

6 CEQA Required Conclusions

This section presents a summary of the impacts of the Proposed Project in several subject areas specifically required by CEQA, including growth-inducing impacts, cumulative impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant. These findings are based on the analysis provided in Chapter 4: Settings, Impacts, and Mitigation Measures.

6.1 Growth-Inducing Impacts

This Program EIR must examine the potential growth-inducing impacts of the Proposed Project. More specifically, CEQA Guidelines require that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly” (CEQA Guidelines Section 15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

Growth-inducing impacts, such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period, are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events, such as natural disasters and business development cycles. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies related to a single city or development project. Business trends are influenced by economic conditions throughout the state and country, as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private or public sector. These investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. These factors, combined with the regulatory authority of local governments, mediate the growth-inducing potential or pressure created by a proposed plan or policy. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the Proposed Project.

PROJECTED GROWTH

Population

The Planning Area will accommodate a population of approximately 30,500 people at buildout in 2035, an increase of 16 percent over the 2013 population of 26,400. This represents an average annual growth rate of 0.66 percent. As explained in Section 3.4 of this EIR, in the BVSP Area specifically, the population is expected to grow from 670 people in 2013 to 1,780 people in 2035, an increase of 166 percent, or an average annual growth rate of 4.5 percent.

Growth Management

The Proposed Project allows for increased housing development and resulting population growth. This growth is necessary in order to meet Belmont's Regional Housing Need Allocation (RHNA), as well as in accordance with the regional policies of Plan Bay Area 2040 to "prioritize more compact, mixed-use development that combines both residential and commercial uses and is located close to public transit, jobs, schools, shopping, parks, recreation and other amenities." Rather than inducing growth, the Proposed Project accommodates projected demand for development in target areas of the city that can absorb the city's fair share of future housing, which supports the Bay Area as a whole.

The Planning Area is fully urbanized and lacks opportunities for greenfield development, as the only open, undeveloped areas are designated for open space. Given the constraints of its natural geography as well the presence of neighboring communities, the Proposed Project cannot induce outward growth.

All growth within the Planning Area under the Proposed Project will allow for greater transportation choices beyond single occupancy trips, because permitted future growth will concentrate development in patterns that make transit, walking, and biking more desirable options. Proposed Project policies promote preservation both of open spaces and Belmont's wooded residential areas, which limits growth outside of the target areas that are recommended by Plan Bay Area. Furthermore, the Proposed Project does not include any large-scale infrastructure improvements such as road widening, and any utility improvements will take place along existing utility lines and in already impacted areas. Any City sewer system infrastructure that will result from the Proposed Project will be sized to meet the capacity required by the permitted amount of development.

Public Facilities

The Planning Area is mostly urbanized and is served by existing streets, utility infrastructure, and service systems. Water supply to the Planning Area is provided by the Mid-Peninsula Water District (MPWD), which covers the City of Belmont, small portions of the City of San Carlos, and parts of unincorporated San Mateo County, including the Harbor Industrial Area (HIA). Currently, MPWD purchases all of its water from the San Francisco Public Utilities Commission (SFPUC). Most of the Planning Area's water is drawn from the Sierra Nevada mountains through the Hetch Hetchy Regional System, and the rest is produced by the SFPUC from its local watersheds and facilities in Alameda and San Mateo counties.

The City of Belmont provides sewer collection and storm drainage services within the city. Most of the wastewater generated in the city is conveyed to the Silicon Valley Clean Water (SVCW) treatment plant, which discharges the effluent to the San Francisco Bay. In the HIA, San Mateo County provides sewer collection and storm drainage services through the Harbor Industrial Sewer Maintenance District and the Harbor Industrial Drainage Maintenance District, respectively.

Solid waste generated by the future residents and businesses in the Planning Area is disposed of through franchise agreements that the City of Belmont as well as the County of San Mateo have signed with Recology of San Mateo, which has capacity for the increased population's solid waste. Residential and commercial solid waste collected by Recology, including recyclable and organic materials, is sent to Shoreway Environmental Center for processing and shipment.

Future development under the Proposed Project could generate additional demand for water and wastewater, storm water, and solid waste services; however, compliance with federal, State, and local regulations, as well as policies in the Proposed Project would reduce the impacts of the Proposed Project to less than significant levels. The water, wastewater, and stormwater service providers within the city have prepared urban water management plans, sewer master plans, and storm drain master plans to assess the current and future demands of their service area. Compliance with federal, State, and local water and wastewater regulations and the Proposed Project policies would reduce potential impacts to water and wastewater service needs and infrastructure needs to less than significant levels. Compliance with the city's current grading, drainage, and storm water regulations would ensure that the capacity of the storm water drainage systems would not be exceeded, and impacts would be less than significant. Potential impacts to solid waste would be reduced through compliance with SB X7-7, which has been set by CalRecycle to provide 75 percent recycling, composting, or source reduction of solid waste by 2020. Implementation of the Proposed Project policies would assist the city in complying with this new waste reduction goal.

The Belmont Fire Protection District (BFPD) provides fire protection services for the city and the HIA, while the City's Police Department provides police services within the city only. Police and fire stations would be constructed as needed to maintain service levels in proportion to population growth.

If the City's parkland standard remains the same, as proposed in the Proposed Project's General Plan (5.0 acres per 1,000 residents), the City would need to add about 40.3 acres of parks and recreational facilities by 2035 to address its existing deficiency as well as to serve new population growth. Within the BVSP Area, an additional 5.6 acres of public parkland are needed to meet the parks and recreation needs of the new population. The Planning Area contains sufficient undeveloped land to accommodate the need for new parks and recreation facilities in conjunction with future growth. In addition to creating new public parks and open spaces, the BVSP seeks to supplement with privately owned public open spaces and common open spaces. The BVSP includes standards for public and private open spaces in new development, based on land use designation.

Belmont-Redwood Shores School District (BRSSD) provides public education from kindergarten through eighth grade to residents in Belmont and the neighboring community of Redwood Shores (part of Redwood City). Sequoia Union High School District (SUHSD) provides public education from ninth to twelfth grades to residents in southern San Mateo County; SUHSD's Carlmont High

School is located in Belmont and serves Belmont residents as well as residents from other neighboring cities.

Both BRSSD and Carlmont High School are anticipated to experience significant growth during the planning period, and their existing facilities are not adequate for their projected student enrollments at buildout of the Proposed Project. BRSSD has taken several initiatives to ensure quality facilities and to increase enrollment capacity, including the creation of a Facility Master Plan in 2011. SUHSD plans to complete construction of a 10-classroom building at Carlmont High School in July 2017, which will exceed the projected 2020 enrollment, along with the additional enrollment through 2035 as a result of implementation of the Proposed Project.

Increase in Regional Housing Demand

Belmont contained 10,900 housing units in 2013. The Proposed Project's General Plan estimates future buildout in 2035 to be 12,400 housing units. In the BVSP Area, the 2013 total of 340 housing units is projected to grow to 890 units in 2035. As the employment base in Belmont continues to increase, more people may be drawn to live in the city. As a result, housing demand may increase in Belmont and other adjacent areas.

The Association of Bay Area Governments (ABAG) projects that Belmont will have 11,580 housing units by 2035, based on land use designations in the current General Plan. While the Planning Area contains the HIA in addition to the City of Belmont, the HIA currently has less than 100 housing units and is not projected to add housing by 2035 under the current General Plan. Therefore, the total housing capacity provided by the proposed General Plan should be sufficient to meet the city's long-term needs, as it exceeds the number of housing units projected by ABAG. The Proposed Project focuses new housing growth in target areas, including the BVSP Area, to accommodate its Regional Housing Needs Allocation. The proposed General Plan does not modify the existing Housing Element, though subsequent revisions to the existing Housing Element will extend, modify, or add to programs as needed to continue to respond to the city's "fair share" of regional housing needs, as required by law.

Jobs/Employment Balance

A city's jobs/employment ratio (jobs to employed residents) would be 1:1 if the number of jobs in the city equaled the number of employed residents. In theory, such a balance would eliminate the need for commuting to other cities. More realistically, a balance means that in-commuting and out-commuting are matched, leading to efficient use of the transportation system, particularly during peak hours. The jobs/employment ratio in Belmont was 0.75 in 2013, which means there are fewer working adults who travel into the city to work than there are working adults who live in the city. Based on development projected under the Proposed Project, this ratio is expected to increase to 0.92 in 2035 through the addition of jobs at a slightly faster rate than new residents, thereby bringing the city closer to a balance.

Indirect growth-inducing impacts such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period are difficult to assess with precision, since future economic trends may be influenced by unforeseeable events, such as natural disasters and business and development cycles. Moreover, long-term changes in economic

and population growth are often regional in scope; they are not influenced solely by changes or policies in Belmont. However, it must be noted that the San Francisco Peninsula is in the midst of a pronounced housing shortage, due to rising demand as well as local pressures that restrict the production of new housing supply. The Proposed Project seeks to create a balanced community, with retail uses, parks, and other features to accommodate population growth, though since the jobs/employment ratio is still projected to be weighted towards jobs, any increase in jobs in the Planning Area has the potential to induce growth, lead to growth pressure, or lead to pressure on services in surrounding communities.

