2.0 RESPONSES TO COMMENTS

1. California Department of Transportation

Comment #1.1: Design
Response to Comment #1.1: The project access roads do not connect to the state highway system. Therefore, standards of the state Highway Design Manual do not apply to the project. The Draft EIR considered sight line distances and proposed mitigation to improve the length of the stopping sight distance of project turn lanes affecting project intersections with Roberts Road and Fassler Avenue. Geometric plans of the project will be required by the City of Pacifica. A courtesy copy of the geometric plans will be submitted to Caltrans as requested.

2. City of Pacifica Open Space Committee

Comment #2.1: Motion Adopted
Response to Comment #2.1: The motion adopted by the Open Space Committee is not a comment directed toward the adequacy of the Draft EIR analysis or its mitigation measures. No CEQA response is required.

The applicant has reduced the maximum building size from 5500 square feet to 4300 square feet and reduced the maximum building height from 35 feet to 29 feet for all 13 lots of the Planned Development (Attachment D). The 2-acre parcel development would also meet these restrictions (see Response to Comment #3-3 III.1).

The Draft EIR analyzes the visual impact of the project and concludes it will be reduced to a less than significant level with implementation of Mitigation Measure AES-1 (Draft EIR Section 4.3).

The Draft EIR considers different alternative site design, including the Clustered Development Alternative which would place houses in a different location off the ridgeline. Clustered design concepts are presented in this Final EIR in Attachment C. The Draft EIR concludes that a Clustered Development would moderately increase the visibility of the project structures (Draft EIR Section 10.5).

3. William Leon, Planning Commissioner, City of Pacifica Planning Commission

Comment #3-1: Project Grading
Response to Comment #3-1:
<u>I.A1 through A5. Grading Excavation</u>
A grading plan for the project subdivision is shown in Draft EIR Figure 7. The grading plan shows excavation and fill required to construct the new project access road and the separate access driveway to Lot 11. Grading on individual lots would be determined at the time a site plan for each lot is submitted for city approval. Grading footprints for the home sites vary in size from approximately 5,200 square feet to 6,900 square feet. The maximum cut and fill for the

building envelopes are 17.7 feet and 9.1 feet respectively (pers. Com. Stuart Newton). Grading on each lot has not been calculated since individual building plans have not been prepared. Grading requirements for each lot will be determined at the time individual site plans are prepared and submitted to the City for approval. The grading disturbance zone on individual lots would be limited to the building envelopes specified as shown on the project grading plan (Draft EIR Figure 7) and the site development plan (Draft EIR Figure 4). Individual lot quantities will vary based on home design. Grading for the lots would result in building pads that are graded with roughly equal amounts of cut and fill (Draft EIR Section 6.2.2). Fill berms would be constructed on the slope of each lot to provide visual screening of the homes. Berm height would be determined at the time individual building plans are prepared and have a maximum height of 10 feet (Draft EIR Section 2.3.4).

The project road corridor (from Roberts Road to Fassler Avenue) is approximately 2,030 feet in length and grading varies in width between 50 to 70 feet. The maximum cut and fill for this road are 10.7 feet and 6.8 feet respectively. The cul-de-sacs serving Lots 8 through 10 are approximately 720 total feet in length and grading varies in width between 40 to 100 feet. The maximum cut and fill for these cul-de-sacs are 14.5 feet and 7.6 feet respectively. The cul-de-sac serving Lot 11 is approximately 370 feet in length and grading is approx 50 feet in width. The maximum cut and fills for this road are 10.7 feet and 6.2 feet respectively (pers. Com. Stuart Newton).

The estimated cut and fill grading calculations in the Draft EIR have been revised by the project engineer (see Text Amendments for Draft EIR Page 2-5). The revised grading quantities are less than the 27,918 cubic yards of cut assessed in the Draft EIR (Section 2.3.5). Grading quantities required for road construction only (not including building envelopes) are estimated to be 20,152 cubic yards (CY) of cut, 5,002 CY of fill for a net of 15,150 CY of cut. Retention ponds require a 784 cubic yards of cut and increased sight line distances require an additional 270 cubic yards of cut. Total project grading is 21,206 cubic yards of cut, 5,002 of fill, and a net export volume of 16,204 cubic yards.

Exporting 16,204 cubic yards of material by haul trucks with a 20 cubic yard capacity would generate 810 truck trips. This would occur over a two-month period and would result in a daily truck traffic of 18 trips. These truck trips would be dispersed throughout the business day and would not occur during the morning an afternoon peak hour commute periods. The limitation of construction truck traffic to non-peak hours is a condition of project approval. The impact of haul truck traffic on local intersections is therefore not significant. The haul route for the trucks would be determined depending on the receiving location of the exported soil.

<u>I.B1. Roads</u>
See Responses A1 through A5 above.

<u>I.B2. Sight Triangle</u>
To provide for approx 215 feet of sight distance to the east (towards Fassler Avenue), approximately 2,250 square feet of minor grading would be required resulting in only approximately 150 cubic yards of cut. To provide for approximately 240 feet of sight distance to the west, approximately 3,220 square feet of minor grading would be required resulting in

approximately 120 cubic yards of cut. Both of these sight distances are greater than the minimum 200' required by Caltrans.

I.B3. Foundations and Excavations
Foundations and excavations for each housing unit will be determined when a site plan for each lot is prepared. Grading will be confined to building envelopes shown in the Draft EIR Figure 7 Grading Plan.

I.B4 through B6. Stormwater, Sewer, Utilities
Sanitary sewer, utilities, and storm drain lines will be constructed in the roadbed of the new project access road. Grading for these utilities is included in the grading calculations for the road (Draft EIR Section 2.3.5 and Response to Comment A1 through A4 above). Drainage from the road to the retention ponds will be conveyed through underground storm drain pipes installed in trenches likely 24 to 30 inches wide and 3 to 4 feet deep depending on the contractor's equipment. The trench will be cut vertically and backfilled the same day as installation. Soil excavated for trenching would be backfilled; any excavation amounts needed to be exported due to trenching is negligible. The total distance to connect to both basins will be roughly 530 linear feet where the trenching is outside the roadway.

I.B7. Retention Pond
The retention pond at the intersection of Roberts Road and Fassler Avenue has an area of 3,119 square feet and will require an average excavation of 5.5' for a total excavation volume of 635 cubic yards. The retention pond at the project entrance on Fassler Avenue has an area of 2,686 square feet and will require an average excavation of 1.5' for a total excavation volume of 149 cubic yards.

I.B8. Retaining Walls
Retaining walls would be constructed along the access road. Grading calculations for the retaining wall are incorporated with the grading calculations for the road. See Response to Comment A1 through A5 above.

I.B9. Other Below Grade Cuts
Grading will occur for road, ponds, and individual lots, and sight triangles. No other excavations are required or will occur.

I.C1 through C9. Grading Quantities
See Response to Comments B1 through B9 above.

I.C10. Total Cubic Yards
The total grading amount (road, ponds, and sight distances) is 21,206 cubic yards of cut, 5,002 of fill, and a net export volume of 16,204 cubic yards. See Response to Comment A1 through A5 above. The Draft EIR considered the environmental impacts associated with this amount of grading.

Comment #3-2: Runoff Volumes
Response to Comment #3-2:
II.B1 through B4. Impervious Areas.
Draft EIR Section 7.2.2.2 states that roughly 6 acres of the 67-acre project site would be developed with project access road and building envelopes. The areas covered by impervious are quantified in the Stormwater Control Plan in Draft EIR Appendix B, Sheet 1. Runoff from the road will be directed to ponds. Runoff from the roofs, walkways, driveways, and patios will be collected on each lot and directed to a planter (Appendix B, p. 5). Impervious areas per lot are shown in Appendix B (pp. 5 and 7) for the 13 lot subdivision. Impervious area for the 2 acre agricultural parcel is shown in Draft EIR Figure 5 and in the revised site plan shown in Attachment E. Impervious coverages for the 13-lot subdivision and the 2-acre agricultural lot are summarized in the following table for clarity.

Harmony@1 Planned Development with 2-acre Lot Impervious Surface Area		
	Impervious Area (square feet)	**Pervious Area (square feet)**
Lot 1	7,038	314,698
Lot 2	7,563	
Lot 3	7,281	
Lot 4	7,258	
Lot 5	7,078	
Lot 6	7,545	
Lot 7	6,788	
Lot 8	7,974	216,865
Lot 9	7,650	
Lot 10	6,952	
Lot 11	5,439	268,816
Lot 12	6,765	188,710
Lot 13	8,261	
2-acre lot	17,500	69,620
Project Road	52,242	0
Lot A	0	1,237,746
Parcel A	0	324,573
Lot B	0	158,491
Totals	163,334	2,779,519
Sources: Storm Water Control Plan (Draft EIR Appendix C), Draft EIR Figure 5		

II.C1, C2, D1, and D2. Pond Dimensions and Capacity
The detention pond at the intersection of Roberts and Fassler has an area of 3,119 square feet and a holding depth of 5 feet for a total volume of 15,595 cubic feet or 577 cubic yards. The retention pond at the project entrance on Fassler Road has an area of 2,686 square feet and a holding depth of 3 feet for a total volume of 8,058 cubic feet or 298 cubic yards. Water will be flowing from a 6 inch pipe with a flow capacity of 1 to2 cubic feet per second.

A Stormwater Control Plan (Plan) has been prepared for the project to address increased runoff from impervious surfaces (listed in the Draft EIR as Appendix B). The Plan addresses use of the detention ponds for the project access road and drainage from individual lots. The Draft EIR concludes that the detention basins have adequate capacity to handle the increased runoff from impervious surfaces and that with proper maintenance of the ponds, the impact is mitigated to a less than significant level (Draft EIR Section 7.3, Measure HYD-2).

Through the proposed CC&Rs, homeowners would be encouraged, but not required, to incorporate into their home designs at least a 1,000 gallon cistern to capture and use the stormwater from the roofs (See Attachment D).

Comment #3-3: Scenic Vistas and Scenic Roadways
Response to Comment #3-3:
III.1. Visual Impacts of 2-acre Agricultural Parcel
The 2-acre parcel is not included in the Planned Development and would not be subject to its CC&Rs. However, the owners of the 2-acre parcel (Husson Family) have voluntarily conformed their proposed home to the design requirements of the Planned Development and have incorporated energy efficient design concepts into the building plans. The 2-acre parcel would be built as shown in the building plans presented in Attachment E. The residence would be designed as a Sunset Breezehouse which utilizes current green building technology. The house design incorporates solar panels, collection of rain water in a below ground cistern, flat roofs, exterior sustainable materials, water conserving landscaping, and grey water recycling. The house is designed to maximize lighting by natural day light.

The residence would be built along the ridgeline contiguous with Lots 9 and 10. The building height is 26 feet and the living space is 4300 square feet in conformance with the design guidelines of the 13-lot Planned Development (Attachment E). Photo simulations of the 2-acre lot are included in Views 1 and 2 in Attachment B. As shown in View 2, the house would be visible from Linda Mar locations; however it is east of the prominent ridgelines on the property and does not visually interrupt the distant ridgeline behind the home. The Draft EIR concludes that the visual impacts of the entire project development (13-lot Planned Development and single home on 2-acre parcel) are reduced to a less than significant level by conformance with the project design features (Measure AES-1). The proposed development of the 2-acre agricultural parcel conforms to the design guidelines for the Planned Development. The visual impact of the 2-acre agricultural parcel is less than significant.

