
VI. GENERAL IMPACT CATEGORIES

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

“Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.”

Based on the analysis contained in this SEIR, the proposed project would result in significant unavoidable environmental impacts related to aesthetics (scenic vistas, scenic resources from a scenic highway, and visual character of the project site and surroundings), and noise (substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project). The proposed project would also result in cumulatively considerable impacts to aesthetics, biological resources, and noise.

B. GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed action could be growth inducing. This includes ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines reads as follows:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some project which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

The proposed project would add short-term employment opportunities provided during the construction phase of the project that would contribute to short term economic growth. Although the project would provide short-term employment opportunities, which would likely be filled from the local employee base, with the possible exception of a few household and landscape maintenance jobs, no permanent jobs would be created by the proposed project. Therefore, the project would not result in long-term employment growth in the area. The proposed project

consists of 24 condominium units within 12 duplexes, making the occupancy of the development approximately 65 residents. According to the 2010 Census, the City of Pacifica's population is estimated at 37,234.¹ The City's population for the year 2015 is estimated to be 39,260.²

The project site is located within a developed urban setting. Road improvements would serve the proposed project site only and therefore, would not attract development on surrounding undeveloped land and would not be growth inducing.

The preliminary drainage plan consists of a series of storm drain inlets and storm drains in the private driveway (and beyond) to capture runoff and direct it to the water quality basin proposed to be located near the project entrance. From the water quality basin the runoff would be conveyed by another storm drain that would connect to the City's existing storm drain system in Fassler Avenue. Water and sewer lines would be connected between each residential unit, in the private driveways and ultimately to the existing water and sewer mains located in Fassler Avenue. The City of Pacifica would provide municipal sewer distribution and treatment services while the North Coast County Water District would provide water service to the proposed project. Because extensions to the existing water and sewer lines would connect directly to each residential unit via the private driveways, these extensions would not induce growth in surrounding undeveloped areas. See Section V.A (Impacts Found To Be Less Than Significant) for an in-depth discussion regarding impacts for Utilities and Service Systems.

The relatively low residential population generated by the proposed project would result in an increased demand for the public services. However, the proposed project would be adequately served by existing public services such as fire/emergency and police services in the vicinity of the project site and would not create a need for new or altered governmental facilities; project impacts on public services would be less than significant. Therefore, the project would not result in significant growth inducing impacts. See Section V.A (Impacts Found To Be Less Than Significant) for an in-depth discussion regarding impacts for Public Services.

C. SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT

Section 15126.2(c) of the CEQA Guidelines states that significant irreversible environmental changes associated with a proposed project shall be discussed, including the following:

- *Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;*
- *Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and*

¹ Bay Area Census. City of Pacifica. Accessed September 28, 2015 at www.bayareacensus.ca.gov/cities/Pacifica.htm.

² United States Census Bureau. City of Pacifica. Accessed July 27, 2016 at http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmmk.

- *Irreversible damage that could result from environmental accidents associated with the project.*

The project would permanently occupy the primary scenic vista of the Pacific Ocean and distant Marin Headlands available from Fassler Avenue and would commit future generations to a close up view of the project. See Section V.B (Aesthetics) for an in-depth discussion regarding impacts to Aesthetics.

Construction of the proposed project would require the use of nonrenewable resources (i.e., wood, metals, sand, gravel, fossil fuels) for building materials and to fuel construction vehicles and equipment. Subsequent use and maintenance of the project would also require the long-term consumption of these nonrenewable resources at reduced levels.

The project would use common cleaning and maintenance materials, which would be shipped, stored, used and disposed of in accordance with applicable regulations. Otherwise, the proposed project would not involve the routine use, transport, or disposal of hazardous materials. During project construction the project would be required to follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. For these reasons, the project would not result in any significant hazards to the public or the environment through the routine transport, use or disposal of hazardous materials, or through upset or accident conditions. See Section V.A (Impacts Found To Be Less Than Significant) for an in-depth discussion regarding impacts for Hazards and Hazardous Materials.

Implementation of the project would increase the amount of activity on the site, which would increase the likelihood of environmental accidents, such as fire on the site. However, federal and state safety regulations, as well as local compliance monitoring by the North County Fire Authority would limit the potential for irreversible environmental damage caused by fire.