6.2 Cumulative Impacts

CEQA requires that an EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence” (CEQA Guidelines Section 15130(b)).

The cumulative analysis examines impacts of a project taken together with past, present, and probable future projects producing related impacts. The analysis in this section includes:

- a determination of whether the long-term impacts of all related past, present, and future plans and projects would cause a cumulatively significant impact; and
- a determination as to whether implementation of the Proposed Project would have a “cumulatively considerable” contribution to any significant cumulative impact.

The term “Cumulative Context” is used to describe related past, present, and future plans and projects. The Cumulative Context in this analysis varies depending on the issue area. For example, the Cumulative Context for impacts related to aesthetics is the viewshed of all areas within the Planning Area, as well as all locations that have an unobstructed view of the Planning Area. For many impacts, the Cumulative Context was defined as the Planning Area and the surrounding jurisdictions, and the San Carlos General Plan EIR¹, San Mateo General Plan EIR², and Redwood City General Plan EIR³ were often used to inform the analysis.

The Proposed Project includes the comprehensive propose General Plan, Belmont Village Specific Plan (BVSP), Climate Action Plan (CAP), and related zoning regulations. All major development projects foreseeable by the City within the Planning Area have been accounted for in the proposed General Plan, and thus inherently are included in the analysis of the Proposed Project.

¹ San Carlos 2030 General Plan Draft EIR
<http://cityofsancarlos.org/generalplanupdate/whats_new_/san_carlos_2030_general_plan_eir.asp>

² San Mateo General Plan EIR, 2009 <<http://www.cityofsanmateo.org/index.aspx?NID=1813>>

³ Redwood City General Plan EIR, 2010 <<http://www.redwoodcity.org/home/showdocument?id=5045>>

This analysis evaluates whether the impacts of development under the Proposed Project, together with the impacts within the Cumulative Context, would result in a cumulatively significant impact. It then considers whether the incremental contribution of the Proposed Project to this cumulative impact would be considerable. Both conditions must apply in order for the Proposed Project's cumulative effects to rise to the level of significance. In many instances, the analysis provided in Chapter 4 represents a cumulative analysis because it combines the anticipated effects of the Proposed Project with anticipated effects of regional growth and development (e.g. transportation, air quality, energy and greenhouse gases, and noise).

Aesthetics

Growth in the San Mateo County region, including the City of Belmont, will result in substantial changes to the visual character of the region. ABAG projects that between 2015 and 2035, the population of San Mateo County will grow by 17 percent, and the number of jobs will increase by 15%.⁴ Development to accommodate new residents and jobs may impact visual resources. The views from scenic vistas may include new development, visual character of existing urban areas may change with new infill and development of greater density, and growth will likely create new sources of light and glare. However, most development in the region will occur in infill areas that have already been developed, and large areas of San Mateo County are protected in open space preserves. Assessment of visual quality of any new infill development is a subjective matter, and reasonable people may differ as to whether development of urban uses would constitute a substantial degradation of the existing visual character or quality of the region.

However, as urban development occurs in nearby cities, nighttime light will obscure views of the night sky. Future development to accommodate projected growth would lead to a more intense nighttime glow, which would be perceptible throughout the area. Due to new sources of substantial light or glare in the area from surrounding sources, there is a **significant cumulative impact** related to visual resources.

The Planning Area is characterized by scenic vistas of wooded hills, the San Francisco Bay, and stretches of open space. Changes to the land use designations and development standards in the Proposed Project could result in higher density or intensity development in some areas that could partially obstruct views currently available to the public as well as degrade visual quality. However, the Proposed Project directs development into target areas and protects existing green space and wooded areas. In addition, a number of the Proposed Project's policies provide long-term protections for scenic vistas in Belmont; these policies include the continuation of the Hillside Preservation District program and Design Guidelines and Review for development projects. Therefore, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to scenic vistas.

The portion of Highway 280 west of the Planning Area is classified as a State Scenic Highway. The wooded hills between Highway 280 and the Planning Area comprise the scenic resources visible from the portion of Highway 280 west of the Planning Area. These scenic hills are not included in the Planning Area and as such will not be impacted by the Proposed Project. Therefore, the

⁴ 2013 ABAG Projections.

Proposed Project makes **no cumulatively considerable** contribution to impacts related to scenic highways.

Although, the Proposed Project anticipates more housing units and non-residential development than the existing conditions, most future development anticipated in the Proposed Project is infill development—development on vacant or underutilized sites in existing neighborhoods. In the Harbor Industrial Area land use designation in the General Plan, new development may result in some buildings that are taller or of a greater scale than the current development in the local neighborhood. Taller or larger buildings do not necessarily constitute a visual impact, and policies and regulations in the Proposed Project reduce the potential impact of new development that is inconsistent with established neighborhoods. As a result of the policies of the Proposed Project that ensure compatible development and high-quality design, the Proposed Project makes a **less than cumulatively considerable** contribution to impacts related to the visual character of the area.

Implementation of the Proposed Project may result in the construction of new buildings that would contribute to nighttime light or daytime glare. However, General Plan policies minimize new light pollution and glare. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to the light and glare.

Air Quality

The Cumulative Context for cumulative impacts related to air quality is the Planning Area and the entire San Francisco Bay Area Air Basin (SFBAAB). Sources of toxic air contaminants from past, present, and future projects may result in localized health impacts on sensitive land uses. As shown in Table 4.2-14, existing cancer risks from several roadway and other sources are already greater than the threshold established by the BAAQMD. Additionally, cumulative development in the Planning Area and entire SFBAAB would result in emissions of criteria pollutants for which the Bay Area Air Quality Management District (BAAQMD) has established thresholds of significance. It is likely that some projects would result in long-term emissions of criteria pollutants that would exceed the BAAQMD thresholds and would worsen regional air quality. Consequently, the cumulative development of past, present, and future projects would have a **cumulatively significant** impact with respect to air quality.

As discussed in Impact 4.2-1 in Chapter 4.2, “Air Quality,” both the proposed General Plan and BVSP would support the goals of BAAQMD’s *2010 Clean Air Plan*, including all applicable control measures, and would not conflict with its implementation. The comprehensive suite of General Plan and BVSP policies would ultimately reduce the severity of growth-oriented criteria pollutants, relative to conditions without the plans. Therefore, the Proposed Project would have a **less than cumulatively considerable** contribution to impacts related to consistency with the *2010 Clean Air Plan*.

Notwithstanding the Proposed Project’s consistency with the *2010 Clean Air Plan*, individual projects may still generate construction and operational emissions in excess of BAAQMD’s project-level thresholds, even with implementation of Mitigation Measures AQ-1 through AQ-5. Accordingly, criteria pollutant emissions associated with development under the General Plan and BVSP are conservatively identified to have a **cumulatively considerable** contribution to impacts related to regional air emissions.

Development under the General Plan and BVSP would generate diesel particulate matter (DPM) emissions during construction and operation. When combined with ambient concentrations from existing sources, existing and future receptors in the Planning Area may be exposed health risks in excess of BAAQMD's cumulative thresholds. Policies from the General Plan and BVSP, as well as Mitigation Measure AQ-6 would reduce health risks to receptors, but there may be instances where project-specific conditions preclude the reduction of health risks below cumulative thresholds. Therefore, the Proposed Project is conservatively identified as having a **cumulatively considerable** contribution to health impacts from toxic air contaminant exposure.

With respect to health risks from locally concentrated carbon monoxide (CO), existing and new receptors may be exposed to cumulative CO concentrations generated by the Proposed Project and surrounding land uses. The traffic data included increased trips associated with the Proposed Project and background traffic levels (i.e., cumulative). As discussed in Impact 4.2-5 in Chapter 4.2, "Air Quality," modeled CO concentrations at study area intersections are not expected to contribute to any new localized violations of the 1-hour or 8-hour ambient air quality standards. Accordingly, the Proposed Project would have a **less than cumulatively considerable** contribution with regard to receptor exposure health risks from locally concentrated CO emissions generated by cumulative traffic volumes.

The Proposed Project's contribution to cumulative impacts from asbestos and odors would likewise be **less than cumulatively considerable**. All projects requiring demolition would be required to comply with BAAQMD Regulation XI, Rule 11-2. Odor emissions would not result in nuisance violations and would be consistent with surrounding land uses and ambient odors in the existing environment.

Biological Resources

The Cumulative Context for biological resources includes the Planning Area and immediately surrounding lands and waterways. Belmont's extensive open spaces are part of the regional open space network on the San Francisco Peninsula. These connected open spaces provide valuable travel corridors for wildlife and habitats. As shown in Chapter 4.3 in Figure 4.3-4, the area also includes numerous special status species that could be impacted by new development.

Environmental laws and regulations have been applied with increasing rigor since the early 1970s and include the California Endangered Species Act, Federal Endangered Species Act, and the Clean Water Act, as described in the Regulatory Setting of Chapter 4.3, "Biological Resources." Actions resulting from implementation of the Proposed Project, and other future projects within the cumulative geographic context, would be required to comply with local, State, and federal laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources, including wetlands, other waters of the U.S., and special-status species.

