



City of Pacifica

# Redevelopment of the Beach Boulevard Property

Final Environmental Impact Report





# **Redevelopment of the Beach Boulevard Property**

## **Final Environmental Impact Report**

SCH # 2012062070

Prepared for

**City of Pacifica**

Prepared by



July 2013



## I. Introduction

The Draft Program Environmental Impact Report was circulated for a 45-day public review period beginning October 13, 2012 and ending November 26, 2012, as assigned by the State of California Governor's Office of Planning and Research State Clearinghouse and consistent with CEQA regulation. Copies of the document were distributed to state, regional, and local agencies, as well as organizations and individuals, for their review and comment.

This Final Environmental Impact Report, circulated on July 3, 2013, has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This Response to Comments volume, together with the DEIR, technical appendices, and other written documentation prepared during the EIR process, as those documents may be modified by the City Council at the time of certification, will constitute the Final EIR, as defined in the State CEQA Guidelines, Section 15132, and the City of Pacifica's environmental document reporting procedures.

### Document Organization and Framework

This Response to Comments package is organized as follows: Section 1 provides a brief introduction to this report. Section 2 provides a list of agencies and interested persons commenting on the DEIR. This section also contains individual comments followed thereafter by responses. To facilitate review of the responses, an index number (e.g., 1-1, 1-2, 2-1) has been assigned to each comment and to its corresponding responses. Section 3 contains revisions to the Draft EIR as a result of the comments by agencies and interested persons. The responses to comments contained in this package contain material and revisions which will be added or made to the text of the Final EIR.

City staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires a second recirculation period for further public comment under CEQA Guideline Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase

in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

### **CEQA Requirements Regarding Comments and Responses**

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be, “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated.” Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by those submitting comments. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

## 2. List of Commenters on the Draft Program EIR

This section includes all written responses received on the DEIR and the City's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underline for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the Recirculated Draft EIR during the public review period:

**Table 2-1: List of Written Comments Received on the Draft General Plan EIR**

Comment Letter No.	Commenting Person/Agency	Date of Comment
1	CA Department of Transportation (Caltrans)	November 26, 2012
2	CA Coastal Commission	December 3, 2012

**Response to Comment Letter #1 from Mr. Erik Alm, CA Department of Transportation, dated November 26, 2012**

**Response to Comment I-1 – Trip Generation**

Intersection #6 (Palmetto Avenue / Montecito Avenue) does not capture all inbound and outbound trips to the project site. The project trip assignment includes trips to/from the south which will travel on Beach Boulevard (one-way south) and on the new east/west project access road through the center of the site. The analysis assumed that trips to/from the south will not travel through Intersection #6.

**Response to Comment I-2 – Transportation Permit**

Comment noted regarding application for a transportation permit.



## **Response to Comment Letter #2 from Ms. Karen Geisler, CA Coastal Commission, dated December 3, 2012**

### **Response to Comment 2-1 — LCP Amendments**

Comment noted regarding the LCP amendment process.

With regard to the discussion regarding visual impacts, please see Response to Comment 2-3, below.

With regard to comments on the project's consistency with the referenced policy documents, please see [Table 3.7-1: City of Pacifica General Plan Consistency Analysis](#) and [Table 3.7-2: City of Pacifica Local Coastal Land use Plan and CA Coastal Act Consistency Analysis](#).

### **Response to Comment 2-2 — Public Benefit**

The 3.5 acre, publicly-owned project site is the former location of the Sharp Park Waste Water Treatment Plan (SPWWTP). When the Calera Creek Water Recycling Plant was completed in 2000, the SPWWTP was demolished. A majority of the site has been cleared, but there are four buildings that remain on site. All of the buildings are proposed to be removed with the exception of the City of Pacifica pump station (8,100 sf.) located along the northern edge of the property. At present, the project site is currently walled and is inaccessible to the public.

The City of Pacifica has been working for several years to seek a financially viable means to redevelop the project site (which is currently a largely vacant and generally unsightly parcel). Costs that have been incurred and will be incurred by the City in this redevelopment effort include:

- Extensive analysis of contaminated soils conditions and subsequent site clean-up.
- Extensive community outreach regarding preferences for future uses.
- Hiring a consultant (Leland Consulting Group) to prepare a property development evaluation and development program for the site, which considered the market viability and financial feasibility of various development scenarios.
- Planning and coordination with San Mateo County Library to conduct a library needs assessment.
- Complete on-site remediation including demolition of the remaining four (of the five) buildings, removal of the surrounding wall, relocation of utilities, and complete the necessary site clean-up.
- Preparation of the Draft and Final Environmental Impact Report.
- Project entitlements and permitting.

Redevelopment of property, particularly in the City of Pacifica, is a difficult undertaking given its relatively low land valuation as compared to other coastal cities. This is exacerbated by the fact that redevelopment, as a financing tool, is no longer possible in the State of California.

In addition to the considerable costs the City has and will fund as part of this project, there are a significant number of public benefits consistent with the coastal access and use policies as identified in the Coastal Act. These benefits include the following:

1. Construction of a new public library which will include a new public meeting space for the community events and serve as a (much needed) new City Council chambers.
2. Construction of a new, moderately-priced hotel, with ocean views that will serve visitors to Pacifica and will provide direct access to the coastal shoreline.
3. Construction of a new restaurant, open to the public, with ocean views.
4. Expanded coastal access via Pacific Avenue, a new pedestrian- and bike-friendly paseo that will connect Palmetto Avenue (Pacifica's designated main street), to its coastal assets. Combined, these amenities will create a new location to draw visitors and local residents to the coast.
5. Numerous public amenities already exist in the immediate area including the Pacific Ocean, the Pacifica Municipal Pier, the Beach Boulevard Promenade, Mori Point, and Sharp Park Golf Course.
6. Redesigned and improved public parking with direct pedestrian access to the shoreline and the Beach Boulevard Promenade and regional coastal trails.
7. Pedestrian and parking improvements to Montecito and Palmetto Avenues including rebuilt sidewalks, two small plazas (adjacent to the library entrance and on Beach Boulevard), signage, planters and landscaping, and new seating.
8. Reuse of a site that is currently largely inaccessible to the public, and is an eyesore located in the heart of the city's designated main street, Palmetto Avenue. Palmetto Avenue is one Pacifica's cultural hearts, and hosts the city's largest public event, Fog Fest.