D. ENERGY USAGE AND CONSERVATION

CEQA provides that EIRs shall include a detailed statement on significant effects of a project and “mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” The State CEQA Guidelines discuss the requirements for an EIR to address potentially significant effects, and although it does not include energy specifically, it mentions the use of nonrenewable resources. The State CEQA Guidelines require an EIR to discuss energy conservation measures, if relevant. Appendix F to the guidelines addresses energy conservation goals, notes that potentially significant energy implications of a project should be considered in an EIR, and contains general examples of mitigation measures for a project’s potentially significant energy impacts. The primary sources of energy usage for the proposed project would include electricity generation and the combustion of fossil fuels by motor vehicles. Implementation of the proposed project would introduce energy usage on a site that is currently undeveloped and thus, uses no energy. Energy consumption during construction would include vehicles and other equipment and would be temporary in nature. Construction

energy consumption would not represent a wasteful, inefficient, and unnecessary consumption of energy. Energy consumption during operation of the proposed project would result from building heating and cooling, refrigeration, lighting, electronics, and kitchen appliances. As described in Section IV (Project Description), the project site lighting would be designed to comply with LEED standards. As described in Section V.A (Impacts Found To Be Less Than Significant Impacts), operational energy usage in the form of natural gas for water heaters and cooking appliances were factored into the project's total emissions. The proposed project would not result in daily direct or indirect emissions that would exceed BAAQMDs thresholds, and therefore, this energy use would not be considered wasteful, inefficient, or unnecessary. Operational energy consumption would also result from the vehicle trips generated by the proposed project. According to the Traffic Study and Peer Review provided in Appendix G, the additional traffic due to the proposed project would have a less-significant-impact on the affected intersections. The project site also contains 3.6 acres of land designated by the General Plan as Low Density Residential. Therefore, the proposed project is consistent with regional growth projections in the area, including increased vehicle trips, and would not constitute an unnecessary or wasteful source of energy consumption.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

The State CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the project while still meeting the general project objectives. The State CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines states: *“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”*

Purpose

Section 15126.6(b) of the CEQA Guidelines states: *“Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.”*

Significant Project Impacts

As described in Section V.B (Aesthetics), the proposed project would have significant and unavoidable impacts on Aesthetics, specifically on scenic vistas, scenic highways, and the visual character of the project site and its surrounding. Implementation of all feasible mitigation measures listed in Section V.B (Aesthetics) would not reduce these impacts to less than significant. Also, as described in Section V.G (Noise), the proposed project would have a significant and unavoidable noise impact related to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Implementation of all feasible mitigation measures listed in Section V.G (Noise) would not reduce these impacts to less than significant.

No significant project impacts remain with implementation of the proposed mitigation measures for the environmental issue areas listed below. Impacts associated with the following topics would be significant without implementation of mitigation measures, but would be reduced to a less-than-significant level if the mitigation measures listed in the SEIR are implemented.

- Air Quality
- Light and Glare
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hydrology and Water Quality
- Noise (Expose Persons to or Generate Noise Levels in Excess of Standards)
- Transportation and Traffic
- Tribal Cultural Resources

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states: *“The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also 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. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”*

Project Objectives

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project. The objectives of the proposed project are specific to the project as currently proposed and are not the same project objectives included in the 2007 Final FEIR. The objectives of the proposed project are as follows:

1. Provide 24 new condominiums in 12 duplexes.
2. Maximize the allowable development area of the parcels.
3. Provide a single access to the project via Fassler Avenue.

4. Provide maximum common open space in the form of picnic areas, gardens, pathways, etc.

Overview of Selected Alternatives

The alternatives to be analyzed in comparison to the proposed project include:

Alternative A: No Project Alternative

Alternative B: Redistribution of Units Project Alternative

Alternative C: Reduced Density Project Alternative

Alternative D: Reduced Height Project Alternative

Alternatives Considered but Rejected as Infeasible

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible for detailed study, and briefly explain the reasons underlying the lead agency's determination. Furthermore, Section 15126(f)(1) states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries...and whether the proponent can reasonably acquire or control or otherwise have access to the alternative site. No one of these factors established a fixed limit on the scope of reasonable alternatives."