While the majority of the Planning Area is urbanized and thus has low habitat value for wildlife, areas of the hillsides and along the creek corridors have been identified as providing important habitat for sensitive plants and animals. The Planning Area is bordered by Redwood City to the east, San Carlos to the south, San Mateo to the north, and Crystal Springs watershed lands for the San Francisco Public Utilities District to the west. San Mateo County's population is expected to

increase in coming years, which, depending on the development pattern that emerges to accommodate such growth, could result in a decrease in habitat for native flora and fauna, increased indirect effects such as noise disturbance, increased night lighting, harassment from pets, increased mortality from automobiles, and increased fragmentation of habitat.

Development in San Carlos⁵ and Redwood City⁶ is primarily restricted to already urbanized areas, and existing measures in the Redwood City EIR mitigate any potential impacts from development that is expected to locate in areas with sensitive biological resources such as the Saltworks Development Proposal in Redwood City. San Mateo's⁷ General Plan EIR includes mitigation measures to reduce any potential impacts. The open space to the west of Belmont is protected and will not experience development. There is a **less than significant cumulative impact** to biological resources.

Development under the Proposed Project would introduce new uses in or adjacent to habitats that support special-status species, riparian habitats, and wildlife corridors. However, the Proposed Project does not propose new urban land use designations for land that is not already designated for urban uses. In addition, implementation of policies and regulations in the Proposed Project would minimize or avoid impacts to sensitive species, habitats that support special-status species, riparian habitats, and wildlife corridors. The Proposed Project makes a **less than cumulatively considerable** contribution to impacts related to special species, riparian habitats, and wildlife corridors.

Development resulting from implementation of the Proposed Project along wetlands or waters, such as in the vicinity of the O'Neill and Belmont Sloughs, could potentially affect these resources either directly through fill or indirectly through the alteration of the hydrologic regime. However, policies in the proposed General Plan minimize or avoid impacts to these resources by requiring the protection and preservation of such resources. In addition, if jurisdictional resources are determined to be potentially impacted by a project, all such future development projects would require Clean Water Act Section 404/401 Permits from the U.S. Army Corps of Engineers (USACE) and RWQCB, respectively, and a 1600-Series Streambed Alteration Agreement with the CDFW. Compliance with federal standards would ensure that the Proposed Project, and any subsequent development, would not result in a significant impact to federally protected wetlands. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to federally protected wetlands.

The City of Belmont has a Tree Ordinance to promote the healthy growth of trees, control the removal of trees, and encourage the replacement of trees within the City. Policy 2.4-2 in the proposed General Plan requires the City to maintain tree protection and removal standards implemented by the Tree Ordinance, thus the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to conflicting with local policies.

⁵ San Carlos 2030 General Plan Draft EIR
<http://cityofsancarlos.org/generalplanupdate/whats_new_/san_carlos_2030_general_plan_eir.asp>

⁶ Redwood City General Plan EIR, 2010 <<http://www.redwoodcity.org/home/showdocument?id=5045>>

⁷ San Mateo General Plan EIR, 2009 <<http://www.cityofsanmateo.org/index.aspx?NID=1813>>

There are no adopted Habitat Conservation Plans that include land within the Planning Area. Moreover, there are no Natural Community Conservation Plans at the county level that include land within the Planning Area. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to conservation plans.

Increased noise, light, and habitat disturbance resulting from urban development both within the Planning Area as well as in adjacent cities and unincorporated areas could adversely affect biological resources such as migratory birds and other wildlife species. However, with applicable policies in place as described in the direct impact analysis in Chapter 4, the Proposed Project's contribution to this potentially significant cumulative impact is **not cumulatively considerable**.

Cultural Resources

The Cumulative Context for cumulative impacts related to cultural resources is the Planning Area and surrounding jurisdictions. Although impacts to cultural resources are typically highly localized, several impacts in a given area that are less than significant can contribute to a cumulative impact in loss or harm to cultural resources. For example, while the loss of one particular site may not be significant, the loss of one site in each jurisdiction in an area may constitute a significant cumulative impact.

There are cultural resources in the Cumulative Context that could be affected by new development. However, according to the EIRs of the San Carlos General Plan, the Redwood City General Plan, and the San Mateo General Plan, implementation of each jurisdiction's General Plan would have less than significant impacts on cultural resources. Adherence to local goals, policies, and mitigation measures, as well as to federal and State laws, would protect historic architectural resources, archaeological and paleontological resources, human remains, and historic architectural resources. Impacts on cultural resources in the preserved space around the Crystal Springs Reservoir would be limited, as development is prohibited in this area. Within the BVSP Area, however, the historic resource of Firehouse Square is anticipated to redevelop under the BVSP. Therefore, there is potential for a historic resource's significance to be impaired, resulting in a **significant cumulative impact**.

Belmont has several sites identified on the National Register of Historic Resources, on the California Office of Historic Properties Directory, or as local historical landmarks. Each of these sites are located on parcels with an urban land use designation in the Proposed Project. Implementation of the Proposed Project may result in actions that could adversely affect historic resources. Historic resources in the city are subject to the Structures of Historic or Aesthetic Value Article within Belmont's Buildings Ordinance (Municipal Code Chapter 7, Article VII), which includes criteria for including resources in the city's historic resources inventory and procedures for designating those resources as historical. The Buildings Ordinance also requires permits to work on a historic resource. Although the General Plan and the BVSP include policies that would minimize or avoid impacts to historical resources by requiring the protection and preservation of such resources, the anticipated redevelopment of Firehouse Square in the BVSP Area has the potential to impact the significance of a historic resource, as reuse of the existing building is not required. Mitigation Measure CULT-1 requires any project applicant impacting the Firehouse Building to maintain the existing structure's Spanish façade, while Mitigation Measure CULT-2 requires the project to include detailed signage with historical information about the site, consistent

with the recommendations of the historical evaluation prepared for the resource. With mitigation, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to historical resources.

Three prehistoric sites have been recorded in Belmont, and additional unrecorded archaeological resources may exist in the City. Future development projects allowed under the Proposed Project may involve grading, excavation, or other ground-disturbing activities, which could disturb or damage unknown archaeological resources. The General Plan and BVSP include policies and regulations that would minimize or avoid impacts by requiring the protection and preservation of such resources. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to archaeological resources.

Although no paleontological resources in the Planning Area have been identified for protection, construction activities such as grading, excavation, and ground-disturbing activities may result in the accidental destruction or disturbance of paleontological sites. However, the majority of development anticipated under the Proposed Project will involve redevelopment of, or new development within, existing developed areas. In addition, policies in the General Plan and BVSP require an evaluation if paleontological resources are discovered during construction. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to paleontological resources.

All future development in the Planning Area will be in accordance with state laws pertaining to the discovery of human remains. Accordingly, if human remains of Native American origin are discovered during project construction, the developer and/or the Planning Department would be required to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (Pub. Res. Code Sec. 5097). The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to human remains.

Energy, Greenhouse Gases, and Climate Change

The analysis of GHG impacts presented in Section 3.6, “Greenhouse Gas Emissions,” is inherently cumulative. Climate change is a global problem, and greenhouse gases (GHGs) are global pollutants, unlike criteria air pollutants (such as ozone precursors, which are primarily pollutants of regional and local concern). Given their long atmospheric lifetimes (see Table 4.6-2 in Chapter 4.6, “Energy, Greenhouse Gases, and Climate Change”), GHGs emitted by numerous sources worldwide accumulate in the atmosphere. Therefore, the Cumulative Context for GHG impacts is the entire planet. Because climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, global climate change would have a **significant cumulative impact** on the natural environment as well as on human development and activity.

However, no single emitter of GHGs is large enough to trigger global climate change on its own. Rather, climate change is the result of the cumulative effect of individual contributions of past, present, and future sources. Even the contributions of past, present and future projects in a single geography (e.g., the Planning Area) cannot trigger global climate change alone. As discussed in Chapter 4.6, “Energy, Greenhouse Gases, and Climate Change,” operation of future development in the Planning Area would be subject to the City’s CAP, which is part of the Proposed Project. The

measures proposed under the CAP would enable the City to reduce its community GHG emissions to meet the reduction targets of 15 percent below 2005 levels by 2020 and 50 percent below 2005 levels by 2035, which are consistent with Assembly Bill (AB) 32, Senate Bill (SB) 32, and Executive Order (EO) S-3-05. The BVSP is consistent with all CAP measures, and as such, operational emissions supported by the BVSP are not expected to conflict with the City's ability to implement the GHG emissions reduction outlined in the CAP. Since the CAP is consistent with AB 32, SB 32, and EO S-3-05, the proposed General Plan and BVSP would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Accordingly, the Proposed Project's incremental contribution to cumulative GHG impacts is **less than cumulatively considerable**.

Since energy legislation adopted by California and local governments is intended to conserve statewide and regional energy consumption, projects that conflict with applicable plans and policies would contribute to a cumulative energy impact. Past, present and future projects in the Planning Area are all energy consumers, and could result in significant consumption of energy. However, as new efficiency technologies and renewable energy become more prevalent, the cumulative consumption of energy in the Planning Area will be of a lower intensity. Consequently, there would be a **less than significant cumulative impact** related to energy consumption.