In conclusion, the City has made and will continue to make a considerable investment in the project site and is seeking to partner with a developer to help in financing the considerable costs involved in development of the project. There are numerous public benefits associated with the project, as identified above.

Furthermore, the suggestion that “there should be an emphasis on the creation of additional public areas such as a park or open space within the project design” fails to adequately recognize the fact that there is already significant coastal park land directly adjacent to the site and that redevelopment of the project site will enhance and greatly facilitate coastal access by the public to the area by way of public roadways and public uses and services. See also Response to Comment 2-4 – Project Alternatives, Relocation of Open Space Areas.

### **Response to Comment 2-3 — Visual Resources**

The commenter states that the project has the potential to affect the visual character of the immediately surrounding area which would have an impact on coastal views. The commenter requested that visual renderings be provided from “the Highway (1), the beach pier, and from the roads up coast and down coast of the site.”

Firstly, it is important to note that Draft EIR has identified a theoretical project build-out for the project site. The land uses identified represent an estimate of the future uses and a maximum envelope that future development will not exceed. However, ultimate development will likely be less than the building program described in the Draft EIR. Development of the library will be managed directly by the City of Pacifica and San Mateo County. For the remaining portions of the site, the City expects to enter into a negotiated sale (public-private partnership) with one or more private developers, who will then build the residential and commercial (hotel and restaurant) portions of the project per a development and disposition agreement (DDA) or other binding agreement. Based on market conditions and preferences of the private developer, the ultimate development program may be less for any particular land use.

Secondly, there are no specific design plans for the project site. While designs for the library are more progressed, designs for the rest of the project site are conceptual and more programmatic. Subsequent to certification of the Final EIR, the City would permit the project as a part of a Planned Development District. The primary purpose of the P-D District is to allow diversification of the relationships of various buildings, structures and open spaces in planned building groups. In this case, the entire site is being designed to accommodate of unique variety of civic, residential, and commercial land uses, as well as a public plaza extending through the center of the project site. The architectural character of the buildings, streetscape, and open space areas would all be designed as a cohesive set of elements that would be integrated in their form and function and would aesthetically complement each other.

Thirdly, with the exception of the residential buildings, all of the structures would be 35 feet in height and are located on the periphery of the project site, adjacent to existing development. Two of the four residential structures would be located in the interior of the project site and would be a maximum of 45 feet in height. A third 45-foot residential structure would front Palmetto Avenue which is located across the street from existing commercial uses and a surface parking lot. South of this proposed

structure is single-family residential; however, a landscaped buffer, which would include trees, would separate the two structures. The fourth residential structure would be two-to-four townhouses along Birch Lane and would be no taller than 35 feet. Current zoning allows for buildings up to 35 feet in height.

### Visual Simulations

To illustrate the potential visual impacts of the proposed project, three simulations were prepared from public vantage points. Highway I was reviewed as a candidate site for a simulation, however, at its closest point, Highway I is approximately 850 feet east of the project site and views to the project site are blocked by a hill which is generally bisected by Hilton Way. More than a mile north of the project site, the project site is barely visible looking south from Highway I. At this distance, the proposed project would make up a very small fraction of the viewscape and its perceived change from existing conditions would be barely noticeable and very briefly as one is traveling on the highway. As such, a simulation was not included from this vantage point.

As shown in Figures 1 through 4, three public vantage points more proximate to the project site were selected from which simulations were prepared. It is important to note that because no architectural plans have been prepared, these simulations only show building massing (wire frame and opaque volume) and do not include any building details such as articulation, fenestration, variation in color and materials, etc. which would create a more realistic representation of what is intended for the project site. More detailed analysis of the final building designs will be required as part of the Planned Development review process.

#### *Figure 1 – Viewpoint Location Map*

This view shows the viewpoints of the three visual simulations.

#### *Figure 2(a-c) – View Looking West from Montecito Avenue and Palmetto Avenue*

This view illustrates building massing looking west on Palmetto Avenue toward the Pacific Ocean. As seen in this simulation, there would be no significant impact on coastal views. The proposed buildings shown in this view would be no taller than 35 feet, consistent with current zoning requirements. While they would be taller than the two-story apartment buildings (approximately 25 feet in height) on the north side of Palmetto Avenue, the difference is relatively minor and is not considered significantly out of scale, height, or massing such that it would be considered out of character.

Furthermore, the ultimate design of the buildings proposed would be architecturally much better than the expanse of blank walls and flat facades that exists on the two two-story apartment buildings that anchor each corner. And finally, the overhead electrical lines are going to be relocated underground, which would further improve the visual appearance of the streetscape.

*Figure 3(a-c) – View Looking Southeast from End of Pacifica Municipal Pier*

This view illustrates building massing looking east from the Pacifica Municipal Pier southeast toward the project site and hillside development in the background. As seen in this illustration, the building massing of the proposed hotel and restaurant (both no taller than 35 feet) located in the foreground along the shoreline, would be similar in height as the existing City Administration Building on the northwest corner of the project site. This Spanish-style stucco building with terracotta roofing is 32 feet in height.