An alternative involving commercial uses permitted within the Neighborhood Commercial (C-1) zoning designation, such as retail, service commercial, and offices was rejected as infeasible as it would not meet most of the project objectives including the objectives to provide 24 condominiums on-site, to maximize the allowable development on the parcels, or provide maximum open space in the form of picnic areas, gardens, pathways, etc. An alternative involving agricultural uses on the site was also rejected because such an alternative would not meet most of the project objectives including the objectives to provide 24 condominiums on-site, to maximize the allowable development on the parcels, or provide maximum open space in form of picnic areas, gardens, pathways, etc. An off-site alternative was rejected as infeasible because the project applicant does not own any other property that would be feasible for this project or that could accommodate the density of this project in the City of Pacifica and cannot "reasonably acquire, control or otherwise have access to [an] alternative site" (refer to §15126.[f][1] of the CEQA Guidelines). An alternative including industrial uses on the project site was dismissed because it would not meet most of the project objectives including the objectives to provide 24 condominiums on-site, to maximize the allowable development on the parcels, or provide maximum open space in form of picnic areas, gardens, pathways, etc. and it would not be consistent with the General Plan land use designation. Finally, an open space or park alternative was rejected as infeasible because it would not meet most of the project objectives including the

objectives to provide 24 condominiums on the-site, to maximize the allowable development on the parcels, or to provide a single access to the project via Fassler Avenue and it would not be consistent with the General Plan land use designation.

Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate significant impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the proposed project and assumes that all applicable mitigation measures proposed for the project would apply to each alternative. The following alternatives analysis compares the potential significant environmental impacts of two alternatives with those of the proposed project for the environmental topics analyzed in detail in Sections IV.B – IV.F of the Draft SEIR.

A. NO PROJECT ALTERNATIVE

As required by CEQA, this subsection analyzes a “No Project” Alternative (Alternative A). Under Alternative A, the proposed project would not be constructed, and the project site would remain in its current condition. The analysis of Alternative A assumes the continuation of existing physical conditions on the site, as well as development of the related projects described in Section III.C (Related Projects). The potential environmental impacts associated with Alternative A are described below and are compared to the environmental impacts associated with the proposed project.

Aesthetics

Under Alternative A, no grading or development would occur on the project site and the existing aesthetic characteristics, including views to the Pacific Ocean and distant Marin Headlands from Fassler Avenue, would remain unchanged. The remnants of the old asphalt road present on the project site would not be demolished. This SEIR concluded that project impacts related to scenic vistas, scenic resources, and visual character would be significant and unavoidable. Impacts to light and glare would be less than significant after mitigation. Under Alternative A, there would be no impact to aesthetics and this alternative would eliminate significant and unavoidable impacts related to aesthetics.

Biological Resources

Because the project site would not be developed under Alternative A, no grading would occur and no vegetation would be removed from the site. Thus, Alternative A would have no impacts related to the special-status wildlife species, sensitive natural communities, jurisdictional waters, wildlife movement, wildlife habitat, and conflict with local policies and ordinances. However, under Alternative A, invasive non-native plant species on the project site would not be restored with

native vegetation. While the proposed project's significant biological resources impacts can be mitigated to less-than-significant levels, biological resources impacts under Alternative A would be substantially less compared to the proposed project.

Geology and Soils

No grading or development on-site would occur under Alternative A. While the proposed project's significant landslide impacts can be completely mitigated, there would be no landslide impacts associated with Alternative A as no grading would occur that could potentially exacerbate the existing off-site landslide at the head of the broad, colluvium-filled ravine that extends downslope from the northern edge of the project site (Figure V.D-1). The proposed project would result in less than significant impacts related to soil erosion and loss of topsoil via compliance with existing NPDES regulations, whereas no impacts would occur under Alternative A related to soil erosion and loss of topsoil as no grading would occur under this alternative.

Hydrology and Water Quality

Under Alternative A, no grading or development would occur on-site and therefore this alternative would result in no impact related to hydrology and water quality. Specifically, Alternative A would result in no impact to the following categories under hydrology and water quality: violation of water quality standards or waste discharge requirements, substantial erosion or siltation through alteration of drainage patterns, and flooding by altering drainage patterns or generating runoff that exceeds the capacity of the storm drain system. Via compliance with existing NPDES regulations, the proposed project would result in less-than-significant impacts to each of these hydrology and water quality categories described above.

Transportation and Traffic

Under Alternative A, no development on the project site would occur, and as such, no new vehicle trips would be generated. Therefore, this alternative would result in no impacts related to transportation and traffic, specifically related to: construction traffic, intersection impacts, congestion management plan, site access and circulation, and pedestrian access. While the project's significant traffic impacts related to vehicle access and circulation and pedestrian access can be completely mitigated, traffic impacts associated with Alternative A would be less compared to the proposed project.