III.A. Review Process
The City of Pacifica has review authority over development on each lot and on any future accessory buildings and structures on each lot. Specific plans for each lot would be reviewed by the City of Pacifica Planning Commission and the Architectural Committee that will be established by the Homeowners Association for the project (Draft EIR Section 2.3.4). Secondary residential units would not be permitted on Lots 1 through 11 (see Applicant's Letter of Commitment in Attachment D of this Final EIR). Secondary residential units could be proposed in the future on Lots 12 and 13, but currently no second units are planned. These secondary units would be subject to City review and approval of an amendment for the lot development plan. Likewise, future construction of any accessory buildings must be approved by the City of

Pacifica and the Homeowners Association and must comply with the project design features and CCRs. City zoning regulations specify development standards for accessory structures such as coverage requirements, building heights, and setback distances.

III.B. Simulated Viewpoints

Simulated viewpoints from Mori Point, Rockaway Beach, and Linda Mar Beach are provided in Attachment B. Views from the Quarry would be similar from Mori Point. Night-time lighting is subject to numerous variables such as light placement, height, and screening and cannot be practically simulated. Based on City requirements, there will be 14 light poles evenly spaced with a distance of 150 feet between the poles. Photo simulations have not been prepared for project alternatives; however, concept plans have been prepared and are presented in Attachment C. Draft EIR Mitigation Measure AES-2 would ensure night light and glare from the project is minimized by requiring that exterior lighting be low mounted and downward casting. Use of flood lights is prohibited and night security lighting within individual residential lots must me restricted to normal exterior lighting. The Draft EIR concludes this measure would reduce the potential night light and glare impacts to a less than significant level (Draft EIR Section 4.3).

Comment #3-4: Environmental Impact Analysis

Response to Comment #3-4:

IV.A. Retention Pond Impact to Wildlife

The commenter states that the proposed project ponds may be used, visited by, and/or occupied by endangered, protected or Special-Status Species identified in the Draft EIR such as the San Francisco garter snake (SFGS), California red legged frog (CRLF), and San Francisco dusky-footed wood rat (SFDW). The proposed ponds would be shallow and designed to drain within 48 hours (Draft EIR Section 7.2.2.2). Due to the short duration of water retention, the project ponds would not create breeding habitat for or otherwise result in the use of the retention ponds by SFGS or CRLF. As stated in the Draft EIR, the likelihood for CRLF and SFGS to occur on the project site is low (Draft EIR Section 5.2.3.3) and Mitigation Measure BIO-9 would reduce any potential impact to CRLF and SFGS from project construction to a less than significant level. The presence of retention ponds would not adversely impact these species if they were to occur on the project site.

SFDW occurs on the project site as evidenced by the numerous SFDW houses observed (Draft EIR Section 5.1.3.1). The on-site habitat for the SFDW is determined by suitable vegetation cover (coastal scrub) and not the presence of water. SFDW houses may occur in the project area designated for the construction of the ponds (Draft EIR Section 5.2.3.3). As specified in Measure BIO-8 in the Draft EIR, pre-construction surveys of this area are required and SFDW houses found within the construction zone would be dismantled with guidance from California Department of Fish and Game. Once constructed, the project ponds would not adversely affect SFDW on the property. With the implementation of a mitigation plan specified in Measure BIO-8, the Draft EIR analysis concludes that the project impact to SFDW is mitigated to a less than significant level.

IV.B. Runoff Water Quality

Draft EIR Section 2.3.6.1 states runoff from the project access road will be routed to one of two retention ponds proposed as part of the project. The commenter refers to parking garages

however there are no parking garages proposed as part of the project. Runoff from roofs and driveways of individual lots would be collected and conveyed to planter boxes on each lot. The retention ponds and planter boxes would be constructed in accordance with the Stormwater Control Plan as listed in Draft EIR Appendix B. The ponds and planter boxes would be designed as bio-filtration basins. The basins remove pollutants primarily by filtering runoff slowly through a biologically active layer of soil held together by plant roots. The Draft EIR concludes that with proper maintenance of the basins, the impact to the water quality of storm water runoff would be less than significant (Draft EIR 7.2.2.2). Stormwater Control Plan Table 3 (Draft EIR Appendix B, page 8) identifies potential sources of stormwater pollutants and how the pollutants will be controlled. Measures are specified for on-site dumping into storm drains, indoor or structural pest control, landscape pesticide use, and vehicle washing.

IV.C. Wildlife Safeguards

Draft EIR Section 7.2.2.2 states that the project could result in increased sediment in storm runoff generated from the project site. The Draft EIR concludes that water quality impacts associated with the project would be reduced to a less than significant impact through Best Management Practices (BMPs) implemented through the State General Construction Activity NPDES Permit. Compliance with the NPDES Permit is required in mitigation Measure HYD-1. The retention ponds are designed to drain within 48 hours and would not create breeding habitat for frogs (see Response to Comment IV.A above). Project impacts to stormwater quality are less than significant; there would be no impacts to wildlife from the less than significant changes in stormwater quality on the project site.

Indirect effects of human activity on the project site are discussed in Draft EIR Section 5.2.2.5. As stated in this Section, wildlife harassment from curious or unknowing residents or site visitors can occur. Wildlife impacts can occur with loss of vegetation through trampling and from off leash pets. Mitigation Measures BIO-4 and BIO-5 would ensure that the common open space area is properly managed to minimize vegetation and wildlife impacts from human activity. The Draft EIR concludes that these measures should reduce the wildlife impact from human activity to a less than significant level.

Habitat alteration will occur on the site in the designated building areas. The remaining open space areas will be protected from alteration through protective measures identified in Draft EIR as Mitigation Measures BIO-1 through BIO-10. These measures include use of an onsite biological monitor during project construction and implementation of a habitat management plan for the common open space areas. Draft EIR Section 7.1.1 states that there are no perennial creeks, surface impoundments, wetlands, waters or aquatic habitats located within the project site. The project would not intercept flows or alter flows or patterns of streams, creeks, or drainages.

IV.D. Retention Pond Plants

The types of plants placed in the water detention pond areas have not been specified and will be determined by a design specialist. Ponds will be planted with vegetation that facilitates the bio-filtration of pollutants from the stormwater runoff. The primary purpose of the detention ponds is to detain stormwater flows from the project site to pre-development levels prior to discharge into the City's municipal drainage system. It is not the purpose of the pond to create new wildlife

habitat values on the project site, and as described in Response to Comment IV.A above, protected species are not expected to use or breed in such ponds.

Comment #3-5: Inclusionary Housing
Response to Comment #3-5: The City's Inclusionary Housing Ordinance requires the project to provide 2 units of affordable housing available for low and very low income families. As an alternative to provision of below market rate (BMR) units, an applicant may do one or a combination of the following: pay in-lieu fees, dedicate land, or construct BMR units on or off the project site for inclusionary housing (Draft EIR Section 3.1.2.5). The applicant proposes a land dedication of 2 acres on the southern end of the project property for use for inclusionary housing. The two acres will reduce the conservation easement from 28.4 to 27.3 acres and reduce Lot 11 from 6.5 acres to 5.6 acres. The proposed parcel boundaries are shown in Attachment F. Access to this parcel would be developed from an existing service road which connects to Roberts Road.

The design and number of BMR units which would ultimately be constructed on the property is undetermined. The applicant has proposed land dedication to satisfy the requirements of the Inclusionary housing ordinance. Upon accepting the land dedication, the City of Pacifica would become responsible for determining the nature and scope of its future development. Given that the affordable housing requirement for the Harmony@1 project is 2 BMR units, it is a reasonably foreseeable consequence of the project that the 2-acre parcel would eventually be developed with 2 residential units. While the details concerning any future development on the dedicated property is not now known, based on information now available, the environmental effect of adding 2 BMR units to the project site has been considered and is found not to be significant as discussed further below. Specifically, it does not result in any new significant impacts that were not already considered in the EIR; nor does it substantially increase the severity of any environmental impacts identified in the EIR. The 2 BMR units would not require any additional mitigation, as the applicable mitigation measures identified in the Draft EIR (i.e. AES-2, BIO-1, 2, 5, 7, 8, 9, and 11, GEO-1, 3, and 5, and HYD-1) would ensure that the project, including the additional units, would not result in any significant impacts.

<u>Land Use Planning</u>
The proposed inclusionary housing parcel (Attachment F) is located on the southern end of the project property. It is designated by the General Plan as Very Low Density Residential. Allowable development density in this land use designation is one unit per one-half acre to 5 acres. The proposed parcel is 2 acres which would allow a maximum of 4 units. The development of this parcel with 2 BMR units would be consistent with the density requirements of the Very Low Density Residential land use designation.

Once the land is dedicated, either the applicant would develop the units or the City would solicit bids for its development with affordable housing units. Future development of the BMR units would be subject to City Design Guidelines and Hillside Preservation District coverage limitations. Conformance with city standards would be determined at the time units are proposed for construction.

Aesthetics

The inclusionary housing parcel is located below the Prominent Ridgeline elevations on the project property. See Attachment F and Draft EIR Figure 10. The parcel has elevations ranging from approximately 40 feet to 90 feet. Community views of this portion of the project property are primarily limited to Linda Mar areas such as Pacifica State Beach, Crespi Drive, Linda Mar Boulevard, and Highway 1 (see Draft EIR Figure 12, Photos 6 to 9 and Attachment B, Views 2 and 3) and Pedro Point (see Draft EIR Figure 12, Photo 12 and Attachment B, View 1). Because the 2-acre parcel is located on the southeast side of the property ridgelines, the affordable housing units would not likely be visible from northern viewing locations such as Mori Point (see Attachment B, View 6).

Development of the inclusionary housing parcel would occur on the lower slope elevations of the Harmony@1 property. The affordable units would not be located on a ridgeline and would not block scenic vistas from other viewpoints. As stated in the Draft EIR (Section 4.2.4), Highway One is not a state designated Scenic Highway within the City of Pacifica although the City does consider it a sensitive scenic receptor. The affordable units would be visible to views from Highway 1. However, given the low elevations of the property and the visual proximity of the affordable units to existing development on Crespi Drive from Highway 1 views, the affordable units would not significantly alter the visual character of the viewshed. In addition, EIR Measure AES-2 would minimize night light and glare. Given these factors, the visual impact of the affordable units on community views is considered less than significant and would not change the conclusions or analysis provided in the Draft EIR.

Biology

The inclusionary housing property contains predominantly grassland vegetation with some Monterey pine and riparian scrub (see Draft EIR Figure 14). The affordable units would likely be constructed on the grassland slopes. Disturbance of the riparian scrub and Monterey pine vegetation communities along the southeastern property edge is not likely to occur given its peripheral location away from the point of access at the southwestern edge of the parcel and the developable slopes above them. Development of affordable housing would increase the loss of grassland vegetation on the project site by less than two acres. This would increase the total amount of impacted grassland from 3 acres to roughly 5 acres. The loss would not impact riparian, wetland, or special status vegetation communities. Even with this additional removal of grassland, the loss of grassland is a small portion of the 42.7 acres of grassland occurring on the project site and thus consistent with the analysis in the Draft EIR (Section 5.2.2.1) is not considered a significant impact.

The San Francisco dusky-footed woodrat habitat occurs along the southeastern property line of this proposed parcel (see Draft EIR Figure 16 and Figure 18) in the scrub vegetation. One woodrat house is known to occur where the easternmost corner of the parcel would be located (see Draft EIR 16 and Attachment F). Disturbance of the woodrat habitat is not necessary in order to develop the site nor is it likely to occur with development of the affordable units. EIR Measure BIO-8 mitigates the potential project impact on the San Francisco dusky-footed woodrat by requiring pre-construction surveys for woodrat houses, dismantling and/or relocation of woodrat houses in the construction impact zone, and control of non-native species in the common open space areas which could impair the woodrat habitat. These measures applied to

the 2-acre parcel would ensure that development of the affordable units would not significantly impact the San Francisco dusky-footed woodrat.