As discussed in Chapter 4.6, "Energy, Greenhouse Gases, and Climate Change," the Proposed Project would incorporate energy-saving measures required by State and local energy policies, including CalGreen and Title 24, enacted since the 1970s to improve energy efficiency and reduce waste. Additional policies outlined in the General Plan, BVSP, and CAP would further reduce energy consumption beyond state recommendations. Therefore, the Proposed Project would assist the region in meeting energy reduction targets established in statewide legislation. Because the Proposed Project would not conflict with applicable state or local energy standards, it would result in a **less than cumulatively considerable** contribution to energy impacts.

Geology, Soils, and Seismicity

The geographic area considered for the Cumulative Context for geology, soils, and seismic hazards is the entire San Francisco Bay Area region. This region is considered seismically active, and future development may bring additional people and structures to the area; however, attracting people to the seismically active area does not constitute a significant effect of the Proposed Project on the environment.⁸ In addition, impacts for these topics are site-specific and there is no additional cumulative impact that results from the combined geologic, soils, or mineral resources of past, present, and future projects. There is a **less than significant cumulative impact** related to geology, soils, and seismicity.

According to the California Geological Survey, Belmont is not listed as being affected by an Alquist-Priolo Earthquake Fault Zone. In terms of groundshaking, development associated with the Proposed Project would be required to conform to the current seismic design provisions of the most current version of the California Building Code (CBC), which contains the latest seismic safety requirements to resist ground shaking through modern construction techniques. There are locations within the Planning Area considered prone to liquefaction and landslide hazards. The

⁸ See *CBIA v. BAAQMD* (2015) 62 Cal. 4th at 390.

impacts from ground failure, including liquefaction and landslides, from development of land uses associated with the Proposed Project would be addressed through site-specific geotechnical studies prepared in accordance with CBC requirements and standard industry practices. In addition, policies in the General Plan and BVSP limit threats to development from seismic hazards. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to seismic hazards.

Development associated with the Proposed Project would likely include earthwork activities that could expose soils to the effects of erosion or loss of topsoil. As required by Chapter 9 of the Belmont Municipal Code, earthwork and ground-disturbing activities, unless below minimum requirements, require a grading permit to minimize erosion, and the City's grading permit requirements ensure that construction practices include measures to protect exposed soils. In addition, development that disturbs more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit, including the implementation of best management practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil, and the implementation of a storm water pollution prevention plan (SWPPP) through the local jurisdiction. General Plan and BVSP policies would further reduce potential impacts of erosion. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to erosion.

Some improvements associated with implementation of the Proposed Project could be located on geologic units or soils that are unstable, or that could become unstable and result in geologic hazards if not addressed appropriately. The potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical information in the planning and design process for individual projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to unstable soils.

Future development that may result from implementation of the Proposed Project would not require septic systems or other alternative waste water disposal systems. Therefore, the Proposed Project's contribution is **not cumulatively considerable**.

Hazards and Hazardous Materials

The Cumulative Context for cumulative impacts related to hazards and hazardous materials is the Planning Area and adjacent jurisdictions. The Proposed Project in conjunction with growth planned in surrounding jurisdictions is not anticipated to present a public health hazard to residents. New development in the region may result in an increase in routine use, transportation, and disposal of hazardous materials, as well as handling of hazardous materials near existing and proposed schools. However, existing federal, State, and local regulations create and enforce standards for these activities. Upset or accident conditions, emissions of hazardous materials, and development on a site listed as containing hazardous materials usually occur on a project-by-project basis, rather than in a cumulative manner. Individual projects in San Mateo County and nearby cities would be required to comply with federal, State, and local regulations.

There are three public airports in San Mateo County—San Francisco International Airport, Half Moon Bay Airport, and the San Carlos Airport. SACOG serves as the Airport Land Use

Commission (ALUC) and has developed Airport Land Use Compatibility Plans (ALUCP) for almost all of the airports. Compliance with the ALUCPs and existing federal, State, and local laws protect the safety of people near airports and private airstrips.

There are wildfire hazards in the Planning Area and surrounding jurisdictions, including areas identified an extreme threat to development along Pulgas Ridge in San Carlos. Wildfire prevention is a shared responsibility between federal, State, and local agencies. Threats of wildfires on non-federal lands in unincorporated areas are the responsibility of CAL FIRE and addressed through compliance with Title 14 of the California Code of Regulations, Division 1.5. There is a **less than significant cumulative** impact related to hazardous materials, airport hazards, and wildfire hazards.

Development under the proposed General Plan and Phase I Zoning would result in new dwelling units, mixed-use facilities, industrial facilities, and commercial space. Measures EC3 and EM4 in the CAP encourage the installation of solar and other renewable energy projects, which may result in the distribution of potentially hazardous materials in the Planning Area. Thus, implementation of the Proposed Project would include land uses and renewable energy systems that could increase exposure to risk of hazards, accident conditions, hazardous materials near schools, or development in locations that have been identified as hazardous sites. However, existing federal, State, and local regulations create and enforce standards for these activities. The County of San Mateo Division of Environmental Health Services is responsible for implementing hazardous waste and materials State standards in the Planning Area and surrounding area. These standards apply no matter the scale of the use, transportation, or disposal of hazardous materials. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to hazardous materials.

The San Carlos Airport is located approximately two miles southeast of the Planning Area in the city of San Carlos. The Airport adopted an ALUCP per California law to ensure compatibility between the airport and nearby land uses. State law requires that the airport land use commission review the General Plan for consistency between the ALUCP and the proposed land uses in Area B as shown in Figure 4.7-4. In addition, policies in the General Plan and BVSP further reduce the potential impact by requiring compliance with the land use compatibility provisions of the ALUCP. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to airport hazards.

There are no private airstrips within the Planning Area. Therefore, the Proposed Project has **no cumulatively considerable** contribution to impacts related to private airstrips.

Implementation of the Proposed Project would result in new development and population growth, resulting in an increase in demand for emergency services, which could affect implementation of the City of Belmont's Emergency Response Plan. However, the General Plan includes policies that require the City to keep the City's Emergency Response Plan and city ordinances updated and consistent with the most recent State laws and information; to adopt and maintain an LHMP; and to adopt emergency service standards. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to emergency response.

Approximately half of the Planning Area is at risk for wildland fires. Development in these areas would be consistent with Belmont's Fire Code. These requirements reduce the threat to developed

areas. In addition, the proposed General Plan includes policies that address the Urban/Wildland Interface Zone, wildland fire risk, and fire-fighting facilities and services. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to wildland fires.

Hydrology and Water Quality

The Cumulative Context of potential hydrological impacts includes the Planning Area and the watersheds potentially impacted by development in the Planning Area—the Laurel Creek watershed and the Belmont Creek watershed. New development is expected in the Cumulative Context, which has the potential to generate impacts related to violation of water quality standards, erosion and sedimentation, construction-related water quality impacts, interference with groundwater recharge, flood hazards, and dam failure. State and regional regulations described in Chapter 4.8 of this EIR, “Hydrology, Flooding, and Water Quality,” will reduce the rate of runoff, filter out pollutants, and/or facilitate groundwater infiltration to meet requirements of Title 22, California Toxics Rule (CTR), Basin Plan water quality objectives, and other program objectives. Construction activities are required in order to comply with the State Water Resources Control Board statewide NPDES stormwater permit for general construction activity, and any other necessary site-specific waste discharge requirements (WDRs) or waivers under the Porter-Cologne Act, as well as local agency public works construction standards and applicable ordinances that regulate construction discharges. Impacts related to runoff, water quality violations, and discharge standards are localized and addressed by existing regulations. There is a **less than significant cumulative impact** related to hydrology and water quality.

The Proposed Project would allow for additional development within the city that would increase the amount of impervious surfaces and could therefore increase the amount of runoff and associated pollutants during both construction and operation. However, the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) requires every construction activity within Belmont that has the potential to negatively affect water quality to comply with the NPDES Stormwater Discharge Permit. Furthermore, General Plan policies in the Proposed Project require the City to comply with the Municipal Regional Stormwater Permit requirements and with the federal Clean Water Act and require development projects to incorporate BMPs consistent with the NPDES permit guidelines. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to water quality or discharge standards.

The Proposed Project would allow for additional development within the Planning Area that could increase demands for water. However, this increase in water demand would not impact local groundwater supplies as the primary purveyor of water for the city, the Mid-Peninsula Water District (MPWD), currently does not utilize any local groundwater or surface water supplies to serve the city. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to groundwater supply.

The majority of development that may occur as a result of the Proposed Project is redevelopment of areas with existing impervious surfaces; however, future development/redevelopment allowed under the Proposed Project could impact the existing drainage system. Any development that would occur under the Proposed Project would be subject to the erosion and runoff control provisions contained in the SMCWPPP, as well as the NPDES Stormwater Discharge Permit process. In addition, development occurring during buildout of the Proposed Project in special

flood hazard areas would also comply with flood damage prevention measures contained in Chapter 7, Article IX of Belmont's Municipal Code, which would prevent development under the Proposed Project from altering the special flood hazard areas in a manner that may cause on- or off-site flooding. In addition, policies in the proposed General Plan are intended to preserve natural watercourses or naturalized drainage channels, and to ensure future development incorporates BMPs to reduce runoff from a site. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to drainage patterns and stormwater drainage capacity.