Noise

Under Alternative A, no construction or development would occur on the project site. This SEIR concluded that project impacts related to substantial temporary or periodic increases in noise associated with construction activities could be significant, and with implementation of the prescribed mitigation measures, these impacts would be reduced to a less-than-significant level. Because no construction would occur and no residential units would be developed under Alternative A, these significant (but mitigatable) project impacts would be eliminated. This SEIR

also concluded that project impacts related to a substantial temporary or periodic increase in ambient noise levels would be significant and unavoidable. Because no construction would occur under Alternative A, this alternative would eliminate these significant and unavoidable project impacts.

Relationship of the Alternative to the Project Objectives

Alternative A would not meet any of the project objectives as they are focused primarily on the development of a new residential community in the City of Pacifica. Because Alternative A would not involve any construction and no new residential development would occur, the project objectives would not be met.

B. REDISTRIBUTION OF UNITS PROJECT ALTERNATIVE

The General Plan designation for approximately 3.6 acres of the western portion of the site is Open Space Residential, which allows one unit per more than five acres. 7.6 acres on the eastern portion of the site is designated as Low Density Residential, which allows three to nine units per acre. Under Alternative B (Redistribution of Units Project Alternative), the proposed project would maintain the existing General Plan land use designations which would allow one unit on the western parcel on the site and the remaining 23 units on the eastern parcel on the site. Because the site plan under Alternative B would be consistent with the zoning designations, a transfer of development rights would not be required for project implementation. The residential units under Alternative B would be clustered on the eastern portion of the site, which is different from the proposed project, which the majority of the units would be sited on the western parcel on the site. Under Alternative B, 23 of the proposed units would be sited along the hillside in the eastern portion of the project site. The number of parking spaces would not change from that under the proposed project. Circulation under this alternative would be altered to include roads and parking behind the 23 units but with the same driveway location as the proposed project.

Aesthetics

Alternative B includes development of 24 residential structures, one of which would be sited on the western parcel of the project site and the remaining 23 to be sited on the eastern parcel. Alternative B would involve construction of the eastern 23 units at a higher elevation on the south side of the existing ridgeline in the center of the site that parallels Fassler Avenue. For the proposed project, the SEIR concluded that impacts related to scenic vistas, scenic resources within a scenic highway and visual character would be significant and unavoidable and that impacts related to light and glare would be less than significant with mitigation. Under Alternative B, the proposed structures would be massed along Fassler Avenue, with no setback, to allow construction in the narrow area between the ridge and Fassler Avenue. The multi-story structures would be accessed from a driveway on the ridge above, and would eliminate views of cars and garages along Fassler Avenue.

Views of the project from Fassler Avenue would be close-up of the architecture, and would shift the visual character of the upper portion of the site to a more residential character, similar to areas just up Fassler Avenue. The new structures would not block long-distance scenic vistas from the lower portion of the site, particularly the scenic vista of the Pacific Ocean and distant Marin Headlands that qualified Fassler Avenue a scenic corridor designation in the General Plan. As a result, Alternative B would reduce the project's significant and unavoidable impacts to scenic vistas to less than significant after mitigation.

Highway 1 is listed as eligible for the Scenic Highway Program and the project site is partially visible looking south from Highway 1. Concentrating housing along Fassler Avenue under Alternative B would reduce but not eliminate the visibility of the proposed residences from lower elevations like scenic Highway 1. As discussed in more detail in Section V.B (Aesthetics), views along Fassler Avenue are a scenic resource according to the City's General Plan. Under Alternative B, the proposed structures would be massed along Fassler Avenue and views of residential uses from Fassler Avenue would be close-up. This alternative would convert this undeveloped area to residential development and significantly impact scenic resources from an eligible scenic highway and the visual character of the project site and surroundings. Mitigation Measures AES-1 and AES-2 would reduce these impacts but not to a less-than-significant level. Alternative B would therefore result in significant and unavoidable impacts related to scenic resources within a scenic highway and the visual character of the site and surroundings. Light and glare impacts under Alternative B would be less than significant after mitigation, similar to the proposed project.

