

RESPONSE TO COMMENTS

This Response to Comments document contains agency comments received during the public review period of the 505 San Pedro Avenue project (proposed project) Initial Study/Mitigated Negative Declaration (IS/MND).

BACKGROUND

The City of Pacifica Planning Department, as lead agency, released the IS/MND for public review beginning on April 4, 2018 and ending on May 3, 2018, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15105. The IS/MND and supporting documents were made available at the public counter of the City of Pacifica Planning Department located at 1800 Francisco Boulevard, Pacifica, California 94044, and also online at the City’s website at <http://www.cityofpacifica.org>. According to CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the negative declaration. However, unlike with an Environmental Impact Report, comments received on a negative declaration are not required to be attached to the negative declaration, nor must the lead agency make specific written responses to public agencies. Nonetheless, the lead agency has chosen to provide responses to the comments received during the public review process for the IS/MND.

LIST OF COMMENTERS

The City of Pacifica received two comment letters during the open comment period on the IS/MND for the proposed project. The comment letters were authored by the following representatives of the State and local agencies noted:

- Letter 1 Patricia Maurice, Department of Transportation
- Letter 2 Patrick Foster, California Coastal Commission

RESPONSE TO COMMENTS

The Response to Comments below includes responses to the comment letters submitted regarding the proposed project. The letters are numbered and bracketed with assigned comment numbers. The bracketed comment letters are followed by numbered responses corresponding to each bracketed comment. Where revisions to the IS/MND text were made, new text is double underlined and deleted text is ~~struck through~~.

Letter 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
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APR 24 2018

City of Pacifica

April 24, 2018

SCH #2018042010
GTS # 04-SM-2018-00167
GTS ID: 10097
PM:SM - 1 - 40.954

Robert Smith, Associate Planner
City of Pacifica
170 Santa Maria Avenue
Pacifica, CA 94044

505 San Pedro Avenue Project – Mitigated Negative Declaration (MND)

Dear Mr. Smith:

1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 505 San Pedro Avenue Project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the April 2018 MND.

1-2

Project Understanding

The proposed project would include the demolition of the on-site half-pipe feature and the construction of three buildings: a two-story surf shop building with a storage basement (Building #1), a skatepark with an associated two-story storage area (Building #2), and a two-story mixed-use building with retail on the ground floor and two residential units on the second floor (Building #3). In addition, the project includes a parking lot with 25 uncovered spaces and two covered spaces, as well as associated infrastructure, pedestrian walkways, and landscaped areas. Regional access to the project site is provided by State Route (SR) 1, via San Pedro Avenue.

1-3

Scenic Highway Eligibility

As noted in the visual analysis, this section of SR 1 is an Eligible State Scenic Highway. Scenic highway designation is dependent on the extent of the natural landscape visible to travelers, the scenic quality of the landscape, and the degree to which development impinges upon the traveler's enjoyment of the view. A local governing body may attain official designation through an application process and adoption of a Corridor Protection Plan. A Corridor Protection Plan

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

**Letter 1
Cont'd**

Mr. Smith, City Pacifica
April 24, 2018
Page 2

**1-3
Cont'd**

includes regulation of land use and density of development, detailed land and site planning, and the design and appearance of structures.

The proposed structure is visible from the highway. While there is commercial development in the foreground of views to the hills from the highway, the existing buildings are only single-story. The proposed building is taller and visible above the existing development. Consequently, this visibility could be considered a new visual intrusion in the natural landscape that may affect future application for scenic highway status. Also given that the new structure is within the view from an eligible scenic highway, the use of architectural elements, colors and or textures that complement this setting would be an appropriate visual minimization measure.

1-4

Lead Agency

As the Lead Agency, the City of Pacifica is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

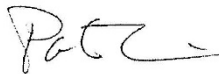
1-5

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or jake.freedman@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

**LETTER 1: PATRICIA MAURICE, DEPARTMENT OF TRANSPORTATION, DISTRICT 4,
APRIL 24, 2018**

Response to Comment 1-1

The comment is an introductory statement and does not address the adequacy of the IS/MND.