No other special status species are known to occur on the inclusionary housing site. Given its location, site development would not interfere with wildlife movement or conflict with local policies concerning biological resources. In addition to the measures identified above, EIR Measures BIO-5, BIO-7, BIO-9 and BIO-11 would also apply to these units. Thus, the addition of the inclusionary housing site does not change the analysis or conclusions in the Draft EIR.

The two acres dedicated for affordable housing would reduce the conservation easement from 28.4 to 27.3 acres and reduce Lot 11 from 6.5 acres to 5.6 acres. The loss of 1.1 acres from the common open space doesn't diminish the value of the open space parcel described in the Draft EIR.

Geology

The affordable housing would be built at the southern end of the project property on southeast facing slopes. The geologic conditions of the affordable housing site are shown in Draft EIR Figures 20 and 21. No geologic hazards exist on this parcel such as landslides, erosion gullies, unconsolidated fill, or surface rupture zones. The site does not contain soils subject to liquefaction.

Just as with construction on other portions of the property, affordable units built on the property would be subject to strong seismic shaking in the event of an earthquake. Consistent with the analysis and mitigation in the Draft EIR (6.2.3., EIR Measure GEO-1), constructing buildings in compliance with current building codes would ensure that the seismic safety impacts associated with the all units on the property, including the affordable housing units, are less than significant.

The entire project site may contain expansive soils which will require special considerations if present. EIR Measure GEO-5 outlines protective measures which would mitigate any impacts of expansive soils. With the application of these existing recommendations, the impact of expansive soils on affordable housing site would not be significant.

As already analyzed in the Draft EIR, the project site contains soils with a high potential for erosion. Consistent with the analysis in the Draft EIR, grading of project soils for the construction of affordable housing could increase erosion on the project site. Implementation of grading and drainage controls is required in EIR Measure GEO-3. With these controls, the potential erosion impacts on the property, including those associated with affordable housing development, is not significant.

Hydrology

Development of affordable housing would add impervious surfaces to the project property and increase the amount of storm water runoff. Drainage from the parcel would be directed to the existing storm drain line along Roberts Road. The line has adequate capacity to handle increased runoff from the affordable housing parcel (pers. Com. Maria Aguilar, Public Works Department). Increased runoff entering the city drainage system would not cause a significant impact on the drainage facilities.

Water quality of storm water runoff can be impacted by increased sediment during project grading and construction. Proper drainage controls would be required through compliance with conditions of the State General Construction Activity NPDES Permit and implementation of a Storm Water Pollution Prevention Plan. This is required in EIR Measure HYD-1. Application of this measure to the affordable housing development would ensure that water quality impacts to storm water would be less than significant level.

Water quality of storm water runoff can be impacted by increased sediment during project grading and construction. As with other portions of the project site, proper drainage controls would be required through compliance with conditions of the State General Construction Activity NPDES Permit and implementation of a Storm Water Pollution Prevention Plan. This is required in EIR Measure HYD-1. Application of this measure to the project, including any affordable housing development, would ensure that water quality impacts to storm water would be less than significant level.

Public Services

The addition of 2 BMR units to the project site would increase the residential population on the property. The addition of two houses would not significantly increase the number of service calls to city police or fire protection services. The project, even with any future affordable units, would not significantly impact the ability of police and fire departments to maintain existing service levels to the Pacifica community.

The development of 2 affordable housing units would add 2 new students to the schools in the community. The school districts reported that they had adequate capacity to accommodate students from the Harmony@1 project (Draft EIR Section 8.3.2). The addition of 2 more students from the affordable housing development is not a large increase and would not result in the need for additional schools or classroom facilities. The increase in student population is not significant and does not change the analysis in the Draft EIR.

Development of 2 affordable housing units would generate a population of 6 persons based on the City's standard occupancy rate of 2.74 residents per unit. This is not a significant increase in city population and would not result in substantial physical deterioration of park facilities or create a need for increased park space. The impact of affordable units on park facilities is not significant and the inclusion of the site does not change the analysis in the Draft EIR.

Traffic

The impact of including the 2 affordable housing units on project and cumulative traffic levels was assessed by RKH Civil and Transportation Engineering. The level of service for local intersections for Project Conditions with affordable housing units is presented in Table 1. Cumulative Conditions for the project including affordable housing units is presented in Table 2.

The two units are assumed to be single family, detached housing and are to be located at the south end of the project near the Roberts Road and Crespi Drive intersection. The addition of these two housing units does not change the LOS at the study area intersections from that previously presented in the Draft EIR (see Tables 9-5 and 9-6).

The addition of the affordable housing units to project conditions would not noticeably worsen the operating levels of the local intersections. At the Route 1/Fassler/Rockaway Beach intersection, the demand-to-capacity ratio would be increased by 0.003 and the intersection delay would be increased by 1.2 seconds during the AM peak hour (see Table 1). The delay is slightly higher than the 1.1 delay identified in the Draft EIR. At the Route 1/Reina Del Mar intersection, the demand-to-capacity ratio would remain as stated in the Draft EIR. The Draft EIR's significance standard is an increase in demand-to-capacity ratio of 0.010 and a 1 second increase in delay for LOS F intersections (Draft EIR, Section 9.2.1). While the delay component is met at one intersection (as it was without the affordable units), the demand-to-capacity ratio component is not met. Therefore, the combined impact of traffic from the project and affordable housing units upon the Route 1 intersections operating at LOS F is not significant.

Table 1
Intersection Levels of Service Project Conditions

Stop or Yield Controlled Intersections	Controlled Approach	Peak Hour	Background Conditions			Project Conditions with Affordable Housing		
			V/C	Delay	LOS	V/C	Delay	LOS
Fassler Avenue and Roberts Road	Roberts Road	AM		52.0	F		57.9	F
		PM		17.3	C		18.1	C
Fassler Avenue and Coast Lane	Coast Lane	AM		16.8	C		17.0	C
		PM		12.3	B		12.4	B
Route 1 and Coast Lane	Coast Lane	AM		30.7	D		30.4	D
		PM		12.3	B		12.3	B
Crespi Drive and Roberts Road	All-Way	AM	0.758	15.6	C	0.760	15.7	C
		PM	0.402	10.2	B	0.404	10.2	B
Roberts Road and Site Access Street	Site Access Street	AM					9.6	A
		PM					8.8	A
Signal Controlled Intersections		**Peak Hour**	**Background Conditions**			**Project Conditions**		
			V/C	Delay	LOS	V/C	Delay	LOS
Route 1 and Crespi Drive		AM	0.845	13.1	B	0.846	13.1	B
		PM	0.666	8.2	A	0.666	8.2	A
Route 1 and Fassler Ave/Rockaway Beach		AM	1.223	123.0	F	1.226	124.2	F
		PM	0.877	38.3	D	0.877	38.5	D
Route 1 and Reina Del Mar Avenue		AM	1.246	110.7	F	1.248	111.5	F
		PM	1.135	83.8	F	1.138	84.6	F

Delay is average control delay in seconds per vehicle
V/C is the critical movement volume-to-capacity ratio.
LOS is Level of Service.

The addition of affordable housing units to project cumulative conditions is shown in Table 2. The affordable units with the project add 1.1 second of delay to the Route 1/Fassler Avenue/Rockaway Beach intersection during the AM. The delay is slightly higher than the 1.0 second delay for the project identified in the Draft EIR. The increase in demand-to-capacity ratio at this intersection from project traffic is 0.003 which is less than the significance threshold of 0.010. The project and affordable housing traffic would add less than one second of delay and less than 0.010 to the demand-to-capacity ratio of the other signalized intersections under

Cumulative Conditions With Project Including Affordable Housing Scenario. Therefore, the affordable housing unit's contribution to the cumulative traffic impact is less than significant.

Table 2
Intersection Levels of Service Near-Term Cumulative Conditions

Stop or Yield Controlled Intersections	Controlled Approach	Peak Hour	Cumulative Conditions Without Project			Cumulative Conditions With Project Including Affordable Housing		
			V/C	Delay	LOS	V/C	Delay	LOS
Fassler Avenue and Roberts Road	Roberts Road	AM		73.4	F		83.4	F
		PM		18.9	C		19.8	C
Fassler Avenue and Coast Lane	Coast Lane	AM		18.1	C		18.2	C
		PM		12.7	B		12.8	B
Route 1 and Coast Lane	Coast Lane	AM		36.3	D		36.6	E
		PM		12.6	B		12.6	B
Crespi Drive and Roberts Road	All-Way	AM	0.805	17.6	C	0.808	17.7	C
		PM	0.429	10.5	B	0.431	10.6	B
Roberts Road and Site Access Street	Site Access Street	AM					9.7	A
		PM					8.9	A
Signal Controlled Intersections		**Peak Hour**	**Cumulative Conditions Without Project**			**Cumulative Conditions With Project**		
			V/C	**Delay**	**LOS**	**V/C**	**Delay**	**LOS**
Route 1 and Crespi Drive		AM	0.890	15.1	B	0.891	15.1	B
		PM	0.702	8.7	A	0.703	8.7	A
Route 1 and Fassler Ave/Rockaway Beach		AM	1.301	150.0	F	1.303	151.1	F
		PM	0.940	44.4	D	0.943	44.6	D
Route 1 and Reina Del Mar Avenue		AM	1.322	134.1	F	1.324	134.9	F
		PM	1.206	104.9	F	1.209	105.7	F

Delay is average control delay in seconds per vehicle
V/C is the critical movement volume-to-capacity ratio.
LOS is Level of Service.

Comment #3-6: CC&Rs Appendix D
Response to Comment #3-6: The draft CC&Rs presented in Draft EIR Appendix D contains language that would allow a future subdivision of Lot 11 and the division of the common open space into the project lots. The applicant has removed this language from the CC&Rs (see Attachment D of this Final EIR).

Comment #3-7: Traffic Flow and Circulation
Response to Comment #3-7: The total number of AM and PM peak hour trips is identified in Draft EIR Table 9-4. Of the 8 outbound AM peak hour trips, 7 vehicle trips would exit onto Roberts Road and Fassler Avenue. Of the 9 inbound PM peak hour trips, 5 trips would return from Fassler Avenue onto Roberts Road. These traffic volumes are shown in Draft EIR Appendix G (Traffic Study) Figure 6. Remaining peak hour traffic would enter or exit the project site via Crespi Drive or directly from the project entrance at Fassler Avenue.

Project vehicles would primarily enter and exit the site from Roberts Road. The project entrance at Fassler Avenue will be a right turn in and right turn out only intersection (Draft EIR Section 9.2.4). Westbound vehicles on Fassler Avenue would be prohibited from turning left into the project and must enter through Roberts Road. The majority of AM and PM peak hour trips would occur through the Roberts Road/Fassler Avenue intersection as described above.

The proposed route of travel for non peak hour travel in and out of the project would be the same for peak hour traffic. The primary traffic pattern for the project will be use of Roberts Road and Fassler Avenue.

4. Pacificans for Sustainable Development

Comment #4-1: Our Viewpoint
Response to Comment #4-1: Commenter expresses viewpoint on development of ridgelines and preservation of open space and visual resources. No specific comments were made on the analysis or mitigation measures presented in the Draft EIR. No response is required.

Comment #4-2: Planning Process
Response to Comment #4-2: Commenter commends applicant for seeking community input into project design and expresses desire for the Conditions of Approval for this project to include comprehensive visual impact mitigations and specific and sustainable green building practices. No specific comments were made on the analysis or mitigation measures presented in the Draft EIR. No response is required.