The proposed two-story library located on the northeast corner will be no taller than 35 feet and is generally similar in scale and height to the adjacent residential apartment buildings. The two main residential buildings will be up to 45 feet in height and located in the interior of the project site.

When viewed in the context of the surrounding urban development, the proposed project will be visually compatible as there are existing built structures along the entire coastline consisting largely of one- and two-story residential structures, similar to the proposed hotel and restaurant. Because the proposed project is situated at the base of the hillside, it would not block views nor diminish with quality of the overall viewscape of the Pacific Ocean from higher elevations. The proposed buildings would not disrupt any ridgeline views and there are no publicly designated scenic viewpoints that would be disrupted.

*Figure 4(a-c) – View Looking North from Sharp Park*

This view illustrates building massing looking north from Sharp Park, south of the project site. Along the shoreline, the proposed hotel and restaurant will be no taller than 35 feet in height, similar to the existing City Administration Building (32 feet) and within the existing zoning height limit.

The proposed townhouses on the southern edge of the project site would also be no taller than 35 feet in height and would be compatible with the existing adjacent residential structures to the south.

The two proposed residential buildings would be taller than the existing surrounding structures (up to 45 feet); however, these proposed buildings would be located within the interior of the lot and away from the street edge.

As seen from this view, the hillsides in the background (to the north and northeast) are already developed with a significant number of single-family residential structures that extend nearly to the top of the ridgeline. As such, the proposed project would not obstruct any scenic natural landscape features, nor would the project disrupt the view of the ridgeline itself.





Source: Google Maps, RBF Consulting (2013)



JN 70-100421

## Viewpoint Location Map

Redevelopment of the Beach Boulevard Property EIR

Figure I







Source: RBF Consulting (2013)



## View Looking West from Montecito Avenue and Palmetto Avenue

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 2a





Source: RBF Consulting (2013)



## View Looking West from Montecito Avenue and Palmetto Avenue

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 2b





Source: RBF Consulting (2013)



## View Looking West from Montecito Avenue and Palmetto Avenue

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 2c





Source: RBF Consulting (2013)



## View Looking Southeast from End of Pacifica Municipal Pier

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 3a







Source: RBF Consulting (2013)



## View Looking Southeast from End of Pacifica Municipal Pier

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 3b





Source: RBF Consulting (2013)



## View Looking Southeast from End of Pacifica Municipal Pier

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 3c





Source: RBF Consulting (2013)



## View Looking North from Sharp Park

Redevelopment of the Beach Boulevard Property EIR

JN 70-100421

Figure 4a





Source: RBF Consulting (2013)



**View Looking North from Sharp Park**  
Redevelopment of the Beach Boulevard Property EIR







Source: RBF Consulting (2013)



JN 70-100421

## View Looking North from Sharp Park

Redevelopment of the Beach Boulevard Property EIR

Figure 4c



## Conclusions

Preliminary design considerations for the project site call for taller residential buildings (but no more than 45 feet in height) to be located in the interior of the lot, and one residential building located perpendicular and adjacent to Palmetto Avenue. Lower-height buildings including the library, hotel and restaurant (up to 35 feet) would be located along the periphery of the site, particularly along Beach Boulevard and the coastal shoreline.

The proposed project is located at the base of a relatively steeply inclining hillside. The project would not obstruct any publicly-designated scenic viewpoints nor would it obstruct views in general from these hillsides.

When viewed from the shoreline, including the Pacifica Municipal Pier, Pacifica State Park, and Sharp Park, the proposed project would not visually break the ridgeline and would be developed against of backdrop of existing urbanized development (e.g. single-family tract housing) and therefore would not diminish a natural landscape view.

The proposed project will be developed as part of a Planned Development which will require subsequent detailed architectural design review and consistency with existing City policies and zoning regulations. As such, the ultimate building design will include articulation of building mass (e.g. setbacks), fenestrations such as windows, doors, eaves, etc., and variation in building materials and colors, which would be compatible with the other existing built structures that surround the project site and likely improve the overall visual character of the existing urban landscape. The project site is not located next to any coastal bluffs and would not block any coastal scenic views.

Based on these findings, the proposed project would not cause a significant impact to aesthetic resources and no mitigation measures are required.

## **Response to Comment 2-4 — Project Alternatives**

The commenter makes recommendations regarding the evaluation of a number of additional alternatives, namely:

“i) the reduction of and ii) the elimination of both residential and other non-priority uses such as the boutique hotel and restaurant. Other project alternatives should include but are not limited to: iii) design without construction of a road; iv) the relocation of open space areas to be in front of the residential units and accessible to the public as open space; v) the relocation of Beach Boulevard parking to be moved further inland; and vi) overall reduction in the size and scope of the project.

In general terms, it should be noted that the Draft EIR did not identify any significant impacts associated with land uses nor inconsistency with relevant policies, including those of the CA Coastal Commission (see Tables 3.7-1 and 3.7-2 of the Draft EIR).

Regarding the recommended additional alternatives, the following responses are provided:

#### Elimination of Residential and Other Non-priority Uses

CEQA only requires an analysis of a “reasonable range alternatives” that achieve most of the project objectives and would reduce or avoid identified significant environmental impacts (see CEQA Guidelines Section 15126.6). A key project objective of the City as stated in the Draft EIR is to “Entitle a high-quality development project that provides long-term economic return to the City.” Based on the preparation of the Boulevard Property Development Evaluation and Beach Boulevard Development Program (both by Leland Consulting Group, 2011), housing is required to make the rest of the project financially feasible. The revenue that the City generates through the sale of land for housing will be used to; finish site clean-up, build the street and sidewalk improvements, build the new Beach Boulevard parking lot, assist in the construction of the library, relocate utilities, process entitlements and permits, and otherwise make the project possible.

