



Housing Element Update

Draft Environmental Impact Report SCH#2021070090

prepared by

City of Belmont

Planning Division, Department of Community Development
1 Twin Pines Lane
Belmont, California 94002

Contact: Jennifer Rose, Housing, Economic Development, & Finance Manager

prepared with the assistance of

Rincon Consultants, Inc.

449 15th Street, Suite 303
Oakland, California 94612

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Table of Contents

Acronyms and Abbreviations.....	ix
Executive Summary	ES-1
Project Synopsis.....	ES-1
Project Objectives.....	ES-2
Alternatives.....	ES-2
Areas of Known Controversy	ES-3
Issues to be Resolved.....	ES-3
Issues Not Studied in Detail in the EIR.....	ES-3
Summary of Impacts and Mitigation Measures	ES-3
1 Introduction.....	1-1
1.1 Statement of Purpose	1-1
1.2 Environmental Impact Report Background	1-1
1.2.1 Streamlining Under Senate Bill 226.....	1-2
1.2.2 Other Tiering Opportunities	1-3
1.3 Purpose and Legal Authority.....	1-3
1.4 Public Review and Participation Process	1-4
1.5 Scope and Content.....	1-4
1.6 Issues Found to be Less than Significant.....	1-5
1.6.1 Agriculture and Forestry Resources	1-5
1.6.2 Mineral Resources	1-6
1.7 Lead, Responsible, and Trustee Agencies	1-7
1.8 Environmental Review Process.....	1-7
2 Project Description	2-1
2.1 Project Title.....	2-1
2.2 Lead Agency Name and Address.....	2-1
2.3 Lead Agency Contact Person.....	2-1
2.4 Project Location	2-1
2.5 Existing Sites Characteristics.....	2-5
2.5.1 Current Land Use Designations and Zoning.....	2-5
2.5.2 Surrounding Land Uses	2-5
2.6 Project Characteristics	2-5
2.6.1 Housing Element Update.....	2-5
2.6.2 RHNA Allocation	2-6
2.6.3 Zoning and General Plan Amendments	2-6
2.6.4 Project Buildout	2-9

2.7	Project Objectives	2-9
2.8	Required Approvals.....	2-10
3	Environmental Setting	3-1
3.1	Regional Setting	3-1
3.2	Draft Housing Opportunity Sites Setting.....	3-1
3.3	Cumulative Development	3-1
4	Environmental Impact Analysis	4-1
4.1	Aesthetics.....	4.1-1
4.1.1	Setting.....	4.1-1
4.1.2	Regulatory Setting	4.1-11
4.1.3	Impact Analysis	4.1-15
4.1.4	Cumulative Impacts	4.1-20
4.2	Air Quality	4.2-1
4.2.1	Setting.....	4.2-1
4.2.2	Regulatory Setting	4.2-6
4.2.3	Impact Analysis	4.2-9
4.2.4	Cumulative Impacts	4.2-23
4.3	Biological Resources.....	4.3-1
4.3.1	Environmental Setting	4.3-1
4.3.2	Regulatory Setting	4.3-8
4.3.3	Impact Analysis	4.3-14
4.3.4	Cumulative Impacts	4.3-19
4.4	Cultural Resources	4.4-1
4.4.1	Setting.....	4.4-1
4.4.2	Regulatory Setting	4.4-12
4.4.3	Impact Analysis	4.4-18
4.4.4	Cumulative Impacts	4.4-21
4.5	Energy	4.5-1
4.5.1	Setting.....	4.5-1
4.5.2	Regulatory Setting	4.5-3
4.5.3	Impact Analysis	4.5-9
4.5.4	Cumulative Impacts	4.5-17
4.6	Geology and Soils	4.6-1
4.6.1	Setting.....	4.6-1
4.6.2	Regulatory Setting	4.6-14
4.6.3	Impact Analysis	4.6-19
4.6.4	Cumulative Impacts	4.6-27
4.7	Greenhouse Gas Emissions	4.7-1
4.7.1	Setting.....	4.7-1

4.7.2	Regulatory Setting	4.7-5
4.7.3	Impact Analysis	4.7-12
4.7.4	Cumulative Impacts	4.7-21
4.8	Hazards and Hazardous Materials	4.8-1
4.8.1	Setting.....	4.8-1
4.8.2	Regulatory Setting	4.8-8
4.8.3	Impact Analysis	4.8-12
4.8.4	Cumulative Impacts	4.8-18
4.9	Hydrology and Water Quality	4.9-1
4.9.1	Setting.....	4.9-1
4.9.2	Regulatory Setting	4.9-1
4.9.3	Impact Analysis	4.9-10
4.9.4	Cumulative Impacts	4.9-18
4.10	Land Use and Planning.....	4.10-1
4.10.1	Setting.....	4.10-1
4.10.2	Regulatory Setting	4.10-5
4.10.3	Impact Analysis	4.10-8
4.10.4	Cumulative Impacts	4.10-15
4.11	Noise	4.11-1
4.11.1	Project Noise Setting	4.11-3
4.11.2	Regulatory Setting	4.11-6
4.11.3	Impact Analysis	4.11-12
4.11.4	Cumulative Impacts	4.11-21
4.12	Population and Housing.....	4.12-1
4.12.1	Setting.....	4.12-1
4.12.2	Regulatory Setting	4.12-2
4.12.3	Impact Analysis	4.12-5
4.12.4	Cumulative Impacts	4.12-9
4.13	Public Services and Recreation	4.13-1
4.13.1	Setting.....	4.13-1
4.13.2	Regulatory Setting	4.13-7
4.13.3	Impact Analysis	4.13-13
4.13.4	Cumulative Impacts	4.13-20
4.14	Transportation	4.14-1
4.14.1	Environmental Setting	4.14-1
4.14.2	Regulatory Setting	4.14-7
4.14.3	Impact Analysis	4.14-15
4.14.4	Cumulative Impacts	4.14-23

4.15	Tribal Cultural Resources	4.15-1
4.15.1	Setting.....	4.15-1
4.15.2	Regulatory Setting	4.15-2
4.15.3	Impact Analysis	4.15-3
4.15.4	Cumulative Impacts	4.15-5
4.16	Utilities and Service Systems	4.16-1
4.16.1	Setting.....	4.16-1
4.16.2	Regulatory Setting	4.16-4
4.16.3	Impact Analysis	4.16-9
4.16.4	Cumulative Impacts	4.16-15
4.17	Wildfire	4.17-1
4.17.1	Setting.....	4.17-1
4.17.2	Regulatory Setting	4.17-6
4.17.3	Impact Analysis	4.17-12
4.17.4	Cumulative Impacts	4.17-16
5	Other CEQA Required Discussions.....	5-1
5.1	Growth Inducement.....	5-1
5.1.1	Population Growth	5-1
5.1.2	Economic Growth	5-2
5.1.3	Removal of Obstacles to Growth.....	5-2
5.2	Irreversible Environmental Effects.....	5-2
5.3	Mandatory Findings of Significance	5-3
5.3.1	Secondary Effects	5-3
6	Alternatives.....	6-1
6.1	Alternative 1: No Project Alternative.....	6-2
6.1.1	Description.....	6-2
6.1.2	Impact Analysis	6-2
6.2	Alternative 2: Increased Density/Height.....	6-7
6.2.1	Description.....	6-7
6.2.2	Impact Analysis	6-9
6.3	Alternatives Considered but Rejected	6-15
6.4	Environmentally Superior Alternative	6-16
7	References	7-1
7.1	Bibliography	7-1
7.2	List of Preparers	7-21

Tables

Table ES-1	Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts	ES-4
Table 1-1	NOP Comments and EIR Response	1-4

Table 2-1	RHNA Allocation and Percentage of Income Distribution for Belmont	2-6
Table 4.1-1	State-designated Scenic Highways in San Mateo County	4.1-11
Table 4.2-1	Federal and State Ambient Air Quality Standards	4.2-2
Table 4.2-2	Ambient Air Quality at Nearest Monitoring Stations.....	4.2-5
Table 4.2-3	BAAQMD Criteria Air Pollutant Screening Levels.....	4.2-10
Table 4.2-4	BAAQMD Criteria Air Pollutant Significance Thresholds.....	4.2-11
Table 4.2-5	BAAQMD Odor Source Thresholds.....	4.2-12
Table 4.2-6	Draft Housing Opportunity Sites Requiring Additional Construction Mitigation Measures.....	4.2-16
Table 4.2-7	Modeled Project (40 Units) Construction Emissions	4.2-17
Table 4.4-1	Known Historical Resources.....	4.4-6
Table 4.4-2	Draft Housing Opportunity Sites with Buildings or Structures Older than 45 Years of Age	4.4-11
Table 4.5-1	Annual and Daily Transportation Energy Consumption in San Mateo County and the City of Belmont	4.5-2
Table 4.5-2	Project Construction Energy Usage.....	4.5-11
Table 4.5-3	Project Operational Energy Usage	4.5-12
Table 4.5-4	Consistency with State Renewable Energy and Energy Efficiency Plans	4.5-13
Table 4.5-5	Consistency with the City General Plan and Climate Action Plan.....	4.5-16
Table 4.6-1	Draft Housing Opportunity Sites within or near Liquefaction Zones.....	4.6-4
Table 4.6-2	Draft Housing Opportunity Sites Within a Landslide Areas	4.6-7
Table 4.7-1	Estimated Construction GHG Emissions	4.7-16
Table 4.7-2	Operational GHG Emissions	4.7-17
Table 4.7-3	ABAG/MTC Plan Bay Area 2040 Consistency for GHG Emissions	4.7-18
Table 4.7-4	City of Belmont General Plan 2035 Consistency for GHG Emissions	4.7-19
Table 4.7-5	City of Belmont CAP Consistency	4.7-20
Table 4.8-1	Hazardous Material Sites within 50 feet of Draft Housing Opportunity Sites	4.8-4
Table 4.8-2	Hazardous Material Sites within 100 feet of Draft Housing Opportunity Sites	4.8-4
Table 4.8-3	Hazardous Material Sites within 0.25-mile of a School	4.8-6
Table 4.9-1	Designated Beneficial Uses	4.9-7
Table 4.10-1	Existing Land Use Summary for Belmont 2035 General Plan	4.10-1
Table 4.10-2	Existing Land Use Summary for BVSP Area	4.10-3
Table 4.10-3	Project Consistency with Applicable General Plan Goals and Policies.....	4.10-11
Table 4.11-1	AASHTO Maximum Vibration Levels for Preventing Damage.....	4.11-3
Table 4.11-2	Vibration Annoyance Potential Criteria	4.11-3
Table 4.11-3	Transportation and Stationary Noise Limits	4.11-9
Table 4.11-4	Community Noise Exposure Matrix	4.11-10
Table 4.11-5	Exterior Noise Standards.....	4.11-11
Table 4.11-6	Construction Equipment Noise Levels	4.11-14
Table 4.11-7	Typical Vibration Levels for Construction Equipment.....	4.11-15

Table 4.12-1	2021 Population, Households, and Housing Unit Estimates.....	4.12-1
Table 4.12-2	ABAG Population, Housing, and Employment Forecasts	4.12-2
Table 4.13-1	Belmont Fire Protection District Staffing by Divisions	4.13-1
Table 4.13-2	Belmont Police Protection Staffing by Divisions	4.13-1
Table 4.13-3	BRSSD and Carlmont High School Student Enrollment and Capacity for 2019-2020	4.13-2
Table 4.13-4	Parks, Recreation Facilities, and Open Space Inventory	4.13-4
Table 4.14-1	Vehicle Miles Traveled (VMT) Estimates by Analysis Scenario	4.14-18
Table 4.14-2	Proposed Housing Units by Traffic Analysis Zone (TAZ).....	4.14-19
Table 4.16-1	Solid Waste Disposal Operations	4.16-3
Table 4.16-2	Normal Year Supply and Demand Comparison.....	4.16-11
Table 4.16-3	Single Dry Year Supply and Demand Comparison with BDP	4.16-11
Table 4.16-4	Single Dry Year Supply and Demand Comparison without BDP	4.16-11
Table 4.16-5	Multiple Dry Years Supply and Demand Comparison with BDP	4.16-11
Table 4.16-6	Multiple Dry Years Supply and Demand Comparison without BDP	4.16-12
Table 4.17-1	Distance to VHFHSZ for Select Draft Opportunity Sites	4.17-5
Table 6-1	Comparison of Project Alternatives’ Buildout Characteristics	6-2
Table 6-2	Impact Comparison of Alternatives	6-17

Figures

Figure 1-1	Environmental Review Process	1-10
Figure 2-1	Regional Location	2-2
Figure 2-2	Potential Sites – West	2-3
Figure 2-3	Potential Sites – East.....	2-4
Figure 2-4	Sites with a 65 foot Max Height Limit	2-7
Figure 4.1-1	Geographic Sub-areas Along El Camino Real	4.1-2
Figure 4.1-2	View of Development along El Camino Real at the Northern City Limit Looking Northeast	4.1-3
Figure 4.1-3	Four-Story Condos West of El Camino Real at Davey Glen Road.....	4.1-4
Figure 4.1-4	Light Industrial Buildings East of El Camino Real and the Train Tracks.....	4.1-4
Figure 4.1-5	Shopping Center at Ralston Avenue and El Camino Real.....	4.1-5
Figure 4.1-6	View of Storefronts along El Camino Real Looking Northwest	4.1-5
Figure 4.1-7	View from Ralston Avenue and El Camino Real	4.1-6
Figure 4.1-8	View of Elevated Railroad Alignment Northeast of El Camino Real	4.1-7
Figure 4.1-9	Corner of Harbor Boulevard and 5th Avenue Looking East with Commercial Development Visible on the Downhill Slope at El Camino Real.....	4.1-8
Figure 4.1-10	View Looking Northeast from 6th Avenue Across Draft Housing Opportunity Sites.....	4.1-8
Figure 4.1-11	View Looking Northeast from South Road Across Draft Housing Opportunity Sites	4.1-9
Figure 4.1-12	Example Hillside Neighborhood View from North Road looking East	4.1-10

Figure 4.1-13	Example Hillside Neighborhood View from Harbor Boulevard.....	4.1-10
Figure 4.3-1	Wetlands in Belmont.....	4.3-2
Figure 4.3-2	Critical Habitat in Belmont.....	4.3-5
Figure 4.4-1	Location of Known Historical Resources and Draft Housing Opportunity Sites	4.4-9
Figure 4.6-1	Draft Housing Opportunity Sites Near Fault Zones.....	4.6-3
Figure 4.6-2	Liquefaction Zones	4.6-6
Figure 4.6-3	Draft Housing Opportunity Sites within Landslide Zones	4.6-9
Figure 4.6-4	Geologic Units and Paleontological Sensitivity Within the City of Belmont	4.6-12
Figure 4.8-1	Hazardous Material Sites within the City.....	4.8-5
Figure 4.8-2	Hazardous Material Sites within 0.25-mile of a School	4.8-7
Figure 4.9-1	Flood Hazard Zones Near Belmont	4.9-3
Figure 4.11-1	Projected Future Noise Contours and Draft Housing Opportunity Sites	4.11-5
Figure 4.13-1	Public Safety Facilities	4.13-2
Figure 4.13-2	Existing Parks and Recreation Facilities	4.13-5
Figure 4.14-1	Existing Transit Routes	4.14-6
Figure 4.14-2	Existing Bike Facilities.....	4.14-14
Figure 4.14-3	Methodology for Calculating VMT	4.14-16
Figure 4.14-4	Draft Housing Opportunity Sites in relation to VMT Screening Buffer Areas	4.14-20
Figure 4.17-1	Fire Hazard Severity Zones Near Belmont	4.17-3
Figure 6-1	Alternative 2: Increased Density/Height Sites	6-8

Appendices

Appendix AQ	California Emissions Estimator Model Outputs
Appendix BIO	Special-Status Plant Species Tables
Appendix NOP	Notice of Preparation and Comment Letters
Appendix NRG	Energy Calculations
Appendix PS	Public Services and Recreation Contact Log
Appendix SITE	Draft Housing Opportunity Sites Table
Appendix TRA	Transportation Impact Assessment

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Acronyms and Abbreviations

AASHTO	American Association of State Highway and Transportation Officials
ABAG	Association of Bay Area Governments
BAAQMD	Bay Area Air Quality Management District
BCDB	San Francisco Bay Conservation and Development Commission
BFPD	Belmont Fire Protection District
BMC	Belmont Municipal Code
BMP	best management practices
BPD	Belmont Police Department
BRSSD	Belmont-Redwood Shores School District
BTU	British thermal units
BVPDA	Belmont Village Priority Development Area
BVSP	Belmont Village Specific Plan
CAA	Federal Clean Air Act
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards Code
CalOES	California Office of Emergency Services
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAG	City/County Association of Governments
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CMU	Corridor Mixed Use

City of Belmont
Housing Element Update

CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CNU	Crisis Negotiation Unit
CPUC	California Public Utilities Commission
CRPR	California Rare Plant Rank
CWA	Federal Clean Water Act
dB	Decibel
dBA	A-weighted decibel
DBH	diameter at breast height
DOF	Department of Finance
DPM	diesel particulate matter
DU	dwelling unit
DWR	California Department of Water Resources
ECA	Essential Connectivity Areas
EIA	Energy Information Administration
EIR	Environmental Impact Report
ESA	federal Endangered Species Act
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FMP	Fisheries Management Plans
FRA	Federal Responsibility Area
FTA	Federal Transit Administration
HCD	California Department of Housing and Community Development
HCP	Habitat Conservation Plan
HIA	Harbor Industrial Area
HUD	Federal Department of Housing and Urban Development
HVAC	Heating, Ventilation and Air Conditioning
ICS	Incident Command System

in/sec	Inches per second
IOU	Investor-Owned Utilities
IPaC	Information for Planning and Conservation
IPCC	Intergovernmental Panel on Climate Change
ISO	Insurance Service Office
JPA	Joint Powers Authority
L _{dn}	Day-Night Average Level
L _{eq}	Equivalent Noise Level
LAFCO	Local Agency Formation Commission
LHMP	Local Hazard Mitigation Plan
LRA	Local Responsibility Area
MCL	Maximum Contaminant Level
MMT	million metric ton
MPWD	Mid-Peninsula Water District
MTC	Metropolitan Transportation Commission
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
NFIP	National Flood Insurance Program
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NWI	National Wetlands Inventory
NWIC	Northwest Information Center
OEHHA	Office of Environmental Health Hazard Assessment
OES	San Mateo County Office of Emergency Services
OPR	California Governor's Office of Planning and Research
PCE	Peninsula Clean Energy
PDA	Priority Development Area
PDF	project design features
PG&E	Pacific Gas and Electric Company
PPM	parts per million

City of Belmont
Housing Element Update

PPV	Peak Particle Velocity
PRC	Public Resources Code
PV	photovoltaic
RTP	Regional Transportation Plan
RHNA	Regional Housing Needs Allocation
RMS	Root Mean Square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SCS	Sustainable Communities Strategy
SFIA	San Francisco International Airport
SMCL	San Mateo County Library
SMCFD	San Mateo Consolidated Fire Department
SEMS	Standardized Emergency Management System
SFBAAB	San Francisco Bay Area Air Basin
SFRWQCB	San Francisco Bay Regional Water Quality Control Board
SHMP	State of California Multi-Hazard Mitigation Plan
SLF	Sacred Lands File
SMCCFD	San Mateo County Consolidated Fire District
SRA	State Responsibility Area
SUHSD	Sequoia Union High School District
SWAT	Special Weapons and Tactics
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TCM	Transportation Control Measures
TCR	Tribal Cultural Resources
TMDL	Total Maximum Daily Load
USACE	United States Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service

USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMТ	vehicle miles traveled
VSC	Village Station Core
VT	vehicle trips
WDR	Waste Discharge Requirement
WOTUS	Waters of the United States
WQS	Water Quality Standards
WUI	Wildland-Urban Interface

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed City of Belmont Housing Element Update (project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

Lead Agency Contact Person

Jennifer Rose, Economic Development & Housing Manager
City of Belmont Finance Department
One Twin Pines Lane, Suite 320
Belmont, California 94002
Housing@belmont.gov

Project Description

This EIR has been prepared to examine the potential environmental effects of the project. The following is a summary of the full project description, which can be found in Section 2.0, *Project Description*.

The project would provide a framework for accommodating new housing at all levels of affordability that is within access to transit, Downtown jobs, services, and open spaces. New housing units may occur anywhere in the City where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-family residential and mixed use of adequate density to meet affordability targets.

Project Characteristics

The project would apply to the entire geographic area located within the boundaries of the City of Belmont, which encompasses 4.2 square miles. The project would involve an update to the Housing Element of the City's 2035 General Plan for the 2023-2031 planning period. The proposed project establishes programs, policies and actions to further the goal of meeting the existing and projected housing needs of all household income levels of the community; provides evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2031, as established by the Association of Bay Area Governments (ABAG); and identifies any rezone program needed to reach the required housing capacity.

The project includes 144 Draft Housing Opportunity Sites as listed in Appendix SITE. There are four contiguous Draft Housing Opportunity Sites outside of City limits but within the City's sphere of influence (Sites 80, 83, 136, and 137). These sites are located on the eastern portion of the City and are bordered by Old County Road, O'Neill Avenue, Harbor Boulevard, and Elmer Street. A proposal to annex those sites into City limits has been received by the San Mateo Local Agency Formation Commission (LAFCo) and annexation approval is expected before the project is adopted in January 2023.

Project Objectives

The project presents a comprehensive set of housing policies and actions for the years 2023-2031 and will encompass the entire City of Belmont. The project will be based on the City's latest RHNA estimates and will:

- Update the General Plan's Housing Element to comply with State-mandated housing requirements
- Provide a framework, including rezoning site as necessary, for accommodating approximately 1,785 new housing units, with a buffer of up to 1,515 new housing units to ensure ongoing compliance with No Net Loss provisions of State housing law, for a total of 3,300 units, at all levels of affordability within access to transit, Downtown jobs, services, and open spaces.
- Be consistent with the City's expectation for growth forecasts to exceed those in its 2035 General Plan and Belmont Village Specific Plan.
- Anticipate better zoning utilization effort targeted along the entire El Camino Real corridor by rezoning SC sites to CMU and amending General Plan land use designations to be consistent with zoning.
- Amend other elements of the City's General Plan as needed to maintain internal consistency between the elements.

Alternatives

As required by CEQA, this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives. Based on the alternatives analysis, Alternative 1 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Increased Density/Height

Alternative 1

The No Project Alternative assumes there is no change in zoning or General Plan land use designations for the parcels identified by the project. Current uses on the sites would continue under this alternative, with future full buildout of the Draft Housing Opportunity Sites limited by the existing zoning and General Plan designations. Buildout of the Draft Housing Opportunity Sites under existing zoning would allow for up to 2,216 total housing units, housing a population of 5,540 residents (refer to Table 1). This alternative would only accomplish two of the four objectives identified for the project. It would not accomplish the project objectives of planning a buffer of up to 1,415 new housing units to ensure ongoing compliance with the No Net Loss provisions of State housing law and it would not anticipate better zoning utilization along the El Camino Real corridor.

Alternative 2

This alternative analyzes the same number of Draft Housing Opportunity Sites as the proposed project, but selected sites along the El Camino Real corridor could be developed with retail located on the first floor and up to 9 floors of residential units on the floors above, rather than the maximum of six stories under the proposed project. The Draft Housing Opportunity Sites identified as sites for increased density/height under this alternative are listed in Section 6.0, *Alternatives*, and shown in Table 1.

Refer to Section 6.0, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1.0, *Introduction*.

Issues to be Resolved

There are no issues to be resolved at this time.

Issues Not Studied in Detail in the EIR

The following issue areas are determined to have less-than-significant impacts due to the unique conditions of the City of Belmont and thus will not be analyzed in detail. Fuller descriptions of these areas can be found in Section 1.0, *Introduction*.

- Agricultural and Forestry Resources
- Mineral Resources

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Note that projects would be subject to relevant mitigation measures from the 2035 General Plan EIR and applicable provisions of the BMC. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per *CEQA Guidelines* Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under *CEQA Guidelines* Section 15091.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. Scenic vistas are generally not available from public viewpoints through the draft housing opportunities sites. Impacts would be less than significant.	None required	Less than significant
Impact AES-2. Draft Housing Opportunity sites are not within or prominently visible from designated or eligible Scenic Highways. There would be no impact.	None required	No impact
Impact AES-3. Development facilitated by the project has the potential to change the visual character in the corridor along El Camino Real. Buildings up to 65 feet in height could form an undesirable transition if developed close to lower-rise residences. In urbanized areas, development facilitated by the project along El Camino Real and east of the railroad alignment would conflict with regulations that govern building height. Impacts would be less than significant.	None required	Less than significant
Impact AES-4. Development facilitated by the project would create new sources of light or glare that could adversely affect daytime or nighttime views in the area. Impacts would be less than significant.	None required	Less than significant
Air Quality		
Impact AQ-1. The project would support the primary goals of the 2017 Clean Air Plan, would implement applicable control measures from the 2017 Clean Air Plan, and would not disrupt or hinder implementation of 2017 Clean Air Plan control measures. The project's VMT increase would be less than the population increase. Impacts would be less than significant.	None required	Less than significant
Impact AQ-2. Construction facilitated by the project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances. Impacts would be potentially significant but mitigable.	<p>AQ-1 Basic Construction Mitigation Measures</p> <p>All development facilitated by the project shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM₁₀ and PM_{2.5}) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity when feasible. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
	<ol style="list-style-type: none"> 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. 8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. 	
	<p>AQ-2 Additional Construction Mitigation Measures</p> <p>In addition to implementation of Mitigation Measure AQ-1, for a project that meets the following conditions the City shall condition the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures:</p> <ol style="list-style-type: none"> 1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences 2. Would result in a change in allowable dwelling units of more than 40 units 3. Would require demolition or simultaneous occurrence of more than two construction phases 4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential) 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>5. Extensive material transport of more than 10,000 cubic yards</p> <p>In addition to implementation of Mitigation Measure AQ-1, for Draft Housing Opportunity Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project:</p> <ol style="list-style-type: none"> 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. 5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. 6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel. 8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1 percent. 9. Minimizing the idling time of diesel-powered construction equipment to 2 minutes. 10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_x reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model 	

Impact	Mitigation Measure (s)	Residual Impact
	<p>engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.</p> <p>11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).</p> <p>12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM.</p> <p>13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines.</p>	
<p>Impact AQ-3. Development facilitated by the project would not expose sensitive receptors to substantial pollutant concentrations from CO hotspots or TACs. However, development facilitated by the project would site new sensitive land uses near substantial pollutant generating land uses along El Camino Real and Near Highway 101. Impacts would be less than significant with mitigation.</p>	<p>AQ-3 Roadway Health Risk Assessment</p> <p>Prior to issuance of building permits for residential developments within 1,000 feet of State Route 82 (i.e., El Camino Real), a roadway health risk assessment (HRA) shall be prepared by a qualified air quality analyst. An HRA shall also be prepared for residential development on Site 27 since it is within 500 feet of Highway 101. The roadway HRAs shall demonstrate that roadway impacts are below the BAAQMD's single-source risk and hazard thresholds. If risks and hazards exceed the applicable BAAQMD thresholds, then feasible project design features such as high-efficiency filtration shall be incorporated into the project. Screening tools may be used to assess health risks in lieu of a roadway HRA if said tools are the most current published BAAQMD tools.</p>	Less than significant
<p>Impact AQ-4. Development facilitated by the project would not create objectionable odors that could affect a substantial number of people. Impacts would be less than significant.</p>	None required	Less than significant
Biological Resources		
<p>Impact BIO-1. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or vegetation removal; therefore, the project would not have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. There would be no impact.</p>	None required	No impact

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-2. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or location of development. Therefore, the project would not have a substantial adverse effect on riparian habitat or sensitive natural communities. There would be no impact.	None required	No impact
Impact BIO-3. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or location of development. Therefore, the project would not have a substantial adverse effect on jurisdictional state or federally protected wetlands. There would be no impact.	None required	No impact
Impact BIO-4. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or location of development. The project would not have an impact on wildlife movement.	None required	No impact
Impact BIO-5. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or location of development, and development facilitated by the project would be subject to the City's ordinances and requirements protecting biological resources, such as trees. Impacts would be less than significant.	None required	Less than significant
Impact BIO-6. There are no Habitat Conservation Plans or Natural Community Conservation Plans applicable to the Draft Housing Opportunity Sites. Therefore, development facilitated by the project would have no impact.	None required	No impact
Cultural Resources		
Impact CUL-1. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of potential demolition, allowed ground disturbance or location of development. Therefore, the project would not have a substantial adverse effect on significance of historical resources.	None required	Less than significant
Impact CUL-2. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or location of development. Therefore, the project would not have a substantial adverse effect on the significance of archaeological resources.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-3. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowed ground disturbance or location of development. Therefore, the project would not have a substantial adverse effect on human remains.	None required	Less than significant
Energy		
Impact E-1. Development facilitated by the project would not result in a significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.	None required	Less than significant
Impact E-2. Development facilitated by the project would not conflict with or obstruct an applicable renewable energy or energy efficiency plan. This impact would be less than significant.	None required	Less than significant
Geology and Soils		
Impact GEO-1. There are no Draft Housing Opportunity Sites located within an Alquist Priolo Earthquake fault zone, and Therefore development facilitated by the project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault. There would be no impact.	None required	No impact
Impact GEO-2. Development facilitated by the project could result in exposure of people or structures to a risk of loss, injury, or death from seismic events. Development facilitated by the project could be located on a geologic unit or soil that is unstable or could become unstable resulting in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. With compliance of applicable laws and regulations, this impact would be less than significant.	None required	Less than significant
Impact GEO-3. Development facilitated by the project would include ground disturbance such as excavation and grading that would result in loose or exposed soil. Disturbed soil could be eroded by wind or during a storm event, which would result in the loss of topsoil. Adherence to permit requirements and city regulations would ensure this impact would be less than significant.	None required	Less than significant
Impact GEO-4. Future seismic events could result in liquefaction and lateral spreading of soils within the city. Development in these areas could be subject to liquefaction hazards. Compliance with the CBC would reduce liquefaction hazards. Existing safety element	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
<p>policies would apply to development facilitated by the proposed project in hazard zones for liquefaction or lateral spreading of soils. Impacts would be less than significant.</p>		
<p>Impact GEO-5. Development Facilitated by the project would occur on urban sites that would be served by existing sanitation infrastructure. New development is not anticipated to include the use of septic systems. Therefore, impacts related to the use of septic tanks or alternative wastewater disposal systems would be less than significant.</p>	None required	Less than significant
<p>Impact GEO-6. The proposed project would not change the development potential on Draft Housing Opportunity sites in terms of allowed ground disturbance or location of development. Impacts to paleontological resources would be less than significant.</p>	None required	Less than significant
Greenhouse Gas Emissions		
<p>Impact GHG-1. GHG emissions from development facilitated by the project would not exceed the BAAQMD interpolated 2030 project-level or plan-level thresholds. This impact would be less than significant.</p>	None required	Less than significant
<p>Impact GHG-2. Development facilitated by the project would be consistent with the goals of the 2017 Scoping Plan, Plan Bay Area 2040, City General Plan, and City Climate Action Plan. This impact would be less than significant.</p>	None required	Less than significant
Hazards and Hazardous Materials		
<p>Impact HAZ-1. Development facilitated by the project may result in the release of potentially hazardous materials and may occur within 0.25 mile of a school. However, compliance with regional and federal regulations related to hazardous materials and compliance with the Safety Element policies would minimize the risk of releases and exposure to these materials. Impacts would be less than significant.</p>	None required	Less than significant
<p>Impact HAZ-2. Development facilitated by the project could result in development on sites contaminated with hazardous materials. However, compliance with applicable regulations relating to site remediation would minimize impacts from development on contaminated sites, resulting in a less than significant impact.</p>	None required	Less than significant
<p>Impact HAZ-3. Development facilitated by the project could result in a safety hazard or excessive noise from the San Carlos Airport for people residing in Draft Housing Opportunity Sites. However, compliance with General Plan goals and policies and San Carlos ALUCP goals</p>	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
and policies would minimize impacts from airport hazards and impacts would be less than significant.		
Impact Haz-4. Development facilitated by the project would not result in physical changes that could interfere with or impair emergency response or evacuation. Therefore, the project would not result in interference with these types of adopted plans. Impacts would be less than significant.	None required	Less than significant
Hydrology and Water Quality		
Impact HYD-1. Development facilitated by the project would not violate water quality standards or Waste Discharge Requirements, or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant.	None required	Less than significant
Impact HYD-2. Development facilitated by the project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of local groundwater basins. Impacts would be less than significant.	None required	Less than significant
Impact HYD-3. Development facilitated by the project may alter drainage patterns and increase runoff on individual Draft Housing Opportunity Sites but would not result in substantial erosion or siltation on or off site, increased flooding on or off site, or contribute increased runoff that would exceed the capacity of existing or planned stormwater systems or contribute substantial additional sources of polluted runoff. Impacts would be less than significant.	None required	Less than significant
Impact HYD-4. Development facilitated by the project could alter drainage patterns on or increase runoff from the Draft Housing Opportunity Sites. The Draft Housing Opportunity Sites within an area at risk from inundation by flood hazard would be required to comply with applicable General Plan and Belmont Village Specific Plan goals and policies to prevent impedance or redirection of flood flows or release of pollutants due to project inundation. The Draft Housing Opportunity Sites in areas at risk from post-wildfire flooding would be required to comply with applicable State, County, and City regulations and policies to reduce impacts from redirection of post-fire flows. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact HYD-5. Development facilitated by the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. There is no applicable sustainable groundwater management plans. Compliance with the basin plan would be a requirement of all development facilitated by the project. There would be no impact.	None required	No impact
Land Use and Planning		
Impact LU-1. Project implementation would not physically divide an established community. Impacts would be less than significant.	None required	Less than significant
Impact LU-2. The project would not result in a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, this impact would be less than significant.	None required	Less than significant
Noise		
Impact NOI-1. development facilitated by the project outside the Belmont Village PDA could involve construction with longer durations, substantial soil movement, or use of large, heavy-duty equipment near noise-sensitive land uses that would exceed the daytime noise limits and result in significant impacts even with implementation of mitigation. Therefore, impacts generated by temporary construction noise would be significant and unavoidable.	None required	Significant and unavoidable
Impact NOI-2. Development facilitated by the project would result in a substantial increase in ambient noise levels from off-site increases in traffic volumes. Permanent impacts to ambient noise levels would be significant and unavoidable.	None required	Significant and unavoidable
Impact NOI-3. Development facilitated by the project would be residential and not anticipated to involve operational activities that could result in substantial vibration or groundborne noise (such as use of heavy industrial equipment). If pile driving is performed during construction, vibration from this equipment may exceed applicable standards. This would be a potentially significant impact.	NOI-1 Vibration Control Plan For projects involving pile drivers, vibratory rollers, or similar high-vibration equipment, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to: <ul style="list-style-type: none"> ▪ Use of drilled piles or similar method (e.g., cast-in-place systems) rather than pile driving ▪ Use of resonance-free vibratory pile drivers ▪ Use of rubber-tired equipment rather than metal-tracked equipment 	Significant and unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	<ul style="list-style-type: none"> Avoiding the use of vibrating equipment when allowed by best engineering practices <p>The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions of all buildings within a 50-foot radius as well as at potentially affected extremely fragile buildings/historical resources and/or residential structures within the vicinity of the construction site. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting any existing cracks. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</p> <p>A Statement of Compliance signed by the applicant and owner is required to be submitted to the City Building Department at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated and this person's contact information shall be posted in a location near the project site that it is clearly visible to the nearby receptors most likely to be disturbed. The Director would manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.</p>	
<p>Impact NOI-4. There are no Potential Sites within the noise contours for an airstrip or airport as depicted on the airport land use plan, and no impacts would occur from exposing residents or workers to excessive aircraft noise levels.</p>	None required	No impact

Impact	Mitigation Measure (s)	Residual Impact
Population and Housing		
Impact POP-1. Development facilitated by the project could accommodate an additional 8,250 new residents and 3,300 new housing units in the City. This would exceed the 2035 General Plan projections as well as Plan Bay Area 2040 population and housing forecasts but would be consistent with the City's RHNA allocation. The project would include an update to the 2035 General Plan to be consistent with the RHNA allocation, and ABAG's next RTP/SCS would incorporate the project's updates. Growth resulting from the project would therefore be anticipated and would not result in unplanned population growth. Therefore, impacts would be less than significant.	None required	Less than significant
Impact POP-2. Development facilitated by the project would occur on vacant, underutilized or underdeveloped lots, and would not displace substantial numbers of existing people or housing. Impacts would be less than significant.	None required	Less than significant
Public Services and Recreation		
Impact PS-1. Development facilitated by the project would increase the population in the city, which would increase demand for fire protection services. However, this increase would not require additional and/or expanded fire protection facilities. Impacts would be less than significant.	None required	Less than significant
Impact PS-2. Development facilitated by the project would increase the population in the city, which would increase demand for police protection services, which may result in the need for new or expanded facilities. Conformance with General Plan policies and programs related to police protection would require the City to continue to provide funding and adequate staffing, facilities, equipment, and technology to meet existing and projected service demands and response times, which would reduce this impact. Furthermore, new or expanded facilities would be subject to environmental review under CEQA. Therefore, this impact would be less than significant.	None required	Less than significant
Impact PS-3. Development facilitated by the project would increase the population in the planning area, which could result in the need for additional and/or expanded school facilities. However, Government Code 65995 (b) would require funding for the provision or expansion of new school facilities to offset impacts from the project. Therefore, this impact would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact PS-4. Development facilitated by the project would increase the population in the city, which would increase demand for parks and recreation services. However, conformance with BMC and General Plan policies and programs related to open space would require usable open space in new developments and payment of Quimby park in-lieu fees and park impact fees to ensure ongoing parkland maintenance to prevent deterioration. Therefore, this impact would be less than significant.	None required	Less than significant
Impact PS-5. Development facilitated by the project would increase the population in the city, which would increase demand for the use of public facilities such as libraries, resulting in the need for additional open hours and staffing and possibly the expansion of the Belmont Library. However, conformance with General Plan policies related to libraries would require the City to continue to support improvements to the Belmont Library. Furthermore, any future plans to expand the Belmont Library would be subject to environmental review under CEQA. Therefore, this impact would be less than significant.	None required	Less than significant
Impact PS-6. Development facilitated by the project would increase the population in the city, which would increase demand for the use of existing parks and recreational facilities, and may require the construction or expansion of additional parks and open space. However, developers would be required to adhere to policies in the General Plan and BMC and pay parkland fees for new development. Fees would fund park improvements and maintenance and thus would avoid or adequately mitigate physical deterioration. Therefore, this impact would be less than significant	None required	Less than significant
Transportation		
Impact TRA-1. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant.	None required	Less than significant
Impact TRA-2. The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact TRA-3. The project would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). This impact would be less than significant.	None required	Less than significant
Impact TRA-4. The project would not have the potential to result in inadequate emergency access. This impact would be less than significant.	None required	Less than significant
Tribal Cultural Resources		
Impact TCR-1. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of potential demolition, allowed ground disturbance or location of development. Therefore, the project would not have a substantial adverse effect on the significance of a tribal cultural resource.	None required	Less than significant
Utilities and Service Systems		
Impact UTIL-1. Development facilitated by the project may require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities within the city. While new connections to existing utility service systems would be required, such connections would not result in disturbance beyond individual development sites and adjacent infrastructure corridors and would not result in significant environmental effects. Impacts would be less than significant.	None required	Less than significant
Impact UTIL-2. Development facilitated by the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. The project would not impair the attainment of solid waste reduction goals and would comply with federal, State, and local statutes and regulations related to solid waste. Impacts would be less than significant.	None required	Less than significant
Wildfire		
Impact WFR-1. The Draft Housing Opportunity Sites are located in or near an SRA or VHFHSZ. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of location of development. In addition, population growth under the proposed project would be included in emergency response and evacuation plans. therefore, the project would not substantially impair an adopted emergency response or	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
evacuation plan. Impacts would be less than significant.		
Impact WFR-2. The Draft Housing Opportunity Sites are near State Responsibility Areas and near High and Very High FHSZs. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of allowing development on sites with heightened wildfire risks. Development facilitated by the project would not increase the likelihood of project occupants and structures to be exposed to wildfire risk. Therefore, the project would not expose people or structures to significant risks resulting from wildfires such as exacerbated pollution concentrations, the uncontrolled spread of wildfires, flooding, or landslides. Impacts would be less than significant.	None required	Less than significant
Impact WFR-3. The Draft Housing Opportunity Sites are near State Responsibility Areas and near High and Very High FHSZs. The proposed project would not change the development potential on the Draft Housing Opportunity Sites in terms of location of development; therefore, the project would not require installation or maintenance of infrastructure that would exacerbate fire risk or result in temporary or ongoing impacts to the environment beyond that anticipated under current zoning. There would be no impact.	None required	No impact

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1 Introduction

This document is a Program Environmental Impact Report (EIR) that analyzes the City of Belmont's (City's) proposed Housing Element Update Project (hereafter also referred to as the "proposed project" or "project"). This section discusses (1) the purpose of this Program EIR; (2) the type of environmental document prepared and future streamlining opportunities; (3) the purpose and legal basis for preparing an EIR; (4) the public review and participation process; (5) the scope and content of the Program EIR; (6) the issue areas found not to be significant; (7) the lead, responsible, and trustee agencies pursuant to the California Environmental Quality Act (CEQA); and (8) an overview of the environmental review process required under CEQA. The proposed project is described in detail in Section 2, *Project Description*.

1.1 Statement of Purpose

This Program EIR has been prepared in compliance with the CEQA Statutes and Guidelines (see *CEQA Guidelines* Section 15121[a]). In general, the purpose of an EIR is to:

1. Analyze the environmental effects of the adoption and implementation of the project;
2. Inform decision-makers, responsible and trustee agencies and members of the public as to the range of the environmental impacts of the project;
3. Recommend a set of measures to mitigate significant adverse impacts; and
4. Analyze a range of reasonable alternatives to the proposed project.

As the lead agency for preparing this Program EIR, the City of Belmont will rely on the EIR analysis of environmental effects in its review and consideration of the proposed project prior to approval.

1.2 Environmental Impact Report Background

This document is a Program EIR. *CEQA Guidelines* Section 15168(a) states that:

A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As a programmatic document, this EIR presents a citywide assessment of the impacts of the proposed project. Analysis of site-specific impacts of individual projects is not required in a Program EIR, unless components of the program are known in sufficient detail. Many specific projects are not currently defined to the level that would allow for such an analysis. Individual specific environmental analysis of each project will be performed as necessary by the City prior to each project being considered for approval. This Program EIR serves as a first-tier CEQA environmental document supporting second-tier environmental documents, if required, for development facilitated by the project on the Draft Housing Opportunity Sites.

Project applicants implementing subsequent projects may undertake future environmental review depending on the results of the analysis in this Program EIR and requirements of the mitigation measures. If project applicants are required to prepare subsequent environmental documents, they may reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives and other relevant factors. If the City finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review and a consistency finding would be prepared. Where subsequent environmental review is required, such review would focus on significant effects specific to the project, or its site, that have not been considered in this Program EIR (*CEQA Guidelines* Section 15168).

CEQA Guidelines Section 15151 provides the following standards related to the adequacy of an EIR:

An Environmental Impact Report should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to decide which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure.

CEQA Guidelines Section 15146 further provides the following additional standards related to the adequacy of an EIR:

The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.

- (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.
- (b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption, or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

1.2.1 Streamlining Under Senate Bill 226

In 2011, the California legislature enacted Senate Bill (SB) 226 to establish additional streamlining benefits applicable to infill projects that are consistent with the requirements set forth in *CEQA Guidelines* Section 15183.3 (Public Resources Code [PRC] Sections 21094.5 [c], 21094.5.5).

Residential projects are eligible for this streamlining provided they meet the following requirements: (1) are located in an urban area on a site that has been previously developed or adjoins existing qualified urban uses on at least 75 percent of the site's perimeter; (2) satisfy the performance standards provided in *CEQA Guidelines* Appendix M; and, (3) are consistent with the general use designation, density, building intensity and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, with some exceptions.

For these projects, the project-level environmental review is only required to analyze effects on the environment that are specific to the project or to the project site and were not addressed as significant effects in a prior planning-level or programmatic EIR unless new information shows the effects will be more significant than described in the prior EIR (PRC Section 21094.5 [a][1]). Moreover, the project-level environmental review is not required to consider potentially significant environmental effects of the project that may be reduced to a less-than-significant level by applying uniformly applicable development policies or standards adopted by the city, county, or the lead agency (PRC Section 21094.5 [a][2]). The project-level environmental review is also not required to discuss (1) alternative locations, project densities, and building intensities, or (2) growth-inducing impacts.

The intent of this Program EIR is to enable development facilitated by the project to use *CEQA Guidelines* Section 15183.3 to streamline future CEQA compliance. Projects that are consistent with City regulations, including zoning, would require no additional CEQA review, but applicants would be responsible for implementing applicable mitigation measures. The recommended mitigation measures, once adopted by the City Council, will be implemented on a project-specific basis as part of the entitlement or building permit application process.

1.2.2 Other Tiering Opportunities

For other types of projects proposed to be carried out or approved by a lead agency within the City, the lead agency may use this Program EIR for the purposes of other allowed CEQA tiering (PRC Sections 21068.5, 21093-21094, *CEQA Guidelines* 15152, 15385). Tiering is the process by which general matters and environmental effects in an EIR prepared for a policy, plan, program, or ordinance are relied upon by a narrower second-tier or site-specific EIR (PRC Section 21068.5). Moreover, by tiering from this Program EIR (once certified by the City Council), a later tiered EIR would not be required to examine effects that (1) were mitigated or avoided in this EIR, (2) were examined at a sufficient level of detail in this Program EIR to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project (PRC Section 21094).

1.3 Purpose and Legal Authority

The proposed project requires the discretionary approval of the Belmont City Council; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with *CEQA Guidelines* Section 15121 (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

“...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

This Program EIR is to serve as an informational document for the public and City of Belmont decision makers. The process will include public hearings before the Planning Commission and City Council to consider certification of a Final Program EIR and approval of the proposed project.

1.4 Public Review and Participation Process

The City of Belmont distributed a Notice of Preparation (NOP) of the Program EIR for a 30-day agency and public review period commencing July 6, 2021 and closing August 5, 2021. In addition, the City held a virtual scoping meeting on July 21, 2021. The meeting, held at 6 p.m., was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members and providing an opportunity for interested parties to submit verbal comments on the scope of the environmental issues to be addressed in the EIR. Due to the COVID-19 pandemic, the virtual meeting was held through an online meeting platform and a call-in number. The City received letters from two agencies in response to the NOP during the public review period. The NOP and scoping comment letters received are presented in Appendix NOP of this Program EIR. Table 1-1 summarizes the content of the letters and where the issues raised are addressed in the Program EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Agency Comments		
California Department of Transportation (Caltrans)	The commenter states that a vehicle miles traveled (VMT) analysis may be required and lists the components the VMT analysis should include if the project does not meet the City's adopted VMT policy screening criteria. The commenter suggested inclusion of several mitigation strategies including a Transportation Demand Management (TDM) Program. If any Caltrans facilities are impacted by the project, the commenter stated that those impacted facilities must meet American Disabilities Act (ADA) Standards after project completion and maintain bicycle and pedestrian access during construction.	This topic is addressed in Section 4.14, <i>Transportation</i> .
Native American Heritage Commission	The commenter discusses requirements under CEQA for tribal consultation and summarizes requirements under AB 52 and SB 18, along with recommendations for conducting cultural resources assessments.	This topic is addressed in Section 4.15, <i>Tribal Cultural Resources</i> .

1.5 Scope and Content

As discussed in Section 1.4, a NOP was prepared and circulated (Appendix NOP), and responses received on the NOP were considered when setting the scope and content of the environmental information in the Program EIR. Sections 4.1 through 4.17 address the resource areas outlined in the bullet points below. Section 5, *Other CEQA Required Discussions*, covers topics including growth-inducing effects, irreversible environmental effects, and significant and unavoidable impacts.

Environmental topic areas addressed in this Program EIR include:

1. Aesthetics
2. Air Quality
3. Biological Resources
4. Cultural Resources
5. Energy
6. Geology and Soils

7. Greenhouse Gas Emissions
8. Hazards and Hazardous Materials
9. Hydrology and Water Quality
10. Land Use and Planning
11. Noise
12. Population and Housing
13. Public Services and Recreation
14. Transportation
15. Tribal Cultural Resources
16. Utilities and Service Systems
17. Wildfire

In preparing the Program EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list can be found in Section 7, *Reference and Preparers*.

The alternatives section of the EIR (Section 6) was prepared in accordance with *CEQA Guidelines* Section 15126.6 and focuses on alternatives capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the “environmentally superior” alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required “No Project” alternative and three alternative development scenarios for the project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. *CEQA Guidelines* Section 15151 provides the standard of adequacy on which this document is based. The *Guidelines* state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.6 Issues Found to be Less than Significant

The following issue areas are determined to have less-than-significant impacts due to the unique conditions of the City of Belmont and thus will not be analyzed in detail beyond the discussion included below.

1.6.1 Agriculture and Forestry Resources

Setting

The City of Belmont lacks agricultural lands or forest. Neither agriculture nor forestry lands are a General Plan designation, zoning classification or use in the City (City of Belmont 2017a; Belmont Zoning Ordinance Section 7B). According to the California Department of Conservation’s Farmland

Mapping and Monitoring program, the City of Belmont is classified as urban and built-up land (2014). Additionally, there is no Williamson Act contract land within the City (DOC 2017). The National Resource Conservation Service's Prime Soils map identified no prime soils existing in Belmont (2009). There are no Draft Housing Opportunity Sites on lands currently used for agriculture or forestry.

Impact Analysis

a. Methodology and Thresholds of Significance

Agricultural impacts were evaluated based upon review of DOC farmland classifications, regulatory requirements that apply to the various agricultural lands within the City, and the potential of future development to create an agricultural/urban interface. For analysis purposes, "important farmlands" include the following DOC classifications: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to agriculture and forestry resources are considered significant if implementation of the proposed project would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))
4. Result in the loss of forest land or conversion of forest land to non-forest use
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

b. Impact Analysis

Development facilitated by the proposed Housing Element update would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; conflict with existing zoning for agricultural use, or a Williamson Act contract; conflict with existing zoning for or cause rezoning of forest land or timberland; result in loss of forest land or conversion of forest land to non-forest use; or otherwise convert Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, there would be no impacts on agriculture and forestry resources. This issue area will not be discussed further in the EIR.

1.6.2 Mineral Resources

Setting

The City of Belmont does not have significant mineral resources or active mining sites currently existing within its boundaries. Development facilitated by the proposed Housing Element update would primarily occur on undeveloped and underdeveloped land currently designated as residential, commercial, or industrial areas, which are not compatible with, identified for, or used for mineral extraction in the City. In addition, mineral resources are not an environmental impact area analyzed

in the City's General Plan EIR (City of Belmont 2017b). There are no Draft Housing Opportunity Sites on lands currently used for mineral extraction.

Impact Analysis

a. Methodology and Thresholds of Significance

Impacts related to mineral resources were evaluated using information found in the City's General Plan EIR.

For purposes of this EIR, implementation of the proposed project may have a significant adverse impact if the Potential Sites near mineral extraction sites would do any of the following:

1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan

b. Impact Analysis

Development under the proposed Housing Element update would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state or result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan or other land use plan. Therefore, there would be no impacts on mineral resources. This issue area will not be discussed further in the EIR.

1.7 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Belmont is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed Housing Element Update complies with State law, but is not a responsible agency involved with CEQA. There are no responsible agencies for this project.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the Program EIR itself. As a programmatic document, implementation of the proposed project would not directly cause development in areas where trustee agencies mentioned in *CEQA Guidelines* Section 15386 have jurisdiction. However, potential future development projects facilitated by the Housing Element Update could be located lands under trustee agency jurisdiction, at which time subsequent environmental review would occur.

1.8 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

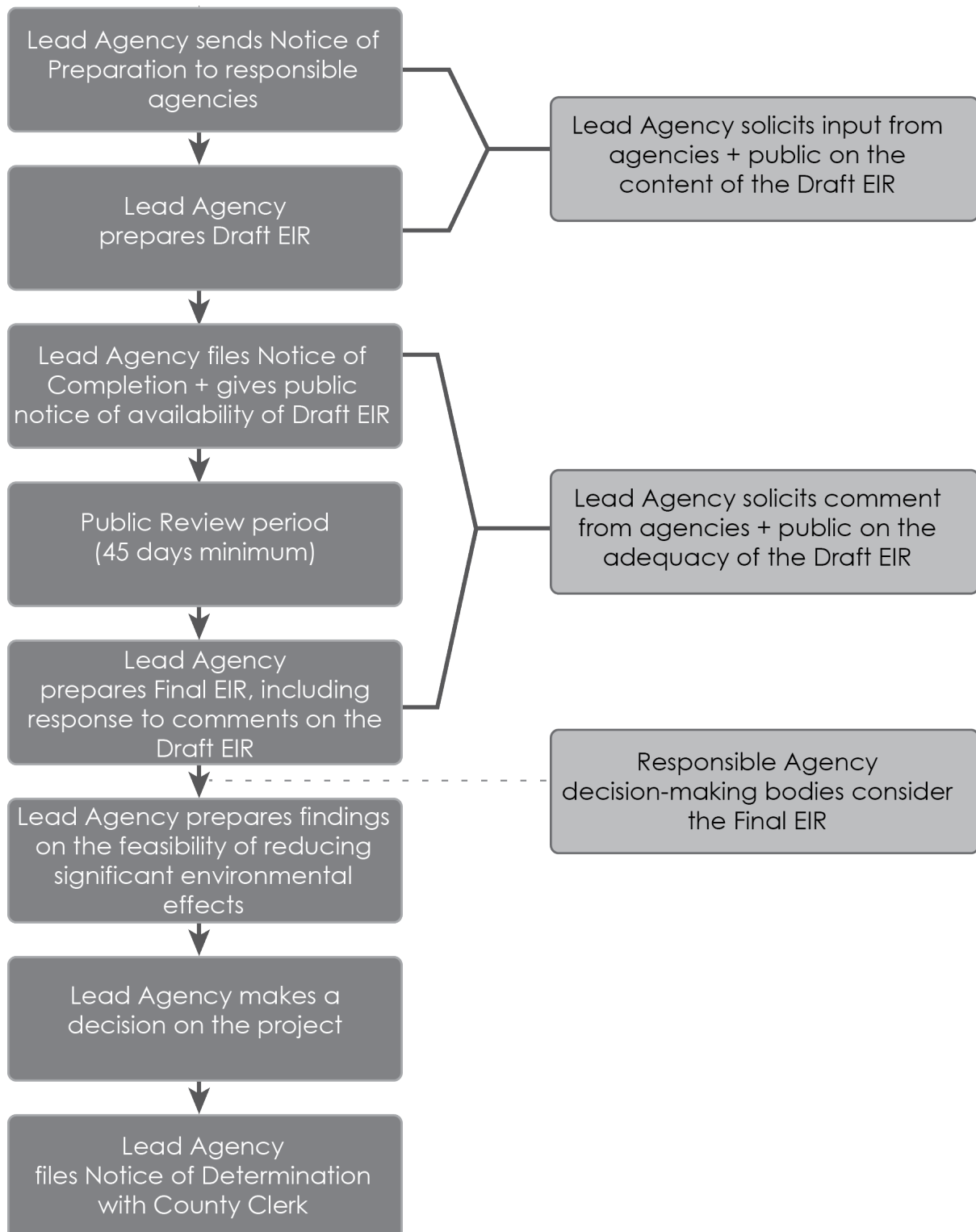
1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency (City of Belmont) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other

concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.

2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file

the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



2 Project Description

This section describes the proposed project, including the lead agency, the existing sites characteristics, the state mandatory requirements, project characteristics, project objectives, and discretionary actions needed for approval. This EIR analyzes all of the sites identified in the Housing Element; however, City Council has the authority to remove sites from the Housing Element based on public comment. The Housing Element also includes projects already in the development pipeline, which may have been analyzed separately for CEQA purposes.

2.1 Project Title

Belmont Housing Element Update Project

2.2 Lead Agency Name and Address

City of Belmont
One Twin Pines Lane
Belmont, California 94002

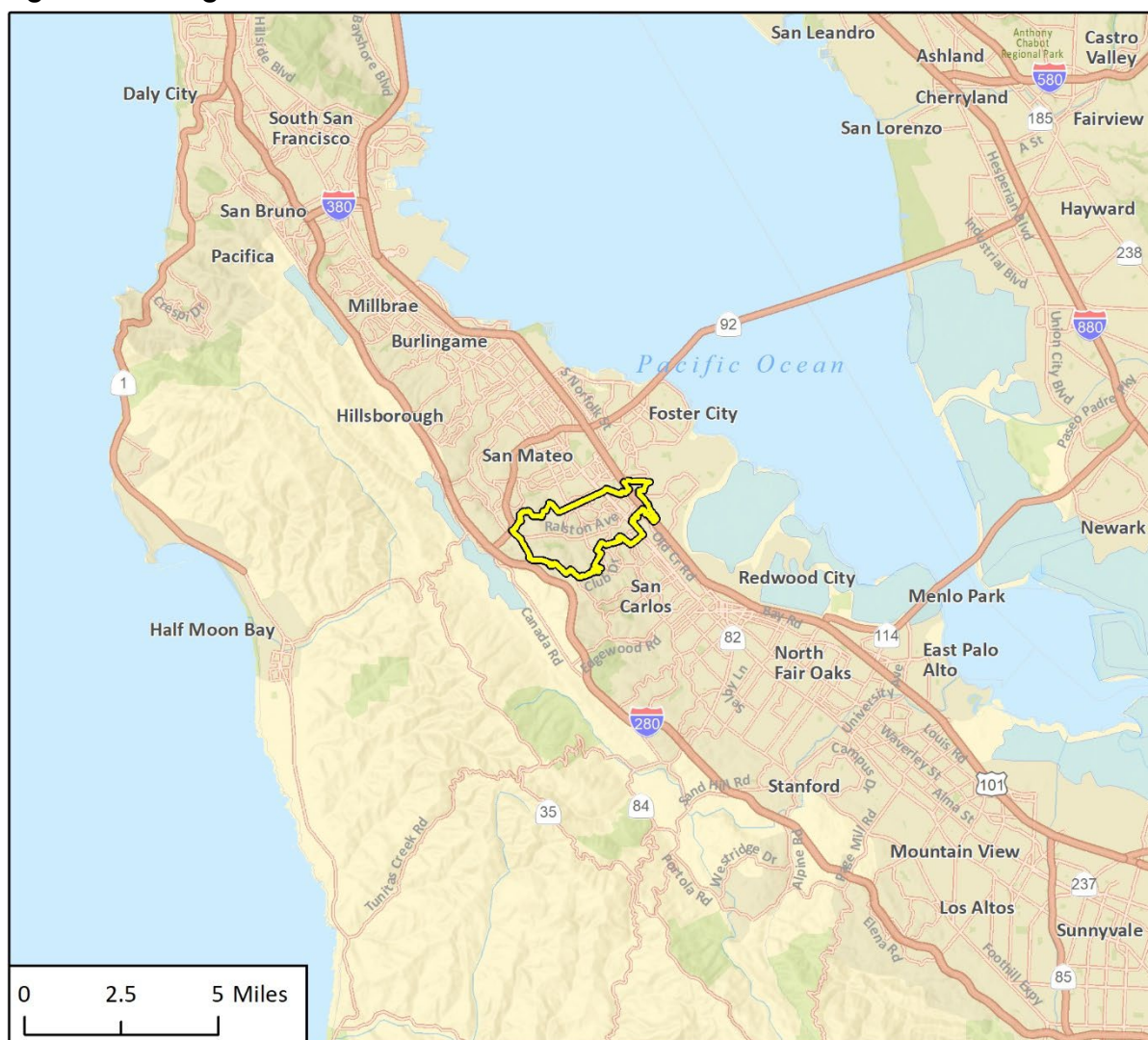
2.3 Lead Agency Contact Person

Jennifer Rose, Economic Development & Housing Manager
City of Belmont
Finance Department
One Twin Pines Lane
Belmont, California 94002

2.4 Project Location

The proposed project identifies 144 Draft Housing Opportunity Sites in the City of Belmont that are viable for new housing or rezone to accommodate new housing (Figure 2-1). The Draft Housing Opportunity Sites to be studied for housing opportunities are shown broadly in Figure 2-2 and Figure 2-3 and correspond to the list provided in Appendix SITE. Not all parcels have street addresses at this time. Sites in the eastern part of the City are regionally accessible from Highway 101; sites in the western part of the city are regionally accessible from US Interstate 280. Most of the Draft Housing Opportunity Sites are located within the El Camino Real/Old County Road corridors and Belmont Village Priority Development Area. With most of the City developed and preservation of open space a priority, all Draft Housing Opportunity Sites are on currently underdeveloped, underutilized, or vacant lots.

