess of State or local standards or the capacity of local infrastructure, and would not conflict with any federal, state or local statutes and regulations related to solid waste. Similarly, the Grading of the Bluff Alternative, which proposes less construction than the Project, would result in no impact to Utilities Systems.

6.2.3 Alternative 3: Sand Replenishment

Principal Characteristics

Sand Replenishment (also known as beach nourishment) is a process by which sediment, usually sand, lost through longshore drift or erosion is replaced from other sources. A wider beach can reduce storm damage to coastal structures by dissipating energy across the surf zone, protecting upland structures and infrastructure from storm surges, tsunamis and unusually high tides. It is typically a repetitive and limitless process since it does not remove the physical forces that cause erosion but simply mitigates their effects.18 It is characterized as a soft protection strategy that relies on a sandy beach of sufficient width to provide a buffer against seasonal and storm related erosion and flooding. This alternative would require repeated application of sand to the beach to protect the bluff from wave action. It would require regular beach access for heavy equipment (trucks carrying sand). This alternative does not include any of the other components of the proposed Project such as the seawall, staging areas, or restoration of the blufftop.

Replenishing sand at the base of the bluff could potentially prevent continued wave erosion of the toe of the bluff. However, sand is rapidly removed from the beach under winter storm conditions at the project location and maintenance of an adequate beach to prevent wave run-up from reaching the toe of bluff under high tide and high swell conditions (combined with future sea level rise) would likely not be sustainable. Sand replenishment will also not provide similar lateral support to the bluff that would result from using a structural approach. Furthermore, sufficient understanding about the local sand transport directions and rates are not currently available to estimate the volume of sand required. The probable long term economic commitment may not be sustainable for the City and regular access by construction equipment would potentially result in long-term impacts to bluff and beach habitats. Furthermore, finding a constant and lasting source of sand suitable for this area would very challenging. The bluffs would likely continue to retreat and would pose a threat to the public roadway and utility infrastructure, as well as pose a safety hazard for the public due to bluff material falling on the beach. Additionally, habitat restoration goals for the bluff may not be achievable due to unstable geomorphological conditions.

Finding for Alternative 3: Sand Replenishment

The Sand Replenishment Alternative would meet the first primary project objective as it would, if properly implemented, halt bluff toe erosion toward Esplanade Avenue and prevent the collapse of its critical infrastructure for some period of time. However, whether or not it would be effective for at least 30 years would depend upon the availability of the supply of the proper type of beach sand over that period of time and the City's ability to continuously implement its delivery and application. In addition, as stated previously, this Alternative would not provide similar lateral support to the bluff that would result from using a structural approach. This Alternative would also not necessarily meet the second objective, as the regular ongoing delivery of sand to the beach would involve the use of large trucks, whose presence on the beach could potentially negatively impact sensitive resources such as bluff and beach habitats and shoreline aesthetics. This Alternative would meet the third objective, which is to provide public access to ocean views from

Esplanade Avenue, except where public access would endanger public safety or fragile coastal resources.

For the reasons described above, the Sand Replenishment Alternative would not be consistent with Objectives #1 and #2 which seek a design solution that protects Esplanade Avenue from further bluff erosion and risk to critical infrastructure, and to protect sensitive resources including beach and bluff habitats and shoreline aesthetics.

Rationale

The impacts of the San Replenishment Alternative are examined qualitatively to allow comparison with the Project. The City does not contain agricultural, forestry, or mineral resources, and is not located in a Very High Fire Hazard Severity zone and does not represent features that would substantially alter the wildfire risk in the area. The Project also does not involve Population and Housing-related issues. Therefore, these topics are not discussed below. They are discussed in Chapter 6 CEQA Mandated Section of this EIR.

a. *Aesthetics.* The DEIR analysis found the aesthetic impacts of the infrastructure preservation Project to be less than significant. The proposed Project would not impact a scenic vista, damage scenic resources within a state designated highway, conflict with applicable zoning or other city regulations governing scenic quality, or create a new source of light and glare. Although no significant impact would result, the analysis notes that temporary nighttime lighting during the construction period could occur on the blufftop areas where construction equipment is staged.