The Proposed Project would allow for new development that could potentially degrade water quality; however, development would be subject to the SMCWPPP, as described above. Furthermore, the General Plan contains goals and policies pertaining to water quality, including continuing to participate in a local water pollution prevention program ensuring that new infrastructure design and construction incorporates BMPs. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to water quality.

The Proposed Project would allow for additional residential development within the Planning Area, including on vacant sites south of Ralston Avenue between Alameda de las Pulgas and Chula Vista Drive. However, Belmont requires a special use permit for any development proposed in areas of special flood hazards, as defined as the 100-year flood hazard area (Municipal Code Chapter 7, Article IX). The ordinance also restricts or prohibits land uses considered unsafe in a floodplain and establishes the required elevation of the lowest floor of residential uses relative to the base flood elevation for each type of flood zone. Moreover, developing in flood hazard areas is not an environmental impact for CEQA purposes in and of itself; the Proposed Project's impact would only be significant if the Proposed Project exacerbates existing environmental hazards or conditions that already exist. Policies in the proposed General Plan would impose limitations on future development to ensure that the Proposed Project does not exacerbate any of the existing 100-year flood hazard areas. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to housing and structures in the 100-year flood hazard area.

There are two dams located within or adjacent to the Planning Area: the Crystal Springs Dam and the Notre Dame Dam. Both dams have been assigned high hazard ratings and have emergency action plans in place. These dams are periodically inspected by the State of California Division of Dam Safety. Dam failure is considered a low-probability event, caused most often by age, poor design, or structural damage resulting from earthquake or flood. With continued evaluation of dam stability and continued compliance with state regulations, impacts associated with flooding due to dam failure are not anticipated. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to dam failure.

There are no impacts from the Proposed Project associated with tsunamis. Potential effects from seiches include flooding damage and related hazards in surrounding areas from spilling or sloshing waves, as well as increased pressure on containment structures. Both Crystal Springs Reservoir and the Notre Dame dam have emergency action plans. Potential impacts of the Proposed Project related to mudflow are reduced by California Building Code design provisions, geotechnical investigation requirements, and regulations in the Hillside Preservation District. In addition, Article IX, Section 7 of the Belmont Municipal Code requires permits for proposed construction in a mudslide area to determine that the proposed development is reasonably safe from mudslide

hazards. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to dam failure.

Land Use, Population, and Housing

The Cumulative Context of potential land use, population, and housing impacts is the Planning Area and surrounding jurisdictions. The type of linear project most likely to have the effect of physically dividing an established community would be a major new road, highway, or similar infrastructure, none of which are proposed in the Cumulative Context. In addition, if there were projects of this type, their impacts would be singular rather than cumulative. Similarly, there may be plans and projects in the Cumulative Context that conflict with existing plans, including habitat conservation plans, however the conflicts do not combine in effect.

However, potential impacts related to population and housing are cumulative in nature. Population growth, by itself, is not an environmental impact; however, the direct and indirect effects, such as housing and infrastructure needs that are related to population growth, can lead to physical environmental effects. San Mateo and San Carlos are expected to grow in population and number of jobs. However, implementation of the General Plans of both cities are expected to result in less population and employment growth than is expected by ABAG. Redwood City is also expected to experience population and job growth, but residential and commercial development is limited based on available water resources. Therefore, plans and projects in the Cumulative Context are not expected to induce substantial population growth. There are **less than significant cumulative impacts** related to land use, population, and housing.

The type of linear project most likely to have the effect of physically dividing an established community would be a major new road, highway, or similar infrastructure, none of which are proposed as a part of the Proposed Project. The Proposed Project does not allow for development of new neighborhoods distant or divided from established communities, and its focus on infill development could help integrate existing neighborhoods—a beneficial impact. Policies aim to improve connectivity between different areas of Belmont through both development as well as transportation options. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to dividing communities.

Since the Proposed Project would update policies and land use designations for future development, by its nature it is at times inconsistent with existing regulations. Adopted policies, specific plans, programs, and other implementing tools will be amended over time to conform to the Proposed Project. Amendments may also be needed from time to time to conform to State or federal law passed since adoption of the Proposed Project, and to eliminate or modify policies that may become obsolete or unrealistic due to changed conditions. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to conflict with applicable plans.

As noted under Impact 4.3-6 in Section 4.3 of this EIR, “Biological Resources,” there are no adopted Habitat Conservation Plans that include land within the Planning Area. The Proposed Project has **no cumulatively considerable** contribution to impacts related to conflict with conservation plans.

Implementation of the Proposed Project is estimated to result in population growth consistent with ABAG and C/CAG projections: approximately 4,100 people by 2035. With a population of 26,400

during base year 2013, this amounts to an annual growth rate of 0.66 percent. This population growth is small compared to the ABAG-projected population growth between 2015 and 2035 for the region of 1,427,000 people,⁹ which amounts to an annual growth of 0.88 percent. Furthermore, General Plan Policy 2.8-1 in the Proposed Project encourages infill development that would avoid unplanned development that could be induced through infrastructure expansions into new growth areas. This reduces the potential for unplanned, induced growth, even though the housing shortage in the San Francisco Peninsula results in the potential for any increase in employment to induce housing growth elsewhere. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to induced growth.

The majority of developed land in the Planning Area is composed of residential uses, which are not anticipated to undergo significant land use changes under the Proposed Project. The Proposed Project increases the capacity for the overall number of dwelling units and encourages the provision of lower- and moderate-income housing. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to displacement.

Noise

The discussion of noise impacts in Section 4.10 is inherently cumulative. The evaluation of impacts of the General Plan and BVSP development is representative of buildout conditions in the city and Planning Area, which is the Cumulative Context for cumulative impacts related to noise. Thus, each impact topic (construction noise, traffic noise, stationary source noise, vibration, etc.) is discussed in the context of a noise environment with ongoing and potentially overlapping development. Consequently, the impact significance conclusions discussed in Section 4.10 are representative of cumulative impacts. With regard to construction noise, while all projects would be subject to mitigation and BMPs, it would not be feasible to mitigate all potential construction noise and vibration levels from individual projects to a level that falls below the relevant noise standards. Given the potential for individual projects to be developed in proximity to one another, and in close proximity to sensitive receptors, particularly in the BVSP area, construction noise impacts would be **cumulatively significant**.

Development of past, present, and future plans and projects would result in long-term noise impacts from vehicles as more development projects are constructed, and cumulative traffic and the corresponding noise increases. The collective contribution of other, stationary noise and vibration sources in the Planning Area, such as mechanical equipment, car washes, auto shops, etc. could result in long-term noise impacts on noise-sensitive land uses in the Planning Area. Although existing levels of noise in many locations in the Planning Area already exceed the community noise exposure standards in both the existing and proposed General Plans (because of traffic noise), the effect of cumulative development within the Planning Area exacerbate these exceedances (as analyzed in Section 4.10). Policies in the General Plan and BVSP would reduce impacts from individual projects to the extent feasible. However, there would be a **significant cumulative impact** related to operational noise impacts.

⁹ ABAG. Forecasts and Projects. Available at <http://abag.ca.gov/planning/research/forecasts.html>. Accessed on November 9, 2016.

The Proposed Project's contribution to cumulative construction noise and vibration impacts would be **cumulatively considerable** because it would not be feasible to mitigate all potential construction noise and vibration levels from individual projects to a level that falls below the relevant noise standards.

The Proposed Project's contribution to cumulative traffic noise levels would be **less than cumulatively considerable** because the largest increase from the Proposed Project (i.e., all cumulative development in the City) on any one segment would be less than the threshold of perceptibility. Further, the future traffic volumes that form the basis of the noise analysis account for traffic passing through the Planning Area from surrounding jurisdictions. The Proposed Project has a less than **cumulatively considerable** contribution to impacts related to vibration from operational sources because the General Plan and BVSP policies would ensure that vibration is mitigated. The Proposed Project's contribution to impacts related to airport and aircraft noise is **less than cumulatively considerable** with respect to public airports (SFO, San Carlos Airport), and as there are no private airstrips within the Planning Area, the Proposed Project has **no cumulatively considerable** contribution to impacts related to airport and aircraft noise from private airstrips.

Public Services and Facilities

The Cumulative Context of potential land use, population, and housing impacts includes the Planning Area and surrounding jurisdictions. Public services are generally provided by local governments and/or special districts for areas within their jurisdiction and are not provided on a regional basis. Fire and police protection services are provided by local governments or fire protection districts for areas within their jurisdiction, although mutual aid agreements between agencies do help spread resources. Public schools are provided by school districts to areas within their jurisdictions. While districts may have cross jurisdictional boundaries, school services are still provided at the local, rather than regional, level. Several agencies provide park and recreation services in the region, including counties, cities, and special districts. Each of these areas has their own parkland ratios and standards and is responsible for providing parkland to meet the local demand. An increase in regional population may increase demand for parks and recreation facilities and services; however, these local jurisdictions have authority over land use, set and implement level of service standards, and determine the siting and timing of public service projects. The impacts on public services and facilities are not cumulative in nature, therefore, there is a **less than significant cumulative impact**.