Figure 2-1 Regional Location



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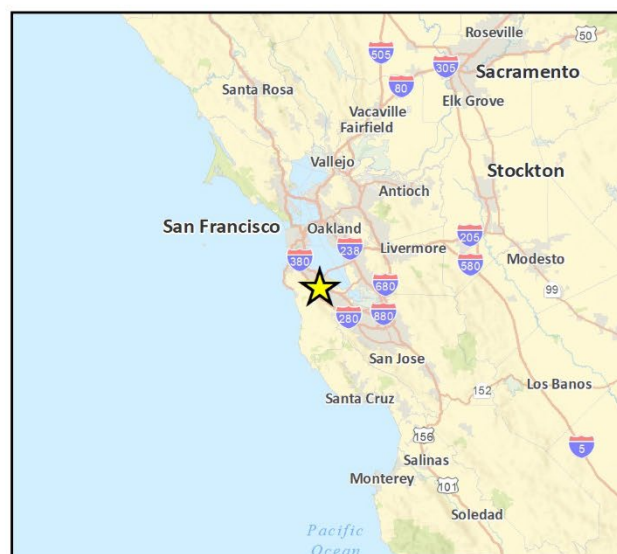
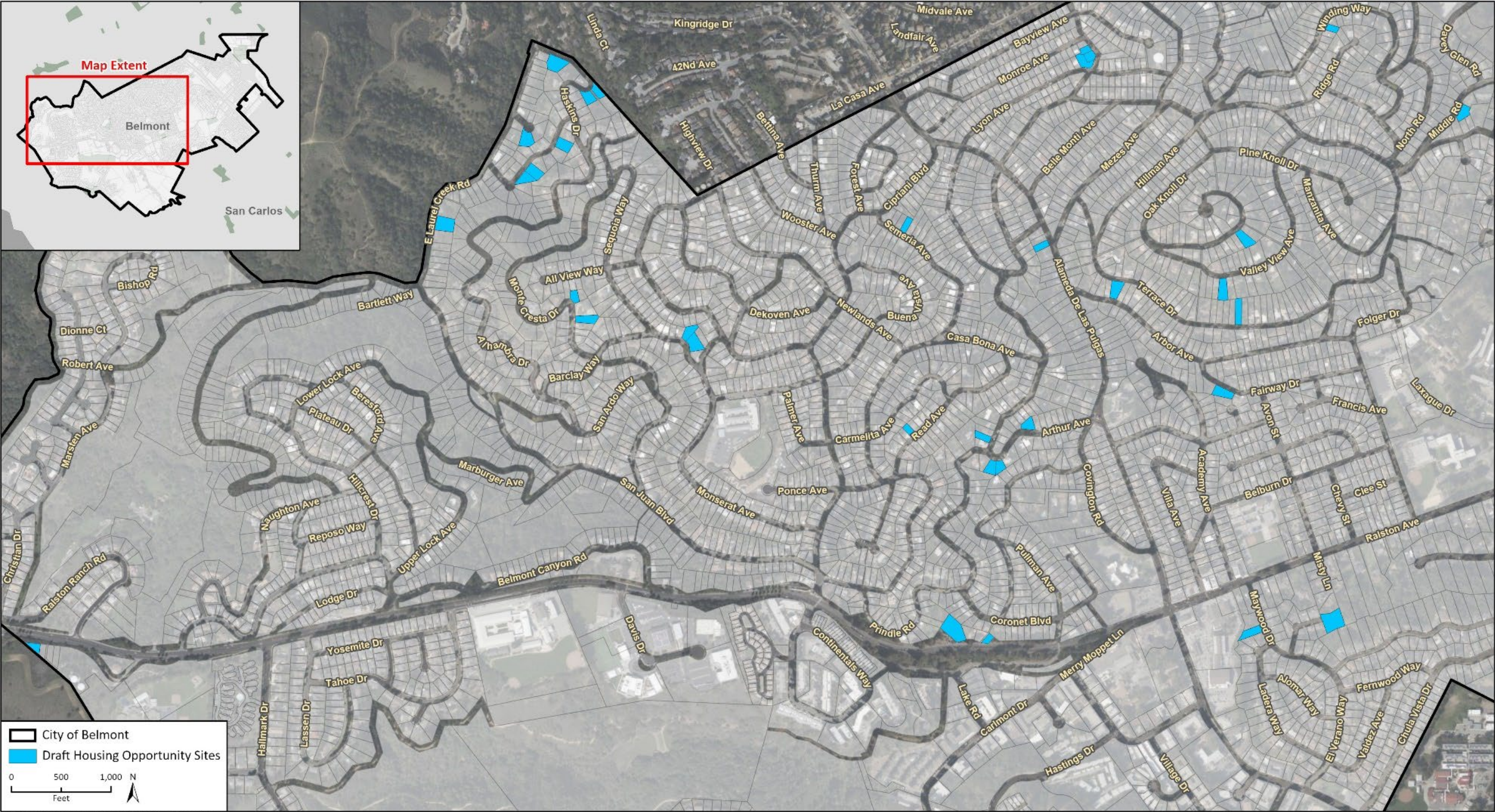
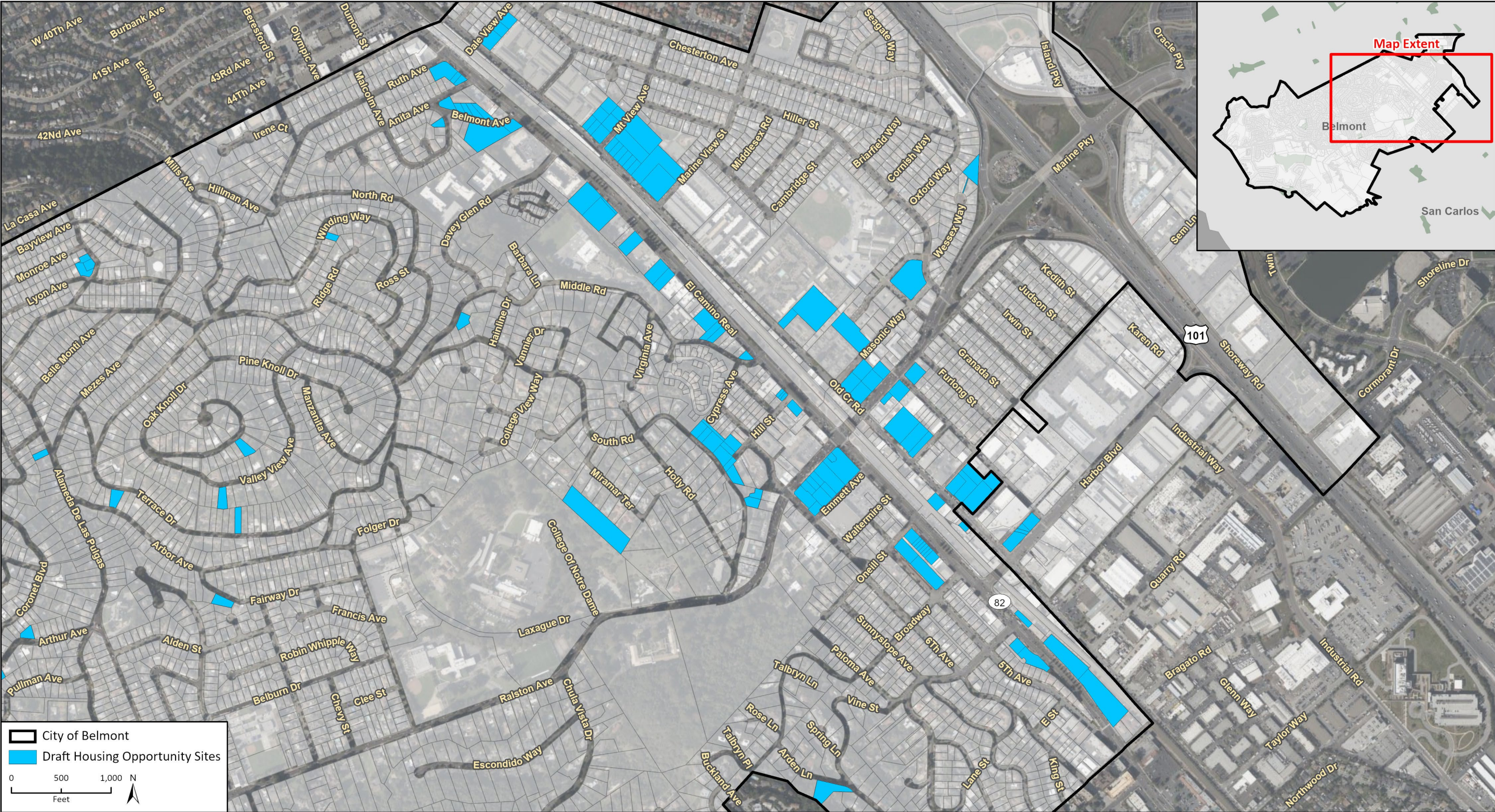


Figure 2-2 Potential Sites – West



Imagery provided by Esri, Microsoft Bing, and their licensors © 2021. 20-103777 Belmont, Google Maps Fig. X Housing Inventory Sites

Figure 2-3 Potential Sites – East



2.5 Existing Sites Characteristics

2.5.1 Current Land Use Designations and Zoning

The existing conditions and land use designations for the Draft Housing Opportunity Sites include residential, commercial, and industrial classifications. The sites include both undeveloped and underdeveloped parcels. Most of the Draft Housing Opportunity Sites tend to be clustered in the eastern half of the city, especially along El Camino Real. The sites located in these areas may be appropriate for different types of residential development, depending on their land use designation, parcel size, and other factors. In the central area, there are a number of smaller vacant sites. Refer to Appendix SITE for site-specific zoning and land use designations.

2.5.2 Surrounding Land Uses

Each Draft Housing Opportunity Site is surrounded by a different combination of land uses, but generally include single family residential, mixed use, multi-family residential, commercial, office, and vacant.

2.6 Project Characteristics

The project analyzed in the EIR would update the City's Housing Element, including goals, objectives, policies, and implementing program to further the goal of meeting the existing and projected housing needs of all household income levels of the community and would apply to the entire geographic area located within the boundaries of the City of Belmont, which encompasses 4.7 square miles. The project would involve an update to the Housing Element of the City's 2035 General Plan for the 2023-2031 planning period. The proposed project provides evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2031, as established by the Association of Bay Area Governments (ABAG); and identifies any rezone program needed to reach the required housing capacity.

The project includes 144 Draft Housing Opportunity Sites as listed in Appendix SITE. There are four contiguous Draft Housing Opportunity Sites outside of City limits but within the City's sphere of influence (sites 80, 83, 136, and 137). These sites are located on the eastern portion of the City and are bordered by Old County Road, O'Neill Avenue, Harbor Boulevard, and Elmer Street. See Figure 2-3 for more detail. A proposal to annex those sites into City limits has been received by the San Mateo Local Agency Formation Commission (LAFCo) and annexation approval is expected before the project is adopted in January 2023.

2.6.1 Housing Element Update

The Housing Element is comprised of the following major components:

- Review of effectiveness of existing Housing Element and its goals, policies, and programs
- Assessment of existing and projected housing needs
- Identification of resources – financial, land, administrative
- Evaluation of constraints to housing
- Affirmatively Furthering Fair Housing analysis
- Housing Plan – goals, policies, and programs

- Housing site inventory

The project would provide a framework for accommodating new housing at all levels of affordability that is within access to transit, Downtown jobs, services, and open spaces. New housing units may occur anywhere in the City where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-family residential and mixed use of adequate density to meet affordability targets.

2.6.2 RHNA Allocation

ABAG has allocated the region's 441,176 housing unit growth needs between each city and county in its region through a process called the RHNA. As shown in Table 2-1, Belmont's RHNA allocation for the 2023-2031 planning period (6th RHNA cycle) is 1,785 units, which is distributed among four income categories (HCD 2021). For the last RHNA cycle, the City was allocated a total of 468 units to be accommodated in its Housing Element inventory of adequate sites.

Table 2-1 RHNA Allocation and Percentage of Income Distribution for Belmont

Income Level	Percent of Area Median Income (AMI)	Units	Percent
Very Low	0-50%	488	27%
Low	51-80%	281	16%
Moderate	81-120%	283	16%
Above Moderate	>120%	733	41%
Total	—	1,785	100%

Source: ABAG 2021

The RHNA represents the minimum number of housing units that the City is required to plan for in its housing element by providing "adequate sites" through the 2035 General Plan and zoning.

2.6.3 Zoning and General Plan Amendments

The project would include a zoning ordinance amendment to rezone the Service Commercial (SC) sites to Corridor Mixed Use (CMU). The amendment would modify the maximum height to allow structures up to 65 feet in the CMU and Village Station Core (VSC) zones. The increased height would affect 20 SC, 22 CMU, and 5 VSC sites, for a total of 47 of the 144 Draft Housing Opportunity Sites as shown in Figure 2-4. In addition, the zoning code would be amended to increase the maximum allowable floor area ratio (FAR) to 2.5 and eliminate density maximum metric for the CMU zone as well.

The proposed height increase would affect parcels outside of the Draft Housing Opportunity Sites that are zoned CMU and VSC as shown in Figure 2-4. Future development of those sites would be required to undergo separate CEQA review and would conform to other development constraints such as maximum allowable FAR. For purposes of this EIR, impacts to aesthetics from the height increase outside of the Draft Housing Opportunity Sites are addressed in Section 4.1, *Aesthetics*.

Due to the proposed zoning modifications on particular Draft Housing Opportunity Sites, a General Plan Amendment would be required to change the land use designations on those sites to be consistent with the zoning.

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2.6.4 Project Buildout

Project implementation would encourage better utilization of up to 144 urban sites throughout the City of Belmont as listed in Appendix SITE. The project would add sites to the City's Housing Element opportunity sites to comply with new inventory requirements in Housing Element law. The project is intended to facilitate and encourage housing development that could be developed over an 8-year period commencing in 2023 and ending in 2031.

Appendix SITE shows the maximum potential project buildout of the Draft Housing Opportunity Sites for purposes of the environmental analysis. The table calculates the expected number of residential units for each site based on parcel size and calculates the estimated number of future residents based on the California Department of Finance's (DOF's) estimate of 2.5 residents per dwelling unit in the City of Belmont (DOF 2021). To provide a buffer for the Housing Element, this EIR analyzes a total project buildout of approximately 3,300 dwelling units and approximately 8,250 new residents by 2031. This buffer of 1,515 housing units above the required RHNA would ensure that the City can meet the required allocation even if some sites develop below the projected capacity, with uses other than housing, or at income levels different than the inventory anticipates, otherwise known as the "no net loss" provisions. Due to ongoing revisions in the Draft Housing Element as it been reviewed internally by the City and ongoing individual development proposals, the estimated maximum unit buildout in Belmont has been reduced to 2,984 dwelling units. To be conservative, this EIR analyzed maximum buildout of 3,300 dwelling units, which was proposed at the time of analysis. To meet the RHNA requirements the Housing Element would exceed 2035 General Plan population and housing units projections by 13.6 percent and 14.6 percent respectively, as discussed in Section 4.12, *Population and Housing*.

2.7 Project Objectives

The project presents a comprehensive set of housing policies and actions for the years 2023-2031 and will encompass the entire City of Belmont. The project will be based on the City's latest RHNA estimates and will:

- Update the General Plan's Housing Element to comply with State-mandated housing requirements
- Provide a framework, including rezoning site as necessary, for accommodating approximately 1,785 new housing units, with a buffer of up to 1,515 new housing units to ensure ongoing compliance with No Net Loss provisions of State housing law, for a total of 3,300 units, at all levels of affordability within access to transit, Downtown jobs, services, and open spaces.
- Be consistent with the City's expectation for growth forecasts to exceed those in its 2035 General Plan and Belmont Village Specific Plan.
- Anticipate better zoning utilization effort targeted along the entire El Camino Real corridor by rezoning SC sites to CMU and amending General Plan land use designations to be consistent with zoning.
- Amend other elements of the City's General Plan as needed to maintain internal consistency between the elements.

2.8 Required Approvals

The Belmont City Council approves the following components of the project prior to certification of the EIR:

- Amending the General Plan to update the Housing Element
- Adoption of an ordinance amending the zoning ordinance and zoning map to reflect the location and density of the land uses permitted by the Housing Element
- Amending the General Plan land use designations to reflect the zoning ordinance amendments

After adoption of the project, the City will submit it to the California Department of Housing and Community Development (HCD) for initial review and comments. Belmont City Council will integrate HCD comments and adopt the project. HCD will then certify the project. The deadline for the City to submit its adopted Housing Element to HCD is January 31, 2023. HCD has an additional 60 days to certify the project after it has been adopted by City Council.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The City of Belmont is located in San Mateo County on the San Francisco Peninsula, halfway between San Francisco and San Jose. It is regionally accessible via California State Route 92, California State Route 82 (El Camino Real), Interstate 280, and U.S. Highway 101. The City itself is approximately 4.7 square miles with bay marshlands and sloughs in the eastern portion of the City and hilly terrain in the western portion. Along the marshlands, the City sits at sea level and transitions to upwards of 800 feet above sea level moving towards the hills to the west. Residential uses are concentrated to the west of El Camino Real in the City's hillsides while commercial and industrial uses are clustered adjacent and to the east of El Camino Real (City of Belmont 2017).

The Mediterranean climate of the region and coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. Air quality in the Bay Area Air Quality Management District is in nonattainment for ozone, particulate matter equal to or less than 10 micrometers in diameter or less (PM₁₀), and particulate matter equal to or less than 2.5 micrometers in diameter or less (PM_{2.5}) (BAAQMD 2017).

The Draft Housing Opportunity Sites (sites) are located throughout the City of Belmont, with most sites located within the Belmont Village Specific Plan (BVSP) area along El Camino Real corridor in the eastern portion of the City. Figures 2-2 and 2-3 in Section 2, *Project Description*, provide an overview of the Draft Housing Opportunity Site locations.

Draft Housing Opportunity Sites in the eastern part of the City are regionally accessible from Highway 101; Draft Housing Opportunity Sites in the western part of the City are regionally accessible from US Interstate 280 (I-280).

3.2 Draft Housing Opportunity Sites Setting

As shown in Figures 2-2 through 2-3 in Section 2, *Project Description*, the Draft Housing Opportunity Sites are located throughout the City, including in the Belmont Village Specific Plan Area and on hillside residential lots. These sites are designated for single family residential, commercial, and industrial use, and are surrounded by single family and multifamily residential development, commercial development, office, public space, educational facilities, industrial, and vacant uses. The Draft Housing Opportunity Sites include both undeveloped, underdeveloped and developed parcels.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, the California Environmental Quality Act (CEQA) requires Environmental Impact Reports (EIRs) to consider potential cumulative impacts of the proposed project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts.

Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA Guidelines Section 15130 requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a summary of projections contained in an adopted planning document such as a general plan.

The project would be consistent with the following key strategies outlined in the 2035 General Plan:

- **Preserve Existing Neighborhoods and High Quality of Life.**

The General Plan supports a wide variety of housing types to provide opportunities for people of all ages and incomes to live in Belmont. The proposed project would be consistent with this General Policy key strategy as it would provide a framework to accommodate new housing units at all levels of affordability within access to transit, Downtown jobs, services, and open space.

- **Create a Vibrant Downtown Village.**

The General Plan establishes goals for a true town center that is supported by the City's implementation of the Belmont Village Specific Plan, which provides detailed land use strategies and transportation improvements to revitalize the City's downtown. The proposed project would be consistent as it would encourage residential development within the City's downtown and compliment the Belmont Village Specific Plan's goals of revitalizing the downtown area by encouraging the development of attractive, transit-oriented residences along the El Camino/Old County Road corridors.

- **Focus Economic Growth in Key Areas.**

The General Plan emphasizes redevelopment and infill communities in key focus areas for economic growth such as Belmont Village and the El Camino Real corridors. The proposed project would be consistent as it would encourage redevelopment which would be concentrated along the El Camino Real corridor and Belmont Village as shown in Figure 2-2 and Figure 2-3 in Section 2, *Project Description*.

- **Enhance Connectivity.**

The General Plan focuses on enhancing connectivity by improving key corridors and enhancing multimodal mobility. The proposed project would be consistent with this key strategy as it would encourage the concentration of development along the El Camino Real corridor in close proximity to Belmont's Caltrain station, which would enable potential occupants of the project to use alternative transportation options.

- **Continue Commitment to Parks, Recreation, and Open Space.**

The General Plan identifies priorities to protect open space while allowing limited development to be clustered and designed to fit into the City's natural setting where allowed and feasible. The project would be consistent as it proposes clustered development on undeveloped and underdeveloped parcels, with most of the Draft Housing Opportunity Sites clustered in the eastern half of the City, especially along El Camino Real. The project development pattern would satisfy the demand for housing according to the City's RHNA allocation while also encouraging clustered development to ensure that housing would not encroach on the City's open space.

According to *CEQA Guidelines* Section 15130(d), no further cumulative impact analysis is required when a project is consistent with a general plan where the lead agency determines that the regional cumulative impacts of the proposed project have already been adequately addressed in a certified EIR for that plan, in this case the City's 2035 General Plan.

In addition, buildout of local and regional general plans, including the City of Belmont's 2035 General Plan, could result in up to 1,500 total new households throughout the City (City of Belmont 2017). Buildout of adopted specific plans, including the Belmont Village Specific Plan, are considered cumulative projects for the purpose of this analysis. These projects are considered in the cumulative analyses in Section 4, *Environmental Impact Analysis*.

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Belmont Housing Element Update Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. As defined by the *CEQA Guidelines* Section 15382A, a “significant effect”

...means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per CEQA Guidelines Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under CEQA Guidelines Section 15091.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this EIR summarizes the impacts and mitigation measures that apply to the proposed project.

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4.1 Aesthetics

This section evaluates the potential impacts on aesthetics, including scenic vistas, scenic resources, visual character and quality, and light and glare, associated with the implementation of the proposed project.

4.1.1 Setting

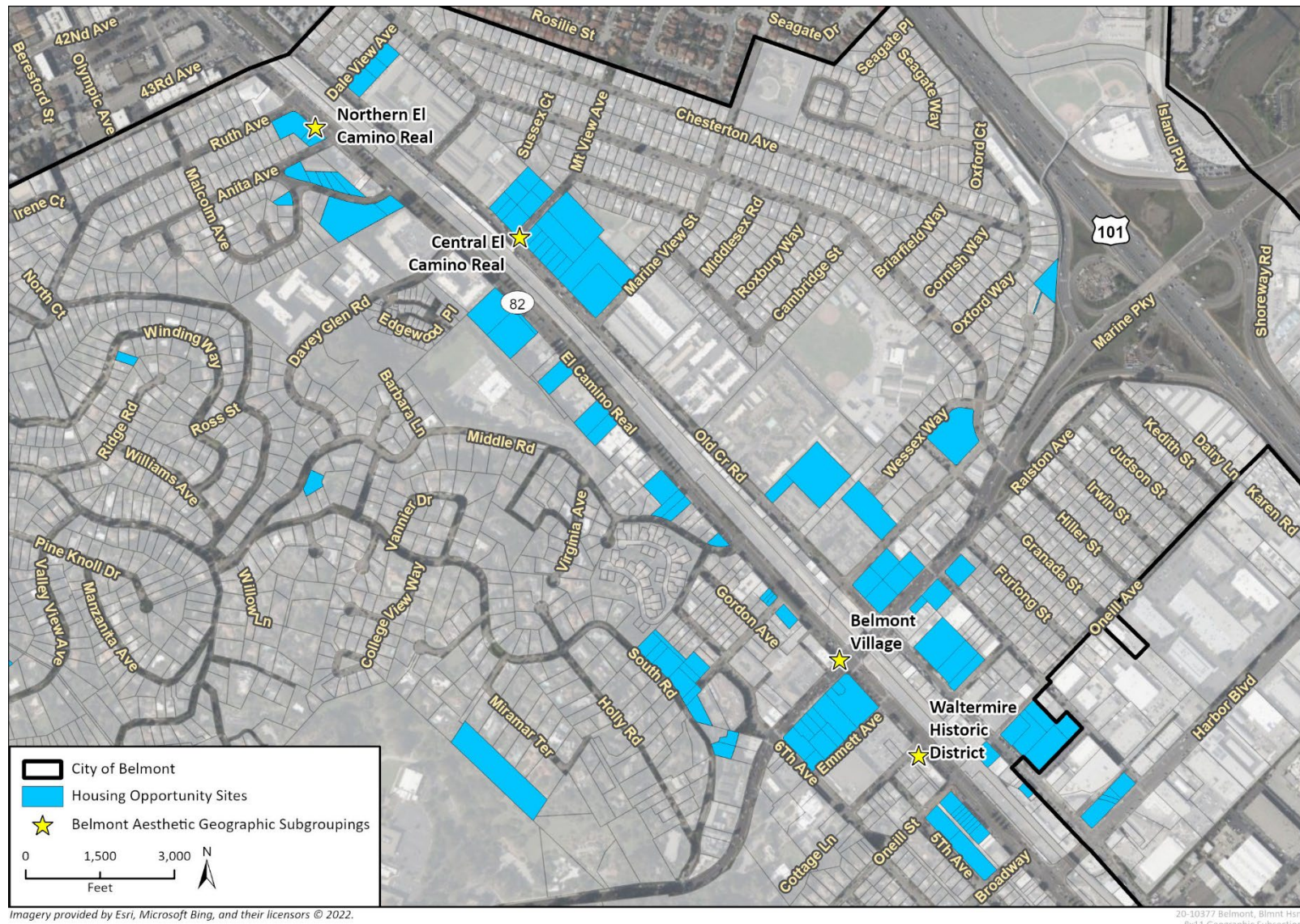
Belmont is situated on the San Francisco Peninsula, about halfway between San Francisco and San Jose. The landscape is characterized by marshlands and sloughs at sea level in the eastern part of the city, which connect to San Francisco Bay, and hilly terrain in the western part of the city that rises upwards of 800 feet. Development began in the late nineteenth century and has grown modestly since then to a suburban-style community of 26,470 persons as noted in Section 4.12, *Population and Housing*. Highway 101 on the eastern edge of the city parallels El Camino Real, a main arterial road that runs north and south.

Visual Characterization of Select Areas Within the City

As described in Section 2, *Project Description*, the zoning from 55 feet for some of the Draft Housing Opportunity Sites would be amended to allow for a maximum height of 65 feet. This would apply to the Corridor Mixed Use (CMU) and Village Station Core (VSC) zones. These are depicted in Figure 2-4, in green. The Draft Housing Opportunity Sites occur mainly along El Camino Real on both the north and south sides. This corresponds with the State Route 82 corridor that is situated within the Grand Boulevard Initiative planning area.

The following discussion characterizes the existing visual conditions in the geographic areas where Draft Housing Opportunity Sites have been identified. Figure 4.1-1 identifies the five general geographic areas along El Camino Real that have been characterized below.

Figure 4.1-1 Geographic Sub-areas Along El Camino Real



Northern El Camino Real

At the northern end of El Camino Real, commercial and light industrial, single-story development line the roadway with building fronts separated from the street by sidewalks where Draft Housing Opportunity Site Numbers 1 through 4, 6, and 8 occur on each side of El Camino Real and Site Numbers 12, 85, 86, 91 through 93, and 144 occur along El Camino Real and Belmont Avenue. Some buildings have limited landscaping. The electrical transmission lines are above ground and wires are a dominant visual element as shown in Figure 4.1-2. Block retaining walls separate empty lots or parking lots from the train tracks on the northeast side of the boulevard.

Figure 4.1-2 View of Development along El Camino Real at the Northern City Limit Looking Northeast



Source: Rincon Consultants 2021

Although long-range views along El Camino Real are available to drivers, they do not offer clear views of landscape elements such as mountains or San Francisco Bay, nor do they feature unified or cohesive architectural and landscape design.

Central El Camino Real near Mountain View Avenue

Similarly, Draft Housing Opportunity Sites further south along El Camino Real, near Davey Glen Road are near or adjacent to parcels currently developed with newer four-story condominiums with commercial and office development on the northwest side of the street (Figure 4.1-3) and single-story light industrial development on the northeast side of the train tracks (Figure 4.1-4). The development pictured in Figure 4.1-3 occurs close to the roadway and includes limited landscaping. The architecture is of contemporary design and includes natural colors and a variety of building

setbacks and exterior finishes that provide visual interest. The retaining walls next to the sidewalks are low with landscaping and street trees.

Figure 4.1-3 Four-Story Condos West of El Camino Real at Davey Glen Road



Source: Rincon Consultants 2021

Figure 4.1-4 Light Industrial Buildings East of El Camino Real and the Train Tracks



Source: Rincon Consultants 2021

To the southwest, views of the newer development begin to form a more unified urban-style corridor along El Camino Real, although adjacent parcels include single-story restaurant and commercial development are less so. Furthermore, street trees in southeast portion of this area are more numerous

On the northwest side of El Camino Real, beyond the railroad tracks, light industrial buildings are visible in the foreground, along with above-ground electrical transmission lines, overgrown ruderal

vegetation, and few street trees. Mature landscaped trees are visible in the middle ground. While this long-range view is panoramic and sweeping, the view is unremarkable as the transmission lines and antennae interfere in a unified and notable vista.

Downtown El Camino Real and Belmont Village

The Draft Housing Opportunity Sites (Numbers 40, 42, 55, 56, 59, 60, 121, 123, and 142), north of Emmett Avenue and west of El Camino Real are developed with one- and two-story retail centers that are part of the Belmont Village Specific Plan area. The shopping center features clusters of buildings with low peaked roofs above which air conditioning and ventilation equipment are visible from Ralston Avenue. The architecture creates a “village” style shopping center with interior storefronts designed to look like a traditional Main Street, which are visible from Ralston Avenue within the shopping center and from El Camino Real, looking west, where large windows face the corner and the street Figure 4.1-5 and Figure 4.1-6).

Figure 4.1-5 Shopping Center at Ralston Avenue and El Camino Real



Source: Rincon Consultants 2021

Figure 4.1-6 View of Storefronts along El Camino Real Looking Northwest



Source: Rincon Consultants 2021

This area of the Belmont Village has trees in a range of species, ages, and sizes. Raised medians with trees and river stones line the center of El Camino Real and the eastern stretch of Ralston Avenue. Benches and landscaped planters are present on a few streets, including the bus stops on El Camino Real and Ralston Avenue. Some properties feature high-quality landscaping and pedestrian amenities on their parcels, such as the new developments along El Camino Real in the commercial core.

Street lighting is variable across Belmont Village. Large highway light fixtures line El Camino Real and major intersections of Ralston Avenue. Pedestrian-scale light fixtures are included on some streets, including in the commercial core. Some sections of the streets lack lighting fixtures altogether.

From the corner of Ralston Avenue, looking east across El Camino Real, the railroad tracks and overpass dominate the foreground, with gas stations, restaurant, and other commercial uses beyond. As evident in Figure 4.1-7, industrial elements such as traffic signals, railroad components, and streetlights visually dominate the viewshed. The landscaping on the wall and around the traffic medians softens the concrete components and unifies them with the surrounding development.

Figure 4.1-7 View from Ralston Avenue and El Camino Real



Source: Rincon Consultants 2021

Waltermire Historic District

Waltermire Street is part of a historic district in the block between Emmett Avenue and O'Neill Avenue on the north/south sides and 5th and 6th Avenues on the east/west sides. A portion of Draft Housing Opportunity Site Number 61 is located within the boundaries of this historic district. Please refer to Section 4.4, *Cultural Resources*, for more information. The residences in this area were built in the early nineteenth century and retain their original visual character. Adjacent development includes the Safeway on 5th Avenue and Emmett Avenue to the north and a church to the south, on O'Neill Avenue. In this vicinity, the street trees are mature and well-maintained. The exterior walls of the Safeway store are clad in brick and wood and have a relatively dense covering of vines that reach the roofline and soften the uniformity of the long, windowless wall. This makes the newer,

commercial development compatible with the forms, colors, and landscaping of the historic residences. At O'Neill Street and El Camino Real (Draft Housing Opportunity Site Numbers 58, 61-64, and 70), and west of Civic Avenue/east of 5th Avenue (Numbers 66 and 71), the setting is like that described above, with a retail shopping center at the southwest side of El Camino Real and light industrial buildings on the northwest side. Between Civic Avenue and 5th Avenue, the parcels are vacant and have mature conifer trees, a parking lot, and some storage facilities and vehicles. West of 5th Avenue, one- and two-story residences are built along the entire block, with a church at the corner of 5th Avenue and O'Neill Avenue.

From the El Camino Real, looking east, development on the northwest side of the railroad tracks is not visible. Mature trees are, however, visible just north of the tracks as evident in Figure 4.1-8. Furthermore, the elevated alignment and existing trees block longer-range views toward the north/northeast from the street level and development beyond the railroad tracks is not visible to motorists or pedestrians on El Camino Real.

Figure 4.1-8 View of Elevated Railroad Alignment Northeast of El Camino Real



Source: Rincon Consultants 2021

Southern El Camino Real

At the southeastern extent of El Camino Real within Belmont, Draft Housing Opportunity Sites that would be zoned to accommodate the 65-foot maximum height are identified in an area characterized by single-story, retail businesses and restaurants with small parking lots between or in front of the structures. This includes Site Numbers 75 through 78 and 129. As with the nearby Opportunity Sites described above, single-story residences occur along 5th Avenue with their back yards adjacent to the existing stores and restaurants on El Camino Real (Figure 4.1-9).

To the northeast of El Camino Real and behind the businesses, the elevated railroad track separates the buildings from the one- and two-story light industrial buildings beyond. Southwest of El Camino Real and the restaurants and retail businesses, one-story, single-family residences occur along 5th Avenue, where the parcels rise slightly as the hillside gains elevation. Thus from 5th Avenue and 6th

Avenue, views are of the urban skyline and suburban development in the middle ground, along with the distant hills and ridgelines to the northeast (Figure 4.1-10).

Figure 4.1-9 Corner of Harbor Boulevard and 5th Avenue Looking East with Commercial Development Visible on the Downhill Slope at El Camino Real



Source: Rincon Consultants 2021

Figure 4.1-10 View Looking Northeast from 6th Avenue Across Draft Housing Opportunity Sites



Source: Rincon Consultants 2021

From public streets east of El Camino Real, for example Holly Road, South Road, and Miramar Terrace, views east toward El Camino Real are blocked by mature trees and other landscaping, retaining and privacy walls, and other development. However, the Draft Housing Opportunity Sites along South Road south of Cypress Avenue and Hill Street are adjacent to South Road. Vegetation that currently lines the roadway blocks views from South Road toward the east/northeast, in large part, but breaks in the vegetation afford sweeping views of San Francisco Bay, and the developed and natural landscape (Figure 4.1-11).

Figure 4.1-11 View Looking Northeast from South Road Across Draft Housing Opportunity Sites



Source: Google Earth 2021

Infill Development in Western Portion of the City

A few Draft Housing Opportunity Sites are situated on infill parcels in the western parts of the city in the hills, as illustrated in Figure 2-4. These sites are mainly in single-family residential neighborhoods with some existing small-scale condominium units. These neighborhoods feature larger residences with mature landscaping and consistent design. From many of these hillside streets, views toward San Francisco Bay and the other hillside neighborhoods are visible through the landscape trees within neighborhoods, but expansive views are limited as shown in Figure 4.1-12 and Figure 4.1-13.

Figure 4.1-12 Example Hillside Neighborhood View from North Road looking East



Source: Rincon Consultants 2021

Figure 4.1-13 Example Hillside Neighborhood View from Harbor Boulevard



Source: Rincon Consultants 2021

As an urbanized city, Belmont has higher light levels associated with development and transportation. Light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lot and building security lighting; moving sources of light

include the headlights of vehicles driving on roadways near the project site. Streetlights and other security lighting also serve as sources of light in the evening hours.

Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces are associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars.

Surface parking lots exist throughout the city, associated with commercial centers, schools, churches, and other institutions. Some of these have trees growing within the perimeter of the parking lot but others are open to the sun. Cars parked in these lots are more likely to produce glare throughout the day.

4.1.2 Regulatory Setting

a. State Regulations

California Scenic Highway Program

The California Department of Transportation manages the State Scenic Highway Program. The program was created in 1963 with the goal of protecting the aesthetic significance of scenic highways throughout the state. According to the State Streets and Highways Code (Sections 260 through 263), a highway may be designated as scenic based on its scenic quality, how much of the natural landscape can be seen by travelers, and the extent to which development intrudes on the traveler's enjoyment of the view. The California Scenic Highway Program's Scenic Highway System List identifies scenic highways that are either eligible for designation or have already been designated as such within San Mateo County, but none of these occur within Belmont or near the Draft Housing Opportunity Sites (California Department of Transportation [Caltrans] 2019). The routes are as listed in Table 4.1-1, with proximate distances from Belmont.

Table 4.1-1 State-designated Scenic Highways in San Mateo County

Route	Designation	Distance from Belmont* (miles)
Highway 1 from the Santa Cruz County line to south of the city limits of Half Moon Bay	Officially designated	17.8
Highway 1 from the Santa Cruz County line to the Santa Clara County line (designated)	Officially designated	25.8
State Route 35 from the Santa Cruz County line to the Santa Clara County line (designated)	Officially designated	19.3
State Route 35 from the Santa Clara County line to Half Moon Bay Road (designated)	Officially designated	10.7
Interstate 280 from the Santa Clara County line to north of the San Bruno city limits (designated)	Officially designated	0.25 - 1.0
SR 92 from Highway 1 near Half Moon Bay to Interstate 280 near Crystal Springs Lake	Eligible for designation	8.9

* Distance provided is from a central point on El Camino Real near the Caltrain Station

Source: Caltrans 2019

b. Local Regulations

City of Belmont General Plan Land Use Element

The Land Use Element describes the community and neighborhood character where single-family residences occupy much of the western part of the city, with industrial and commercial being along and east of El Camino Real. The Belmont Village Mixed Use land use designation is intended to promote a pedestrian-oriented, mixed-use core along much of El Camino Real, where many of the Belmont Housing Element Opportunity Sites are situated, especially the higher density sites. This area is subject to the Belmont Village Specific Plan, described below. Historic Resources in Belmont include the Waltermire Historic District, two city blocks bounded by El Camino Real, 6th Avenue, Waltermire Street, and O'Neill Avenue, which is adjacent to the Opportunity Sites southeast of O'Neill Street. According to the General Plan, the buildings were built between 1905 and 1936 and have a variety of architectural styles, including Queen Ann, Shingle, Colonial Revival, Bungalow, Spanish Eclectic, and English Cottage.

The General Plan includes goals and policies to support cohesive community design and enhance the visual quality of neighborhoods in the city.

Goal 2.4 Preserve the character and enhance the quality of Belmont's residential neighborhoods.

Policy 2.4-1: Promote neighborhood preservation and enhancement while also facilitating development of and improvements to dwelling units in the hillsides, where allowed in the Zoning Ordinance.

Action 2.4-1a: Update the single-family residential development regulations to establish a fair, objective, and predictable process. The update should address single family house size, house design and neighborhood compatibility, parking, second units, and the review process.

Policy 2.4-2: Maintain adequate and reasonable tree protection and removal standards and best management practices, implemented by the City's Tree Ordinance.

Policy 2.4-3: Promote neighborhood preservation and enhance residential areas east of El Camino Real, while also facilitating development of and improvements to dwelling units, where allowed in the Zoning Ordinance

Goal 2.5 Enhance the Belmont Village PDA and develop a distinct identity for the area as Belmont's vibrant town center for residents and visitors with commercial, residential, dining, civic, cultural, and entertainment activities.

Policy 2.5-3: Implement the Belmont Village Specific Plan as the guide for land use planning, design, streetscape, and public improvements in the Belmont Village PDA

Policy 2.5-4: Support the upgrade of existing establishments through façade and streetscape improvements, upgraded public and private landscaping, and aesthetically upgraded signage and wayfinding. Allow and promote outdoor dining, sidewalk cafes, and limited outdoor displays of merchandise to enliven street-level activity where appropriate.

Policy 2.5-7: Improve and enhance Belmont Village’s physical image and desirability as a place to invest, through public investments in infrastructure, parking, streetscapes, and public spaces.

Policy 2.6-6: Ensure that commercial development is designed to include:

- Integrated landscaping, parking (if required), signs, and site and building design.
- Common ingress and egress, safe and convenient access and internal circulation (depending on site size), adequate off-street parking and loading facilities (if required), and accessibility by multiple modes of transportation.
- Architecture that emphasizes establishing community identity while presenting tasteful, dignified, and visually appealing designs compatible with their surroundings.

Goal 2.13 Enhance Belmont’s character and image as a desirable community with distinct visual qualities, small-town character, and connections to nature and open space.

Policy 2.13-1: Ensure that new development is balanced with preservation of open space and natural features.

Action 2.13-1a: Establish development standards that will preserve natural features and characteristics, such as through clustering of development to preserve natural terrain and maximize open space areas around developments. Include development standards that balance protection of prominent vistas and ridgelines while allowing multi-family and single-family residential development projects, additions, and improvements to be completed, especially in the hillsides. These may also be addressed in updates to the San Juan Hills and Western Hills area plans. See Policy 2.14-1.

Policy 2.13-2: Promote compatibility of adjacent land uses along the interface of different residential density and non-residential intensity categories, such as where the Harbor Industrial Area borders Belmont Village and the Homeview neighborhood. Special attention should be given to buffering and transitional methods.

Policy 2.13-3: Ensure that the scale and character of new development is appropriate to the setting and intended use. Promote development that is scaled and sited to respect the natural terrain, so that hills, parks, open space, trees, and distant vistas, rather than buildings, dominate the overall landscape, while also developing the Belmont Village PDA and other focus areas for economic growth as concentrated, urban-scale nodes of activity.

Policy 2.13-4: Minimize light and glare from new development. See also Policy 5.3-6 in the Conservation Element.

Policy 2.13-5: In mixed-use, higher density residential, and commercial developments, require that building forms create coherent and consistent street frontages on blocks that emphasize the visibility of entrance doors, porches, stoops, and/or entrance patios.

Policy 2.13-6: Enhance walkability on a citywide scale by improving or adding sidewalks, landscaping, benches, wayfinding signage, public art, and pedestrian-scaled lighting, where appropriate and feasible.

Policy 2.13-7: Require energy and telecommunication devices (such as solar panels) that are added to the exteriors of buildings, or otherwise visible on a site, to be designed to minimize impacts on scenic views and vistas from the public realm to the maximum extent feasible without interfering with their function. See also policies under Goal 3.5 in the Circulation Element.

Policy 2.13-10: Promote the incorporation of public art in the design of the public realm to add visual richness and foster a sense of place.

Goal 2.19 Realize the community’s vision for the Belmont Village PDA as a vibrant, successful, engaging town center, with opportunities for residents to live, shop, work, and play.

Policy 2.19-1: Adopt and implement the Belmont Village Specific Plan as the guiding document for growth and development in this area. The Specific Plan should:

- Establish development and design standards for the Belmont Village PDA that provide specific and clear guidance to accommodate development that is compatible with the vision
- Maintain and enhance the visual quality and character of the area

Policy 2.19-5: Require pedestrian-oriented amenities, such as small plazas, outdoor seating, public art, and active street frontages, where appropriate and justified in the Village to create engaging pedestrian environments in the downtown.

Policy 3.4-5: Design new roads and improvements to existing roads to minimize visual and environmental impacts.

Policy 5.3-6: Avoid light pollution and unnecessary glare by requiring development projects to use design features and shielding methods that cast outdoor light downward and minimize glare and to install the minimum amount of outdoor lighting necessary for safety and security.

Action 5.3-6a: Update the Zoning Ordinance to include outdoor lighting standards consistent with best practices for safety and lighting to reduce high intensity outdoor lighting and glare.

Policy 5.3-7: Encourage the planting of native trees, shrubs, and grasslands to preserve the visual integrity of the landscape, provide habitat conditions suitable for native vegetation, and ensure the maximum number and variety of well-adapted plants are maintained.

City of Belmont Residential Design Guidelines

Belmont’s Design Review Process is “intended to preserve the natural beauty of Belmont and ensure that structures enhance their sites and are harmonious with their surrounding areas” (City of Belmont 2015). Section 13, Design Review, of Belmont’s Zoning Ordinance establishes site plan and architectural design review processes for multi-family, commercial and mixed use development. Design review according to Section 13 is required for projects that require Zoning Administrator, Planning Commission, or City Council approval. Section 13.3 dictates landscaping standards,

including requiring landscape features on a minimum of 10 percent of a gross site area, use of preferred tree and plant species, and screening of new surface parking lots. Section 13.6 lists objective design standards regarding building design, roof-top equipment, ground equipment screening, refuse containers, lighting design, and color of exterior materials. Belmont's Zoning Ordinance includes Section 13A – Single Family and Duplex Residential Design Review that applies to new dwellings, major additions, and some site renovations, and addresses preservation of public views.

Belmont Village Specific Plan

Chapter 4, *Urban Design*, of the Belmont Village Specific Plan contains urban design development standards for the four land use districts within the Belmont Village Planning Area (City of Belmont 2017b), including the Village Station Core and Corridor Mixed Use, where many of the Draft Housing Opportunity Sites are located. The design guidelines specify street frontage design that varied architectural styles, includes lighting and other elements into the storefront design, and a pedestrian scale, diverse built environment, and massing, exterior finishes, and decorative elements that attract pedestrian traffic. Streetscapes are similarly prescribed in terms of the arrangement and types of trees and other landscaping, the style of curbside parking and other amenities, and pedestrian-oriented lighting with a warmer temperature and lower wattage.

Belmont City Code

Belmont City Code Chapter 7, Article VII is in place to preserve, enhance, and perpetuate buildings, structures, and areas having special historical or aesthetic interest or value which contribute to community aesthetics and identity. The ordinance prescribes the procedure for altering, relocating, and demolishing structures so classified.

Belmont City Code Chapter 17 Article V details the requirement for the funding or installation of public art for all private residential development projects of five or more dwelling units. Belmont City Code Chapter 25 details requirements for tree protection including for tree pruning to maintain tree health and beauty. Permits are required

City of Belmont Zoning Ordinance

The Belmont Zoning Ordinance Section 5A, Corridor Mixed Use District, specifies building design standards (Section 5A.1.13) and site development standards (Section 5A.1.12, and landscape design standards (Section 5A.1.10). It also specifies that building heights not exceed 55 feet.

Section 13 of the City's Zoning Ordinance stipulates the requirements of design review, including site plan and architectural review for multi-family development of three or more units and landscape standards with plantings, public art, and public plazas and courtyards. The review procedure includes review by the Community Development Department, Zoning Administrator, and the planning commission to determine if the project design conforms to the goals and policies articulated in the General Plan and the Belmont Village Specific Plan, depending on project location.

4.1.3 Impact Analysis

The following section discusses the CEQA Guidelines Appendix G thresholds for aesthetics impacts and includes an evaluation of the setting described above relative to the thresholds listed below.

CEQA Significance Thresholds

The following thresholds of significance are based on CEQA Guidelines Appendix G. For purposes of this EIR, implementation of the proposed project may have a significant adverse impact if it would do any of the following:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
3. In non-urbanized areas, substantially degrade existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area

Threshold: Would the project have a substantial adverse effect on a scenic vista?
--

Impact AES-1 SCENIC VISTAS ARE GENERALLY NOT AVAILABLE FROM PUBLIC VIEWPOINTS THROUGH THE DRAFT HOUSING OPPORTUNITIES SITES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

For the purposes of this analysis, a scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered important by a jurisdiction or a community. It can be obtained from an elevated position (such as from the top of a hillside) or it can be seen from a roadway with a longer-range view of the landscape. An adverse effect would occur if a proposed project would block or otherwise damage a scenic vista upon implementation.

Belmont includes views from public streets in the hillside neighborhoods toward San Francisco Bay across the urbanized landscape of Belmont and cities beyond, to the east, as pictured in Figure 4.1-12, these views are not identified as scenic vistas except along Ralston Avenue, where long-range views occur in areas west of the El Camino Real corridor Draft Housing Opportunity Sites. Most of the development that would be facilitated by the project would occur along the extent of El Camino Real, including in the Belmont Village Planning Area and Specific Plan, where current zoning allows for buildings up to 55 feet in height. This area is highly urbanized; development facilitated by the project would largely be infill, some of which could be up to 65 feet in height, on parcels shown in Figure 2-4 in Section 2, *Project Description* where rezoning would occur. Most streets west of this area do not have public views across the El Camino Real corridor because of intervening development and mature trees on private properties and beside roadways (see Figure 4.1-13 for example views). In the limited areas where views are available from public roadways (Figure 4.1-11 and Figure 4.1-12), these include existing urban development and an increase in that development would not directly block those views.

The Draft Housing Opportunity Sites near and adjacent to Ralston Avenue occur in the lower elevation areas near El Camino Real and east of the railroad alignment. While some of the sites could include development that reaches the proposed 65-foot height limit, as indicated in Figure 2-4, these would not interfere with scenic vistas afforded from this boulevard on the western and more elevated portions of the roadway.

The Draft Housing Opportunity Sites in the hillside neighborhoods would not undergo zoning changes that would allow increased building mass or height and therefore there would be no impact to scenic views from public areas from development on those sites.

Finally, Section 13 of Belmont's Zoning Ordinance requires screening of undesirable views, like surface parking lots, new rooftop equipment, ground equipment (e.g. trash cans and electric meters), and blank walls. Requirements in Section 13A would address taller buildings that would result from the project, as Section 13A.5 includes standards for approval that buildings minimize disruptions of existing public views and to protect the profile of prominent ridgelines and balance the aesthetic impacts of hardscape as viewed from a public vantage point. As all taller potential development (i.e., up to 65 feet in height) would be situated on Draft Housing Opportunity Sites zoned for commercial and mixed-use development, they would also be subject to design requirements that dictate the architectural features as described in the Belmont Village Specific Plan (City of Belmont 2017), including roofline and building massing, that would be assessed on a project-by-project basis during design review to ensure the increased height does not affect scenic vistas. With adherence to goals and policies in the General Plan and the various City design requirements, which would be assessed during project plan review in accordance with the Belmont City Code, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
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Impact AES-2 DRAFT HOUSING OPPORTUNITY SITES ARE NOT WITHIN OR PROMINENTLY VISIBLE FROM DESIGNATED OR ELIGIBLE SCENIC HIGHWAYS. THERE WOULD BE NO IMPACT.

The closest designated State Scenic Highway to the city is Interstate 280, which is designated as such from SR 17 in Santa Clara County to SR 80 near First Street in San Francisco. This roadway lies to the west, about 0.28 to 1.0 mile, from the city boundary, on the other side of the ridge that roughly forms Belmont's western edge. It is roughly 1.25 miles east of the nearest Draft Housing Opportunity Site (Number 131), at which point the freeway alignment to the west is lower than the adjacent hilly topography east of the highway; neither Site Number 131 nor the city itself are visible from this Scenic Highway. No development would be facilitated, and no scenic resources would be damaged, by the project in or within clear view of this State-designated Scenic Highway. There would be no impact.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
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Impact AES-3 DEVELOPMENT FACILITATED BY THE PROJECT HAS THE POTENTIAL TO CHANGE THE VISUAL CHARACTER IN THE CORRIDOR ALONG EL CAMINO REAL. BUILDINGS UP TO 65 FEET IN HEIGHT COULD FORM AN UNDESIRABLE TRANSITION IF DEVELOPED CLOSE TO LOWER-RISE RESIDENCES. IN URBANIZED AREAS, DEVELOPMENT FACILITATED BY THE PROJECT ALONG EL CAMINO REAL AND EAST OF THE RAILROAD ALIGNMENT WOULD CONFLICT WITH REGULATIONS THAT GOVERN BUILDING HEIGHT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in Section 4.1.1 *Setting*, Belmont is largely built out with a mix of single-family residences in the western part of the city and commercial and light industrial along and east of El Camino Real. There are a few Draft Housing Opportunity Sites (for example, Numbers 74, 107, 110, 114) on vacant lots in the western hillside neighborhoods, where development activity would be subject to design review as part of the project approval process, including conformance with the Residential Design Standards. The project would also involve increased density along El Camino Real and east of the railroad alignment along both sides of Ralston Avenue. The project would include rezoning sites in the CMU and VSC zones as shown in Figure 2-4 in Section 2, *Project Description*, to allow buildings up to 65 feet in height. This would constitute a change from existing conditions, where most of the buildings along these roadways are one or two stories.

As stated in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. The project would encourage more housing units on sites designated for mixed use than under existing conditions. Most development facilitated by the project would be infill development intended to increase the visual quality of the affected areas, create a more unified visual experience, and fill in vacant and undesirable visual areas with attractive and economically vibrant new development. Investment in new urban infill typically improves visual quality by developing vacant, underutilized, or aging properties and improving maintenance of existing development. General Plan Policy 2.13-3 reduces the potential impact of new development that is inconsistent with established neighborhoods. New development with high-quality design can enhance the built environment with new architecture in character with or complementary to existing structures. Policy 2.5-4 supports upgrades to existing establishments through façade and streetscape improvements; Policy 2.5-7 requires the improvement of Belmont Village’s physical image; Policy 2.6-6 ensures that commercial uses have dignified and visually appealing designs; and Policy 3.4-5 in the Circulation Element ensures that new road improvements minimize visual impacts. The City also requires a 1 percent allocation of project funds for the implementation of public art on residential projects with five or more units. This could be part of the project design or the funds could go toward purchase of artworks for parks and other public spaces. Incorporating art into the public sphere increases a sense of place, adds to the cultural vibrancy, and can enhance the interconnectedness of residents and visitors to the city, thereby having a beneficial impact on aesthetic quality (American Planning Association 2018).

The Belmont Village Specific Plan discusses design standards for residential mixed-use development that includes varied massing and roofline configurations, diverse but cohesive architectural styles, and modulated building bulk that produces a pedestrian-friendly scaled design. These specific plan design requirements apply to the area for several blocks on all sides of the intersection of Ralston Avenue and El Camino Real. Commercial district design standards listed under Section 4.1.2,

Regulatory Setting, would apply to development facilitated by the project that would occur along the El Camino Real corridor in the areas zoned CMU.

Along the extent of El Camino Real building heights could be up to 65 feet and this could present a considerable contrast between the single-story and two-story residences on the nearby blocks west of El Camino Real. This could occur in areas near Site Numbers 85, 86, 91, 92, 93, and 144, for example, where the residential neighborhood west of Belmont Avenue and Malcom Avenue are mostly one-story, single-family residences or small apartment buildings that are built in line with the elevation of the hillsides. In these areas the transition between potentially five to six-story buildings and the single- or two-story residences to the west could be abrupt, imposing, and resulting in a visual impact. However, development facilitated by the project would be required to comply with Section 13A, which would address taller buildings that would result from the project. Also, Section 13A.5 includes standards for approval that buildings balance the aesthetic impacts of hardscape as viewed from a public vantage point.

In addition, the Draft Housing Element includes Policy H 1.6 which calls for the City to conduct a comprehensive audit of the zoning ordinance and adopt any changes needed to Objective Design Standards for multi-family residential projects and mixed-use projects with a residential component to comply with State law. This would be completed in 2023 to 2024.

With required adherence to goals and policies in the General Plan and the various City design requirements, which would be assessed during project plan review in accordance with the Belmont City Code, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD CREATE NEW SOURCES OF LIGHT OR GLARE THAT COULD ADVERSELY AFFECT DAYTIME OR NIGHTTIME VIEWS IN THE AREA. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Belmont is an urbanized city with commensurate light and glare. Development facilitated by the project would, in large part, occur as infill on already developed parcels along the extent of El Camino Real and along Ralston Avenue, east of the railroad alignment. New lighting could occur on buildings for safety and in pedestrian walkways, and light could be emitted from interior sources through windows on upper stories of tall (up to 65 feet) buildings. The main source of glare would likely be from the sun shining on the windows of parked cars associated with uses at the new development.

General Plan Policy 2.13-4 requires that light and glare is minimized; and Policy 5.3-6 requires developers to use design features to avoid light pollution and glare. In addition, several circumstances that mitigate the potential for new or substantial sources of light pollution in Belmont based on the location of new buildings. Belmont Zoning Ordinance Section 2.72.1 regulates

the installation of fully shielded outdoor light fixtures designed to prevent light spillage onto adjacent properties and to limit the brightness of those lights. This includes parking lot lights, streetlights, and safety fixtures installed on buildings.

Development facilitated by the project would mainly occur as redevelopment of existing built sites or infill development of unused parcels between existing built sites. When facilities such as parking lots are replaced with buildings, these replacements may reduce nighttime sources of light, because parking lots are often more brightly lit during the nighttime than most buildings. Development of underutilized or vacant parcels may result in new light sources, but they would likely be congruous with nearby light sources (e.g., lighting from residential windows). Furthermore, as the development facilitated by the project would be residential units, light from windows would be mostly filtered or obscured by window coverings.

Finally, as the infill development on the Draft Housing Opportunity Sites along El Camino Real and Ralston Avenue would occur along a major transit corridor, they would be designed to encourage alternative forms of transportation and surface parking lots would be limited or replaced with other forms of parking. Therefore, glare associated with parked cars would be reduced. Impacts related to increased light and glare under project implementation would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.1.4 Cumulative Impacts

Development facilitated by the project in conjunction with other nearby past, present and reasonably foreseeable future projects in the region could result in impacts to visual resources and aesthetic quality, although largely visual quality would improve with redevelopment of aging buildings and sparsely landscaped areas. Implementation of the project would encourage increased housing development citywide, mainly in areas already developed with other uses. Most projects in the city, adjacent cities, and San Mateo County would be required to undergo analysis for impacts to aesthetics and visual resources. These impacts would be mitigated by design guidelines, regulations, policies, and project-specific mitigation measures, thereby limiting damage to existing visual resources and enhancing the visual quality of areas where development occurs. Consequently, development facilitated by the project would not result in significant cumulative environmental impacts in conflict with requirements for preserving scenic vistas, scenic resources in State- or locally designated highways or drives, visual quality, and for limiting the effects of light and glare. Therefore, project implementation would not cause a cumulatively considerable impact on aesthetics and no further mitigation is required.

4.2 Air Quality

This section analyzes the potential air quality impacts associated with the implementation of the proposed project, including from conflicts with applicable air quality plans, exceedance of air quality standards from criteria pollutant emissions, exposure of sensitive receptors to substantial pollutant concentrations, and odor emissions. The analysis in this section is based in part on modeling using the California Emissions Estimator Model (CalEEMod); modeling outputs are included in Appendix AQ of this document.

4.2.1 Setting

a. Existing Air Quality Setting

Local Climate and Meteorology

The City of Belmont is located in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Air quality in these basins is affected by the region's emission sources and by natural factors. Topography, wind speed and direction, and air temperature gradient all influence air quality. The SFBAAB has a Mediterranean climate, with warm, dry summers and cool, damp winters.

Stationary and mobile sources generate air pollutant emissions in the basins. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and are generated by residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products, among other things. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

The SFBAAB typically has high concentrations of pollutants due to its high population density and because it includes the Bay Area's major metropolitan areas. Air pollution potential is highest along the southeastern portion of the peninsula, where Belmont is located, because that area is most protected from the winds and fog of the marine layer. Pollutants are also transported there from upwind sites.

Air Quality Standards

The federal and state governments have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the State equivalent in the California Environmental Protection Agency (CalEPA). The BAAQMD provides local management of air quality in the City. CARB has established air quality standards and is responsible for the control of mobile emission sources, while the BAAQMD is responsible for enforcing standards and regulating stationary sources.

The USEPA has set primary National Ambient Air Quality Standards (NAAQS) for ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM₁₀), fine particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}), and lead. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards (CAAQS) for these and other pollutants, some of which are more stringent than the federal standards. Table 4.2-1 lists the current federal and State standards for regulated pollutants.

Table 4.2-1 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8 Hour	0.070 ppm	N	0.070 ppm	N
	1 Hour	0.09 ppm	N		
Carbon Monoxide	8 Hour	9.0 ppm	A	9 ppm	A
	1 Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1 Hour	0.18 ppm	A	0.100 ppm	U
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	A
Sulfur Dioxide	24 Hour	0.04 ppm	A	0.14 ppm	A
	1 Hour	0.25 ppm	A	0.075 ppm	A
	Annual Arithmetic Mean			0.030 ppm	A
Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	N		
	24 Hour	50 µg/m ³	N	150 µg/m ³	U
Particulate Matter - Fine (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	N	12 µg/m ³	U/A
	24 Hour			35 µg/m ³	N
Sulfates	24 Hour	25 µg/m ³	A		
Lead	Calendar Quarter			1.5 µg/m ³	A
	Rolling 3 Month Average			0.15 µg/m ³	
	30 Day Average	1.5 µg/m ³			A
Hydrogen Sulfide	1 Hour	0.03 ppm	U		
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	No information available		
Visibility Reducing particles	8 Hour (10:00 to 18:00 PST)		U		

A=Attainment N=Nonattainment U=Unclassified; mg/m³=milligrams per cubic meter ppm=parts per million µg/m³=micrograms per cubic meter

Source: BAAQMD 2017a

As a local air quality management agency, the BAAQMD must monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet them. Depending on whether standards are met or exceeded, a local air basin is classified as in “attainment” or “non-attainment.” The SFBAAB is designated non-attainment for the federal standards for ozone and PM_{2.5} and in non-attainment for the State standard for ozone, PM_{2.5}, and PM₁₀.