#### Design without Construction of a Road(s)

Design without construction of a road(s) is not feasible as there would be no vehicular access to the buildings and proposed underground parking and would not allow construction of the proposed new Pacific Avenue. As stated in the Draft EIR, “Pacific Avenue will be an east-west multi-modal link from Palmetto Avenue to the Beach Boulevard. While this roadway will be accessible by vehicles, it will function as a linear public plaza and include special pavement treatments, narrow intersections, street trees, special lighting and pedestrian amenities such as benches, trash receptacles, etc. The design will purposefully constrict vehicles (e.g. curbing, street trees, etc.) requiring them to move slowly and thereby ensure safe use by pedestrian and bicyclists.

Removal of internal roadways as an EIR alternative would preclude the City from meeting a key coastal access-related project objective, namely: “(To) Improve connections between Palmetto Avenue and the waterfront – including the Beach Boulevard Promenade, Pacifica Municipal Pier, the beach, and open spaces to the south. This will connect Pacifica’s commercial and cultural hub to the community’s greatest natural asset – the ocean.”

As such, this alternative is considered infeasible for both internal circulation, which is a critical design requirement; and coastal access requirements, which is a fundamental project objective.

#### Relocation of Open Space Areas

The minimal amount of open space within the project site is dedicated to private yard space and landscape setbacks as required for any residential land use. The only public space is the proposed roadways, including the Pacific Avenue Paseo.

The project site directly borders the existing Sharp Park and Pacifica State Beach and the Beach Boulevard Promenade, which is integrated with the regionally-serving coastal trail. The proposed project would provide enhanced coastal access to this significant coastal-related open space amenity, primarily via the proposed new Pacific Avenue, consistent with Coastal Commission coastal access policies. This existing Beach Boulevard Promenade, while well-used, is not at capacity, and the northern portion of Sharp Park (as shown in Figure 4) is often underutilized. The development of yet additional open space would not appreciably enhance the existing coastal open space and would make the project financially infeasible, as documented in the Beach Boulevard Property Development Evaluation and associated financial feasibility analysis (Leland Consulting Group, 2011).

### Relocation of Beach Boulevard Parking Inland

The existing Beach Boulevard parking lot is accessed directly from Beach Boulevard which extends along the Beach Boulevard Promenade and the coastal shoreline. Not only does the parking lot provide direct access to the coast, it also provides a place for the public to look out at the ocean without getting out of their cars. This is particularly useful for people who are disabled, want to stop for a short period, and/or during times of inclement weather (e.g., cold, windy, rainy, etc.). Similar to other coast-front parking areas such as the Esplanade in Capitola Beach, the Coastal Commission has long considered parking along the shoreline to be an important coastal access amenity.

The proposed project will reconfigure the existing Beach Boulevard parking lot by moving it closer to the shoreline and improving access and circulation, particularly through traffic traveling south on Beach Boulevard. It will also allow more efficient development of the project site. Montecito Avenue will be reconfigured from parallel to angled parking. The result will be an overall improvement in the safety, location and circulation of parking, particularly for public access. Additional parking will be constructed internally along the two north-south roadways.

Finally, most people traveling to the coast drive south on Beach Boulevard and look for parking. Therefore, the recommendation to locate the parking further east (inland) is contrary to the recommended alternative to “design without construction of a road” as a roadway would be needed if parking access from Beach Boulevard were to be maintained.

### Reduction in the Size and Scope of the Project

A reduction in the size and scope of the Project was considered in the Draft EIR. Alternative #2 - Civic and Residential Focus Alternative would consist of construction of a 36,500 square foot library and 4,500 square foot of commercial (restaurant) similar to the proposed project, but would eliminate construction of the boutique hotel and increase the number of residential units by 28 for a total of up to 112 residential units. Given the proximity to the ocean, and the fact that the project site is located within the coastal zone (and therefore subject to the City’s LCP), this alternative would limit the maximum building height to 35 feet for the project site (as opposed to 45 feet as

described for the proposed project), as is currently allowed under the City's existing Zoning Code and Local Coastal Plan.

Alternative #2 was determined be the environmentally superior alternative, as it would reduce impacts to aesthetics, air quality, noise, and transportation due to a reduction in building heights and a reduction in the number of vehicle trips.

## **Response to Comment 2-5 -- Hazards/Geotechnical**

### Coastal Flooding and Erosion

The commenter states that: "The project is located on the bluff adjacent to the ocean. The Coastal Act requires new structures to be set back adequately for the lifetime of the structure (usually 100 years) without the need for shoreline armoring...This information is necessary to ensure all development is setback adequately for the life of the structures without the need for a seawall."

The proposed project is not located on a bluff. It is located in front of a revetment and concrete seawall). See [Figure 3\(a-c\) –View Looking Southeast from End of Pacifica Municipal Pier](#).

With respect to the potential for coastal flooding and erosion, see the complete discussion on page 3-46 of the Draft EIR. As noted, surface elevations at the project site range from approximately 13 to 25 feet above mean sea level (msl). A study prepared by Skelly Engineering/GeoSoils, Inc. determined that the maximum wave run-up for the 50-year and 100-year recurrence intervals oceanographic (storm) conditions would be, respectively, about elevation 23.0 feet msl and elevation 24.5 feet msl. The study concluded that the Beach Boulevard revetment and wall system is severely overtopped at elevations of about 23 feet MSL. The overtopping occurs on average a few times per year. The wave driven water coming over the top of the wall has been observed to be between one to two feet in height.

The commenter asked that a "wave uprush study" be prepared for the project site. But it is unclear what more/new information would be acquired by preparing another study than what has already been analyzed by Skelly Engineering/GeoSoils Inc. and documented in the Draft EIR. This discussion has been expanded in the Hydrology & Water Quality section of the EIR, and is shown below in "Changes to the Draft EIR."