Response to Comment 1-2

The comment provides a brief summary of the project description and does not address the adequacy of the IS/MND.

Response to Comment 1-3

As indicated in the IS/MND and acknowledged by the commenter, the segment of State Route 1 in the project vicinity is not an officially designated scenic highway. The eligibility status of this segment of SR 1 is important to the City. Notwithstanding this, as shown in the post-project visual simulation contained in the IS/MND (see Figure 10), the increased height of the proposed structure, while visible from SR 1, would not represent a substantial intrusion in the natural landscape. The foreground views from SR 1 are currently dominated by the existing shopping center, not natural landscapes, as would continue to be the case with implementation of the proposed project.

In addition, as discussed on page 23 of the IS/MND, the project would be required to comply with the City of Pacifica Design Guidelines, which are used by the City's Planning Commission and planning staff when reviewing and evaluating the design of all new development within the City. Compliance with the Design Guidelines would ensure that the visual quality of the area would not be degraded. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.

Response to Comment 1-4

The mitigation measures prescribed for environmental effects described in this IS/MND will be implemented by the City of Pacifica, as CEQA lead agency, in conjunction with the project, as required by CEQA. The mitigation measures will be incorporated into the project through project conditions of approval. The City will adopt findings and a Mitigation Monitoring and Reporting Program for the project in conjunction with approval of the project.

As discussed in Section XVI, Transportation and Circulation, of the IS/MND, Abrams Associates Traffic Engineering determined that the proposed project would not cause any of the study intersections to exceed any applicable City, County, or State standards.¹

¹ Abrams Associates Traffic Engineering, Inc. *Transportation Impact Analysis, San Pedro Avenue Mixed Use Project, City of Pacifica*. April 5, 2017.

Response to Comment 1-5

Comment noted. Please see Response to Comment 1-4.

Letter 2

Murdock, Christian

From: Foster, Patrick@Coastal <Patrick.Foster@coastal.ca.gov>
Sent: Tuesday, May 01, 2018 4:36 PM
To: Murdock, Christian
Cc: Rexing, Stephanie@Coastal
Subject: RE: 505 San Pedro CEQA Document

RECEIVED
MAY 01 2018
City of Murdock

Hi Christian,

2-1

Thank you for forwarding the MND linked below for the proposed project at 505 San Pedro Ave including three new buildings, a skatepark, and parking area. The project site is mostly in the City's CDP jurisdiction, but partly in the Commission's retained jurisdiction which covers about a third of the lot closest to the ocean. It is our impression the City's intent is to process local permits, including a CDP, after which the applicant would seek another CDP from us if the project is approved locally – please let us know if this is inaccurate. Our primary concerns involve biological resources. Specifically, identification of wetlands and required development buffers, as well as the presence of sensitive species on site.

2-2

The MND indicates the potential presence of CRLF, SFGS, Monarch butterfly, and protected raptors/nesting birds. Overall, our biologist concurs with the sensitive species identified as potentially occurring here, though also indicates that CRLF may be using the swale as a corridor and moving across the parcel. As for raptors and other birds, with the open field adjacent to the parcel, the trees and swale vegetation provide good habitat for nesting, so pre-construction surveys are critical. Additionally, it is unclear why no bat species are discussed other than the western red bat, as it is possible hoary bats (*Lasiurus cinereus*) are in the area as well. With regard to sensitive plant species, our biologist cites concern regarding the possible presence of SF spineflower (*Chorizanthe cuspidata* var. *cuspidata*) because it often turns up in disturbed areas. It appears the reconnaissance surveys were completed outside the bloom season for most of the sensitive plants flagged, making it more difficult to detect them.