Biological Resources

Development of Alternative B would involve the siting of almost all structures on the eastern parcel of the site. The SEIR concluded that impacts related to impacts on candidate, sensitive, or special-status species; jurisdictional waters; wildlife movement; and wildlife habitat could be significant and, with implementation of mitigation measures, would be less than significant. The total developed area on the project site under Alternative B would be greater because more of the project site would be developed along Fassler Avenue rather than in the clustered configuration of the proposed project. Also, Alternative B would include the same (one) driveway location as the proposed project but access from the western parcel to the eastern parcel would include an on-site road between the two parcels. As shown in Figure V.C-1, northern coastal scrub is located on both project site parcels and would be developed under either the proposed project or Alternative B. Unlike the proposed project, the one unit on the western parcel under Alternative B can be designed to avoid the 0.17 acre of willow thicket and potentially jurisdictional waters. Similar to the proposed project, all potentially significant impacts to biological resources under Alternative B can be reduced to less-than-significant levels.

Geology and Soils

Section V.D (Geology and Soils) of the SEIR concluded that the proposed project would result in less-than-significant impacts after mitigation related to landslides and unstable soils and less-than-significant impacts related to soil erosion and loss of topsoil via conformance with existing NPDES requirements. Given only one unit would be developed under this alternative which would require much less grading on the western portion of the site compared to the project, impacts related to landslides would be less under this alternative, and less than significant with implementation of Mitigation Measure GEO-1. Similar to the proposed project, impacts related to soil erosion and loss of topsoil would also be less than significant under this alternative.

Hydrology and Water Quality

The SEIR concluded that that project impacts related to hydrology and water quality would be less than significant, specifically related to violation of water quality standards or waste discharge requirements, substantial erosion or siltation through alteration of drainage patterns, and flooding by altering drainage patterns or generating runoff that exceeds the capacity of the storm drain system. Via compliance with existing NPDES regulations, Alternative B would also result in less-than-significant impacts to each of these hydrology and water quality categories described above.

Transportation and Traffic

Alternative B would include the development of 24 residential units on the project site, similar to the project, resulting in the same vehicle trip generation as the project. This SEIR concluded that project impacts related to vehicle access and circulation (sight distance and ingress and egress) and pedestrian access (on-site sidewalks) can be completely mitigated, whereas all other transportation and traffic impacts would be less than significant (i.e., construction traffic, intersection impacts, congestion management plan, site access and circulation related to turning conflicts with the new residential driveway across Fassler Avenue, and pedestrian access related to the lack of a continuous sidewalk along Fassler Avenue). Given Alternative B would result in the same trip generation and driveway location to Fassler Avenue, this alternative would result in similar transportation and traffic impacts as the project.

Noise

Alternative B would include the development of 24 residential units on the project site, similar to the project. This SEIR concluded that project impacts related to substantial temporary or periodic increases in noise associated with construction activities could be significant, and with implementation of the prescribed mitigation measures, these impacts would be reduced to a less-than-significant level. Because Alternative B involves the same number of units as the project, these noise impacts would be similar to the project, and can be mitigated to less-than-significant levels. This SEIR also concluded that project impacts related to a substantial temporary or periodic increase in ambient noise levels would be significant and unavoidable. Because the

generally the same construction would occur under Alternative B, this alternative would also result in the same significant and unavoidable impacts.

Relationship of the Alternative to the Project Objectives

Assuming the design for Alternative B is economically feasible, this Alternative would meet most all of the project objectives as it would provide 24 new condominiums, maximize the allowable development area of the parcels, provide a single access to the project via Fassler Avenue, and provide maximum common open space in the form of picnic areas, gardens, pathways, etc. However, this alternative would not provide 12 duplexes.

C. REDUCED DENSITY PROJECT ALTERNATIVE

Alternative C assumes the project site would be developed with 12 units, which is 50 percent fewer units than proposed by the project. The reduced number of units under Alternative C is based on the lowest density permitted under the proposed re-designation of the western parcel of the site from Open Space Residential to Low Density Residential, which, at a minimum, would allow three units per acre. The site plan configuration would be similar to the proposed project, but 12 units would be eliminated and the outdoor area associated with each unit would be increased. Similar to the proposed project, the residential units would be a mix of two and three stories. A full circulation loop would no longer be required as the units that would not be constructed under Alternative C would primarily be the western-most units; specifically units 1 through 12 (refer to Section IV, Project Description).