Air Quality Pollutants of Primary Concern

The federal and State clean air acts mandate the control and reduction of certain air pollutants. Under these laws, USEPA and CARB have established ambient air quality standards for certain criteria pollutants. Ambient air pollutant concentrations are affected by the rates and distributions of corresponding air pollutant emissions, and by the climate and topographic influences discussed above. Proximity to major sources is the primary determinant of concentrations of non-reactive pollutants, such as CO and suspended particulate matter. Ambient CO levels usually follow the spatial and temporal distributions of vehicular traffic. A discussion of each primary criterion pollutant is provided below.

Ozone

Ozone is produced by a photochemical reaction (i.e., triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic gases (ROG).¹ NO_x is formed during the combustion of fuels, while ROG is formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

CO is an odorless, colorless gas and causes health problems such as fatigue, headache, confusion, and dizziness. The incomplete combustion of petroleum fuels by on-road vehicles and at power plants is a major cause of CO, which is also produced during the winter from wood stoves and fireplaces. CO tends to dissipate rapidly into the atmosphere; consequently, violations of the State CO standards are associated generally with major roadway intersections during peak-hour traffic conditions.

Localized CO “hotspots” can occur at intersections with heavy peak-hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high that the local CO concentration exceeds the NAAQS of 35.0 ppm or the CAAQS of 20.0 ppm.

Nitrogen Dioxide

NO₂ is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. Nitric oxide is the principal form of nitrogen oxide produced by combustion, but nitric oxide reacts rapidly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. Nitrogen dioxide is an acute irritant. A relationship between NO₂ and chronic pulmonary fibrosis may exist, and an increase in bronchitis may occur in young children at concentrations below 0.3 ppm. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM₁₀ and acid rain.

¹ CARB defines VOC and ROG similarly as, “any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2009). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.[1] CARB defines VOC and ROG similarly as, “any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions (CARB 2009). For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROG is used in this report.

Suspended Particulate Matter

PM₁₀ is particulate matter measuring no more than 10 microns in diameter; PM_{2.5} is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates, and sulfates. Both PM₁₀ and PM_{2.5} are by-products of fuel combustion and wind erosion of soil and unpaved roads and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates (those 2.5 microns and below) can be very different.

The small particulates generally come from windblown dust and dust kicked up by mobile sources. The fine particulates are generally associated with combustion processes, and form in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Lead

Lead is a metal found in the environment and in manufacturing products. Historically, the major sources of lead emissions have been mobile and industrial sources. In the early 1970s, the USEPA set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the USEPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Because of phasing out leaded gasoline, metal processing is now the primary source of lead emissions. The highest level of lead in the air is found generally near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers.

Toxic Air Contaminants

The California Health and Safety Code defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel particulate matter (DPM) from diesel-fueled engines. According to CARB, diesel engine emissions are believed to be responsible for about 70 percent of California's estimated known cancer risk attributable to TACs and they make up about 8 percent of outdoor PM_{2.5} (CARB 2021a).

Current Air Quality

CARB and the U.S. EPA established ambient air quality standards for major pollutants, including ozone, CO, NO₂, SO₂, Pb, and PM₁₀ and PM_{2.5}. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except for lead and the eight-hour average for CO. The local Air Pollution Control

Districts are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The City of Belmont is located within the SFBAAB under the jurisdiction of BAAQMD. As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The closest air quality monitoring station to the City is the Redwood City station at 897 Barron Avenue, located approximately 4 miles southeast of the closest Draft Housing Opportunity Site (Number 78). The Redwood City station monitors ozone, CO, NO₂, and PM_{2.5}. For PM₁₀ measurements, the San Francisco-Arkansas station at 10 Arkansas Street was used. This monitoring station is approximately 15 miles north of the closest Draft Housing Opportunity Site (Number 1). Table 4.2-2 indicates the number of days that each of the air quality standards have been exceeded at the stations during the monitoring period from 2018 through 2020. 8-hour ozone exceeded both state and federal thresholds twice in 2019 and once in 2020. 1-hour ozone exceeded state thresholds once in 2020. PM_{2.5} exceeded federal thresholds 13 times in 2018 and 9 times in 2020. PM₁₀ exceeded state thresholds twice in 2020. No other thresholds were exceeded in the years 2018 through 2020.

Table 4.2-2 Ambient Air Quality at Nearest Monitoring Stations

Pollutant	2018	2019	2020
Redwood City Station			
8-Hour Ozone (ppm), maximum	0.050	0.077	0.078
Number of days of state exceedances (>0.070 ppm)	0	2	1
Number of days of federal exceedances (>0.070 ppm)	0	2	1
1-hour Ozone (ppm), maximum	0.067	0.083	0.098
Number of days of state exceedances (>0.09 ppm)	0	0	1
Number of days of federal exceedances (>0.112 ppm)	0	0	0
Nitrogen dioxide (ppb), 1-hour maximum	77	54	45
Number of days of state exceedances (>180 ppb)	0	0	0
Number of days of federal exceedances (>100 ppb)	0	0	0
Particulate matter <2.5 microns, µg/m ³ , 24-hour maximum	120.9	29.5	124.1
Number of days above federal standard (>35 µg/m ³)	13	0	9
San Francisco-Arkansas Street Station			
Particulate matter <10 microns, µg/m ³ , 24-hour maximum	43	42	105
Number of days of state exceedances (>50 µg/m ³)	0	0	2
Number of days of federal exceedances (>150 µg/m ³)	0	0	0
ppm = parts per million			
µg/m ³ = micrograms per cubic meter			
Source: CARB 2021b			

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient to protect public health and welfare, with a margin of safety. They are designed to protect that segment of the public most susceptible to the effects of air pollutants and subsequent respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. Therefore, most of the sensitive receptor locations are schools, hospitals, senior living centers, and residential areas.

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The USEPA is charged with implementing national air quality programs. USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting NAAQS and the Prevention of Significant Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States.

National Ambient Air Quality Standards

The federal CAA requires USEPA to establish primary and secondary NAAQS for several criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. NAAQS have been established for ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and Pb.

b. State Regulations

California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. CARB is the State air pollution control agency and is a part of CalEPA. CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB oversees local district compliance with federal and California laws, approves local air quality plans, submits the State implementation plans to the USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California CAA requires CARB to establish ambient air quality standards for California, known as CAAQS. Similar to the NAAQS, CAAQS have been established for criteria pollutants and standards are established for vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In general, the CAAQS are more stringent than the NAAQS on criteria pollutants. The California CAA

requires all local air districts to endeavor to achieve and maintain the CAAQS by the earliest practical date. The California CAA specifies that local air districts focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

CARB released a technical advisory on reducing air pollution near high-volume roadways to clarify the 500-foot recommendation from 2005 due to the increased focus on and benefits from infill development, which can often occur within 500 feet of a major roadway (CARB 2017). As described in the technical advisory, California has implemented various measures to improve air quality and reduce exposure to traffic emissions. These include the Diesel Risk Reduction Plan, which aims to reduce particulate matter emissions from diesel vehicles. The continued electrification of California's vehicle fleet would also reduce PM_{2.5} levels, and ongoing efforts to reduce emissions from cars and trucks and to move vehicles towards "zero emission" alternatives will continue to drive down traffic pollution (CARB 2017).

As shown in Table 4.2-2, the nearest monitoring stations to the Draft Housing Opportunity Sites have shown the area to have relatively clean air, with only one exceedance of ozone and a handful of exceedances of PM_{2.5}.

c. Local Regulations

Bay Area Air Quality Management District

The BAAQMD is the agency primarily responsible for assuring national and State ambient air quality standards are attained and maintained in the SFBAAB. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. The BAAQMD has jurisdiction over much of the nine-county Bay Area, including the City of Belmont.

The BAAQMD adopted the 2017 Clean Air Plan as an update to the 2010 Clean Air Plan. The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate, which would apply to SFBAAB. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_x—and reduce transport of ozone and its precursors to neighboring air basins, such as stationary-source control measures to be implemented through the BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. In addition, the 2017 Clean Air Plan builds upon and enhances the BAAQMD's efforts to reduce emissions of fine particulate matter and toxic air contaminants. The 2017 Clean Air Plan also represents the Bay Area's most recent triennial assessment of the region's strategy to attain the state 1-hour ozone standard (BAAQMD 2017a).

City of Belmont 2035 General Plan

The City of Belmont's 2035 General Plan, adopted in November 2017, lists several air quality goals, policies, and actions as part of the Conservation Element that support the goals of BAAQMD. The following goals, policies, and actions are applicable to the proposed project (City of Belmont 2017a):

Goal 5.10 Reduce emissions of ozone-producing pollutants and particulate matter to improve regional air quality and protect the health of Belmont and Bay Area residents.

Policy 5.10-1: Coordinate air quality planning efforts with other local, regional, and State agencies.

Action 5.10-1a: Support the Bay Area Air Quality Management District's efforts to reduce pollution and improve air quality through the Spare the Air program, which includes restrictions on wood smoke pollution and transportation-related air pollution emissions.

Policy 5.10-3: Ensure that construction and grading activities minimize short-term impacts to air quality by employing appropriate mitigation measures and best practices.

Policy 5.10-2: Require that new development with sensitive uses that is located adjacent to sources of toxic air contaminants (TAC) be designed to minimize any potential health risks.

Action 5.10-3a: Require applicants proposing new development projects within the Planning Area to require their contractors, as a condition of contract, to reduce construction-related GHG emissions by implementing BAAQMD's recommended best management practices, including (but not limited to) the following measures (based on BAAQMD's (2011) *CEQA Guidelines*):

- Use local building materials of at least 10 percent (sourced from within 100 miles of the planning area).
- Recycle and reuse at least 50 percent of construction waste or demolition materials.

Policy 5.10-4: Support land use, transportation management, infrastructure, and environmental planning programs that reduce vehicle emissions and improve air quality.

Action 5.10-4a: Implement the recommendations in the City's transportation studies, such as those in the Ralston Avenue Corridor Study, to ease congestion, improve multimodal mobility, and reduce traffic generated exhaust.

Action 5.10-4b: Consistent with the goals and policies in the Land Use Element and development patterns shown on the Land Use Diagram, promote mixed use development in Belmont Village and along the El Camino Real Corridor that is supportive of alternative modes of transportation (public transit, walking, bicycling, etc.) and lessens the need for and length of vehicle trips.

Policy 5.10-5: Provide information about non-toxic alternatives to construction, interior and exterior finishes and furnishings, and planting and landscaping maintenance to contractors, business owners and homeowners to enhance indoor and outdoor air quality and reduce exposure to toxins.

Policy 5.10-6: Ensure compliance with the most current Bay Area Clean Air Plan by implementing the Plan's recommended Transportation Control Measures (TCMs).

4.2.3 Impact Analysis

a. Thresholds of Significance

To determine whether a project would result in a significant impact to air quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Conflict with or obstruct implementation of the applicable air quality plan
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard
3. Expose sensitive receptors to substantial pollutant concentrations
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

BAAQMD Significance Thresholds

This analysis uses the BAAQMD's May 2017 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the May 2017 BAAQMD *CEQA Air Quality Guidelines* were used to determine whether the proposed project impacts exceed the thresholds identified in *CEQA Guidelines* Appendix G.

Consistency with Air Quality Plan

Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan
2. Includes applicable control measures from the 2017 Clean Air Plan
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures

Short-Term Emissions Thresholds

The BAAQMD's May 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include project-level screening and emissions thresholds for temporary construction-related emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions and are discussed in detail below (BAAQMD 2017b).

The BAAQMD developed screening criteria in the 2017 *CEQA Air Quality Guidelines* to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. The screening criteria for residential land uses are shown in Table 4.2-3.

Table 4.2-3 BAAQMD Criteria Air Pollutant Screening Levels

Land Use Type	Operational Criteria Pollutant Screening Size (du)	Construction Criteria Pollutant Screening Size (du)
Single-family	325 (NO _x)	114 (ROG)
Apartment, low-rise	451 (ROG)	240 (ROG)
Apartment, mid-rise	494 (ROG)	240 (ROG)
Apartment, high-rise	510 (ROG)	249 (ROG)
Condo/townhouse, general	451 (ROG)	240 (ROG)
Condo/townhouse, high-rise	511 (ROG)	252 (ROG)
Mobile home park	450 (ROG)	114 (ROG)
Retirement community	487 (ROG)	114 (ROG)
Congregate care facility	657 (ROG)	240 (ROG)

du = dwelling unit; NO_x = oxides of nitrogen; ROG = reactive organic gases
Source: BAAQMD 2017b

If a project meets the screening criteria, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (BAAQMD 2017b).

In addition to the screening levels above, several additional factors are outlined in the 2017 *CEQA Air Quality Guidelines* that construction activities must satisfy for a project to meet the construction screening criteria:

- All basic construction measures from the 2017 CEQA Guidelines must be included in project design and implemented during construction
- Construction-related activities would not include any of the following:
 - Demolition
 - Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously)
 - Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development)
 - Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity

For projects that do not meet the screening criteria above, the BAAQMD construction significance thresholds for criteria air pollutants, shown in Table 4.2-3, are used to evaluate a project's potential air quality impacts.

Table 4.2-4 BAAQMD Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds Average Daily Emissions (lbs/day)	Operational Threshold Average Daily Emissions (lbs/day)	Operational Threshold Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	Not Applicable

lbs = pounds; NO_x = oxides of nitrogen; ROG = reactive organic gases; PM_{2.5} = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
Source: BAAQMD 2017b

For all projects in the SFBAAB, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Basic Construction Mitigation Measures listed in Table 8-2 of the Guidelines (BAAQMD 2017b). For projects that exceed the thresholds in Table 4.2-4, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Additional Construction Mitigation Measures listed in Table 8-3 of the Guidelines (BAAQMD 2017b).

Long-Term Emissions Thresholds

The BAAQMD's 2017 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures
- Vehicle miles traveled (VMT) or vehicle trips (VT) increase is less than or equal to the plan's projected population increase

If a plan can demonstrate consistency with both criteria, then impacts would be less than significant. The current air quality plan is the 2017 Clean Air Plan.

For project-level thresholds, the screening criteria for operational emissions are shown in Table 4.2-3. For projects that do not meet the screening criteria, the BAAQMD operational significance thresholds for criteria air pollutants, shown in Table 4.2-4, are used to evaluate a project's potential air quality impacts.

Carbon Monoxide Hotspots

BAAQMD provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. If the following criteria are met, a project would result in a less than significant impact related to local CO concentrations:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

3. Project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Odors

The BAAQMD provides minimum distances for siting of new odor sources shown in Table 4.2-5. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source as shown in Table 4.2-5 within the specified distances of existing receptors.

Table 4.2-5 BAAQMD Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater Treatment Plant	2
Wastewater Pumping Facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2

Source: BAAQMD 2017b

b. Methodology

Short-Term Emissions

Construction-related emissions are generally short-term in duration but may still cause adverse air quality impacts. Construction of development facilitated by the project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances. Program-level construction impacts from the proposed project are discussed qualitatively. In addition, construction emissions are compared to the project-level thresholds for a theoretical 40-unit Draft Housing Opportunity Site² to determine the number of dwelling units that would exceed project-level thresholds.

Construction emissions for the theoretical 40-unit project on a Draft Housing Opportunity Site were modeled with CalEEMod, Version 2020.4.0. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices A, D, and E (California Air Pollution Control Officers Association [CAPCOA] 2021). CalEEMod output files for development facilitated by the project are included in Appendix AQ of this EIR.

² As described under Impact AQ-2, it was determined that a project that is 40 units or fewer would not exceed BAAQMD thresholds.

Construction input data for CalEEMod include but are not limited to: (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the theoretical project on a Draft Housing Opportunity Site. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Construction equipment estimates are based on surveys of construction projects within California conducted by members of the California Air Pollution Control Officers Association (CAPCOA 2021).

Demolition modeling assumed that demolition of all structures would be required on a given site (even if demolition of all structures would not be required for project implementation). The parcel at 1601 El Camino Road (Number 78) was identified as the Draft Housing Opportunity Site with the highest demolition amount based on aerial imagery. The site contains five existing structures totaling approximately 22,600 square feet that would be demolished for a conceptual project involving full site development.

Long-Term Emissions

Based on plan-level guidance from the BAAQMD 2017 *CEQA Air Quality Guidelines*, long-term operational emissions associated with implementation of the proposed project are analyzed qualitatively by comparing the proposed project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT versus population is recommended by BAAQMD for determining significance of criteria pollutants impacts. If the proposed project does not meet either criterion then impacts would be potentially significant.

c. Project Impacts and Mitigation Measures

Threshold:	Would the project conflict with or obstruct implementation of the applicable air quality plan?
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Impact AQ-1 THE PROJECT WOULD SUPPORT THE PRIMARY GOALS OF THE 2017 CLEAN AIR PLAN, WOULD IMPLEMENT APPLICABLE CONTROL MEASURES FROM THE 2017 CLEAN AIR PLAN, AND WOULD NOT DISRUPT OR HINDER IMPLEMENTATION OF 2017 CLEAN AIR PLAN CONTROL MEASURES. THE PROJECT'S VMT INCREASE WOULD BE LESS THAN THE POPULATION INCREASE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Air Quality Plans

Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

- Supports the primary goals of the 2017 Clean Air Plan,
- Includes applicable control measures from the 2017 Clean Air Plan, and
- Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The primary goals of the 2017 Clean Air Plan are to:

- Protect air quality and health at the regional and local scale; and
- Protect the climate.

A project that would not support these goals would not be consistent with the 2017 Clean Air Plan. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan goals. The project would encourage denser housing on the Draft Housing Opportunity Sites in urban areas, near transit, Downtown jobs, services, and open spaces at various levels of affordability. By allowing for the easier use of alternative modes of transportation through proximity to services, bus stops, the Caltrain stations and bike routes, development facilitated by the project could reduce the use of personal vehicles and subsequent mobile emissions. In addition, development facilitated by the project would be required to comply with the latest Title 24 regulations, including requirements for residential indoor air quality. These requirements currently mandate a Minimum Efficiency Reporting Value 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]) or would implement future standards that would be anticipated to be equal to or more stringent than current standards. Therefore, the project would have the effect of reducing mobile and stationary emissions compared to existing conditions. The 2017 Clean Air Plan includes 85 control measures under the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these measures are industry-specific and would not be applicable to development facilitated by the project (e.g., stationary sources, agriculture, and natural and working lands). Measures from transportation, energy, building, water, waste, and super-GHG pollutants sectors are focused on larger-scale planning efforts (e.g., transit funding, utility energy procurement, regional energy plans) and would not directly apply to development facilitated by the project. The project would be consistent with the overall goal of these measures as development facilitated by it would be required to comply with the latest Title 24 regulations and would increase density in urban areas, allowing for greater use of alternative modes of transportation. Development facilitated by the project does not contain elements that would disrupt or hinder implementation of any 2017 Clean Air Plan control measures. Therefore, the project would conform to this determination of consistency for the 2017 Clean Air Plan.

Project VMT and Population

According to the BAAQMD 2017 *CEQA Air Quality Guidelines*, the threshold for criteria air pollutants and precursors includes an assessment of the rate of increase of plan VMT versus population growth. As discussed above under Section 4.2.3(a), to result in a less than significant impact, the analysis must show that over the planning period, the proposed project's projected VMT increase would be less than or equal to its projected population increase. The 2035 General Plan anticipated facilitating a maximum buildout for an estimated population of 4,100 persons, while the project would result in a population of an estimated 8,250 persons (see Section 4.12, *Population and Housing*). This is an approximate 97 percent increase.

Vehicle trips for development facilitated by the project were calculated using the daily VMT and are expected to increase over existing conditions by 101,574 VMT in 2040, per the transportation analysis (Appendix TRA). Theoretically, VMT in 2019 would have been 103,392 had the Draft Housing Opportunity Sites already been developed. Therefore, VMT is expected to decrease by 87 per year from 2019 to 2040, and in 2031, the full buildout year for the project, there would be approximately 102,353 VMT. Given that development facilitated by the project could increase housing by 3,300 dwelling units by 2031, an increase of approximately 31 VMT per day over existing conditions per dwelling unit would occur. Assuming 31 VMT per day per dwelling unit for the existing condition's 11,140 units, this would result in 345,340 VMT for existing conditions. Thus, the project would increase VMT approximately 29.6 percent over existing conditions.

The proposed net percentage VMT increase associated with the proposed project (approximately 29.6 percent) would be less than the net percentage population increase (approximately 31 percent, as described in section 4.12 *Population and Housing*). Therefore, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants and would be consistent with the 2017 Clean Air Plan. Accordingly, impacts would be less than significant.

Mitigation Measures

Mitigation Measures would not be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
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Impact AQ-2 CONSTRUCTION FACILITATED BY THE PROJECT WOULD TEMPORARILY INCREASE AIR POLLUTANT EMISSIONS, POSSIBLY CREATING LOCALIZED AREAS OF UNHEALTHY AIR POLLUTION LEVELS OR AIR QUALITY NUISANCES. IMPACTS WOULD BE POTENTIALLY SIGNIFICANT BUT MITIGABLE.

Construction

Plan-level

The SFBAAB is in non-attainment for the federal standards for ozone and PM_{2.5} and in non-attainment for the state standard for ozone, PM_{2.5}, and PM₁₀. Construction activity associated with the proposed project may involve activities that result in air pollutant emissions. Construction activities such as demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment would generate pollutant emissions. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions generated by construction equipment, particularly ROGs and NO_x emissions, would depend on the quantity of equipment used and the hours of operation for each project. The extent of PM_{2.5} and PM₁₀ emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines*, during construction PM₁₀ is the greatest pollutant of concern.

The BAAQMD has also identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation Measures are recommended for all projects (BAAQMD 2017b). Project construction would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances. BAAQMD has identified feasible fugitive dust control measures for construction activities because PM₁₀ is the greatest pollutant of concern (BAAQMD 2017b). Therefore, impacts related to construction emissions would be

significant for all projects and mitigation that would implement the basic construction mitigation measures would be required.

This analysis and conclusion are conservative because, as discussed in other sections of this EIR, the project would not substantially increase development potential in terms of allowed demolition, grading or square footage of construction for most of the Draft Housing Opportunity Sites.

Project-level

The BAAQMD 2017 *CEQA Air Quality Guidelines* also include project-level thresholds for construction emissions. If a project does not meet BAAQMD construction screening levels (see Table 4.2-3) or the project's construction emissions exceed the project-level thresholds (see Table 4.2-4), the project's emissions would be significant and mitigation that would implement the BAAQMD 2017 *CEQA Air Quality Guidelines'* Additional Construction Mitigation Measures would be required.

A summary of development on Draft Housing Opportunity Sites requiring Additional Construction Mitigation Measures is included in Table 4.2-6. Details on how these Draft Housing Opportunity Sites were determined are discussed below.

Table 4.2-6 Draft Housing Opportunity Sites Requiring Additional Construction Mitigation Measures

Requirement ¹	Draft Housing Opportunity Site
Requires Additional Construction Mitigation Measures if development of Draft Housing Opportunity Site results in an increase of greater than 114 dwelling units over existing conditions	10 and 29
Regardless of dwelling units, requires Additional Construction Mitigation Measures if development of Draft Housing Opportunity Site includes demolition, simultaneous occurrence of more than two construction phases, simultaneous construction of more than one land use type, or extensive material transport of more than 10,000 cubic yards.	10, 12, 29, 41, 54, 65, 81, and 82

¹ Requirements are from BAAQMD 2017 CEQA Air Quality Guidelines (BAAQMD 2017b).

As discussed in Section 4.2.3, *Short-Term Emissions Thresholds*, the BAAQMD has construction screening levels based upon number of dwelling units that screens a project from a construction or operation criteria pollutants emissions analysis. Projects below that number of units would have less than significant criteria pollutant impacts and would not have to implement additional construction mitigation measures. For construction, the screening level would be 114 dwelling units for a residential project, regardless of the parcel size. Sites that would not be under the screening level, as they include an increase of greater than 114 dwelling units over existing conditions, would include Sites 10 and 29.

Regardless of number of dwelling units, a Draft Housing Opportunity Site would also exceed the screening level if it would exceed project-level thresholds (see Table 4.2-4) and meet the four criteria listed in Section 4.2.3(a) under *Short Term Emissions*.

To determine which of the Draft Housing Opportunity Sites may fall within this category, a modeled project was analyzed to determine the maximum dwelling unit increase for a Draft Housing Opportunity Site that would remain under the BAAQMD thresholds. It was determined that a project that is 40 units or less would not exceed BAAQMD thresholds. Table 4.2-7 summarizes the estimated maximum daily emissions of pollutants associated with construction that could result

from a project with a net increase of 40 mid-rise apartment dwelling units. As shown in the table, ROG, NO_x, PM₁₀, and PM_{2.5} emissions would not exceed BAAQMD thresholds for a 40-unit mid-rise apartment residential project. A project that would be greater than 40 units would potentially exceed BAAQMD thresholds and thus those Draft Housing Opportunity Sites greater than 40 units would be a potentially significant impact requiring additional construction mitigation measures (Mitigation Measure AQ-2). As listed in Table 4.2-6, this would include the following Draft Housing Opportunity Sites: 10, 12, 29, 41, 54, 65, 81 and 82.

Table 4.2-7 Modeled Project (40 Units) Construction Emissions

	ROG ¹	NO _x ¹	CO ¹	SO ₂ ¹	PM ₁₀ ^{1, 2}	PM _{2.5} ^{1, 2}
Construction Year 2023	2	15	14	<1	0.7	0.6
Construction Year 2024	50	11	13	<1	0.5	0.4
Maximum Emissions	50	15	14	<1	0.7	0.6
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	No	No	No	No

¹ Maximum emissions (lbs/day)

²Exhaust only. Fugitive dust is not included considering that BAAQMD does not have a quantitative threshold.

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO and SO₂.

Notes: See Appendix AQ for modeling results. Some numbers may not add up precisely due to rounding considerations.

This analysis and conclusion are conservative because, as discussed in other sections of this EIR, the project would not substantially increase development potential in terms of allowed demolition, grading or square footage of construction for most of the Draft Housing Opportunity Sites.

Fugitive Dust

Site preparation and grading may generate wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices for fugitive dust control during construction would have a less than significant impact related to fugitive dust emissions. Development facilitated by the project would be required to implement Mitigation Measures AQ-1 and AQ-2.

Operation

BAAQMD has developed specific plan-level impact threshold for operational emissions. As stated in the BAAQMD May 2017 *CEQA Air Quality Guidelines*, the operational threshold for plans (e.g., general plans, community plans, specific plans, etc., which this project would be similar to) within the SFBAAB is consistency with the current Clean Air Plan and whether projected VMT or vehicle trip increase is less than or equal to projected population increase. As discussed under Impact AQ-1, the proposed project would be consistent with the 2017 Clean Air Plan and the increase in VMT would

not exceed the projected population increase per the BAAQMD *CEQA Guidelines* for operational emissions from plans. Therefore, impacts to operational emissions would be less than significant.³

Mitigation Measures

The BAAQMD 2017 *CEQA Air Quality Guidelines* Basic Construction Mitigation Measures would be required for all projects to reduce temporary construction impacts through implementation of Mitigation Measure AQ-1.

AQ-1 Basic Construction Mitigation Measures

All development facilitated by the project shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM₁₀ and PM_{2.5}) by implementing the BAAQMD's Basic Construction Mitigation Measures (described below) or equivalent, expanded, or modified measures based on project and site-specific conditions.

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, with priority given to the use of recycled water for this activity when feasible.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
8. A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

³ The project-level screening criteria for operational emissions is 325 dwelling units for single-family residences and 451 dwelling units for multi-family residences. The greatest change in allowable dwelling units would occur at 815 Old County Road with an increase of 154 dwelling units. Therefore, on a project-by-project level, no development facilitated by the project would exceed either the single-family or multi-family residential screening criteria threshold for operational emissions. As stated in the BAAQMD CEQA Air Quality Guidelines, if the project meets the screening criteria, the project would not result in the generation of operational-related criteria air pollutants that exceed the thresholds of significance shown in Table 4.2-4. Therefore, operational criteria pollutant impacts from development facilitated by the project would be less than significant.

AQ-2 Additional Construction Mitigation Measures

In addition to implementation of Mitigation Measure AQ-1, for a project that meets the following conditions the City shall condition the project to implement BAAQMD CEQA Air Quality Guidelines' Additional Construction Mitigation Measures:

1. Exceed the BAAQMD construction screening threshold of a change in allowable dwelling units of 114 dwelling units for single-family residences or 240 dwelling units for multi-family residences
2. Would result in a change in allowable dwelling units of more than 40 units
3. Would require demolition or simultaneous occurrence of more than two construction phases
4. Simultaneous construction of more than one land use type (e.g., a mixed-use project involving commercial and residential)
5. Extensive material transport of more than 10,000 cubic yards

In addition to implementation of Mitigation Measure AQ-1, for Draft Housing Opportunity Sites that meet the criteria listed above, the following measures (or equivalent, expanded, or modified measures based on project- and site-specific conditions) shall be implemented throughout construction of the project:

1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel.
8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1 percent.
9. Minimizing the idling time of diesel-powered construction equipment to 2 minutes.
10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO_x reduction and 45 percent PM reduction compared to the most recent ARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).

12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM.
13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines.

Significance After Mitigation

For Draft Housing Opportunity Sites that meet any of the five conditions listed above, impacts would be less than significant with implementation of Mitigation Measures AQ-1 and AQ-2. For Draft Housing Opportunity Sites that do not meet any of the five conditions listed above, impacts would be less than significant with implementation of Mitigation Measure AQ-1 which would require implementation of BAAQMD Basic Construction Mitigation Measures for all projects at the Draft Housing Opportunity Sites.

Threshold:	Would the project expose sensitive receptors to substantial pollutant concentrations?
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Impact AQ-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS FROM CO HOTSPOTS OR TACs. HOWEVER, DEVELOPMENT FACILITATED BY THE PROJECT WOULD SITE NEW SENSITIVE LAND USES NEAR SUBSTANTIAL POLLUTANT GENERATING LAND USES ALONG EL CAMINO REAL AND NEAR HIGHWAY 101. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Carbon Monoxide Hotspots

As identified in the BAAQMD 2017 *CEQA Air Quality Guidelines*, a project would result in a less than significant impact related to CO concentrations if it is consistent with an applicable congestion management program; would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

According to the transportation analysis, project buildout of 3,300 multifamily housing units would generate a total of 17,544 daily vehicle trips (Appendix TRA). This would be substantially below the 44,000 vehicle per hour threshold described above. Therefore, development facilitated by the project would not result in individually or cumulatively significant impacts from CO emissions, and impacts would be less than significant.

Toxic Air Contaminants

Construction

Construction-related activities would result in short-term emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer⁴ health impacts (CARB 2021a).

⁴ Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2021a).

Generation of DPM from construction typically occurs in a single area for a short period. Construction of development facilitated by the project would occur over approximately a decade but use of diesel-powered construction equipment in any one area would likely occur for no more than a few years for an individual project and would cease when construction is completed in that area. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual⁵. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the development (OEHHA 2015). BAAQMD use an exposure period of 30 years (BAAQMD 2016).

The maximum PM_{2.5} emissions, which is used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would not be expected to last longer than a year for the largest development. A construction period of one year would represent a small percentage of the typical health risk calculation periods. PM_{2.5} emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, DPM generated by construction from development facilitated by the project would not result in conditions where the probability that the maximally exposed individual would contract cancer is greater than 10 in 1 million or to generate ground-level concentrations of noncarcinogenic TACs that exceed a hazard index greater than one for the maximally exposed individual. This impact would be less than significant.

Operation

In the Bay Area, there are several urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. However, according to the BAAQMD *CEQA Guidelines* (Figure 5-1), none of the Draft Housing Opportunity Sites are in an impacted community. (There are no impacted sites in the City of Belmont.) Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities (BAAQMD 2017b). Operation of development facilitated by the project would not involve these uses; therefore, it is not considered a source of TACs. In addition, residences do not typically include new stationary sources onsite, such as emergency diesel generators. However, if residences did include a new stationary source onsite, it would be subject to BAAQMD Regulation 2, Rule 2 (New Source Review) and require permitting. This process would ensure that the stationary source does not exceed applicable BAAQMD health risk thresholds. Additionally, BAAQMD employs the Community Air Risk Evaluation (CARE) Program, which applies strategies to reduce health impacts in impacted communities (BAAQMD 2014). CARE is not active in Belmont but would activate in the event that Belmont became an impacted community. This impact would be less than significant.

⁵ A hypothetical individual who -- because of proximity, activities, or living habits -- could potentially receive the maximum possible dose of DPM during construction.

Asbestos

BAAQMD Regulation 11, Rule 2 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities (BAAQMD 2017a). The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires the Lead Agency and its contractors to notify BAAQMD of any regulated renovation or demolition activity. This notification includes a description of structures and methods utilized to determine whether asbestos-containing materials are potentially present. All asbestos-containing material found on the site must be removed prior to demolition or renovation activity in accordance with BAAQMD Regulation 11, Rule 2, including specific requirements for surveying, notification, removal, and disposal of material containing asbestos. Therefore, projects that comply with Regulation 11, Rule 2 would ensure that asbestos-containing materials would be disposed of appropriately and safely. By complying with BAAQMD Regulation 11, Rule 2, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality. Per the BAAQMD Guidelines, because BAAQMD Regulation 11, Rule 2 is in place, no further analysis about the demolition of asbestos-containing materials is needed in a CEQA document (BAAQMD 2017).

Project Siting

Development facilitated by the project would occur under the jurisdictions of BAAQMD. CARB screening methodology for project siting is used in this analysis. In 2005, CARB issued recommendations to avoid siting new residences within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day or close to known stationary TAC sources (CARB 2005). BAAQMD's average daily traffic (ADT) threshold is lower, at 10,000 vehicles per day (BAAQMD 2012). According to the transportation analysis, El Camino Real, has an ADT in exceedance of the BAAQMD threshold (Appendix TRA). Therefore, development facilitated by the project along El Camino Real would result in a potentially significant impact and implementation of Mitigation Measure AQ-3 for future development on those sites would be required.

Development facilitated by the project could place sensitive receptors living in housing within approximately 500 feet of Highway 101. The only Draft Housing Opportunity Site within 500 feet of Highway 101 is Site 27. Development of Site 27 would create a potentially significant impact and implementation of Mitigation Measure AQ-3 would be required for future development.

Development facilitated by the project would be required to comply with the residential indoor air quality requirements in the Title 24 Building Energy Efficiency Standards, which currently require Minimum Efficiency Reporting Value 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]). Therefore, the project would not expose its future sensitive receptors to substantial pollutant concentrations.

Mitigation Measures

AQ-3 Roadway Health Risk Assessment

Prior to issuance of building permits for residential developments within 1,000 feet of State Route 82 (i.e., El Camino Real), a roadway health risk assessment (HRA) shall be prepared by a qualified air quality analyst. An HRA shall also be prepared for residential development on Site 27 since it is within 500 feet of Highway 101. The roadway HRAs shall demonstrate that roadway impacts are below the BAAQMD's single-source risk and hazard thresholds. If risks and hazards exceed the

applicable BAAQMD thresholds, then feasible project design features such as high-efficiency filtration shall be incorporated into the project. Screening tools may be used to assess health risks in lieu of a roadway HRA if said tools are the most current published BAAQMD tools.

Significance After Mitigation

Impacts would be less than significant with implementation of Mitigation Measure AQ-3.

Threshold:	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
-------------------	--

Impact AQ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people.

Table 4.2-5 provides BAAQMD odor screening distances for land uses with the potential to generate substantial odor complaints. Those uses include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants. As development facilitated by the project would be residential, none of the uses identified in the table would occur on the sites. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people during operation. This impact would be less than significant.

Mitigation Measures

Mitigation measures would not be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.2.4 Cumulative Impacts

The cumulative context for air quality is regional. The SFBAAB is in non-attainment for federal standards of ozone and PM_{2.5} and in non-attainment for the State standard for ozone, PM_{2.5}, and PM₁₀. The SFBAAB is in attainment of all other federal and State standards. Development facilitated by the project would generate particulate matter and the ozone precursors (ROG and NO_x) in the area during construction and operation. As described under Impact AQ-1, the project would be consistent with the overall goal of the 2017 Clean Air Plan control measures as development facilitated by the Housing Element would comply with the latest Title 24 regulations and would increase density in urban areas in proximity to transit, allowing for greater use of alternative modes of transportation. Development facilitated by the project does not contain elements that would disrupt or hinder implementation of any 2017 Clean Air Plan control measures. In addition, the project would support the primary goals of the 2017 Clean Air Plan. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region. Therefore, the project would not result in a cumulatively considerable contribution to a conflict with or obstruction of implementation of the applicable air quality plan.

As described under Impact AQ-1 the proposed project would be consistent with the 2017 Clean Air Plan and the increase in VMT would not exceed the projected population increase per the BAAQMD *CEQA Air Quality Guidelines* for operational emissions from plans. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region; therefore, with mitigation the project would not result in a cumulatively considerable net increase of a criteria pollutant from operational emissions.

As described under Impact AQ-2, project construction would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances. BAAQMD has identified feasible fugitive dust control measures for construction activities because fugitive PM₁₀ and PM_{2.5} is of concern. These temporary impacts would be mitigated with Mitigation Measures AQ-1 and AQ-2. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region; therefore, with mitigation the project would not result in a cumulatively considerable net increase of a criteria pollutant from construction emissions.

As identified under Impact AQ-3, development facilitated by the project would not have a significant impact from CO hotspots or TACs. Discussion of these impacts considers the cumulative nature of the pollutants in the region, e.g., the cancer risk and non-cancer risk thresholds have been set per existing cancer risks in the area and exceeding those thresholds would be considered a cumulative impact. As development facilitated by the project does not exceed those thresholds, it would not expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from CO hotspots or TACs.

As identified under Impact AQ-4, development facilitated by the project would not have a significant impact from odor emissions. The consideration of cumulative odor impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of the short range of odor dispersion. It is unlikely that construction of Draft Housing Opportunity Sites would occur within a few hundred yards of major off-site construction. Therefore, development facilitated by the project would not result in a cumulatively considerable odor impact.

4.3 Biological Resources

This section addresses impacts to biological resources, including sensitive natural communities, special-status species, regulated waterways and wetlands, sensitive habitat and mature native trees, and wildlife movement corridors, associated with the implementation of the proposed project.

4.3.1 Environmental Setting

The City of Belmont is located in San Mateo County along the San Francisco Bay about halfway between San Francisco and San Jose. The City is bordered by the south San Francisco Bay to the east, the Crystal Springs watershed lands for the San Francisco Public Utilities District to the west, and the Cities of San Mateo and San Carlos to the north and south, respectively. Belmont is primarily developed with residential and commercial uses, although it includes some extensive areas of natural open space. Belmont Creek, which has a watershed of about 3 square miles, originates in the western portion of the City and flows east through the City for about three miles into a tributary of the San Francisco Bay.

a. Vegetation Communities and Other Land Cover Types

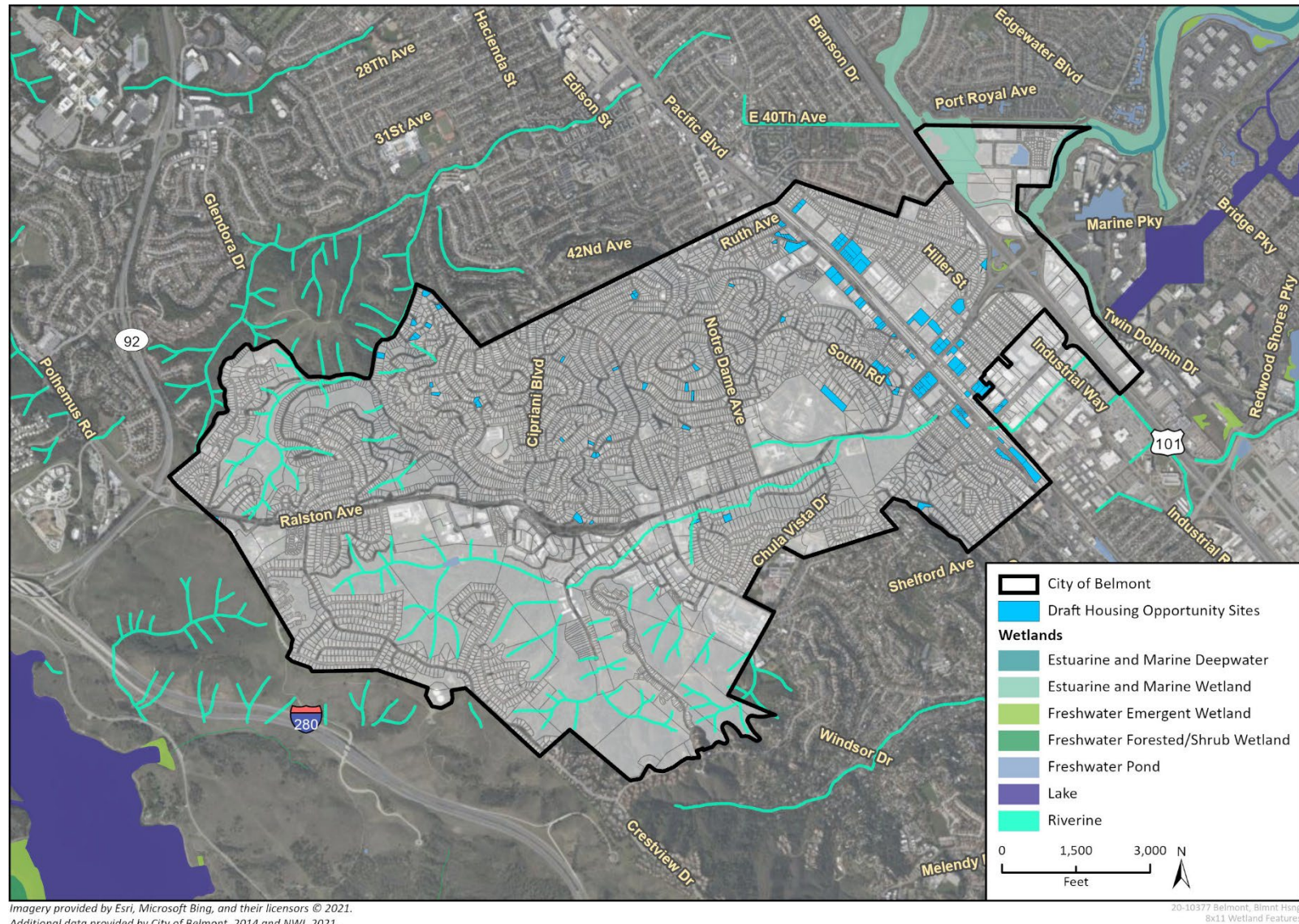
Notable natural landmarks in Belmont include the San Juan Hills, Western Hills, Water Dog Lake, and Belmont Creek. The watershed for the San Francisco Public Utilities District is located to the west of Belmont, and Sugarloaf Mountain is located to the north. These connected open spaces provide travel corridors for wildlife and help to support a diversity of plant and animal species. They also play important roles in stormwater management, ecological functions, and other environmental conservation efforts.

The vegetation communities in Belmont's natural open spaces vary widely from tree- and shrub-dominated vegetation communities in the western hills to herbaceous-dominated vegetation communities and aquatic vegetation communities in eastern Belmont. The tree-dominated vegetation communities include Valley Oak Woodland, Valley Foothill Riparian, Coastal Oak Woodland, Montane Hardwood, and Blue Oak Woodland. Shrub-dominated vegetation communities are found mostly in the southwestern area of Belmont and include Chamise-Redshank Chaparral and Coastal Scrub. Herbaceous-dominated vegetation communities include Saline Emergent Wetland near the O'Neill Slough and Annual Grass in the far western hills. The BVSP Area is largely free from natural vegetation communities, with only a small area of Coast Oak Woodland and Lacustrine aquatic vegetation communities falling within its boundary.

b. Wetlands

The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) is a publicly available resource that provides detailed information on the abundance, characteristics, and distribution of wetlands. Some wetland and stream features, such as freshwater seeps and springs, are generally not identified as part of the NWI because of the general scale of the mapping effort. Major wetland and waterways in Belmont based on NWI mapping, are shown below in Figure 4.3-1. Wetland features that have been mapped either in or near Belmont include rivers, estuarine and marine deepwater and wetlands, freshwater emergent wetlands, freshwater ponds, and lacustrine (USFWS 2021a). A description of each of these aquatic features is provided below.

Figure 4.3-1 Wetlands in Belmont



Riverine

Riverine occurs along Belmont Creek and its seasonally influenced tributaries, and East Laurel Creek and its seasonally-influenced tributaries within the City of Belmont. Although these areas have been classified as riverine, many of these areas in Belmont usually do not have flowing water. Areas that have flowing water provide habitat for insects, commonly including mayfly (*Ephemeroptera*) and caddisfly (*Trichoptera*) nymphs, which attract insectivorous birds such as swallows (*Hirundinidae*) and flycatchers (*Tyrannidae*).

Wetlands

The Belmont Slough along the coast provides estuarine and marine deepwater features characterized by permanently subtidal—brackish and saltwater—water. There are also areas of estuarine and marine wetland around the Belmont Slough within the City of Belmont. These features are intertidal— not permanently flooded. There are also freshwater emergent wetlands and freshwater ponds in the median between Highway 101 and Marine Parkway ramps, according to the NWI (USFWS 2021a).

Lacustrine

There are two lacustrine features east of Highway 101 and the City of Belmont. There are additional lacustrine features at the intersection of Concourse Place and Clipper Drive, in the northeast corner of the City and Water Dog Lake along Belmont Creek in west Belmont. Lacustrine features contain standing water due to depressions in elevation or dammed channels that can be both permanent and intermittent. Phytoplankton and the organisms that consume them, such as rotifers, copepods, and cladocerans, are characteristic of lacustrine habitat. In shallower areas, duckweed (*Lemnoideae*) may cover the surface, and in deeper areas water lilies (*Nymphaea*) and smartweeds (*Polygonum*) are common. Lacustrine features can be found throughout California, although are less common in arid regions.

Jurisdictional Waters

Based on aerial photography, NWI mapping, and proximity to the Pacific Ocean, Belmont Creek and the East Laurel Creek, as well as natural drainages in Belmont are likely subject to U.S. Army Corps of Engineers (USACE) jurisdiction under section 404 of the Clean Water Act. In addition, these wetlands and riverine features are subject to California Department of Fish and Wildlife (CDFW) and State Water Resources Control Board (SWRCB) jurisdiction.

c. Sensitive Natural Communities and Critical Habitats

Definitions

Sensitive natural communities are vegetation types, associations, or sub-associations that support concentrations of special-status plant and/or wildlife species, are of relatively limited distribution, and/or are of particular value to wildlife. Currently, CDFW publishes the California Sensitive Natural Communities List online. Natural Communities are evaluated using NatureServe's Heritage Methodology, the same system used to assign global and State rarity ranks for plant and animal species in the California Natural Diversity Database (CNDDDB). Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (State) rank ranging from 1 (very rare and threatened) to 5 (demonstrably

secure). According to the CDFW Vegetation Program, Natural Communities with State ranks of S1-S3 and certain other specified associations are considered imperiled, and thus, potentially of special concern. Natural Communities with these ranks are generally addressed during CEQA environmental review with compensatory mitigation prescribed for impacts as applicable. Riparian areas are also considered sensitive natural communities by CDFW.

Critical habitat is a term used in the federal Endangered Species Act (ESA) and defined as a specific geographic area (or areas) that contain features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. These areas provide notice to the public and land managers of the importance of these areas to the conservation of a listed species. Special protections and/or restrictions are possible in these areas when federal funding, permits, licenses, authorizations, or actions occur or are required.

Sensitive Natural Communities in the City

The CDFW's CNDDDB lists five sensitive natural communities that occur within the U.S. Geological Survey (USGS) *San Mateo* and eight surrounding 7.5-minute series quadrangles (*Redwood Point*, *Palo Alto*, *Woodside*, *Half Moon Bay*, *Montara Mountain*, *San Francisco South*, *Hunters Point*, and *San Leandro*). Northern Coastal Salt Marsh is considered a sensitive natural community and occurs within Belmont along the O'Neill and Belmont Sloughs at the northeastern extent of the City. Additionally, several occurrences of Serpentine Bunchgrass are recorded immediately west of the City along the I-280 corridor in the Upper Crystal Springs open space area. Northern Maritime Chaparral, Valley Needlegrass Grassland, and Valley Oak Woodland also occur within the nine-quadrangle range; however, they are not found within or near the City of Belmont.

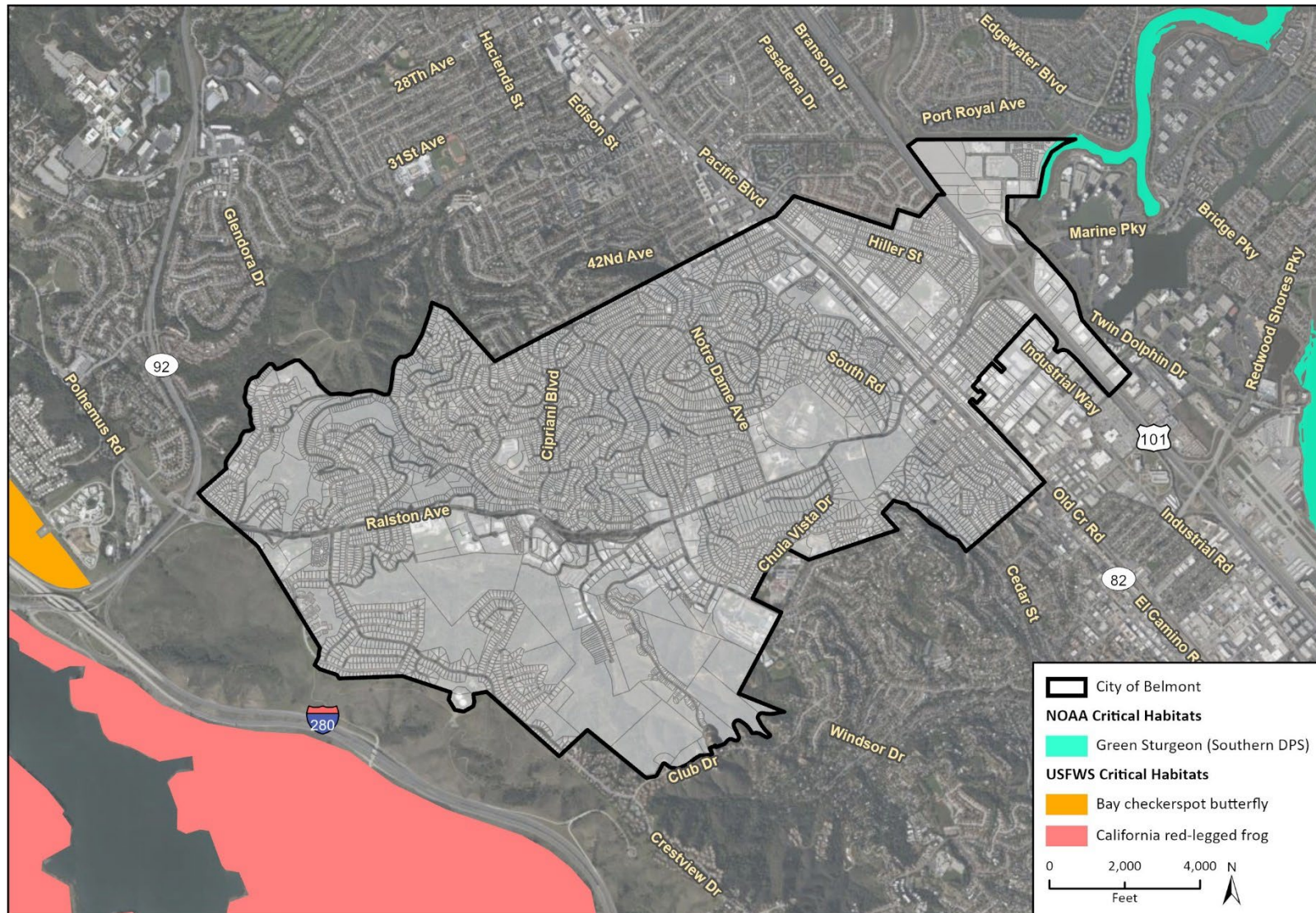
The USFWS Critical Habitat Mapper (2021b) and the National Marine Fisheries Service (NMFS) West Coast Critical Habitat website (2021) depict designated critical habitats in Belmont and its regional vicinity. A very small area of designated critical habitat for green sturgeon - southern DPS (*Acipenser medirostris*) occurs in the Belmont Slough within the City boundary at its far eastern edge, and is connected to the southern portion of the San Francisco Bay. Additionally, as shown on Figure 4.3-2, critical habitat is designated for California red-legged frog (*Rana draytonii*) and bay checkerspot butterfly (*Euphydryas editha bayensis*) immediately adjacent to Belmont in the Upper Crystal Springs open space area.

d. Special-Status Species

For the purpose of this analysis, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS and/or NMFS under the federal Endangered Species Act; those listed or proposed for listing as threatened or endangered by the CDFW under the California Endangered Species Act (CESA); plants listed as rare by the CDFW under the Native Plant Protection Act; and animals designated as "Species of Special Concern," "Fully Protected," or "Watch List" by the CDFW. Those plants ranked as California Rare Plant Rank (CRPR) 1 or 2 are typically regarded as rare, threatened, or endangered under CEQA by lead agencies and were considered as such in this EIR. The CRPR utilizes the following code definitions:

- **List 1A** = Plants presumed extinct in California
- **List 1B.1** = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences are threatened or have a high degree and immediacy of threat)

Figure 4.3-2 Critical Habitat in Belmont



Imagery provided by Microsoft Bing, and their licensors © 2021.
 Additional data provided by City of Belmont, 2014, USFWS, 2020, and NOAA, 2020.

20-10377 Belmont, Blinn Hong
 8x11 Critical Habitat

- **List 1B.2** = Rare or endangered in California and elsewhere; fairly endangered in California (20 to 80 percent of occurrences are threatened)
- **List 1B.3** = Rare or endangered in California and elsewhere but not very endangered in California (less than 20 percent of occurrences threatened or no current threats known)
- **List 2** = Rare, threatened or endangered in California, but more common elsewhere

CRPR List 3 species are “review list,” and CRPR 4 species are considered “watch list” species. CRPR 3 and 4 species do not typically warrant analysis under CEQA except where they are part of a unique community, from the type locality, or designated as rare or significant by local governments, or where cumulative impacts could result in population-level effects. The CRPR 3 and 4 species reported from the region are not locally designated as rare or significant by the City of Belmont or County of San Mateo General Plans and are not part of a unique community. Additionally, the City is not known to be the type locality for any ranked plant species. Therefore, potential impacts to CRPR 3 and CRPR 4 species were not considered in this analysis.

Belmont is home to species protected by federal and State agencies and the area surrounding the City also supports suitable habitat for special-status species. Information regarding the occurrences of special-status species in the vicinity of the City limits was obtained from a query of CDFW’s CNDDDB (CDFW 2021a), the USFWS Information for Planning and Conservation (IPaC) (USFWS 2021c), and the CNPS Inventory of Rare and Endangered Plants of California (CNPS 2021). The query of these data sources was conducted for the USGS *San Mateo* and eight surrounding 7.5-minute series quadrangles in August 2021. This query range encompasses the City limits and a five-mile buffer of the City limits. This is a sufficient distance to accommodate for regional habitat diversity and to overcome the limitations of the CNDDDB, because the CNDDDB is based on reports of actual occurrences and does not constitute an exhaustive inventory of every resource. See Appendix BIO for detailed species lists.

Listed Species

Federal, State, and local authorities under a variety of legislative acts share regulatory authority over biological resources. The CDFW has direct jurisdiction under law for biological resources through the State Fish and Game Code and under the CESA. The ESA also provides direct regulatory authority over specially designated organisms and their habitats to the USFWS. These acts specifically regulate listed, and candidate endangered and threatened species, which are defined as:

- **Endangered Species:** any species that is in danger of extinction throughout all or a significant portion of its range
- **Threatened Species:** any species that is likely to become an endangered species within the foreseeable future throughout all or a significant part of its range

Special-Status Plants

Based on the database and literature review, 69 special-status plant species are known to occur, or have potential to occur, in the City or the surrounding area. Several of these species are associated sensitive natural communities including Valley Oak Woodland or riparian zones. Table 1 in Appendix BIO lists these special-status plant species, their listing status, and their CRPR.

Special-status plants that are known or have potential to occur in the City and surrounding area can occupy a range of habitat types. Some are associated with chaparral, cismontane woodland, and broadleaved upland forests such as western leatherwood (*Dirca occidentalis*), Hillsborough

chocolate lily (*Fritillaria biflora* var. *ineziana*), accurate bush-mallow (*Malacothamnus arcuatus*), and woodland woollythreads (*Monolopia gracilens*). Others are associated with valley and foothill grasslands such as Franciscan onion (*Allium peninsulare* var. *franciscanum*), and Crystal springs lessingia (*Lessingia arachnoidea*). Most of the known special-status plant species occurrences are recorded in areas of open space including Waterdog Lake and Open Space and Hidden Canyon Park at the southwestern extent of the City. Additionally, some of the species listed are not currently known to be found within the City limits but are regionally occurring species that could occur in the surrounding area.

Special-Status Wildlife

Based on the database and literature review, 46 special-status wildlife species are known, or have potential, to occur within the City or surrounding area. Table 2 in Appendix BIO lists these special-status wildlife species, their listing status, and other status designations.

Special-status species are most likely to occur in undeveloped areas and open space areas. However, riparian areas that intersect urban development may also provide habitat and movement corridors for special-status species. Belmont and the surrounding area also provide habitat for avian wildlife, including several listed species and other special-status species. Several occurrences of Alameda song sparrow (*Melospiza melodia pusillula*) have been recorded within the City of Belmont. Additionally, western snowy plover (*Charadrius nivosus nivosus*), California Ridgway's rail (*Rallus obsoletus obsoletus*), and California black rail (*Laterallus jamaicensis coturniculus*) are known to nest along the Belmont Slough immediately outside of the City's boundary to the west.

Ponds, wetlands, streams, and riparian areas may provide habitat for aquatic and semi-aquatic amphibians and reptiles, including California red-legged frog, foothill yellow-legged frog (*Rana boylei*), and western pond turtle (*Emys marmorata*). Belmont Creek, the Belmont Slough, and the O'Neill Slough provide habitat for special-status fish species such as tidewater goby (*Eucyclogobius newberryi*), steelhead (*Oncorhynchus mykiss irideus* pop. 8), and green sturgeon. Additionally, several occurrences of the federally and State endangered San Francisco gartersnake (*Thamnophis sirtalis tetrataenia*) occur throughout the City of Belmont and in its immediate surroundings.

The O'Neill Slough at the northeastern extent of the City is comprised of Northern Coastal Salt Marsh and has been recorded to provide habitat for salt-marsh harvest mouse (*Reithrodontomys raviventris*), a federally and State endangered species. Additionally, special-status bats such as pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*) are State species of special concern and have potential to occur within Belmont. Pallid bats are found in grasslands, shrublands, woodlands, and forests, and may roost in trees or buildings. Townsend's big-eared bats are found in a wide variety of habitats and may roost in abandoned buildings or large trees.

e. Wildlife Movement Corridors

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats within the link do not necessarily need to be the same as the habitats that are being linked. Rather, the link merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically, habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending upon the species using a corridor, specific physical resources (such as rock outcroppings, vernal pools, or oak trees) may need to be located within the habitat link at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

Wildlife movement corridors can be both large and small scale. Essential Connectivity Areas (ECAs) are mapped in the report, *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010) and represent principal connections between Natural Landscape Blocks. ECAs are regions in which land conservation and management actions should be prioritized to maintain and enhance connectivity between areas of high ecological importance. ECAs are mapped based on coarse ecological condition indicators, rather than the needs of particular species and thus serve most of the species in each region. It is important to recognize that even areas outside of Natural Landscape Blocks and ECAs support important ecological values and should not be immediately discounted as lacking conservation value without further review.

Most of Belmont is developed and urbanized and does not provide for wildlife movement corridors. However, Belmont is located at the northern extent of an ECA that extends from the San Francisco Peninsula south to the Santa Cruz Mountain range. This ECA overlaps with the southwestern portion of the City and encompasses a large portion of open space extending to the Pacific Ocean. Small scale habitat corridors important to wildlife movement are also present within the City, many of which are not mapped as ECAs. These include Belmont Creek, Belmont Slough and O'Neill Slough, as well as other drainages and topographic features that facilitate movement, and contiguous areas of natural vegetation, including Water Dog Lake and Open Space and Hidden Canyon Park. Perennial streams such as Belmont Creek provide potential fish and other aquatic wildlife movement habitat.

4.3.2 Regulatory Setting

Federal, State, and local authorities under a variety of statutes and guidelines share regulatory authority over biological resources. The primary authority for general biological resources lies within the land use control and planning authority of local jurisdictions, which in this instance includes the City of Belmont and for areas outside City limits, the County of San Mateo. The CDFW is a trustee agency for biological resources throughout the State as defined in CEQA and also has direct jurisdiction under the California Fish and Game Code, which includes, but is not limited to, resources protected by the State of California under the CESA. In addition, the local Regional Water Quality Control Board (RWQCB) is a responsible agency for waters of the State. Below are summaries of the federal, State, and local regulations or guiding documents that could apply.

a. Federal Regulations

Endangered Species Act

Under the ESA, authorization is required to “take” a listed species. Take is defined under Section 3 of the ESA as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Under federal regulation (50 Code of Federal Regulations [CFR] Sections 17.3, 222.102); “harm” is further defined to include habitat modification or

degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. Section 7 of the federal Endangered Species Act outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat.