### Sea Level Rise

The commenter states that the Commission relies on the "best available science" which indicates sea level rise from 2000 to 2050 of up to two feet; however, no source is cited.

The State of California Seal-Level Rise Interim Guidance Document (October 2010) provides guidance for incorporating sea-level rise projections into planning and decision making for projects in California. It concludes that sea levels along the California

coastline are projected to rise between 10 and 17 inches (average of 14 inches) between 2000 and 2050.<sup>1</sup>

The State of California Governor's Executive Order S-103-08, which was issued on November 14, 2008, states that: "...all projects that have filed a Notice of Preparation, and/or are programmed for construction funding the next five years, or are routine maintenance projects as of the date of this Order may, but are not required to, account for these [sea level rise] planning guidelines." Furthermore, that "Sea level rise estimates should also be used in conjunction with appropriate local information regarding local uplift and subsidence, coastal erosion rates, predicated higher high water levels, storm surge and storm wave data."

### **Response to Comment 2-6 – Water Quality**

Comment noted regarding water quality requirements and regulations.

See the Impact 3.3-4 discussion on page 3-45 regarding project compliance requirements, including the preparation of a Storm Water Pollution Prevention Plan (SWPPP).

### **Response to Comment 2-7 -- Lower Cost Visitor-Serving Development**

Proposed development would not be high-cost visitor serving. The library and new City Council Chambers/public meeting space would serve and be free to the public.<sup>2</sup>

The boutique hotel would be a small hotel, different from larger, full-service commercial hotels. It would be a moderately priced visitor-serving facility, consistent with the findings presented in the Beach Boulevard Property Development Evaluation prepared by Leland Consulting Group (2011).

As shown in [Table FEIR-1: Hotels in the City of Pacifica](#), there are currently six hotels in the City of Pacifica providing a total of 282 rooms. The average daily rate for a hotel room in the City of Pacifica is \$144 (as of February 2011). Leland Consulting Group recommended development of a boutique hotel. Boutique hotels, as the name suggests, are often smaller than large name-brand hotels. It would be a mid-sized hotel, providing a unique brand and atmosphere, distinctive theme or design, personal service level, and distinctive experience. Boutique hotels differentiate themselves by delivering a unique and memorable experience and while not the lowest costs, do not compete with larger, full service, and more expensive hotels.

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<sup>1</sup> Sea-Level Rise Task Force of the Coastal and Ocean Working Group of the California Climate Action Team (CO-CAT); *State of California Sea-Level Rise Interim Guidance Document*, October 2010.

<sup>2</sup> Apart from a minor room rental fee for the multi-purpose meeting room for some events, depending on the user and nature of the activity.

Table FEIR-1: Hotels in the City of Pacifica

Hotel	Number of Rooms	Average Daily Rate
Best Western Lighthouse Hotel	97	\$214
Sea Breeze Motel	20	\$92
Pacifica Motor Inn	43	\$129
Holiday In Express & Suites Pacifica	38	\$169
America's Best Value Inn Pacifica	32	\$112
Pacifica Beach Hotel	52	\$150
<b>Total</b>	<b>282</b>	<b>\$144</b>

Source: Beach Boulevard Property Development Evaluation, Leland Consulting Group, February 2011.

### Response to Comment 2-8 – Priority Uses

See Response to Comment 2-2 — Public Benefit, above, regarding the list of proposed visitor-serving, coastal related uses.

### Response to Comment 2-9 – Parking

The general public currently uses parking on and adjacent to the site to access the Pacifica Promenade, beach and pier, Palmetto Avenue merchants, and other destinations. [Table DEIR 2-2: Public Parking](#) (from the Draft EIR), shows the public parking that is available now and following redevelopment of the site.

Table DEIR 2-2: Public Parking

Public Roadway	Existing Spaces	Future Spaces
Beach Boulevard Parking Area <sup>1</sup>	34	31
Montecito	13	20
<b>Total</b>	<b>47</b>	<b>51</b>

Notes:

(1) Total parking is 54 spaces, 20 of which are appropriated to on-site uses and are also used for public parking.

Source: City of Pacifica, 2012.

The Beach Boulevard parking lot currently has 54 spaces. Of these, 20 are associated with on-site use of the Administration Building (City offices and Council Chambers), leaving 34 publicly available parking spaces for coastal access parking. While these spaces are often used by the public (particularly when there is no City Council meeting and because the building is in poor condition and is no longer used for administrative purposes), they are not entitled public parking spaces dedicated exclusively for coastal access parking.



As part of the proposed project, the Beach Boulevard parking lot will be relocated to the western edge of Beach Boulevard to allow site redevelopment. In addition, parking on Montecito Avenue will be reconfigured from parallel to angled parking, netting an additional seven spaces on the block between Beach Boulevard and Palmetto Avenue. Following redevelopment, there will be a net addition of four public spaces.

On-site parking for the project site will be accommodated by both below-grade and surface parking. Parking for each use will be dedicated to that use, though there will be some shared parking, particularly between the boutique hotel and restaurant. Given the fact that the proposed project is a mixed-use development and located within a walkable, relatively urban environment, parking standards for shared-use development was utilized. Because the City does not have a specific shared-use parking standard for mixed-use residential and retail development, parking standards for “suburban center/town centers”, were used based standards endorsed by the Metropolitan Transportation Commission (MTC 2007).<sup>3</sup>

Based on these standards, the Draft EIR determined that the proposed project would provide sufficient parking spaces to meet the demands of the proposed uses, as shown in [Table DEIR 2-3: Parking Demand & Supply Analysis for Proposed Project](#) of the Draft EIR and reprinted below.