2-3

As for mitigation, additional measures are requested, including:

- 1) Coastal Commission to receive copies of all surveys.
- 2) Implement IV-1 (p40) limits on work following significant rain events (>0.25 in, with 24h wait period) when CRLF would be more mobile.
- 3) In addition to exclusion fencing, conduct daily checks prior to the start of construction for sensitive wildlife that may have found a way in.
- 4) Cover any open trenches at the end of work each day or fitted with an exit ramp for any wildlife that may fall in.
- 5) Extend IV-3 (p41) raptor surveys to out to 500 ft (300 ft is fine for other birds) and if nesting observed, apply minimum buffer of 500ft (300ft for other birds) until young have fledged.
- 6) Extend IV-4(a) (p41) pre-construction bat emergence surveys to all trees on the parcel and out 500ft since any bats there will also be sensitive receptors to construction noise.
- 7) Apply CDFW-determined buffers to any such sensitive receptors (maternity roosts or hibernacula)
- 8) Removal of invasive non-native species (in addition to omitting them from any planting on the property).

2-4

2-5

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2-8

In terms of wetlands, the MND acknowledges the general buffer rule of 100 feet from the outward edge of riparian vegetation and notes that "an intermittent drainage ditch on the west side of the project area contains some riparian vegetation (e.g., Arroyo Willow)." (p.42) It also notes that this drainage would meet the Coastal Commission's one-parameter wetland definition. However, indirect impacts concerning the swale seem to have been dismissed – while development may not physically disturb the swale on the adjacent parcel, noise and runoff are potentially going to affect any sensitive resources there, and sensitive species likely make use of the area as a wildlife corridor to at least a limited extent as such species will not necessarily be able to use the adjacent upland areas if they are dependent on the cover and moisture the swale provides. These indirect impacts reflect the purpose of establishing development buffers, and protection in this case is warranted. Thus, we request that the applicant complete a full 1-parameter delineation at

**Letter 2
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2-8
Cont'd

2-9

this stage, rather than later on in the permitting process. While the bank/topography may appear to be a distinct boundary for hydro and soil parameters, vegetation may extend towards the parcel of interest, which will be important with respect to setting appropriate buffers. While a typical buffer is 100 ft and may be necessary here as at most locations, we recognize that less may be acceptable depending on the nature of the parcel, its place in the landscape, and the susceptibility of the wetland to various impacts. However, any deviation from typical buffers must be substantiated with clear evidence on these points.

Again, thank you for the chance to comment at this early stage. We look forward to further coordination on this project.

-Patrick

Patrick Foster

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From: murdockc@ci.pacifica.ca.us [mailto:murdockc@ci.pacifica.ca.us]
Sent: Thursday, April 05, 2018 10:24 AM
To: Foster, Patrick@Coastal
Cc: Rexing, Stephanie@Coastal
Subject: 505 San Pedro CEQA Document

Hi Patrick,

We wanted to make you aware that the public comment period on the CEQA document for the 505 San Pedro Avenue (Shawn Rhodes) project started on 4/4/2018. You can access the document at the link below. We invite the Coastal Commission to offer comments on the CEQA document during this period.

http://www.cityofpacifica.org/depts/planning/environmental_documents/default.asp

Best regards,

Christian

Christian Murdock
Senior Planner
Planning Department
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1800 Francisco Blvd.
Pacifica, CA 94044
www.cityofpacifica.org

Email: murdockc@ci.pacifica.ca.us

LETTER 2: PATRICK FOSTER, CALIFORNIA COASTAL COMMISSION, MAY 01, 2018

Response to Comment 2-1

The comment is an introductory statement and does not address the adequacy of the IS/MND.

Response to Comment 2-2

The IS/MND requires preconstruction mitigation for CRLF, SFGS, and Monarch butterfly, and nesting birds (see MMs IV-1 through IV-3).

With respect to hoary bats (*Lasiurus cinereus*), the project biologist determined that the western red bat is the only bat species protected under the Endangered Species Act that may occur on-site based upon presence of suitable habitat. Although hoary bats could possibly roost in the trees along the site, this species is not protected under the Endangered Species Act, nor is it classified by CDFW as a species of special concern. Furthermore, Mitigation Measure IV-4 is intended to prevent take of all roosting bats.