Section 7(a)(2) of the ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the ESA. Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan (HCP) that includes components to minimize and mitigate impacts associated with the take.

The USFWS and NMFS share responsibility and regulatory authority for implementing the ESA (7 United States Code [USC] Section 136, 16 USC Section 1531 et seq.).

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act provides that it is unlawful, except as permitted by regulations, “to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, [...] any migratory bird, or any part, nest, or egg of any such bird” (16 USC Section 703(a)). The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the Migratory Bird Treaty Act (16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act’s Eagle Permit Rule (50 CFR 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) regulates marine fisheries in U.S. federal waters. The Magnuson-Stevens Act was first passed in 1976 and was revised in 1996 and 2007. The purpose of the Magnuson-Stevens Act is to provide long-term biological and economic sustainability of U.S. marine fisheries.

The NMFS has regulatory authority for implementing the Magnuson-Stevens Act. The NMFS requires regional fishery management councils to develop Fisheries Management Plans (FMPs) specific to their regions, fisheries and fish stocks. For waters off the U.S. West Coast, the Pacific Fishery Management Council has developed four FMPs, which are implemented through fisheries regulations for coastal pelagic species, groundfish species, highly migratory species and salmon species. These FMPs also identify Essential Fish Habitat, which is broadly defined as those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity.

Section 10 of the River and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the USACE, for the construction of any structure in or over any navigable

water of the United States. Regulated activities include dredging or disposal of dredged materials, excavation, filling, rechannelization and construction of any structure or any other modification of a navigable water of the United States.

Clean Water Act

Under Section 404 of the Clean Water Act, the USACE, with USEPA oversight, has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other “waters of the United States” (WOTUS). Perennial and intermittent creeks are considered WOTUS if they are hydrologically connected to other jurisdictional waters. In achieving the goals of the Clean Water Act, the USACE seeks to avoid adverse impacts and offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional WOTUS would require a Section 404 permit from the USACE prior to the start of work. Typically, when a project involves impacts to WOTUS, the goal of no net loss of wetlands is met by compensatory mitigation; in general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE/EPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with Section 401 of the Clean Water Act, applicants for a Section 404 permit must obtain water quality certification from the SWRCB or appropriate RWQCB.

b. State Regulations

California Endangered Species Act

CESA (California Fish and Game Code Section 2050 et seq.) prohibits take of State-listed threatened and endangered species without a CDFW incidental take permit. Take under CESA is restricted to direct harm of a listed species and does not prohibit indirect harm by way of habitat modification.

Protection of fully protected species is described in California Fish and Game Code Sections 3511, 4700, 5050 and 5515. These statutes prohibit take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Communities Conservation Plan.

Natural Communities Conservation Planning Act

The Natural Communities Conservation Planning Act was established by the California Legislature, is directed by the CDFW, and is implemented by the State, as well as public and private partnerships to protect habitat in California. The Natural Communities Conservation Planning Act takes a regional approach to preserving habitat. A Natural Communities Conservation Plan (NCCP) identifies and provides for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity. Once an NCCP has been approved, CDFW may provide take authorization for all covered species, including fully protected species, Section 2835 of the California Fish and Game Code.

California Fish and Game Code Sections 3503, 3503.5 and 3511

California Fish and Game Code Sections 3503, 3503.5 and 3511 describe unlawful take, possession, or destruction of birds, nests and eggs. Fully protected birds (California Fish and Game Code Section 3511) may not be taken or possessed except under specific permit. Section 3503.5 protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (California Fish and Game Code Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the NPPA, the owner of land where a rare or endangered native plant is growing is required to notify the CDFW at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

Section 1600 et seq. of the California Fish and Game Code

Section 1600 et seq. of the California Fish and Game Code prohibits, without prior notification to CDFW, the substantial diversion or obstruction of the natural flow of, or substantial change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. In order for these activities to occur, the CDFW must receive written notification regarding the activity in the manner prescribed by the CDFW and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams and associated riparian vegetation, when present, are subject to this regulation.

Porter-Cologne Water Quality Control Act

Pursuant to Section 401 of the Clean Water Act, projects that apply for a USACE permit for discharge of dredge or fill material must also obtain water quality certification under Section 401 from the RWQCB. Additionally, the SWRCB and each of nine local RWQCBs have jurisdiction over “waters of the State” pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to “isolated” waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction). The local RWQCB implements this general order for isolated waters not subject to federal jurisdiction.

The Clean Water Act and associated federal regulations (Title 40 of the CFR 123.25(a)(9), 122.26(a), 122.26(b)(14)(x) and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges, and develop a Storm Water Pollution Prevention Plan (SWPPP). The NPDES Program is a federal program which has been delegated to the State of California for implementation through the SWRCB and RWQCBs.

c. Local Regulations

City of Belmont General Plan

On November 14, 2017 the City of Belmont adopted the 2035 General Plan. This General Plan contains the following policies related to biological resources:

Land Use Element

Policy 2.4-2: Maintain adequate and reasonable tree protection and removal standards and best management practices, implemented by the City's Tree Ordinance.

Policy 2.14-3: Create clear design standards for the interface between open spaces and neighborhoods, especially in the Urban/Wildland Interface Zone. Standards should identify the margin of open space needed to allow wildlife, recreation, and aesthetic values to flourish while also reducing threats of fire and invasive plant species. Incorporate "Defensible Space" standards as needed in areas of high wildfire risk.

Parks, Recreation and Open Space Element

Policy 4.4-1: Continue to designate and protect open space lands for the preservation of scenic areas, natural drainage ways, and plant and wildlife habitats; for outdoor recreation; and for public health and safety.

Policy 4.4-6: Develop programs to control invasive plant species that threaten the natural resources.

Policy 4.5-2: Protect Belmont Creek from future encroachment through regulation, development review, conservation easements, or other appropriate actions.

Policy 4.5-3: Continue to prohibit off-road motorized vehicle use in open space areas to prevent damage to the environment.

Policy 4.5-4: Seek to preserve the existing open space areas in the San Juan Hills and Western Hills, consistent with the Area Plans, especially on steep hillsides and sensitive habitat areas.

Conservation Element

Policy 5.1-1: Ensure that any improvements recommended for open space areas are appropriate for the type of open space and the use proposed.

Policy 5.1-2: In portions of Belmont that include significant open space resources, use area plans to address the balance and interface between natural and developed areas.

Policy 5.1-3: Reduce risk of wildland fire, ecological succession, and pathogen threats (such as Sudden Oak Death) through active maintenance of public spaces and education and enforcement of development standards on private property.

Policy 5.1-4: Ensure that future acquisitions of open space land are compatible with the City's open space strategy and long-term interests.

Policy 5.3-1: Support the protection, preservation, restoration, and enhancement of habitats of State or federally listed rare, threatened, endangered and/or other sensitive and special-status species, and favor enhancement of contiguous areas over small, segmented remainder parcels.

Policy 5.3-2: Continue to maintain, protect, restore, and enhance Belmont's ecologically important areas and seek to reduce impacts on them, including the creek corridors, the open space, and the wetlands around O'Neill Slough.

Policy 5.3-3: To the greatest extent feasible, ensure that development does not disturb sensitive habitat and special-status species by requiring appropriate and feasible mitigation measures.

Policy 5.3-4: Maintain functional wildlife corridors and habitat linkage in order to contribute to regional biodiversity and the viability of rare, unique or sensitive biological resources throughout the City and region.

Policy 5.4-3: Protect, restore, and enhance a continuous corridor of native riparian vegetation and wildlife habitat along Belmont’s waterways, water bodies, and wetlands.

Belmont Village Specific Plan

The BVSP was adopted to realize the community’s vision of an attractive, mixed use, and vibrant downtown. BVSP Chapter 6 provides an overview of water resources, flooding, habitat, and wildlife issues within the BVSP Planning Area. The BVSP Planning Area is bounded by Wessex Way, Hiller Street and the City limits on the east, and Sixth Avenue from Broadway Street to Hill Street and Middle Road on the west. The BVSP contains the following policies related to biological resources:

Policy 6.1-1: Design storm drainage and flood control structures to minimize erosion and creek sedimentation and to preserve and enhance the wildlife habitat and vegetation of Belmont Creek.

Policy 6.2-2: Continue to collaborate on and implement efforts to restore Belmont Creek and enhance ecological functions, biological resources, hydrology function, and flood control.

Policy 6.3-1: Ensure that development does not disturb sensitive habitat and special-status species by requiring appropriate and feasible mitigation measures. If Endangered or Threatened Species are discovered prior to or during construction of a development project, require project proponents to consult a qualified biologist for proper action and to develop adequate measures to avoid or mitigate impacts.

Policy 6.3-2: Maintain the Belmont Creek corridor west of Sixth Avenue as a functional wildlife corridor and habitat linkage. Provide an appropriate buffer, using landscaping, to preserve and protect the creek water quality. Where feasible, allow public access in the form of open space or a multi-use trail along the creek corridor. Incorporate interpretive signage for educational purposes in public access areas along the creek and in Twin Pines Park.

City of Belmont Municipal Code

Chapter 9, Article IV, Section 9-44, *Protected Trees*, of the City of Belmont Municipal Code (BMC) was developed to preserve protected trees whenever possible. This section states that protected trees shall be protected from damage during grading per the City’s standard details and any required arborist recommendations. BMC Chapter 25, Section 25-5, *Tree removal permit requirement*, states that it is unlawful to remove a protected tree without a permit issued in accordance with Chapter 25. The term “protected tree” is described in Chapter 25, Trees of the BMC as:

- a Principal Native Tree having a single main stem or trunk of 10 inches or more diameter at breast height (DBH), or up to three of the largest secondary stems totaling 10 inches or more DBH of the following species:
 - Coast Live Oak,
 - Valley Oak,
 - Redwood,
 - Madrone,

- Bay Laurel, or
- a City Tree,
- a Replacement Tree,
- a Right-of-Way Tree, or
- a Large Diameter Tree, defined as a woody, perennial plant characterized by having a single main stem or trunk of 14 inches or more DBH, or up to three of the largest secondary stems totaling 18 inches or more DBH.

4.3.3 Impact Analysis

a. Methodology

Environmental impacts to biological resources have been assessed using impact significance criteria from federal, State, and local regulations. CEQA, Chapter 1, Section 21001 (c) states that it is the policy of the State of California to “prevent the elimination of fish and wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities.”

Environmental impacts relative to biological resources have been assessed using impact significance criteria encompassing *CEQA Guidelines* and federal, State and local plans, regulations, and ordinances.

The impact analysis is based on available literature regarding the existing biological resources in Belmont. Data used for this analysis are summarized in Section 4.3.1.

b. Significance Thresholds

The following threshold criteria, as defined by the *CEQA Guidelines* Appendix G Checklist, were used to evaluate potential environmental effects. Based on these criteria, the proposed project would have a significant effect on biological resources if it would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service
3. Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan

c. Project Impacts and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-1 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR VEGETATION REMOVAL; THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATIONS, ON A SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL-STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS, OR BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE OR U.S. FISH AND WILDLIFE SERVICE. THERE WOULD BE NO IMPACT.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the sites are currently designated for open space, recreation, resource management, flood control or habitat. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance, vegetation removal, or development in areas where such activities are currently prohibited. The rezoning which would occur as part of the project could change the maximum height allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*; however, this would not have a significant impact on biological resources because the area of potential disturbance would not change. In addition, as discussed in Section 4.3.2, *Regulatory Setting*, a number of federal, State and local regulations protect critical habitat and protected species from development, including the State and federal Endangered Species Acts, Migratory Bird Treaty Act, Magnuson-Stevens Fishery Conservation and Management Act, River and Harbors Act, Clean Water Act, Natural Community Conservation Planning Act, California Fish and Game Code, Native Plant Protection Act, Porter-Cologne Water Quality Control Act, and numerous City of Belmont General Plan polices. These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development that could affect species identified as a candidate, sensitive, or special-status species, no impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-2 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON RIPARIAN HABITAT OR SENSITIVE NATURAL COMMUNITIES. THERE WOULD BE NO IMPACT.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the sites are currently designated for open space, recreation, resource management, flood control or habitat. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance, vegetation removal, or development in areas where such activities are currently prohibited. The rezoning which would occur as part of the project could change the maximum height allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*; however, this would not have a significant impact on biological resources because the area of potential disturbance would not change. In addition, as discussed in Section 4.3.2, *Regulatory Setting*, a number of federal, State and local regulations protect riparian habitat or sensitive natural communities from development, including the State and federal Endangered Species Acts, Migratory Bird Treaty Act, Magnuson-Stevens Fishery Conservation and Management Act, River and Harbors Act, Clean Water Act, Natural Community Conservation Planning Act, California Fish and Game Code, Native Plant Protection Act, Porter-Cologne Water Quality Control Act, and numerous City of Belmont General Plan policies. For example, Belmont General Plan Policy 4.5-2 protects Belmont Creek from encroachment; Policy 5.3-2 requires the City to ensure that development does not disturb sensitive habitat and special status species, including the creek corridors; and Policy 5.4-3 requires the City to protect wildlife habitat along Belmont's waterways. These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development that could affect riparian habitat or sensitive natural communities, no impact would occur.

With implementation of these General Plan policies, as well as compliance with federal, State, and local regulations, the impact of the development facilitated by the project to riparian or sensitive natural communities would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3: Would the project have a substantial adverse effect on State or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-3 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON JURISDICTIONAL STATE OR FEDERALLY PROTECTED WETLANDS. THERE WOULD BE NO IMPACT.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the sites are currently designated for open space, recreation, resource management, flood control or habitat. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow ground disturbance or development within or in proximity to State or federally protected wetlands. The rezoning which would occur as part of the project could change the maximum height allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*; however, this would not have a significant impact on biological resources because the area of potential disturbance would not change. In addition, as discussed in Section 4.3.2, *Regulatory Setting*, a number of federal, State and local regulations protect wetlands from adverse effects from development, including the Clean Water Act and numerous City of Belmont General Plan policies. For example, Belmont General Plan Policy 5.3-2 involves maintenance and protection of ecologically important areas including wetlands around O'Neill Slough and Policy 5.4-3 involves protection and restoration of native vegetation and wildlife habitat along waterways, water bodies, and wetlands. These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development that could affect wetlands, no impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact BIO-4 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THE PROJECT WOULD NOT HAVE AN IMPACT ON WILDLIFE MOVEMENT.

Most Draft Housing Opportunity Sites are located in developed areas of the City that do not function as a corridor for wildlife movement, and as discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. The rezoning which would occur as part of the project could change the maximum height allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*; however, this would not have a significant impact on biological resources because the area of potential disturbance would not change. Development facilitated by the project would be required to comply

with existing City standards and processes, including General Plan Policies 5.3-2, 5.3-4 and 5.4-3 to protect and maintain functional wildlife corridors and habitat linkages throughout the City and region. Considering that the project would not facilitate development in open space areas, including riparian and stream corridors, and that development would be required to comply with General Plan policies to protect and enhance local movement corridors available in open space, there would be no impact.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT, AND DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE SUBJECT TO THE CITY'S ORDINANCES AND REQUIREMENTS PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. The rezoning which would occur as part of the project could change the maximum height allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*; however, this would not have a significant impact on biological resources because the area of potential disturbance would not change. Development facilitated by the project could require some tree removal, which would be determined during the project's design and application process. However, development facilitated by the project would be required to comply with General Plan goals and policies for tree protection as well as BMC Sections 9-44 and 25-5 requiring applications for tree removal permits and compliance with associated measures (e.g., tree replacement) where applicable. Compliance with these regulations would reduce impacts to less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Impact BIO-6 **THERE ARE NO HABITAT CONSERVATION PLANS OR NATURAL COMMUNITY CONSERVATION PLANS APPLICABLE TO THE DRAFT HOUSING OPPORTUNITY SITES. THEREFORE, DEVELOPMENT FACILITATED BY THE PROJECT WOULD HAVE NO IMPACT.**

There are no adopted HCPs or NCCPs within the City limits (CDFW 2021c; USFWS 2021d). Therefore, there are no habitat conservation plans or natural community conservation plans applicable to the Draft Housing Opportunity Sites. Development facilitated by the project would have no impacts related to conflicts with an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.3.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative biological resources impacts includes the areas surrounding the Draft Housing Opportunity Sites, including most of the City of Belmont. This geographic scope is appropriate for biological resources because it encompasses the mosaic of representative land cover and habitat types (and associated biological resources) affected by the project, including primarily urban, residential, commercial, and industrial development with areas of natural habitats. Development that is considered part of the cumulative analysis includes buildout of the City General Plan.

Cumulative development in the area could contribute to the loss of habitat for special-status species; contribute to the decline of special-status species; cause further fragmentation of habitat and isolation of populations; and decrease movement opportunities. Together, cumulative projects (both development facilitated by the project and full buildout of the City General Plan) cover a substantial area, primarily within or along the edges of previously developed areas. Cumulative impacts to biological resources would be potentially significant.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. The rezoning which would occur under the project could change the maximum height allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*; however, this would not have a significant impact on biological resources because the area of potential disturbance would not change. As the project would not increase the likelihood for development that could affect species identified as a candidate, sensitive, or special-status species, no impact would occur and therefore the project would not have a cumulatively considerable contribution to the significant cumulative impact related to sensitive or special-status species.

Similarly, relevant policies and regulations would apply to development in Belmont and provide the same level of protection as under existing conditions. The project would not increase the likelihood for development that could affect riparian habitat or sensitive natural communities, the project would not have a cumulatively considerable contribution to the significant cumulative impact related to these resources.

The project would not impact the movement of any native resident or migratory fish or wildlife species, or impede the use of wildlife nursery sites, as discussed under Impact BIO-4. Development facilitated by the project would be required to comply with tree protection ordinances and requirements, as discussed under Impact BIO-5. Lastly, as discussed under Impact BIO-6, there are no HCPs or NCCPs applicable to the project. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to these resources.

4.4 Cultural Resources

This section addresses impacts to cultural resources, including archaeological and historical resources, associated with the implementation of the proposed project.

4.4.1 Setting

The City of Belmont lies within the San Francisco Bay Area archaeological region (Milliken et al. 2007, Moratto 1984). Milliken et al. (2007) generally divided the prehistoric chronology of the Bay Area into five periods: The Early Holocene (8,000-3,500 Before Common Era [BCE]), Early Period (3,500-500 BCE), Lower Middle Period (500 BCE to 430 Common Era [CE]), the Upper Middle Period (430-1050 CE), and the Late Period (1050 CE-contact).

a. Cultural Setting

It is presumed that early Paleoindian groups lived in the area prior to 8,000 BCE; however, no evidence for that period has been discovered in the Bay Area to date (Milliken et al. 2007). Sites dating to this period may be submerged or deeply buried as a result of rising sea levels and widespread sediment deposition that has occurred since the Terminal Pleistocene Period (Byrd et al. 2017). For this reason, the Terminal Pleistocene Period (ca. 11,700-8,000 BCE) is not discussed here.

The earliest intensive study of archaeology of the San Francisco Bay Area began with N. C. Nelson of the University of California, Berkeley, between 1906 and 1908. He documented over 400 shell mounds throughout the area. Nelson was the first to identify the Bay Area as a discrete archaeological region (Moratto 1984).

Early Holocene (8000-3500 BCE)

Archaeological evidence from the early Holocene is limited as many sites dating to this period are likely buried under Holocene alluvial deposits (Moratto 1984; Ragir 1972). The available data suggest that the Early Holocene in the San Francisco Bay Area is characterized by a mobile forager pattern and the presence of millingslabs, handstones, and a variety of leaf-shaped projectile points. Two archaeological sites (CA-CCO-696 and CA-CCO-637) that date to this period have been identified in Contra Costa County at the Los Vaqueros Reservoir. The earliest date for the Early Holocene comes from the CA-CCO-696, approximately 7000 BCE (Milliken et al. 2007).

Early Period (3500-600 BCE)

The Early Period saw increased sedentism with the introduction of new ground stone technologies (i.e., mortar and pestle), an increase in regional trade, and the first cut shell beads. The earliest evidence for the use of the mortar and pestle dates to 3800 BCE and comes from CA-CCO-637. By 1500 BCE, mortars and pestles had almost completely replaced millingslabs and handstones. The advent of the mortar and pestle indicates a greater reliance on processing nuts, especially acorns. Faunal evidence from various sites indicates a diverse faunal exploitation pattern based on mussel and other shellfish, marine mammals, terrestrial mammals, and birds (D'Oro 2009).

The earliest cut bead horizon is also associated with this period. Rectangular *Haliotis* spp. (abalone) and *Olivella* spp. (snail) beads have been identified at several Early Period sites, including CA-CCO-637, CA-SCL-832 in Sunnyvale, and CA-ALA-307 in Berkeley (Milliken et al. 2007). These early examples of cut beads were recovered from mortuary contexts.

Lower Middle Period (500 BCE-CE 430)

The Lower Middle Period saw numerous changes from the previous period. The presence of chipped stone points and bone tools became typical. Rectangular shell beads, common during the Early Period, disappear completely and are replaced by split-beveled and saucer *Olivella* beads. In addition to the changes in beads, *Haliotis* spp. ornaments, bone tools and ornaments, and basketry awls also became typical, indicating the development of coiled basketry technology. Mortars and pestles continued to be the dominant grinding tool (Luby and Gruber 1999, Milliken et al. 2007).

Evidence for the Lower Middle Period in the Bay Area comes from sites such as the Emeryville shell mound (CA-ALA-309) and Ellis Landing (CA-CCO-295). CA-ALA-309 is one of the largest shell mounds in the Bay Area and contains multiple cultural sequences. The lower levels of the site, which date to the Middle Period, contain flexed burials with bone implements, chert bifaces, charmstones, and oyster shells (Moratto 1984).

Upper Middle Period (430-1050 CE)

Around 430 CE, *Olivella* saucer bead trade networks that had been established during earlier periods collapsed and over half of known sites occupied during the Lower Middle Period were abandoned. *Olivella* saucer beads were replaced with *Olivella* saddle beads. New types of material culture appear within these sites, including elaborate, decorative blades, fishtail charmstones, new *Haliotis* ornament forms, and mica ornaments. Sea otter bones became more abundant, while salmon and other fish became less abundant, suggesting changes in faunal exploitation patterns from earlier periods (Milliken et al. 2007, Simons and Carpenter 2009). Excavations at CA-ALA-309 indicate that a shift from mussels to oysters to clams may have occurred (Gifford 1916), and isotopic analysis confirms that San Francisco Bay individuals shifted from hunting higher-trophic-level foods in the Early Period to gathering foods like plants and shellfish in the Middle and Upper Periods (Burns et al. 2012). Subsistence analyses at various sites dating to this period indicate a diverse diet that included numerous species of fish, mammals, birds, shellfish, and plant resources that varied by location in the Bay Area (Hylkema 2002).

Late Period (CE 1050-contact)

The Late Period saw an increase in social complexity, indicated by differences in burials and an increased level of sedentism relative to preceding periods, as evidenced by mortars weighing up to 90.7 kg (Lentz 2012:198). An increase in imported Napa Valley obsidian occurred during this time for the production of smaller points, preforms and simple flake tools. Small, finely worked projectile points of the Stockton Serrated series associated with bow and arrow technology appear around 1250 CE. *Olivella* shell beads disappeared and were replaced with *Olivella* lipped and spire-lopped beads in the south bay and clamshell disk beads in the north bay, where thicker and larger beads indicated higher affluence. The toggle harpoon, hopper mortar, and magnesite tube beads also appeared during this period (Milliken et al. 2007, Lentz 2012, Von Der Porten et al. 2014). This period saw an increase in the intensity of resource exploitation that correlates with an increase in population (Moratto 1984). Many of the well-known sites of earlier periods, such as the Emeryville shell mound (CA-ALA-309) and the West Berkeley site (CA-ALA-307), were abandoned, as indicated by the lack of Late Period elements. Researchers have suggested that the abandonment of these sites may have resulted from fluctuating climates and drought that occurred throughout the Late Period (Lightfoot and Luby 2002).

b. Historic Setting

Post-contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769 – 1822)

Spanish explorers made sailing expeditions along the coast of what was then known as Alta (upper) California between the mid-1500s and mid-1700s. In 1542, while in search of the legendary Northwest Passage, Juan Rodríguez Cabrillo recorded a visit to the Santa Barbara area. Sebastian Vizcaíno also conducted exploration of the coast in 1602 and named the Santa Barbara Channel when his ship entered it on the feast day of Saint Barbara (Kyle 2002). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885, Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823. The Santa Barbara presidio was established in 1782, and the Santa Barbara Mission was founded 4 years later (Graffy 2010).

The mission and presidio relied on Chumash labor; eventually, most of the native population lived at the mission complex (Cole 1999). Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish King (Livingston 1914).

Mexican Period (1822 – 1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Dallas 1955).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land. (Graffy 2010).

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848 – Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton, and evaded Californian soldiers in Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as US territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

City of Belmont

In the nineteenth century, the area that now comprises the City of Belmont was part of Rancho Las Pulgas, a 35,000-acre cattle ranch granted to Luis Antonio Arguello in 1825. As was often the case in California after the Gold Rush, the Arguello family faced challenges to their ownership of the rancho. Although the Arguello family successfully defended the title to their rancho before the United States Supreme Court mounting legal bills forced the Arguellos to sell sections of their land to pay attorney's fees. Simon Mezes, a San Francisco-based lawyer and land developer, thus acquired a 5,000-acre portion of Rancho de Pulgas, and in 1853, built a home on the tract. Mezes sold a piece of the land to his associate Leonetto Cipriani, who built an estate there before returning to his native Italy in 1864 (Belmont Chamber of Commerce 2021).

It was on land sold by the Arguellos that the nucleus of what would become Belmont was formed in 1850. That year, Charles Angelo established a roadhouse near the intersection of El Camino Real (the main road between San Francisco and San José) and the old road to the coast. That intersection, known locally as “the Corners,” soon grew into the incipient community’s main commercial center. The growth of nearby Redwood City and increasing traffic on El Camino Real led to new settlement in Belmont. In 1856, the town became part of the newly established San Mateo County, which was formed from the southern portion of San Francisco County’s original boundaries. In 1864, the railroad arrived giving further impetus to Belmont’s development. That same year, one of the town’s most famed residents, railroad financier William Ralston, arrived in Belmont and built his “spectacular country villa” Ralston Hall. Ralston died in 1875, and the property changed hands several times until 1923, when it was converted to the Catholic women’s school that eventually became Notre Dame de Namur University. Turn-of-the-century development centered on “the Corners,” where the Janke family built new hotel and a sarsaparilla factory (the Belmont Soda Works) in the 1880s. In 1909, Walter Emmett opened a livery stable, saloon, and other commercial enterprises (Belmont Chamber of Commerce 2021).

Developments in the twentieth century fostered Belmont’s maturation from a rural town to a suburban community. In the 1920s, the rise of the automobile and construction of the San Mateo and Dumbarton bridges spanning the San Francisco Bay led to a boom in Belmont and, more broadly, San Mateo County. Upgrades to the Bayshore Highway improved the community’s connections to the Bay Area region, and Belmont’s development began to take on its current suburban character. The growing community incorporated in 1926. In 1940, the city’s population totaled 1,200. The growth of the Bay Area in during World War II and the immediate postwar era pushed the county to 5,000 by 1950. Through the 1950s and 1960s, Belmont emerged as a well-heeled bedroom community (Belmont Chamber of Commerce 2021, City of Belmont 2017). Post-World War II-era growth pushed the city’s population to 23,000 in 1970. The population has remained somewhat stable since then; as of 2021, the population is estimated to be 26,470 persons as detailed in Section 4.12, *Population and Housing*.

c. Existing Conditions

Due to the programmatic nature of this EIR, to identify known historical resources located in the city of Belmont, background research included the consultation of the following sources: the NRHP, CRHR, Office of Historic Preservation Built Environment Resource Directory, the 1991 City of Belmont Historical Resources Inventory, and the 2017 Draft EIR prepared for the City of Belmont 2035 General Plan. In addition, the Belmont Historical Society was consulted for knowledge of historical resources located within the city. A desktop review prepared in support of the current project indicates that several properties identified in the General Plan Draft EIR (2017) are no longer extant or do not meet the definition of a historical resource pursuant to *CEQA Guidelines* Section 15064.6 ; these properties have therefore been removed from the inventory presented below. As a result of this background research 46 historical resources and historic district contributors were identified that are designated, or recommended eligible for designation, at the national, state, and/or local level. There are also two locally eligible historic districts in Belmont: Belburn Village Historic District, which spans a two-block area along Belburn Drive and Avon Street; and the Waltermire Historic District, which includes roughly two blocks bounded by El Camino Real, Sixth Avenue, Waltermire Street, and O’Neill Avenue. Table 4.4-1 lists the extant individual historical resources and district contributors, and the locations of known historical resources relative to the Draft Housing Opportunity Sites is depicted in Figure 4.4-1. None of the known historical resources are located within the 144 Draft Housing Opportunity Sites, with the exception of a portion of Draft

Housing Opportunity Site No. 61, which is located within the boundaries of the Waltermire Historic District. However, a mixed-use project at this location is underway as of the drafting of this EIR and was already subject to federal environmental compliance by the County of San Mateo Department of Housing (County of San Mateo Department of Housing 2020). Therefore, it is not anticipated any additional impacts would occur beyond those already analyzed.

Table 4.4-1 Known Historical Resources

Address	Year Built	Designation ¹
600 Alameda de las Pulgas	N/A	Designated locally as a Historic Resource
709 Alameda de las Pulgas	1925	Recommended eligible for NRHP listing
751 Alameda de las Pulgas	N/A	Designated locally as a Landmark
790 Alameda de las Pulgas	N/A	Designated locally as a Landmark
838 Alameda de las Pulgas	N/A	Designated locally as a Historic Resource
1060 Alameda de las Pulgas	1920	Designated locally as a Historic Resource and Landmark; recommended eligible for NRHP listing
903 Avon St.	1927	Designated locally as a Historic Resource and historic district contributor
904 Avon St.	1927	Designated locally as a Historic Resource and historic district contributor
909 Avon St.	1927	Designated locally as a Historic Resource and historic district contributor
910 Avon St.	1927	Designated locally as a Historic Resource and historic district contributor
913 Avon St.	1927	Designated locally as a Historic Resource and historic district contributor
1617 Belburn Dr.	1928	Designated locally as a Historic Resource and historic district contributor
1703 Belburn Dr.	1927	Designated locally as a Historic Resource and historic district contributor
1705 Belburn Dr.	1927	Designated locally as a Historic Resource and historic district contributor
1789 Belburn Dr.	1927	Designated locally as a Historic Resource and historic district contributor
1801 Belburn Dr.	1927	Designated locally as a Historic Resource and historic district contributor
1803 Belburn Dr.	1927	Designated locally as a Historic Resource and historic district contributor
2200 Carlmont Dr.	N/A	Designated locally as a Landmark
1 Davey Glen Rd.	1890	Designated locally as a Landmark; recommended eligible for the NRHP
730 El Camino Real	N/A	Designated locally as a Historic Resource
1426-28 El Camino Real	N/A	Designated locally as a Historic Resource
1300 Fifth Ave.	N/A	Designated locally as a Landmark
1602 Francis Ave.	N/A	Designated locally as a Historic Resource
525 Kingston Rd.	N/A	Designated locally as a Historic Resource
600 Kingston Rd.	1927	Designated locally as a Landmark; recommended eligible for the NRHP
2351 Lyall Way	N/A	Designated locally as a Historic Resource
2020 Mezes Ave.	N/A	Designated locally as a Historic Resource
588 Middle Rd.	N/A	Designated locally as a Historic Resource
1110 Old County Rd.	N/A	Designated locally as a Historic Resource
900 O'Neill Ave.	1928	Designated locally as a Historic Resource and a historic district contributor
843 Ralston Ave. ¹	N/A	Designated locally as a Landmark
1085 Ralston Ave.	1907	Designated locally as a Landmark; recommended eligible for the NRHP

Address	Year Built	Designation ¹
1403 Ralston Ave.	N/A	Designated locally as a Historic Resource
1500 Ralston Ave. (3 Sites) ²	1864	Listed on the NRHP; designated locally as a Landmark
1201 Sixth Ave.	1928	Designated locally as a Historic Resource
1235 Sixth Ave.	1900	Designated locally as a Historic Resource
1265 Sixth Ave.	1905	Designated locally as a Historic Resource and historic district contributor
1441 Sixth Ave.	N/A	Designated locally as a Historic Resource
1457 Sixth Ave.	N/A	Designated locally as a Historic Resource
1556 Sixth Ave.	1925	Recommended eligible for the NRHP
857 South Rd.	1907	Designated locally as a Landmark; recommended eligible for the NRHP
1441 Sunnyslope Ave.	N/A	Designated locally as a Historic Resource
901 Waltermire St.	1905	Designated locally as a Historic Resource and historic district contributor
925 Waltermire St.	1924	Designated locally as a Historic Resource and historic district contributor
935 Waltermire St.	1920	Designated locally as a Historic Resource and historic district contributor
955 Waltermire St.	1928	Designated locally as a Historic Resource and historic district contributor

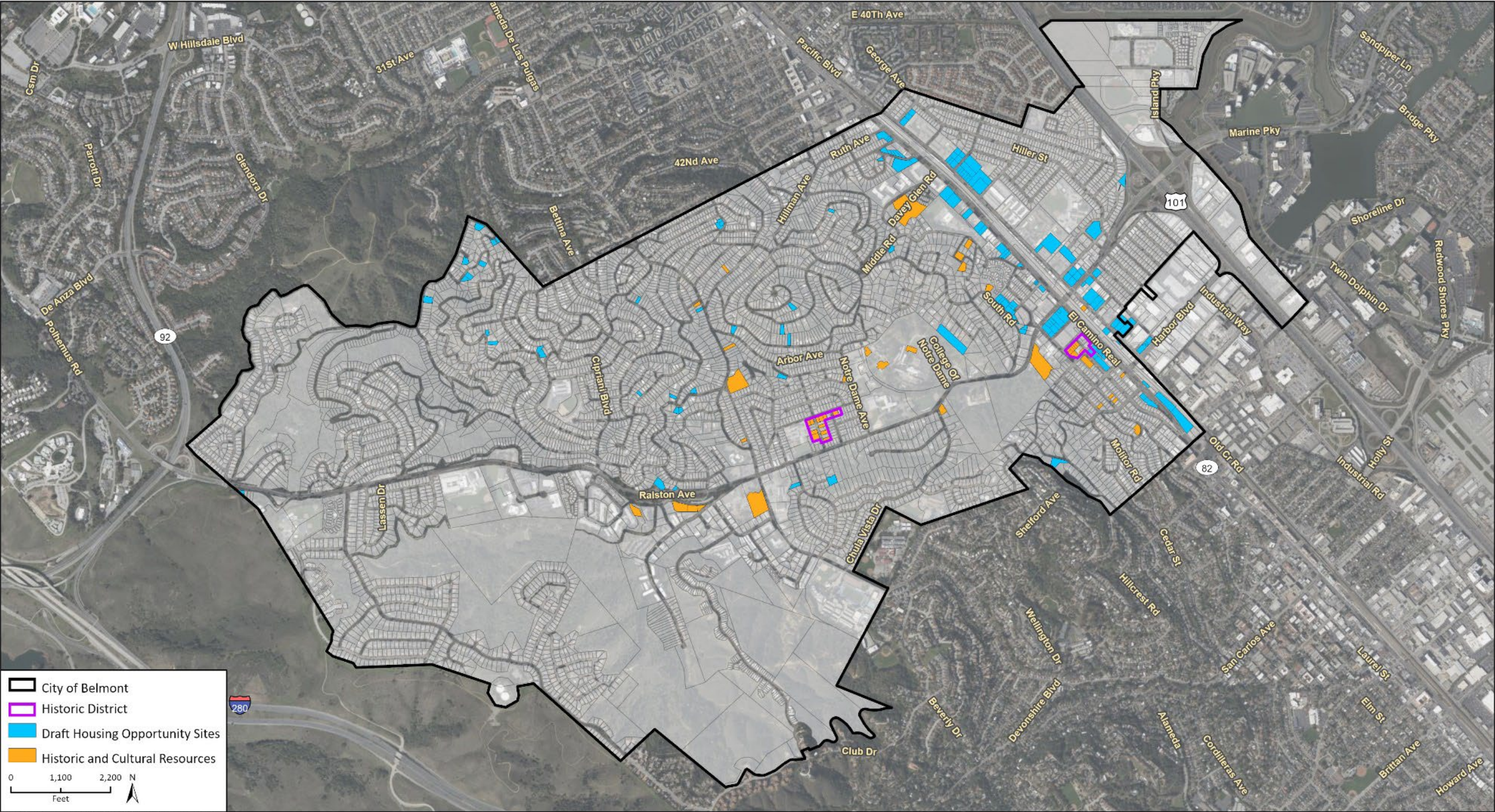
¹ This is the former address of the Emmett House, which was moved in 2008 from its original location at 843 Ralston Avenue to its present location at 1000 O'Neill Avenue.

² This property includes Ralston Hall, Chapel/Conference Center, Carriage House/Art Center.

Sources: NRHP; CRHR; California Built Environment Directory; City of Belmont 2017.

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Figure 4.4-1 Location of Known Historical Resources and Draft Housing Opportunity Sites



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Additional data provided by City of Belmont, 2014

20-10377 Belmont, Minnet Haug
Fig. 4 Cultural Resources

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According to guidance from the California Office of Historic Preservation, built environment features over 45 years of age maybe considered for federal, state and/or local designation (California Office of Historic Preservation 1995). The San Mateo County Assessor does not provide construction dates for properties within San Mateo County; however, a review of historical aerial imagery does confirm there are several Draft Housing Opportunity Sites that contain buildings over 45 years old.

Table 4.4-2 lists those sites that contain historic-age buildings and/or structures.

Table 4.4-2 Draft Housing Opportunity Sites with Buildings or Structures Older than 45 Years of Age

Draft Housing Opportunity Site No.	Address	Assessor Parcel #	Date Range of Existing Buildings/Structures
1	503 Dale View Avenue	40246270	circa 1956-1968
2	505 Dale View Avenue	40246280	circa 1956-1968
3	201 Old County Road	40246290	circa 1956-1968
4	210 El Camino Real	44152100	circa 1956-1968
5	640 Masonic Way	40312180	circa 1956-1968
6	230 El Camino Real	44152110	circa 1946-1956
7	614 Mountain View Avenue	40261390	circa 1956-1968
8	240 El Camino Real	44152120	circa 1956-1968
9	516 El Camino Real	44201040	circa 1956-1968
11	610 Mountain View Avenue	40261380	circa 1946-1956
12	803 Belmont Avenue	44172190	circa 1946-1956
13	604 Mountain View Ave	40261190	circa 1946-1956
14	319 Old County Road	40261340	circa 1956-1968
15	319 Old County Road	40261330	circa 1956-1968
16	513 Mountain View Ave	40263460	circa 1946-1956
17	620 Mountain View Avenue	40261200	circa 1956-1968
22	425 Old County Road	40263350	circa 1968-1980
24	415 Old County Road	40263370	circa 1968-1980
26	510 El Camino Real	44201180	circa 1956-1968
29	580 Masonic Way	40315010	circa 1946-1956
30	500 El Camino Real	44201280	circa 1956-1968
31	564 El Camino Real	44201270	circa 1956-1968
32	325 Old County Road	40261400	circa 1956-1968
33	700 El Camino Real	44222120	circa 1956-1968
34	720 El Camino Real	44222130	circa 1956-1968
35	690 El Camino Real	44222210	circa 1956-1968
37	600 Ralston Avenue	40313270	circa 1956-1968
39	601 Ralston Avenue	40332220	circa 1956-1968
47	884 El Camino Real	45162080	circa 1968-1980
48	898 El Camino Real	45162090	circa 1968-1980
49	641 Ralston Avenue	40332250	circa 1968-1980
50	876 El Camino Real	45162070	circa 1968-1980

Draft Housing Opportunity Site No.	Address	Assessor Parcel #	Date Range of Existing Buildings/Structures
51	900 El Camino Real	45163070	circa 1968-1980
53	1161 Old County Road	40332110	circa 1956-1968
55	N/A	45182020	circa 1968-1980
56	N/A	45182040	circa 1968-1980
58	N/A	45244170	circa 1946-1956
59	N/A	45182010	circa 1946-1956
62	1328 El Camino Real	45244050	circa 1946-1956
63	N/A	45244020	circa 1946-1956
64	N/A	45244070	circa 1946-1956
67	1324 Old County Road	45241230	circa 1946-1956
68	N/A	45244030	circa 1946-1956
69	N/A	45244040	circa 1946-1956
70	N/A	45244060	circa 1946-1956
71	N/A	45244150	circa 1946-1956
73	1324 Old County Road	45241240	circa 1956-1968
77	1538 El Camino Real	45253290	circa 1968-1980
78	1601 El Camino Real	45252100	circa 1968-1980
87	516 El Camino Real	44201170	circa 1956-1968

4.4.2 Regulatory Setting

This section includes a discussion of the applicable federal, state, and local laws, ordinances, regulations, and standards governing cultural resources.

California Environmental Quality Act

CEQA requires that a lead agency determine whether a project could have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1), unique archaeological resources (PRC Section 21083.2 [g]), and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (Section 21084.1), a resource included in a local register of historical resources (Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (Section 15064.5[a][3]).

PRC Section 5024.1 requires an evaluation of historic-period resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historic-period resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, as enumerated according to CEQA and quoted below.

15064.5(a)(3) [...] Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical

Resources (PRC, Section 5024.1, Title 14 California Code of Regulations, Section 4852) including the following:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- (2) Is associated with the lives of persons important in our past
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- (4) Has yielded, or may be likely to yield, information important in prehistory or history

15064.5(a)(4) The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the PRC), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC sections 5020.1(j) or 5024.1.

15064.5(b) A project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.

In addition, if a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (*CEQA Guidelines* Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (*CEQA Guidelines* Section 15064.5[b][2][A]).

Codes Governing Human Remains

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the Coroner to be Native American, the Coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, shall immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment of the remains and associated grave goods.

Senate Bill 35 and Assembly Bill 168

Individual projects defined by the General Plan Update may qualify for the ministerial approval process as defined by Senate Bill 35 (SB 35), codified in Government Code Section 65913.41 enacted on September 29, 2017, which expedites and facilitates construction of affordable housing. If so, they are also subject to Assembly Bill 168 (AB 168), an act to amend Sections 65400, 65913.4, and 65941.1 of SB 35, enacted in January 2021. AB 168 requires a pre-consultation process with Native American Tribes to identify and protect Tribal cultural resources prior to the submission of an SB 35 permit for a housing development project.

Belmont City Code Section 7-184 provides requirements for certain projects that propose to alter, relocate, or demolish any landmark or historic resource classified by resolution of the City Council.

National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

- Criterion A:** Is associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B:** Is associated with the lives of persons significant in our past
- Criterion C:** Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
- Criterion D:** Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

Location:	The place where the historic property was constructed or the place where the historic event occurred
Design:	The combination of elements that create the form, plan, space, structure, and style of a property
Setting:	The physical environment of a historic property
Materials:	The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property
Workmanship:	The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory
Feeling:	A property's expression of the aesthetic or historic sense of a particular period of time
Association:	The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

Local Regulations

City of Belmont Structures of Historic or Aesthetic Value

Adopted by ordinance on August 25, 1992, Chapter 7, Article VII of the City of Belmont Municipal Code pertains to the preservation buildings and structures of historic or aesthetic value. Its purpose is to preserve, enhance, and perpetuate for the benefit of the general public those buildings, structures, and areas having special historical or aesthetic interest or value which contribute to community aesthetics and identity, and to prescribe the procedure for altering, relocating, and demolishing those structures so classified.

Section 7-181 states that the City Council may, following a public hearing and notification of the subject property owners, by resolution classify a property as a landmark or historic resource. A landmark is defined as building or structure being the first, last, only or most significant of a type in a region, over 50 years old, possessing tangible elements of important historical periods, persons, architecture, or use. A historic resource is defined as a building or structure over 50 years old representative of a historic period or building type but does not meet landmark standards. A historic resource is significant because it was present during the period of significance, and possesses historic integrity, architecture, or historic association reflecting its character at that time or is capable of yielding important information about the period.

Sections 7-187 through 7-189 prescribe the procedures for altering, relocating, and demolishing a landmark or historic resource.

FINDINGS FOR ALTERATION OF LANDMARKS AND HISTORIC RESOURCES

- (a) **Landmark.** A certificate of appropriateness for the alteration of a classified landmark shall be granted by the hearing body upon finding that the proposed alteration retains the original exterior appearance of the landmark and its immediate setting, including the use of compatible architecture and materials, to the maximum extent feasible.
- (b) **Historic resource.** A certificate of appropriateness for a significant alteration of a historic resource shall be granted by the hearing body upon finding that:
 - (1) The proposed alteration retains the essential architectural elements which make the resource historically valuable
 - (2) The proposed alteration maintains continuity and scale with the materials and design context of the historic resource, to the maximum extent feasible

FINDINGS FOR RELOCATION OF A LANDMARK OR HISTORIC RESOURCE

A certificate of appropriateness for the relocation of a landmark or historic resource shall be granted by the hearing body upon finding that:

- a) Adaptive reuse or rehabilitation of the landmark or historic resource is not economically viable on the existing site
- b) The site to which the landmark or historic resource would be moved is in Belmont and is appropriate for the continued use of the building
- c) The respective landmark or historic resource findings of section 7-187(a) or (b) are made

FINDINGS FOR DEMOLITION OF A LANDMARK OR HISTORIC RESOURCE

A certificate of appropriateness for the demolition of a landmark or historic resource shall be granted by the hearing body upon finding that:

- a) Prior to demolition, the building will be photographically recorded to Historic American Building Survey Standards plus any other recordation appropriate to the significance of the historic resource or landmark and two (2) copies shall be filed with the City of Belmont, Department of Planning and Community Development; and (b) or (c) below
- b) Adaptive reuse or relocation of the landmark or historic resource is not economically viable
- c) The implementation of the broader city goals in the general plan or specific plan provides a city benefit that overrides the benefit to the general public of preserving the landmark or historic resource, as described in the purpose section of this article

City of Belmont 2035 General Plan Goals, Policies, and Actions

Adopted in 2017, the City's existing General Plan identifies outlines policies for enhancing protection of archaeological and built-environment historical resources in the context of growth and change under the General Plan. Chapter 5, Conservation Element implemented the following goal, policies, and actions to preserve archaeological resources.

Goal 5.12 Preserve and protect areas and sites of prehistoric, cultural, and archaeological significance.

Policy 5.12-1: Ensure that development avoids potential impacts to sites suspected of being archeologically, paleontologically, or culturally significant, tribal or otherwise, or of concern by requiring appropriate and feasible mitigation.

Action 5.12-1a: Establish guidelines and mitigation programs when sites of archaeological, paleontological, and/or cultural concern, tribal or otherwise, would be disturbed by development, including:

- Requiring a records review for development proposed in areas that are considered archaeologically or paleontologically sensitive;
- Determining the potential effects of development and construction on archaeological or paleontological resources (as required by CEQA);
- Requiring pre-construction surveys and monitoring during any ground disturbance for all development in areas of historical and archaeological sensitivity; and,
- Implementing appropriate measures to avoid the identified impacts, as conditions of project approval.

Policy 5.12-2: If cultural, archaeological, paleontological, or cultural resources, tribal or otherwise, are discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected until evaluation by a qualified professional is completed.

- A qualified archaeologist or paleontologist must make an immediate evaluation and avoidance measures or appropriate mitigation should be completed, according to *CEQA Guidelines*.
- Use the State Office of Historic Preservation's recommendations for the preparation of Archaeological Resource Management Reports as guidelines.

To address potential impacts to built-environment historical resources, Sections 2.5 and 2.23 of the General Plan Land Use Element specifies the following goals, policies, and actions:

Goal 2.5 Enhance the Belmont Village PDA and develop a distinct identity for the area as Belmont's vibrant town center for residents and visitors with commercial, residential, dining, civic, cultural, and entertainment activities.

Policy 2.5-5: In accordance with the Belmont Village Specific Plan, provide incentives for infill development and redevelopment and adaptive reuse and restoration of existing buildings where appropriate in Belmont Village.

Goal 2.23 Conserve designated historic and cultural sites and structures that help define Belmont's identity and character.

Policy 2.23-1: Update the City's inventory of historic resources to ensure that historic resources are preserved and protected in Belmont.

Policy 2.23-2: Ensure that City ordinances adequately recognize and protect historic resources.

Action 2.23-2a: Incorporate historic preservation in the Zoning Ordinance, rather than elsewhere in the Municipal Code.

Action 2.23-2b: Update the City’s historic preservation regulations to make them more easily understood and to make procedures less cumbersome, such as streamlining the process for issuing building permits for minor repairs and alterations. Include, as appropriate, preservation incentives, such as use of the California Historic Building Code, where appropriate, and other available incentives.

Action 2.23-2c: Develop a preservation strategy for historic resources, or structures with historic character or qualities, that may not be located within a designated historic district.

Policy 2.23-3: Consider creating a Historic Preservation Commission to administer and advise on historic preservation matters, such as updating the inventory of historic resources and updating the historic preservation ordinance.

Policy 2.23-4: Encourage adaptive reuse of historic structures – preserving their original design and character – as an option for preserving sites that are threatened with demolition or degradation.

Policy 2.23-6: Support efforts to increase public awareness and appreciation of local historic resources and promote community history.

4.4.3 Impact Analysis

This section describes how the Draft Housing Opportunity Sites was assessed, what the potential impacts to cultural resources are for this project, and the mitigation measures required to reduce impacts to a less than significant level.

The significance thresholds used in this analysis are based on Appendix G of the *CEQA Guidelines*. For the purposes of this EIR, a significant impact would occur if implementation of the proposed project would result in any of the following conditions:

1. Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5
3. Disturb any human remains, including those interred outside of dedicated cemeteries

Threshold: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
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Impact CUL-1 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF POTENTIAL DEMOLITION, ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON SIGNIFICANCE OF HISTORICAL RESOURCES.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Under the proposed project, the maximum allowable building height would be increased to 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*. Although the allowable height would be increased and height would increase on some sites which could result in deeper foundations and structural elements being necessary, this would not impact the area of ground

disturbance during site development. Therefore, the increase in height would not have a significant impact. In addition, a number of federal, state, and local regulations protect historical resources, including numerous Belmont General Plan policies. For example, General Plan Policies 2.5-5, 2.23-1 through 2.23-4, and 2.23-6 promote the recognition and protection of historical resources. Policies 2.5-5 and 2.23-4 specifically call for the adaptive reuse and restoration of existing of historical resources. Policies 2.23-1 through 2.23-6 call for the protection and preservation of the City of Belmont's historical and cultural resources. In addition, the City's historic preservation ordinance, City of Belmont Municipal Code, Chapter 7, Article VII, provides procedures for the local designation of historic properties and mitigation of development-related impacts to locally designated properties through adaptive reuse, relocation, and documentation. These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development that could affect cause a substantial adverse change in a historical resource, no impact would occur.

With implementation of these General Plan policies, as well as compliance with federal, State, and local regulations, the impact of development facilitated by the project to historical resources would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact CUL-2 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON THE SIGNIFICANCE OF ARCHAEOLOGICAL RESOURCES.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Under the proposed project, the maximum allowable building height would be increased to 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*. The increased height allowance on some of the Draft Housing Opportunity Sites would likely result in further site excavation for deeper foundations to support taller buildings. However, this would not impact the area of ground disturbance during site development and would not lead to substantial effects on archaeological resources beyond those allowed under current zoning. Therefore, the increase in height under project rezoning would not have a significant impact. In addition, a number of federal, state, and local regulations protect archaeological resources, including numerous Belmont General Plan policies. For example, all archaeological resources are subject to General Plan Policies 5.12-1 and 5.12-2. Policy 5.12-1 ensures that development avoids potential impacts to sites suspected of being archaeologically or culturally significant, Tribal or otherwise, or of concern by requiring appropriate and feasible mitigation. This policy requires cultural resources record searches in areas considered

archaeologically sensitive, pre-construction surveying, monitoring of ground-disturbance, and the application of mitigation measures that ensure less-than-significant impacts to cultural resources. Policy 5.12-2 requires that, upon the unanticipated discovery of cultural resources, all construction activities must stop until a qualified archaeologist has accessed the discovery and determined the proper mitigation measure (if necessary) required to reduce impacts to a less-than-significant level.

These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development that could affect archaeological resources, no impact would occur.

With implementation of these General Plan policies, as well as compliance with federal, State, and local regulations, the impact of the development facilitated by the project to archaeological resources would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project disturb any human remains, including those interred outside of formal cemeteries?
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Impact CUL-3 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON HUMAN REMAINS.

Human burials outside of formal cemeteries can occur in prehistoric archeological contexts. While no known burial sites have been identified in the Draft Housing Opportunity Sites, excavations during construction activities could have the potential to disturb these resources, which include Native American burial sites. Although it is unlikely that human remains are present, all Draft Housing Opportunities Sites have at least the possibility of containing previously unidentified human remains.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Although rezoning under the proposed project would allow buildings up to a maximum height of 65 feet to be built which could result in deeper foundations needing to be built, there would not be a significant impact because the area of ground disturbed would not be increased.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097 of the California PRC. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the

disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

Development facilitated by the project would be subject to State of California Health and Safety Code Section 7050.5 that states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the coroner must notify the NAHC, which shall determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 24 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. Adherence to these laws ensures that any unanticipated discovery of human remains is treated properly and respectfully and that impacts to those remains would be reduced to less than significant. State laws require consultation with the NAHC and MLD so that Native American remains are treated properly according to tribal customs. Therefore, potential impacts to Native American remains would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.4.4 Cumulative Impacts

Development facilitated by the project, in conjunction with other nearby past, present, and reasonably foreseeable probable future projects in the region could adversely impact cultural resources. Cumulative development in the region would continue to disturb areas with the potential to contain historical resources, archaeological resources, and human remains. For other developments that would have significant impacts on cultural resources, similar conditions described herein would be imposed on those other developments consistent with the requirements of CEQA, along with requirements to comply with all applicable laws and regulations governing said resources. Cumulative buildout of the City's General Plan is considered part of this cumulative analysis.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Existing policies and regulations would continue to apply to development in Belmont and provide the same level of protection as under existing conditions. Although rezoning under the proposed project would allow some Draft Housing Opportunity Sites identified in Figure 2-4 of Section 2, *Project Description*, to be built up to 65 feet in height, this would not change the area of ground disturbance which could occur under current zoning. Therefore, the project would not contribute to a cumulative impact on historical or archaeological resources.

Future projects and cumulative projects in the region would involve ground-disturbing activities which could encounter human remains. If human remains are found, the proposed project and cumulative projects would be required to comply the State of California Health and Safety Code Section 7050.5, as described in Impact CUL-3, above. With adherence to existing regulations relating to human remains, cumulative impacts would be less than significant, and the project's impacts would not be cumulatively considerable.

4.5 Energy

This section evaluates impacts to energy, including the potential wasteful, inefficient, or unnecessary consumption of energy, associated with the implementation of the proposed project.

4.5.1 Setting

Energy relates directly to environmental quality because energy use can adversely affect air quality and other natural resources. Fossil fuels are burned to create electricity to power homes and vehicles, which creates heat. Transportation energy use relates to the fuel efficiency of cars and trucks, and the availability and use of public transportation, the choice of different travel modes (auto, carpool, and public transit), and the miles traveled by these modes. Construction and routine operation and maintenance of infrastructure also consume energy, as do residential land uses, typically in the form of natural gas and electricity.

Energy Supply

Natural gas-fired generation has dominated electricity production in California for many years. In 2019, however, the two largest sources of energy produced in California were crude oil at approximately 920.1 trillion British thermal units (Btu), and renewable energy sources at approximately 1,139.6 trillion Btu, while natural gas production was 220.8 trillion Btu and nuclear electric power was 168.8 trillion Btu (Energy Information Administration [EIA] 2021a). The City of Belmont contains no oil/gas fields. The nearest one is located in Half Moon Bay, approximately 10 miles southwest of the City, but the City has no active wells (California Department of Conservation, Division of Oil, Gas & Geothermal Resources 2021).

Energy Consumption and Sources

Total energy consumption in the United States in 2020 was approximately 104.53 quadrillion Btu (EIA 2021b). In 2020, petroleum provided approximately 35 percent of that energy, with other sources of energy coming from natural gas (approximately 34 percent), coal (approximately 10 percent), total renewable sources (approximately 12 percent), and nuclear power (approximately 9 percent). On a per capita basis in 2019, California was ranked the second lowest State in terms of total energy consumption (197.8 million Btu [MMBtu] per person), or about 35 percent less than the U.S. average per capita consumption of 305.4 MMBtu per person (EIA 2019a).

Electricity and Natural Gas

Most of the electricity generated in California is from natural gas-fired power plants, which provided approximately 35 percent of total electricity generated in 2020 (California Energy Commission [CEC] 2020). In 2020, California produced 70 percent of the electricity it used and imported the rest from outside the State. In 2019, California used 263,329 gigawatt hours (GWh) of electricity, with 201,784 GWh produced in-State (EIA 2020).

San Mateo County as a whole consumed approximately 214 million therms of natural gas in 2019 in both residential and non-residential uses (CEC 2021a). San Mateo County also consumed approximately 4,325 GWh of electricity in 2019 from residential and non-residential uses (CEC 2021b).

Two electricity providers serve the City of Belmont: Peninsula Clean Energy (PCE) and Pacific Gas and Electric Company (PG&E). PG&E is also the natural gas provider for the City. PCE provides clean energy that is 100 percent carbon free, either sourced entirely from renewable energy (50 percent solar and 50 percent wind) or 52.2 percent renewable (including biomass & waste, geothermal, small hydroelectric, solar, and wind). PCE aims to provide only 100 percent renewable by 2025. (PCE 2021). PG&E's default power mix offers 29 percent renewable, and they offer customers options for 64 percent or 100 percent renewable power mixes (PG&E 2019). In conjunction with the utility companies, the California Public Utilities Commission (CPUC) is involved in energy conservation programs.

Petroleum

Energy consumed by the transportation sector accounts for roughly 39.4 percent of California's energy demand, amounting to approximately 3,073.3 trillion Btu in 2019 (EIA 2019a). Petroleum-based fuels are used for approximately 98.4 percent of the State's transportation activity (EIA 2019b). Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet State-specific formulations required by the California Air Resources Board (CARB). California's transportation sector, including on-road and rail transportation, consumed approximately 662 million barrels of petroleum fuels in 2019 (EIA 2021c).

As shown in Table 4.5-1, approximately 214 million gallons of fuel were consumed in San Mateo County in 2019, of which approximately 322 million gallons were gasoline and approximately 19 million gallons were diesel fuel (CEC 2021c). This equates to approximately 0.88 million gallons of fuel per day or 1.15 gallons of fuel per person per day, based on a 2021 countywide population of 765,245 people (California Department of Finance [DOF] 2021).

The City of Belmont consumed approximately 8.2 million gallons of gasoline in 2019 (CEC 2021c). This equates to approximately 0.02 million gallons of fuel per day or 0.76 gallons of fuel per person per day, based on a 2021 countywide population of 26,470 people (DOF 2021).

According to the CEC, 1 gallon of gasoline is equivalent to approximately 109,786 Btu, while 1 gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017). Based on this formula, approximately 103 billion Btu in transportation fuel were consumed per day in 2019 in San Mateo County, while 2.2 billion Btu in gasoline was consumed per day in 2019 in the City (see Table 4.5-1).

Table 4.5-1 Annual and Daily Transportation Energy Consumption in San Mateo County and the City of Belmont

Fuel Type	2019 Annual Fuel Use (million gallons)	2019 Daily Fuel Use (million gallons)	2019 Daily Energy Use (billions of Btu)	2019 Daily per Capita Energy Use (thousands of Btu)
Gasoline (County)	322	0.88	96.6	126.2
Diesel (County)	19	0.05	6.4	8.4
Total (County)	341	0.93	103	134.6
Gasoline (City)	8.2	.02	2.2	83.1

Notes: Btu = British thermal units

Source: CEC 2021c

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. The use of these fuels is encouraged through various Statewide regulations and plans (e.g., Low Carbon Fuel Standard and Health and Safety Code Section 38566 [Senate Bill (SB) 32]). Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with many alternative fuels including the following:

Hydrogen is being explored for use in combustion engines and fuel cell electric vehicles. The interest in hydrogen as an alternative transportation fuel stems from its clean-burning qualities, its potential for domestic production, and the fuel cell vehicle's potential for high efficiency (two to three times more efficient than gasoline vehicles). Currently, 47 open hydrogen refueling stations are in California. None are in Belmont, but there is one in San Mateo County at 248 South Airport Boulevard in South San Francisco, approximately 11.5 miles northwest from Belmont (California Fuel Cell Partnership 2021).