   The Sand Replenishment Alternative could potentially result in scenic impacts because it would require that heavy equipment (haul trucks) repeatedly be used to bring sand to the beach, interrupting views of the coastline from the surrounding beaches and from areas above the beach. These construction impacts would be temporary, similar to the Project, however, sand replenishment requires an indefinite number of repeated deliveries and application of sand and would likely result in longer lasting visual impacts than construction of the Project. This alternative would have a greater aesthetic impact than the Project, but still less than significant.

b. *Air Quality.* The DEIR analysis found the impacts of the infrastructure preservation Project to be less than significant. Potential impacts were related to short-term construction vehicle emissions of criteria pollutants and fugitive dust emissions. The Sand Replenishment Alternative would also result in construction vehicle emissions of criteria pollutants and fugitive dust emissions, however using different types of construction equipment. No pile driving equipment or equipment for shotcrete application would be used for the sand replenishment operations, for example. Vehicles used for the delivery and application of the sand on the beach such as haul trucks and bulldozers would be used for sand replenishment. The duration of the sand replenishment operations is unknown, therefore the overall quantity of emissions of criteria pollutants or fugitive dust compared to the Project cannot be determined. This alternative could potentially have a greater air quality impact than the Project.

c. *Biological Resources.* The DEIR analysis found the impacts of the infrastructure preservation Project on biological resources to be potentially significant under Impact BIO-1. However, implementation of Mitigation Measures BIO-1 and BIO-2 would reduce the Project's potentially significant impacts to less than significant. As described in Section 4.3 Biological Resources, the intertidal habitat zone includes the sandy beach and riprap (rocky) habitats that are subject to periodic tidal inundation. There are numerous species of shorebirds that may forage in the intertidal zone, and variety of invertebrate species live in the sand and in the decaying seaweed and other detritus on the sand surface. The Sand Replenishment Alternative would extend the width of the beach towards the water, which could have the effect of shorebirds, invertebrates and other wildlife species moving away from their established habitats. That disruption may continue with ongoing wave pattern changes or other changing shore life patterns which occur. In addition, regular access by construction equipment would potentially result in long-term impacts to bluff and beach habitats. The Sand Replenishment Alternative also proposes no revegetation/habitat restoration on the blufftop. For these reasons, the Sand Replenishment Alternative could potentially have a greater Biological Resource impacts compared to the Project.

d. *Cultural Resources and Tribal Cultural Resources*. The DEIR analysis concluded the Project would have a less than significant impact related to Cultural Resources and Tribal Cultural Resources. Although it is not likely that there are archaeological remains or artifacts within the project site due to its location on the beach and prior ground disturbing activities that occurred during construction of the existing buildings on the top of the bluff, the possibility exists that buried archaeological and historical resources, including tribal cultural resources could be discovered during construction of the Project. The Project therefore includes Best Management Practices that construction contractors would be required to follow that would ensure the protection and proper treatment of such resources. Under the Sand Replenishment Alternative, there would be no construction activities that could potentially impact buried archaeological and historical resources, including tribal cultural resources. Thus, the Sand Replenishment Alternative is considered to have a reduced level of impact compared to the Project.

e. *Energy*. The DEIR analysis concluded that the Project would not result in operational uses that would increase energy consumption and therefore would not result in a potentially significant environmental effect due to wasteful, inefficient, or unnecessary consumption of energy resources. In addition, as the proposed Project involves the construction of a seawall for coastal bluff fortification and would not increase energy consumption over the long term and would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. The Sand Replenishment Alternative could potentially result in more energy consumption than the Project due to an unforeseen number of additional future truck trips to continuously supply sand to the beach. However, because the number of truck trips is unknown, it would not be considered to be a significant environmental effect due to wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local

plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. The impact would be less than significant.

f. *Geology and Soils*. The DEIR analysis found that the Project's Geology and Soils impacts would be less than significant. Under the Sand Replenishment Alternative there would be no construction of structures, and therefore impacts related to seismic conditions (faults, liquefaction, ground failure), soil erosion, landslides and expansive soils would be irrelevant. The Sand Replenishment Alternative would result in lesser Geology and Soils impacts than the Project.