The projected addition of approximately 4,100 residents by the buildout year would likely increase the Planning Area's demand for emergency fire response and preventive services. However, the majority of new development under the Proposed Project will be located in urbanized parts of the city near existing fire stations and within existing service areas, and individual development projects would be required to conduct environmental review pursuant to CEQA prior to approval. Further, the General Plan and BVSP policies ensure that the fire and police service standards will continue to be met and that services will be evaluated on an ongoing basis. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to fire and police services.

Population growth will also affect the number of students enrolled in schools in Belmont, and the projected school enrollment is higher than the designated capacity for both school districts that

serve the Planning Area. The siting of new schools is regulated by the California Department of Education, not the City of Belmont, although policies in the General Plan require the City to coordinate with the school districts on future school sites. In addition, Senate Bill (SB) 50 (Chapter 407, Statutes of 1998) governs the amount of fees that can be levied against new development. Payment of fees authorized by the statute is deemed “full and complete mitigation.” The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to schools.

The expected population increase would also place additional physical demands on existing parks. There is not enough parkland planned for in the Proposed Project to meet the parks standards set by the proposed General Plan. However, there is a sufficient amount of vacant land to meet future parkland needs within the Planning Area, and, policies in the General Plan require the City to ensure that new development contributes park impact fees, which will help the City achieve the parks standard. In addition, the Planning Area contains 294 acres of undeveloped, publicly accessible open space. Although this open space is not formally considered “parkland,” it provides additional opportunities for outdoor recreation within the Planning Area. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to parks.

Public Utilities

The Cumulative Context of potential land use, population, and housing impacts includes the Planning Area and surrounding jurisdictions. Growth in the region will result in increased water demand from additional development. To meet this growing demand in San Mateo County, the SFPUC has completed the Water Supply Diversification Program (WSDP) to upgrade the SFPUC Regional Water System. The WSDP includes recycled water strategies, conservation measures, installation of groundwater wells, and the development of a regional groundwater desalination project.¹⁰

Wastewater treatment and solid waste services are provided by individual jurisdictions or agencies and thus are not cumulative in nature. The South Bayside Sewer Authority (SBSA) provides wastewater treatment for Belmont, Redwood City, San Carlos, Menlo Park, Portola Valley, and portions of Atherton, Woodside, East Palo Alto, and San Mateo County. The SBSA has initiated a Capital Improvement Program to increase capacity and assure compliance with new environmental standards. The City of San Mateo Department of Public Works Environmental Services Division provides wastewater treatment in San Mateo and is expected to provide adequate capacity within its service area boundaries.¹¹ Waste from San Carlos, San Mateo, and Redwood City will be directed to the Ox Mountain Landfill. This landfill has an estimated closure date of 2023.¹² Although the area is expecting new development, most new development in the Cumulative Context will be infill, and therefore is not expected to result in a substantial increase in impervious surfaces. Within the BVSP Area, however, growth as a direct result of the BVSP will generate additional demand for water and wastewater services that will not be met by existing Capital Improvement Programs,

¹⁰ San Carlos 2030 General Plan Draft EIR
<http://cityofsancarlos.org/generalplanupdate/whats_new_/san_carlos_2030_general_plan_eir.asp>

¹¹ San Mateo General Plan EIR, 2009 <<http://www.cityofsanmateo.org/index.aspx?NID=1813>>

¹² CalRecycle Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn)(41-AA-0002) <<http://www.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail/>>

which is anticipated to require improvements to water and wastewater treatment facilities. Therefore, there is an expected expansion of existing water and wastewater treatment facilities as a result of the BVSP, resulting in a **significant cumulative impact**.

However, due to climate change, the amount of available water supply is unpredictable. An increase in the global average temperature attributable to climate change is expected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada.¹³ Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. Runoff is directly affected by changes in precipitation and snowpack. Changes in both the amount of runoff and the seasonality of the hydrologic cycle have the potential to greatly affect the heavily managed water systems of the western U.S. According to the California Energy Commission,¹⁴ the snowpack portion of the water supply could potentially decline by 30–90 percent by the end of the 21st century. A study cited in a report by the California Department of Water Resources (DWR) projects that approximately 50 percent of the statewide snowpack will be lost by the end of the century.¹⁵ Much uncertainty exists with respect to how climate change will affect future demand on water supply.¹⁶ Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in reservoir inflows.¹⁷ Although current forecasts are uncertain, it is evident that this phenomenon could lead to significant challenges in securing an adequate water supply for a growing population. Impacts in the Cumulative Context are considered **cumulatively significant**.

Implementation of the Proposed Project would result in future residential, commercial, office, and industrial uses in the Planning Area, resulting in additional population that would generate additional wastewater. Therefore, wastewater treatment needs would increase over current levels. Most of the wastewater generated in the Planning Area is treated at the SVCW treatment plant, which discharges the effluent to the San Francisco Bay. The SVCW treatment plant complies with CWA standards at the federal level, SWRCB standards at the state level, and waste discharge requirements set by NPDES Permit Nos. CA0038369, CA0038849, and No. CA0038873 as discussed in the Regulatory Setting. Current regulations require compliance with water quality

¹³ California Department of Water Resources. 2015 (June). California Climate Science and Data for Water Resources Management.

¹⁴ California Energy Commission (CEC). 2006. (July). Our Changing Climate: Assessing the Risks to California. Publication CEC-500-2006-077. Available: http://www.climatechange.ca.gov/biennial_reports/2006report/index.html.

¹⁵ Knowles, N., and D. R. Cayan. 2002. Potential Effects of Global Warming on the Sacramento/San Joaquin Watershed and the San Francisco Estuary. *Geophysical Research Letters* 29(18):1891.

¹⁶ California Department of Water Resources (DWR). 2006. (July). Progress on Incorporating Climate Change into Management of California's Water Resources. Technical Memorandum Report. Available: <http://baydeltaoffice.water.ca.gov/climatechange/reports.cfm>.

¹⁷ Kiparsky, M., and P. H. Gleick. 2003. Climate Change and California Water Resources: A Survey and Summary of the Literature. Prepared for California Energy Commission, Public Interest Energy Research Program.

Cayan, D., A. L. Luers, M. Hanemann, G. Granco, and B. Croes. 2006. Scenarios of Climate Change in California: An Overview. California Climate Change Center, State of California. White Paper, CEC-500- 2005-203-SF, March. Prepared by Pacific Institute for Studies in Development, Environment and Security, Oakland, CA.

standards and these measures would preclude development lacking adequate utility capacity, including wastewater treatment capacity. Individual developments would be reviewed by the City and the applicable wastewater providers to determine whether sufficient sewer capacity exists to serve the additional population that would be generated by the future projects. The City will continue to coordinate with the wastewater districts to ensure that new development would not exceed the capacity of wastewater conveyance and treatment facilities, and that new development would pay development fees to increase capacity of those facilities. Furthermore, the proposed General Plan contains policies that work to ensure wastewater treatment requirements are not exceeded. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to wastewater treatment requirements.

Implementation of the Proposed Project would result in future residential, commercial, and industrial land uses in the Planning Area, resulting in additional population. Additional population would generate additional demand for water and wastewater services, and therefore, an increased demand for water provision and wastewater collection, conveyance, and treatment services over currently established levels. According to the 2015 Urban Water Management Plan (UWMP), MPWD's water supply is sufficient to meet current and projected demands in the Planning Area. Similarly, the existing wastewater system is adequate in accommodating the anticipated flow in average and peak dry weather flow conditions by 2030. While anticipated wet weather inflow and infiltration during wet weather events is expected to exceed the existing system capacity by 2030, on-going Capital Improvement Programs for the rehabilitation and replacement of the wastewater system to address deferred sewer capital needs, including proposed flow equalization programs in SVCW's service area, will accommodate the projected wet weather flow. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to water and wastewater facilities.

Development under the Proposed Project would allow for the redevelopment of existing developed areas that would generate increased stormwater volumes in portions of Belmont. Increased flows would in turn create a need for new infrastructure in growth areas, to accommodate infiltration of stormwater or to convey stormwater to detention basins to prevent flooding. Proposed General Plan Policy 6.2-10 ensures continued compliance from the City with the Regional Stormwater Permit (MRP) as well as NPDES permits that are issued to entities in Belmont that have stormwater discharges. Any future stormwater drainage projects in the city would be required to conduct environmental review pursuant to CEQA prior to approval. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to stormwater facilities.