Comment #4-3: Draft EIR and Changes in Plan
Response to Comment #4-3: Changes to the project noted by the commenter have been made by the applicant. These changes are identified in Attachment D.

Comment #4-4: Green Elements
Response to Comment #4-4: The applicant has prepared a Letter of Commitment in Attachment D in this Final EIR, which states its commitment to sustainable building principles. Some design level details for green building are still being determined. The applicant is meeting with experts who will ensure the comprehensive integration of green solutions for the project. The elements contained in Attachment D have been reviewed through this environmental review process and it has been determined that they would further reduce the project's environmental impacts. The process of formalizing more green recommendations would not affect the findings contained in the Draft EIR. Project conditions of approval would include strict design guidelines to ensure all the commitments and promises will be followed. The applicant is working to incorporate LEED standards into the project. The incorporation of LEED standards does not affect the analysis contained in the Draft EIR.

Comment #4-5: Hillside Preservation District Variances
Response to Comment #4-5: Commenter notes that project does not propose variances to the HPD zoning district and that the City should consider granting variances where they result in the ability to mitigate environmental degradation on a site such as repairing landslides or gully

erosion. No specific comments were made on the analysis or mitigation measures presented in the Draft EIR. No response is required.

Comment #4-6: Agricultural Parcel/Royce Family
Response to Comment #4-6: Both the Royce family parcel (Lots 12 and 13) and the Husson Family agricultural parcel would comply with the design guidelines of the Harmony@1 Planned Development. The Royce family parcel is within the Planned Development and subject to the project CC&Rs. The Husson family parcel is outside of the Planned Development and not subject to the project CC&Rs. However, based on the new 4,300 square foot standard set by Harmony@1 in Attachment D, the Hussons have reduced the size of their proposed residence by more than 650 feet and reduced the height of their home to below the 29 foot standard. The revised plans are presented in Attachment E. The green building design features of the Husson house is discussed in Response to Comment #3-3 III.1 above.

The size of the Husson house footprint is consistent within the HPD coverage limitations which allow up to 17,525 feet of impervious cover. The detached second residential unit in the Agricultural Parcel has been eliminated from the revised plans and incorporated into the primary structure.

The development of a second unit on the Royce properties (Lots 12 and 13) would be subject to City review and approval at the time one is proposed.

Comment #4-7: Open Space
Response to Comment #4-7: The common open space (Lot A) would be held in open space in perpetuity by the CC&Rs. No fencing of the open space is proposed. Land along Fassler Avenue which is part of the Royce family parcel (Parcel A) would be held in private open space by the property owners. Lot B (3.7 acres on the Cowan-Newton parcel) would also remain in permanent private open space. The total area designated as permanent open space is 27 acres (see Applicant's Letter of Commitment in Attachment D). This area has been slightly reduced from the 28.4 acres originally proposed in order to dedicate land for affordable housing in compliance with the City inclusionary housing ordinance.

All residential lots are sized from 1.2 to 2.7 acres with the exception of Lot 11 which is 6.4 acres (see Draft EIR Figure 4). Text on page 2-3 of the Draft EIR (Section 2.3.1) has been revised to correctly reflect these lot sizes (see Text Amendments). In response to public comment regarding compliance with the City's Inclusionary Housing Ordinance, the applicant proposes to remove acreage from Lot 11 for use in developing affordable housing. The size of Lot 11 would be reduced from 6.4 acres to 5.6 acres (see Response to Comment #3-5 and Attachment F).

The CC&Rs would allow each homeowner to have a fenced enclosure next to their home; perimeter property fencing would be prohibited. By prohibiting perimeter fencing around each lot, wildlife can move freely between the southern hillside and the lands on the north side of Fassler Avenue. The designation of land between each home as a conservation easement is not necessary to establish wildlife corridors.

All land outside of the housing lots are included in permanent open space land (Lot A and Lot B) or in private open space (Parcel A). The Fassler Avenue frontage (Parcel A) will be left undeveloped in private open space. The project does not propose development on Parcel A.

Comment #4-8: Visual Impacts – Structures
Response to Comment #4-8: Implementation of the CC&Rs would be required through Draft EIR Measure AES-1. Each lot owner would go through a specific plan approval by the City as well as a design review by the Architectural Committee of the Harmony @ 1 Homeowners Association (HOA).

The size of home analyzed in the Draft EIR is 5,500 square feet of living space and 35 feet building height (Draft EIR Section 2.3.4). In response to public comment, the maximum useable living space of the homes, including hallways, closets, and utility rooms has been reduced to 4300 square feet and the maximum building height has been reduced to 29 feet (see Attachment D of this Final EIR). These requirements will be part of the design guidelines to ensure compliance.

Visual impacts of the project are addressed in Section 4.2.2 and Section 3.2.3.1 Land Use Element of the Draft EIR. The Draft EIR concludes that the incorporation of mitigation strategies into the project design and the visual impact upon the ridgelines and surrounding areas are reduced to a less than significant level with the implementation of Mitigation Measure AES-1).

The City of Pacifica has no restrictions on the size (square footage) of homes. The applicant has proposed a size restriction of 4,300 square feet in addition to the design guidelines. Future accessory buildings on project lots would be subject to design review and approval by the City and the Architectural Control Committee of the HOA. See Response to Comment #3-3 III.A. The accessory buildings would not be included within the 4300 square foot cap. Secondary units would be prohibited on Lots 1 through 11. Secondary units permissible on Lots 12 and 13 (Royce family parcels) would be subject to City review and approval of an amendment to the lot development plan.

Comments concerning interior spaces and swimming pools/water features are noted and agreed to by the applicant. The applicant does not anticipate any tennis or basketball courts to be proposed on the lots. However, should one be presented, the feasibility of using porous surfaces would have to be further investigated.

Consistent implementation of design guidelines should be enforced by City as well as the HOA and the Architectural Control Committee.

As stated in Section 2.3.4 of the Draft EIR, the homes would be excavated into the hill to reduce their visual impact. The garages for most units will be below the homes or bermed out of sight from neighbors in Linda Mar. The homes may be seen more by those standing on Mori Point but tree landscaping will be used to help screen the homes from view.

The HOA and the Architectural Control Committee shall require consistency of materials and design elements while allowing some variation to keep homes form looking exactly alike.

The proposed Coastal Green Architecture design would be enforced by the HOA and Architectural Control Committee. Federal-style, colonial style, Victorians, or Tudor style architectural designs would not be approved for construction by the Architectural Control Committee. The proposed project design has been crafted in response to city requirements and input from the planning commission, city council, the environmental community, neighbors, and other community members. The applicant is committed to implementation of the design guidelines and maintaining the integrity of the project.

Comment #4-9: Access Roads, Retaining Wall – Visual Impacts
Response to Comment #4-9: Retaining walls would be constructed along the north side of the access road and the project entrance from Roberts Road. The access road is on the Fassler Avenue side of the property ridgeline. Project retaining walls would not be visible from southern viewpoints such as Linda Mar or Pacifica State Beach. Retaining walls would be visible from Fassler Avenue and Roberts Road. The linear road cut may also be visible from more northern viewpoints such as Mori Point. However, at this distance, project development is not highly visible (Attachment B, View 6). The applicant has committed to blending the retaining wall into the hillside by using natural colors and materials (see Letter of Commitment in Attachment D).

Draft EIR Section 4.2.3 states that portions of the development would be visible from a segment of Fassler Avenue and that the project is not widely visible from the Rockawy Beach area or from Highway 1 north of Fassler Avenue. The project would not block scenic vistas from publicly accessible areas or from other existing residential development. (Draft EIR Section 4.2.3).

Portions of the project homes, access road, and retaining walls would be visible to views from Fassler Avenue. Existing views of the project site from Fassler Avenue are shown in Draft EIR Figure 12, Photos 3 and 4. A simulated view of project structures from Fassler Avenue is shown in Attachment B, View 4. Views of the project development can be screened by planting a dense landscape buffer. The applicant has committed to planting 100 trees for screening the access road from northern views (see Letter of Commitment in Attachment D).

The Royce property lots (Lots 12 and 13) are set back from Fassler Avenue and partially screened by existing trees. Further screening of these structures would occur as a result of the additional 100 trees planted by the applicant.

In response to public comment on the Draft EIR, view simulations of the project have been provided from multiple community viewpoints. See Attachment B. The Draft EIR concludes that the visual impacts of the project can be mitigated to a less than significant level. The new simulations confirm that the project would not have a substantial adverse effect on a scenic vista and not substantially degrade the project site and its surroundings. Project alternatives need not be assessed in the same level of detail as the proposed project; hence simulated views of project alternatives are not provided. However, in response to comments, conceptual alternative site plans have been prepared by the applicant and are presented in Attachment C. The Draft EIR

analysis states that the Clustered Development Alternative could moderately increase the visual impact of the development by being located on steeper slopes rather than flatter ridgelines (see Draft EIR Section 10.5 and Response to Comment #4-16 and #5-1).

Comment #4-10: Biological Impacts
Response to Comment #4-10: Measure BIO-2 has been modified to allow tree removal only based on fire hazard, disease, safety hazard, or construction zone for project development. See Text Amendments and Response to Comment #9-19.

Measure BIO-2 states, "All trees specified for removal in Specific Plans for individual lots shall be replaced with a native species." Trees will not be replanted in the exact location of their removal since it may occur in the path of construction. The replacement location would be shown on the Specific Plan prepared at the time individual lots are proposed for development.

The long-term maintenance of heritage and screening trees has been added to the requirements of Mitigation Measure BIO-4. See Text Amendments.

Draft EIR Measure BIO-4 requires a Habitat Management and Monitoring Plan to be prepared for the open space areas of the property. Item 2 of Measure BIO-4 requires measures to protect and enhance native habitat on the site.

Draft EIR Measure BIO-6 requires the control of invasive plant species during construction and over the long-term. The control of invasive plant species has been included in the Habitat Management Program required in revised Measure BIO-4 (see Text Amendments). The use of invasive non-native plants in landscaping is prohibited by Measure BIO-5.

Comments regarding homeowner alternatives to use of pesticides and herbicides and the support of the project concept of developing special habitat areas do not pertain to the Draft EIR analysis or proposed mitigation. No response to these comments is required.

Comment #4-11: Geology
Response to Comment #4-11: The grading calculations as shown in the Draft EIR have been revised by the project engineer. A total of 15,150 cubic yards would be removed from the site, resulting in 18 haul truck trips per day over a two month period. These trips would not occur during peak hour commute periods and would not create a significant traffic impact. See Text Amendments and Response to Comment #3-3.

No repairs to the erosion gully below Lots 9 and 10 is proposed as part of the project or required as mitigation for project development. The use of excess project soil for remediation of this erosion area rather than exporting it offsite would be a separate project subject to review and approval by the City.

Comment #4-12: Hydrology
Response to Comment #4-12: Draft EIR Section 2.3.7.2 states that the proposed project includes grey water recovery incorporated into the building design for each home. The systems can be designed in a manner that successfully addresses substances such as phosphates.

Recommended guidelines for grey water recovery will be incorporated by the applicant into the Design Guidelines (Attachment D) required as a condition of project approval.

The proposed project includes rainwater harvesting at each home site. Although design level details are not provided in the Draft EIR, the concept is presented for inclusion in the environmental analysis. Each house would be constructed with a rainwater harvesting system that includes capture, storage and re-use for landscaping. A detailed plan on the type, size, and technology required for the homeowners will be incorporated by the applicant into the Design Guidelines (Attachment D) required as a condition of project approval.