Regarding the possible presence of SF spineflower (*Chorizanthe cuspidata var. cuspidata*) on the site, although surveys did not take place during the blooming period of this species (April-July, sometimes August), this species is unlikely to occur on-site. The site has been highly disturbed from its original condition and consists of a man-made berm. Additionally, the California Natural Diversity Database does not show this species to be within the immediate vicinity of the site. The nearest recorded SF spineflower occurrence is approximately 2.3 miles north of the site and was identified in the early 2000s. Intervening development is located between the project site and the recorded occurrence. Per Live Oak Associates, Inc., given that other SF spineflower occurrences have not been recorded closer to the site and the project site does not support suitable habitat for the species, surveys for the species would not be warranted.

Response to Comment 2-3

In response to the comment, the following revisions are hereby made to Mitigation Measure IV-1 regarding CRLF and SFGS and Mitigation Measures IV-2 and IV-3, regarding Monarch butterfly and nesting birds, respectively. See Response to Comment 2-5 for revisions to the special-status bat mitigation. The commenter's request to require work limits following significant rain events is deemed unnecessary given the limited potential for CRLF to utilize the project site, as discussed in detail on pp. 36-37 of the IS/MND.

Mitigation Measure IV-1 found on page 40 of the IS/MND includes the following to ensure that impacts related to the California Red-legged Frog or San Francisco Garter Snake would be *less than significant*.

IV-1. The following measures shall be implemented prior to and during construction activities:

- *Staging areas and access routes to any work areas shall be*

delineated and inspected by a qualified biologist prior to establishment to avoid unnecessary impacts to California red-legged frog (CRF) and San Francisco Garter Snake (SFGS);

- *Frog- and snake-proof exclusion fencing shall be erected around the project boundary prior to the onset of project activities. Fencing shall be a minimum of three feet in height and buried in the soil to inhibit CRF and SFGS from entering the project area;*
- *Once the exclusion fence is installed, a pre-construction survey shall be conducted to ensure that CRF and/or SFGS individuals are not present within the fenced area. The results of the pre-construction survey shall be submitted to the City of Pacifica Planning Department and California Coastal Commission;*
- *Prior to the initiation of construction activities, worker education and awareness training shall be conducted for all construction crews and contractors that access the site for any period of time. The education training shall be conducted prior to starting work on the project and upon the arrival of any new worker. The training shall include a brief review of the CRF and SFGS life history, field identification, habitat requirements, location of sensitive areas, possible fines for violations, avoidance measures, and correction actions if either species is encountered. The training shall direct workers to conduct daily checks prior to the start of construction for sensitive wildlife that may have found a way in. The program shall cover the mitigation measures, environmental permits, and regulatory compliance requirements as applicable. In addition, a record of all personnel trained during the project shall be maintained for compliance verification by the City of Pacifica Planning Department;*
- *During project activities, all on-site trash that has the potential to attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following completion of construction activities, all trash and construction debris shall be removed from work areas;*
- *Construction personnel shall cover any open trenches at the end of work each day or fitted with an exit ramp for any wildlife that may fall in.*
- *Tightly woven fiber netting or similar material shall be used for erosion control or other purposes at the project to ensure that CRF and/or SFGS are not incidentally trapped. Plastic mono-filament netting (erosion control matting), rolled erosion control products, or similar material, shall not be used at the project site.*

IV-2.