g. *Greenhouse Gas Emissions*. The DEIR analysis found that the Project's impacts to Greenhouse Gas Emissions would be less than significant. Under the Sand Replenishment Alternative there would be an undetermined number of truck trips that would generate gas-generating emissions. This would likely result in greater emissions impacts than the Project, which would only generate greenhouse gas emissions during the short-term of the construction period. The Sand replenishment Alternative would therefore result in greater Greenhouse Gas Emission impacts compared to the proposed Project.

h. *Hazards and Hazardous Materials*. The DEIR analysis found that the Project's impacts to Hazards and Hazardous Materials would be less than significant. Construction of the Project would involve the use of hazardous materials (fuels, oils and other vehicle-related products), which would be used in relatively small quantities, and in compliance with local and state safety requirements. No construction activities would occur under the Sand Replenishment Alternative, therefore no use or transport of hazardous materials would occur. For these reasons, the Sand Replenishment Alternative would have a reduced impact compared to the proposed Project. Assuming that the bluff would continue to retreat under the Sand Replenishment Alternative, this would represent a public safety hazard due to bluff material falling on the beach, as it currently does. The impacts of this Alternative with respect to safety hazards would therefore be greater compared to the proposed Project.

i. *Hydrology and Water Quality*. The DEIR analysis concluded the Project's hydrology and water quality impacts would be less than significant. The Project would not violate any water quality standards or waste discharge requirements, degrade surface or ground water quality, decrease groundwater supplies or recharge capabilities, or alter drainage patterns of the site or area. In addition, the Project was found not to risk the release of pollutants due to project inundation or conflict with the implementation of water quality or groundwater management plans. Under the Sand Replenishment Alternative, no construction activities would occur, therefore it would have a reduced construction impact compared to the proposed Project. However, there would also be no grading or recontouring of the blufftop to direct stormwater runoff to the street. Therefore, this Alternative could result in greater impacts than the proposed project related to on-site or off-site erosion, siltation or flooding. Overall, when considering the reduced construction

-related impacts and the potentially greater runoff impacts, the Sand Replenishment Alternative would have a similar impacts to Hydrology and Water Quality compared to the proposed Project.

j. *Land Use and Planning.* The DEIR analysis found that the Project's impacts to Land Use would be less than significant. The Project would not physically divide an established community or 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 effect. As with the Project, the Sand Replenishment Alternative would not physically divide an established community, however it could potentially impact the use of the beach as a recreational site for the community through the presence of haul trucks and maintenance activities on an ongoing basis. Construction activities associated with the proposed Project would be temporary. The Sand Replenishment Alternative would therefore have a greater Land Use impact than the proposed Project.

k. *Noise.* The Project would generate noise and vibration during construction. The DEIR found that the Project's impacts related to noise would be short term and less than significant with the implementation of noise control mitigation measures as noted in Mitigation Measures NOI-1a through NOI-1d. Vibration impacts were found to be less than significant. Because the Sand Replenishment Alternative would not result in any construction, and noise generated would be limited to haul truck traffic, it would have a reduced noise impact compared to the proposed Project.

l. *Public Services and Recreation.* The DEIR analysis found that the Project would have less than significant impacts to Public Services and Recreation. By protecting the existing bluff face from further erosion, the proposed seawall would help to preserve recreational uses of the beach below. In addition, the Project would provide opportunities for passive recreation on the blufftop by restoring this area and installing a pedestrian path and benches. Under the Sand Replenishment Alternative, erosion of the bluff would likely be reduced, and the increased width of the beach created by the additional regular sand deposition would retain and possibly enhance the existing recreational uses of the beach below. Under this Alternative the blufftop would not be restored, however, providing no additional recreational opportunities for the community in this area. For these reasons, the Sand Replenishment Alternative would have a similar less than significant Recreation impact compared to the proposed Project.