The Draft EIR concludes that the stormwater runoff generated by the impervious cover on the project site would be adequately controlled through the project detention basins (Draft EIR Section 7.3, Measure HYD-2). Rainwater retention features mentioned in the comment are not proposed as part of the project design assessed in the Draft EIR. These features could be added as project enhancements to create a "model green project", however they are not required to mitigate a significant project effect.

Comment #4-13: Sustainable Development
Response to Comment #4-13: The Design Guidelines in Attachment D identifies those design elements which will be 1) Required as conditions of approval, 2) Strongly Recommended - as one of a choice of green solutions, and 3) Rough Guidelines that aim to encourage participation. Design Guidelines in Attachment D will be adopted by the City as a condition of project approval. The Design Guidelines will be binding to ensure that these project elements are implemented.

Comment #4-14: Traffic
Response to Comment #4-14: The Draft EIR states in Section 9.2.4 that the project has been designed with the project entrance on Fassler Avenue as right turn in and right turn out movements only. A barrier will prevent left turns from Fassler Avenue into the roadway for the project. Harmony@1 has six parking bays along the access road to provide for additional guest parking (see Draft EIR Figure 4). Currently, no one parks along Fassler Avenue because of inadequate shoulder width. With development, it is conceivable that some people may try to park along Fassler. There is no signage along the property frontage that prohibits parking. The City Public Works Department has added No Parking signs and red curb painting as a condition of project approval.

Comment #4-15: Inclusionary Affordable Housing
Response to Comment #4-15: See Response to Comment #3-5.

Comment #4-16: Project Alternatives
Response to Comment #4-16: Comments concerning the visual impacts of a Clustered Development alternative are noted. As stated in Draft EIR Section 10.5, a clustered development alternative would moderately increase the visibility of the project structures for the reasons noted in the comment. By locating the homes on the ridgeline where proposed, the structures can be excavated lower to decrease the building height exposed above the ridgeline. With the addition of berms placed on the project slopes, the applicant estimates that 80-85% of the building mass

will be hidden from the view of neighbors in Linda Mar. Photo simulations of the proposed project design are presented in Attachment B.

Comment #4-17: Project CC&Rs
Response to Comment #14-17: The applicant has revised the project CC&Rs to address these specific comments (see Attachment D). Implementation of the CC&Rs will be required by the City as a condition of project approval.

5. Todd Bray

Comment #5-1: Clustered Development Alternative
As stated in Response to Comment 2.1, clustered development is considered as one of the Draft EIR Alternatives (Section 10.5). Clustering the development is an alternative to the project's linear lot design along the ridgeline. As stated in the Draft EIR, there are several constraints to clustered development. Homes on a ridgeline or on flatter slopes can be excavated into the ground to reduce the visible portion of the building elevation. The flatter portions of the site most suited for development occur along the property ridgelines. Homes built on steeper slopes have more building elevation exposure along the face of the slope. A clustered design alternative which moves the homes off the ridgeline and places them as a close group on steeper slopes increases the amount of building mass visible to the community viewshed. A density bonus which allows more units would further increase the visible building mass of the clustered development alternative.

The slopes along Roberts Road are excessively steep (see Draft EIR Figure 10) which limits where home sites could be clustered. In response to public comment, the applicant has prepared alternate design concepts (see Attachment C). The Clustered Scheme design alternative would cluster small lots along Roberts Road near Fassler Avenue. The size and location of the lots would be constrained by the 500 foot maximum length of a cul-de-sac permitted by city code. Lots sizes would be roughly 5,000 square feet in size in order to accommodate the same number of units proposed by the project. This alternative increases the density of development and visual massing of building facades on the lower ridgeline closest to Roberts Road. The upper ridgeline would remain largely undeveloped with the exception being the 2-acre parcel (Lot 14) which would be visible. This design alternative does not allow the large lot single family home design proposed by the applicant and may not be financially feasible. Smaller lots have a lower sale value which may not be sufficient to generate the revenue needed for the applicant to purchase the property.

The Draft EIR concludes that with the implementation of design measures specified in Measure AES-1, the visual impacts of the proposed project are reduced to a less than significant level. In addition, the commitments made by the applicant in Attachment D will further reduce visual impacts.

Comment #5-2: Number of Units and Ridgeline Development
Response to Comment #5-2: The project consists of 3 development parcels with different owners. Eleven homes are proposed on the Cowan-Newton parcel (53 acres) and two homes are proposed on the Royce Family parcel (12 acres). Since the project application has been

submitted, the number of units on the combined 65 acres has not changed and remains at 13. The total number of residential units evaluated in the Draft EIR is 14, which includes a single family home on the 2-acre agricultural parcel. Joining these parcels into a single development application is consistent with the Planned Development zoning for these parcels.

Project homes on the large (southernmost) parcel are located along the Linda Mar side of the ridgeline as noted and will be visible to community views. A sample of the building facades facing Linda Mar is shown in Draft EIR Figure 6. The City of Pacifica allows a maximum building height of 35 feet from the lowest point of the building to the highest point of the roof. It is the applicant's stated objective to develop buildings with low profiles using partially excavated foundations and earthen berms to reduce the visible portion of the building elevations by 10 feet (see Draft EIR Section 2.3.4). Additionally, the applicant will limit the maximum building height to 29 feet (see Attachment D).

The proposed development places homes on the ridgeline in a manner consistent with the Hillside Preservation District (HPD) regulations and Design Guidelines (Draft EIR Sections 3.2.3.2 and 3.2.3.3). The HPD specifies, "It is the intent of this section to discourage the development of ridgelines; however where a parcel has ridgelines that are the only buildable portion of the property, or where it can be demonstrated that the sensitive development of other portions of such a parcel would significantly frustrate the other purposes of this article, then some development of such ridgelines may be permitted provided most of the ridgeline remains undisturbed, and any such ridgeline development is of low profile, has minimal visual impact and utilizes a minimum of grading."

The project has incorporated many design features which would reduce the visual impacts of the project. These design features are identified in Draft EIR Sections 3.2.3.1 Land Use Element, Section 4.2.2 Project Design Features). The project was designed to comply with the existing limitations of general plan policies, zoning ordinance, and HPD requirements. Each home site has been selected based on minimizing visual impact, minimizing terracing and padding, staying within the HPD calculations, HPD guidelines, fire department compliance, prominent ridgeline compliance and City of Pacifica compliance. The project design complies with the following regulations which constrain the placement of the homes on the project site:

1. HPD Calculations. Compliance with maximum coverage requirements for development on project site (Draft EIR Section 3.2.3.2 Zoning District).
2. HPD Guidelines. Conformance to HPD objectives outlined in Hillside Preservation Ordinance Section 9-4.2252. This includes avoiding padding and terracing and minimizing cut and fills, utilizing the natural topography of the hill, and preserving open space.
3. Fire Department Access. Compliance with maximum driveway length of 150 feet from access road.
4. General Plan Prominent Ridgelines. All of the homes have been placed outside the Prominent Ridgeline zone designated in the General Plan (Draft EIR Figure 10).
5. City of Pacifica Setback Requirements. Compliance with setback requirements of at least 15 feet from the property line to the front wall and 20 feet to the garage door. Due to the curves in the road, many lots are a total of 25-35 feet from the edge of the road.

6. City Design Guidelines. Project developed a "Coastal Green Architecture" style that utilizes site integration, excavation, berming, building geometry, orientation, material palette and sustainable design to minimize visibility of the homes to surrounding areas (Draft EIR Section 3.2.3.1 Land Use Element and Section 3.2.3.3 Design Guidelines).

The Draft EIR concludes that with the comprehensive strategy for minimizing visual impacts along the ridgeline will reduce the potential adverse impacts of the project to a less than significant level.

In response to public comment on the Draft EIR, a digital model of the hill with the proposed homes on it and pictures showing how these homes will be concealed from view. Photo simulations of the project from various community views are presented in Attachment B.

Draft EIR Mitigation Measure AES-2 would ensure night light and glare from the project is minimized by requiring that exterior lighting be low mounted and downward casting. Use of flood lights is prohibited and night security lighting within individual residential lots must me restricted to normal exterior lighting. The Draft EIR concludes this measure would reduce the potential night light and glare impacts to a less than significant level (Draft EIR Section 4.3).

The Draft EIR concludes that the visual impacts of the project on views of the ridgeline can be reduced to a less than significant level with incorporation of project design features (Draft EIR Section 4.3 Measure AES-1). Design Guidelines to be implemented by the project are presented in detail in Attachment D.

Comment #5-3: Building Facades and Loss of Undeveloped Ridgeline
Response to Comment #5-3: See Response to Comment #5-2. Although the City allows a maximum building height of 35 feet, the project building height would be restricted to 29 feet. With the strategic placement of earth berms, the height of visible building façade will be further reduced. Homes will remain visible on the ridgeline from community viewpoints. The Draft EIR concludes the visual impact can be reduced to a less than significant level with implementation of Mitigation Measures AES-1 and AES-2.

The applicant considered and rejected the clustered approach in favor of the proposed linear design prior to project application. A clustered design off the ridgeline moves the homes onto steeper slopes. This approach does not allow for the excavation of homes to the proposed level and implementation of the visual mitigation strategy. As stated in the Draft EIR (Section 10.5), this design alternative would moderately increase the visibility of the project structures and therefore increase the project's less than significant visual impact.

6. Bill Moore

Response to Comment #6-1: The commenter notes that the project conforms to the number of units specified by the zoning district and expresses support for the project. No concerns were raised regarding the analysis or mitigation measures contained in the Draft EIR. No response is required.

7. Jim Wagner

Response to Comment #7-1: The commenter expresses support for the project including its design into the hillside, large lots, dedicated open space, and green building features. No concerns were raised regarding the analysis or mitigation measures contained in the Draft EIR. No response is required.

8. Timothy Duff

Comment #8-1: Process
Response to Comment #8-1: The City properly circulated all documents pursuant to CEQA. The comment period on the Draft EIR does not need to be extended.

Technical studies prepared by the applicant for the Draft EIR were peer reviewed, incorporated into the Draft EIR text, and either attached to the EIR as an appendix or made available for public review at city offices. No new biological studies were conducted by the applicant during preparation of the Draft EIR. Biological studies were conducted by TRA, the EIR preparer in contract to the City of Pacifica during preparation of the Draft EIR. These field investigations occurred in Spring 2007 as documented in Draft EIR Section 5.1. The purpose of these surveys was to conduct peer review of the biological studies prepared by the applicant's consultant (WRA) and to update the studies as necessary.

The biological surveys completed after the Draft EIR was published and out for public review do not add information that changes the Draft EIR analysis of project impacts or the recommended mitigation measures. A survey for mission blue butterfly was ongoing at the time of Draft EIR publication. Half of the surveys were completed at the time of Draft EIR release in June 2007 for public comment. The findings from those surveys were incorporated into the Draft EIR analysis (pp. 5-12, 5-13, 5-25). Final surveys were completed in July 2007. The survey results had the same findings as reported in the Draft EIR. No adult mission blue butterflies were observed. Butterfly eggs were observed in the same location as identified in the previous surveys considered in the Draft EIR. A report of the mission blue surveys is presented in Attachment A.

According to CEQA Guidelines 15088.5(b), recirculation is not required where the new information merely clarifies, amplifies, or makes minor modification to an adequate EIR. Since the completed mission blue survey does not present significant new information that changes the conclusions of the impact analysis or availability of project mitigation, it does not meet the CEQA requirement for re-circulation.