If any eucalyptus trees must be removed during the monarch butterfly winter roosting season, (October through February) a qualified biologist shall survey the project site to ensure that a roosting colony is not present. Because timing of monarch migration on the coast side varies from year to year, the survey shall be conducted at a time to coincide with monarch roosting activity on the coast side for that particular year. Information on monarch roosting activity must be verified with local experts prior to conducting the survey. If a roosting colony is not

detected, tree removal may commence, and further surveys shall not be required. However, if a roosting colony is detected, trees shall not be removed until the winter roosting season has concluded (i.e. monarchs have not been observed in the general area or using the trees). Results of any butterfly surveys shall be submitted to the City of Pacifica Planning Department and California Coastal Commission. If trees have already been removed prior to the onset of the winter roosting season, surveys are not warranted.

- IV-3. *If demolition, renovation, construction, tree removal, and/or tree trimming activities are proposed during the bird nesting season (February 15 through August 31), preconstruction surveys for nesting birds, including raptors, shall be conducted by a qualified biologist within 300 feet of the construction area, prior to, and within one week of initiation of construction activities. If active bird nests are found, and project activities could potentially impact nesting success as determined by a qualified biologist, all necessary permits shall be obtained from the USFWS Migratory Bird Treaty Office and the California Department of Fish and Wildlife (CDFW). Results of the preconstruction surveys shall be submitted to the City of Pacifica Planning Department and California Coastal Commission.*

Response to Comment 2-4

Live Oak Associates has indicated that a 300-foot survey buffer around the site is adequate for nesting raptors. The recommended 500 feet may be excessive, given the vegetative condition of nearby lands and potential visual access issues. Furthermore, the project site is relatively small and narrow in shape and is neighbored by existing development. Thus, a 500-foot buffer would require numerous property owners in the site vicinity to grant access to their sites in order to conduct nesting raptor surveys, potentially impeding implementation of the mitigation measure.

Response to Comment 2-5

The comment is noted; however, legal access to adjacent properties may not be granted, thus making emergence surveys off the existing parcel not possible. Surveys can only be legally conducted on the project site. Notwithstanding this, since release of the IS/MND, the project biologist has recommended the following revisions to the mitigation measures for special-status bats, in order to better specify the survey timing and methods:

Roosting Bats

- IV-4(a). *Prior to removal of any on-site trees, a qualified biologist shall conduct a pre-construction habitat assessment for roosting bats to identify trees with potentially suitable habitat. Once trees with potentially suitable habitat have been identified, those trees would be surveyed for roosting bats prior to construction activities emergence survey. Roosting bat surveys require timing constraints due to the overwintering season. During the overwintering season (approximately October 16 through the month of February), emergence surveys have the potential to result in a false-negative; therefore, emergence surveys will not be conducted in the*

overwintering season. Instead, visual surveys, such as surveys from a man-lift, may be necessary in this season. If active roosts are not found, then further action shall not be warranted. If either a maternity roost or hibernacula (structures used by bats for hibernation) is present, Mitigation Measures IV-4(b) and IV-4(c) shall be implemented. The pre-construction survey shall be submitted to the City of Pacifica Planning Department and the CDFW, and the California Coastal Commission.

- IV-4(b). *If active bat maternity roosts or hibernacula are found in trees which will be removed as part of project construction, the project shall be redesigned to avoid the loss of the tree occupied by the roost to the extent feasible as determined by the CDFW. If an active maternity roost is located and the project cannot be redesigned to avoid removal of the occupied tree, demolition shall commence before maternity colonies form (i.e., prior to ~~April 15~~ ~~March 1~~) or after young are volant (flying) (i.e., usually after ~~August 15~~ ~~July 31~~). Disturbance-free buffer zones, as determined by a qualified biologist and CDFW, shall be observed during the maternity roost season (~~April 15~~ ~~March 1~~ through ~~August 15~~ ~~July 31~~).*
- IV-4(c). *If a non-breeding and non-overwintering roosting bat(s) ~~hibernacula~~ is found in a tree scheduled for removal, the individual(s) shall be safely evicted, under the direction of a qualified biologist (i.e., a biologist holding a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats), by opening the roosting area to allow airflow through the cavity. Demolition shall then follow at least one night after initial disturbance for airflow. This action should allow bats to leave during darkness, thus increasing their chance of finding new roosts with a minimum of potential predation during daylight. Trees with roosts that need to be removed shall first be disturbed at dusk, just prior to removal that same evening, to allow bats to escape during the darker hours.*

Response to Comment 2-6

The comment is noted. Please refer to the language added to Mitigation Measure IV-4(b) above.