Biodiesel is a renewable alternative fuel that can be manufactured from vegetable oils, animal fats, or recycled restaurant greases. Biodiesel is biodegradable and cleaner-burning than petroleum-based diesel fuel. Biodiesel can run in any diesel engine generally without alterations but fueling stations have been slow to make it available. There are 9 biodiesel refueling stations in California, two of which are in the San Francisco Bay Area (U.S. Department of Energy 2021).

Electricity can be used to power electric and plug-in hybrid electric vehicles directly from the power grid. The electricity grid usually provides electricity used to power vehicles, which store it in the vehicle's batteries. The electricity provided by PCE is 100 percent carbon free (PCE 2021). Fuel cells are being explored to use electricity generated on board the vehicle to power electric motors. Electrical charging stations are available throughout Belmont and San Mateo County.

a. Energy and Fuel Efficiency

Though the demand for gasoline and diesel fuel is rising because of population growth and limited mass transit, the increase in demand can be offset partially by efficiency improvements. Land use policies that encourage infill and growth near transit centers (e.g., following SB 375, the Sustainable Communities and Climate Protection Act of 2008), improvements to fuel efficiency, and gradual replacement of the vehicle fleet with new, more fuel-efficient and alternative-fuel as well as electric cars will all reduce fuel use. In the future, increasing gasoline prices may apply downward pressure to gasoline demand in the State.

4.5.2 Regulatory Setting

Programs and policies at the State and national levels have emerged to bolster the previous trend towards energy efficiency, as discussed below.

a. Federal Regulations

Energy Policy Conservation Act and Corporate Average Fuel Economy

The Energy Policy Conservation Act (Corporate Average Fuel Economy [CAFE]) of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration, part of the U.S. Department of Transportation, is responsible for revising existing fuel economy standards and establishing new vehicle fuel economy standards.

The CAFE program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Compliance with CAFE standards is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the U.S.

National Energy Policy Act of 1992

The National Energy Policy Act of 1992 (EPACT92) calls for programs that promote efficiency and the use of alternative fuels. EPACT92 requires certain federal, State, and local governments and private operators to stock vehicle fleets with a percentage of light duty alternative fuel vehicles each year. In addition, EPACT92 has financial incentives: federal tax deductions will be allowed for businesses and individuals to cover the incremental cost of alternative fuel vehicles. EPACT92 also requires states to consider a variety of incentive programs to help promote alternative fuel vehicles.

Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, it does the following:

1. Increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels
2. Reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020 – an increase in fuel economy standards of 40 percent over those in 2007

Safer Affordable Fuel-Efficient Vehicles Rule

The Safer Affordable Fuel-Efficient Vehicles Rule, issued March 31, 2020, sets fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model years 2021 through 2026. These standards apply to both passenger cars and light trucks and are a reduction in stringency from the 2012 standards which would have required increases of about 5.0 percent per year. This rule is anticipated to result in a 40.4 mile per gallon industry average for 2026.

b. State Regulations

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The Act established a State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000; codified as Public Resources Code Sections 25720-25721), the CEC and CARB prepared and adopted in 2003 a joint agency report, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030; significantly increase the efficiency of motor vehicles; and reduce per capita vehicle miles traveled (VMT). One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy reports, the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

Integrated Energy Policy Report

SB 1389 (Chapter 568, Statutes of 2002) requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and price to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

California Renewables Portfolio Standard Program

In 2018, the California Renewables Portfolio Standard (SB 100) was signed into law, which increased the renewable portfolio standard (RPS) to 60 percent by 2030 (i.e., that 60 percent of electricity retail sales must be served by renewable sources by 2030) and requires all the State's electricity to come from carbon-free resources by 2045.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. The Act also requires doubled energy efficiency savings in electricity and natural gas for retail customers through increased efficiency and conservation by December 31, 2030.

Assembly Bill 1493: Reduction of Greenhouse Gas Emissions

AB 1493 (Chapter 200, Statutes of 2002), known as the "Pavley bill," amended Health and Safety Code sections 42823 and 43018.5 and requires CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Implementation of new regulations prescribed by AB 1493 required the State of California to apply for a waiver under the federal Clean Air Act. Although the U.S. Environmental Protection Agency (USEPA) initially denied the waiver in 2008, USEPA approved a waiver in June 2009, and in September 2009, CARB approved amendments to its initially adopted regulations to apply the Pavley standards that reduce GHG emissions to new passenger vehicles in model years 2009 through 2016. According to CARB, implementation of the Pavley regulations is expected to reduce fuel consumption while also reducing GHG emissions (CARB 2020).

Energy Action Plan

The first Energy Action Plan (EAP) emerged in 2003 from a crisis atmosphere in California's energy markets. The State's three major energy policy agencies (CPUC, CEC, and the Consumer Power and Conservation Financing Authority [established under deregulation and now defunct]) came together to develop one high-level, coherent approach to meeting California's electricity and natural gas needs. It was the first time that energy policy agencies formally collaborated to define a common vision and set of strategies to address California's future energy needs. They emphasized the importance of the impacts of energy policy on California's environment.

In the October 2005 EAP II, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements earlier EAPs and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other State, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative, nonpetroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-State production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

Bioenergy Action Plan, Executive Order S-06-06

Executive Order (EO) S-06-06, April 25, 2006, establishes targets for the use and production of biofuels and biopower, and directs State agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. EO S-06-06 also calls for the State to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the State can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

1. Increase environmentally and economically sustainable energy production from organic waste
2. Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications
3. Create jobs and stimulate economic development, especially in rural regions of the State
4. Reduce fire danger, improve air and water quality, and reduce waste

Title 24, California Code of Regulations (CCR)

CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. In 2019, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2020. All buildings for which an application for a building permit is submitted on or after January 1, 2020 must follow the 2019 standards. The next update is expected in 2022. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in Title 24.

PART 6 (BUILDING ENERGY EFFICIENCY STANDARDS)

Part 6 of Title 24 contains the 2016 Building Energy Efficiency Standards for new residential and CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The most current standards are the 2019 Title 24 standards (CEC 2018a). The 2019 Standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements (CEC 2018a). Under the 2019 Standards, nonresidential buildings will be 30 percent more energy-efficient compared to the 2016 Standards (CEC 2018b).

California Green Building Standards Code (2019), CCR Title 24, Part 11

California's green building code, referred to as CALGreen, was developed to provide a consistent approach to green building within the State. CALGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved efficiency and process improvements. The requirements pertain to energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

c. Local Regulations

City of Belmont 2035 General Plan

The City of Belmont's 2035 General Plan, adopted in November 2017, includes a couple energy efficiency policies and actions as part of the Conservation and Circulation Elements that support the goal of promoting energy conservation. The following policy and action are applicable to the proposed project (City of Belmont 2017a):

- **Policy 3.2-1:** Promote energy efficiency and accommodate new and improved technology, such as alternative fuel vehicles, in meeting transportation needs.
- **Action 5.11-2a:** Support local actions that will reduce motor vehicle use, support alternative forms of transportation, improve energy efficiency, require energy conservation in new construction, and manage energy in public buildings, in accordance with State law.

City of Belmont 2015-2023 Housing Element

Section 4.4 of the 5th Cycle Belmont Housing Element (2015-2023) includes opportunities for energy conservation. Those strategies include integrated land use and transportation, whereby a range of housing types and affordability are planned near jobs, services, and transit to reduce commutes and traffic congestion. Another strategy is through building design and construction, as housing with energy conservation features should result in reduced monthly occupancy costs by requiring less energy to operate and maintain. Further, there are several energy conservation programs that the City participates in including Peninsula Sunshares (reduced bulk pricing for residential solar installations), Bay Area Regional Energy Network (promotes energy saving program), and PG&E Sustainable Solutions Turnkey Program (streamlined solution to implementing energy conservation projects).

City of Belmont 2017 Climate Action Plan

The City of Belmont adopted a Climate Action Plan (CAP) to demonstrate environmental leadership, promote a green economy, comply with broader California environmental initiatives, and promote sustainable development (City of Belmont 2017b). Section 3.1 of the CAP targets energy reduction strategies through energy efficiency and conservation. The CAP contains several measures in relation to goal 3.1.1 that aims to “Increase municipal, residential, and commercial energy efficiency, renewable energy, efficient water use, and green building.”

- **Measure EC2:** Update CALGreen for residential buildings triennially. Work to mandate achievement of CALGreen Tier 1 energy performance.
- **Measure EC3:** Provide financial incentives for solar PV and hot water system installation.
- **Measure EC4:** Provide or encourage residential energy audits and retrofits. Leverage existing rebates/add additional rebates for energy efficient retrofits.
- **Measure EC6:** Continue to be part of the Peninsula Clean Energy (PCE) Community Choice Aggregation (CCA) Program and continue to opt for the ECO100 option (100 percent renewable energy) for all City facilities.
- **Measure EM2:** Implement a sustainable purchasing policy that emphasizes recycled materials and Energy Star equipment.
- **Measure EM4:** Complete feasibility study on the installation of solar or other renewable energy projects at City facilities and install where feasible. Set a goal for renewable energy purchase if installation is not feasible.
- **Measure EM5:** Participate in San Mateo County Energy Watch and leveraged benchmarking to identify EE audit and retrofit projects and track energy performance.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

Significance Thresholds

An energy-related impact is considered significant if the proposed project would result in one or more of the following conditions:

1. Wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation
2. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency

Methodology

Public Resources Code Section 21100(b)(3) states that an EIR shall include “mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” The physical environmental impacts associated with the use of energy, including the generation of electricity and burning of fuels, have been accounted for in Section 4.2, *Air Quality*, and Section 4.7, *Greenhouse Gas Emissions*. Energy consumption is analyzed herein in terms of construction and operational energy.

The California Emissions Estimator Model (CalEEMod) version 2020.4.0 was used to approximate the natural gas and electricity consumption from developments under the proposed project. This analysis then determined whether energy consumed during construction and operation would be wasteful, inefficient, or unnecessary. Construction energy demand accounts for anticipated energy consumption during construction of development facilitated by the proposed project, such as fuel consumed by construction equipment and construction workers’ vehicles traveling to and from the construction site. These construction activities would temporarily create a higher demand for energy supplies. The extent of energy use generated by construction equipment would depend on the quantity of equipment used and the hours of operation for each project.

Operational energy demand accounts for the anticipated energy consumption during operation of the development facilitated by the project, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to, lighting, water conveyance, and air conditioning.

b. Project Impacts and Mitigation Measures

Threshold:	Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
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Impact E-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Demolition and Construction

Demolition and construction activities associated with development facilitated by the project would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary power may be provided for construction trailers and electric construction equipment. Table 4.5-2 summarizes the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the Draft Housing Opportunity Sites. The manufacture and procurement of building materials used in construction of development facilitated by the project would require energy use. The California Natural Resources Agency's (CNRA) Final Statement of Reasons notes that "a full 'lifecycle' analysis that would account for energy used in building materials and consumer products will generally not be required" (CNRA 2018). Furthermore, it is reasonable to assume that manufacturers of concrete, steel, lumber, or other building materials would employ energy conservation practices to minimize their cost of doing business. It also is reasonable to assume that non-custom building materials, such as drywall and standard-shaped structural elements, will be manufactured regardless of the project and, if not used for the project, would be used elsewhere. Therefore, the consumption of energy required for the manufacturing of building and construction material is not part of the quantitative analysis.

As stated in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. The rezoning which would occur as part of the project could change the maximum height up to 65 feet allowed on certain sites, especially along the El Camino Real corridor as shown in Figure 2-4 of Section 2, *Project Description*. This could result in more construction-related energy-consuming activities such as construction of deeper foundations to support increased building heights. However, this would not have a significant energy impact because construction-related activities at a similar scale would already take place on the Draft Housing Opportunity Sites under existing zoning.

As shown in Table 4.5-2, demolition and construction activities from development facilitated by the project would require approximately 1.7 million gallons of gasoline and 850,000 gallons of diesel fuel. Energy use during demolition and construction would be temporary, and construction equipment used would be typical of similar-sized construction projects in the region. Development facilitated by the project would utilize construction contractors that comply with applicable CARB regulations such as accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment, and restricted idling of heavy-duty diesel motor vehicles. Construction contractors are required to comply with the provisions of CCR Title 13, sections 2449 and 2485, prohibiting diesel-fueled commercial and off-road vehicles from idling for more than five minutes, minimizing unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel

consumption. These construction equipment standards are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Electrical power would be consumed during demolition and construction activities, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the area.

Table 4.5-2 Project Construction Energy Usage

Source	Gasoline (gallons)	Diesel (gallons)
Construction Equipment & Vendor/Hauling Trips	—	851,163
Construction Worker Vehicle Trips	1,681,354	—
See Appendix AQ for CalEEMod default values for fleet mix and average distance of travel and Appendix NRG for energy calculation sheets.		

Overall, demolition and construction activities would not have an adverse impact on available electricity supplies or infrastructure. Demolition and construction activities would utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. Per applicable regulatory requirements such as 2019 or later CALGreen, development facilitated by the project would comply with construction waste management practices to divert construction and demolition debris from landfills. These practices would result in efficient use of energy by construction facilitated by the project.

Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. The project is a response to housing demand that, if not fulfilled by the project, would likely result in new construction elsewhere, with associated increased in commuter VMT. The energy used to construct the project is necessary because the project is intended to meet existing housing demands. Therefore, project demolition and construction activities would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Operation

Project operation would contribute to regional energy demand by consuming electricity, natural gas, and gasoline and diesel fuels. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, and water and wastewater conveyance, among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by residents. The project aims to provide housing opportunities in urbanized areas near transit, Downtown jobs, services, and open spaces, limiting the increase in travel required by new residents. The project also identified Draft Housing Opportunity Sites to better utilize the El Camino Real corridor and amend a zoning ordinance to rezone Service Commercial properties to Corridor Mixed Use. Rezoning along the El Camino Real corridor would ensure that a substantial number of new residences envisioned in the Housing Element are in proximity to commercial, retail, and employment destinations. This would limit the number and length of typical residential vehicle trips, and thus lower energy use.

As shown in Table 4.5-3, vehicle trips related to the project would require approximately 2 million gallons of gasoline and 300,000 gallons of diesel fuel, or 250,000 MMBtu annually (see Appendix NRG for energy calculation sheets). This equates to an 86.4 thousands of Btu (kBtu) per capita daily

transportation energy use for the project.¹ This is substantially lower than the City's 2019 average daily per capita transportation energy use of 134.6 kBtu (refer to Table 4.5-1). Gasoline and diesel fuel demands would be met by existing gasoline stations in the vicinity of the Draft Housing Opportunity Sites. Furthermore, vehicles driven by future residents of development facilitated by the project would be subject to increasingly stringent State fuel efficiency standards, thereby minimizing the potential for the inefficient consumption of vehicle fuels. As a result, vehicle fuel consumption resulting from the project would not be wasteful, inefficient, or unnecessary.

Table 4.5-3 Project Operational Energy Usage

Source	Energy Consumption	Energy Consumption (in MMBtu)
Vehicle Trips		
Gasoline	2,012,321 gallons	220,925
Diesel	306,995 gallons	39,130
Built Environment		
Electricity	13,308,100 kWh	45,409
Natural Gas Usage	64,402,700 kBtu	64,403

Note: MMBtu = millions of British thermal units; kWh = kilowatt-hours; kBtu = thousands of British thermal units.

See Appendix AQ for CalEEMod default values for fleet mix and average distance of travel and Appendix NRG for energy calculation sheets.

As shown in Table 4.5-3, in addition to transportation energy use, development facilitated by the projects would require permanent grid connections for electricity and natural gas. Development facilitated by the project would consume approximately 13 million kilowatt-hours (kWh), or 45,000 MMBtu per year of electricity for lighting and large appliances, and approximately 64.4 million kBtu, or 64,000 MMBtu per year of natural gas for heating and cooking (see Appendix AQ for CalEEMod results). Electricity would be provided by on-site solar, PCE (the default electricity provider in the City), and/or PG&E. PCE provides electricity from cleaner power sources with lower GHG emissions than PG&E, although customers can opt out of PCE service and be provided electricity from PG&E. PG&E would supply natural gas. As discussed in detail in Section 4.7, *Greenhouse Gas Emissions*, the 2019 Building Energy Efficiency Standards require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less to supply much of the on-site electricity demand. Given historic electricity use, CEC's and CPUC's long-range planning efforts, and future on-site solar generation, there would be adequate capacity to meet demand for electricity. Furthermore, utility-driven California natural gas demand is expected to decrease at a rate of 1 percent per year from 2019 to 2035; therefore, the incremental increase in natural gas consumption from development facilitated by the project would not indirectly result in the need to secure additional natural gas supplies or construct new or expanded natural gas processing plants (California Gas and Electric Utilities 2020).

Development facilitated by the project would comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (CCR Title 24, Parts 6 and 11) or later versions, which are anticipated to be more stringent than the 2019 codes. The 2019 standards require the provision of electric vehicle charging equipment, water-efficient plumbing fixtures and fittings, recycling services, solar on low-rise residential development, and other energy efficiency measures that would reduce the potential for the inefficient use of energy.

¹ Calculation: Annual fuel consumption (254,144 MMBtu, or 254,144,000 kBtu) divided by 365 days and divided by the total new residents (8,063 residents).

Some of the anticipated 8,250 new residents that would be accommodated by the project, as identified in section 4.12 *Population and Housing*, are likely already living in the City or within the Bay Area under Association of Bay Area Governments' (ABAG) jurisdiction, and therefore they would not create substantial energy demands in the region beyond that which they consume at this time. The project would encourage the development of modern residential buildings, which would consume less energy in the forms of electricity and natural gas than existing, older buildings on the Draft Housing Opportunity Sites and in the surrounding areas. Further, development facilitated by the project would be located in the vicinity of transit, Downtown jobs, services, and open space, which would reduce energy use by lowering VMT. As described above, development facilitated by the project would not result in a wasteful, inefficient, or unnecessary consumption of energy, and would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?
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Impact E-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT AN APPLICABLE RENEWABLE ENERGY OR ENERGY EFFICIENCY PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.5.2 *Regulatory Setting*, several State plans as well as the City's adopted General Plan include energy conservation and energy efficiency strategies intended to enable the State and the City to achieve GHG reduction and energy conservation goals. A full discussion of the proposed project's consistency with GHG reduction plans is included in Section 4.7, *Greenhouse Gas Emissions*. As shown in Table 4.5-4, development facilitated by the project would be consistent with State renewable energy and energy efficiency plans.

Table 4.5-4 Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Assembly Bill 2076: Reducing Dependence on Petroleum. Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, <i>Reducing California's Petroleum Dependence</i> , in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.	Consistent. As described above, the project would encourage housing development on the Draft Housing Opportunity Sites in urbanized areas that are near transit, Downtown jobs, services, and open spaces, limiting the increase in travel required by new residents. Further, as described in Section 2.6.3, <i>Zoning Amendments</i> , 47 of the 144 Draft Opportunity Housing Sites would be affected by a zoning ordinance amendment that raises the maximum building height to 65 feet. Additionally, 44 sites, zoned as Corridor Mixed Use, would benefit from a higher maximum floor area ratio (FAR) and no density maximum. Both of these amendments would serve to reduce VMT by placing new dense housing in a mixed-use area.

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
<p>2019 Integrated Energy Policy Report. The 2019 report highlights the implementation of California’s innovative policies and the role they have played in establishing a clean energy economy, as well as provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.</p>	<p>Consistent. The proposed project would encourage housing development on the Draft Housing Opportunity Sites and increase density along the El Comino Real corridor. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24. Compliance would include rooftop solar on all residential building types that are three stories or less in height. Electricity would be provided either by PG&E or PCE, which source some or all their power from renewable sources. Given these features, the project would facilitate decarbonization of buildings (removing GHG emissions from the building’s energy use), the increase in energy efficiency savings, and integration of more renewable energy into the electricity system. Therefore, the project would not conflict with or obstruct implementation of the 2019 Integrated Energy Policy Report.</p>
<p>California Renewable Portfolio Standard. California’s RPS obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.</p>	<p>Consistent. PCE and PG&E supply electricity in the City and they are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. PCE already has an option for residents to source 100 percent renewable energy. Because PCE and PG&E would provide electricity service to the Draft Housing Opportunity Sites, the proposed project would not conflict with or obstruct implementation of the California Renewable Portfolio Standard.</p>
<p>Energy Action Plan. In the October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the State’s ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.</p>	<p>Consistent. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24. Compliance would include rooftop solar on all residential building types that are three stories or less in height. Electricity would be provided either by PG&E or PCE, which source some or all their power from renewable sources. Given these features, the project would facilitate implementation of the nine major action areas in the EAP. Therefore, the project would not conflict with or obstruct implementation of the EAP.</p>
<p>AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California’s goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.</p> <p>Bioenergy Action Plan, EO S-06-06. The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of</p>	<p>Consistent. The project would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Therefore, the project would not conflict with or obstruct implementation of the Bioenergy Action Plan or the State Alternative Fuels Plan.</p>

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
<p>its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.</p> <p>Title 24, CCR – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen). The 2019 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less.</p> <p>The CALGreen Standards establish green building criteria for residential and nonresidential projects. The 2019 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts.</p>	<p>Consistent. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24. Therefore, the project would not conflict with or obstruct implementation of the Title 24 standards.</p>

The City's General Plan includes a goal and two policies that necessitate actions to track energy use and improve energy efficiency and conservation. The City's CAP, adopted in accordance with General Plan policy 5.11-1, includes several measures that work to improve energy efficiency and conservation. As shown in Table 4.5-5, development facilitated by the project would be consistent with the energy conservation and efficiency strategies contained in the City General Plan and CAP.

- **Policy 3.2-1:** Promote energy efficiency and accommodate new and improved technology, such as alternative fuel vehicles, in meeting transportation needs.
- Action 5.11-2a: Support local actions that will reduce motor vehicle use, support alternative forms of transportation, improve energy efficiency, require energy conservation in new construction, and manage energy in public buildings, in accordance with State law.

The proposed project would be consistent with the City's adopted energy conservation and efficiency strategies contained in its General Plan and CAP. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Table 4.5-5 Consistency with the City General Plan and Climate Action Plan

Proposed Project Consistency	
General Plan Energy Efficiency Policy or Action	
<p>Policy 3.2-1: Promote energy efficiency and accommodate new and improved technology, such as alternative fuel vehicles, in meeting transportation needs.</p>	<p>Consistent. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24. Development facilitated by the project would be required to use efficiency lighting, implement sustainable purchasing, study feasibility of solar or other renewable energy, and participate in San Mateo County Energy Watch.</p>
<p>Action 5.11-2a: Support local actions that will reduce motor vehicle use, support alternative forms of transportation, improve energy efficiency, require energy conservation in new construction, and manage energy in public buildings, in accordance with State law.</p>	<p>Consistent. Development facilitated by the project would be required to comply with energy conservation regulations and policies applicable to new residential developments, including California’s Energy Efficiency Standards (CCR Title 24, Part 6) and CALGreen. Development facilitated by the project would be required to comply with City energy conservation standards and would be constructed per the most recent energy efficiency standards, as required for new residential developments. Development would be located in proximity to transit, Downtown jobs, services, and open spaces, which would reduce motor vehicle use and support alternative forms of transportation.</p>
CAP Measure	
<p>Measure EC2: Update CALGreen for residential buildings triennially. Work to mandate achievement of CALGreen Tier 1 energy performance.</p> <p>Measure EC3: Provide financial incentives for solar PV and hot water system installation.</p> <p>Measure EC6: Continue to be part of the Peninsula Clean Energy (PCE) Community Choice Aggregation (CCA) Program and continue to opt for the ECO100 option (100 percent renewable energy) for all City facilities.</p>	<p>Consistent. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24. Compliance would include rooftop solar on all residential building types that are three stories or less in height. Residents of new development would be enrolled in PCE by default, which provides electricity sourced from 100 percent renewable energy.</p>
<p>Measure EM2: Implement a sustainable purchasing policy that emphasizes recycled materials and Energy Star equipment.</p> <p>Measure EM5: Participate in San Mateo County Energy Watch and leveraged benchmarking to identify EE audit and retrofit projects and track energy performance.</p>	<p>Consistent. Development facilitated by the project would be required to comply with the City Code, Article IV, Division 1, which mandates the implementation of Title 24. Development facilitated by the project would be required to use efficiency lighting, implement sustainable purchasing, study feasibility of solar or other renewable energy, and participate in San Mateo County Energy Watch.</p>

4.5.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for energy consumption is the City of Belmont. This geographic scope is appropriate because the smallest scale at which energy consumption information is readily available is the City level. Cumulative buildout of the City's General Plan is considered part of this cumulative analysis.

Cumulative development would increase demand for energy resources, but those resources would not be consumed in a wasteful, inefficient, or unnecessary manner. However, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley Bill regulations under AB 1493.

As described under Impact E-1, development facilitated by the project would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen. Additionally, housing development in infill locations is presumed to lower VMT due to the proximity to office and commercial uses. Therefore, the project's contribution to a significant cumulative energy impact is not cumulatively considerable.

Development facilitated by the project would not result in a wasteful, inefficient, or unnecessary consumption of energy, and operation of the new residential structures would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Therefore, the project would not make a cumulatively considerable contribution to a significant cumulative impact.

The geographic scopes for the cumulative impact analysis of consistency with renewable energy and energy efficiency plans are the State of California and the City of Belmont. Projects throughout the State of California are required to adhere to applicable renewable energy and energy efficiency laws, programs, and policies such as California's RPS, AB 1493, and Title 24 standards. All other pending and future projects in the county would be required to adhere to General Plan policies to mitigate energy impacts where feasible. In addition, all pending and future projects would be reviewed for consistency with the City General Plan and CAP. Therefore, the cumulative impact would be less than significant. As discussed under Impact E-2, development facilitated by the project would be consistent with the energy-related goals, policies, and actions of the Statewide plans and the City General Plan and measures of the CAP; therefore, the project would not make a cumulatively considerable contribution to a significant cumulative impact with respect to consistency with renewable energy and energy efficiency plans.

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4.6 Geology and Soils

This section evaluates the potential impacts relating to geology and soils associated with the implementation of the proposed project.

4.6.1 Setting

a. Regional Geology

The San Francisco Peninsula is at the north end of the Santa Cruz Mountains, one of several coastal ranges in California. In the San Francisco Bay Region, most of the mountains and ridges are formed on a basement of Cretaceous- and Jurassic-age (70- to 200-million years old) rocks of the Franciscan Complex, layers of sedimentary and volcanic rocks, and deposits from the last million years at the surface (City of Belmont 2017a).

The geology of San Mateo County is a result of the past tectonic, volcanic, erosional, and sedimentation processes of the California Coast Range geomorphic province (California Geological Survey [CGS] 2002). The Coast Ranges are northwest-trending mountain ranges (2,000 to 4,000, occasionally 6,000 feet elevation above sea level), and valleys. The ranges and valleys trend northwest, subparallel to the San Andreas Fault. Strata dip beneath alluvium of the Valley. To the west is the Pacific Ocean. The coastline is uplifted, terraced, and wave-cut. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern and southern ranges are separated by a depression containing the San Francisco Bay. The northern Coast Ranges are dominated by irregular, knobby landslide-topography of the Franciscan Complex. The eastern border is characterized by strike-ridges and valleys in Upper Mesozoic strata. In several areas, Franciscan rocks are overlain by volcanic cones and flows of Quien Sabe, Sonoma, and Clear Lake volcanic fields. The Coast Ranges are subparallel to the active San Andreas Fault. The San Andreas Fault is more than 600 miles long, extending from Point Arena to the Gulf of California. West of the San Andreas is the Salinian Block, a granitic core extending from the southern extremity of the Coast Ranges to the north of Farallon Islands (CGS 2002).

b. Local Geologic Setting

City of Belmont Soils

Soils within the City include Fagan Loam, Los Gatos Loam, Maymen Gravelly Loam, Novato Clay, Orthents Cut and Full, and Orthents Cut and Fill-Urban Land Complex. The Orthents and Urban Land complex soils are primarily located in slopes of 5 to 75 percent west of El Camino Real and in slopes of 0 to 5 percent east of El Camino Real. Loam soils are located throughout the City but are primarily found east of El Camino Real. Fagan Loam soil is located in slopes of 15 to 50 percent, Los Gatos Loam in 30 to 75 percent slopes, and Maymen gravelly loam in slopes of 30 to 50 percent. Novato Clay is found west of Highway 101, in 0 to 1 percent slopes (City of Belmont 2017a).

Seismic Hazards

Northern California is a region of high seismic activity. Like most cities in the region, the City of Belmont is subject to risks associated with potentially destructive earthquakes. Earthquakes are most common along geologic faults that are planes of weakness or fractures along which rocks have been displaced. There are no active fault lines within the City. The closest fault zone is the San

Andreas Fault Zone – Peninsula, located approximately one mile from the City’s western boundary. The Hayward Fault is located approximately four miles from the City’s eastern boundary (City of Belmont 2017a).

Surface Rupture

Surface rupture represents the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the earth's surface. Fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault. This can have particularly adverse consequences when buildings are located within the rupture zone. It is not feasible, from a structural or economic perspective, to design and build structures that can accommodate rapid displacement involved with surface rupture. Amounts of surface displacement can range from a few inches to tens of feet during a rupture event.

Faults are geologic hazards because of both surface fault displacement and seismic ground shaking that are distinct but related properties. Surface fault displacement results when the fault plane ruptures and that rupture surface extends to, or intersects, the ground surface. Surface fault rupture can be very destructive to structures constructed across active faults. However, the zone of damage is limited to a relatively narrow area along either side of the fault as opposed to seismic ground shaking damage that can be quite widespread. Faults are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during the Holocene time, which consists of approximately the last 11,000 years. A fault is classified as potentially active if it has experienced movement within Quaternary time, which is during the last 1.8 million years. Faults that have not moved in the last 1.8 million years are generally considered inactive.

As described above, there are no active fault lines within the City. The closest fault zone is the San Andreas Fault Zone – Peninsula, located approximately one mile from the City’s western boundary. The Hayward Fault is located approximately four miles from the City’s eastern boundary (City of Belmont 2017a). Figure 4.6-1 shows the Draft Housing Opportunity Sites in relation to nearby faults and Alquist-Priolo Fault Zones.

Ground Shaking

The major cause of structural damage from earthquakes is ground shaking. The intensity of ground motion expected at a particular site depends upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude. Historically, the City of Belmont has been impacted by ground shaking during major earthquakes in the seismically active Northern California region, and is likely to experience ground shaking from major earthquakes in the future.

Figure 4.6-1 Draft Housing Opportunity Sites Near Fault Zones



Liquefaction

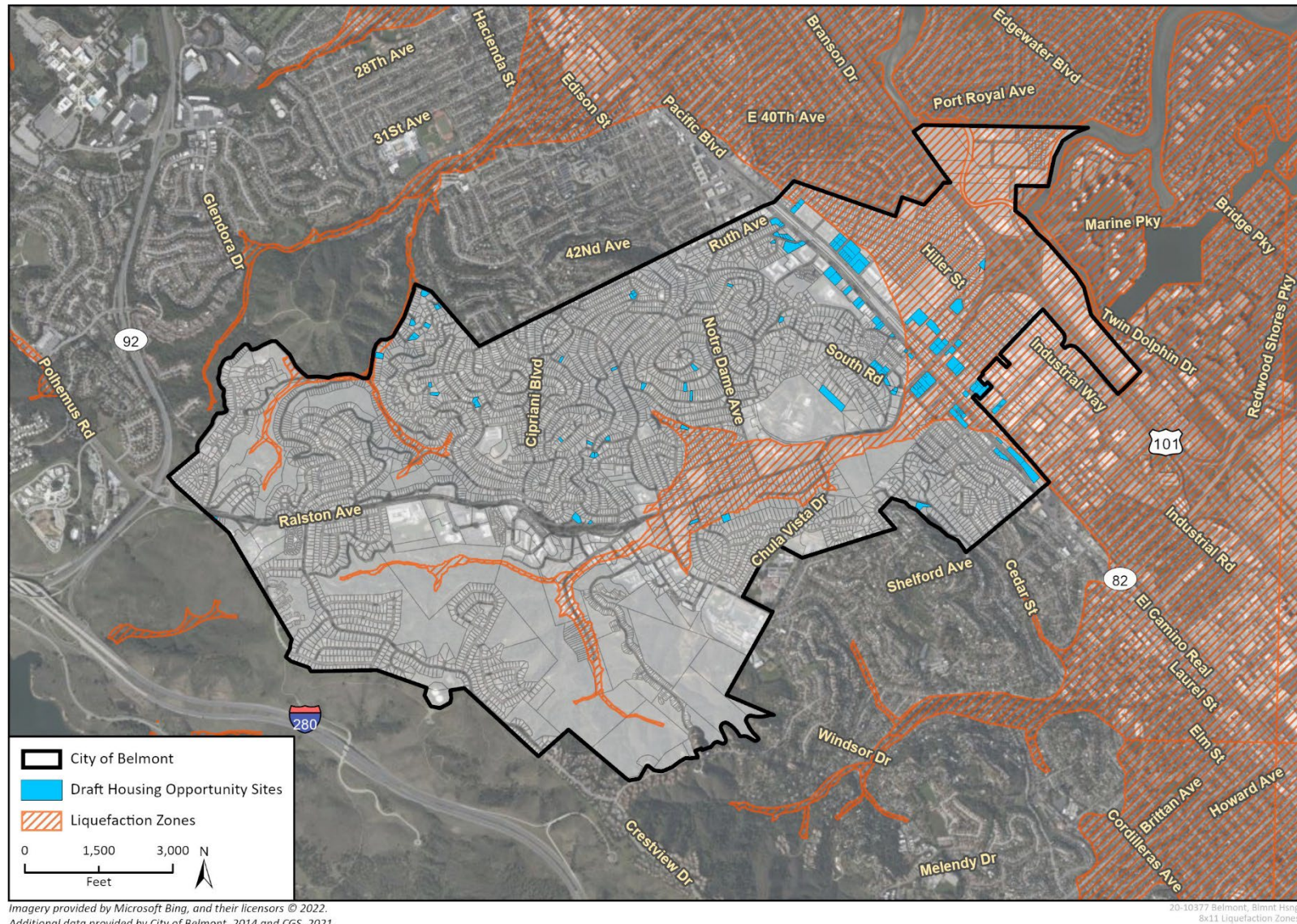
Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. Figure 4.6-2 shows the Draft Housing Opportunity Sites that are located within or near liquefaction zones and are listed in Table 4.6-1.

Table 4.6-1 Draft Housing Opportunity Sites within or near Liquefaction Zones

Draft Housing Opportunity Site No.	Draft Housing Opportunity Site Address	APN
2	505 Dale View Avenue	040246280
5	640 Masonic Way	040312180
10	815 Old County Road	040290260
27	n/a	040320310
29	580 Masonic Way	040315010
36	575 El Camino Real	040334300
37	600 Ralston Avenue	040313270
38	1075 Old County Road	040332270
39	601 Ralstin Avenue	040332220
40	n/a	045182030
41	1325 Old County Road	046031050
42	n/a	045182250
44	951 Old County Road	040313430
45	678 Ralston Avenue	040313280
46	698 Ralston Avenue	040313140
47	884 El Camino Real	045162080
48	898 El Camino Real	045162090
49	641 Ralston Avenue	040332250
50	876 El Camino Real	045162070
51	900 El Camino Real	045163070
52	1141 Old County Road	040332260
53	1161 Old County Road	040332110
54	1325 Old County Road	046031070
55	n/a	045182020
56	n/a	045182040
58	n/a	045244170
59	n/a	045182010
60	n/a	045182210
61	n/a	045244010
62	n/a	045244050
63	n/a	045244020

Draft Housing Opportunity Site No.	Draft Housing Opportunity Site Address	APN
64	n/a	045244070
65	1325 Old County Road	046031080
66	n/a	045244160
67	1324 Old County Road	045241230
68	n/a	045244030
69	n/a	045244040
70	n/a	045244060
71	n/a	045244150
73	1324 Old County Road	045241240
76	1501 El Camino Real	045252080
80	608 Harbor Drive	046032080
81	1325 Old County Road	046031020
82	1325 El Camino Real	046031030
83	n/a	046032030
105	n/a	040313310
108	n/a	043241050
116	n/a	045182260
121	n/a	045182200
123	n/a	045182220
128	n/a	044290080
133	n/a	045081490
134	n/a	045090999
136	608 Harbor Drive	046032040
137	608 Harbor Drive	046032090
138	815 Old County Road	040290310
142	n/a	045182270
54	1325 Old County Road	046031070
82	1325 El Camino Real	046031030
65	1325 Old County Road	046031080
82	1325 Old County Road	046031030

Figure 4.6-2 Liquefaction Zones



Landslides and Slope Stability

Seismic ground shaking can also result in landslides and other slope instability issues. Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more shallow type of slope failure. They typically affect the upper surficial soils horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can be triggered by seismic shaking. The areas most susceptible to landslides are shown on maps prepared by the California Division of Mines and Geology. In addition, landslides occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion, or human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of a slow continuous movement such as a slump or may move very rapidly as a semi-liquid mass such as a debris flow or avalanche. In the City of Belmont, landslide hazards are primarily located in northwest Belmont but there is also a large landslide hazard area in southeast Belmont in the Sunnyslope neighborhood. Slopes greater than 30 percent also present potential landslide hazards and are primarily located in the western portion of the City, specifically the Western Hills and San Juan Hills areas. Within the Belmont Village Specific Plan area, the southwestern edge along Sixth Avenue and Hill Street is adjacent to areas of high landslide risk (City of Belmont 2017a). There are several Draft Housing Opportunity Sites located within a landslide zone as listed in Table 4.6-2 and shown in Figure 4.6-3.

Table 4.6-2 Draft Housing Opportunity Sites Within a Landslide Areas

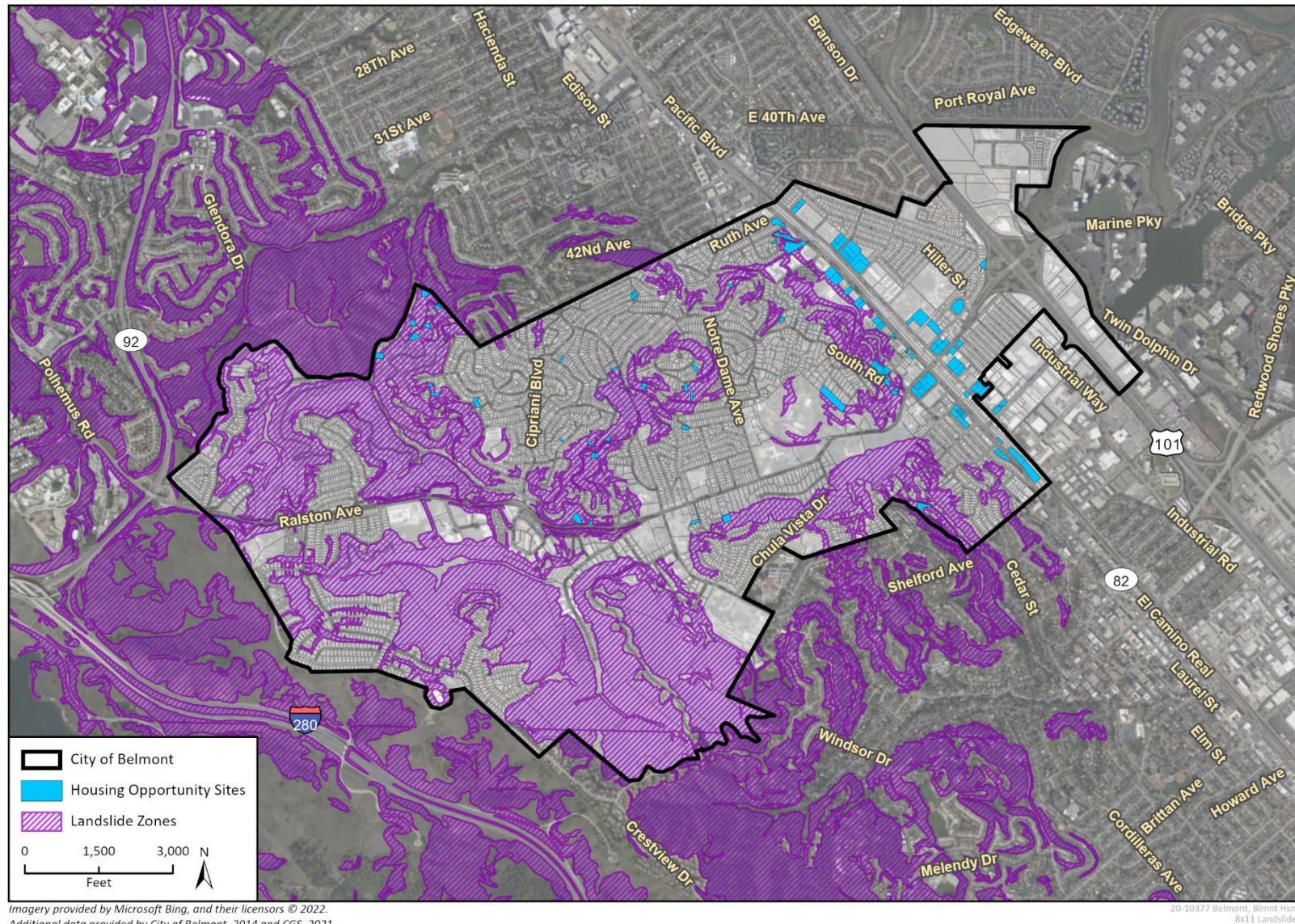
Draft Housing Opportunity Site Number	Site Address	APN
9	516 El Camino Real	44201040
12	803 Belmont Avenue	44172190
26	510 El Camino Real	44201180
30	500 El Camino Real	44201280
31	564 El Camino Real	44201270
57	n/a	44092110
72	n/a	44241620
79	n/a	44331420
84	n/a	45152640
85	n/a	44173220
86	n/a	44173190
89	2123 Arthur Avenue	44242040
90	2121 Arthur Avenue	44242050
91	n/a	44173210
92	n/a	44173120
95	530 El Camino Real	44201070
97	1543 Winding Way	44112090
98	n/a	43231080
99	3301 Haskins Drive	43221330
100	n/a	43231010

Draft Housing Opportunity Site Number	Site Address	APN
101	n/a	44331300
102	n/a	43221210
103	n/a	43222400
104	n/a	43222360
106	n/a	43222350
108	n/a	43241050
109	n/a	45152610
111	n/a	45152620
112	n/a	45152600
113	n/a	45152120
114	n/a	44043030
115	n/a	45152650
117	n/a	45152660
118	n/a	45152550
119	n/a	43302230
122	n/a	45140410
124	n/a	45152670
125	n/a	44243250
126	n/a	45152700
127	2812 Monte Cresta Drive	43302190
130	0 Ralston Avenue	44260160
131	n/a	43081090
132	n/a	45212120
134	n/a	45090999
135	n/a	44260340
143	n/a	45152630
144	n/a	44173010

Subsidence

Subsidence or settlement can occur from immediate settlement, consolidation, shrinkage of expansive soil, and liquefaction. Immediate settlement occurs when a load from a structure or placement of new fill material is applied, causing distortion in the underlying materials. This settlement occurs quickly and is typically complete after placement of the final load. Consolidation settlement occurs in saturated clay from the volume change caused by squeezing out water from the pore spaces. Consolidation occurs over a period of time and is followed by secondary compression, which is a continued change in void ratio under the continued application of the load. Soils tend to settle at different rates and by varying amounts depending on the load weight or changes in properties over an area, which is referred to as differential settlement. Areas underlain by soft sediments or undocumented fills are most prone to settlement.

Figure 4.6-3 Draft Housing Opportunity Sites within Landslide Zones



Expansive Soils

Expansive soils swell with increases in moisture content and shrink with decreases in moisture content. These soils usually contain high clay content. Foundations for structures constructed on expansive soils require special design considerations. Because expansive soils can expand when wet and shrink when dry, they can cause foundations, basement walls and floors to crack, causing substantial structural damage. As such, structural failure due to expansive soils near the ground surface is a potential hazard. These types of soils can be found throughout the City of Belmont (City of Belmont 2017a).

Soil Erosion

Erosion refers to the removal of soil by water or wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. Depending on how well protected the soil is from these forces, the erosion process can be very slow or rapid. Properties of the soil also contribute to how likely or unlikely it is to erosion. Removal of natural or man-made protection can result in substantial soil erosion and excessive sedimentation and pollution problems in streams, lakes, and estuaries. Construction activities represent the greatest potential cause of erosion. Areas susceptible to erosion would include areas exposed during construction and along the shoreline where soil would be subjected to wave action.

Paleontological Resources

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Geologic Setting

The project area is situated within the Coast Ranges geomorphic province of California (CGS 2002). The Coast Ranges extend about 600 miles from the Oregon border south to the Santa Ynez River in Santa Barbara County and are characterized by numerous north-south-trending peaks and valleys that range in elevation from approximately 500 feet above mean sea level (amsl) to 7,581 feet amsl at the highest summit. The basement rocks of the Coast Ranges include the Jurassic to Cretaceous rocks of the Franciscan Assemblage, which consist of over 55,000 feet of greywacke, greenstone, bluestone, metasedimentary rocks, and ophiolite sequences. During the Mesozoic era and into the Cenozoic era, the area of the present-day Coast Ranges was covered by marine waters, resulting in the thick accumulation of marine and nonmarine shale, sandstone, and conglomerate on the

Franciscan basement rock (Bartow and Nilsen 1990). Later, these deposits were unconformably overlain by Paleocene- to Pliocene-epoch continental shelf marine sedimentary rocks (Norris and Webb 1990). During the Late Miocene epoch to the Late Pliocene epoch, a mountain-building episode occurred in the vicinity of the present-day Coast Ranges, resulting in their uplift above sea level. Subsequently, from the Late Pliocene epoch to the Pleistocene epoch, extensive deposits of terrestrial material, including alluvial fans and fluvial sediments, were deposited in the Coast Ranges (Norris and Webb 1990). Ongoing tectonic deformation and sea level change related to Pleistocene climate fluctuations continued through the Quaternary Period, resulting in the formation of marine terrace platforms along the Coast Ranges (Norris and Webb 1990).

The City includes ten geologic units mapped at the ground surface, including Holocene artificial fill (af), Quaternary young (Holocene) bay mud (Qhbm); Quaternary young (Holocene) alluvial fan and fluvial deposits (Qhaf); Quaternary (Pleistocene) alluvial fan and fluvial deposits (Qpaf); Tertiary (middle and lower Eocene) Whiskey Hill Formation (Tw); Mesozoic (Cretaceous) sheared rock (fsr); Mesozoic (Cretaceous and/or Jurassic) Serpentinite (sp); Mesozoic (Jurassic) chert (fc); Mesozoic (Jurassic) sandstone (fs); Mesozoic (Jurassic) greenstone (fg) (Brabb 1998). Figure 4.6-4 depicts the geologic units mapped within the City limits.

HOLOCENE ARTIFICIAL FILL (AF)

Holocene artificial fill, mapped sporadically throughout Belmont, consists of loose to very well consolidated gravel, sand, silt, clay, rock fragments, organic matter, and man-made debris in various combinations. The thickness of this unit is variable and may exceed 30 meters in certain locations (Brabb 1998). A review of the museum records maintained in the University of California Museum of Paleontology (UCMP) and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Holocene artificial fill in San Mateo County (Paleobiology Database 2021; UCMP 2021).

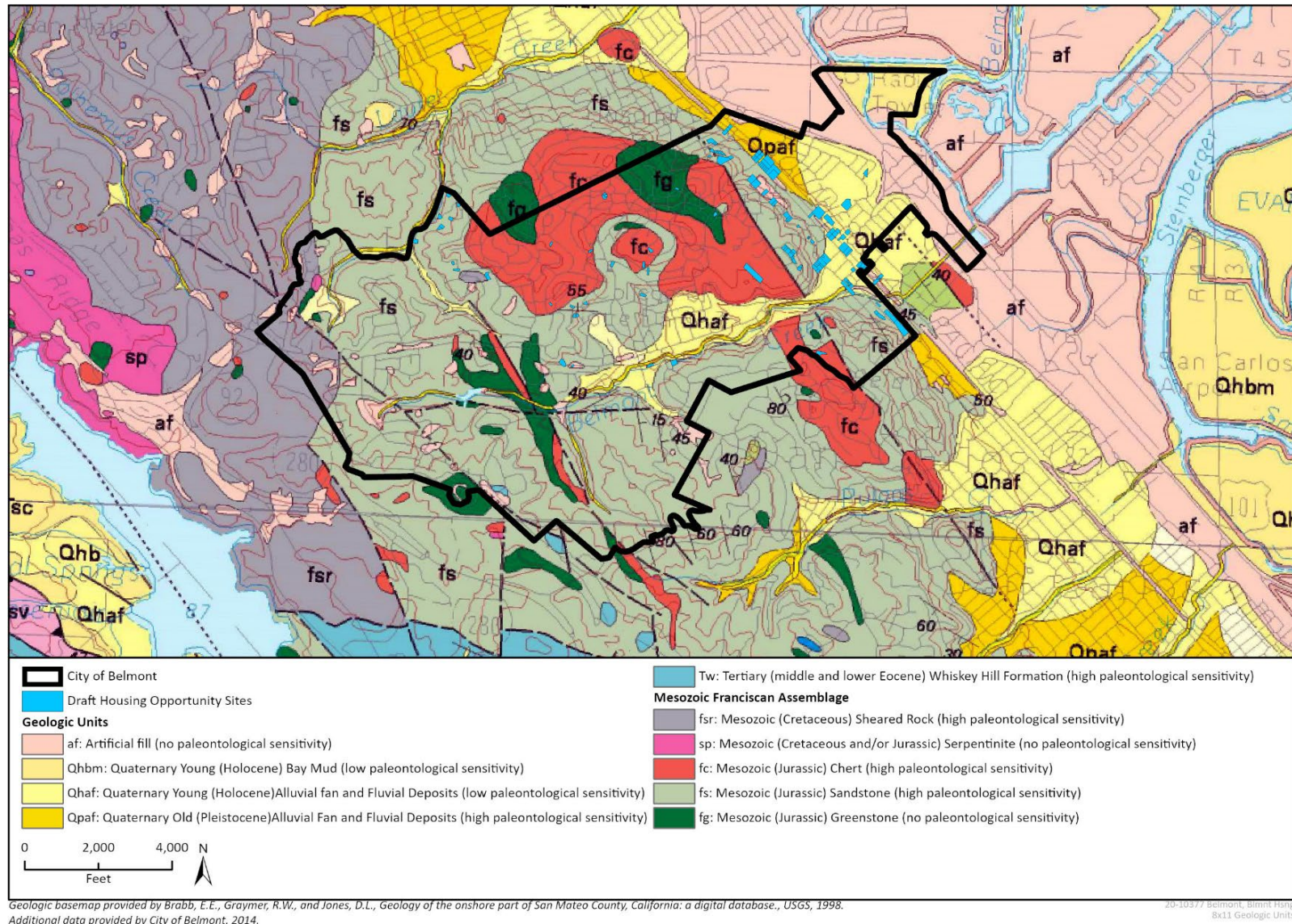
QUATERNARY YOUNG (HOLOCENE) BAY MUD (QHBM)

Quaternary young (Holocene) bay mud (Qhbm), mapped in the northeastern corner of the City of Belmont, consists of water-saturated estuarine mud; with gray, green and blue mud and contains lenses of sand, silt, shell deposits, and peat (Brabb 1998). Quaternary young (Holocene) Bay Mud varies in thickness up to 40 meters north San Mateo County Line (Brabb 1998). A review of the museum records maintained in the UCMP and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Quaternary young (Holocene) bay mud (Qhbm) deposits in San Mateo County (Paleobiology Database 2021; UCMP 2021).

QUATERNARY YOUNG (HOLOCENE) ALLUVIAL FAN AND FLUVIAL DEPOSITS (QHAF)

Quaternary young (Holocene) alluvial fan and fluvial deposits (Qhaf), mapped continuously in central Belmont to the eastern border of the City, consist of brown or tan, medium dense to dense, gravely sand, or sandy gravel that generally grades upward to sandy or silty clay. Near the distal fan edges, the fluvial deposits are typically brown, never reddish, medium dense sand that fines upward to sandy or silty clay (Brabb 1998). A review of the museum records maintained in the UCMP and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Quaternary young (Holocene) alluvial fan and fluvial deposits (Qhaf) in San Mateo County (Paleobiology Database 2021; UCMP 2021).

Figure 4.6-4 Geologic Units and Paleontological Sensitivity Within the City of Belmont



QUATERNARY OLD (PLEISTOCENE) ALLUVIAL FAN AND FLUVIAL DEPOSITS (QPAF)

Quaternary old (Pleistocene) alluvial fan and fluvial deposits (Qpaf), mapped in northern Belmont, consist of brown dense gravely and clayey sand or clayey gravel that fines upwards to a sandy clay. The deposits have variable sorting and contain fossils of freshwater mollusks and extinct late Pleistocene vertebrates. Lower parts of the fan are overlain by Holocene deposits, higher parts are incised by channels that are partially filled with Holocene deposits (Brabb 1998). A desktop search for Quaternary old alluvial fan deposits resulted in 13 Pleistocene vertebrate localities reported throughout San Mateo County. UCMP localities (V3505, V3606, V4018, V6203, V6319, V6422, V74164, V81094, V83054, V83098, V92009, V92100, V99892) produced numerous species including fossil specimens of bison (*Bison*), Columbian bison (*Bison latifrons*), bird (*Aves*), murre (*Uria aalge*), mammoth (*Mammuthus*), Columbian mammoth (*Mammuthus columbi*), camel (*Camelops hesternus*), horse (*Equus*) giant ground sloth (*Glossotherium harlani*), and sea otter (*Enhydra*) (UCMP 2021).

TERTIARY (MIDDLE AND LOWER EOCENE) WHISKEY HILL FORMATION (Tw)

Tertiary Whiskey Hill Formation (Tw), mapped in a small portion along the southwest border of Belmont, consists of light gray to buff coarse-grained arkosic sandstone, light-gray to buff silty claystone, and tuffaceous siltstone. The formation is up to 900 meters thick (Brabb 1998). A review of the museum records maintained in the UCMP and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Tertiary Whiskey Hill Formation in San Mateo County (Paleobiology Database 2021; UCMP 2021). However, 11 UCMP localities yielded various microfossils, including foraminifera, throughout San Mateo and Santa Clara counties (UCMP 2021).

MESOZOIC FRANCISCAN ASSEMBLAGE (FSR, SP, FC, FS, FG)

The Franciscan Assemblage includes late Mesozoic terrane of heterogeneous rocks found throughout the California Coast Ranges, and particularly on the San Francisco Peninsula.

MESOZOIC (CRETACEOUS) SHEARED ROCK (FSR)

Mesozoic (Cretaceous) sheared rock (fsr), mapped along the northwestern portion of the City, consists of graywacke, siltstone, and shale. The total thickness of the unit is estimated to be in the tens-of-meters thick (Brabb 1998). A desktop search for Cretaceous deposits resulted in no vertebrate localities in San Mateo County (UCMP 2021, Paleobiology Database 2021). A review of the museum records maintained in the UCMP and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Mesozoic (Cretaceous) sheared rock (fsr) deposits in San Mateo County (Paleobiology Database 2021; UCMP 2021). Although occurrence of vertebrate fossils has not been previously reported in peer-reviewed literature or museum records, the lithology and age of these Mesozoic (Cretaceous) sedimentary deposits would indicate that this rock unit may be conducive for the preservation of paleontological resources.

MESOZOIC (CRETACEOUS AND/OR JURASSIC) SERPENTINITE (SP)

Mesozoic (Cretaceous and/or Jurassic) serpentinite (sp), mapped in a small area of the northwest corner (Figure 4.6-4) consists of greenish-gray to bluish-green and sheared serpentinite. Blocks are typically less than three meters in diameter, but range in size from several centimeters to several meters (Brabb 1998). The high-heat and high-pressure conditions in which these rocks formed are not suitable for life or fossilization.

MESOZOIC (JURASSIC) CHERT (FC)

Mesozoic (Jurassic) chert (fc) is extensively mapped throughout the City. The chert is white, green, red, and orange. It is interbedded with reddish-brown shale in some places. The chert and shale form lenticular bodies as much as 75 meters thick (Brabb 1998). A review of the museum records maintained in the UCMP and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Jurassic Chert (fs) deposits in San Mateo County (Paleobiology Database 2021; UCMP 2021). However, fossil specimens of Mesozoic marine reptiles, including plesiosaur (*Plesiosaurus hesternus*) and ichthyosaur (*Ichthyosaurus californicus*; *Ichthyosaurus franciscanus*) were reported in neighboring counties (Hilton 2003).

MESOZOIC (JURASSIC) SANDSTONE (FS)

Mesozoic (Jurassic) sandstone (fs), mapped extensively within the City limits, consists of greenish-gray to buff, fine-to coarse-grained sandstone with interbedded siltstone and shale (Brabb 1998). A review of the museum records maintained in the UCMP and Paleobiology online collections databases did not result in records of vertebrate fossil localities from Jurassic Sandstone (fs) deposits in San Mateo County (Paleobiology Database 2021; UCMP 2021). Although occurrence of vertebrate fossils has not been previously reported in peer-reviewed literature or museum records, the lithology and age of these Mesozoic (Jurassic) sedimentary deposits would indicate that this rock unit may be conducive for the preservation of paleontological resources.

MESOZOIC (JURASSIC) GREENSTONE (FG)

Mesozoic (Jurassic) greenstone (fg), mapped sporadically within the City limits, consists of dark-green to red basaltic rocks, including lava flows, pillow lavas, tuff breccias, and some intrusive rocks (Brabb 1998). The high-heat and high-pressure conditions in which these rocks formed are not suitable for life or fossilization.

4.6.2 Regulatory Setting

a. Federal Regulations

U.S. Geological Survey Landslide Hazard Program

The USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a State and local responsibility. In San Mateo County, plans and programs designed for the protection of life and property are coordinated by the San Mateo County Office of Emergency Services.

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by

the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB). The City of Belmont is located within the San Francisco Bay RWQCB jurisdiction.

Projects within the City that disturb more than one acre are required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing best management practices (BMP) the discharger would use to prevent and retain storm water runoff and to prevent soil erosion.

b. State Regulations

California Building Code

The California Building Code (CBC) is contained in the California Code of Regulations, Title 24, Part 2, which is a portion of the California Building Standards Code. Title 24 is assigned to the California Building Standards Commission, which by law is responsible for coordinating all building standards. The CBC incorporates by reference the federal Uniform Building Code with necessary California amendments. The CBC is the regulatory tool that includes building code standards to address geologic and seismic hazards. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971, magnitude 6.6 San Fernando earthquake. The Act provides a mechanism for reducing losses from surface fault rupture on a Statewide basis. The intent of the Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

The Alquist-Priolo Earthquake Fault Zoning Act regulates development near the surface traces of active faults to mitigate the hazard of surface fault rupture. Essentially, this Act contains two requirements: (1) it prohibits the location of most structures for human occupancy across the trace of active faults; and (2) it establishes Earthquake Fault Zones and requires geologic/seismic studies of most proposed development within 50 feet of the zone. The Earthquake Fault Zones are delineated and defined by the State Geologist and identify areas where potential surface rupture along a fault could occur.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (the Act) of 1990 was passed into law following the destructive October 17, 1989, magnitude 6.9 Loma Prieta earthquake. The Act directs the CGS to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards, such as liquefaction, landslides, amplified ground shaking, and inundation by tsunami or seiche. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Act requires that site-specific geotechnical

investigations be performed prior to permitting most urban development projects within seismic hazard zones. CGS maintains these required maps.

California Public Resources Code

Public Resources Code Section 5097.5 states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Here “public lands” means those owned by, or under the jurisdiction of, the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, and for permit actions (e.g., encroachment permits) undertaken by others.

c. Local Regulations

San Mateo County Hazard Mitigation Plan

The San Mateo County Hazard Mitigation Plan, adopted July 2016, assesses the County’s vulnerabilities to various hazards and presents mitigation strategy, including goals, objectives, and actions that the County will strive to implement over the next five years. These hazards include earthquakes and landslides. The hazard mitigation plan seeks to identify opportunities for reasonable mitigation actions and sets out a five-year implementation plan.

City of Belmont General Plan

The City of Belmont General Plan (City of Belmont 2017b) includes a section regarding protection from geologic hazards, which include seismic hazards such as fault movement, ground shaking, ground failure, ground displacement, secondary effects of earthquakes, landslide, and expansive soils, including:

Policy 3.4-6: Locate, design, and landscape new roadways to preserve the beauty of the area, prevent erosion, and help shield residents from noise and air pollution. To the extent possible, retain trees and vegetative cover and minimize grading.

Policy 4.4-3: Consistent with the San Juan Hills and Western Hills area plans, cluster development in the hillside areas of western Belmont in order to maintain contiguous habitat areas, minimize grading, and limit exposure to steep slopes and other sensitive areas.

Policy 5.2-1: Encourage the retention of areas that are hazardous to public safety and welfare as undeveloped open space, including steep hillsides unsuitable for development as identified in area plans and other detailed geotechnical studies; hydrological areas of concern; areas of geological instability; and appropriate setback areas on either side of known active fault traces.