**Table DEIR 2-3: Parking Demand & Supply Analysis for Proposed Project**

Land Use	Size	Parking Standard	Spaces Required (Demand)		Spaces Provided (Supply)	Net Difference
			by Use	Shared		
Library <sup>1</sup>	36,500 sf.	2/1,000 sf. <sup>2</sup>	73		77	4
Hotel	75	1/room <sup>3</sup>	75	198	198	--
Restaurant	4,500	4/1,000 sf. <sup>4</sup>	18			
Housing	84 units	1.25/unit <sup>4</sup>	105			

Notes:

- (1) Includes café and meeting space / Council Chambers.
- (2) Per Sec. 9-4.2818 of the Pacifica Municipal Code with 20 % discount for shared use and patrons arriving via walking, bike, and bus.
- (3) Per Sec. 9-4.2818 of the Pacifica Municipal Code.
- (4) MTC 2007, page 47 for shared-use parking standards for Small Towns.

<sup>3</sup> *Reforming Parking Policies to Support Smart Growth – Toolbox/Handbook: Parking Best Practices & Strategies for Supporting Transit Oriented Development in the San Francisco Bay Area*, prepared by the Metropolitan Transportation Commission in coordination with the Association of Bay Area Governments and the Bay Area Air Quality Management District, June 2007, page 47.

This analysis shows that the amount of public parking spaces would not be diminished as a result of the proposed project and that on-site parking will be sufficient to meet future demand associated with the proposed project.

### **Response to Comment 2-10 – Public Recreation**

The DEIR was incorrect when it stated that the site had been historically used for recreational purposes. See “Changes to the Draft EIR”, below.

The site has been historically used as a wastewater treatment for more than 50 years. See Site History, beginning on page 2-3 of the Draft EIR.

As described in Response to Comment 2-2— Public Benefit, above, the proposed project maintains, enhances and improves existing coastal-related recreational opportunities.

### **Response to Comment 2-11 – Public Access**

See Response to Comment 2-2 — Public Benefit, above, regarding improved coastal-related public access that would occur as a result of the proposed project.

In particular, the following public access benefits are discussed:

4. Expanded coastal access via Pacific Avenue, a new pedestrian- and bike-friendly paseo that will connect Palmetto Avenue (Pacifica’s designated main street), to its coastal assets. Combined, these amenities will create a new location to draw visitors and local residents to the coast.
6. Redesigned and improved public parking with direct pedestrian access to the shoreline and the Beach Boulevard Promenade and regional coastal trails.
7. Pedestrian and parking improvements to Montecito and Palmetto Avenues including rebuilt sidewalks, two small plazas (adjacent to the library entrance and on Beach Boulevard), signage, planters and landscaping, and new seating.
8. Reuse of a site that is currently largely inaccessible to the public, and is an eyesore located in the heart of the city’s designated main street, Palmetto Avenue. Palmetto Avenue is one Pacifica’s cultural hearts, and hosts the city’s largest public event, Fog Fest.

### **Response to Comment 2-12 – Other**

The proposed library would not have large windows facing the ocean. The library would front Montecito and Palmetto Avenues. Additionally, the project plans, including the illustration of the proposed library as shown on the cover of the Draft EIR, are currently conceptual only. Any subsequent development will be subject to detailed design review as part of the Planned Development review process.

### 3. Changes to the Draft EIR

- I. Page ES-2 of the Executive Summary of the Draft EIR is changed as follows:

#### **Areas of Known Controversy**

~~To date there has been substantial public controversy associated with the conversion of a parcel that has been historically used for recreational purposes. Approximately four letters were received on the Notice of Preparation that identified a range of issues for inclusion in the Draft EIR, which are included in Appendix A of the Draft EIR. These issues have been addressed herein.~~

Four letters were received on the Notice of Preparation that identified a range of issues for inclusion in the Draft EIR, which are included in Appendix A of the Draft EIR. These issues include the following:

**City/County Association of Governments of San Mateo County** – raised concerns regarding compliance with the San Mateo County Congestion Management Program (CMP) and potential impacts the proposed project may have on current and future cumulative traffic conditions on nearby CMP-designated roadway segments.

**Caltrans** – recommended the development of Travel Demand Management (TDM) polices to encourage use of nearby public transit and to reduce vehicle trips on Highway I; encouraged the City of Pacifica to prepare the Traffic Impacts Study consistent with Caltrans “*Guide for the Preparation of Traffic Impact Studies*”; and reminded the City of Pacifica that any project work that requires movement of oversized or excessive load vehicles on state roadways obtain a transportation permit that is issued by Caltrans.

**CA Department of Fish & Game** – requested that the City address any potential significant impacts to endangered, threatened, and/or locally unique biological species and habitat on or adjacent to the project site.

**CA Coastal Commission** – raised concerns regarding coastal hazards related to shoreline erosion, potential impacts to visual resources, and ensuring there is adequate public access to the shoreline.

Additionally, as part of the preparation of a Boulevard Property Development Evaluation and Beach Boulevard Development Program (Leland Consulting Group, 2011) for the project site, the City conducted an extensive public outreach program to solicit community feedback regarding future development of the project site including identification of an appropriate mix of uses and development intensity. This outreach effort included two open houses in August and September of 2011, a series of stakeholder interviews, a project website, and a number of public meetings before the City Council including a final presentation in September of 2011. While there were comments raised to ensure that any future project adequately address potential neighborhood impacts particularly as they relate to traffic, parking, and noise, the

community and stakeholders expressed very strong support for the project and development of a current vacant and blighted city block.