Water demand in the Mid-Peninsula Water District (MPWD) is expected to grow over the planning horizon, and the buildout water demand is projected to reach approximately 1,231 million gallons (MG) in the year 2035. However, the water supply in 2035 is expected to equal 1,420 MG. Therefore, the water supply is expected to be adequate to meet the needs resulting from implementation of the Proposed Project. In addition, policies in the Proposed Project expand water conservation programs and reduce per capita water use. In the BVSP Area, however, anticipated growth as a result of the BVSP will directly result in the need over the next two decades for water lines throughout the BVSP Area to be upgraded. Mitigation Measure UTIL-1 requires the upgrading of 6-inch lines to 8-inch lines over time as development intensification within the area occurs, with any physical improvements subject to project-level environmental review as needed.

With mitigation, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to water supply.

Implementation of the Proposed Project is expected to result in wastewater collection, conveyance, and treatment needs over current levels. Considering all ongoing and planned improvements, the existing wastewater system is adequate in accommodating the anticipated flow in average and peak dry weather flow conditions by 2030. While anticipated wet weather inflow and infiltration during wet weather events is expected to exceed the existing system capacity by 2030, on-going Capital Improvement Programs for the rehabilitation and replacement of the wastewater system to address deferred sewer capital needs will accommodate the projected wet weather flow regardless of the adoption of the General Plan and Phase I Zoning. Policies in the Proposed Project help ensure that the additional capacity will be developed. In addition, current regulations require compliance with water quality standards and would not allow development without adequate utility capacity, including wastewater treatment capacity. In the BVSP Area, however, anticipated growth as a result of the BVSP will directly result in the need for the upsizing of sewer lines as well as the Shoreway Pump Station, potentially having a significant impact due to expansion of wastewater facilities. Mitigation Measure UTIL-2 requires upsizing approximately 1,675 feet of sewer lines downstream of the BVSP Area, while Mitigation Measure UTIL-3 requires upsizing of the Shoreway Pump Station. With mitigation, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to wastewater treatment capacity.

Implementation of the Proposed Project would result in future residential, commercial, and industrial land uses in the Planning Area, resulting in additional population and increased solid waste generation within the city. AB 939 requires local governments to divert 50 percent of their community's solid waste, and CalRecycle set a goal of 75 percent recycling, composting, or source reduction of solid waste by 2020. The disposal targets for Belmont were met for both residential and employment disposal for the years 2013-2015. Of the four landfills that accept more than one percent of Belmont's solid waste, only Ox Mountain has an estimated closure date before 2045. Given the city's ability to meet its diversion targets, as well as the remaining capacity in area landfills, meeting the collection, transfer, recycling, and disposal needs of the projected population anticipated in the Proposed Project is not expected to exceed existing permitted solid waste disposal capacity. The Proposed Project has a **less than cumulatively considerable** contribution to impacts related to solid waste disposal capacity.

Development of future land uses and projects would be required to comply with federal, state, and local statutes and regulations related to solid waste; therefore, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to compliance with regulations.

Transportation

The Cumulative Context for cumulative impacts related to transportation is the roadway network within the Planning Area and the regional roadway network with connections to the Planning Area. The transportation analysis represents a cumulative analysis of transportation conditions through 2035. Buildout of the Proposed Project would result in increased development in the Planning Area and would generate additional vehicle trips on the local and regional roadway network. These vehicle trips would result in vehicle delay impacts at 13 study intersections, turn lane impacts at 21 study intersections, vehicle queuing impacts at 27 study intersections, CMP Arterial Roadway

impacts along El Camino Real, CMP Freeway impacts on all 12 study freeway segments, and emergency access resulting in a **significant cumulative impact** related to transportation.

With the projected 2035 plus Project traffic volumes and the completion of projects identified in the General Plan and BVSP, as well as those projects identified in the City of Belmont's Capital Improvement Plan, 13 study intersections would have potentially significant impacts as defined in the City of Belmont's Guidelines for Traffic Impact Studies.

A warrant analysis was performed to determine potential impacts associated with the City's Guidelines regarding turn lane warrants at all locations where turn lanes are not included as part of the proposed Plans. There are 25 intersection approaches where the 2035 plus Project volumes exceed turn lane warrant criteria levels and/or project-generated traffic increases peak hour volume by more than one-percent compared to existing conditions at locations which exceeded the turn lane warrant criteria and are considered potentially significant based on the City's Guidelines for intersection turn lane warrants.

Under 2035 plus Project Conditions, the projected maximum queues in pockets at the study intersections were determined using the SIMTRAFFIC application of Synchro, and averaging the maximum projected queue for each of ten runs. The City's Guidelines outline that there would be a potentially significant impact if the queue length exceeds the storage capacity or if Base Case (i.e., existing conditions) volumes already create vehicle queues exceeding turn lane capacity and the project traffic increases vehicle queues by one percent. At 27 of the 45 study intersections projected queues exceed the storage capacity and increase the maximum queue by at least one vehicle and are considered potentially significant based on the City's Guidelines for intersection queuing impacts. Therefore, the Proposed Project has a **cumulatively considerable** contribution to impacts related to the study intersections.

El Camino Real is part of the C/CAG CMP Arterial Roadway network and under 2035 plus Project Conditions is expected to operate at LOS E north of Ralston Avenue and LOS F south of Ralston Avenue during the p.m. peak hour. As part of the Proposed Project there would not be a reduction in travel lanes or other changes to the roadway configuration that would affect arterial segment performance. The Proposed Project would be expected to cause the intersection of El Camino Real/Ralston Avenue to operate at LOS F during both a.m. and p.m. peak hours, and the Proposed Project would add trips to the CMP roadway and exceed the LOS criterion established by C/CAG. Therefore, the Proposed Project has a **cumulatively considerable** contribution to impacts related to the CMP Arterial Roadway network.

The change to traffic associated with full development of the General Plan and BVSP were added to projected freeway traffic volumes to obtain 2035 plus Project volumes. The proposed Plans are projected to cause a greater than a one percent increase in volume on all freeway segments operating deficiently under existing conditions. On the freeway segments operating acceptably under Existing Conditions, the projected traffic volumes would be expected increase the volume-to-capacity ratio above 1.00, resulting in LOS F operations. Therefore, the Proposed Project has a **cumulatively considerable** contribution to impacts related to the CMP Freeway network.

Increased congestion along El Camino Real and other roadways in the study area could affect emergency vehicle response times, especially during commute times. However, it is difficult to

determine to what extent congestion affects the response times for emergency vehicles because response times differ based on the time of day, the use of the emergency vehicles' sirens, the use of the emergency vehicles' signal priority preemption equipment to turn traffic signals red to stop traffic to allow the emergency vehicles to pass through the intersection, and the frequency of emergency calls. Nonetheless, the effects of the Proposed Project and other development in the City at study intersections (including changes to average vehicle delay) and on applicable roadway segments themselves (i.e., queues) have been evaluated and reported. Thus, to the extent that the Proposed Project would affect average vehicle delay, there could be a corresponding change to the response times for emergency vehicles traveling through these locations. Therefore, the Proposed Project has a **cumulatively considerable** contribution to impacts related to emergency access.

The BVSP includes new pedestrian and bicycle connections within the Belmont Village area, and the proposed General Plan reinforces the improvements identified in the draft Comprehensive Pedestrian and Bicycle Master Plan. The transit-oriented development pattern of the BVSP creates a diverse mix of land uses, resulting in a concentration of housing, jobs, and shopping all within walking and biking distance of one another. The Proposed Project emphasizes multimodal circulation, accommodating vehicular traffic but at a slower pace that could substantially improve safety for pedestrians and cyclists compared to traditional higher-speed roadway systems. Pedestrian and bicycle activity is likely to increase proportionally to increases in traffic volume in the Planning Area. Primary pedestrian crossings on major streets would occur at either signals or roundabouts, both of which include specific provisions to minimize conflicts between vehicular traffic and non-motorized transportation users. Therefore, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to the pedestrian and bicycle network.

By concentrating new jobs, housing, and shopping in a transit-oriented development pattern surrounding the Belmont Caltrain Station, the proposed General Plan and BVSP are, by design, intended to increase transit ridership and reduce dependence on private automobile travel. The Proposed Project also emphasizes improvements to pedestrian and bicycle connectivity to transit, further increasing the convenience and utility of using transit. Increases in transit ridership are directly tied to the need for additional transit facilities, as well as increased pedestrian and bicycle activity on routes to and from transit stops.

As part of the Grand Boulevard Multimodal Transportation Corridor Plan, bus rapid transit along the El Camino Real corridor could increase bus transit ridership. SamTrans expects about three percent ambient growth system-wide; however, this would not be uniform in all areas. The transit-oriented development pattern of the BVSP could increase transit ridership at a faster rate than projected by SamTrans. The *Caltrain Modernization Program Final Environmental Impact Report* includes a projection of approximately double the daily boardings at the Belmont Caltrain Station with and without the implementation of the Modernization Program. Buildout of the proposed General Plan and BVSP could further increase ridership on Caltrain. Therefore, the Proposed Project has a **less than cumulatively considerable** contribution to impacts related to transit ridership.

Improvements to the transportation and circulation system within and surrounding the Planning Area would be implemented over time. Any such improvements would be designed and constructed to local, regional, and Federal standards, and as such, would not be expected to

introduce any hazardous design features. Therefore, the Proposed Project has a **less than cumulatively considerable** contribution to impacts to the roadway design.