Goal 5.12 Preserve and protect areas and sites of prehistoric, cultural, and archaeological significance.

Policy 5.12-1: Ensure that development avoids potential impacts to sites suspected of being archeologically, paleontologically, or culturally significant, tribal, or otherwise, or of concern by requiring appropriate and feasible mitigation.

Action 5.12-1a: Establish guidelines and mitigation programs when sites of archaeological, paleontological, and/or cultural concern, tribal or otherwise, would be disturbed by development, including:

- Requiring a records review for development proposed in areas that are considered archaeologically or paleontologically sensitive.
- Determining the potential effects of development and construction on archaeological or paleontological resources (as required by CEQA).
- Requiring pre-construction surveys and monitoring during any ground disturbance for all development in areas of historical and archaeological sensitivity.
- Implementing appropriate measures to avoid the identified impacts, as conditions of project approval.

Policy 5.12-2: If cultural, archaeological, paleontological, or cultural resources, tribal or otherwise, are discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected until evaluation by a qualified professional is completed.

- A qualified archaeologist or paleontologist must make an immediate evaluation and outline avoidance measures, or appropriate mitigation should be completed, according to CEQA Guidelines.
- Use the State Office of Historic Preservation's recommendations for the preparation of Archaeological Resource Management Reports as guidelines.

Goal 6.1 Minimize risks of property damage and personal injury posed by geologic and seismic hazards.

Policy 6.1-1: Continue to maintain and enforce appropriate standards to ensure new development is designed to meet current safety codes and requirements associated with seismic activity. Require public and private development to be located, designed, and constructed to minimize the risk of loss of life and injury in the event of a major earthquake or other natural disaster.

Policy 6.1-2: Continue to regulate development, including remodeling or structural rehabilitation, to ensure adequate mitigation of safety hazards on sites having a history or threat of seismic dangers, erosion, landslides, or shrink swell.

Policy 6.1-3: Prohibit development in areas at risk of landslides or high or very high liquefaction as shown in Figure 6-1, or on slopes steeper than 30 percent, unless detailed site investigations by licensed engineers ensure that risks do not exist, or can be reduced to acceptable levels and the structure will be protected for its expected life.

- Policy 6.1-4:** Continue to require geotechnical site analysis for proposed development on sites as specified in the Municipal Code, prior to allowing site development.
- Policy 6.1-5:** Geotechnical studies shall identify any geologic hazards affecting the proposed project site, any necessary mitigation measures, and a statement of the site's suitability for the proposed development and whether or not it will be safe from geologic hazard for its expected life. The study shall identify net developable areas, if any, based on landslide or ground shaking potential or erosion risk. Impacts from the development, such as those resulting from increased water runoff, shall also be determined. Such studies must be signed by a licensed Certified Engineering Geologist or Geotechnical Engineer and are subject to review and approval by City staff and/or contracted employees.
- Policy 6.1-6:** Require any geotechnical studies to include the study of expansive and creeping soils, as well as analysis of erosion, seismic, and other geotechnical hazards, and make recommendations, as warranted.
- Policy 6.1-7:** Prohibit mitigation measures for potential geotechnical hazards if those measures could adversely affect surrounding property, including the use of public rights-of way, or adversely affect public health, safety, and welfare.
- Policy 6.1-8:** Ensure consideration of seismic and geologic hazards at the earliest possible point in the development process, preferably before comprehensive engineering work has commenced.
- Policy 6.1-9:** Require real estate transactions, development approval processes, and property titles to declare known or suspected seismic or geologic hazards on a property, including areas suspected of high or very high risk of liquefaction, shrink swell, or landslide.
- Policy 6.1-10:** Identify and catalogue structures that may be subject to serious structural damage in the event of a major earthquake, such as unreinforced masonry and soft story buildings, and provide information to property owners on ways to pay for rehabilitation of existing buildings.
- Policy 6.1-11:** Support erosion prevention of hillside areas at risk of landslide, as identified in Figure 6-1, by revegetation or other acceptable methods.

4.6.3 Impact Analysis

a. Methodology and Thresholds of Significance

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to geology and soils are considered significant if implementation of the proposed project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault
 - b. Strong seismic ground shaking
 - c. Seismic-related ground failure, including liquefaction
 - d. Landslides
2. Result in substantial soil erosion or the loss of topsoil
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirectly risks to life or property
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

To determine the uniqueness of a given paleontological resource, it must first be identified or recovered (i.e., salvaged). CEQA does not define “a unique paleontological resource or site.” However, SVP has defined a “significant paleontological resource” in the context of environmental review as follows:

Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are typically older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years) (SVP 2010).

Paleontological Resources Sensitivity

Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits within which fossils are buried and physically destroy the fossils. Since fossils are the remains of prehistoric animal and plant life, they are nonrenewable. Such impacts have the potential to be significant and, under the *CEQA Guidelines*, may require mitigation. Sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity

is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The discovery of a vertebrate fossil locality is of greater significance than that of an invertebrate fossil locality, especially if it contains a microvertebrate assemblage. The recognition of new vertebrate fossil locations could provide important information on the geographical range of the taxa, their radiometric age, evolutionary characteristics, depositional environment, and other important scientific research questions. Vertebrate fossils are almost always significant because they occur more rarely than invertebrates or plants. Thus, geological units having the potential to contain vertebrate fossils are considered the most sensitive.

The SVP outlines in its Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area. The SVP (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrates or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Significant paleontological resources are fossils or assemblages of fossils, which are unique, unusual, rare, uncommon, diagnostically, or stratigraphically, taxonomically, or regionally. The paleontological sensitivity of the project site has been evaluated according to the following SVP (2010) categories, which are presented below.

High Potential (Sensitivity)

Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include but are not limited to, sedimentary formations and some volcanic formations which contain significant nonrenewable paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than recent, including deposits associated with nests or middens, and areas that may contain new vertebrate deposits, traces, or trackways are also classified as significant. Full-time monitoring is typically recommended during any project-related ground disturbance in geologic units with high sensitivity.

Low Potential (Sensitivity)

Sedimentary rock units that are potentially fossiliferous but have not yielded fossils in the past or contain common and/or widespread invertebrate fossils of well documented and understood taphonomic (processes affecting an organism following death, burial, and removal from the ground), phylogenetic species (evolutionary relationships among organisms), and habitat ecology. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potentials for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations.

Undetermined Potential (Sensitivity)

Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed.

No Potential

Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources. For geologic units with no sensitivity, a paleontological monitor is not required.

City of Belmont Existing Paleontological Setting

Mesozoic igneous rocks (sp, fg), mapped sporadically throughout Belmont, have no paleontological sensitivity since the physical parameters of their formation are not conducive to fossil preservation. In addition, previously disturbed sediments associated with prior development (i.e., artificial fill [af]) lack taphonomic and other important scientific data and, as such, are also assigned no paleontological sensitivity.

Quaternary old (Pleistocene) alluvial fan and fluvial deposits (Qpaf), Tertiary (middle and lower Eocene) Whiskey Hill Formation (Tw) are assigned a high paleontological sensitivity because they have proven to yield vertebrate fossils throughout San Mateo County (Hilton 2003; Paleobiology Database 2021; UCMP 2021). Although occurrence of vertebrate fossils has not been previously reported in peer-reviewed literature or museum records, the lithology and age of the sedimentary units of the Mesozoic Franciscan Assemblage; including Cretaceous sheared rock (fsr), Jurassic chert (fc), and Jurassic sandstone (fs); would indicate that these rock units may be conducive for the preservation of paleontological resources. Therefore, sedimentary units of the Mesozoic Franciscan Assemblage (fsr, fc, and fs) are also assigned a high paleontological sensitivity.

Quaternary young (Holocene) sedimentary deposits (Qhbm, Qhaf) are too young to preserve fossil resources as defined by SVP standards (2010) (i.e., deposits that are less than 5,000 years old cannot, by definition, contain fossils). Holocene sedimentary deposits are assigned a low paleontological sensitivity at the surface; however, these units grade downward into older, potentially fossiliferous deposits of Pleistocene age (e.g., Qpaf) at unknown depths, that can only be estimated, based on regional geologic setting in the absence of additional data. Accurately assessing the boundaries between younger and older units within the City is generally requires site-specific stratigraphic data, some form of radiometric dating, or fossil analysis from nearby sites.

Conservative estimates of the depth at which paleontologically sensitive units may occur reduces potential for impacts to paleontological resources. The depths at which these units become old enough to yield fossils is highly variable, but generally does not occur at depths of less than 10 feet throughout most of the San Francisco Peninsula. Sensitive units could occur at depths shallower than 10 feet on basin margins and near contact points with high sensitivity units. Pleistocene sedimentary deposits have a well-documented record of abundant and diverse vertebrate fauna throughout California (Jefferson 2010; Paleobiology Database 2021; UCMP 2021). Therefore, areas mapped as Quaternary young (Holocene) sedimentary deposits (Qhbm, Qhaf) are assigned a high paleontological sensitivity at depths greater than 10 feet.

For the purposes of this EIR, an activity that may destroy scientifically significant paleontological resources as defined above would result in a significant impact.

Impact Analysis and Mitigation Measures

Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
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Impact GEO-1 THERE ARE NO DRAFT HOUSING OPPORTUNITY SITES LOCATED WITHIN AN ALQUIST PRIOLO EARTHQUAKE FAULT ZONE, AND THEREFORE DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE SUBSTANTIAL ADVERSE EFFECTS INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT. THERE WOULD BE NO IMPACT.

None of the Draft Housing Opportunity Sites are located within or near Alquist Priolo Earthquake Fault Zones as shown in Figure 4.6-1. Therefore, development facilitated by the project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?
Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?
Threshold:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact GEO-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN EXPOSURE OF PEOPLE OR STRUCTURES TO A RISK OF LOSS, INJURY, OR DEATH FROM SEISMIC EVENTS. DEVELOPMENT FACILITATED BY THE PROJECT COULD BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE OR COULD BECOME UNSTABLE RESULTING IN ON OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE. WITH COMPLIANCE OF APPLICABLE LAWS AND REGULATIONS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would result in additional residents who would be potentially exposed to the effects of fault rupture, seismic ground shaking, liquefaction, and landslides from local and regional earthquakes. Structures that would-be built-in landslide zones would be exposed to an existing risk of landslide or if improperly constructed could exacerbate existing landslide conditions, especially on Draft Housing Opportunity Sites shown in Figure 4.6-3 and listed in Table 4.6-2 which are located in areas vulnerable to landslide hazard. New structures could also experience substantial damage during seismic ground shaking events, particularly on Draft Housing Opportunity Sites shown in Figure 4.6-2 and listed in Table 4.6-1. Development on the Draft Housing Opportunity Sites would be required to be built to current seismic standards that

could better withstand the adverse effects of strong ground shaking. Potential structural damage and the exposure of people to the risk of injury or death from structural failure would be minimized by compliance with CBC engineering design and construction measures. Foundations and other structural support features would be required to be designed to resist or absorb damaging forces from strong ground shaking and liquefaction. Under the proposed project, rezoning would allow for the maximum allowable building height along the El Camino Real corridor sites as shown in Figure 2-4 of Section 2, *Project Description*, to increase to 65 feet. The increase in allowable height could result in foundations and other structural support features to be more robust to support the additional height; however, compliance with CBC regulations would ensure that the buildings would meet seismic safety standards.

In addition to compliance with mandatory CBC requirements, implementation of General Plan goals and policies, and implementation of would further reduce the potential for loss, injury, or death following a seismic event. Adherence to General Plan goals and policies listed in Section 4.6.2, *Regulatory Setting*, would help to reduce seismic hazards.

Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for loss, injury, or death following a seismic event and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?
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Impact GEO-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCLUDE GROUND DISTURBANCE SUCH AS EXCAVATION AND GRADING THAT WOULD RESULT IN LOOSE OR EXPOSED SOIL. DISTURBED SOIL COULD BE ERODED BY WIND OR DURING A STORM EVENT, WHICH WOULD RESULT IN THE LOSS OF TOPSOIL. ADHERENCE TO PERMIT REQUIREMENTS AND CITY REGULATIONS WOULD ENSURE THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water.

Construction activities that disturb one or more acres of land surface are subject to NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the SWRCB. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require preparation of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. As described in Section 4.9, *Hydrology and Water Quality*, development on Draft Housing Opportunity Sites would be subject to the applicable NPDES Municipal Separate Storm Sewer System Permit (MS4) Permit (Municipal Permit Order No. R9-2015-0049, NPDES Permit No. CAS612008) which requires measures to reduce and eliminate stormwater

pollutants, installation of appropriate BMPs to control stormwater runoff from construction sites, and that grading and drainage permits be obtained prior to construction. Grading and drainage plans accompanying the permit application must include BMPs for erosion prevention and sediment control, fencing at waterways and in sensitive areas, and limitation of disturbed areas through temporary features. The permit applications must also demonstrate compliance with NPDES MS4 permit provisions. Enforcement of these permit requirements would reduce soil erosion impacts.

Additionally, Belmont Municipal Code requirements for erosion prevention and sediment control would apply to development facilitated by the project. These include erosion prevention and sediment control in accordance with Chapter 9 of the Belmont Municipal Code, conformance of plans to erosion prevention and sediment control BMPs, grading restrictions during the winter rain period (November 15 through April 15), potential need for water sprinkling equipment on site during grading, and regulations of cut and fill slopes. Adherence to the requirements of the City of Belmont Municipal Code BMPs would reduce the potential for development facilitated by the project to cause erosion or the loss of topsoil by ensuring proper management of loose and disturbed soil.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
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Impact GEO-4 FUTURE SEISMIC EVENTS COULD RESULT IN LIQUEFACTION AND LATERAL SPREADING OF SOILS WITHIN THE CITY. DEVELOPMENT IN THESE AREAS COULD BE SUBJECT TO LIQUEFACTION HAZARDS. COMPLIANCE WITH THE CBC WOULD REDUCE LIQUEFACTION HAZARDS. EXISTING SAFETY ELEMENT POLICIES WOULD APPLY TO DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT IN HAZARD ZONES FOR LIQUEFACTION OR LATERAL SPREADING OF SOILS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project that is constructed on expansive soils could be subject to damage or could become unstable when the underlying soil shrinks or swells. The adverse effects of expansive soils can be avoided through proper subsoil preparation, drainage, and foundation design. In order to design an adequate foundation, it must be determined if the site contains expansive soils through appropriate soil sampling and laboratory soils testing. Expansive soils are identified through expansion tests of samples of soil or rock, or by means of the interpretation of Atterberg limit tests, a standard soils testing procedure. The CBC includes requirements to address soil-related hazards, including testing to identify expansive soils and design specifications where structures are to be constructed on expansive soils. Typical measures to treat expansive soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. Compliance with the requirements of the CBC, as well as relevant General Plan policies (including Policies 6.1-2, 6.1-4, 6.1-5, and 6.1-6), would reduce impacts related to expansive soils to a less-than-significant level, and no mitigation measures would be required.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
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Impact GEO-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD OCCUR ON URBAN SITES THAT WOULD BE SERVED BY EXISTING SANITATION INFRASTRUCTURE. NEW DEVELOPMENT IS NOT ANTICIPATED TO INCLUDE THE USE OF SEPTIC SYSTEMS. THEREFORE, IMPACTS RELATED TO THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would occur in urban areas where existing wastewater infrastructure exists. Therefore, the proposed project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
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Impact GEO-6 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. IMPACTS TO PALEONTOLOGICAL RESOURCES WOULD BE LESS THAN SIGNIFICANT.

Based on a paleontological literature review and existing fossil locality information available on the Paleobiology Database and UCMP database, the paleontological sensitivity of the geologic units underlying the City were determined in accordance with criteria set forth by the SVP (2010).

Development facilitated by the project would have the potential to encounter paleontological resources during ground-disturbing activities associated with construction (e.g., grading, excavation, or other ground disturbing construction activity) in intact (native) geologic units with high paleontological sensitivity. Construction activities on the Draft Housing Opportunity Sites may result in the destruction, damage, or loss of undiscovered scientifically important paleontological resources. However, the Draft Housing Opportunity Sites are mostly on infill sites and in areas that have previously been developed and disturbed and are therefore less likely to contain paleontological resources than undisturbed areas that have not previously been excavated or disturbed below the ground surface. In addition, where suitable geologic units are present, paleontological resources are most likely to occur more than 10 feet below the ground surface. While development facilitated by the project would likely occur on previously disturbed sites, paleontological resources could be impacted when a proposed development would require

excavation of a greater depth than previously disturbed and when located in areas that have been mapped as Qhbm, Qhaf, Qpaf, Tw, fsr, fc, and fs. However, as discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies, or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. The proposed project would include the rezoning of sites identified in Figure 2-4 of Section 2, *Project Description*, along the El Camino Real corridor which would increase the maximum building height to 65 feet. This could result in deeper foundations which would require deeper excavation on the affected Draft Housing Opportunity Sites to support the increased building heights than would be needed under current zoning. However, this would not have a significant impact because the area of ground being disturbed would be the same and the same regulations and policies would be in place to ensure impacts to paleontological resources would remain less than significant. In addition, a number of federal, State, and local regulations protect paleontological resources, including numerous Belmont General Plan policies. For example, all paleontological resources are subject to General Plan policies 5.12-1 and 5.12-2. Policy 5.12-1 ensures that development avoids potential impacts to sites suspected of being paleontologically or significant, or of concern by requiring appropriate and feasible mitigation. This policy requires paleontological resources record searches in areas considered paleontologically sensitive, pre-construction surveying, monitoring of ground-disturbance, and the application of mitigation measures that ensure less-than-significant impacts to paleontological resources. Policy 5.12-2 requires that, upon the unanticipated discovery of paleontological resources, all construction activities must stop until a qualified paleontologist has accessed the discovery and determined the proper mitigation measure (if necessary) required to reduce impacts to a less-than-significant level.

These policies and regulations would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development that could affect paleontological resources, no impact would occur.

With implementation of these General Plan policies, as well as compliance with federal, State, and local regulations, the impact of the development facilitated by the project to paleontological resources would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.6.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative geology and soils impacts is limited to development sites in close proximity to the Draft Housing Opportunity Sites. This geographic scope is appropriate for geology and soils because geology and soils impacts, such as erosion and loss of topsoil, can affect adjacent sites but do not impact regional areas as a whole. Cumulative development within this geographic scope include development envisioned under the City of Belmont General Plan.

Cumulative development would gradually increase population and therefore gradually increase the number of people exposed to potential geological hazards, including effects associated with seismic events such as seismic shaking, liquefaction, and landslides. However, cumulative development projects would be required to conform with the current CBC, the City of Belmont General Plan, and City of Belmont Municipal Code, as well as other laws and regulations mentioned above, ensuring that cumulative impacts associated with seismic shaking, liquefaction, and landslides would be less than significant. Cumulative impacts would be less than significant, and the proposed project would not make a cumulatively considerable contribution to a significant cumulative impact related to seismic hazards.

Cumulative development would also increase ground disturbance in the vicinity of the Draft Housing Opportunity Sites, which would contribute to erosion and loss of topsoil in the area. However, cumulative development projects would be required to obtain coverage under the NPDES Construction General Permit, prepare a SWPPP with site-specific BMPs, and conform with the City of Belmont Municipal Code, as well as the erosion prevention and sediment control requirements. These standard requirements would ensure that cumulative impacts associated with erosion and loss of topsoil would be less than significant. Accordingly, cumulative impacts would be less than significant, and the proposed project would not cause a cumulatively considerable contribution to a significant cumulative impact related to erosion and loss of topsoil.

Compliance with existing State and local laws, regulations, and policies such as the CBC and the City of Belmont General Plan would ensure that the impacts from implementation of the cumulative projects on potentially expansive soil would be minimized by requiring the submittal and review of detailed soils and/or geologic reports prior to construction. Therefore, cumulative impacts resulting from expansive soils would be less than significant, and the project would not have a cumulatively considerable contribution to a significant cumulative impact related to expansive soils.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Existing policies and regulations would continue to apply to development in Belmont and provide the same level of protection as under existing conditions. Although the maximum allowable height on Draft Housing Opportunity Sites identified in Figure 2-4 of Section 2, *Project Description*, would increase and allow buildings up to 65 feet to be built, this would not have a significant impact because the area of ground disturbance would not be increased. Therefore, the project would not considerably contribute to a cumulative impact on paleontological resources.

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4.7 Greenhouse Gas Emissions

This section analyzes impacts to greenhouse gas (GHG) emissions, including the potential for the project to generate greenhouse gas (GHG) emissions in excess of standards or in conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, associated with the implementation of the proposed project.

4.7.1 Setting

a. Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate changes continuously, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed substantial acceleration in the rate of warming during the past 150 years (Intergovernmental Panel on Climate Change [IPCC] 2014). The understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-twentieth century (IPCC 2014).

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it only stays in the atmosphere for a short time and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Both natural processes and human activities emit GHGs. CO₂ and CH₄ are emitted in the greatest quantities from human activities. CO₂ emissions are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Observations of CO₂ concentrations, globally averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. Recently observed increases in CH₄ and N₂O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment used new projections of future climate change that have become more detailed as the models have become more advanced.

Manmade GHGs include fluorinated gases, such as SF₆ many of which have greater heat-absorption potential than CO₂. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHG absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas

emissions, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. CO₂ has a 100-year GWP of one. By contrast, CH₄ has a GWP of 25, meaning its global warming effect is 25 times greater than CO₂ on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth’s temperature. Without the natural heat trapping effect of GHGs, Earth’s surface would be virtually uninhabitable. However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

b. Greenhouse Gas Inventory

Global

Worldwide anthropogenic emissions of GHG were approximately 46,000 million metric tons (MMT or gigaton) of CO₂e in 2010 (IPCC 2014). CO₂ emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010. Of anthropogenic GHGs, CO₂ was the most abundant accounting for 76 percent of total 2010 emissions. CH₄ emissions accounted for 16 percent of the 2010 total, while N₂O and fluorinated gases account for six and two percent, respectively (IPCC 2014).

Federal

Total United States GHG emissions were 6,558.3 MMT of CO₂e in 2019 (United States Environmental Protection Agency [USEPA] 2021). Since 1990 until 2019, total United States emissions have increased by an average annual rate of 0.09 percent, for a total increase of 1.8 percent since 1990. However, emissions decreased by 1.7 percent from 2018 to 2019. The decrease from 2018 to 2019 was a result of multiple factors and reflects a continued shift from coal to natural gas and other non-fossil fuel energy sources in the electric power sector. In 2017, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of GHG emissions while the residential and commercial end-use sectors accounted for 15 percent and 16 percent of GHG emissions, respectively, with electricity emissions distributed among the various sectors.

California

Based on the California Air Resource Board’s (CARB) California GHG Inventory for 2000-2018, California produced 425 MMT of CO₂e in 2018. Transportation is the major source of GHG emissions in California, contributing 40 percent of the state’s total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state’s GHG emissions, and electric power accounts for approximately 15 percent (CARB 2020). California emissions are due in part to its large size and large population compared to other states. In 2016, the State of California achieved its 2020 GHG emission reduction targets as emissions fell below 431 MMT of CO₂e (CARB 2020).

City of Belmont

The City of Belmont released a 2017 Climate Action Plan (CAP) that includes a GHG inventory for 2005-2013, which includes “business-as-usual” emissions forecasts for 2020 and 2035 (City of Belmont 2017b). The CAP established a baseline communitywide GHG inventory for calendar year 2005, in which the City emitted approximately 168 metric tons (MT) of CO₂e. The CAP included a 2013 inventory that showed emissions reduce to approximately 159 MT of CO₂e. Most of the emissions in the baseline year of 2005 were from transportation, accounting for 60 percent of

emissions, while the residential sector accounted for 25 percent and the industrial sector accounted for 13 percent.

c. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature for the decade from 2006 to 2015 was approximately 0.87 degrees Celsius ($^{\circ}\text{C}$; 0.75°C to 0.99°C) higher than the global mean surface temperature over the period from 1850 to 1900. Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations agree that Land-Surface Air Temperature as well as sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2019). While there is scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally specific climate change case studies, including for the greater San Francisco Bay Area region that includes the City of Belmont where the project is located (State of California 2018). Below is a summary of some of the potential effects that could be experienced in California and the San Francisco Bay Area region because of climate change.

Air Quality

Higher temperatures are conducive to air pollution formation and could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the area burned by wildfires has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains (State of California 2019). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks (California Natural Resources Agency 2009).

In the San Francisco Bay Area region, changes in meteorological conditions under climate change will affect future air quality. Hotter future temperatures will act to increase surface ozone concentrations (State of California 2018). Increased wildfires from higher temperatures and more extreme droughts will lead to further air quality degradation during such fires.

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of natural and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. For example, many southern California cities have experienced their lowest recorded annual precipitation twice within the past decade; however, in a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources 2008). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. However, the average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 5.9 inches along the central and southern California coast (State of California 2019). The Sierra snowpack provides most of California's water supply by accumulating snow during wet winters and releasing it slowly during dry springs and summers. A warmer climate is predicted to reduce the fraction of precipitation falling as snow and result in less snowfall at lower elevations, thereby reducing the total snowpack (California Department of Water Resources 2008; State of California 2019). The State of California projects that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from the historical average by 2050 (State of California 2019).

Like the rest of the State, the San Francisco Bay Area is expected to face a challenging combination of decreased water supply and increased water demand (State of California 2018). Melting snowpack, increasing seawater intrusion into groundwater, increasing rates of evapotranspiration, and levee failures or subsidence that contaminate Delta supplies will affect both the quantity of water available and the quality of supplies. Future increases in temperature, regardless of whether total precipitation goes up or down, will likely cause longer and deeper droughts, posing major problems for water supplies, natural ecosystems, and agriculture.

Hydrology and Sea Level Rise

As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Climate change has the potential to induce substantial sea level rise in the coming century (State of California 2019). The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 millimeters per year, which is double the observed twentieth century trend of 1.6 millimeters per year (World Meteorological Organization [WMO] 2013). As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and this rise is expected to

accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise of 10 to 37 inches by 2100 (IPCC 2018). A rise in sea levels could erode 31 to 67 percent of southern California beaches, flooding approximately 370 miles of coastal highways during 100-year storm events, jeopardizing California's water supply due to saltwater intrusion, and inducing groundwater flooding and/or exposure of buried infrastructure (State of California 2019). Increased CO₂ emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

In the San Francisco Bay Area, much of the transportation system (airports, roads, and railways) is concentrated along the bay where flooding from sea level rise and storm surge is a major vulnerability (State of California 2018). The effects of climate change will further exacerbate impacts from sea level rise and storm surge in the region.

Ecosystems and Wildlife

Climate change and potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2019). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2019).

Many of the impacts identified above would impact ecosystems and wildlife in the San Francisco Bay Area region. Increases in wildfire would further remove sensitive habitat; increased severity in droughts would potentially starve plants and animals of water; and sea level rise will affect sensitive coastal ecosystems, especially wetlands.

4.7.2 Regulatory Setting

a. Federal Regulations

Federal GHG Emissions Regulation

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) held that the USEPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that

are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of best available control technology.

Safer Affordable Fuel-Efficient Vehicle Rule

On September 27, 2019, the USEPA and the National Highway Safety Administration published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. To account for the effects of the Part One Rule, CARB released off-model adjustment factors on November 20, 2019, to adjust criteria air pollutant emissions outputs from the EMFAC model. The Final SAFE Rule (i.e., Part Two) then relaxed federal GHG emissions and Corporate Average Fuel Economy standards to increase in stringency at only about 1.5 percent per year from model year 2020 levels over model years 2021-2026 (CARB 2020a). The previously established emission standards and related fuel economy standards would have achieved about four percent per year improvements through model year 2025. Therefore, CARB has prepared off-model CO₂ emissions adjustment factors for both the EMFAC2014 and EMFAC2017 models to account for the impact of the SAFE Vehicles Rule (CARB 2020b). With the incorporation of these adjustment factors, operational emission factors for CO₂ generated by light-duty automobiles, light-duty trucks, and medium-duty trucks associated with project-related vehicle trips may increase by approximately one percent (in 2020) up to as much as 17 percent (in 2050) compared to non-adjusted estimates. These increases would not alter the significance of the operational GHG emissions from development facilitated by the project as discussed further below.

b. State Regulations

California’s Advanced Clean Cars program (Assembly Bill 1493)

Assembly Bill (AB) 1493 (2002), California’s Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve “the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles.” On June 30, 2009, USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as “Low Emission Vehicle III GHG”, regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicle, Zero Emissions Vehicles, and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). The implementation of these rules is currently delayed due to the SAFE Vehicle Rule, described under *Federal Regulations*.

California Global Warming Solutions Act of 2006

California’s major initiative for reducing GHG emissions is outlined in AB 32, the “California Global Warming Solutions Act of 2006,” which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO₂e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG

emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

Senate Bill (SB) 32, signed into law on September 8, 2016, extends AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and policies, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of 6 MT CO₂e by 2030 and 2 MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

Renewables Portfolio Standard Program (Senate Bill 100)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Public Resources Code Sections 21083.05 and 21097 (Senate Bill 97)

SB 97, signed in August 2007, added Section 21083.05 to and repealed Section 21097 from the Public Resources Code (PRC). This bill acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Senate Bill 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 directs each of the State's 18 major Metropolitan Planning Organizations to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. ABAG was assigned targets of a 10 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the ABAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

PRC Division 30 Part 3 Chapter 13.1 and Health and Safety Code Sections 39730.5-8 (Senate Bill 1383)

Adopted in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

1. Methane – 40 percent below 2013 levels
2. Hydrofluorocarbons – 40 percent below 2013 levels
3. Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Executive Order B-55-18

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; diversion of 50 percent of all solid waste on and after January 1, 2000; and diversion of 75 percent of all solid waste by 2020, and annually thereafter. CalRecycle is required to develop strategies to implement AB 341, including source reduction.

California Building Standards Code

The California Code of Regulations, Title 24, is referred to as the California Building Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. The California Building Code's energy efficiency and green building standards are outlined below.

Part 6 – Building Energy Efficiency Standards

The California Code of Regulations, Title 24, Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings to reduce California's energy demand. The Building Energy Efficiency Standards is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC).

The 2019 standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic (PV) systems for single-family homes and multifamily

buildings of three stories and less. The 2019 standards focus on four key areas: (1) smart residential PV systems; (2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); (3) residential and nonresidential ventilation requirements; (4) and nonresidential lighting requirements (CEC 2018a). Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient compared to the 2016 standards, and single-family homes will be 7 percent more energy efficient (CEC 2018b). When accounting for the electricity generated by the solar PV system, single-family homes would use 53 percent less energy compared to homes built to the 2016 standards (CEC 2018b).

2022 Building Energy Standards will become effective at the beginning of 2023 and improve upon the 2019 standards described above. It will include several amendments including revisions to residential energy efficiency standards for solar photovoltaic systems, establish requirements that mixed fuel buildings are electric ready, enhancements of requirements for duct sealing and ventilation, among others (CEC 2021).

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Code). The 2016 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require the following practices:

1. 20 percent reduction in indoor water use relative to specified baseline levels
2. 50 percent construction/demolition waste diverted from landfills
3. Inspections of energy systems to ensure optimal working efficiency
4. Use of low pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards
5. Implementation of dedicated circuitry to facilitate installation of electric vehicle (EV) charging stations in newly constructed attached garages for single-family and duplex dwellings
6. Installation of EV charging stations at least three percent of the parking spaces for all new multi-family developments with 17 or more units

The voluntary standards require the following:

1. Tier I—15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, 10 percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof
2. Tier II—30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent recycled content, 30 percent permeable paving, and 30 percent cement reduction, cool/solar reflective roof

Similar to the compliance reporting procedure for demonstrating Building Energy Efficiency Standards compliance in new buildings and major renovations, compliance with the CALGreen water-reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

c. Local Regulations

Bay Area Air Quality Management District

In 2013, the Bay Area Air Quality Management District (BAAQMD) adopted resolution no. 2013-11, “Resolution Adopting a Greenhouse Gas Reduction Goal and Commitment to Develop a Regional Climate Protection Strategy” that builds on state and regional climate protection efforts by (BAAQMD 2013):

1. Setting a goal for the Bay Area region to reduce GHG emissions by 2050 to 80 percent below 1990 levels
2. Developing a Regional Climate Protection Strategy to make progress towards the 2050 goal, using BAAQMD’s Clean Air Plan to initiate the process
3. Developing a 10-point work program to guide the BAAQMD’s climate protection activities in the near-term

The BAAQMD is currently developing the Regional Climate Protection Strategy and has outlined the 10-point work program, which includes policy approaches, assistance to local governments, and technical programs that will help the region make progress toward the 2050 GHG emissions goal.

The BAAQMD is responsible for enforcing standards and regulating stationary sources in its jurisdiction, including the San Francisco Bay Area Air Basins and all Belmont. The BAAQMD regulates GHG emissions through specific rules and regulations, as well as project and plan level emissions thresholds for GHGs to ensure that new land use development in the San Francisco Bay Area Air Basin contributes to its fair share of emissions reductions (BAAQMD 2017).

City of Belmont 2035 General Plan

The City of Belmont’s 2035 General Plan, adopted in November 2017, lists several GHG-reduction goals, policies, and actions as part of the Conservation Element that supports the goal of reducing GHG emissions. The following goals, policies, and actions are applicable to the proposed project (City of Belmont 2017a):

Action 5.10-3a: Require applicants proposing new development projects within the Planning Area to require their contractors, as a condition of contract, to reduce construction-related GHG emissions by implementing BAAQMD’s recommended best management practices, including (but not limited to) the following measures (based on BAAQMD’s (2011) CEQA Guidelines):

- Use local building materials of at least 10 percent (sourced from within 100 miles of the planning area).
- Recycle and reuse at least 50 percent of construction waste or demolition materials.

Goal 5.11 Reduce emissions of greenhouse gases to 15 percent below the 2005 baseline levels by 2020 and to 50 percent below the 2005 baseline levels by 2035.

Policy 5.11-1: Adopt a Climate Action Plan that incorporates a Greenhouse Gas Emissions Reduction Plan, which quantifies current and anticipated future emissions and focuses on feasible actions the City can take to minimize the adverse impacts of General Plan implementation on climate change and air quality.

Action 5.11-1a: Maintain an inventory of greenhouse gas emissions from City operations and track related solid waste, energy, economic, and environmental data. Update the inventory periodically as additional data and methodologies become available.

Policy 5.11-2: Support the Climate Action Plan's goals and implement the CAP's reduction measures and strategies to reduce greenhouse gas emissions.

Action 5.11-2a: Support local actions that will reduce motor vehicle use, support alternative forms of transportation, improve energy efficiency, require energy conservation in new construction, and manage energy in public buildings, in accordance with State law.

Action 5.11-2b: Periodically monitor and report the City's progress in reducing greenhouse gas emissions and meeting State targets.

Policy 5.11-4: Support and participate in regional efforts to reduce greenhouse gas emissions and implement adaptation strategies.

City of Belmont Climate Action Plan – 2017

The City of Belmont adopted a Climate Action Plan (CAP) to demonstrate environmental leadership, promote a green economy, comply with broader California environmental initiatives, and promote sustainable development (City of Belmont 2017b). The CAP includes a GHG inventory and forecast, reduction targets for 2035, quantified reduction strategies and standards, an implementation framework, and monitoring efforts. The CAP's greenhouse gas reduction target for 2035 is 50 percent below 2005 levels, which would require reducing emissions by 115,471 MT CO₂e (City of Belmont 2017b). Section 3 of the CAP lays out various Climate Action Strategies, which are quantified in terms of GHG emissions. The CAP sets out the following goals and measures:

Goal 3.1.1: Increase municipal, residential, and commercial energy efficiency, renewable energy, efficient water use, and green building.

Goal 3.2.1: Reduce emissions from transportation through efficient land use, alternate modes of transportation, and operational innovations.

Goal 3.3.1: Reduce solid waste generated and sent to landfills.

Considering that all measures that were implemented to achieve these goals related to residential use are quantified in terms of MMT of CO₂e, they are all considered here.

- **Measure EC2:** Update CALGreen for residential buildings triennially. Work to mandate achievement of CALGreen Tier 1 energy performance.
- **Measure EC3:** Provide financial incentives for solar PV and hot water system installation.
- **Measure EC4:** Provide or encourage residential energy audits and retrofits. Leverage existing rebates/add additional rebates for energy efficient retrofits.

- **Measure EC6:** Continue to be part of the Peninsula Clean Energy (PCE) Community Choice Aggregation (CCA) Program and continue to opt for the ECO100 option (100 percent renewable energy) for all City facilities.
- **Measure EM2:** Implement a sustainable purchasing policy that emphasizes recycled materials and Energy Star equipment.
- **Measure EM4:** Complete feasibility study on the installation of solar or other renewable energy projects at City facilities and install where feasible. Set a goal for renewable energy purchase if installation is not feasible.
- **Measure EM5:** Participate in San Mateo County Energy Watch and leveraged benchmarking to identify EE audit and retrofit projects and track energy performance.
- **Measure TL1:** Establish a Smart Growth Policy that prioritizes infill, higher density, transit-oriented and mixed-use development.
- **Measure TM1:** Prioritize purchase of efficient vehicles and alternative fuel vehicles (including off-road equipment). Maintain existing vehicles for optimum mileage. Encourage staff to drive minimally and efficiently. Establish government operations idling policy.
- **Measure WC1:** Increase participation in recycling programs and ensure weekly collection of recyclables and organic waste
- **Measure WC4:** Increase diversion/recycling of yard waste by landscapers and landscape maintenance businesses and food scraps by residents and businesses. Explore a ban on these organics from landfill.

Plan Bay Area

Plan Bay Area 2040¹ is a state-mandated, integrated long-range transportation, land-use, and housing plan that would support a growing economy, provide more housing and transportation choices and reduce transportation-related pollution in the nine-county San Francisco Bay Area (Association of Bay Area Governments [ABAG] 2017). The SCS builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2040 would be updated every four years to reflect new priorities. A goal of the SCS is to “reduce vehicles miles traveled (VMT) per capita by 10 percent” (ABAG 2017). The Metropolitan Transportation Commission’s (MTC) Climate Initiatives Program key goals are to reduce transportation related emissions and vehicle miles traveled and encourage the use of cleaner fuels, which would reduce regional GHG emissions.

4.7.3 Impact Analysis

a. Thresholds of Significance

To determine whether a project would result in a significant impact to air quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs

¹ Although Plan Bay Area 2050 was completed and approved in October 2021, the data used in all of the analyses and projections were not broken down by individual jurisdiction. As a result, this environmental evaluation uses data supplied by the Plan Bay area 2040 report.

Individual projects do not generate enough GHG emissions to create significant project-specific environment effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (*CEQA Guidelines* Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]).

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions. *CEQA Guidelines* Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see *CEQA Guidelines* Section 15064.7[c]).

In the BAAQMD 2017 *CEQA Air Quality Guidelines*, the BAAQMD outlines an approach to determine the significance of projects. The BAAQMD recommends that lead agencies determine appropriate GHG emissions thresholds of significance based on substantial evidence in the record. The BAAQMD has not established a quantitative significance threshold for evaluating construction-related emissions. The following significance thresholds established in the BAAQMD 2017 *CEQA Air Quality Guidelines* for operational GHG emissions from land use development projects within the San Francisco Bay Area Air Basin are the most appropriate thresholds for use in determining the significance of project-level or plan-level impacts (BAAQMD 2017):

1. Project-level
 - a. Compliance with a qualified GHG reduction strategy
 - b. Annual emissions less than 1,100 MT of CO₂e per year
 - c. Annual emissions less than 4.6 MT of CO₂e per service population (residents and employees) per year
2. Plan-level
 - a. Compliance with a qualified GHG reduction strategy
 - b. Annual emissions less than 6.6 MT of CO₂e per service population (residents and employees) per year

However, the BAAQMD's thresholds of significance were established based on achieving the 2020 GHG emission reduction targets set forth in the AB 32 Scoping Plan, and not the 2030 reduction targets of the SB 32 Scoping Plan. Therefore, although the BAAQMD has not yet quantified a threshold for 2030, reduction of the per service population thresholds by 40 percent would be consistent with state goals detailed in SB 32. As such, the adjusted per service population thresholds would be 2.8 MT of CO₂e per service population at the project level and 4.0 MT of CO₂e per service population at the plan level. As a Program EIR, this CEQA document analyzes the proposed project from a plan-level perspective since the project would identify Draft Housing Opportunity Sites to be

added to the City's General Plan Housing Element site inventory to comply with State law and will implement current General Plan Policies and Programs that require the City to identify urban sites near jobs and transit which may appropriately accommodate additional housing. As such, the BAAQMD's Plan-level thresholds are applicable, reasonable and appropriate for use in this analysis. In addition, because this document may be used for tiering and/or streamlining of future CEQA review for individual housing sites, the project's GHG emissions are also compared to the BAAQMD's project-level threshold for informational purposes only.

b. Methodology

GHG emissions for development facilitated by the project (construction and operation) were calculated using CalEEMod. The model calculates emissions of the following GHGs: CO₂, N₂O, and CH₄, which are combined using each GHGs' GWP and reported as CO₂e. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide appendices A, D, and E (CAPCOA 2021). GHG emissions include water and solid waste sources and area, energy, and mobile sources. The input data and subsequent construction and operation GHG emission estimates for development facilitated by the project are discussed below and in Section 4.2, *Air Quality*. CalEEMod output files are included in Appendix AQ.

Construction Emissions

Project construction would primarily generate GHG emissions from construction equipment operation on site, construction worker vehicle trips to and from the site, and from export of materials off site. Construction input data for CalEEMod include, but are not limited to, the anticipated start and finish dates of construction activity; inventories of construction equipment to be used; areas to be excavated and graded; and volumes of materials to be exported from and imported to the Draft Housing Opportunity Sites. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Construction equipment estimates are based on surveys of construction projects within California conducted by members of California Air Pollution Control Officers Association (CAPCOA 2021).

The analysis consisted of a modeling the full buildout of development facilitated by the project, which would equal 3,300 residential units. The units were modeled as apartments mid-rise units (three stories or taller). The default construction schedule in CalEEMod was adjusted for the 8-year buildout timeline of the project. The project operational year was considered to be 2030, instead of 2031, considering that reduction targets are based on 2030 thresholds. Default construction equipment was used. Demolition was conservatively assumed to include square footage for all non-vacant Draft Housing Opportunity Sites.

Operational Emissions

Energy Sources

Emissions from energy use include electricity and natural gas use. The emissions factors for natural gas combustion are based on USEPA's AP-42 (*Compilation of Air Pollutant Emissions Factors*) and California Climate Action Registry General Reporting Protocol (2009). Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt-hour (kWh; CAPCOA Software 2021). The electricity consumption values in CalEEMod include the CEC-sponsored California Commercial End Use Survey and Residential Appliance

Saturation Survey studies. CalEEMod currently incorporates California's 2016 Title 24 building energy efficiency standards. The 2019 Title 24 standards are more stringent and would reduce in less electricity consumption than the 2016 standards; for a conservative analysis, no additional reductions were taken over the 2016 Title 24 standards.

Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kWh. Pacific Gas & Electric Company (PG&E) or Peninsula Clean Energy (PCE) would serve development facilitated by the project. Because PCE would be residents default electricity provider, the company's specific energy intensity factors (i.e., the amount of CO₂, CH₄, and N₂O per kWh) were used in the calculations of GHG emissions. Per SB 100, the statewide Renewable Portfolio Standard (RPS) program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030, which PCE is already in compliance with. All of the energy PCE supplies is 100 percent carbon-free, therefore energy intensity factors are zero for all factors considered (PCE 2021).

In accordance with Section 150.1(c)(14) of the 2019 Building Energy Efficiency Standards, development facilitated by the project would be required to install PV systems on all low-rise residential structures up to three stories equal to the expected electricity usage. Some residential structures allowed under the project would have a height maximum of 65 feet, which would be taller than three stories. As such, development facilitated by the project may not include PV systems, so a conservative analysis with CalEEMod assumed that no structures would include PV systems.

Area Sources

Emissions associated with area sources, including space and water heating, consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod and use standard emission rates from CARB, USEPA, and emission factor values provided by the local air district (CAPCOA Software 2021).

Waste Sources

GHG emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CAPCOA Software 2021). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by CalRecycle.

Water and Wastewater Sources

GHG emissions from water and wastewater usage calculated in CalEEMod were based on the electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for northern and southern California. A 20 percent reduction in indoor potable water use was incorporated in the model in accordance with CALGreen standards.

Mobile Sources

Mobile source emissions are generated by the increase in vehicle trips to and from the Draft Housing Opportunity Sites associated with operation of onsite development. Vehicle trips were calculated using the daily trip generation rate of 5.44 provided in the transportation analysis

(Appendix TRA). Mobile emissions also assumed 2030 fleet mixes and emission factors, as this is the year in which the project's development is analyzed against GHG reduction goals.

c. Impact Analysis

Threshold:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
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Impact GHG-1 GHG EMISSIONS FROM DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT EXCEED THE BAAQMD INTERPOLATED 2030 PROJECT-LEVEL OR PLAN-LEVEL THRESHOLDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Full buildout of the project's envisioned increase of 3,300 dwelling units over existing conditions was modeled over an 8-year period to estimate the project's construction GHG emissions. As shown in Table 4.7-1, construction activities associated with development facilitated by the project would generate an estimated 18,932 MT of CO₂e.

Table 4.7-1 Estimated Construction GHG Emissions

Construction Year	Annual Emissions MT of CO ₂ e
2023	771
2024	2,590
2025	3,066
2026	3,007
2027	2,950
2028	2,887
2029	2,848
2030	813
Total	18,932

Source: Appendix AQ

Table 4.7-2 shows the operational GHG emissions associated with development facilitated by the project. As shown therein, annual emissions from full buildout of the project's envisioned increase of 3,300 dwelling units over existing conditions would be 17,661 MT of CO₂e per year. With amortized construction emissions over eight years of the buildout, this would result in a project total of 20,028 MT of CO₂e per year. With a project increase in population of 8,250 over existing conditions, this would result in an increase of 2.43 MT of CO₂e per service population per year, which is partially due to lower per capita vehicle trips and associated GHG emissions that would result from housing placed closer to transit, jobs, services, and open space. This would not exceed the BAAQMD's interpolated 2030 targets 4.0 MT of CO₂e per service population at the plan-level. Therefore, impacts would be less than significant. In addition, for informational purposes only, the project's increase of 2.43 MT of CO₂e per service population per year would also not exceed the BAAQMD's interpolated 2030 target of 2.8 MT of CO₂e per service population per year at the project-level.

Table 4.7-2 Operational GHG Emissions

Emission Source	Annual Emissions (MT of CO ₂ e)
Construction	2,367
Operational	
Area	41
Energy	3,457
Mobile	13,131
Waste	746
Water ¹	286
Operational Total	17,661
Project Total	20,028
Project Service Population Increase	8,250
MT of CO₂e per Service Population	2.43
BAAQMD Interpolated Plan-level 2030 Target	4.0
Exceed BAAQMD Targets?	No

¹ Emissions account for compliance with 2019 CALGreen, which mandates a 20 percent reduction in indoor water use as compared to calculated baseline levels for new residential uses and compliance with the current California Department of Water Resources Model Water Efficient Landscape Ordinance, which requires the use of water-efficient irrigation systems.

Source: Appendix AQ

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
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Impact GHG-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE CONSISTENT WITH THE GOALS OF THE 2017 SCOPING PLAN, PLAN BAY AREA 2040, CITY GENERAL PLAN, AND CITY CLIMATE ACTION PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed project was evaluated for consistency with applicable local and State plans that were developed with the intent of reducing GHG emissions. Each applicable plan is discussed separately below.

2017 Scoping Plan

Development facilitated by the project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards. Development facilitated by the project would be required to include a solar PV system per the 2019 Building Energy Efficiency Standards and energy efficient design and construction per CALGreen. One of the goals of the project is to encourage residential development in urban areas to increase proximity to transit, jobs, services, and open spaces. As discussed in Impact AQ-1 of Section 4.2, *Air Quality*, the net percentage VMT increase associated with the proposed project

(approximately 30 percent) would be less than the net percentage population increase (approximately 97 percent). Therefore, on a per population basis, it would have the effect of reducing vehicle trips and therefore GHG emissions associated with fossil fuel use. Further, most of the Draft Housing Opportunity Sites are located in proximity to transit, jobs, services, and open spaces, which would reduce reliance on personal vehicles. This supports 2017 Scoping Plan goals for the encouragement of alternative transportation use and VMT reduction in SCSs. Therefore, the project would be consistent with the 2017 Climate Change Scoping Plan.

Plan Bay Area 2040

As shown in Table 4.7-3, the development facilitated by the project would be consistent with the key goals of Plan Bay Area 2040 and MTC's Climate Initiatives Program. Therefore, impacts related to consistency with GHG emissions reduction plans would be less than significant.

Table 4.7-3 ABAG/MTC Plan Bay Area 2040 Consistency for GHG Emissions

Policy	Consistency
Housing and Transportation. Lower the share of income spent on housing and transportation costs, lessen displacement risk, and increase the availability of housing affordable to low- and moderate-income households.	Consistent. One of the project's objectives is to better utilize the El Camino Real corridor by encouraging residential development on the Draft Housing Opportunity Sites. Development of additional residences Downtown and in transit corridors would lower transportation costs for residents along El Camino Real. The project also aims to build housing units across all levels of affordability. Therefore, the proposed project would be consistent with Plan Bay Area 2040's Housing and Transportation objective.
Economic Development. Improve transportation access to jobs, increase middle-wage job creation, and maintain the region's infrastructure.	Consistent. One of the main criteria for selecting the Draft Housing Opportunity Sites includes proximity to Downtown jobs, transit, services, and open spaces. By increasing density at these Draft Housing Opportunity Sites, the project would support the goal by increasing the number of residents who live close to alternative transit options to travel to their jobs. The project would also decrease the typical distance those residents would have to travel to Downtown jobs, which would have the effect of reducing GHG emissions compared to existing conditions. Therefore, the proposed project would be consistent with Plan Bay Area 2040's Economic Development objective.
Resilience. Enhance climate protection and adaptation efforts, strengthen open space protections, create healthy and safe communities, and protect communities against natural hazards.	Consistent. By concentrating residences along El Camino Real and in developed infill areas, the project would reduce potential pressure to develop open space areas. By placing residents close to jobs and alternative methods of transportation, the project would reduce GHG emissions and other criteria pollutants associated with vehicle use to help communities stay healthy and safe. Therefore, the proposed project would be consistent with Plan Bay Area 2040's Resilience objective.

Source: ABAG 2017

City of Belmont General Plan 2035

Section 5 of the City of Belmont 2035 General Plan, the Conservation Element contains emissions goals that would have the effect of reducing GHG emissions. As shown in Table 4.7-4, the proposed project would be consistent with these goals, policies, and actions. Therefore, impacts related to consistency with GHG emissions-related goals of the General Plan would be less than significant.

Table 4.7-4 City of Belmont General Plan 2035 Consistency for GHG Emissions

General Plan 2035 Policy or Action	Consistency
<p>Action 5.10-3a: Require applicants proposing new development projects within the Planning Area to require their contractors, as a condition of contract, to reduce construction-related GHG emissions by implementing BAAQMD's recommended best management practices, including (but not limited to) the following measures (based on BAAQMD's (2011) CEQA Guidelines):</p> <ul style="list-style-type: none"> ▪ Use local building materials of at least 10 percent (sourced from within 100 miles of the planning area). ▪ Recycle and reuse at least 50 percent of construction waste or demolition materials. 	<p>Consistent. Development facilitated by the project would comply with BAAQMD's Basic Construction Mitigation Measures, as outlined in Mitigation Measure AQ-1 pursuant to the General Plan EIR Mitigation Measure AQ-4. Individual applicants would be required to work with contractors to implement best management practices related to building materials and recycling/reuse of waste and materials. Therefore, the proposed project would be consistent with this action.</p>
<p>Policy 5.11-2: Support the Climate Action Plan's goals and implement the CAP's reduction measures and strategies to reduce greenhouse gas emissions.</p>	<p>Consistent. As discussed below in Table 4.7-5, the proposed project would implement CAP policies that are relevant to GHG emissions. Therefore, the proposed project would be consistent with this policy.</p>
<p>Action 5.11-2a: Support local actions that will reduce motor vehicle use, support alternative forms of transportation, improve energy efficiency, require energy conservation in new construction, and manage energy in public buildings, in accordance with State law.</p>	<p>Consistent. One of the project's objectives is to develop residences within access of transit, jobs, services, and open spaces, proximity to which would reduce motor vehicle use. The proximity of housing to transit would support alternative forms of transportation. Title 24 has been adopted into the City's municipal code and adherence to those regulations would improve energy efficiency and energy conservation in development facilitated by the project. No public buildings are proposed within the project. Therefore, the proposed project would be consistent with this action.</p>
Source: City of Belmont General Plan	

City of Belmont Climate Action Plan - 2017

Section 3 of the CAP includes strategies with quantifiable GHG emission reductions. As show in Table 4.7-5, development facilitated by the project would be consistent with these goals. Therefore, impacts related to consistency with the City of Belmont CAP resolution would be less than significant.

Table 4.7-5 City of Belmont CAP Consistency

CAP Measures	Consistency
Measure EC2: Update CALGreen for residential buildings triennially. Work to mandate achievement of CALGreen Tier 1 energy performance. Measure EC6: Continue to be part of the Peninsula Clean Energy (PCE) Community Choice Aggregation (CCA) Program and continue to opt for the ECO100 option (100 percent renewable energy) for all City facilities.	Consistent. Development facilitated by the project would be required to be consistent with the latest Title 24 standards, which have been created and are further refined with each update to promote energy conservation and contribute to energy demand reduction in California. Development of residences under three stories facilitated by the project would be required to include a solar PV system per the 2019 Building Energy Efficiency Standards and energy efficient design and construction per CALGreen. New residents of the City would be defaulted into PCE's ECO100 option. Therefore, the proposed project would be consistent with these measures.
Measure TL1: Establish a Smart Growth Policy that prioritizes infill, higher density, transit-oriented and mixed-use development.	Consistent. The project's objective to encourage development of residences in the vicinity of transit, Downtown jobs, services, and open spaces and to better utilize the El Camino Real corridor, coupled with rezoning of Service Commercial properties to Corridor Mixed Use, would align with a Smart Growth Policy that prioritizes infill, high density, transit-oriented, and mixed-use development. Therefore, the proposed project would be consistent with this measure.
Measure WC1: Increase participation in recycling programs and ensure weekly collection of recyclables and organic waste	Consistent. Development facilitated under the project that includes more than five units would be mandated under AB 1826 (Mandatory Organics Recycling) to arrange for organic waste and recycling collection. Landscaping businesses, if generating 2 or more cubic yards of total waste, that operate on development facilitated by the proposed project would be required to recycle organic waste. Therefore, the proposed project would be consistent with this measure.

Source: City of Belmont 2017b

Summary

As described above, GHG emissions from development facilitated by the project would be less than significant as the project would be consistent with 2017 Scoping Plan, Plan Bay Area 2040, City General Plan, and the City CAP.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.7.4 Cumulative Impacts

The impact of GHG emissions generated by development facilitated by the project is inherently cumulative. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from any project must be considered in the context of their contribution to cumulative global emissions, which is the basis for determining a significant cumulative impact. This is determined through the project's consistency with applicable GHG emission thresholds and applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. As discussed under Section 4.7.3 *Impact Analysis*, GHG emissions from development facilitated by the project would not exceed the BAAQMD interpolated 2030 plan-level threshold. In addition, development facilitated by the project would be consistent with the 2017 Scoping Plan, Plan Bay Area 2040, City General Plan, and the City CAP. Therefore, the project would not a significant cumulative impact on GHG emissions.

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4.8 Hazards and Hazardous Materials

This section evaluates the potential impacts relating to hazards and hazardous materials impacts associated with implementation of the proposed project.

4.8.1 Setting

a. Hazardous Materials

The term “hazardous material” has different definitions for different regulatory programs. For the purpose of this EIR, the term “hazardous materials” refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines a hazardous material as any material that “because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.” Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The National Priorities List (NPL) is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to

guide the United States Environmental Protection Agency (USEPA) in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system.

Numerous smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking underground storage tanks (USTs) were upgraded under a federal requirement in the late 1980s. Another category of sites that may have some overlap with the types already mentioned is “brownfields” – previously used, often abandoned, sites that due to actual or suspected contamination are undeveloped or underused. Both the USEPA and California Department of Toxic Substances Control (DTSC) maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners’ reluctance to publicly label their property as potentially contaminated.

Asbestos Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by USEPA between the early 1970s and 1991 under the authority of the federal Clean Air Act (CAA) and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (USEPA 2021a). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 commercial and industrial structures are affected by asbestos regulations if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ and hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women (USEPA 2021b). Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 commercial and industrial structures are affected by LBP regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

b. Existing Conditions

Hazardous Materials Sites

The locations where hazardous materials are used, stored, treated and/or disposed of comes to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in database lists maintained by various State, Federal, and local regulatory agencies. In addition, Federal, State, and local agencies enforce regulations applicable to

hazardous waste generators and users, and the San Mateo County Environmental Health Services Division tracks and inspect hazardous materials handlers to ensure appropriate reporting and compliance.

Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low risk, although there can be instances of unintentional chemical releases. In such cases, the site would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater due to accidental spills, incidental leakage, or spillage that may have gone undetected. Some facilities are permitted for more than one hazardous material use and, therefore, could appear in more than one database.

The potential to encounter hazardous materials in soil and groundwater in the City is generally based on a search of Federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The DTSC EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a release exists. The California State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as leaking underground storage tank (LUST) sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), Belmont has the following types of hazardous sites that are still active or need further investigation: underground storage tanks (USTs), voluntary cleanup, school investigation, tiered permit, and one State response site (DTSC 2021; SWRCB 2021). These sites are dispersed throughout the City.

Existing sites that may potentially contain hazardous land uses in the City include large and small-quantity generators of hazardous waste, such as dry cleaners, gas stations and other industrial uses. According to DTSC and SWRCB, there are 10 open sites containing or potentially containing hazardous materials contamination located in the City including two sites in need of evaluation, seven cleanup program sites, and one active voluntary cleanup site. A full list of these sites and their cleanup status can be reviewed in Appendix HAZ (DTSC 2021; SWRCB 2021). Figure 4.8-1 shows the hazardous material sites within the City. Sites in proximity to identified hazardous material sites are primarily located along El Camino Real. Identified hazardous material sites within 50 feet of Draft Housing Opportunity Sites are listed in Table 4.8-1. The 900 El Camino Real hazardous site is Draft Housing Opportunity Site Number 51 that was previously a Leaking Underground Storage Tank (LUST) Cleanup Site but has received case closure and is approved for residential use. Identified hazardous material sites within 100 feet of Draft Housing Opportunity Sites are listed in Table 4.8-2.