Aesthetics

Alternative C involves the development of 12 residential structures, 12 fewer than with the proposed project. This SEIR concluded that project impacts related to scenic vistas, scenic resources within a scenic highway, and visual character would be significant and unavoidable and impacts to light and glare would be less than significant with mitigation incorporated. Under Alternative C, the massing, siting, height, and architecture of the structures that would be developed would be similar to those proposed under the project. However, the structures that contribute to the project's significant and unavoidable impacts related to scenic vistas and scenic resources within a scenic highway would be reduced. Under Alternative C, the views from Fassler Avenue would not be adversely altered and, as such, impacts within a scenic highway (Fassler Avenue) would not be substantially damaged, as under the proposed project. As shown in Figure V.B-9, the westernmost structures are those that contribute to the identified aesthetic impacts of the project. Under Alternative C, impacts related to scenic vistas, scenic resources within a scenic highway, and visual character of the site and surroundings would be less than the proposed project and would be reduced to less-than-significant levels with the identified mitigation measures. Impacts related to light and glare would be less than significant after mitigation, similar to the proposed project.

Biological Resources

Development under Alternative C would include 12 residential units, 12 fewer than under the proposed project. The SEIR concluded that impacts related to special-status species, jurisdictional waters, habitat wildlife movement, and wildlife habitat could be significant and, with implementation of mitigation measures, would be less than significant. Because of the reduced density under Alternative C, impacts mentioned above could also be reduced to less-than-significant levels with mitigation measures, but would be less than under the proposed project given the reduced development footprint.

Geology and Soils

Alternative C would include grading and site preparation and development of 12 residential structures. The SEIR concluded that impacts related to landslides and unstable soils could be significant but with implementation of mitigation measures, would be reduced to a less-than-significant level. Although development that would occur under Alternative C would be less than under the project, recommendations contained in the geotechnical investigation, which are now required mitigation measures, would be relevant for development under Alternative C. With implementation of Mitigation Measure GEO-1, impacts related to landslides and unstable soils would be less than significant, similar to the proposed project. Similar to the proposed project, Alternative C would result in less than significant impacts related to soil erosion and loss of topsoil via compliance with existing NPDES regulations.

Hydrology and Water Quality

Alternative C would include grading activities, development of drainage improvements at the project site, and development of 12 residential structures. This SEIR concluded that project impacts related to hydrology and water quality would be less than significant, specifically related to violation of water quality standards or waste discharge requirements, substantial erosion or siltation through alteration of drainage patterns, and flooding by altering drainage patterns or generating runoff that exceeds the capacity of the storm drain system. Via compliance with existing NPDES regulations, Alternative C would also result in less-than-significant impacts to each of these hydrology and water quality categories described above.

Transportation and Traffic

Alternative C would include development of 12 residential units on the project site, 12 fewer than the proposed project. This SEIR concluded that project impacts related to vehicle access and circulation (sight distance and ingress and egress) and pedestrian access (on-site sidewalks) can be completely mitigated, whereas all other transportation and traffic impacts would be less than significant (i.e., construction traffic, intersection impacts, congestion management plan, site access and circulation related to turning conflicts with the new residential driveway across Fassler Avenue, and pedestrian access related to the lack of a continuous sidewalk along Fassler

Avenue). Given Alternative C would result in approximately 50 percent fewer vehicles trips per day and during the AM and PM peak hour travel periods as well as the same driveway location to Fassler Avenue, this alternative would result in the same impacts described above as the proposed project but in a lesser manner due to 12 fewer units compared to the project.

Noise

Alternative C would include development of 12 residential units on the project site, 12 fewer than the proposed project. This SEIR concluded that project impacts related to substantial temporary or periodic increases in noise associated with construction activities could be significant, and with implementation of the prescribed mitigation measures, these impacts would be reduced to a less-than-significant level. While Alternative C involves fewer units than the project, construction would occur in a similar on-site footprint resulting in significant impacts that can be mitigated to less-than-significant levels. This SEIR also concluded that project impacts related to a substantial temporary or periodic increase in ambient noise levels would be significant and unavoidable. Because the construction would occur in a similar on-site footprint under Alternative C, this alternative would also result in significant and unavoidable impacts.

Relationship of the Alternative to the Project Objectives

Alternative C would meet three of the four project objectives. Alternative C would maximize the allowable development area of the parcels as the site plan configuration would be similar to the proposed project. Alternative C would also provide single access to the project via Fassler Avenue, and would provide maximum common open space in the form of picnic areas, gardens, pathways, etc. However, this alternative would not provide 24 new condominiums in 12 duplexes. At the reduced density identified, it is unclear whether the project would be economically feasible.