m. *Transportation.* The DEIR analysis found that the Project would have less than significant impacts to Transportation. The Project would not generate traffic over the long term or cause any changes to the circulation system during construction. Flaggers and/or other traffic control measures such as signage would be utilized during construction to ensure the safe transport of construction equipment and materials to and from the Project site. Traffic controls would also likely be used under the Sand Replenishment Alternative, however, unlike the proposed Project, the Sand Replenishment Alternative could potentially result in long term traffic or impacts to the circulation system due to an

indefinite number of haul truck trips accessing the beach. The Transportation impacts under the Sand Replenishment Alternative would therefore be greater compared to the Project.

n. *Utilities Systems.* The DEIR found that no utility connections are required to operate the proposed seawall and would not connect to utility infrastructure such as water, sewer, stormwater, electrical, natural gas or telecommunications utilities. Therefore, the Project would have no impact on utilities or require relocation of existing utilities. Because it is considered a short-term construction project, it would not generate a significant demand for water or wastewater treatment, and construction waste would be expected to be minimal and not exceed the capacity of the landfill that serves the area. The Project would therefore have no impact on utilities, require relocation of existing utilities, generate a significant demand for water or wastewater treatment, generate solid waste in excess of State or local standards or the capacity of local infrastructure, and would not conflict with any federal, state or local statutes and regulations related to solid waste. Similarly, the Sand Replenishment Alternative, which proposes the importation of sand to the beach, would result in no impact to Utilities Systems.

6.2.4 Alternative 4: Rock Revetment

Principal Characteristics

The Rock Revetment Alternative would consist of placing buried and exposed sloping layers of large rock against the toe of the bluff at the back of the beach for the purpose of preventing bluff erosion. The rock materials used would be durable large armor stone that is similar to but bigger than the existing riprap currently located along the base of the bluff. The size of the stones would be variable but would be selected to create a stable armor layer above and below the beach to absorb and dissipate the energy of waves in order to reduce erosion of the bluff and limit scour and undermining of the revetment.

Finding for Alternative 4: Rock Revetment

The Rock Revetment Alternative would only meet one of the three primary project objectives. Although it would be a bluff protective structure designed to halt bluff erosion toward Esplanade Avenue and its critical infrastructure to prevent collapse due to bluff erosion (Objective #1), the rock revetment would not include near-surface keyway material that is resistant to erosion and undermining, such as bedrock, and would therefore be susceptible to undermining, and rock migration, both of which would leave the bluff unprotected and open to wave scour. It would result in potential impacts to shoreline aesthetics, given the amount of additional rock riprap that would be placed on the beach (Objective #2). The Rock Revetment Alternative would not restrict or impair public access to ocean views from Esplanade Avenue (Objective #3).

Rationale

The impacts of the Rock Revetment Alternative are examined qualitatively to allow comparison with the Project. The City does not contain agricultural, forestry, or mineral resources, and is not located in a Very High Fire Hazard Severity zone and does not represent features that would substantially alter the wildfire risk in the area. The Project also does not involve Population and

Housing-related issues. Therefore, these topics are not discussed below. They are discussed in Chapter 6 - CEQA Mandated Section of this EIR.

a. *Aesthetics.* The DEIR analysis found the aesthetic impacts of the infrastructure preservation Project to be less than significant. The Project would not impact a scenic vista, damage scenic resources within a state designated highway, conflict with applicable zoning or other city regulations governing scenic quality or create a new source of light and glare. Although no significant impact would result, the analysis notes that temporary nighttime lighting during the construction period could occur on the blufftop areas where construction equipment is staged. As with the Project, the Rock Revetment Alternative would not impact a scenic vista, damage scenic resources within a state designated highway, conflict with applicable zoning or other city regulations governing scenic quality or create a new source of light and glare. However, the placement of a large amount of additional rock at the toe of the bluff would negatively impact the scenic resources of the beach and coastline; more so than the proposed seawall, which would visually blend into the bluff. The Rock Revetment Alternative would result in greater Aesthetic impacts compared to the proposed Project.

b. *Air Quality.* The DEIR analysis found the impacts of the infrastructure preservation Project to be less than significant. Potential impacts were related to short-term construction vehicle emissions of criteria pollutants and fugitive dust emissions. The Rock Revetment Alterative would involve the use of heavy equipment to move and place a substantial amount of riprap on the beach, requiring more truck trips (to haul the rock) than would be expected under the project conditions, and would therefore result in more short-term emissions of criteria pollutants than would be expected for the Project. Fugitive dust emissions would likely be greater than for the Project, as well. The Rock Revetment Alternative would result in greater Air Quality impacts compared to the proposed Project.