2. Following the last paragraph on page 3-85 of the Hydrology & Water Quality Section of the Draft EIR (the end of the section) is changed as follows:

### **Coastal Storm Surge**

As noted in Section 3.3 Geology & Soils, Skelly Engineering and GeoSoils Inc. found that maximum wave run-up for the 50-year and 100-year storm conditions would occur over elevation 23.0 feet MSL and elevation 24.5 feet msl, respectively. The study concluded that the existing Beach Boulevard revetment and wall is severely overtopped at elevations of about 23 feet MSL. This overtopping is reported to occur on average a few times per year and the wave-driven water has been observed at one or two feet in height over the seawall.

According to GeoSoils Inc. (2007), water run-up, water moving on a bore after the wave breaks, can travel up and over shoreline protection. Waves have in the past and will in the future overtop the Beach Boulevard shore protection. It is a rare event and may look dramatic when it hits the seawall, but in reality is less than a foot of water that actually flows over the top and spreads out quickly. This is not a continuous flow of water like a river, but rather a pulse of water that arrives in 15 to 30 second intervals and will only occur for about one hour during the highest tide. Wave run-up motion is primarily up and down as it hits the shoreline protection structure and has lost almost all of its energy.

The project site has been designed to minimize vulnerability to storm surge in a number of ways. First, the western boundary of the project site is located 60 to 140 feet from the seawall. The closest building footprints will be at least 60 feet from the sea wall and constructed at a base elevation of 25 feet MSL, a full two (2) feet above the overtop elevation of 23 feet MSL. The proposed project would re-align Beach Boulevard and construct a sidewalk and curb along Beach Boulevard fronting the hotel and restaurant, which would route the water downhill (south) and into the City's storm drain system.

Secondly, as shown in [Figure 2-9: Parking Plan](#), the only portion of the proposed development that may be impacted by a small amount of water is the garages of the two mid-site residential structures. A garage is not habitable and under FEMA regulations, is allowed to be flooded on a temporary basis. However, to access these garage entrances, storm surge water would have to travel east on Montecito and then south on the internal north-south roadway. This roadway would include sidewalks and curbs and water would be channeled to flow into the City's storm drain system. The driveways would be crowned so that any overtopping water has to run up hill to enter the garage. Should water proceed down the driveway (which would be very remote at this point), a

trench drain at the entrance of the garage will intercept this water before entering the garage.

Given the design considerations of distance from the seawall, building elevations, storm drains in roadways, and trench drains at garage entrances, the likelihood of inundation from storm surge wave run-up would be very remote and is considered less than significant.

3. Page 4-19 of the Draft EIR, last paragraph, is modified as follows:

Table 5.1-4 4-3: Comparison of Project Alternatives to the Proposed Project

4. Page 4-20 of the Draft EIR, Table 4-3: Comparison of Project Alternatives to the Proposed Project, last row is modified as follows:

<b>Environmental Category</b>	<b>Alternative #1 - No Project Alternative</b>	<b>Alternative #2 - Civic and Residential Alternative</b>	<b>Alternative #3 - Civic &amp; Commercial Focus Alternative</b>
Ability to Meet Project Objectives	<del>Similar</del> Not Consistent	Similar	Similar

5. The following reference is added to Chapter 5 References of the Draft EIR:

GeoSoils Inc., Additional Discussion of Raising Beach Boulevard, Wave Runup Reflection, and Garage Flooding, Pacific Beach Condominiums, 1567 Beach Boulevard, Pacifica, CA, letter dated March 2, 2007 and March 22, 2007.



## 4. Mitigation Monitoring and Reporting Program

### Mitigation Monitoring Program Procedures

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The City of Pacifica (the “City”) is the Lead Agency for the proposed Redevelopment of the Beach Boulevard Property project and is therefore responsible for enforcing and monitoring the mitigation measures in this Mitigation Monitoring Program (MMP).

A Draft Environmental Impact Report (DEIR) has been prepared to address the potential environmental impacts of the project. Where appropriate, this environmental document identified project design features or recommended mitigation measures to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur. This MMP is designed to monitor implementation of the required mitigation measures and conditions set forth for project approval for the proposed project as identified in the DEIR and the Final Environmental Impact Report (FEIR). The mitigation measures as well as the conditions set forth for project approval are listed and categorized by either Section and/or impact area, with an accompanying identification of the following:

- Monitoring Phase, the phase of the project during which the mitigation measure shall be monitored:
  - Pre-Construction, including the design phase
  - Construction
  - Operation (post-construction)
- Implementing Party, the party responsible for implementing the mitigation measure.
- The Enforcement Agency, the agency with the power to enforce the mitigation measure.
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The MMP for the proposed project will be in place throughout all phases of the project. The project applicant shall be responsible for implementing all mitigation measures unless otherwise noted. The applicant shall also be obligated to provide certification, as identified below to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented. The City will be used as the basic foundation for the MMP procedures and will also serve to provide the documentation for the reporting program.

Generally, each certification report will be submitted to the City in a timely manner following completion/implementation of the applicable mitigation measure and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The City shall assure that project construction occurs in accordance with the MMP. Departments listed below are all departments of the City unless otherwise noted.

## Air Quality

### **MM 3.2-1a: Implementation of Short-Term Construction Best Management Practices.**

The following BAAQMD Best Management Practices (BMPs) shall be included in the construction-contract specifications for the proposed project. The control measures shall be implemented during the duration of all proposed construction activities:

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



<b>Monitoring Phase</b>	Construction
<b>Implementing Party</b>	Applicant/Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department/ BAAQMD <sup>4</sup>
<b>Monitoring Agency</b>	Planning and Economic Development Department

**MM 4.2-1b: Compliance with ACM and LBP Regulations**

During Renovation Activities. Pursuant to Cal OSHA regulations BAAQMD Regulation 11, Rule 2, each structure proposed for renovation within the project site shall be inspected by a qualified environmental specialist for the presence of ACM and Lead Based Paint LBP prior to renovation. If ACMs and LBPs are found during the investigation, a remediation plan shall be developed to ensure that these materials are removed and disposed of by a licensed contractor at an approved landfill facility in accordance with all federal, state, and local laws and regulations prior to demolition.