Comment #8-2: Biology
Response to Comment #8-2: All biological surveys prepared by the applicant's consultant, WRA Environmental Consultants were reviewed by TRA in preparation of the Draft EIR. All special status wildlife species with potential to occur on the site are identified in Table 5-2 of the Draft EIR and described in Section 5.1.3.1. The Draft EIR documents the mission blue butterfly habitat present on the project site. Multiple surveys were conducted for mission blues between May and July. No adult mission blues were observed on the project site. Eggs observed on the site were not confirmed to be mission blue and could be from other butterfly species observed

during the surveys. Nonetheless, the Draft EIR assumed they were mission blue eggs and required a project setback from this area. See mission blue survey report in Attachment A and Response to Comment 8-1 above. As stated above, the survey report does not represent new significant information and re-circulation is not required. There is no new significant biological information outside the analysis contained in the Draft EIR.

California red legged frog (CRLF), San Francisco garter snake (SFGS), and mission blue butterfly are not known to occur on the project property. As stated in the Draft EIR Section 5.2.3.3, there is no breeding habitat for CRLF or SFGS on or immediately near the project site. While it is possible for CRLF or SFGS to traverse through the project site, the likelihood of presence is very low due to lack of nearby habitat and urban development between the project site and the closest known breeding habitats on Sweeny Ridge which can act as barriers to CRLF and SFGS movement.

U.S. Fish and Wildlife Service (USFWS) have been contacted regarding the proposed project. USFWS staff has met with a TRA biologist on the project site and USFWS has received a copy of the Draft EIR. USFWS has expressed interest in the project and has indicated in personal communications with TRA that an incidental take permit may be required. USFWS has not provided written comment on the Draft EIR or a formal determination of a permit requirement. The project is subject to state and federal laws governing special status species. Demonstration of compliance with these laws has been added as a condition of project approval (see Mitigation Measure BIO-11 in Text Amendments). This mitigation measure is not added to reduce a significant environmental impact, but merely to require compliance with existing state and federal laws regarding endangered species. The Draft EIR found that the significant biology impacts were already reduced to an insignificant level by Mitigation BIO-1 through BIO-10.

As stated above, the potential for CRLF or SFGS to occur on the project site is very low. The Draft EIR does not propose use of the exclusion fencing objected to by the commentor. Instead, the Draft EIR identifies specific measure to prevent impacts on CRLF and SFGS, measures relying primarily on monitoring by a qualified biologist (see Measure BIO-9).

Mission blue butterfly host plants occur on the project site as mapped in the Draft EIR (see Figures 16 and 18). As a result, the applicant has modified the location of the building and access driveway on Lot 11 to avoid impacting these host plants (see Figure 19). Ten surveys for the mission blue butterfly were conducted on the project site during the adult flight season when the host plants were blooming. No mission blue adults were observed on the site. Butterfly eggs were noted during surveys as reported in the Draft EIR. These eggs suggest mission blue could be present, however, these eggs could also be from other Lycaenid family butterfly species observed on the project site (see Mission Blue survey report in Attachment A).

There is no uniform setback standard applied to project sites containing mission blue host plants. The determination of appropriate buffer zones is decided on a case by case basis taking into consideration the project characteristics, quality of habitat, presence of mission blue butterflies, and proximity of plants to other known occupied host plants. A 50 foot setback from the host plants is recommended by TRA's biologist as adequate based on lack of confirmed presence of

the mission blue on the project site and the distance of 1.3 miles from the closest known population.

The Draft EIR states that the closest known population of mission blue butterflies occurs on Sweeny Ridge located 1.3 miles northeast of the project site based on information published by the National Park Service (Draft EIR p. 5-12).

Mission blue butterfly habitat would be protected by avoidance and permanent protection of the habitat in an open space area. A management plan to be prepared in accordance with Measure BIO-4 would provide for the long-term maintenance and protection of the mission blue habitat and other protected species, including the San Francisco dusky-footed woodrat, the loggerhead shrike, and the white-tailed kite. Measure BIO-4 specifies the content of the management plan which will protect the habitat. Protective measures include restriction of activities that would degrade the vegetation, cause erosion, or harass and/or harm wildlife such as 1) volunteer trails, 2) uncontrolled pets, 3) disposal of items including yard waste by residents, 4) use of rodenticides, and 5) drainage or human activity which could damage the drainage area on the eastern boundary of the project site. Additionally, the plan must specify protection goals and methods, a schedule of management and enhancement activities, annual monitoring and reporting, and an educational component.

In addition to implementation of Measure BIO-4, impacts to the white-tailed kite are avoided through pre-construction surveys for nesting birds required in Measure BIO-7. The project would not substantially diminish the foraging and nesting opportunities for special status bird species and therefore the project's impact on special status birds is not significant (Draft EIR p. 5-24).

Comment #8-3: Aesthetics and Lot 11
Response to Comment #8-3: The threshold for determining whether a project has a significant visual impact is not whether it is visible, but whether it substantially degrades the visual character of the site and its surroundings or have a substantial adverse effect on a scenic vista (e.g., exceeds significance criteria) (Draft EIR Section 4.2.1). While the proposed project homes would be constructed along a highly visible ridgeline, the applicant has incorporated a comprehensive visual mitigation strategy into the project design that includes excavation, berming, siting, building geometry, colors, compliance, flat roofs, sod roofs, sustainable design, landscaping, elimination of perimeter fencing, and numerous other components to make sure the visual impact of the homes is minimized. The Draft EIR concludes that these design elements and mitigation measures reduce the visual impact of this development to a less than significant level.

Lot 11 is below the prominent ridgelines on the property and does not impact the natural contour line of the higher elevation ridgeline. Sweeny Ridge and Mori Point are located roughly one mile away from the project site. At this distance, project development, including Lot 11, would not be highly visible. The project would not substantially affect a scenic vista. A view of the project site from the Pacifica State Beach parking lot is shown in Draft EIR Figure 12, Photo 8. Development on Lot 11 would be visible from this viewpoint. Photo simulations of the project from Mori Point and Linda Mar Beach are shown in Attachment B and confirm the conclusion

that the view of the natural ridgeline would not be substantially altered. Elimination of Lot 11 is discussed in the Draft EIR as a project alternative (Section 10.4). This discussion concludes that elimination of Lot 11 would only slightly reduce the project's visual impacts.

Comment #8-4: General Plan/Land Use Zoning
Response to Comment #8-4: The Hillside Preservation District (HPD) restricts the amount of development that may occur on the property based upon a slope density formula that factors in the steepness of project slopes. The HPD encourages clustering to preserve larger areas of open space and maximum retention of natural topographic features. The HPD also recognizes that ridgelines may be the only buildable portion of the property. Ridgeline development can be permitted provided that it is low profile, has minimum visual impact and utilizes minimum grading (Draft EIR Section 3.1.2.2). Project conformance with the Hillside Development standards of the City Design Guidelines is detailed in Draft EIR Section 3.2.3.3. Elimination of Lot 11 is not necessary for project compliance with the Hillside Preservation District requirements.

Comment #8-5: Reduced Lot Alternative
Response to Comment #8-5: Elimination of Lot 11 does not substantially reduce the visual impacts of the project. As described in Draft EIR Section 10.3, visual impacts of the project can primarily be reduced by eliminating project lots along the upper ridgeline. Lot 11 is less visible to community views than Lots 2 through 10 and the 2-acre parcel along the ridgeline. Lot 11 is at a lower elevation on the slope below the southernmost prominent ridgeline. From southern views such as San Pablo Avenue (Draft EIR Figure 12, Photo 12) and Highway One (Figure 12, Photos 7 and 8), the development on Lot 11 would be visually contiguous to the commercial development on Crespi Avenue and the townhomes on Roberts Road.

9. Karen Rosenstein

Comment #9-1: Visibility of Project
Response to Comment #9-1: The Draft EIR acknowledges the high visibility of the six acres proposed for project development (Draft EIR Sections 3.2.3, 4.1.2, 4.1.5, 4.2.3). The project property contains designated Prominent Ridgelines. The City has General Plan policies, zoning ordinance requirements, and design guidelines to protect these ridgelines and minimize visual impact from development (Draft EIR Sections 3.1.2.1 through 3.1.3.3, and Section 4.1.5.). Design features have been incorporated into the project to mitigated adverse visual impacts to ridgeline views. These features are described in Draft EIR Section 3.2.3 under the Land Use Element discussion and in Draft EIR Section 4.2.2 Project Design Features. The Draft EIR concludes that these features would result in low profile homes which would minimize the visibility of the homes on the ridgeline and reduce the visual impact to a less than significant level. Additionally, as a result of comments raised during the Draft EIR process, the applicant has proposed reducing the size of the homes from 5500 to 4300 square feet and limiting the building height to 29 feet. See Attachment D.

The placement of the building envelopes has been guided by numerous constraints, including respect of the property line boundary between the two project parcels (APN 022-150-310 owned by the Royce family and proposed as Lots 12 and 13, and APN 022-150-420 owned by Cowan

Newton and proposed as Lots 1-11), minimum and maximum building setbacks from the road and property line edges, HPD coverage limitations, design guidelines, and Prominent Ridgeline designations. In the proposed locations, homes would be excavated to lower the height of building face exposed on the hillside. Addition design features incorporated into the project in order to reduce project visibility include the use of berming, siting, building geometry, colors, compliance, flat roofs, landscaping, and elimination of perimeter fencing.

Comment #9-2: Subdivision
Response to Comment #9-2: Yes, the proposed project is a subdivision for development of custom homes. The proposed Planned Development includes the subdivision of two separate parcels of land (APN 022-150-310 and 022-150-420) into 13 residential lots and 3 open space parcels (Lot A, Parcel A, and Lot B).

Comment #9-3: Home Size
Response to Comment #9-3: In response to public comments on the Draft EIR, the applicant has reduced the maximum home size from 5500 square feet to 4300 square feet. The maximum building height will be limited to 29 feet which is less than the permitted maximum height of 35 feet (See Attachment D). These limitations on building size will further reduce the visual impact of the project.

Comment #9-4: Grading Plan
Response to Comment #9-4: A grading plan has been prepared for the road only. Each homeowner will provide a specific grading plan once they submit their plans for approval with the city. The extent of grading disturbance proposed on these individual lot grading plans would not exceed the building envelopes specified on the project Grading Plan (Draft EIR Figure 7) and assessed in the Draft EIR. Also see Response to Comment #3-1.

It is not clear from the comment what "unstable soil" means. Draft EIR Section 6.2.6 identifies surficial landslide areas along Roberts Road which are outside of the proposed development area. These areas will be remediated through additional grading as specified in Measure GEO-2.

Comment #9-5: Community Views from North
Response to Comment #9-5: In response to specific suggestions raised by community members during the public review of the Draft EIR, the applicant has agreed to plant more than 100 trees along the Fassler side of the project to help screen the homes from view. Also landscaping will be directly integrated into the retaining walls. Although the Draft EIR concludes that the visual impacts have been mitigated to a less than significant level, the applicant has committed to planting additional screening trees and landscaping of retaining walls to further reduce visual impacts of the project. See Letter of Commitment prepared by the applicant in Attachment D.

There are numerous trees that will remain that can act as a shield to the Quarry and Mori Point. Photo simulations of the project from Mori Point and Linda Mar Beach are shown in Attachment B. The Quarry is private property zoned for commercial use. Since it is not a community viewpoint, no photo simulations from this location have been prepared. The view from the Quarry would be similar to the view from Mori Point which is shown in Attachment B.

Comment #9-6: Visual Impact of Street and Night Lighting
Response to Comment #9-6: The project road will be sited on the Fassler Avenue side of the ridge (see Grading Plan in Draft EIR Figure 7) and therefore more visible from areas north of the site than from Linda Mar. The applicant has agreed to plant 100 trees to screen the road and homes from northern views. See Response to Comment #9-5 above.