c. *Biological Resources.* The DEIR analysis found the impacts of the infrastructure preservation Project on biological resources to be potentially significant under Impact BIO-1. However, implementation of Mitigation Measure BIO-1a though BIO-1c would reduce the Project's potentially significant impacts to less than significant. Under the Rock Revetment Alternative, the proposed construction on the beach could potentially impact nesting birds and allow the introduction of invasive species, just as with the proposed Project, and would be required to implement the same mitigation measures as the Project to reduce impacts to a less than significant level. However, because it proposes no revegetation/habitat restoration on the blufftop, the Rock Revetment Alternative would have a greater Biological Resources impact compared to the proposed Project.

d. *Cultural Resources and Tribal Cultural Resources*. The DEIR analysis concluded the Project would have a less than significant impact related to Cultural Resources and Tribal Cultural Resources. Although it is not likely that there are archaeological remains or artifacts within the project site due to its location on the beach and prior ground disturbing activities that occurred during construction of the existing buildings on the top of the bluff, the possibility exists that buried archaeological and historical resources, including tribal

cultural resources could be discovered during construction of the Project. The Project therefore includes Best Management Practices that construction contractors would be required to follow that would ensure the protection and proper treatment of such resources. Under the Rock Revetment Alternative, there would be construction activities that could potentially impact buried archaeological and historical resources at the beach, including tribal cultural resources. Thus, the Rock Revetment Alternative would have a similar level of impact to Cultural Resources and tribal Cultural Resources compared to the Project.

e. *Energy.* The Project would not result in operational uses that would significantly increase energy consumption. Project construction would require the use of construction equipment and construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. Because the amounts of energy consumed would be relatively minor, the DEIR concluded that the Project would have a less than significant impact to Energy, as it would not generate energy usage that may have a significant impact on the environment, would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases, and would not cause substantial adverse cumulative impacts with respect to energy usage. The Rock Revetment Alternative would involve the use of construction equipment and construction-related vehicle trips similar to the proposed Project and would therefore result in similar Energy impacts compared to the proposed Project.

f. *Geology and Soils.* The DEIR analysis found that the Project's Geology and Soils impacts would be less than significant. Under the Rock Revetment Alternative there would also be construction activities on the beach, but those activities under this alternative would occupy a larger area than the proposed project. It would therefore result in similar or slightly greater Geology and Soils impacts compared to the proposed Project.

g. *Greenhouse Gas Emissions.* The DEIR analysis found that the Project's impacts to Greenhouse Gas Emissions would be less than significant. Under the Rock Revetment Alternative there would also be construction activities involving the use of greenhouse gas-generating emissions. The Rock Revetment Alternative would therefore result in similar Greenhouse Gas Emission impacts compared to the proposed Project.

h. *Hazards and Hazardous Materials*. The DEIR analysis found that the Project's impacts to Hazards and Hazardous Materials would be less than significant. Construction of the Project would involve the use of hazardous materials (fuels, oils and other vehicle-related products), which would be used in relatively small quantities, and in compliance with local and state safety requirements. Waste management and materials pollution control BMPs would also be implemented as required at the construction site. The Rock Revetment Alternative would also involve the use of construction vehicles, and waste management and materials pollution control BMPs would also be implemented. Therefore, the Rock Revetment Alternative would result in similar Hazards and Hazardous Materials impacts compared to the proposed Project.