<b>Monitoring Phase</b>	Construction
<b>Implementing Party</b>	Applicant/Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department/ BAAQMD
<b>Monitoring Agency</b>	Planning and Economic Development Department

**Geology & Soils**

**MM 3.3-1: Preparation of Design-Level Geotechnical Report**

The City shall consult with a registered geotechnical engineer to prepare a design level geotechnical report once detailed site development plans are available that incorporates the recommendations in the preliminary geotechnical investigation by Cornerstone Earth Group (March 2012), including: earthwork measures, and foundation recommendations. This report shall be prepared in conjunction with final building plans. Prior to final inspection, the project applicant shall provide certification from a qualified professional that the proposed project was constructed in accordance with the design-level geotechnical investigation.

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<sup>4</sup> Bay Area Air Quality Management District.

<b>Monitoring Phase</b>	Pre-Construction/Construction
<b>Implementing Party</b>	Applicant/Geologist/Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department
<b>Monitoring Agency</b>	Planning and Economic Development Department

## Hydrology & Water Quality

### MM 3.3-4a: Stabilization of Grading Activities During the Rainy Season

All grading activities shall be stabilized as soon as possible after completion of grading. No grading shall occur between October 15th and April 15th unless authorization in writing by the City of Pacifica and an approved erosion control measures are in place.

<b>Monitoring Phase</b>	Pre-Construction/Construction
<b>Implementing Party</b>	Applicant/Engineer /Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department
<b>Monitoring Agency</b>	Planning and Economic Development Department

### MM 3.3-4b: Implementation of Storm Water Pollution Prevention Plan (SWPPP).

Prior to issuance of grading permit, the project proponent shall file a Notice of Intent (NOI) as required by Regional Water Quality Control Board regarding stormwater discharges associated with construction activities. Upon completion of construction activities, a Notice of Termination shall be filed.

Prior to issuance of any building or grading permits, a Storm Water Pollution Prevention Plan (SWPPP) shall be prepared by the project contractors and submitted to the Regional Water Quality Control Board for review and comment and to the City of Pacifica in conjunction with the Building/Grading/Site work permit and shall be found to be acceptable by the City prior to ground disturbance activities. The SWPPP shall be prepared to Regional Water Quality Control Board standards, Association of Bay Area Government’s Manual of Erosion and Sedimentation Control Measures (2005) or the California Stormwater Quality Association’s (CASQA) Best Management Practice (BMP) Handbooks for Construction and for New Development and Redevelopment (2009) requirements, and shall identify erosion minimization and control provisions, pollution detection provisions, and pollution elimination/ minimization provisions appropriate to the proposed project for construction and post-construction activities. The SWPPP shall include best available technology, engineering, and design solutions such as the use of silt screens, hay bales, modern trash screens, energy dissipaters, and/or absorbent devices. Stormwater runoff water quality monitoring procedures shall be clearly detailed in the SWPPP.

<b>Monitoring Phase</b>	Pre-Construction/Construction/Operation
<b>Implementing Party</b>	Applicant/Engineer/Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department/RWQCB <sup>5</sup>
<b>Monitoring Agency</b>	Planning and Economic Development Department

**MM 3.6-3: Adequately Size Storm Drain Facilities**

Prior to issuance of building permit, each project applicant within the project site shall coordinate with the City of Pacifica Public Works Department to prepare the necessary calculations to ensure that future proposed development on the project site would be adequately served by the existing storm drain facilities and that new storm drain facilities under new streets would be sized appropriately for the proposed development.

<b>Monitoring Phase</b>	Pre-Construction/Construction/Operation
<b>Implementing Party</b>	Applicant/Engineer/Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department/RWQCB
<b>Monitoring Agency</b>	Planning and Economic Development Department

**Transportation and Circulation**

The following is a mitigation measure for a cumulative impact.

**MM 4-1: Restriping of Oceana Boulevard and Paloma Avenue.**

Prior to any final residential occupancy permit for residential portion of the project, the project applicant shall implement restriping and bicycle facility improvements at the intersection as shown on [Figure 4-3: Proposed Intersection Mitigation: Oceana Boulevard & Paloma Avenue](#), and described as follows:

- Eastbound Approach (Paloma Avenue): Provide a 75 foot exclusive right-turn lane on the eastbound approach by removing on-street parking on the north side of Paloma Street. This distance will accommodate the anticipated right-turn lane 95th percentile queue, approximately 3 vehicles.

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<sup>5</sup> Regional Water Quality Control Board.

- Westbound Approach (Paloma Avenue): Restripe the westbound approach of Paloma Avenue to include an exclusive left-turn lane and a shared through / right-turn lane.
- Provide Class-III bicycle facility signage and pavement markings in both the eastbound and westbound directions on the Paloma Avenue bridge between Oceana Boulevard and Francisco Boulevard.

Implementation of this mitigation measure will improve traffic operations at the intersection of Oceana Boulevard and Paloma Avenue to an acceptable LOS D during the AM peak hour and maintain the existing acceptable LOS C during the PM peak hour.

<b>Monitoring Phase</b>	Pre-Construction/Construction/Operation
<b>Implementing Party</b>	Applicant/Engineer/Contractor
<b>Enforcement Agency</b>	Planning and Economic Development Department / Public Works
<b>Monitoring Agency</b>	Planning and Economic Development Department / Public Works



Source: RBF Consulting (August 2012)



## Proposed Intersection Mitigation: Oceana Boulevard & Paloma Avenue

Redevelopment of the Beach Boulevard Property EIR







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