D. REDUCED HEIGHT PROJECT ALTERNATIVE

Under Alternative D the project would include all buildings of two stories high, and each building height would be a maximum of 35 feet in height. This decrease in building height may necessitate a lower number of residential units than the proposed 24 units. The proposed amenities of the site would remain the same as would access and circulation.

Aesthetics

Alternative D includes development of 24 or less residential structures at or below 35 feet in height, but the units would occupy the same general footprint of the proposed project. The SEIR concluded that impacts related to scenic vistas, scenic resources within a scenic highway, and visual character would be significant and unavoidable and that impacts related to light and glare would be less than significant with required mitigation. The bulk and massing of the proposed structures would be similar to the proposed project under Alternative D. The reduction of building height would maintain compliance with the City's height limit. However, since the siting of structures would remain the same, the impact to scenic vistas, scenic resources within a scenic

highway, and visual character would remain significant and unavoidable. Since the amount of development would either remain the same or be reduced under this alternative, impacts related to light and glare would be less than significant after mitigation, similar as with the proposed project.

Biological Resources

Alternative D would include the development of 24 or less residential buildings at 35 feet or below in height, but the siting would remain generally the same. The SEIR concluded that impacts related to candidate, sensitive, or special-status species; jurisdictional waters; wildlife movement; and wildlife habitat; could be significant and, with implementation of mitigation measures, would be less than significant. Because under Alternative D, units would be sited in the same general location as the proposed project, impacts mentioned above could also be reduced to less-than-significant levels with mitigation measures, similar to the proposed project.

Geology and Soils

Alternative D would include grading and site preparation and development of 24 or less structures, all at or below 35 feet in height. Section V.D (Geology and Soils) of the SEIR concluded that impacts related to landslides and unstable soils could be significant, but with implementation of Mitigation Measure GEO-1, would be reduced to a less-than-significant level. Section V.D (Geology and Soils) of the SEIR also concluded that the proposed project would result in less-than-significant impacts related to soil erosion and loss of topsoil via conformance with existing NPDES requirements. Development that would occur under Alternative D would be similar to or less than that under the proposed project and would be subject to similar recommendations made in the geotechnical report for the proposed project which are now required mitigation measures for the project. With implementation of Mitigation Measure GEO-1, landslide and unstable soils impacts would be less than significant under Alternative D, similar to the proposed project.

Hydrology and Water Quality

Alternative D would include grading activities, development of drainage improvements at the project site, and development of 24 or less residential structures, all at or below 35 feet in height. This SEIR concluded that project impacts related to hydrology and water quality would be less than significant, specifically related to violation of water quality standards or waste discharge requirements, substantial erosion or siltation through alteration of drainage patterns, and flooding by altering drainage patterns or generating runoff that exceeds the capacity of the storm drain system. Alternative D would also result in less-than-significant impacts to each of these hydrology and water quality categories described above via compliance with existing NPDES regulations.

Transportation/Traffic

Alternative D would include development of 24 or less residential units, all at or below 35 feet in height, resulting in similar vehicle trip generation as the project. Under this alternative the development would occur with the same general footprint, with similar circulation and access from Fassler Avenue. This SEIR concluded that project impacts related to vehicle access and circulation (sight distance and ingress and egress) and pedestrian access (on-site sidewalks) can be completely mitigated, whereas all other transportation and traffic impacts would be less than significant (i.e., construction traffic, intersection impacts, congestion management plan, site access and circulation related to turning conflicts with the new residential driveway across Fassler Avenue, and pedestrian access related to the lack of a continuous sidewalk along Fassler Avenue). Given Alternative D would result in similar trip distribution and the same driveway location to Fassler Avenue, this alternative would result in similar transportation and traffic impacts as the project.

Noise

Alternative D would include development of 24 or less residential units, all at or below 35 feet in height, similar to the proposed project. This SEIR concluded that project impacts related to substantial temporary or periodic increases in noise associated with construction activities could be significant, and with implementation of the prescribed mitigation measures, these impacts would be reduced to a less-than-significant level. Alternative D involves the same amount of units as the project and construction would occur in the same on-site footprint resulting in significant impacts that can be mitigated to less-than-significant levels. This SEIR also concluded that project impacts related to a substantial temporary or periodic increase in ambient noise levels would be significant and unavoidable. Because the construction would occur in the same on-site footprint under Alternative D, this alternative would also result in significant and unavoidable impacts.