6.3 Significant and Unavoidable Impacts

Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. According to CEQA Guidelines 15126(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program. Chapter 4 identified the following significant unavoidable impacts when comparing the Proposed Project to existing conditions:

AIR QUALITY

While the proposed General Plan and the BVSP would be consistent with the BAAQMD's regional air quality strategy, individual development projects may still generate construction and operational emissions in excess of BAAQMD's project-level thresholds. Mitigation measures would address operational-related emissions, and implementation of the comprehensive suite of proposed General Plan and BVSP policies would also reduce the severity of growth-oriented criteria pollutants by reducing VMT, encouraging transit, fostering bicycle and pedestrian infrastructure, and supporting sustainable land use patterns, including mixed-use design and increased density. However, even with implementation of the proposed General Plan and BVSP policies and the recommended mitigation measures, impacts from short-term construction and long-term operation would remain significant and unavoidable. These emissions would also result in a cumulatively considerable air quality impact within the San Francisco Bay Area Air Basin (SFBAAB).

The Proposed Project may expose sensitive receptors to substantial toxic air contaminants (TAC) concentrations. Based on an inventory of existing stationary, roadway, and railway sources, several locations within the Planning Area include sources currently in excess of BAAQMD's project-level and cumulative health risk thresholds. The proposed General Plan and BVSP both include policies to minimize risks to future residents. Operation of new stationary sources developed under the plans would be subject to the permit authority of the BAAQMD, which prohibits sources with health risks in excess of air district thresholds. Construction activities of future development may expose existing and future receptors to significant health risks. Mitigation measures would reduce construction-related emissions and provide a project-level evaluation of construction-related health risks from future projects within 1,000 feet of sensitive receptors. Despite these measures, there may be instances where project-specific conditions preclude the reduction of health risks below adopted thresholds, resulting in a significant and unavoidable impact.

NOISE

The Proposed Project would result in both short-term and long-term changes to the existing noise environment in the Planning Area. Construction noise associated with future development that would be supported by the Proposed Project could expose sensitive receptors to noise levels that exceed the noise standards set forth in both the existing and proposed General Plan. Compliance with the time-of-day restrictions and noise muffling requirements for new construction in the

City's Noise Ordinance, as well as the noise-reducing policies included in the proposed General Plan and BVSP, would reduce impacts on sensitive receptors to the extent feasible. However, even with these measures, it may not be feasible in all cases to mitigate construction noise of individual projects to a less-than-significant level. Thus, impacts from construction noise would be significant and unavoidable.

Construction activity could expose people to excessive groundborne vibration. Proposed General Plan policies would require that developers mitigate any vibration impacts on sensitive land uses to the extent feasible. However, even with these measures, it may not be feasible in all cases to mitigate vibration from individual construction projects to a less-than-significant level at all sensitive receptors. Thus, impacts from construction vibration would be significant and unavoidable.

Changes in operational traffic noise as a result of the Proposed Project would be above the General Plan noise exposure standards for single-family residential uses in some locations as compared to existing conditions. This impact would be significant and unavoidable.

TRANSPORTATION

Proposed improvements at the study intersections through Mitigation Measures 4.12-1a – 4.12-1m would mitigate the intersection delay impacts below levels of significance; however, the proposed improvements would be infeasible given the existing physical constraints, required coordination and approval from Caltrans and San Mateo County, and non-compliance adopted plans, resulting in significant and unavoidable impacts at the following intersections:

- 1. Ralston Ave/SR 92 WB Ramps
- 8. Ralston Ave/Alameda de las Pulgas
- 10. Ralston Avenue/Chula Vista Drive
- 11. Ralston Avenue/Notre Dame University Road
- 13. Ralston Avenue/Sixth Avenue
- 15. Ralston Avenue/El Camino Real
- 16. Ralston Avenue/Old County Road
- 24. Alameda de las Pulgas/Chula Vista Drive
- 29. El Camino Real/Flashner Lane
- 32. El Camino Real/O'Neill Avenue
- 33. El Camino Real/Harbor Boulevard (North)
- 36. Old County Road/O'Neill Avenue
- 37. Old County Road/Harbor Boulevard

The addition, through Mitigation Measure 4.12-1p of turn lanes to 21 intersections would require substantial right-of-way acquisition along built out corridors. Secondary impacts resulting from the addition of turn lanes at these locations include non-compliance with policies contained within the Grand Boulevard Initiative, Ralston Avenue Corridor Study and Improvement Plan, the City's

Complete Streets initiatives, the BVSP vision, and policy directives for safe and efficient active transportation. Implementation of the General Plan, BVSP, and CAP policies and actions may partially mitigate the impact, however the addition of turn lanes is not considered feasible mitigation for the reason summarized above. Consequently, this impact would not be mitigated and, as a result, the Project's impact at the intersections would remain significant and unavoidable.

Areawide roadways are currently operating under saturated conditions (from a vehicular congestion standpoint), and would continue to do so under 2035 plus Project Conditions. The addition of storage to any of the impacted turn lanes would allow for additional vehicles to access these turn lanes, but would not result in reduced queue lengths that generally extend the length of the roadway segments. In order to alleviate area wide queueing, additional through lanes would need to be constructed throughout the network, through Mitigation Measure 4.12-1q, to provide sufficient capacity to serve traffic demand. However, the addition of through lanes would result in secondary impacts, including increasing VMT; non-compliance with policy contained within the GBI, Complete Streets initiatives, and active mode accessibility; and fiscal constraints due to the need to acquire right-of-way along built out corridors. Implementation of the General Plan, BVSP, and CAP policies and actions may partially mitigate the impact. Consequently, this impact would not be mitigated and, as a result, the impact at the intersections would remain significant and unavoidable.

In order to reduce the Project's impact on the El Camino Real roadway segments, additional travel lanes along the corridor would need to be constructed, through Mitigation Measure 4.12-2, to provide sufficient capacity to serve traffic demand. However, the addition of through lanes would result in secondary impacts, including increasing VMT; non-compliance with policy contained within the Grand Boulevard Initiative, Complete Streets initiatives, and active mode accessibility; and fiscal constraints due to the need to acquire right-of-way along built out corridors. Implementation of the General Plan, BVSP, and CAP policies and actions may partially mitigate the impact. Consequently, this impact would not be mitigated and, as a result, the impact on the CMP Arterial Roadway network would remain significant and unavoidable.

In order to reduce the Project's impact on the study freeway segments, additional travel lanes would need to be constructed, through Mitigation Measure 4.12-3, to provide sufficient capacity to serve traffic demand. However, the addition of through lanes would result in secondary impacts, including increasing VMT and fiscal constraints due to the need to acquire right-of-way along built out corridors. It should be noted, that any improvements freeway segment improvements would be coordinated and approved by Caltrans. Implementation of the General Plan, BVSP, and CAP policies and actions may partially mitigate the impact. Consequently, this impact would not be mitigated and, as a result, the impact at the roadway segments would remain significant and unavoidable.

Signal priority preemption equipment and strict adherence to emergency vehicle passing priority under state law could reduce the Proposed Project's impact on emergency access; however, these mitigations cannot be accurately measured at study intersections or on applicable segments at this time, and as a result the impacts to emergency access would remain significant and unavoidable.

6.4 Significant Irreversible Environmental Change

CEQA Guidelines require an EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (CEQA Guidelines Section 15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land or waterways. Irretrievable commitments of non-renewable resources associated with the Proposed Project include:

WATER CONSUMPTION

New development under the Proposed Project will increase the demand for water supplies for residential, commercial and industrial uses. It would place a greater demand on MPWD, which currently purchases all of its water from the SFPUC. Most of the Planning Area’s water is drawn from the Sierra Nevada mountains through the Hetch Hetchy Regional System, and the rest is produced by the SFPUC from its local watersheds and facilities in Alameda and San Mateo Counties. This increased demand for public water represents an irreversible environmental change.

ENERGY SOURCES

New development under the Proposed Project would result in increased energy use, in the form of new buildings and transportation. Both residential and nonresidential development use electricity, natural gas, and petroleum products for power, lighting, heating, and other indoor and outdoor services, while cars use both oil and gas. Belmont joined the Peninsula Clean Energy Authority in 2016, a Community Choice Aggregation program that allows customers to choose among multiple power options, with varying levels of renewable energy content. While this program will enable Belmont to significantly increase its use of renewable energy resources over time, consumption of nonrenewable energy will still continue in the future, and will likely increase overall as a result of new development. This represents an irreversible environmental change.

CONSTRUCTION-RELATED IMPACTS

Irreversible environmental changes could also occur during the course of constructing development projects made possible by the Proposed Project. New construction would result in the consumption of building materials, such as lumber, sand, and gravel for construction. Resources that supply building materials are already being depleted locally and worldwide.

6.5 Impacts Found Not to Be Significant

CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to be not significant. Chapter 4 of this Program EIR discusses all potential impacts, regardless of their magnitude. A similar level of analysis is provided for impacts found to be less than significant as impacts found to be significant. Significance of an impact is assessed in relation to the significance criteria provided in each section in Chapter 4. A summary of all impacts is provided in the Executive Summary of this Program EIR.