Response to Comment 2-7

The applicant and City concur with the commenter's recommendation and removal of on-site invasive plant species will be required as a project condition of approval as part of the site development permit.

Response to Comment 2-8

The IS/MND notes that while the off-site drainage ditch is artificial and created by previous grading, it likely meets the 1-parameter rule employed by the Coastal Commission (p. 42). Notwithstanding this, given that the proposed project has been designed to avoid impacting the ditch, it is not necessary to conduct a full 1-parameter delineation at this time to determine

whether the proposed project would result in a significant adverse CEQA impact, defined in Appendix G of the CEQA Guidelines, as:

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The proposed project does not result in any direct improvements to the ditch. In addition, indirect impacts associated with storm water runoff from the project site would not occur as all stormwater runoff would be collected via on-site bio-retention features and directed to the City's storm drain system.²

With respect to indirect noise impacts, Mitigation Measure IV-3 in the IS/MND would require preconstruction surveys for raptors and nesting birds; such surveys would include the drainage ditch. If raptors, nesting birds, or other special-status species are found within the survey area, construction activities would be delayed. Thus, any special-status wildlife species potentially occurring in the ditch would not be exposed to excessive construction noise.

In summary, while the City respects the Coastal Commission's request to prepare a full 1-parameter delineation for the off-site ditch at this time, it is not necessary to do so in order to determine whether the proposed project could directly or indirectly affect the ditch. Nevertheless, as the IS/MND noted, the applicant will be applying for permits with the Coastal Commission, at which time they would provide any and all requested documentation.

Response to Comment 2-9

What constitutes a suitable buffer is dependent upon the conservation value of the feature for which the buffer is being established, regional context, and the baseline conditions of the project site.

The feature in question was created by previous grading activity; in other words, the feature is a drainage swale dug in dry ground some time ago. It did not replace a blue line stream as noted on the USGS 7.5 Minute Series maps for this area. This ditch also does not meet the definition of a perennial or intermittent creek, as defined in the Local Coastal Land Use Plan (see IS/MND, p. 42). The project site is a narrow rectangle-shaped parcel that abuts an existing shopping mall,

² As noted on p. 61 of the IS/MND, the proposed project would include a series of coordinated Low Impact Development (LID) Site Design Measures to remove pollutants, slow runoff, and release runoff from the site at a level comparable to the pre-development flow volume. The proposed project would include six C.3 areas, or DMAs. The six DMAs would be sized for treatment and flow control of runoff. As discussed previously, all six DMAs would each include a bio-retention basin to treat runoff. Each bio-retention area would be composed of approximately 18 inches of sand underlain with 12 inches of open graded gravel. The basins would each include a plastic liner that would separate the soil and gravel from the surrounding native soils. Runoff from the impervious areas (building roofs, pavement, etc.) would be routed to the basins and would infiltrate through the soil/gravel layers. The soil/gravel layers would act as a filter, removing pollutants and debris from the stormwater throughout the infiltration process. The proposed bio-retention basins would be designed to the standards for bio-retention treatment systems detailed in Section 6.1, Bioretention Areas, of the C.3 Stormwater Technical Guidance.

supports ruderal vegetation and serves as boat and vehicle storage along with some historic illegal dumping. The wildlife species that use this off-site feature are anticipated to consist of relatively common urban species, given that the feature supports little in the way of native vegetation, carries flows only after storm events, and is proximate to a highly degraded project site beyond which is a shopping mall and associated parking lot, thus restricting the use of the project site as a wildlife corridor. Live Oak and Associates has thus concluded that development of this parcel, with the limited setback provided, would not adversely affect any natural stream or creek corridor.