Relationship of Alternative D to the Project Objectives

Alternative D would meet all of the project objectives with the possible exception of not providing all 24 new condominiums.

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the City and/or project applicant.

Based on the analysis presented in this section, Alternative A, the No Project Alternative, would result in the greatest reduction in project impacts and would be the environmentally superior alternative. However, CEQA requires that if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives (*CEQA Guidelines*, Section 15126.6[e][2]). Based on the analysis provided above and in the Alternatives Comparison Table below (Table VII-1), it has been determined that Alternative C (Reduced Density Alternative) would be the environmentally superior alternative, because this alternative would result in the greatest reduction in significant project impacts and would meet three of the four project objectives. Alternative C involves the least amount of units on-site compared to the other alternatives (excluding the No Project Alternative), resulting in less on-site population, traffic, operational air quality, GHG and noise emissions, and demands for public services and utilities.

**Table VII-1
Alternatives Comparison**

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Redistribution of Units Project Alternative)	ALTERNATIVE C (Reduced Density Project Alternative – Environmentally Superior Alternative)	Alternative D (Reduced Height Project Alternative)
Aesthetics					
Scenic Vistas	Significant and Unavoidable	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation	Significant and Unavoidable
Scenic Resources from a Scenic Highway	Significant and Unavoidable	No Impact	Significant and Unavoidable	Less Than Significant with Mitigation	Significant and Unavoidable
Visual Character of the Project Site and Surroundings	Significant and Unavoidable	No Impact	Significant and Unavoidable	Less Than Significant with Mitigation	Significant and Unavoidable
Light and Glare	Less Than Significant with Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant with Mitigation
Biological Resources					
Candidate, Sensitive, Special Status Species					
<i>Special-Status Plants</i>	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
<i>California Red-legged Frog</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
<i>Dusky-footed Woodrat</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Redistribution of Units Project Alternative)	ALTERNATIVE C (Reduced Density Project Alternative – Environmentally Superior Alternative)	Alternative D (Reduced Height Project Alternative)
<i>Nesting Birds</i>	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Sensitive Natural Community	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Jurisdictional Waters	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Wildlife Movement	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Wildlife Habitat	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Conflict with Local Policies or Ordinances	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Geology and Soils					
Strong Seismic Ground Shaking	No Impact	No Impact	No Impact	No Impact	No Impact
Landslides	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Redistribution of Units Project Alternative)	ALTERNATIVE C (Reduced Density Project Alternative – Environmentally Superior Alternative)	Alternative D (Reduced Height Project Alternative)
Soil Erosion and Loss of Topsoil	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Unstable Soils	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Expansive Soils	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Hydrology and Water Quality					
Violate Water Quality Standards or Waste Discharge Requirements During Construction Phase	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Violate Water Quality Standards or Waste Discharge Requirements During Operational Phase	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Substantial Erosion or Siltation through Alteration of Drainage Patterns	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Flooding by Altering Drainage Patterns or Generating Runoff that	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Redistribution of Units Project Alternative)	ALTERNATIVE C (Reduced Density Project Alternative – Environmentally Superior Alternative)	Alternative D (Reduced Height Project Alternative)
Exceeds the Capacity Drainage System					
Transportation and Traffic					
Construction Traffic Impacts	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Existing Plus Project Intersection Impacts	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Conflict with an Applicable Congestion Management Program	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Access and Circulation (Sight Distance)	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Access and Circulation (Ingress and Egress)	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Access and Circulation (Turning Conflicts))	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Result in Inadequate Emergency Access	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Pedestrian Access and Circulation Impacts (On-site Sidewalks)	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation

IMPACT AREA	IMPACTS OF THE PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Redistribution of Units Project Alternative)	ALTERNATIVE C (Reduced Density Project Alternative – <i>Environmentally Superior Alternative</i>)	Alternative D (Reduced Height Project Alternative)
Pedestrian Access and Circulation Impacts (Off-site Sidewalks)	Less Than Significant	No Impact	Less Than Significant	Less Than Significant	Less Than Significant
Noise					
Expose Persons to or Generate Noise Levels in Excess of Standards	Less Than Significant With Mitigation	No Impact	Less Than Significant With Mitigation	Less Than Significant With Mitigation	Less Than Significant With Mitigation
Substantial Temporary or Periodic Increase in Ambient Noise Levels	Significant and Unavoidable	No Impact	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable

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