Table 4.8-1 Hazardous Material Sites within 50 feet of Draft Housing Opportunity Sites

Site Name	Site Address	Site Type	Site Status
Lo Coco Liquors	1340 El Camino Real	LUST cleanup site	Completed - case closed
Belmont Firehouse Square	875 O'Neil Avenue	Cleanup program site (groundwater)	Open - site assessment
		LUST cleanup site	Completed - case closed
Peninsula Card Lock	610 Harbor	LUST cleanup site	Completed - case closed
Belmont 76 Service Center	995 Ralston Avenue	LUST cleanup site	Completed - case closed
Wong Family Trust	1000 El Camino Real	LUST cleanup site	Completed - case closed

Source: DTSC 2021; SWRCB 2021

Table 4.8-2 Hazardous Material Sites within 100 feet of Draft Housing Opportunity Sites

Site Name	Site Address	Site Type	Site Status
Bogenhuber Property	1510 Old County	LUST cleanup site	Completed - case closed
Unocal Station #4519	699 Ralston Avenue	LUST cleanup site	Completed - case closed
U-Haul #708-78	554 El Camino Real	LUST cleanup site	Completed - case closed

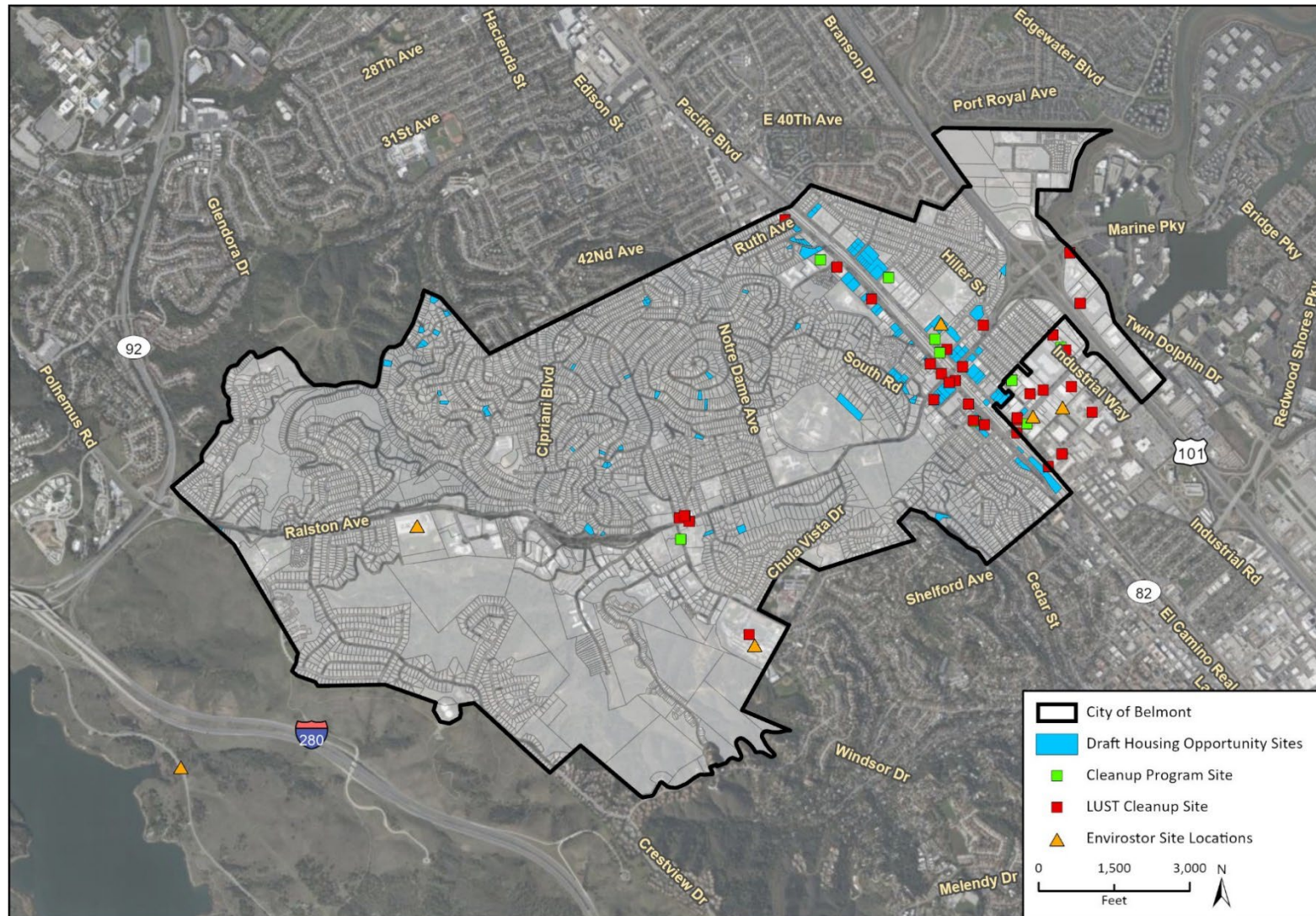
Use, Transport, and Abatement of Hazardous Materials

The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with Federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Figure 4.8-1 Hazardous Material Sites within the City



Imagery provided by Microsoft Bing, and their licensors © 2021.
 Additional data provided by Envirostor, 2021 and Geotracker, 2021.

20-10377 Belmont, Belmont Hsing Elem EIR
 8x11 Hazardous Material Sites within the City of Belmont

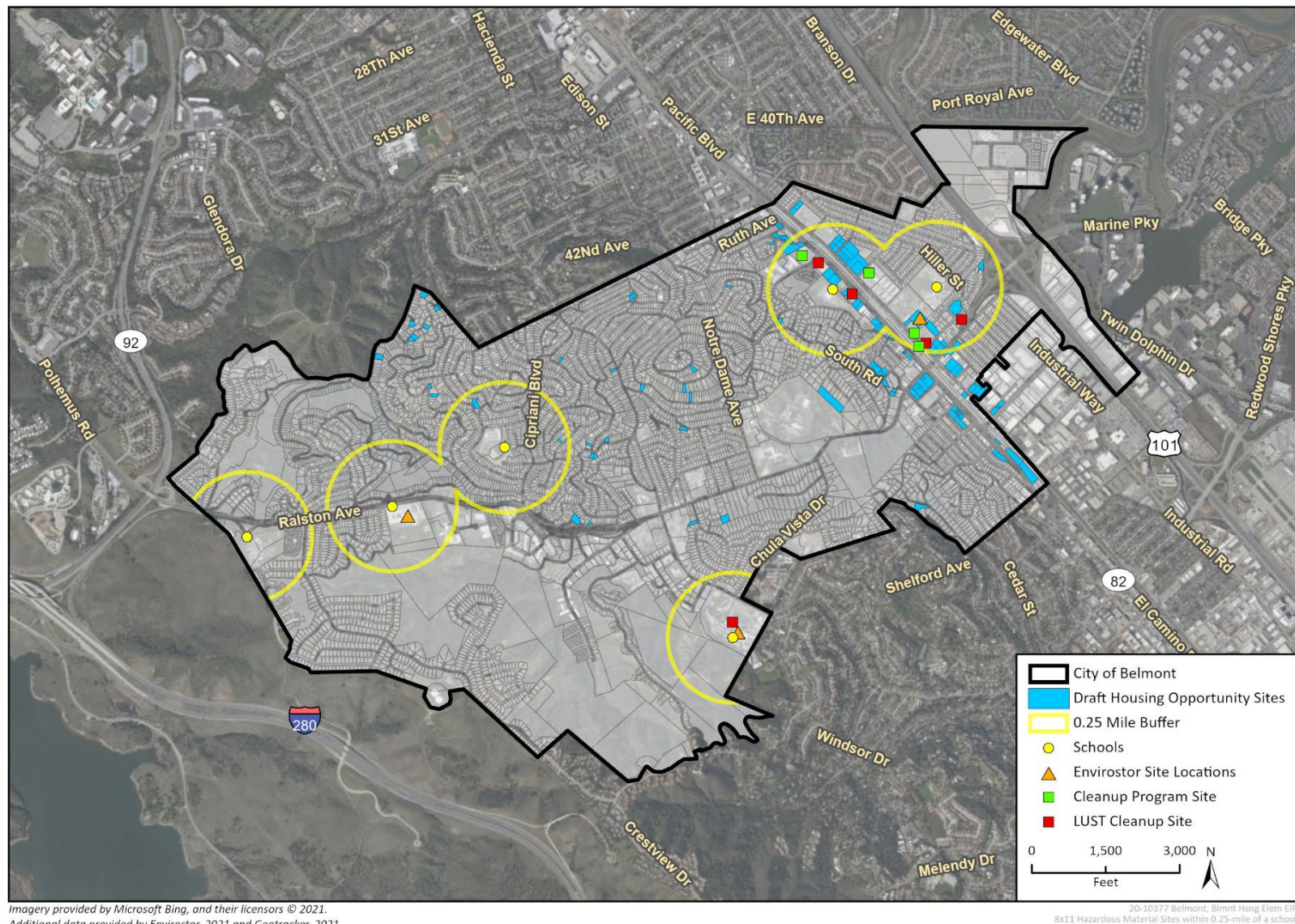
Schools

School locations require consideration because children are particularly sensitive to hazardous materials exposure. Additional protective regulations apply to projects that could use or disturb potentially hazardous products near or at schools. The California Public Resources Code requires projects that would be located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. Numerous day care facilities, charter schools, and private schools are also located throughout the City. Hazardous Material sites located within 0.25 mile of a school and Draft Housing Opportunity Sites are shown in Figure 4.8-2 and listed in Table 4.8-3

Table 4.8-3 Hazardous Material Sites within 0.25-mile of a School

School	Draft Housing Opportunity Site Address	Hazardous Material Site within 0.25-mile	Site Type
Central Elementary	319 Old County Road	7-Eleven (Former) #2366	LUST Cleanup Site
	325 Old County Road	Circraft Inc.	Cleanup Program Site
	401 Old County Road	PKS Cleaners	Cleanup Program Site
	403 Old County Road	U-Haul #708-78	LUST Cleanup Site
	405 Old County Road		
	407 Old County Road		
	409 Old County Road		
	411 Old County Road		
	415 Old County Road		
	425 Old County Road		
	500 El Camino Real		
	510 El Camino Real		
	513 Mountain View Avenue		
	516 El Camino Real		
	530 El Camino Real		
	564 El Camino Real		
	604 Mountain View Avenue		
	610 Mountain View Avenue		
	614 Mountain View Avenue		
	617 Mountain View Avenue		
	620 Mountain View Avenue		
	690 El Camino Real		
	700 El Camino Real		
	720 El Camino Real		
	803 Belmont Avenue		
Nesbit Elementary	575 El Camino Real	Arco #0613	LUST Cleanup Site
	580 Masonic Way	Post Office Parlor	LUST Cleanup Site
	600 Ralston Avenue	Quan Property	Cleanup Program Site
	601 Ralston Avenue	Richard's Dry Cleaners	Cleanup Program Site
	640 Masonic Avenue		
	678 Ralston Avenue		
	698 Ralston Avenue		
	815 Old County Road		
	951 Old County Road		

Figure 4.8-2 Hazardous Material Sites within 0.25-mile of a School



4.8.2 Regulatory Setting

Hazardous materials and waste can pose a potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent unwanted consequences. These regulatory programs are designed to reduce the risk that hazardous substances may pose to people and businesses under normal daily circumstances and as a result emergencies and disasters.

a. Federal Regulations

Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act, amended by the Superfund Amendments and Reauthorization Act (1986)

This law was enacted in 1980 and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, Comprehensive Environmental Response, Compensation and Liability Act established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. Comprehensive Environmental Response, Compensation and Liability Act also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

Federal Insecticide, Fungicide, and Rodenticide Act

This Act (7 U.S. Code [USC] 136 et seq.) provides Federal control of pesticide distribution, sale, and use. The USEPA was given authority under the Act to study the consequences of pesticide usage, and to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by the USEPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Governed by the U.S. Housing and Urban Development, regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, which requires sellers and lessors to disclose known LBP and LBP hazards to prospective purchasers and lessees. Additionally, all LBP abatement activities must follow California and federal occupational safety and

health administrations (California Occupational Safety and Health Administration [Cal/OSHA] and federal Occupational Safety and Health Administration [OSHA], respectively and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel can perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

U.S. Environmental Protection Agency

The USEPA is the agency primarily responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials. Applicable Federal regulations pertaining to hazardous materials are contained in the CFR Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws:

1. RCRA of 1976) (42 USC 6901 et seq.); Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (also called the Superfund Act) (42 USC 9601 et seq.)
2. Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et. Seq.)
3. Superfund Amendments and Reauthorization Act of 1986 (Public Law 99 499)

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. USEPA provides oversight and supervision for Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

b. State Regulations

Department of Toxic Substances Control

As a department of the California Environmental Protection Agency, DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both State and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the State. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in California Code of Regulations (CCR) Title 26. The State program is similar to, but more stringent than, the Federal program under RCRA. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in CCR Title 22, Division 4.5. As required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List for the State called the Cortese List.

California Fire and Building Code

The 2019 Fire and Building Code establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

c. Local Regulations

San Mateo County Hazardous Materials Business Plan

Businesses within the City must complete a Hazardous Materials Business Plan (Business Plan) using an electronic reporting system for the safe storage and use of chemicals. Firefighters, health officials, planners, public safety officers, health care providers and others rely on the Business Plan in an emergency. It is used to prevent or lessen damage to the health and safety of people and the environment when a hazardous material is released. The Hazardous Materials Business Plan Program is also known as the Community Right to Know Program and any citizen has the right to review these plans upon request.

San Mateo County Local Hazard Mitigation Plan

The San Mateo County Multijurisdictional Local Hazard Mitigation Plan (LHMP) incorporates wildfire hazard mitigation principles and practices into the routine government activities and functions of the County. The LHMP is currently in draft form. The LHMP recommends specific actions that are designed to protect people and community assets from losses to those hazards that pose the greatest risk. Mitigation programs and activities identified in the LHMP include fuel reduction and vegetation management, public education and outreach programs, increased training for urban

firefighters responding to WUI-area fires, and regional consistency of building code standards (San Mateo County 2021). The County's LHMP is incorporated by reference into the Safety Element of the City's General Plan.

San Carlos Airport Land Use Compatibility Plan (ALUCP)

The ALUCP for the Environs of San Carlos Airport was prepared according to FAA requirements and adopted by the City/County Association of Governments of San Mateo County (C/CAG) Board of Directors acting as the Airport Land Use Commission for the County of San Mateo, fulfilling California State requirements (California Public Utilities Code, Article 3.5, Section 21670, et seq.). Each ALUCP prevents exposure to excessive noise and safety hazards within an airport influence area over a 20-year horizon and are intended to encourage land uses in the vicinity surrounding an airport that are compatible with the airport land uses. The San Carlos ALUCP defines the entire City of Belmont, with the exception of the easternmost portion as Area A and the easternmost portion of the City of Belmont as Area B in its AIA. Within Area A, State law requires that sellers or lessors of real estate must disclose that the property is located within an airport influence area (California Business and Professional Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353). Within Area B, land use decisions must be reviewed by the Airport Land Use Commission—GP-10.1 in the ALUCP states, "Before an affected agency makes its general plan, specific plans, and zoning ordinance, or facilities master plan either consistent with the ALUCP or overrides the ALUCP as provided by law, the local agency shall refer all proposed development and land use policy actions that affect property within the project referral area, Area B of the AIA, to the Airport Land Use Commission (the C/CAG Board) for a determination of consistency with the ALUCP prior to issuing a permit for the proposed development (Pub. Util. Code, Section 21676.5(a))."

City of Belmont Civil Defense and Disaster Relief Ordinance

Belmont Municipal Code Chapter 8 provides for the preparation and carrying out of plans for the protection of persons and property within this City in the event of an emergency; the direction of the emergency organization; and the coordination of Belmont's emergency functions with all other public agencies, corporations, organizations, and affected private persons.

City of Belmont General Plan

The City of Belmont General Plan includes policies that aim to reduce potential damage from hazardous materials, including the following:

- Policy 2.16-1:** Require new development located in the San Carlos Airport Influence Area (AIA) to comply with applicable land use compatibility provisions of the San Carlos ALUCP through review and approval of a site development plan, or other development permit. Unless otherwise approved by City Council, development proposals must be consistent or conditionally consistent with applicable land use compatibility policies with respect to noise, safety, airspace protection, and overflight notification, as contained in the San Carlos ALUCP. Additionally, development proposals must meet FAA requirements with respect to building height as well as the provision of obstruction lighting when appurtenances are permitted to penetrate the transitional surface (a 7:1 slope from the runway primary surface). Consider C/CAG recommendations in the review of development proposals.

Policy 2.16-2: Coordinate with C/CAG and the FAA to protect public health, safety and welfare by ensuring the orderly operation of the airport and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around the airport.

Goal 6.4: Continue to promote the reduction, recycling, and safe disposal of household and business hazardous wastes through public education and awareness.

Policy 6.4-1: Continue to support the hazardous waste collection, management, and inspection efforts of San Mateo County, the State, and the Water Resources Control Board.

Policy 6.4-2: Educate residents and businesses about household hazardous wastes, less toxic materials that can be used in place of toxic materials, and proper household and business hazardous waste disposal methods

The City of Belmont General Plan also includes policies that aim to reduce potential hazards from emergencies and natural disasters, including the following:

Goal 6.7: Foster an efficient and coordinated response to emergencies and natural disasters.

Policy 6.7-1: Adopt, maintain, and periodically update a Local Hazard Mitigation Plan, coordinating with regional planning efforts as possible.

Policy 6.7-2: Continue to monitor changes in the Federal Disaster Act and applicable State laws, keep City officials and residents aware of the impacts of these changes, and update as necessary the City's Emergency Response Plan, which provides adequate response to disasters, including emergency ingress and egress, and defines the expected roles of City, County, and regional agencies.

Policy 6.7-3: Update City codes and ordinances dealing with public safety and emergency preparedness and relief to comply with State law and reflect the latest information on hazards and mitigation strategies.

Policy 6.7-4: Continue to upgrade preparedness strategies and techniques in all departments so as to be prepared when a disaster, either natural or man-made, occurs.

Policy 6.7-5: Develop effective mechanisms for a coordinated response to natural and man-made emergencies by:

- Conducting regular emergency planning meetings and disaster preparedness exercises with City departments, the Fire District, the County, medical centers, and other emergency service providers and relevant public agencies;
- Holding emergency drills that require all City staff to be adequately trained to handle different kinds of emergency scenarios; and, coordinating with the County on Regional Emergency Communications.

4.8.3 Impact Analysis

a. Methodology and Thresholds of Significance

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to hazards and hazardous materials are considered significant if implementation of the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires

Threshold:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Threshold:	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
Threshold:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-1 DEVELOPMENT FACILITATED BY THE PROJECT MAY RESULT IN THE RELEASE OF POTENTIALLY HAZARDOUS MATERIALS AND MAY OCCUR WITHIN 0.25 MILE OF A SCHOOL. HOWEVER, COMPLIANCE WITH REGIONAL AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS AND COMPLIANCE WITH THE SAFETY ELEMENT POLICIES WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would primarily consist of infill development. Infill development can involve demolition of existing structures. Demolition could result in emission of lead and asbestos if building materials contain these substances. However, lead-based materials and asbestos exposure are regulated by the Cal/OSHA. CCR Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal/OSHA standards. Under this rule, construction workers (and by extension, neighboring properties) may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the workday exceeds eight hours. Similarly, CCR Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

The control of asbestos during demolition or renovation of buildings is regulated under the Federal Clean Air Act. The Federal Clean Air Act requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all

asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (USEPA 2021c). Compliance with applicable standards would ensure impacts related to hazardous materials are less than significant.

Friable ACMs are regulated as a hazardous air pollutant under the Clean Air Act. As a worker safety hazard, they are also regulated under the authority of Cal/OSHA and by the Bay Area Air Quality Management District. In structures that would be demolished, any ACMs would be abated in accordance with State and Federal regulations prior to the start of demolition or renovation activities and in compliance with all applicable existing rules and regulations, including the Bay Area Air Quality Management District. These programs would ensure that asbestos removal would not result in the release of hazardous materials to the environment that could impair human health. Therefore, the impact related to ACMs would be less than significant.

Fluorescent lighting ballasts manufactured prior to 1978, and electrical transformers, capacitors, and generators manufactured prior to 1977, may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and State regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings, ensuring that the impact related to PCBs would be less than significant.

Development facilitated by the project would include the use of construction machinery that would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by County, State, and Federal regulations and compliance with applicable standards discussed in Section 4.8.2, *Regulatory Setting*, would ensure impacts from construction-related hazardous materials would be less than significant.

Development facilitated by the proposed project would result in the addition of residential units throughout the City. Housing and other residential uses do not utilize substantial quantities of hazardous materials, and thereby pose little risk of exposing the public to hazardous materials. Commercial uses would be subject to compliance with CCR, Cal OSHA, and other agencies to ensure hazardous materials risks to the public are minimized as well.

The proposed project would facilitate residential development at a higher density in the vicinity of some schools, as shown in Figure 4.8-2. However, as discussed above, residential uses typically do not emit hazardous materials or substances. While these sites may have pre-existing contamination, specifically Site 51, they would be remediated through coordination with the appropriate regulatory agency pursuant to federal, State, and local regulations as listed in Section 4.8.2, *Regulatory Setting*.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, impacts from a hazard to the public or the environment through routine transport, use or disposal of hazardous materials and reasonably foreseeable upset and/or accident conditions would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
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Impact HAZ-2 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN DEVELOPMENT ON SITES CONTAMINATED WITH HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE REMEDIATION WOULD MINIMIZE IMPACTS FROM DEVELOPMENT ON CONTAMINATED SITES, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Existing sites that use or have historically used hazardous materials or that may contain contaminants in soils or groundwater in the City include large and small-quantity generators of hazardous waste, such as gas stations, dry cleaners, and industrial uses. As described in Section 4.8.1, *Setting*, there are 10 open sites containing or potentially containing hazardous materials contamination located in the City including two sites in need of evaluation, seven cleanup program sites, and one active voluntary cleanup site. Development facilitated by the project on or near these hazardous material sites as listed in Table 4.8-1 and Table 4.8-2 could expose construction workers and future occupants to hazardous materials.

Development of identified hazard sites would be preceded by investigation, remediation and cleanup under the supervision of the Regional Water Quality Control Board, the San Mateo County Health Hazardous Materials Division, or DTSC, before construction activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Compliance with General Plan policies as listed in Section 4.8.2, *Regulatory Setting*, and compliance with federal, State, and local regulations would continue to apply to development and provide the same level of protection as they do under existing conditions. As the project would not increase the likelihood for development of identified hazard sites, impacts would be less than significant.

It is also possible that underground storage tanks (UST) in use prior to permitting and record keeping requirements may be present in the City. If an unidentified UST were uncovered or disturbed during construction activities, it would be removed under permit from the City; if such removal would potentially undermine the structural stability of existing structures, foundations, or impact existing utilities, the tank might be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing standards contained in Division 20, Chapters 6.7 and 6.75 (UST Program) of the California Health and Safety Code as enforced and monitored by the Environmental Programs Division.

The extent to which groundwater may be affected by an UST or other potential contamination source, if at all, depends on the type of contaminant, the amount released, the duration of the release, distance from source, and depth to groundwater. If groundwater contamination is identified, characterization of the vertical and lateral extent of the contamination and remediation

activities would be required by the Regional Water Quality Control Board prior to the commencement of any new construction activities that would disturb the subsurface. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the Regional Water Quality Control Board, depending upon the nature of any identified contamination. Compliance with existing State and local regulations would reduce impacts to less than significant levels.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
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Impact HAZ-3 DEVELOPMENT FACILITATED BY THE PROJECT COULD RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FROM THE SAN CARLOS AIRPORT FOR PEOPLE RESIDING IN DRAFT HOUSING OPPORTUNITY SITES. HOWEVER, COMPLIANCE WITH GENERAL PLAN GOALS AND POLICIES AND SAN CARLOS ALUCP GOALS AND POLICIES WOULD MINIMIZE IMPACTS FROM AIRPORT HAZARDS AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The San Carlos Airport is located approximately two miles south of the City of Belmont. The San Carlos Airport adopted an ALUCP pursuant to California law to ensure compatibility between the airport and nearby land uses. The ALUCP specifies that the City of Belmont, with the exception of the easternmost area is located within Area A of the Airport Influence Area, and the eastern portion of the City is within Area B of the Airport Influence Area (City/County Association of Governments of San Mateo County 2015). Given the distance between the Draft Housing Opportunity Sites and the airport, the increase from a maximum height of 55 feet to 65 feet would not result in a substantial difference that would affect airport safety. In addition, development facilitated by the project in Area B of the Airport Influence Area could have a maximum height limit of 65 feet. Pursuant to Federal Aviation Administration Section 77.9(a), a height of more than 20 feet above ground level at its site and Section 77.9(b) where a structure is within 10,000 feet of a runway less than 3,200 feet in length, and exceeding a ratio of 50 to 1 slope would be required to file Federal Aviation Administration Form 7460-1: Notice of Proposed Construction or Alteration, for any proposed construction or alteration that meets any of the of the notification criteria included in 14 CFR Part 77.9. The preparation and filing of Form 7460-1 would be required for all development facilitated by the project in the southernmost portion of the City and on a case-by-case basis for all other development in the City pursuant to criteria in 14 CFR Part 77.9. This requirement would be the same under existing conditions, and therefore would not increase a safety hazard or excessive noise from airports in the vicinity.

Portions of the City of Belmont are located within Airport Safety Zones. The southeasternmost portion of the City, east of Highway 101, is partially located within Safety Zone 4, Outer Approach/Departure Zone. However, there are no Draft Housing Opportunity Sites located within

this area and development facilitated by the project in this area would be required to comply with intensities and development regulations as set forth in the ALUCP. The southeastern portion of the City, west of Highway 101, is located within Safety Zone 6. Draft Housing Opportunity Sites within Zone 6 would be compatible and would not be restricted for safety reasons. Non-residential development facilitated by the project within Zone 6 would be considered on a case-by-case basis by the City/County Association of Governments of San Mateo County Board when reviewing development proposals pursuant to Safety Compatibility Policy 3 of the ALUCP.

In addition, development facilitated by the project would be required to comply with the San Carlos ALUCP, and applicable regional and local regulations. Development facilitated by the project would be required to comply with the City of Belmont General Plan, Land Use Element Policies 2.16-1 and 2.16-2, as described in Section 4.8.2, *Regulatory Setting*. Compliance with General Plan goals and policies and the San Carlos ALUCP goals and policies would reduce impacts to less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
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Impact HAZ-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT RESULT IN PHYSICAL CHANGES THAT COULD INTERFERE WITH OR IMPAIR EMERGENCY RESPONSE OR EVACUATION. THEREFORE, THE PROJECT WOULD NOT RESULT IN INTERFERENCE WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

There are no proposed physical changes such as roadway construction that would interfere or impair emergency response or evacuation. The project would not result in changes to emergency evacuation routes, nor would it substantially increase traffic or roadway congestion such that use of an evacuation route would be hindered. The Draft Housing Opportunity Sites are on existing parcels that are not dedicated to circulation or access.

Development facilitated by the project would accommodate future population growth and would increase vehicle miles travelled in the City. This could lead to increased congestion during emergency evacuations. However, the City would review and approve projects to ensure that emergency access meets City standards. Development facilitated by the project, as well as all development in the City, must comply with road standards and are reviewed by the San Mateo Consolidated Fire Department to ensure development would not interfere with evacuation routes and would not impede the effectiveness of evacuation plans.

Development facilitated by the project would result in population growth in the City. Population growth would incrementally increase traffic which could result in impacts to evacuation routes in the City and overburden adopted evacuation routes and other emergency response resources. Additionally, large concentrations of people could also result in adverse effects related to the implementation of emergency plans because the increased population may overburden adopted evacuation routes and other emergency response resources. However, the management of emergency response and emergency evacuations plans includes regular updates to these plans that

incorporate new or proposed developments, such as the development facilitated by the project. Thus, development facilitated by the project would be reflected in the regular and required updates of emergency and evacuation plans applicable to the City. Compliance with General Plan policies as listed in Section 4.8.2, *Regulatory Setting*, would further ensure that development facilitated by the project would not result in the impairment of implementation or physical interference with evacuation or emergency response plans.

Therefore, the project would not impair implementation of or physically interfere with evacuation or emergency response plans. The impact related to emergency response and evacuation plans would be less than significant.

Mitigation Measures

No mitigation measures would be required

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
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Refer to Section 4.17, *Wildfire* for a discussion of impacts related to wildfire. In particular, Impact WFR-2 concludes that the Draft Housing Opportunity Sites are in or near moderate, high and very high fire hazard severity zones. However, as stated in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are zoned for development. As such, the project would not increase the likelihood of people or structures to be exposed to significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.8.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative hazardous materials impacts is limited to projects within 0.25 mile of the sites. This geographic scope is appropriate for hazardous materials because risks associated with hazards and hazardous materials occur largely in a site-specific and localized context as adverse impacts from a hazardous materials release or spill diminish in magnitude with distance. Cumulative residential development in the vicinity of the identified hazardous materials sites would gradually increase the population exposed to the use and transport of hazardous materials; the routine use, storage, and disposal of hazardous materials; listed hazardous materials sites; and subject to emergency response and evacuation plans. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Implementation of existing laws and

regulations, including remedial action on contaminated sites, as discussed with regard to the project under Impacts HAZ-1 through HAZ-4, would avoid potential hazard impacts.

Wildland fire impacts would be less than significant as all of the Draft Housing Opportunity Sites are already zoned for development. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact regarding wildland fire.

Overall, hazards and hazardous materials impacts associated with individual developments are site specific in nature and must be addressed on a case-by-case basis. Since hazards and hazardous materials are required to be examined as part of the permit application and review process, potential impacts associated with individual projects would be adequately addressed prior to permit approval. With adherence to existing regulatory standards for hazardous materials, no significant cumulative human health impacts would occur, and the project would not have a cumulatively considerable contribution to a significant cumulative impact related to hazards and hazardous materials.

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4.9 Hydrology and Water Quality

This section analyzes impacts to surface water and groundwater resources associated with the implementation of the proposed project. Impacts to water supply and wastewater treatment are discussed in Section 4.16, *Utilities and Service Systems*.

4.9.1 Setting

Surface Water Hydrology and Quality

The Draft Housing Opportunity sites are located in the Belmont Creek and Laurel Creek watersheds. Belmont Creek originates in the hills above Hallmark Drive and flows east through the portion of Belmont south of Ralston Avenue into the San Francisco Bay. Water Dog Lake is a manmade reservoir in the Western Hills area fed by the Creek. From the lake, Belmont Creek runs along the border between the Harbor Industrial Area and the City of San Carlos and then discharges to the O'Neill and Belmont sloughs. Major tributaries to Belmont Creek run along Carlmont Drive, Alameda de las Pulgas, and along Notre Dame de Namur University. In total the watershed for Belmont Creek covers approximately 3 square miles.

North of Ralston Avenue, the eastern branch of Laurel Creek runs near Laurel Creek Drive, through the San Juan Hills and from there into the City of San Mateo. There are numerous small tributaries and streams in northwest Belmont that drain into Laurel Creek. Laurel Creek is an impaired water body under section 303(d) of the federal Clean Water Act (CWA), as discussed below under *Regulatory Setting*.

Many of the streams and creeks in both watersheds do not have regular flowing water, especially in the summer and fall months. There are areas identified as estuarine and marine wetlands around Belmont Slough, as well as freshwater emergent wetlands and freshwater ponds near Highway 101. Belmont Creek and East Laurel Creek are likely to be under the jurisdiction of the US Army Corps of Engineers (USACE, see *Regulatory Setting* below), and USACE has exerted jurisdiction over Belmont Slough and the Redwood Shores Lagoon just outside City limits (USACE 2021). Figure 4.3-1 in Section 4.3, *Biological Resources*, shows the locations of identified water features in the Belmont area.

Belmont Creek is not actively monitored or sampled regularly for water quality and is not utilized as a drinking water resource by any public utilities. Issues of concern related to Belmont Creek water quality include sediment and soil erosion from development; hydrocarbons, metals, and Polychlorinated Biphenyl (PCBs) from waste disposal and stormwater runoff from industrial and commercial facilities; nutrient and pesticide pollution from fertilizer and pesticide runoff from residential and other landscaping, and trash from streets, walkways, transit stops, and commercial uses within the watershed. About 34 percent of the flow into Belmont Creek is untreated stormwater from the City stormwater system (San Mateo Countywide Water Pollution Prevention Program 2020).

Groundwater Hydrology and Quality

The City of Belmont lies atop the San Mateo Subbasin (Subbasin) of the Santa Clara Valley Groundwater Basin, identified as Basin 2-09.03 by the California Department of Water Resources (DWR). This Subbasin covers approximately 48,100 acres bounded by the Santa Cruz mountains on the west, the San Francisco Bay to the east, the Westside Basin to the north, and San Francisquito Creek to the south. The Subbasin drains eastward from the Santa Cruz Mountains into the Bay

through numerous tributaries including Laurel and Belmont Creeks. Recharge of the Subbasin occurs through precipitation and infiltration from the streams that originate in the upland areas and lie within the drainage basin (DWR 2004).

Studies by the US Geological Survey (USGS) indicate that the Subbasin waters consist primarily of calcium magnesium carbonate bicarbonate waters (USGS 1997). Samples within the Subbasin have indicated elevated levels of nitrates in excess of USEPA Maximum Contaminant Levels (MCLs, see *Regulatory Setting* below). Other quality issues within the Subbasin are high levels of sodium and chlorine (DWR 2004). As discussed in Section 4.16, *Utilities and Service Systems*, water to the City of Belmont is provided by the Mid-Peninsula Water District (MPWD). MPWD relies entirely upon imported water and does not draw on groundwater from wells within the Subbasin. Water from the Subbasin is considered to be of low quality, unsuitable for irrigation or potable use, and economically unfeasible as a source of municipal water, primarily due to the presence of high levels of chloride, sulfates, dissolved solids, and other natural contaminants (MPWD 2020). However, there may be some private wells that do draw on water from the Subbasin, as discussed in *Regulatory Setting* below.

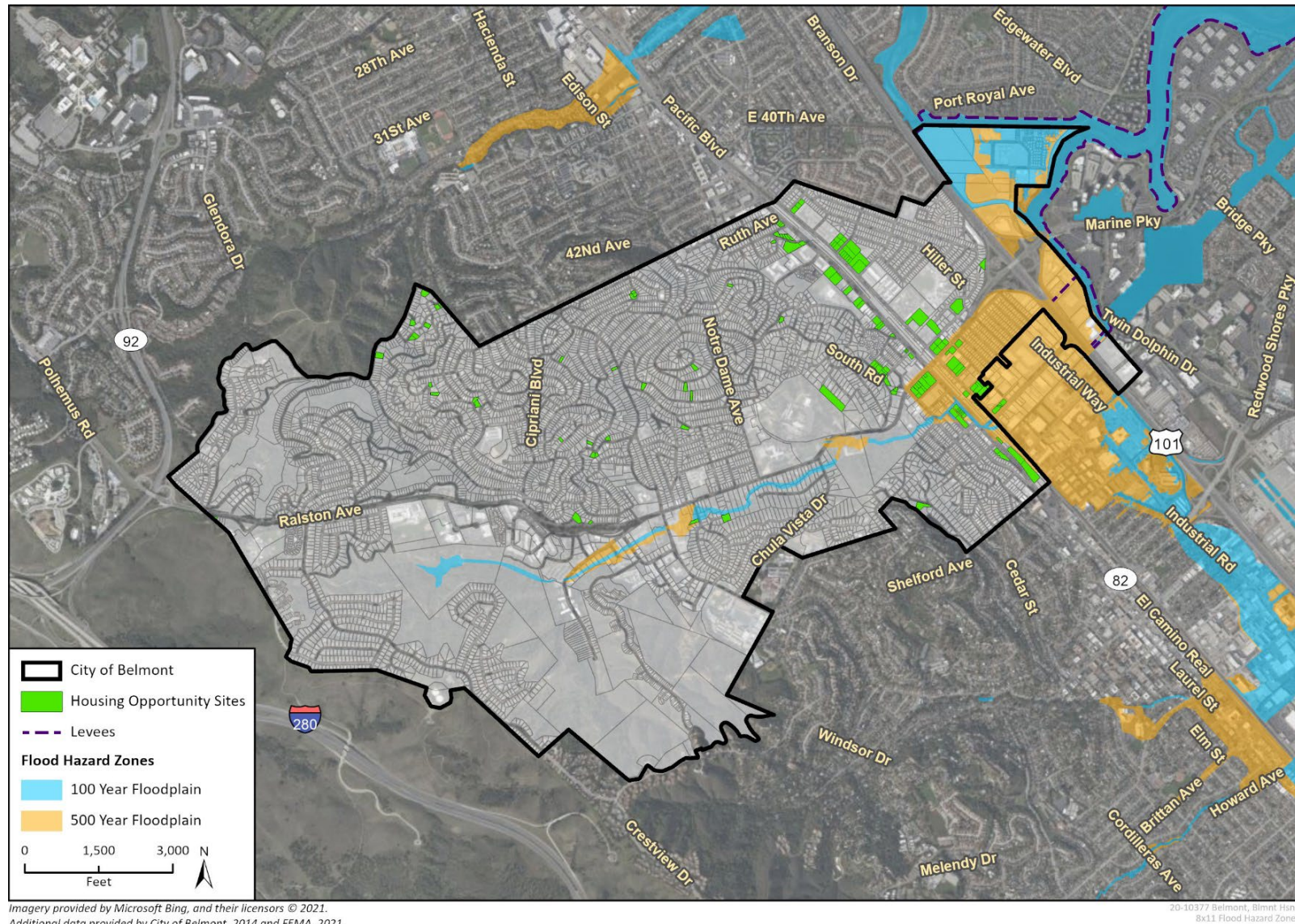
Flooding Hazards

Floodplains are areas that are subject to recurring inundation and flooding located adjacent to rivers, streams, and coastal areas. Floodplains are described in terms of statistical likelihood of flooding in a given year; e.g., a 100-year floodplain has a one percent chance of flooding in any year, while a 500-year floodplain has a 0.2 percent chance of flooding in any year.

The Federal Emergency Management Agency (FEMA) prepares Flood Insurance Maps that identify 100- and 500-year floodplains as required by the Flood Disaster Prevention Act (see *Regulatory Setting* below). Floodplain areas within the City of Belmont are depicted in Figure 4.9-1 below, and include areas east of Highway 101, the areas east of El Camino Real and south of Ralston Avenue (including all of the Belmont Village Priority Development Area located south of Ralston Avenue), and areas along Belmont Creek. The majority of floodplain areas within Belmont are 500-year floodplains and only the Draft Housing Opportunity Sites on or near to Belmont Creek are within or near 100-year floodplain areas.

Inundation can result from dam failure, which refers to the breakdown, collapse, or other failure of a dam structure characterized by the uncontrolled release of impounded water. The most common cause of dam failure is prolonged rainfall that produces flooding, although other causes include natural events such as earthquakes or landslides and structural deterioration. According to the San Mateo County Department of Planning and Building, there are two dams that, in the event of dam failure, could threaten the City of Belmont—the Crystal Springs Reservoir and the Notre Dame dam at Water Dog Lake (SMCDPB 2020). Failure of the Reservoir would threaten O’Neill Slough with runoff from the flooding of Foster City. Failure of the earthen dam at Water Dog Lake would flood Belmont Creek.

Figure 4.9-1 Flood Hazard Zones Near Belmont



Tsunamis are high sea waves that are caused by earthquake, submarine landslide, or other disturbances. Belmont lies on the eastern side of the Santa Cruz Mountains and is protected from tsunamis arising in the Pacific Ocean, although Belmont Slough, Bird Island, and Bair Island could potentially flood from a tsunami originating in San Francisco Bay. None of the Draft Housing Opportunity Sites are in a designated tsunami inundation zone (California Department of Conservation [CDC] 2021).

A seiche is a temporary disturbance or oscillation in water level of a lake or partially enclosed body of water, usually caused by changes in atmospheric pressure. San Francisco Bay lies immediately to the east of Belmont, and an earthquake could generate a seiche within the Bay; potential inundation would be similar to or less than that from a larger tsunami in the same area.

4.9.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The CWA gave the U.S. Environmental Protection Agency (USEPA) authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various contaminants in surface water, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and USACE. At the State and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine regional water quality control boards (RWQCBs). The San Francisco Bay Region RWQCB (SFRWQCB) is the CWA enforcement agency for San Mateo County.

Clean Water Act Section 303(d)

Under Section 303(d) of the CWA, States are required to develop and update a list of water bodies under their jurisdiction which fail to meet water quality standards even after point sources of pollution have utilized the minimum levels of pollution control. These are referred to as '303(d) impaired' bodies. Jurisdictions must establish priority rankings for 303(d) impaired water bodies and develop action plans to improve water quality to minimum standards. The plans include the setting of Total Maximum Daily Loads (TMDLs) for the pollutants which are impairing the water bodies; these limits are stricter than the normal minimum standards in order to bring the impaired bodies into compliance over time. While there are no 303(d) listed water bodies within Belmont City limits, the Draft Housing Opportunity Sites located near Sugarloaf Mountain may feature drainage to East Laurel Creek, which is 303(d) listed for diazinon (an agricultural insecticide). In addition, both Laurel Creek and Belmont Creek eventually discharge into the Lower San Francisco Bay through O'Neill and Belmont sloughs. Lower San Francisco Bay is 303(d) impaired for a wide variety of contaminants; those for which SFRWQCB has set TMDLs include PCBs, dioxin-like PCBs, and mercury, while other contaminants such as DDT, furan compounds, dieldrin, chlordane, cyanide, heavy metals, and trash do not have TMDLs set but are of increasing concern (DWR 2018).

Clean Water Act Section 401

Under Section 401 of the CWA, the RWQCBs have regulatory authority over actions in waters of the United States (WOTUS) and/or the State of California through the issuance of water quality certifications, which are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the CWA, described below).

Clean Water Act Section 402

Section 402 of the CWA regulates point-source discharges to surface waters and requires that all construction sites on an acre or greater of land, as well as municipal, industrial, and commercial facilities discharging wastewater or stormwater directly from a point source (e.g., pipe, ditch, or channel) into WOTUS must obtain permission under the National Pollutant Discharge Elimination System (NPDES) permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

In California, the NPDES program is administered by the SWRCB through the RWQCBs and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The CWA prohibits discharges of stormwater or wastewater unless the discharge is in compliance with an NPDES permit. Municipal stormwater and wastewater discharges from Municipal Separate Storm Sewer Systems (MS4s) and all other discharges are regulated by the local permitting authority where USEPA has approved the agency. Most MS4 Permits are tailored versions of general USEPA permits, while many industrial discharge permits are individual permits created for the specific discharge requirements of the project.

The SWRCB is the permitting authority in California, issues general MS4 permits, and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The order applies to construction sites that include one or more acre of soil disturbance. Containment and spill cleanup are encompassed in the Storm Water Pollution Prevention Plan (SWPPP) which is required to be developed as a condition of permit issuance. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site best management practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained.

Requirements for post-construction control of stormwater runoff are included in MS4 permits under Provision C.3, which allows permitting authorities to use the permit process to enforce appropriate source control and treatment measures in new development to address operational stormwater and wastewater discharges.

Clean Water Act Section 404

Under Section 404 of the Clean Water Act, proposed discharges of dredged or fill material into WOTUS require USACE authorization. WOTUS generally include tidal waters, lakes, ponds, rivers, streams, and wetlands. Federal regulations regarding the definition of WOTUS change with some regularity under different administrations. The Clean Water Rule was promulgated in 2015, expanding the definition of WOTUS and increasing the waters under USACE jurisdiction. In 2020 in Navigable Waters Protection Rule was issued and reversed the Clean Water Rule, removing almost 60 percent of previously regulated waters from federal jurisdiction. In June 2021 USEPA and USACE

announced a new rulemaking process to revise or reverse the Navigable Waters Protection Rule. The USACE identifies wetlands using a multi-parameter approach, which requires positive wetland indicators in three distinct environmental categories: hydrology, soils, and vegetation. According to the *Corps of Engineers Wetlands Delineation Manual* (1987), except in certain situations, all three parameters must be satisfied for an area to be considered a jurisdictional wetland. The *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region* (2008) is also used when conducting jurisdictional wetland determinations in areas identified within the boundaries of the Region, including San Mateo County.

National Toxics Rule and California Toxics Rule

In 1992, USEPA promulgated the National Toxics Rule, 40 CFR 131, establishing numeric criteria for priority toxic pollutants in multiple states in order to bring all states into compliance with the Water Quality Standards (WQS) requirements of section 303(c) of the CWA. The National Toxics Rule established WQS for 42 pollutants not covered under California's Statewide water quality regulations at that time. After the court ordered revocation of California's Statewide Basin Plans in September 1994, USEPA initiated efforts to promulgate additional federal WQS for California. In May 2000, USEPA issued the California Toxics Rule, which includes all the priority pollutants for which the EPA has issued numeric criteria not included in the National Toxics Rule. The USEPA is in the process of rulemaking for setting a standard for selenium in the San Francisco Bay under the California Toxics Rule (USEPA

Safe Drinking Water Act

The Federal Safe Drinking Water Act was enacted in 1974, allowing the USEPA to promulgate national primary drinking water standards specifying Maximum Contaminants Levels (MCLs) for each contaminant present in a public water system with an adverse effect on human health. Primary MCLs have been established for approximately 90 contaminants in drinking water. The USEPA has also adopted secondary MCLs as non-enforceable guidelines for contaminants that may cause cosmetic or aesthetic effects. States have the discretion to adopt them as enforceable standards. USEPA has delegated to the SWRCB the responsibility for administering California's drinking-water program. In 1976, California adopted its own safe drinking water act (see *California Safe Drinking Water Act* described below).

National Flood Insurance Act / Flood Disaster Protection Act

The National Flood Insurance Act of 1968 made flood insurance available for the first time. The Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas. These laws are relevant because they led to mapping of regulatory floodplains and to local management of floodplain areas according to guidelines that include prohibiting or restricting development in flood hazard zones. As shown in Figure 4.9-1 above, much of eastern Belmont including all of the Belmont Village PDA south of Ralston Avenue as well as areas along Belmont Creek lie in a Special Flood Hazard Area.

Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community.

The design standard for flood protection is established by FEMA. FEMA's minimum level of flood protection for new development is the 100-year flood event.

FEMA has also developed requirements and procedures for evaluating earthen levee systems and mapping the areas affected by those systems. Levee systems are evaluated for their ability to provide protection from 100-year flood events and the results of this evaluation are documented in the FEMA Levee Inventory System (FLIS). Levee systems must meet minimum standards and must be maintained according to an officially adopted maintenance plan. Other FEMA levee system evaluation criteria include structural design and interior drainage. Belmont, along with most of the cities around the San Francisco Bay, is protected by a system of levees monitored by FEMA.

In 2000, FEMA adopted revisions to 44 CFR, known as the Disaster Mitigation Act (DMA) or DMA 2000. Section 322 (a-d) of the DMA 2000 requires local governments to have a Hazard Mitigation Plan (HMP) as a condition of receiving federal disaster mitigation funds. The HMP must:

- Describe the process for assessing hazards, risks, and vulnerabilities
- Identify and prioritize mitigation actions
- Solicit input from the community (public), key stakeholders, and adjacent jurisdictions and agencies

Belmont's HMP is discussed under *Regional and Local Regulations*, below.

b. State Regulations

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of State waters through the issuance of WDRs and through the development of TMDLs. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with the Porter-Cologne Act.

The San Francisco Bay Basin Water Quality Control Plan is the Basin Plan that covers San Mateo County (the 'Basin Plan') and is discussed under *Regional and Local Regulations*, below.

California Safe Drinking Water Act

The USEPA has delegated to the California Department of Public Health responsibility for administering California's drinking-water program. In 1976, two years after the Federal Safe Drinking Water Act was passed, California adopted its own safe drinking water act (contained in the Health and Safety Code) and adopted implementing regulations (contained in 22 CCR). California's program sets drinking water standards that are at least as stringent as the Federal standards. Each community water system also must monitor for a specified list of contaminants, and the monitoring results must be reported to the State. Responsibility for the State's Drinking Water Program was transferred from the Department of Public Health to the Division of Drinking Water, which is a division of the SWRCB that was created in July 2014.

California General Plan Law, Government Code Section 65302

Government Code Section 65302(a) requires cities and counties located within the State to review the Land Use, Conservation, and Safety elements of the general plan "for the consideration of flood hazards, flooding, and floodplains" to address flood risks. The code also requires cities and counties in the State to annually review the Land Use element with respect to "those areas covered by the plan that are subject to flooding identified by floodplain mapping prepared by FEMA or the California DWR."

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater, provides for the creation of regional Groundwater Sustainability Agencies (GSA) and requires Groundwater Sustainability Plans (GSP) to be developed for medium- and high-priority groundwater basins. Although the greater Santa Clara Valley Groundwater Basin is a High Priority Basin due to the high reliance on groundwater supplies to provide drinking water to over a million people in the San Francisco Bay area, the San Mateo Subbasin has been designated a Low-Priority basin by DWR, due to the general lack of utilization for water supplies and is not required to form a GSA or submit a GSP (DWR 2019).

Cobey-Alquist Floodplain Management Act

The Cobey-Alquist Floodplain Management Act (Water Code Section 8400-8435) gives support to the NFIP by encouraging local governments to plan, adopt, and enforce land use regulations for floodplain management, to protect people and property from flooding hazards. The Act also identifies requirements that jurisdictions must meet to receive State financial assistance for flood control.

California Green Building Standards Code

The California Green Building Standards Code (24 CCR, Part 11) includes mandatory measures for residential and nonresidential development. For example, Section 4.106.2 requires residential projects that disturb less than one acre and are not part of a larger common plan of development to manage stormwater drainage during construction through on-site retention basins, filtration systems, and/or compliance with a stormwater management ordinance. Section 5.106.1 requires newly constructed nonresidential projects and additions of less than one acre to prevent the pollution of stormwater runoff from construction through compliance with a local ordinance or implementing BMPs that address soil loss and good housekeeping to manage equipment, materials, and wastes. Section 5.303 sets measures for indoor water use for non-residential development requiring metering devices to conserve water.

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop Urban Water Management Plans (UWMP) to actively pursue the efficient use of available supplies as well as conduct drought assessments and planning. This Act also requires the provision of water service to be affordable to lower income households (Section 10631.1). Similarly, Government Code Section

65589.7 (Senate Bill [SB] 1087) requires water service providers to reserve water allocations for low-income housing. Every five years, water suppliers are required to update their UWMPs to identify short-term and long-term water demand management measures to meet growing water demands. The 2020 UWMP for MPWD is currently in draft form. It emphasizes MPWD's reliance on imported water to meet its needs and does not anticipate insufficient supply under multi-year drought conditions.

California Construction Stormwater Permit

The California Construction Stormwater Permit (Construction General Permit), adopted by the SWRCB, regulates construction activities that include soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

The Construction General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three Risk Levels established in the General Permit
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters
- Develop and implement a SWPPP which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards
- Perform inspections and maintenance of all BMPs

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment and pollutants from construction materials, and address post construction runoff. The SWPPP also includes a plan for inspection and maintenance of all BMPs, as well as procedures for altering or increasing BMPs based on changing project conditions.

c. Regional and Local Regulations

Bay Conservation and Development Commission

The San Francisco Bay Conservation and Development Commission (BCDC) is a planning and regulatory agency with regional authority over the San Francisco Bay and the Bay shoreline, including the area up to 100 feet inland from the shoreline, as well as portions of creeks and sloughs that flow into the Bay, including Belmont Creek and O'Neill Slough. BCDC manages the permitting for any project that seeks to fill or extract materials from its jurisdictional waters. Discharges from development facilitated by the project that flow into Belmont Creek or O'Neill Slough may require permits from the BCDC.

San Francisco Bay Region Water Quality Control Plan

The San Francisco Bay RWQCB (SFRWQCB) 2012 Basin Plan, with amendments adopted in 2014, 2015, 2016, and 2018, describes the legal and technical water quality regulations for the San Francisco Bay Area, which includes the Draft Housing Opportunity Sites, including describing the

beneficial uses for water bodies in the region, which is a factor in determining the types of regulations that apply to discharges to the bodies. The beneficial uses described in the Basin Plan for water bodies that may be potentially affected by development facilitated by the project are described in Table 4.9-1 below.

Table 4.9-1 Designated Beneficial Uses

Designated Beneficial Uses	Water Body			
	Belmont Creek	Belmont Slough	Laurel Creek	O'Neill Slough
Municipal and Domestic Supply	No	No	No	No
Freshwater Replacement	No	No	No	No
Cold Freshwater Habitat	No	No	No	No
Estuarine Habitat	No	Yes	No	Yes
Fish Migration	No	Yes	No	No
Preservation of Rare and Endangered Species	No	Yes	No	No
Fish Spawning	No	No	No	No
Warm Freshwater Habitat	Yes	No	Yes	No
Wildlife Habitat	Yes	Yes	Yes	Yes
Body Contact Recreation	Yes	Yes	Yes	Yes
Noncontact Recreation	Yes	Yes	Yes	Yes

Source: SFRWQCB 2019

San Mateo Countywide Water Pollution Prevention Program

The SMCWPPP includes unincorporated County areas and 20 cities and towns in the county, including Belmont. The primary goal of SMCWPPP is to reduce the pollution carried by stormwater throughout San Mateo County into local creeks, San Francisco Bay, and the Pacific Ocean. SMCWPPP is responsible for maintaining compliance with the NPDES Stormwater Discharge Permit within the County and works to promote stormwater pollution prevention.

City of Belmont Local Hazard Mitigation Plan

Belmont's LHMP is incorporated as an annex to the San Mateo County Multi-Jurisdictional Hazard Mitigation Plan and fulfills the requirements of the 2000 Disaster Mitigation Act as discussed under *Federal Regulation*, above. Belmont's LHMP includes actions the City is taking to mitigate impacts from flood events, dam failure, and sea level rise.

City of Belmont Municipal Ordinances

Belmont has several provisions within its Municipal Code Chapter 7, Article IX, designed to minimize public and private losses due to flood conditions within flood prone, mudslide, or flood related erosion areas, defined as all areas of special flood hazards within the City of Belmont. The City's Grading Ordinance and Floodplain Management Ordinance are contained within the Building Ordinance. These ordinances ensure that potential buyers and occupiers of areas of special flood hazard are informed of the property's location in the hazardous area and that they must assume responsibility for their occupation thereof. The ordinances also do the following:

- Prevent excavation or site grading activities during the winter rain period
- Require a development permit to be obtained before any construction or other development begins within any area of special flood hazard
- Restrict or prohibit uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or flood heights or velocities
- Require that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction
- Control the alteration of natural floodplains, stream channels, and natural protective barriers, which help accommodate or channel flood waters
- Control filling, grading, dredging, and other development which may increase flood damage
- Prevent or regulate the construction of flood barriers which will unnaturally divert flood waters or which may increase flood hazards in other areas

Belmont also has a Wells Ordinance (Municipal Code Chapter 26) that prohibits wells from being constructed in areas that are subject to flooding. The extent of private well use within the City is unknown; DWR Well Completion reports indicate at least two historical wells have been reported within Belmont but do not list any current wells (DWR 2021).

City of Belmont General Plan and Belmont Village Specific Plan

The Belmont General Plan and the Belmont Village Specific Plan have a wide set of goals and policies designed to protect water quality within the streams, channels, and drainage flowing to the Bay, and to mitigate and reduce flood hazards. These goals and policies include:

City of Belmont General Plan

Policy 5.3-5: In design and construction, require use of best practices that preserve natural resources, such as soil, trees, native plants, and impermeable surfaces.

Goal 5.4 Preserve and restore Belmont's waterways and adjacent corridors as valuable community resources that serve as plant and wildlife habitats, groundwater recharge facilities, flood control and irrigation components, and connections between open space areas.

Policy 5.4-4: Preserve and enhance the natural riparian environment along waterway corridors, including Belmont Creek, by minimizing environmental and visual impacts.

Action 5.4-4a: Establish design and development standards for new development near waterway corridors to preserve and enhance the natural riparian environment along these corridors and ensure that building and vehicle service areas, loading docks, trash enclosures, and storage areas are set back from waterways and/or screened from view from the Belmont Creek corridor to minimize environmental and visual impacts.

Goal 5.5 Preserve water quality by promoting the protection of Belmont's creeks and other natural water bodies from pollution.

Policy 5.5-3: Require development projects to incorporate structural and non-structural BMPs to mitigate or reduce the projected increases in pollutant loads, in accordance with the NPDES permit guidelines.

Policy 5.5-4: Ensure that the design and construction of new infrastructure elements does not contribute to stream bank or hillside erosion or creek or wetland siltation, and incorporates site design and source control BMPs, construction phase BMPs, and treatment control BMPs to minimize impacts to water quality.

Policy 5.5-5: Implement water pollution prevention methods to the maximum extent practicable, supplemented by pollutant source controls and treatment.

Goal 5.9 Maintain and improve the reliability of the City's storm drainage system, and promote best management practices to protect this system from flooding, enhance water quality, and prevent infrastructure deterioration.

Policy 5.9-2: Encourage development projects of all sizes to incorporate site design measures that facilitate groundwater recharge and natural hydrological processes, allowing stormwater to infiltrate the ground on-site and/or be collected for reuse in landscaping and designated to on-site stormwater detention facilities.

Goal 6.2 Protect the community from risks to life and property posed by flooding.

Policy 6.2-1: Continue to pursue and implement flood control programs that reduce flood hazards, such as the City's Grading Ordinance and Flood Plain Management Ordinance.

Policy 6.2-3: Require all proposed drainage facilities to comply with the City's storm drainage facility requirements to ensure they are properly sized to handle 100-year flood conditions.

Policy 6.2-6: Require installation of protective structures or other design measures to protect proposed building and development sites from the effects of flooding in 100-year Flood Zones.

Policy 6.2-8: Comply with Federal Emergency Management Agency (FEMA) requirements to identify flood hazard areas and control development within these areas in order for residents to qualify for federal flood insurance.

Policy 6.2-10: Continue to comply with the Municipal Regional Stormwater Permit requirements for municipal authorities to address water quality and flow-related impacts of stormwater runoff; continue to enforce NPDES permits in Belmont; and continue to participate in the San Mateo Countywide Water Pollution Prevention Program.

Policy 6.2-11: Comply with Section 402(p) of the federal Clean Water Act, as amended by the Water Quality Act of 1987, which requires NPDES permits for stormwater discharges from municipal storm sewer systems, stormwater discharges associated with industrial activity (including construction activities), and designated stormwater discharges.

Belmont Village Specific Plan

Policy 5.1-3: Ensure that development projects in the Planning Area comply with the requirements of the Municipal Regional Stormwater NPDES Permit.

Policy 5.1-7: Require development in the Belmont Village Planning Area to include low impact development features to reduce stormwater pollutant loads and increase on-site infiltration.

Goal 6.1 Preserve natural environmental processes that protect health and safety, such as water filtration through soil that protects water quality and riparian vegetation that minimizes erosion and flooding.

Policy 6.1-1: Design storm drainage and flood control structures to minimize erosion and creek sedimentation and to preserve and enhance the wildlife habitat and vegetation of Belmont Creek.

Goal 6.2 Minimize the potential for loss of life, injury, property damage, and economic and social disruption resulting from natural and man-made hazards, including floods.

Policy 6.2-1: Ensure new projects within the 100-year Flood Zone are designed to reduce flood risk. Strategies include site planning to minimize flood risk and applying flood safe standards to new construction.

Policy 6.2-2: Continue to collaborate on and implement efforts to restore Belmont Creek and enhance ecological functions, biological resources, hydrology function, and flood control.

4.9.3 Impact Analysis

a. Methodology and Thresholds of Significance

Methodology

This section describes the potential environmental impacts of development facilitated by the project as relevant to hydrology, water quality, and flood risk. The impact analysis is based on an assessment of baseline conditions for the Draft Housing Opportunity Sites, including surface water, groundwater, and floodplains information gathered from the City of Belmont, San Mateo County, and multiple State and federal agencies, as described above under Section 4.9.1, *Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the development facilitated by the project.

Significance Thresholds

The following thresholds of significance are based on Appendix G to the *CEQA Guidelines*. For the purposes of this programmatic EIR, project implementation may have a significant adverse impact if it would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site
4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site

5. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
6. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows
7. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation
8. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS, OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUNDWATER QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities associated with development facilitated by the project would include demolition of existing structures, construction of new development, and the replacement and/or improvement of drainage facilities. Similar to existing conditions, construction activities could result in soil erosion due to earth-moving activities such as excavation, grading, soil compaction and moving, and soil stockpiling. The Draft Housing Opportunity Sites vary in elevation and slope by location. Runoff during storm events typically occurs as sheet flow across the site, and the types of pollutants contained in runoff may include sediment and other existing contaminants such as nutrients, pesticides, herbicides, trace metals, and hydrocarbons that can attach to sediment and be transported downstream through erosion via overland flow, ultimately entering nearby waterways and contributing to degradation of water quality.

Similar to existing conditions, construction activities would utilize hazardous materials such as diesel fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, transmission fluid, cement slurry, and other fluids required for the operation of construction vehicles or equipment. These types of hazardous materials are not acutely hazardous, and storage, handling, use, and disposal of these materials are regulated by county, State, and federal regulations and compliance with applicable standards discussed under *Regulatory* Setting, above, especially through the Construction General Permit and the SMCWPPP. Transport of these materials to and from construction sites would also be regulated under multiple authorities as discussed in Section 4.8, *Hazards and Hazardous Materials*. Direct contamination of surface water from construction runoff is possible at the Draft Housing Opportunity Sites that are near Belmont or East Laurel Creeks, including those grouped southeast of the Ralston Avenue and El Camino Real intersection, along and near East Laurel Creek Drive, and along Ralston Avenue. Such contamination is unlikely given required adherence to relevant standards and regulations.

Development facilitated by the project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction, as discussed in *Regulatory Setting*, above. This includes compliance with the SMCWPPP, compliance with the requirements of the SWRCB Construction General Permit, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land, and compliance with Belmont's NPDES MS4 Permit (Municipal Permit Order No. R9-2015-0049, NPDES Permit No. CAS612008) which requires measures to reduce and eliminate stormwater pollutants, installation of appropriate BMPs to control stormwater runoff from construction sites, and that grading and drainage permits be obtained prior to construction. Grading and drainage plans accompanying the permit application must include BMPs for erosion prevention and sediment control, fencing at waterways and in sensitive areas, and limitation of disturbed areas through temporary features. The permit applications must also demonstrate compliance with NPDES MS4 permit provisions.

Furthermore, the Belmont General Plan and Belmont Village Specific Plan contain policies that reinforce compliance with water quality regulation. Policy 6.2-9 and 6.2-10 require compliance with the NPDES MS4 Permit and the federal CWA, and Policy 5.5-3 requires new construction to implement BMPs to reduce pollutant runoff. In the Belmont Village Specific Plan, Policy 5.1-3 also requires compliance with the NPDES MS4 Permit, which any development facilitated by the project would be required to comply with regardless of policy statements.

Compliance with existing regulations and policies discussed above would reduce the risk of water degradation from soil erosion and other pollutants related to construction activities. Because violations of water quality standards would be minimized through existing regulations, impacts to water quality from construction activities from development facilitated by the project would be less than significant.