i. *Hydrology and Water Quality.* The DEIR analysis concluded the Project's hydrology and water quality impacts would be less than significant. The Project would not violate any water quality standards or waste discharge requirements, degrade surface or ground water quality, decrease groundwater supplies or recharge capabilities, or alter drainage patterns of the site or area. In addition, the Project was found not to risk the release of pollutants due to project inundation or conflict with the implementation of water quality or groundwater management plans. The Project includes BMPs to minimize erosion, impacts to water quality, and impacts to special-status species. Under the Rock Revetment Alternative, construction activities would occur on the beach, similar to the proposed Project, and construction would be subject to the same BMPs as the proposed Project. However, under the Rock Revetment Alternative there would be no grading or recontouring of the blufftop to direct stormwater runoff to the street. Therefore, this Alternative could result in greater impacts than the proposed Project related to on-site or off-site erosion, siltation or flooding. The Rock Revetment Alternative would have a greater impact to Hydrology and Water Quality compared to the proposed Project.

j. *Land Use and Planning*. The DEIR analysis found that the Project's impacts to Land Use would be less than significant. The Project would not physically divide an established community or 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 effect. As with the Project, the Rock Revetment Alternative would not physically divide an established community. It would temporarily impact the use of the beach as a recreational site for the community, as the beach would have to be closed during construction of the revetment. As with the proposed Project, the construction activities would be temporary. The Rock Revetment Alternative would therefore have a similar Land Use impact compared to the proposed Project.

k. *Noise.* The Project would generate noise and vibration during construction. The DEIR found that the Project's impacts related to noise would be short term and less than significant with the implementation of noise control mitigation measures as noted in Mitigation Measures NOI-1A through NOI-1G and Mitigation Measures NOI-2A and NOI-2B. Vibration impacts were found to be less than significant. Construction of the Rock Revetment Alternative would involve very noise-intensive activities such as mechanical picking, placing and driving rocks down to the beach with trucks. These activities would also be expected to be short term in nature and therefore result in less than significant noise impacts. The Rock Revetment Alternative would have similar Noise impacts compared to the proposed Project.

l. *Public Services and Recreation*. The DEIR found that the Project would have less than significant impacts to Public Services and Recreation. By protecting the existing bluff face from further erosion, the proposed seawall would help to preserve recreational uses of the beach below. However, the Rock Revetment Alternative would take up more lateral beach space than the proposed Project and thus would allow less beach recreational space than the Project. In addition, the Project would provide opportunities for passive recreation on

the blufftop by restoring this area and installing a pedestrian path and benches. This restoration could occur similarly under this alternative. Because the Rock Revetment Alternative would have a greater impact to existing recreational uses of the beach, it would be considered to have a greater Recreation impact compared to the proposed Project.

m. *Transportation.* The DEIR found that the Project would have less than significant impacts to Transportation. The Project would not generate traffic over the long term or cause any changes to the circulation system during construction. Flaggers and/or other traffic control measures such as signage would be utilized during construction to ensure the safe transport of construction equipment and materials to and from the project site. The Rock Revetment Alternative would require transporting a great amount of rock using large trucks, which could result in impacts on the neighborhood streets from truck stacking and queuing. Although this impact would be less than significant because it would be temporary, it would represent a greater impact than the proposed Project.

n. *Utilities Systems.* The DEIR found that no utility connections are required to operate the proposed seawall and would not connect to utility infrastructure such as water, sewer, stormwater, electrical, natural gas or telecommunications utilities. Therefore, the Project would have no impact on utilities or require relocation of existing utilities. Because it is considered a short-term construction project, it would not generate a significant demand for water or wastewater treatment, and construction waste would be expected to be minimal and not exceed the capacity of the landfill that serves the area. The Project would therefore have no impact on utilities, require relocation of existing utilities, generate a significant demand for water or wastewater treatment, generate solid waste in excess of State or local standards or the capacity of local infrastructure, and would not conflict with any federal, state or local statutes and regulations related to solid waste. Similarly, the Rock Revetment Alternative which proposes the construction of a rock revetment, would result in no impact to Utilities Systems.

CHAPTER 7. STATEMENT OF LOCATION AND CUSTODIAN OF DOCUMENTS

Public Resources Code Section 21081.6(a)(2) requires that the City of Pacifica, as the Lead Agency, specify the location and custodian of the documents of other materials that constitute the record of proceedings upon which its decision has been based. The following location is where review of the record may be performed:

City of Pacifica
Planning Department
540 Crespi Drive
Pacifica, CA 94044

The City has relied on all of the documents contained within the record of proceedings in reaching its decision on the project.