Mitigation Measure AES-2 requires night lighting to be controlled to minimize adverse visual impacts. Low light polluting street lights will be used to minimize nighttime glare. The applicant has prepared a lighting mitigation plan and is working with an architect and a light specialist to create specific strategies to minimize any light from the homes or the hill.

Comment #9-7: Retention Ponds
Response to Comment #9-7: The detention ponds will be accessible to non-residents. However, as stated in the Draft EIR (Section 7.2.2.2), the ponds have a shallow design (3 to 5 feet deep) and will completely drain within 48 hours. Therefore, it is not anticipated that the ponds would create a public attraction. The ponds are intended for storm water control and are not intended to serve as design feature for residents (or non-residents) to use.

Comment #9-8: Vacant Land
Response to Comment #9-8: The word "vacant" has been changed to "undeveloped." Please see Text Amendments.

Comment #9-9: Traffic Impacts
Response to Comment #9-9: The traffic study evaluated the sight line distances for Lot 11 driveway along with the project road. Lot 11 meets the minimum safety standards for sight line distances and does not require mitigation.

The project road intersection with Fassler Avenue will be configured for right turn in and right turn out movements only (Draft EIR Section 9.2.4). Vehicles cannot turn left from Fassler Avenue onto the project road. Access will be restricted through a median at the project entrance.

The determination of whether a traffic increase is significant is based on significance thresholds used by the City of Pacifica (Draft EIR Section 9.2.1). Based on these thresholds, the project's contribution of 11 trips during the A.M. peak hour and 14 trips during the P.M. peak hour to LOS F intersections on Highway One would increase the delay at these intersections by approximately one second. Thus, the project traffic increase would not noticeably worsen the traffic congestion at these intersections. See also Response to Comment #9-18 below.

Comment #9-10: Agricultural Parcel
Response to Comment #9-10: Development of the 2-acre agricultural parcel is a separate development application from the Planned Development project. Combining access for the 2-acre parcel with the 13-lot Planned Development ensures that only one road connects to Fassler Avenue. The owners of the 2-acre parcel have agreed to abide by the design guidelines for the Planned Development project. They have reduced the size of the parcel development by eliminating the detached second unit and incorporating it into the primary structure (See Attachment E). The development on the 2-acre parcel would comply with the 4300 square foot

limitation on living space and the 29 feet height restriction specified for the Planned Development. The actual height of the proposed home on this lot is 26 feet (see Attachment E). The house would be designed as a Sunset Breezehouse which integrates green building technology into the home such as solar panels, collection of rain water in a below ground cistern, flat roofs, exterior sustainable materials, water conserving landscaping, and grey water recycling. Also see Response to Comment #3-3 III.1.

Comment #9-11: Green Coastal Architecture and Natural Contours
Response to Comment #9-11: In order to minimize visual impact, homes will be excavated to lower the profile visible from offsite locations. Building into the hill and using berms reduces the visibility of the homes and blends the homes into the hillside. The homes are all designed to follow the topographical patterns of the hill. Building architecture has been designed to conform to the hill through flat roofs, living roofs, excavation, berming, and use of natural colors. These measures reduce the visual impact of the homes along the ridgeline.

The project design is "environmentally friendly" in that it incorporates green building strategies (Craft EIR Section 2.3.7). See design features listed in Design Guidelines presented in Attachment D. In addition, the applicant has committed to working with a certified LEED expert to incorporate LEED standards into the project design (see Letter of Commitment in Attachment D).

Comment #9-12: Lot 11 Elevation
Response to Comment #9-12: Draft EIR Sections 2.1.3 and 4.1.1 state that the low site elevation is 36 feet. Draft EIR Section 6.1.2 states the low elevation is approximately 40 feet grade. The 40-foot elevation is an approximation. The 36-foot elevation is more accurate.

Comment #9-13: Police and Fire Services
Response to Comment #9-13: According to police and fire department staff (Draft EIR Sections 8.1.2 and 8.2.2), fire and police have adequate staffing and emergency response times to serve the proposed project.

Comment #9-14: Recreational Use of Property
Response to Comment #9-14: The project property is privately owned. It is used informally by locals for passive recreational purposes. Although the project site will retain 27 acres in natural open space for its residents, the property is not intended to be used by the public for recreational purposes. Developing a paved street for housing will not make it easier for four wheelers, motocross riders, or walkers to access this open space area. Pedestrians wanting to access the site could do so from any point along Roberts Road without use of the new project access road. A retaining wall along the access road would not permit vehicle access from the road into the open space area. Since the project would not create a public recreation area, the need for increased police services is unlikely and speculative.

Comment #9-15: Fassler Avenue
Response to Comment #9-15: The Draft EIR states that Fassler Avenue goes through the project study area (Draft EIR Section 9.1.1). The traffic study area is larger than the project site

and includes the road network in the surrounding area. Fassler Avenue is a four lane arterial in project study area. Fassler Avenue passes through the study area adjacent to the project site.

Comment #9-16: Copeland and Ebken Traffic Counts
Response to Comment #9-16: When RKH Transportation Engineers conducted the traffic counts for the study area intersections they counted Fassler/Coast Lane and Fassler/Rockaway/Hwy 1 intersections. The traffic added from Copeland and Ebken shows up in the counts for Fassler/Rockaway/Hwy 1. The Coast Lane intersections were included because some Fassler traffic uses Coast Lane as a short cut to Highway 1 in the morning peak traffic period.

Comment #9-17: Incremental Traffic Increases
Response to Comment #9-17: Small increases in traffic, if continual, can add up to significant increases. For this reason, the traffic analysis assesses the project's impact by looking at both the project's contribution to the existing conditions and cumulative development conditions which considers community growth. The intersections on Highway One have poor operating levels during peak commute hours. The number of traffic trips added to these intersections during the congested peak hours is not large enough to significantly impact the performance of the intersection based on the city's thresholds of significance (Draft EIR Section 9.2.1). The Draft EIR assesses the impacts of future foreseeable development in the project vicinity and concludes that the cumulative impact is not significant (Draft EIR Section 9.2.5).

Comment #9-18: Measure #9-18: Measure BIO-2 is intended to prevent unnecessary removal of trees from project lots by homeowners. Homeowners should be able to remove dead, substantially dead, or structurally unsafe trees. The measure should balance a homeowner's desire for an attractive landscape with recognition that trees in any condition offer wildlife values. This condition is initially enforceable through the building permits issued by the City of Pacifica and then through CC&Rs after construction is complete. Revised language to the mitigation is provided in Text Amendments changing the condition of tree removal from visual blight to the health of the tree.

Comment #9-19: Replacement Trees
Response to Comment #9-19: All Heritage trees that have to be removed will be replaced with large specimen trees as recommended by the project arborist. Trees will be planted with native species in accordance with Measures BIO-2 and BIO-3. The HOA will have a comprehensive plant and habitat management plan prepared in accordance with Measure BIO-4. Maintenance of the trees planted as project mitigation has been added to Measure BIO-4. The HOA will be responsible for watering these trees through an irrigation system or other means such as hand spraying if an irrigation system is not desirable. See Section 3, Text Amendments.

Comment #9-20: HOA
Response to Comment #9-20: Homeowners will be responsible for the maintenance of their immediate yards. Open space areas will be maintained by the Homeowners Association through contracted landscape crews. The applicant is aware of the potential expense. Measure BIO-4 requires maintenance of the open space areas to occur in accordance with a habitat management plan which includes control of invasive exotic plant species (see Section 3, Text Amendments).

Comment 9-21: Ridgeline View
Response to Comment #9-21: The property ridgelines are recognized as a scenic resource to the Pacifica community. Project impacts to this resource are discussed in Draft EIR Land Use and Aesthetic Chapters (see Sections 3.2.3.1 and Section 4.1.5). The property is designated for residential use by both the General Plan and zoning ordinance and the proposed project complies with the density requirements and coverage limitations of those designations. Design mitigations have been integrated into the project to minimize visual impact. The project homes will remain partially visible. However, visibility does not necessarily equate to significantly degraded views of the ridgeline. Thresholds of significance used in the Draft EIR analysis are presented in Section 4.2.1. Although the project has the potential to degrade the scenic quality of the natural ridgeline, the Draft EIR concludes that the design features of the project and the Mitigation Measure AES-1 and AES-2 are sufficient to reduce the impact to a less than significant level.

Comment #9-22: 2-Acre Parcel
Response to Comment #9-22: See Response to Comment #9-10 and Response to Comment #3-3 III.1.

10. Graham Brew

Comment #10-1: Impact to Ridgelines
Response to Comment #10-1: The project homes would be developed along the property ridgelines. The Draft EIR concludes that integration of the design features proposed by the applicant would reduce the visibility of the homes and that the overall impact to the scenic quality of the ridgeline would be reduced to a less than significant level. For more discussion and responses related to the impact along the ridgeline, please see Responses to Comments #4-8, #4-9, #4-16, #5-2, #5-3, #9-1, #9-5, and #9-21.

Comment #10-2: Visual Impact
Response to Comment #10-2: The project has incorporated design features as analyzed in the Draft EIR (Section 3.2.3.1) which would reduce the size of the building façade visible to community viewpoints. These features include reducing the maximum building height from 35 to 29 feet, reducing the building size from 5500 to 4300 square feet, excavating the building foundation to lower building elevations, and use of earthen berms to screen buildings. See Attachment D for project Design Guidelines and Attachment B for view simulations of the project. The project homes would remain visible on the ridgeline. However, the Draft EIR concludes that the incorporation of project mitigation would reduce the visibility of the homes and reduce the visual impact on the ridgeline to a less than significant level (Draft EIR Section 4.3).

Comment #10-3: Lot 11 Visibility
Response to Comment #10-3: Lot 11 occurs on the lower elevations of the project property. The primary visual impacts of the project occur on the upper ridgeline. See Response to Comment #8-3.

Oral Comments Received at the City of Pacifica Planning Commission Meeting, July 2, 2007

11. Nancy Hall

Comment #11-1: Visual Impacts
Response to Comment #11-1: See Response to Comment #9-1 above.

12. Karen Rosenstein

Response to Comment #12-1: See Response to Comment Letter #9 above.

13. John Curtis

Comment #13-1: Height Limits, Second Units, Visual Impact, Open Space
Response to Comment #13-1: Height restrictions, seconodary units, and exterior materials and colors are addressed in the applicant's Letter of Commitment and Design Guidelines presented in Attachment D. The applicant proposes a 29 foot height limit and has eliminated language from the CC&Rs permitting second units on Lots 1 through 11 lots and possible future subdivision of the common open space (Lot A). The Royce family retains its right for second units on Lots 12 and 13. Control of the building materials and colors are included in the CC&Rs and required in Mitigaiton Measure AES-1. The Draft EIR analysis concludes that the design controls would reduce the visual impacts of the project to a less than significant level.

14. Commissioner Leon

Comment #14-1: 2-Acre Parcel
Response to Comment #14-1: The 2-acre parcel is not included in the Homeowners Association. However, the lot development has been designed to conform to the design principles of the Planned Development. See Response to Comment #9-23.

Comment #14-2: Building Envelope and Grading Plan
Response to Comment #14-2: The EIR addresses two project applications – a Planned Development on 65 acres for 13 residential lots and open space parcels and a single family residence on a 2-acre agricultural parcel. The tentative map and site development plan for the project includes grading for the project access road which is common to all lot development. The current grading plan shown in Draft EIR Figure 7 does not include the slope trimming needed to improve sight line distances at the project road intersections with Fassler Avenue and Roberts Road. The grading plan will be modified to provide adequate sight line distances in accordance with mitigation Measure TRF-1.

See Response to Comment #3-1 regarding grading information for sight line distances.

Comment #14-3: CC&Rs
Response to Comment #14-3: See Response to Comment #3-6.

Comment #14-4: General Concerns
Response to Comment #14-4: See Response to Comment #3-5 regarding inclusionary housing.

See Response to Comment #9-1 regarding visual impacts along the ridgeline.

See Response to Comment #5-3 and 9-6 regarding night lighting.

See Response to Comment #9-9 regarding Fassler Avenue/Project Road circulation.

See Response to Comment #3-2 regarding grading for project road.

See Attachment B for photo simulations.

Comment #14-5: Agricultural Parcel
Response to Comment #14-5: The development plans for the agricultural parcel have been revised and are submitted in Attachment E. The plans have been changed to conform to the maximum size and height restrictions proposed for the Planned Development project.

The development of a 2-acre parcel is a separate from the Planned Development project and is proposed by a different owner under a separate development application. Both projects are evaluated in the Draft EIR.

See Response to Comment #3-3 regarding visual impacts of the 2-acre parcel.

See Response to Comment #9-10 and #9-23.

15. Commissioner Cicerone

Comment #15-1: General Concerns
Response to Comment #15-1: See Response to Comment #3-6 regarding CC&R language changes.

See Response to Comment #3-5 regarding project provision of inclusionary housing.

See Response to Comment #5-1 regarding clustered development alternative and Response to Comment #8-5 regarding a reduced lot alternative. Alternative development plans are presented in Attachment C.

Comment #15-2: Ridgeline Protection
Response to Comment #15-2: Comments state that project approval was not automatic and that there is more to the project than meeting HPD requirements. It is also about protecting the ridgeline but the whole feeling of the mountain. Comment also states that second residential

units are fine in some places and not in others. No specific comments were made on the analysis and mitigation measures contained in the Draft EIR. No response is required.

See Response to Comment #3-6 regarding second units.

16. Commissioner Nathanson

Response to Comment #16-1: See Response to Comment #91 regarding building on ridgeline.

See Response to Comment #5-1 regarding a clustered development and reduced lot project alternatives. Alternative development plans are presented in Attachment C.

See Response to Comment #3-5 regarding inclusionary housing.

See Responses to Comments #4-8, #4-9, #4-16, #5-2, #5-3, #9-1, #9-5, and #9-21 regarding visual impacts.

The proposed project road intersects Roberts Road at a curve which limits the sight line distances for vehicles exiting the project road onto Roberts Road (Draft EIR Section 9.2.4). For roads with vehicle speeds of 30 mph, the minimum safe stopping distance is 200 feet. A safe stopping distance of 330 feet is recommended. The proposed road would have minimum sight distances of 200 to 250 feet which meets the minimum standard. The hillside at the project road entrance would need to be trimmed level with Roberts Road in order top increase the sight line distances above the minimum safety standard. Mitigation Measure TRF-1 requires that the hillside be trimmed to increase the sight distance beyond the 200-foot minimum safety standard as much as feasible. A grading plan for the sight distance improvement would be submitted with the Final Grading Plan for the project road to the City for review and approval.

See Response to Comment #3-# I.B2 regarding dimensions of hillside affected by sight triangle grading.

Measure BIO-2 and Measure BIO-3 require that trees removed from the site be replaced with native species. The measures do not specify a minimum size requirement. Seven Heritage trees would be removed from the road and building areas (Draft EIR Section 5.2.2.4). The applicant would replace Heritage Trees with 24” or 36” box trees (Attachment D).

17. Commissioner Campbell

Response to Comment #17-1: The project will integrate LEEDS standards based on professional advice from a LEEDS certified expert (Attachment D).

See Responses to Comments #4-16, #5-1, and #8-5 regarding clustered and reduced lot development alternatives.

See Response to Comment # #4-8, #4-9, #4-16, #5-2, #5-3, #9-1, #9-5, and #9-21 regarding visual impacts of building on the ridgeline.

See Response to Comment #3-3 III.B and #9-5 regarding views from the Quarry.

18. Commissioner Maykel

Response to Comment #18-1: See Responses to Comments #4-8, #4-9, #5-2, #5-3, #9-1, #9-5, and #9-21 regarding ridgeline impacts. Visual impact of street is addressed in Response to Comment #9-6.

Alternative designs which move the houses off the ridgeline are discussed in Responses to Comments #4-16, #5-1, and #8-5. Alternative design concepts are shown in Attachment C.

Draft EIR analysis concludes that impacts to sensitive biological species can be reduced to a less than significant level. Mitigation measures are included to address the issue of non-native invasive species. Measure also addresses protection and enhancement of native grasslands (coastal prairie) through a habitat management program required in Measure BIO-4.

Pervious and impervious surfaces are summarized in Response to Comment #3-2. The project road will be an impervious asphalt surface.

19. Commissioner Ranken

Response to Comment #19-1: As noted, the project complies with HPD coverage limits and does not propose any variances.

The applicant is pursuing LEEDs certification. See Response to Comment #4-4.

The applicant has designed the project to minimize visibility of project structures from community views of the ridgeline. The Draft EIR concludes that while the project would be visible, the adverse visual impacts have been mitigated to a less than significant level.

3.0 TEXT AMENDMENTS

In response to comments, some changes have been made to the EIR text. The changes correct inaccuracies and clarify the analysis in the Draft EIR. Where text in the Draft EIR has been deleted, the text is marked with ~~strike-out~~. Underlined text represents new text that is added to the Draft EIR.

Page S-1, third paragraph
The Roberts Road/Harmony@1 EIR identifies potentially significant impacts related to ~~hazardous waste, traffic, air quality, and noise~~ aesthetics, biology, geology, hydrology, and traffic. ~~With the exception of traffic, all~~ All impacts can be mitigated to a Less than Significant level. Table S-1 summarizes all significant impacts and the recommended mitigation to reduce impacts.

Page 2-1, first paragraph
The City of Pacifica has received an application to develop 13 single family residential homes on 65 acres and the development of one single family home with a second unit on an adjoining two-acre lot. The project is located on ~~vacant~~ undeveloped hillside property in Linda Mar south of Fassler Avenue at Roberts Road.

Page 2-1, last paragraph
The project parcels are ~~vacant land. There has been no previous developed use of the project property.~~ undeveloped.

Page S-3, Table S-1
Page 5-28, Measure BIO-2
Measure BIO-2: In order to provide continued wildlife values on the project site, trees in designated open space areas (Lot A, Lot B, and Parcel A) shall not be removed. Tree removal on individual lots shall be approved only upon demonstration that 1) the tree is within the designated building envelope and removal is required for construction, 2) the tree is close to the building envelope and its condition represents a safety or fire hazard to the proposed residence, or 3) the ~~location and condition of the tree would create a visual blight when viewed from the residence~~ tree is substantially dead (at least 50%) as determined by a certified arborist or if visually apparent. Homeowners shall be encouraged to retain impaired trees where there is no impact to use and enjoyment of property. Conditional tree removal would prevent unnecessary reductions in wildlife resources on the site while protecting the safety and enjoyment of property by landowners. All trees specified for removal in Specific Plans for individual lots shall be replaced with a native species.

Page 3-3, Table S-1
Page 5-28, Measure BIO-4
Measure BIO-4: ….In addition, through consultation with City of Pacifica, U.S. Fish and Wildlife Service and the California Department of Fish and Game, a Management and Monitoring Plan shall be developed and implemented for the open space areas. The Plan shall include the following:

1. A description of the goals of the Management Plan. The goals should foster the protection of native habitat and wildlife diversity at the site, should protect the wildlife corridor, and should support a healthy ecosystem.
2. A description of methods to protect and enhance native habitat on the site, including coastal terrace prairie, coastal riparian scrub, and northern coastal scrub. A program to control exotic invasive plant species shall be included in these methods.
3. A description of the methods to protect and enhance habitat of sensitive species on the site, including the Mission blue butterfly, the San Francisco dusky-footed woodrat, the loggerhead shrike, and the white-tailed kite, and how individually-owned lots with restriction on them (see Measure BIO-10) may fit into the scheme.
4. A schedule of management and enhancement activities. Management activities shall address open space habitat areas and include routine maintenance and care of replacement and screening trees planted as part of the project.
5. Annual monitoring and reporting, including surveys of the species of concern and the results of any enhancement activities undertaken at the site.
6. An educational component, so that lot owners understand the purpose of the management plan and can choose to apply the measures to their own lots.

The applicant or homeowner's association shall request a letter of concurrence from the U.S. Fish and Wildlife Service that the management plan will not result in take of the Mission blue butterfly or any other federally-listed species.

Page S-6, Table S-1
Page 5-30, Measure BIO-8
Measure BIO-8: …3. Control of non-native species. The management of the onsite common open space area (Lot A) per Measure ~~BIO-5~~ BIO-4, shall include….

Page S-7, Table S-1
Page 5-32, New Mitigation after Measure BIO-10
Measure BIO-11: The applicant shall obtain all necessary permits from California Department of Fish and Game and U.S. Fish and Wildlife Service as required by federal and State law to avoid, minimize, or offset impacts to any species listed under either the State or federal Endangered Species Acts or protected under any other State or federal law. Evidence that the applicant has secured any required authorization from these agencies shall be submitted to the City of Pacifica Planning Department prior to issuance of any grading or building permits for the project.

Figure 19, Mitigated Alternative Design for Lot 11
The legend on this Figure is corrected to indicate buffer zone depicted on graphic is 50 feet, not 20 feet as shown. Revised Figure 19 is attached.

Page 2-3, Section 2.3.1, first paragraph
The Project Applicant proposes a Planned Development on two parcels (APN 022-150-420 and APN, 022-150-310) comprising 65 acres. The parcels would be subdivided into 13 single family residential lots ranging in size from ~~1.8~~ 1.2 acres to ~~8.7~~ 6.4 acres (Figure 4, Tentative Map).

Page 2-5, Section 2.3.5, second and subsequent paragraphs

Construction of the project access road would require site grading (Figure 7, Grading Plan). The proposed road grading would consist of maximum cut heights of ~~12~~ 14.5 feet and fill heights up to ~~7~~ 7.6 feet. Retaining walls would be constructed along the south side of the project road between lot driveways. The estimated earthwork quantities are ~~27,918~~ 20,152 cubic yards of cut and ~~4,573~~ 5,002 cubic yards for fill. The excess quantity of ~~23,616~~ 15,150 cubic yards, would be removed from the site.

~~The hillside slopes at the project road entrance to Roberts Road would also be trimmed back to increase sight line distances for motorists leaving the project site (Figure 7).~~

A retaining wall ranging in height from two to eleven feet would be constructed along the entire length of the access road on the south side and partially on the north side (Figure 8, Preliminary Retaining Wall Plan). This includes the entrance to the access road at Roberts Road.

The slope along the east side of Roberts Road south of the access road would be trimmed to improve site line distances for motorists leaving the project site (Figure 8). To provide for 215 feet of sight distance to the east (towards Fassler Road), approximately 2,250 square feet of minor grading would be required resulting in approximately 150 cubic yards of cut. To provide for 240 feet of sight distance to the west (towards Crespi Drive), approximately 3,220 square feet of minor grading would be required resulting in approximately 120 cubic yards of cut.

Two shallow retention ponds proposed to control stormwater runoff would require minor excavation. The pond near Roberts Road requires an average excavation of 5.5 feet with a total excavation volume of 635 cubic yards. The retention pond at the project entrance on Fassler Avenue requires an average excavation of 1.5 feet with a total excavation volume of 149 cubic yards.

The total grading quantity required for the entire project (project road, sight distance, and retention ponds) is estimated to be 21,206 cubic yards of cut and 5,002 cubic yards of fill. The net balance of 16,204 cubic yards of cut would be removed from the project site.