Operation

Development facilitated by the project would result in a net increase of impervious surfaces throughout the Draft Housing Opportunity Sites as currently undeveloped sites with mostly permeable surfaces become built out. On-site development and any associated off-site improvements greater than one acre in size would need to comply with the NPDES Construction General Permit, which requires the development of a SWPPP, and development smaller than one acre would be required to comply with the California Green Building Standards code for stormwater and construction runoff, as described in detail above. SWPPP implementation would reduce the risk of water degradation on site and off site from soil erosion and other pollutants related to project operation because a SWPPP requires the design, installation, and maintenance of post-construction stormwater controls.

As described in *Regulatory Setting*, above, Provision C.3 of the NPDES MS4 Permit allows permitting authorities to enforce post-construction BMPs to control operational stormwater runoff and water quality. Construction site inspectors from the Belmont Public Works Department enforce adherence to these BMPs. Furthermore, for development facilitated by the project within the Belmont Village PDA, the Belmont Village Specific Plan Zoning Design Standards Section 31.6.4 requires runoff from surface parking lots to flow through landscaped areas to increase natural filtration of pollutants from stormwater before it enters the stormwater conveyance system. On private property, once developed, the Belmont City Code, Chapter 21, Articles V and VI require that homeowners continue to prohibit any discharges from their property to the storm or sewer system which violate the NPDES Permit requirements.

Implementation of the regulations, permit requirements, BMPs, and policies described above would prevent or minimize impacts related to water quality and ensure that development facilitated by the project would not cause or contribute to the degradation of water quality in receiving waters. Development facilitated by the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality, and water quality impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF LOCAL GROUNDWATER BASINS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As described in *Setting*, above, the City of Belmont sits atop the San Mateo Subbasin of the Santa Clara Valley Groundwater Basin, which is not considered a good source of irrigation or municipal water due to high chloride, sulfate, dissolved solids, and other natural impairments. The San Mateo Subbasin is a Low Priority Basin under SGMA and is not required to develop a GSP.

Development facilitated by the project could increase the demand for water within the City, but would not impact local groundwater supplies because MPWD, the primary water purveyor for the City, does not rely on or utilize any groundwater resources for its supply.

Development facilitated by the project may increase the amount of impervious surfaces, especially development within the Draft Housing Opportunity Sites located outside the Belmont Village PDA and the built-up El Camino Real corridor, which may reduce the amount of water percolating into the ground to recharge groundwater supplies. The Belmont General Plan policies related to groundwater recharge and permeable surfaces would work to reduce the impact of any net increase in impermeable surfaces, including Policies 5.9-2 and 5.3-5 which encourage site design features to protect permeable surfaces and groundwater recharge. Within the Belmont Village PDA, the Belmont Village Specific Plan includes Policy 5.1-7 which requires development within the PDA to include low-impact development features to increase on-site infiltration.

Implementation of existing local regulations and policies would ensure that development facilitated by the project would not interfere substantially with groundwater recharge, and impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?
Threshold 4:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
Threshold 5:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impact HYD-3 DEVELOPMENT FACILITATED BY THE PROJECT MAY ALTER DRAINAGE PATTERNS AND INCREASE RUNOFF ON INDIVIDUAL DRAFT HOUSING OPPORTUNITY SITES BUT WOULD NOT RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFF SITE, INCREASED FLOODING ON OR OFF SITE, OR CONTRIBUTE INCREASED RUNOFF THAT WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER SYSTEMS OR CONTRIBUTE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities would involve stockpiling, grading, excavation, dredging, paving, and other earth-disturbing activities that could temporarily alter existing drainage patterns. As described under Impact HYD-1 above, compliance with SWRCB's NPDES Construction General Permit and Belmont's NPDES MS4 Permits as regulated by the SMCWPPP, and the applicable local regulations would reduce the risk of short-term erosion and increased runoff resulting from drainage alterations during construction. General Plan Policies 3.4-6, 5.9-2, 5.4-3, 5.4-4, and 6.1-11 work to reduce erosion potential during construction and operation and protect Belmont Creek and other waterways by prohibiting alteration of their course. Local alteration of drainage at individual Draft Housing Opportunity Sites from development facilitated by the project may occur, but such drainage alteration would be considered prior to grading or use permit approval, would be required to connect to the existing storm drainage system, and no alteration of the course of streams or creeks would occur.

In addition to this suite of regulations, development facilitated by the project occurring in special flood hazard areas, such as those in the Belmont Village PDA and along El Camino Real, would be required to comply with the provisions of Chapter 7, Article IX of the Belmont Municipal Code regarding flood prevention, as described above under *Regulatory Setting*, including limitations on construction activities during the rainy season and the requirement for flood-control measures as part of permit issuance. Therefore, impacts would be less than significant.

Operation

Development facilitated by the project may alter the existing drainage patterns in the Draft Housing Sites through introduction of new impervious surfaces and infrastructure, such as driveways, roofs, and patios, as well as new downspout outflows from residential rain gutters and new runoff from landscaping irrigation. These alterations could increase the rate and/or amount of surface runoff, redirect runoff to different discharge locations, or concentrate runoff from sheet flow to channelized flow. Runoff that does not infiltrate and flows off site would be captured in the local storm drain systems and ultimately discharge to the San Francisco Bay.

Impact HYD-1 discusses applicable regulations that would limit pollutant discharges, including sediment and silt, from the project. As discussed above for Impact HWQ-1, multiple layers of regulations require development facilitated by the project to reduce and eliminate stormwater pollutants, as well as implementation of BMPs to control post-construction operational stormwater runoff. In particular, the SMCWPPP's administration of Provision C.3 of the Belmont NPDES MS4 Permit, which requires post-construction stormwater control BMPs, and the Belmont General Plan and Municipal Code policies requiring adherence to the NPDES Permit as a condition of grading and use permit approval will work to enforce compliance with all relevant standards and regulations.

The Belmont General Plan goals and policies intended to reduce flood hazards and overwhelming of the drainage system, such as Policies 6.2-1 through 6.2-11 and Policy 5.9-2, would reduce the potential for increased susceptibility to flooding on or offsite. Furthermore, in accordance with General Plan and Belmont Village Specific Plan policy, Belmont has identified and begun to implement a variety of storm water drainage system upgrades, especially in the Belmont Village PDA and along the El Camino Real corridor where the majority of the Draft Housing Opportunity Sites are located, in anticipation of an overall increase in population and corresponding increases in development and stormwater runoff (City of Belmont 2017). The Belmont Village Specific Plan policies and goals both reinforce the General Plan and Municipal Code requirements and provide additional measures to reduce the impact of flooding and stormwater discharges within the Belmont Village, especially Policy 6.2-1 which requires additional site design features for development located within the 100-year floodplain identified in Figure 4.9-1 above. Implementation of these goals and policies would ensure that the runoff from development facilitated by the project does not exceed the capacity of existing and future storm drain systems. Impacts would be less than significant.

The project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems or result in substantial additional polluted runoff. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 6:	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?
Threshold 7:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-4 DEVELOPMENT FACILITATED BY THE PROJECT COULD ALTER DRAINAGE PATTERNS ON OR INCREASE RUNOFF FROM THE DRAFT HOUSING OPPORTUNITY SITES. THE DRAFT HOUSING OPPORTUNITY SITES WITHIN AN AREA AT RISK FROM INUNDATION BY FLOOD HAZARD WOULD BE REQUIRED TO COMPLY WITH APPLICABLE GENERAL PLAN AND BELMONT VILLAGE SPECIFIC PLAN GOALS AND POLICIES TO PREVENT IMPEDANCE OR REDIRECTION OF FLOOD FLOWS OR RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION. THE DRAFT HOUSING OPPORTUNITY SITES IN AREAS AT RISK FROM POST-WILDFIRE FLOODING WOULD BE REQUIRED TO COMPLY WITH APPLICABLE STATE, COUNTY, AND CITY REGULATIONS AND POLICIES TO REDUCE IMPACTS FROM REDIRECTION OF POST-FIRE FLOWS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed above in *Setting* and shown in Figure 4.9-1, much of southeastern Belmont lies within a 500-year flood hazard area. The only 100-year floodplain runs along Belmont Creek, and there are only a few Draft Housing Opportunity Sites that may have portions of the parcel that lie within the floodplain or that might require nearby stormwater or infrastructure alterations within the 100-year floodplain. Development facilitated by the project in areas not within the flood hazard areas but located on the hillsides may also contribute to impacts to flows from post-wildfire flooding; however, the project would not change this existing condition. Low-lying coastal areas adjacent to bounded bodies of water may be subject to risk from seiche wave behavior; these areas are generally the same as those located in a coastal floodplain as the water-level rise is similar in both cases. Therefore, some analysis applicable to floodplain impacts also applies to seiche impacts. As discussed above in *Setting*, Belmont lies on the eastern side of the Santa Cruz Mountains and is protected from any tsunami arising along the shores of the Pacific Ocean by the mountains; a tsunami or seiche wave arising within the San Francisco Bay would threaten Belmont Slough and nearby coastal areas outside the City, but there are no areas within Belmont that are at risk from tsunami (CDC 2021).

For sites with portions within the 100-year floodplain or that require alterations to any infrastructure that lies within the floodplain, development would be required to comply with General Plan and Belmont Village Specific Plan policies that aim to achieve General Plan Goal 6.2 and Belmont Village Specific Plan Goal 6.2, which both seek to reduce the risk to life and property from flooding in the flood hazard area. Along with regulatory efforts discussed under Impacts HYD-1 and HYD-3, above, General Plan Policies 6.2-1, 6.2-3, 6.2-6, and 6.2-8 set out policies to reduce or eliminate risks from flooding within the 100-year floodplain, including requiring compliance with the City's Grading Ordinance and Floodplain Management Ordinance. These requirements ensure that any development on the Draft Housing Opportunity Sites located in flood hazard areas would incorporate all feasible design features to avoid the impedance or redirection of floodwaters, which in general would be channeled to Belmont Creek and/or the City stormwater system. Policy 6.2-6 further requires that new drainage systems, such as those which might be proposed as part of development facilitated by the project, be compliant with the City's storm drainage requirements to ensure the system remains properly sized to handle 100-year flood conditions. Within the Belmont Village PDA, Belmont Village Specific Plan Policies 6.2-1 and 6.2-2 provide further reinforcement of

the requirement to consider flood risk in potential project design and protection of Belmont Creek as a flood control mechanism.

Development in flood hazard areas is not an environmental impact for CEQA purposes in and of itself; impact from development facilitated by the project would only be significant if it exacerbated existing environmental hazards or conditions. As individual projects would be required to comply with the stated policies and ordinances designed to reduce risk from flooding, existing flood hazards would not be exacerbated. As discussed under Impacts HYD-1 and HYD-3, above, development facilitated by the project would be required to implement all applicable design features and BMPs to control, reduce, or eliminate pollutant runoff into the stormwater system or uncontrolled off-site runoff; this is further reinforced by General Plan Policy 5.5-3 which requires incorporation of BMPs to reduce increases in pollutant loads in accordance with the City NPDES MS4 Permit. Impacts would be less than significant.

Development facilitated by the project on the sloped hillsides of the Western Hills and San Juan Canyon areas could alter drainage patterns or increase runoff which might redirect post-fire flood flows downslope. After a major wildfire, prolonged or intense rain events can cause flooding on newly exposed unstable slopes that previously were stabilized by vegetation. Development in locations on the hillsides could affect post-fire flood flows by either creating new flows due to the increase of impermeable surface further increasing post-fire flow, or by altering the course of post-fire flooding from burned slopes above the development through alteration of drainage or direct impedance of flood waters.

As detailed above in *Regulatory Setting*, development facilitated by the project would be subject to State, County, and City requirements (in both the General Plan and Code) for project design and permitting that include measures to address the risks of post-fire flooding, including approval from the Belmont Fire Protection District and compliance with the International, California, and City of Belmont Fire Codes. Compliance with the relevant fire codes and City design standards would ensure risks of alteration or impedance of post-fire flows were minimized to the greatest extent feasible. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 8: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. THERE IS NO APPLICABLE SUSTAINABLE GROUNDWATER MANAGEMENT PLANS. COMPLIANCE WITH THE BASIN PLAN WOULD BE A REQUIREMENT OF ALL DEVELOPMENT FACILITATED BY THE PROJECT. THERE WOULD BE NO IMPACT.

As discussed under *Regulatory Setting* above, the City of Belmont is located within the San Mateo Subbasin of the Santa Clara Valley Groundwater Basin. The San Mateo Subbasin is designated a Low Priority Basin by DWR and is not required to form a GSA or submit a GSP (DWR 2019). MPWD does

not have a groundwater management plan, and groundwater within the San Mateo Subbasin is not utilized for municipal uses. Therefore, there is no applicable groundwater management plan and there would be no impact.

The San Francisco Region Water Quality Control Plan is the Basin Plan for the City of Belmont. The Basin Plan describes the beneficial uses of water bodies within or near the City that may be affected by development facilitated by the project; these uses are detailed in Table 4.9-1 above. The Basin Plan maintains the beneficial uses of these water bodies primarily through water quality requirements implemented through the NPDES permit system, and SMCWPPP is the primary authority that issues and enforces NPDES permits in San Mateo County. Compliance with the Basin Plan would be a requirement of any permits issued for development facilitated by the project. Therefore, the project would not conflict with or obstruct implementation of the Basin Plan. There would be no impact.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

There would be no impact.

4.9.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative hydrology and water quality impacts is the watersheds and groundwater basins where the Draft Housing Opportunity Sites are located. As discussed throughout this analysis, the City of Belmont is located within the San Mateo Subbasin of the Santa Clara Valley Groundwater Basin and is connected hydrologically to both the Belmont Creek and Laurel Creek watersheds, which collectively drain into Belmont and O'Neill Sloughs and from there to the San Francisco Bay. This geographic scope is appropriate for hydrology and water quality because water quality impacts are localized in the watershed where the impact occurs and may influence receiving waters into which they drain. Cumulative development within this defined geographic scope includes full buildout of the City's General Plant.

Cumulative development would generally increase impermeable surface area in the Belmont Creek watershed and increase runoff into the Laurel Creek watershed. Development would potentially increase peak flood flows, alter drainage patterns, and increase pollutants in the regional stormwater. However, cumulative development would also be required to adhere to all applicable State and local regulations designed to control erosion and protect water quality, including the Belmont Municipal Code, NPDES Construction General Permit and MS4 General Permit as administered by the SMCWPPP, and Basin Plan policies. All construction sites larger than one acre in size would be required to prepare and submit a SWPPP, thereby reducing the risk of water degradation on and off site from soil erosion and other pollutants, and smaller developments would still be required to adhere to any permit requirements imposed by the applicable policies and ordinances discussed under Impacts HYD-1 through HYD-4, above.

As discussed above under Impacts HYD-1 through HYD-4, development facilitated by the project would increase impervious surface areas and alter drainage patterns. However, compliance with

relevant water quality regulations, BMPs, and policies would reduce the risk of water degradation from soil erosion and other pollutants related to construction and operational activities. Construction and operation of development facilitated by the project would not violate any water quality standards or Waste Discharge Requirements or otherwise substantially degrade water quality. The project's water quality and groundwater recharge impacts would be less than significant. Development facilitated by the project would comply with NPDES, MS4, and City requirements related to stormwater runoff and water quality and consequently would not contribute to cumulative impacts to peak runoff, flooding, groundwater recharge, or water quality. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to water quality.

As discussed throughout this analysis, development facilitated by the project would increase the demand for water, all of which is anticipated to be delivered by MPWD through the use of imported water. Demand for groundwater supply is currently negligible within the City. There are no groundwater management plans, and City policies exist to protect natural recharge of the underlying groundwater basins from any impacts of development. Therefore, cumulative development would not result in a significant cumulative impact. The project's impacts to groundwater supplies and groundwater management efforts would be less than significant and the project would not have a cumulative considerable contribution to a significant cumulative impact related to groundwater.

As discussed under Impact HYD-4, several of the Draft Housing Opportunity Sites are near the 100-year flood hazard area and may have portions of the parcels within a zone at risk of inundation by flood or seiche and therefore are at risk of release of pollutants due to inundation. For these sites, development facilitated by the project would be required to comply with General Plan and Belmont Village Specific Plan policies that aim to achieve General Plan and Belmont Village Specific Plan Goals 6. 2. Projects would be analyzed and mitigated on a case-by-case basis and would be designed to avoid or mitigate potential impacts related to flooding. Cumulative impact related to flooding or seiche would therefore be less than significant with applicable mitigation. As discussed under Impact HYD-4, development facilitated by the project may impede or redirect flood flows or risk release of pollutants due to inundation in hillside areas from post-wildfire slope instability. Projects would be required to adhere to all applicable building and fire codes, zoning requirements and design standards related to flood flows and project inundation, and impacts would be less than significant. Because flooding is localized and site-specific, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to flood hazard or inundation risks in the greater watershed or groundwater basin. Cumulative impacts would be less than significant.

4.10 Land Use and Planning

This section analyzes the consistency of the proposed project with applicable land use plans, policies, and regulations, and identifies environmental effects that would arise from such inconsistencies.

4.10.1 Setting

a. Existing Land Uses

The general distribution of land uses within the City is shown in Table 4.10-1. Although residential land uses comprise most of the City's land area, Belmont is characterized by a diverse range of land uses. Open space, found throughout the City, makes up the second largest portion of land area in the City. Less predominant in terms of land area are commercial, institutional and public/community facilities.

Table 4.10-1 Existing Land Use Summary for Belmont 2035 General Plan

Land Use Designation	Total Acres
Residential	1,614.5
Residential Low Density (1-7 du/ac)	1,214.1
Residential Medium Density (8-20 du/ac)	88.7
Residential High Density (21-30 du/ac)	88.2
Hillside Residential Open Space	233.5
Mixed Use and Commercial	199.2
Belmont Village Mixed Use	54.3
Corridor Mixed Use (up to 45 du/ac)	28.4
Regional Commercial	45.0
Neighborhood Commercial	13.3
Office Commercial	43.7
Service Commercial	14.6
Other	622.2
Institution	108.8
Public/Community Facilities	161.4
Open Space	352.0
Total Acres Within City Limits	2,435.9
Harbor Industrial Area 1	5.3
Harbor Industrial Area 2	45.1
Total Acres Within Planning Area	2,486.3

Notes: du=dwelling units; ac=acres; acreage does not include right-of-way

Source: City of Belmont 2017a; Dyett & Bhatia 2016

City of Belmont 2035 General Plan Land Use Designations

Residential

- **Low Density Residential (1-7 du/ac):** The Low Density Residential land use designation applies to use of land for single family detached residences, but can also include townhouse developments that are clustered to provide open space.
- **Medium Density Residential (8-20 du/ac):** The Medium Density Residential land use designation applies to use of land for duplexes, townhomes, low-rise apartment buildings, and other less intense multifamily residential development types.
- **High Density Residential (8-20 du/ac):** The High Density Residential land use designation applies to use of land for multifamily housing.
- **Hillside Residential and Open Space (density varies):** The Hillside Residential and Open Space land use designations apply to lands in the San Juan and Western Hills Plan areas. These Plan Areas contain steep slopes, species habitat, and environmental resources that the City is protecting through provisions of Plans and implementing zoning. The permitted density is dependent on factor of the slope.

Mixed Use and Commercial

- **Belmont Village Mixed Use (FAR 2.0):** The Belmont Village Mixed Use land use designation applies to all parcels in the Belmont Village Specific Plan (BVSP) area and is intended to promote a pedestrian-oriented, mixed-use core in Downtown Belmont. The Belmont Village Mixed Use designation allows for residential uses, as well as retail, service, office, and entertainment uses, where appropriate, in a vertical and/or horizontal mixed-use setting. The BVSP provides more details on precise mix of uses and density and intensity standards for subdistricts.
- **Corridor Mixed Use (FAR 1.75; 45 du/ac):** The Corridor Mixed Use land use designation applies to parcels along El Camino Real outside of the BVSP area and is intended to provide community and visitor-serving retail and services, lodging, office, and high density residential in a horizontal and/or vertical mixed-use setting. A mix of uses in individual developments is encouraged but not required.
- **Regional Commercial (FAR 1.8):** The Regional Commercial land use designation allows for community-serving retail and services; visitor- and retail-serving auto-oriented commercial services, such as lodging, service stations, car dealerships, and commercial office uses. Some light industrial and research and development (R&D) uses may also be permitted. More than one zoning district may apply to areas within the Regional Commercial designation, to ensure that auto-oriented uses are appropriately situated among the community-serving retail and services in the area.
- **Neighborhood Commercial (FAR 1.5):** The Neighborhood Commercial land use designation is intended to provide neighborhood retail and service uses to the residents of Belmont.
- **Office Commercial (FAR 1.5):** The Office Commercial land use designation provides for professional office, executive office, and other office uses.
- **Service Commercial (FAR 1.5):** The Service Commercial land use designation accommodates heavy and service commercial and light industrial uses, such as repair shops, small warehouses, wholesale establishments, automotive services, and light manufacturing.

Other

- **Institutional:** The Institutional land use designation applies to educational, cultural, faith-based and health-related services, and it may include a residential component. No set density/intensity standards are defined for this designation; rather, the Planned Development (PD) process defines these on a project-by project basis.
- **Public/Community Facilities:** The Public/Community Facilities designation applies to all public and community facilities, including public schools, city parks and recreation facilities, community centers, the library, and various other publicly owned facilities, such as public infrastructure.
- **Open Space:** The Open Space land use designation applies to natural open spaces that are undeveloped/unimproved and are not intended to see significant improvements associated with city parkland (e.g., play structures, athletic fields, etc.). Trails may be provided, and the areas may be maintained to manage wildfire risk, erosion, and other hazards where feasible.
- **Harbor Industrial Area (HIA) (FAR 5.0):** The HIA land use designation applies to the unincorporated area within Belmont's SOI. Harbor Industrial Area 1 (HIA-1) is intended to provide high density residential as well as light industrial, retail, hotel, and research and development uses. Harbor Industrial Area 2 (HIA-2) is intended to provide a similar set of uses, excluding residential uses while adding large floorplate retail uses.

The general distribution of land uses within the BVSP area is shown in Table 4.10-2. Nearly 27 acres, or almost half (47 percent) of developable land within the BVSP area are considered to be potential opportunity sites for future new development or redevelopment since most are vacant or underutilized parcels (City of Belmont 2017b). Therefore, many of the Draft Housing Opportunity Sites are located within the Village Core, Village Corridor Mixed Use and Station Core.

Table 4.10-2 Existing Land Use Summary for BVSP Area

Land Use Designation	Total Acres
Village Core	18.3
Village Corridor Mixed Use	20.3
Station Core	6.8
Village High Density Residential	5.0
Public Facility	2.7
Park/Plaza	4.0
Total Developable Land	57.2
Total Rights-of-Way	23.5
Total	80.7

Source: City of Belmont 2017b

BVSP Area Land Use Designations

Residential

- **Village High Density Residential (21-45 du/ac):** The Village High Density Residential designation is intended for multifamily buildings and townhomes, and is applied to parcels in the Village's eastern quadrants. The higher densities of this designation may provide market rate and affordable rental and ownership housing opportunities. Typical configurations include townhomes, garden apartments, and stacked flats (apartments or condominiums). Common open space and shared amenities for residents are required within Village High Density Residential developments, as described in the Urban Design Element of the BVSP.

Mixed Use

- **Village Core:** As the primary designation for the western half of the Village, the Village Core allows for high-intensity, mixed-use development. Retail uses, offices, personal services, and entertainment uses are supported to cater to the local community and visitors. Vertical mixed use is strongly encouraged, with high-density residential uses allowed (but not required) above the ground floor only. All development should be designed to be pedestrian-oriented and integrated with the surroundings, consistent with the urban design framework in the Urban Design Element of the BVSP.
- **Village Corridor Mixed Use:** The Village Corridor Mixed Use designation is primarily located in the eastern half of the Village along key corridors, including Ralston Avenue and Old County Road. Uses include offices, services, and lodging uses, and retail is permitted but not encouraged. High-density residential is permitted and encouraged to be developed in a horizontal or vertical mixed-use setting, but it may be developed as a single use subject to the maximum FAR. Publicly accessible community gathering spaces are required, as described in the Urban Design Element of the BVSP.
- **Station Core:** The Station Core designation is limited to the northeastern quadrant and is intended to create an activity center to serve the neighborhoods in and surrounding the eastern portion of the Village. Uses may include small- and medium-scale retail, dining, and entertainment uses. Publicly accessible community gathering spaces are required, and specialty shops, community-oriented spaces and amenities, and entertainment destinations are encouraged. Station Core supports residential uses in a horizontal or vertical mixed-use setting.
- **Active Use Frontage Overlay:** Several streets within the Village Core and Station Core districts are designated Active Use Frontage Overlay. This designation requires that the ground level has uses that are accessible to the general public, are engaging to pedestrians walking by, and generate walk-in pedestrian clientele and thus contribute to a high level of pedestrian activity. Active uses may include, but are not limited to: retail stores, restaurants, cafes, markets, bars, theaters and performing arts venues, parks, plazas, commercial recreation and entertainment, personal and convenience services, tourism-oriented services, banks, childcare services, libraries, museums, galleries, and entrance lobbies to upper-floor residential uses. While office and other less active non-residential uses may be permitted at ground level on an interim basis at the discretion of the Planning Commission, all spaces must be designed to accommodate active uses, as outlined in the Urban Design Element of the BVSP.

Public

- **Park/Plaza:** The Park/Plaza designation provides for public open space areas, including parks and recreation facilities, that are programmed or improved with open space facilities and amenities. Areas with the Park/Plaza designation may include amenities such as play structures, seating, fountains, public art, and special landscape features. Park/Plaza may also include walkways and trails that are part of larger circulation networks. Additional parks, open spaces, and public spaces are required to be provided in development projects as described in the Urban Design Element of the BVSP.
- **Public Facility:** The Public Facility designation provides for public utilities and facilities. It includes government offices, City Hall, community centers, police stations, and fire stations.

Draft Housing Opportunity Sites Zoning Districts

The Draft Housing Opportunity Sites are subject to City Zoning and City General Plan land use designations. Appendix SITE provides the existing zoning and land use designation of each site. The Draft Housing Opportunity Sites are mostly made up of parcels within the zoning districts of Service Commercial, Corridor Mixed Use, Residential Low Density, Residential Medium Density, HIA-1, Village Core, Village Corridor Mixed Use and Station Core.

Sites Outside City Limits (Within the City's Sphere of Influence)

Out of the 144 Draft Housing Opportunity Sites, four are contiguous sites located outside of City limits but within the City's sphere of influence. The sites (sites 80, 83, 136, and 137) are located on the eastern portion of the City and are bordered by Old County Road, O'Neill Avenue, Harbor Boulevard, and Elmer Street. These four sites will be annexed into the City before the adoption of the Housing Element Update in January 2023.

4.10.2 Regulatory Setting

a. State Regulations

Local Agency Formation Commissions

The Cortese-Knox-Hertzberg Local Government Reorganization Act (Cortese-Knox-Hertzberg Act) of 2000 (Government Code Section 56000 et seq.) establishes the process through which local agency boundaries are established and revised. Each county must have a Local Agency Formation Commission (LAFCO), which is the agency that has the responsibility to create orderly local government boundaries, with the goal of encouraging "planned, well-ordered, efficient urban development patterns," the preservation of open-space lands, and the discouragement of urban sprawl. While LAFCOs have no land use power, their actions determine which local government will be responsible for planning new areas. LAFCOs address a wide range of boundary actions, including the creation and modifications of spheres of influence for cities and special districts, annexations, reorganizations, incorporations, and the detachment of areas from special districts. A city's or special district's sphere of influence is an indication of an agency's future growth boundaries.

Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its planning area (Government Code Sections 65300-65404). The

general plan must contain land use, housing, circulation, open space, conservation, noise, and safety elements, as well as any other elements that the city or county may wish to adopt. The circulation element of a local general plan must be correlated with the land use element.

Zoning authority originates from city and county police power and from the State's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, State law has required the city or county zoning code to be consistent with the jurisdiction's general plan. The consistency requirement does not apply to charter cities other than Los Angeles unless the charter city adopts a consistency rule.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act (SB 375) supports the State's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board (CARB) set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a Sustainable Communities Strategy (SCS), as an integral part of its regional transportation plan, that contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet CARB's targets. The Act establishes some incentives to encourage implementation of the development patterns and strategies included in an SCS. Developers can get relief from certain environmental review requirements under the California Environmental Quality Act (CEQA) if their new residential and mixed-use projects are consistent with a regions SCS that meets the targets (see Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28).

b. Regional Regulations

Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) Plan Bay Area 2040¹

Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) Plan Bay Area 2040, adopted in July 2017, is a long-range, integrated transportation and land-use plan for the nine-county San Francisco Bay Area. The Plan is the combined Regional Transportation Plan and Sustainable Communities Strategy (also referred to as the RTP/SCS) and was jointly adopted by the ABAG and the MTC in July 2017. The Plan describes where and how the region can accommodate the projected 820,000 new households and 1.3 million new jobs between 2017 and 2040 and details the regional transportation investment strategy over the next 24 years. Growth in the plan area is promoted in Priority Development Areas and limited in Priority Conservation Areas to promote preservation of key resources. The Plan contains seven goals to address major challenges in the region and has established 13 performance targets to assess the Plan's effectiveness in meeting its goals. ABAG and MTC developed land use and transportation scenarios in the Plan that distribute the total amount of anticipated growth across the region and measure how well each scenario measures against the Plan goals. Based upon performance, the preferred scenario provides a regional pattern of household and employment growth and a corresponding

¹Although Plan Bay Area 2050 was completed and approved in October 2021, the data used in the analyses and projections were not broken down by individual jurisdiction. As a result, this environmental evaluation uses data supplied by the Plan Bay Area 2040 report.

transportation investment strategy (ABAG 2017). ABAG/MTC recently released draft Plan Bay Area 2050 in May 2021, which is expected to be adopted in the fall of 2021.

c. Local Regulations

City of Belmont 2035 General Plan

The City of Belmont 2035 General Plan was adopted in November 2017 and provides guidelines for land use decision-making in the City. The General Plan includes six elements: Land Use, Circulation, Parks, Recreation and Open Space, Conservation, Safety, and Noise. In addition, the Housing Element for 2015-2023 was adopted in May 2015. Together, the Land Use, Housing, and Safety Elements are intended to ensure that adequate land, infrastructure services, and safety measures are provided to accommodate existing and future development.

Land Use Element

The Land Use Element describes existing land use patterns and provides the physical framework for land use and development in the City. The Land Use Element also contains urban design policies to improve the City's visual quality and livability, including its neighborhoods, mixed-use areas, and hillside areas. It describes the economic context and sets out goals and policies to stimulate development, maintain fiscal health, and support other efforts to enhance the City's economy (City of Belmont 2017a).

Housing Element

The Housing Element presents a comprehensive set of housing policies and actions that builds on an assessment of Belmont's housing needs and an evaluation of existing housing programs, available land, and constraints on housing productions. The Housing Element consists of the following components: population and employment trends, housing characteristics and housing stock characteristics, special housing needs, existing assisted housing and potential risk of conversion to market rates, governmental and non-governmental constraints, a detailed site inventory addressing availability and suitability for affordable housing development, opportunities for energy conservation, a review the accomplishments over the last Housing Element cycle, a new housing program with goals, programs, and implementation actions, and quantified objectives that estimate the maximum number of units, by income level, to be constructed, rehabilitated or conserved over the planning period of the element (City of Belmont 2015).

Safety Element

The Safety Element identifies natural and human-made public health and safety hazards that exist within the City, and establishes preventative and responsive policies and programs to mitigate their impacts. The Safety Element addresses seismic and geologic hazards, flooding, fire, related aspects of law enforcement, emergency preparedness, and coordinated response measures. This Element allows for the consideration of hazards in land use designations and their density and intensity standards, and places restrictions on development of hazardous areas (City of Belmont 2017c).

City of Belmont Municipal Code (BMC) and Zoning Ordinance

The BMC establishes regulations that implement the City's General Plan. Chapter 7 of the BMC describes building standards while Chapter 10 describes planning procedures and fee requirements

for new construction. Section 9, *General Regulations*, contains regulations that control the uses of land and the locations, appearances, height, and massing of structures.

The City of Belmont is divided into 24 classes of districts (BMC 2021):

- Single Family Residential: R-1E, R-1H, R-1A, R-1B and R-1C Districts
- Duplex Residential: R-2 Districts
- Multi-family Residential: R-3, R-4 and R-5 Districts
- Hillside Residential and Open Space: HRO-1, HRO-2, and HRO-3 Districts
- Neighborhood Commercial: C-1 Districts
- General Commercial: C-2 Districts
- Regional Commercial: RC District
- Service Commercial: C-4 Districts
- Mixed Use District, Corridor Mixed Use: CMU
- Executive Administrative: E-1, E-2.1 and E-2.2 Districts
- Harbor Industrial Area: HIA-1, and HIA-2 Districts
- Limited Industrial: M Districts
- Exclusive Manufacturing: M.E. Districts
- Special Building Site District No. 1: S-1 or S-2 Combining Districts
- Schools and Compatible Multiple Uses: SC Districts
- Open Space Public: OS-P Districts
- Public and Semi-Public: PS District
- Village Core: VC District
- Village Station Core: VSC District
- Village Corridor Mixed Use: VCMU District
- Village High Density Residential: VHDR District
- Public Facility: PF District
- Park/Plaza: PP District
- Active Use Frontage Overlay: AUFO Overlay

4.10.3 Impact Analysis

d. Methodology and Significance Thresholds

The analysis in this section focuses on environmental impacts from the project's zoning ordinance amendments on the Draft Housing Opportunity Sites, as well as consistency with any applicable land use plans, policies, or regulations. The following thresholds of significance are based on Appendix G of the *CEQA Guidelines*. For purposes of this Program EIR, implementation of the project may have a significant adverse impact if it would do any of the following:

1. Physically divide an established community
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

The consistency analysis describes existing regional and local plans and policies and is intended to fulfill the requirements of *CEQA Guidelines* Section 15125(d). The emphasis of the analysis is on the project's inconsistency and potential conflicts between the project and existing applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect, and whether any inconsistencies are significant environmental effects. The project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the applicable plans and does not conflict with directly applicable policies. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. Courts have also acknowledged that general and specific plans attempt to balance a range of competing interests, and that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan. Additionally, in reaching such consistency conclusions, the City may also consider the consequences of denial of a project, which can also result in other policy inconsistencies. For example, Government Code Section 65589.5 explains that the potential consequences of limiting the approval of housing are reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.

For an impact to be considered significant, an inconsistency would also have to result in a significant adverse change in the environment not already addressed in the other resource chapters of this EIR. The analysis below provides a discussion of the most relevant policies from the various planning documents. However, the City's consistency conclusions are based upon the planning documents as a whole.

Threshold: Would the project physically divide an established community?

Impact LU-1 PROJECT IMPLEMENTATION WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would not result in the construction of barriers, such as new roads or other linear development or infrastructure, that would divide the existing communities surrounding the sites. Short-term construction impacts would be mostly contained within the Draft Housing Opportunity Sites themselves; however, off-site improvements for utilities may be required for some of the sites for water and wastewater (refer to Section 4.16, *Utilities and Service Systems*).

No new transportation infrastructure would be required (refer to Section 4.16, *Transportation*, and Section 4.18, *Utilities and Service Systems*) Therefore, existing roadways would not be blocked, and construction would not limit access to a community or restrict movement within a community.

Development facilitated by the project would not divide a community; rather it would promote the development of existing vacant, underdeveloped or underutilized properties, thereby locating people closer to existing employment, goods and services within an established community. Furthermore, the project's goals and policies would put a greater emphasis on preventing displacement and promoting housing stability to maintain and preserve the City's existing neighborhoods, especially for lower income residents. Impacts related to dividing an established community would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
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Impact LU-2 THE PROJECT WOULD NOT RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH A LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project would provide a framework for introducing new housing at all levels of affordability that is within access to transit, jobs, services, and open spaces. Through its identification of sites for future development and implementation of housing programs, the project would encourage development of up to 3,300 new residential units, as well as address the City's fair share housing needs as quantified in the RHNA.

The project would include a zoning ordinance and map amendment to rezone the SC properties to CMU and VSC and to modify the maximum height from 55 feet to allow structures up to 65 feet in the CMU, and VSC zones, as well as increase FAR in CMU zones.

The following analysis discusses the project's consistency with applicable plans and regulations, including Plan Bay Area 2040 and the City of Belmont 2035 General Plan. Consistency with the General Plan is presented in Table 4.10-3. The project is determined to be either "consistent" or "inconsistent" with the identified goals and policies.

Plan Bay Area 2040

While Plan Bay Area 2040 has a greater focus on the transportation and economic sectors than housing or land-use related policies, Plan Bay Area 2040 does include the following objective regarding housing:

1. Lower the share of income spent on housing and transportation costs, lessen displacement risk, and increase the availability of housing affordable to low- and moderate-income households.

The project would result in an increased availability of housing and affordable housing in the City, following buildout of Draft Housing Opportunity Sites. Additionally, almost half the sites are located in the BVSP area near developed urban sites, resulting in lower transportation costs from proposed housing locations to commercial, retail and office land uses. This would be consistent with the above objective.

City of Belmont 2035 General Plan

The General Plan Land Use Element identifies goals, objectives, and policies for the location and intensity of growth in the City, and the General Plan Housing Element identifies goals, objectives, and policies for the promotion of affordable housing and housing for special needs populations. Detail regarding the project's consistency with specific, relevant General Plan goals, objectives, and policies intended to avoid or mitigate an environmental effect is provided in Table 4.10-3.

As noted under Government Code Section 65589.5(a), the Legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California." More specifically, the Legislature's stated

Table 4.10-3 Project Consistency with Applicable General Plan Goals and Policies

Goal/Policy	Project Consistency
Land Use Element	
Goal 2.1: Promote a diversity of compatible land uses throughout the city, to enable people to live close to job locations, adequate and convenient commercial services, and public services and facilities such as transit, parks, and schools.	
Policy 2.1-2: Coordinate land use and transportation planning to ensure that land use patterns and intensities can be supported by and are accessible to the transportation network, including pedestrian and bicycle facilities. See also Policy 3.1-1 in Circulation Element.	<p>Consistent</p> <p>The project would encourage active transportation (e.g., bicycling and walking) by building new residential units near transit, jobs, services, and open spaces. In addition, development facilitated by the project would adhere to all regulations pursuant to the BMC, General Plan and BVSP that are applicable to developing complete streets that create functional places meeting the needs of pedestrians, bicyclists, wheelchair users, equestrians, and motorists. Therefore, the project would be consistent with this policy.</p>
Goal 2.2: Support the creation and enhancement of “complete neighborhoods” in Belmont, with well integrated single-family and multi-family residential development, pedestrian and bicycle-friendly environments, and activity nodes featuring schools, parks, and neighborhood commercial areas.	
Goal 2.3: Provide balanced neighborhoods with a variety of housing types and density ranges to meet the diverse demographic, economic, and social needs of residents, while ensuring a cohesive urban form and regard for compatibility with surrounding uses and existing residential development.	
Policy 2.3-1: Encourage the provision of lower- and moderate-income housing to meet the objectives of the Housing Element.	<p>Consistent</p> <p>One of the Housing Element’s main goals is to develop more affordable housing in the City. Incentives would be provided to new lower-income housing in the form of a Density Bonus Program pursuant to Section 26 of the Belmont Zoning Ordinance. The program allows for residential densities above the permitted maximum, and allows for developers to request incentives such as a reduction in site development standards or a modification of zoning code and architectural requirements from the City. Furthermore, the City offers two programs to mitigate the impact of development fees on affordable housing. Therefore, the project would be consistent with this policy.</p>
Policy 2.3-2: Encourage higher density residential uses located in close proximity to commercial services, employment opportunities, and major transportation corridors and facilities.	<p>Consistent</p> <p>Most development facilitated by the project would occur in the BVSP area and in urban areas of the City that are within access to transit, jobs and services. In addition, development facilitated by the project would be required to adhere to all regulations pursuant to the BMC, General Plan and BVSP to promote residential uses mixed in conjunction with commercial development. Therefore, the Project would be consistent with this policy.</p>
Policy 2.3-3: Promote residential uses mixed in conjunction with commercial development in Belmont Village Mixed Use and Corridor Mixed Use designations, while ensuring that residential mixed use developments are designed to ensure compatibility between uses.	<p>Consistent</p> <p>Most development facilitated by the project would occur in the BVSP area and in urban areas of the City that are within access to transit, jobs and services. Draft Housing Opportunity Sites along El Camino Real are designated as Village Corridor Mixed Use, which could be developed into office, service, or residential uses. Therefore, the project would be consistent with this policy.</p>

Goal/Policy	Project Consistency
Policy 2.3-4: Focus new development in or directly adjacent to already-developed areas, where it can be served by existing public services and infrastructure.	Consistent The Draft Housing Opportunity Sites are currently on underdeveloped, underutilized, or vacant lots that are adjacent to developed areas. Development facilitated by the project would be served by existing public services and infrastructure and would potentially provide additional open space and amenities. Therefore, the project would be consistent with this policy.
Goal 2.4: Preserve the character and enhance the quality of Belmont’s residential neighborhoods.	
Policy 2.4-1: Promote neighborhood preservation and enhancement while also facilitating development of and improvements to dwelling units in the hillsides, where allowed in the Zoning Ordinance.	Consistent The project would encourage the development of up to 3,300 residences throughout the City. These residences would be constructed in urban areas of the City that are within access to transit, jobs, and services. In addition, development facilitated by the project would be required to adhere to regulations pursuant to the BMC and General Plan that are applicable to promoting neighborhood preservation and enhancement while encouraging development of and improvements to dwelling units in the hillsides. Therefore, the project would be consistent with this policy.
Policy 2.4-2: Maintain adequate and reasonable tree protection and removal standards and best management practices, implemented by the City’s Tree Ordinance.	Consistent As described in Section 4.3, <i>Biological Resources</i> , development facilitated by the project would be required to adhere to regulations pursuant to BMC Chapter 9, Article IV, Section 9-44 regarding the preservation of protected trees, as well as BMC Chapter 25, also known as the City’s Tree Ordinance, regarding the maintenance of tree protection and removal standards and BMPs. Therefore, the project would be consistent with this policy.
Policy 2.4-3: Promote neighborhood preservation and enhance residential areas east of El Camino Real, while also facilitating development of and improvements to dwelling units, where allowed in the Zoning Ordinance.	Consistent As shown in Figure 2-3 in <i>Project Description</i> , there are more than ten Draft Housing Opportunity Sites east of El Camino Real. Development facilitated by the project would adhere to applicable regulations pursuant to the BMC, General Plan and BVSP that are applicable to facilitating development of dwelling units to residential areas east of El Camino Real.
Goal 2.4: Enhance the Belmont Village PDA and develop a distinct identify for the area as Belmont’s vibrant town center for residents and visitors with commercial, residential, dining, civic, cultural, and entertainment activities.	
Policy 2.5-1: Foster a variety of uses and activities in the Belmont Village PDA, including residential, commercial, office, restaurants, and specialty retail shops, to attract residents and visitors from across the region by creating a lively, interesting, social environment.	Consistent The project would encourage housing at various levels of affordability that would support the diverse needs of Belmont’s residents and business. The project would include residential uses located near public transit, services, and open space areas. The amenities associated with development facilitated by the project would provide opportunities for living, employment, recreation and education. Therefore, the project would be consistent with this policy.

Goal/Policy	Project Consistency
Policy 2.5-2: Seek an increased presence of both residents and activity in Belmont Village with new development, including residential as part of mixed-use development, as well as commercial, entertainment, and cultural uses that serve both residents and visitors.	Consistent As discussed above in Policy 2.5-1, the project would encourage housing at various levels of affordability that would support the diverse needs of Belmont’s residents and business. The project would encourage residences located near public transit, services, and open space areas. The amenities associated with development facilitated by the project would provide opportunities for living, employment, recreation and education. Therefore, the project would be consistent with this policy.
Policy 2.5-3: Implement the Belmont Village Specific Plan as the guide for land use planning, design, streetscape, and public improvements in the Belmont Village PDA.	Consistent Development facilitated by the project in the BVSP area would be required to adhere to regulations pursuant to the BMC and BVSP pertaining to design, streetscape, and public improvements. Chapter 4, <i>Urban Design</i> , of the BVSP would provide a framework to ensure new development help establish a distinctive character for the Belmont Village. Therefore, the project would be consistent with this policy.
Policy 2.5-6: Enhance walkability and pedestrian orientation of the Village to create an identity, improve the atmosphere, and improve access to and utilization of transit, in accordance with the Belmont Village Specific Plan. See also Policies in the Circulation Element.	Consistent Development facilitated by the project would be required to adhere to regulations pursuant to the BMC, General Plan and BVSP. Most of the development would occur in the BVSP area along El Camino Real, which is in proximity to transit and contains a variety of land uses from public and community facilities to commercial to residential, which would promote walkability and pedestrian orientation. Therefore, the project would be consistent with this policy.
Policy 2.5-9: Create a clear vision for use of City-owned parcels, especially in the Belmont Village PDA, and utilize these sites as catalyst projects for the surrounding area, with potential development programs grounded in financial feasibility, good design and compatibility, and community desires.	Consistent The Draft Housing Opportunity Sites were selected to maximize efficiency and utilization of underdeveloped, underutilized, and vacant parcels. Development facilitated by the project would be required to adhere to regulations pursuant to the BMC, General Plan and BVSP that are applicable to enhancing walkability and pedestrian orientation of the Village and improving access to and utilization of transit. Therefore, the project would be consistent with this policy. In addition, development facilitated by the project would be required to adhere to regulations pursuant to the BMC, General Plan and BVSP that are applicable to financial feasibility, good design and compatibility, and community desires. Therefore, the project would be consistent with this policy.
Goal 2.8: Promote infill development that makes efficient use of limited land supply, while ensuring compatibility and integration with existing uses.	
Policy 2.8-1: Enable infill properties to develop with uses and development intensities supporting a cohesive development pattern.	Consistent The Draft Housing Opportunity Sites were selected to maximize efficiency and utilization of underdeveloped, underutilized, and vacant parcels, and would support infill development of different uses and intensities in the City. Additionally, development facilitated by the project would be required to adhere to regulations pursuant to BMC and BVSP regarding compatibility and integration with existing uses. As mentioned above in Policy 2.5-3, Chapter 4, <i>Urban Design</i> , of the BVSP contains development standards as well as design guidelines to ensure new development are consistent with the character and identity of the Belmont Village. Therefore, the project would be consistent with this policy.

Goal/Policy	Project Consistency
Goal 2.9: Foster new development that contributes positively to Belmont’s built environment, provides benefits to the local community, and addresses potential impacts.	
Policy 2.9-1: Allow sufficient density and intensity to enable new development to support all required infrastructure, community facilities, and open space.	Consistent Development facilitated by the project would be required to adhere to regulations pursuant to the BMC, General Plan, and BVSP that are applicable to the density and intensity. Since the Draft Housing Opportunity Sites would be located on underdeveloped, underutilized, and vacant parcels, they would be able to support all required infrastructure, community facilities, and open space without exceeding service capacities. Therefore, the project would be consistent with this policy.
Policy 2.9-2: Require that new development “pays its way” so as to limit fiscal impacts on the City.	Consistent Pursuant to BMC Chapter 17 Article III, also known as the impact fee ordinance, development facilitated by the project would be required to adhere to impact fee requirements in order to limit fiscal and other detrimental impacts to the City. Therefore, the project would be consistent with this policy.
Policy 2.9-3: Allow development to exceed established standards only if a tangible and sufficient benefit is provided to the Belmont community.	Consistent Development facilitated by the project would be required to adhere to regulations pursuant to the BMC, General Plan and BVSP that are applicable to allowing development to exceed established standards if a tangible and sufficient benefit is provided to the Belmont community. Since the project would encourage the development of 488 very low-income housing units and 281 low-income housing units, the project would satisfy the requirement of providing significant community benefits. Therefore, the project would be consistent with this policy.
Goal 2.13: Enhance Belmont’s character and image as a desirable community with distinct visual qualities, small-town character, and connections to nature and open space.	
Policy 2.13-1: Ensure that new development is balanced with preservation of open space and natural features.	Consistent Development facilitated by the project would be required to adhere to regulations in the General Plan and BVSP that are applicable to ensuring new development is balanced with preservation of open space and natural features. Furthermore, pursuant to BMC Chapter 17 Article IV, development would be required to dedicate land or pay in-lieu fees to ensure the support and preservation of open space, parks, and recreational facilities. Therefore, the project would be consistent with this policy.
Source: City of Belmont 2017a	

intent is “to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal...to assure that counties and cities will prepare and implement housing elements which...will move toward attainment of the state housing goal” (Government Code Section 65581). The project would help meet the City’s RHNA allocation, as well as efficiently utilize vacant, underutilized, and underdeveloped lots within the City to increase the supply of housing. The project would provide encourage development of housing, which is supportive of the City’s goal and policies.

BMC Consistency

Future development under the project would ensure consistency with zoning for residential uses as described in Chapter 17, Article II, *Planning*, of the BMC.

Upon adoption of the proposed Housing Element Update and General Plan Land Use Map, the project would comply with the land use requirements set forth by ABAG’s 2040 RTP/SCS, the Belmont 2035 General Plan, and the BMC, and therefore, would not result in adverse physical land use impacts.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.10.4 Cumulative Impacts

A project’s environmental impacts are “cumulatively considerable” if the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative land use and planning impacts includes the geographic area of the City of Belmont. Development that is considered part of the cumulative analysis includes buildout of the City’s General Plan and buildout of adopted specific plans including the BVSP.

Cumulative development in accordance with the City’s General Plan would incrementally modify land use patterns and the general setting of the City. Planned cumulative development would incrementally increase overall development intensity throughout the City. However, land use and policy consistency impacts associated with buildout of the City’s General Plan would be addressed on a case-by-case basis to determine consistency with applicable plans and policies. Since the planned projects would be required to be consistent with the General Plan, they would implement the City’s vision for Belmont. In addition, these projects would generally reduce motor vehicle trips, trip lengths, and associated environmental impacts by being constructed near transit, jobs, services, and open spaces. Because the project’s impacts related to land use compatibility and consistency with local plans and goals would be less than significant, the project’s contribution to cumulative land use impacts would be less than significant.

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4.11 Noise

This section analyzes noise-related impacts associated with the implementation of the proposed project, including temporary noise impacts from construction activity and long-term noise impacts from expected operation of development facilitated by the project.

Overview of Noise and Vibration

Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

HUMAN PERCEPTION OF SOUND

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans 2013).

SOUND PROPAGATION AND SHIELDING

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a “sound power level” or a “sound pressure level,” which are two distinct characteristics of sound. Both share the same unit of measurement, the dB. However, sound power (expressed as L_{pw}) is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source

(e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA’s guidance indicates that modern building construction generally provides an exterior-to-interior noise level reduction of 10 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011).

DESCRIPTORS

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}), and the Day-Night Average Level (DNL; may also be symbolized as L_{dn}).

L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a time period. When no time period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (DNL or L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.).¹ The relationship between the peak-hour L_{eq} value and the L_{dn} depends on the distribution of noise during the day, evening, and night. Quiet suburban areas typically have L_{dn} noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60+ dBA L_{dn} range (FTA 2018).

Groundborne Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak

¹ Because DNL is typically used to assess human exposure to noise, the use of A-weighted sound pressure level (dBA) is implicit. Therefore, when expressing noise levels in terms of DNL, the dBA unit is not included.

particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation. The American Association of State Highway and Transportation Officials (AASHTO) has determined vibration levels with potential to damage nearby buildings and structures; these levels are identified in Table 4.11-1.

Table 4.11-1 AASHTO Maximum Vibration Levels for Preventing Damage

Type of Situation	Limiting Velocity (in/sec)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5
in/sec = inches per second; PPV = peak particle velocity	
Source: Caltrans 2020	

Numerous studies have been conducted to characterize the human response to vibration. The vibration annoyance potential criteria recommended for use by Caltrans, which are based on the general human response to different levels of groundborne vibration velocity levels, are described in Table 4.11-2.

Table 4.11-2 Vibration Annoyance Potential Criteria

Human Response	Vibration Level (in/sec PPV)	
	Transient Sources	Continuous/Frequent Intermittent Sources ¹
Severe	2.0	0.4
Strongly perceptible	0.9	0.10
Distinctly perceptible	0.25	0.04
Barely perceptible	0.04	0.01
¹ Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.		
in/sec = inches per second; PPV = peak particle velocity		
Source: Caltrans 2020		

4.11.1 Project Noise Setting

Noise within Belmont

According to the Belmont General Plan Noise Element, the primary sources of noise within Belmont city limits are vehicle traffic on the roadways and on Highway 101, diesel trains on the Caltrain commuter rail line, and airport noise (Belmont 2017).

Traffic is the most extensive noise problem faced by Belmont. The greatest existing source of noise from traffic is Highway 101, which also has the greatest projected future traffic noise generation. The major cross-town streets with high levels of traffic noise also include El Camino Real, Ralston Avenue, Cipriani Boulevard, and Alameda de las Pulgas. The residential neighborhoods around and to the east of El Camino Real and directly adjacent to Ralston Avenue can experience minimum noise levels above 60 dB L_{dn} , which is above the typical “normally acceptable” range of noise for single-family residential areas. Future noise projections depicted in the General Plan show an overall increase in noise levels around every current noise source, especially Highway 101, Ralston Avenue west of Alameda de las Pulgas, and El Camino Real (Belmont 2017). The Draft Housing Opportunity Sites in relation to the projected future noise contours within Belmont are displayed in Figure 4.11-1.

The diesel-powered Caltrain commuter rail line runs parallel to El Camino Real and is used both by Caltrain and by Union Pacific freight trains, with freight trains passing generally in the late evening or early morning. The noise generated by the trains is much less substantial than roadway and vehicle traffic in Belmont (Belmont 2017). Electrification of the Caltrain is expected to be completed in coming years, which will reduce rail noise further.

San Carlos Airport is located in the City of San Carlos, approximately 0.7 mile east of the nearest Draft Housing Opportunity Sites and is designated as a reliever airport for San Francisco International Airport. Projected future noise contours for the airport through 2035 show small portions of the 60 dB contour extending into portions of southern Belmont, but not over any of the Draft Housing Opportunity Sites (Belmont 2017). San Francisco International Airport is located approximately 10 miles north of Belmont. According to its noise exposure maps, noise contours above 60 dB CNEL attributable to the airport do not extend into Belmont (San Francisco International Airport 2015).

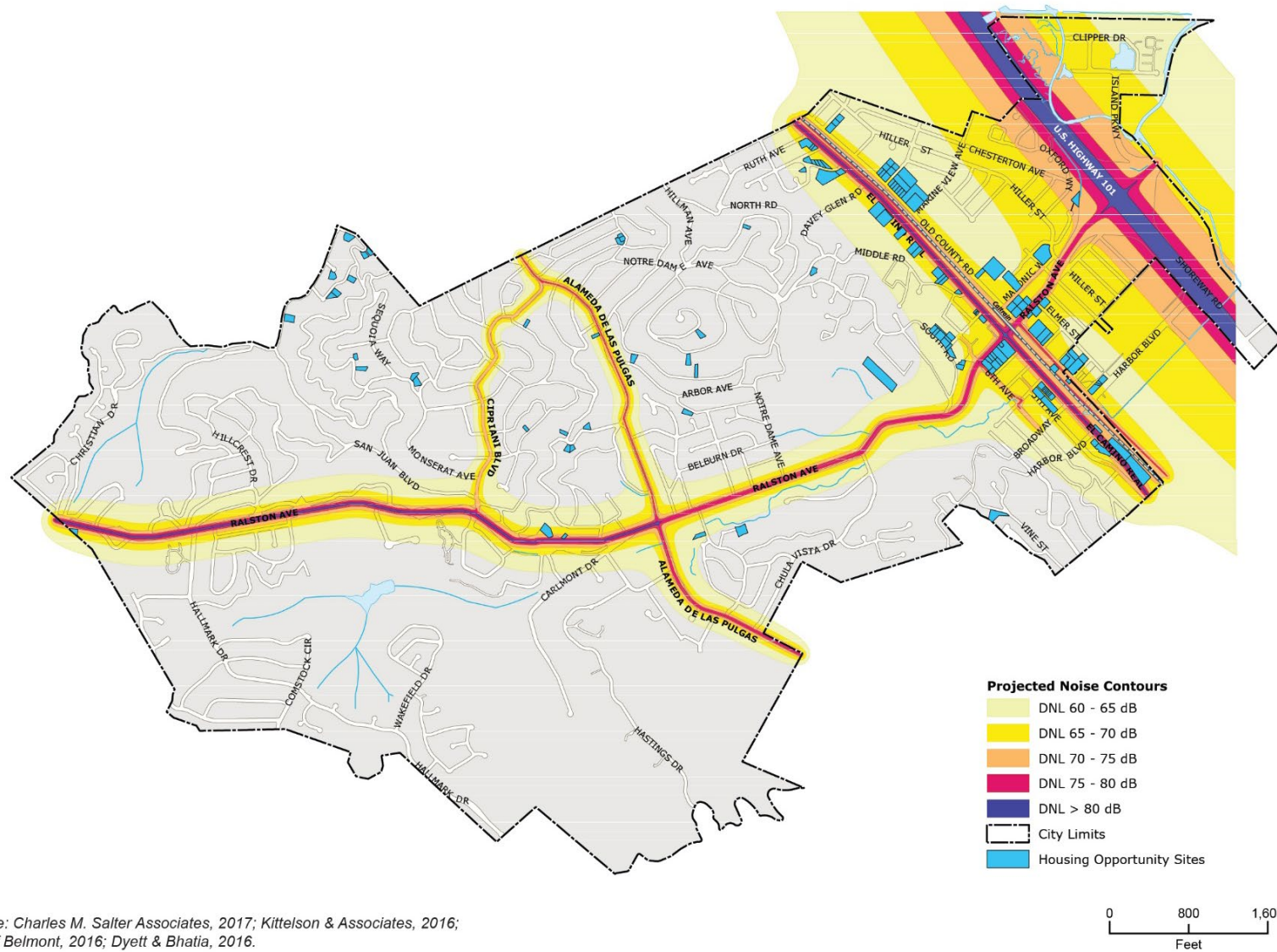
Stationary sources of noise within Belmont include noise generated by residential activity and machinery or processes at commercial or industrial uses, including car washes, and automotive repair facilities. A primary source of stationary noise is the use of heating, ventilation, and air conditioning (HVAC) units.

Sources of vibration in the city arise from traffic and trains as well; like vehicle noise, vehicular vibration can affect receivers along roadways and depends on pavement and type and weight of the vehicle. Vibration may also be generated by construction equipment (e.g., earth-moving equipment and pile driving); however, these sources are temporary and would vary on a project-by-project basis. More permanent, but intermittent, vibration may also be generated by railroad and airport operations, which would affect communities adjacent to these facilities. In addition, commercial or industrial activities may generate vibration from the use of heavy equipment (e.g., businesses that recycle construction debris).

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The Belmont General Plan Noise Element identifies noise-sensitive land uses as locations where people reside or where the presence of unwanted sound could adversely affect the use of the land, including places where people live, sleep, recreate, worship, and study (City of Belmont 2017). Vibration sensitive receivers are similar to noise-sensitive receivers and also include historical resources.

Figure 4.11-1 Projected Future Noise Contours and Draft Housing Opportunity Sites



Source: Charles M. Salter Associates, 2017; Kittelson & Associates, 2016;
City of Belmont, 2016; Dyett & Bhatia, 2016.

Potential sensitive receivers who may be impacted by development facilitated by the project would primarily consist of residential uses located near the Draft Housing Opportunity Sites. In particular, development facilitated by the project within the Belmont Village PDA would be surrounded by sensitive receivers due to the built-out nature of the Belmont Village and the city downtown area. Other potential sensitive receivers include parks such as Twin Pines Park, schools including Notre Dame de Namur University and the Nesbit Elementary and Middle Schools, and churches, such as, St. Mark Catholic Church. Sensitive residential districts also lie alongside the main roads projected to see traffic increases due to development facilitated by the project. Impacts from development of the Draft Housing Opportunity Sites are discussed below under *Impact Analysis*.

4.11.2 Regulatory Setting

a. Federal Regulations

Department of Housing and Urban Development

The federal Department of Housing and Urban Development (HUD) sets environmental criteria and standards in Title 24 of the Code of Federal Regulations (CFR), Part 51. New construction proposed in areas that exceed 65 dBA L_{dn} must incorporate noise attenuation features to maintain interior noise levels at 45 dBA L_{dn} . Development in areas exceeding 65 dBA L_{dn} requires further attenuation features. In general, the HUD regulations match the California state regulations discussed below.

Federal Transit Administration

The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential, commercial, and industrial uses, the daytime noise threshold is 80 dBA L_{eq} , 85 dBA L_{eq} , and 90 dBA L_{eq} for an 8-hour period, respectively.

The FTA also uses noise vibration criteria for buildings with noise sensitive uses near railroads. The standards set thresholds at 80 VdB for infrequent vibration events (less than 30 events from the same source per day). These standards would apply to Draft Housing Opportunity Sites located around El Camino Real and the Caltrain rail line.

Federal Aviation Administration

The Federal Aviation Administration (FAA) enforces Title 14, Part 150 of the CFR, which governs airport noise compatibility programs and identifies land uses that are normally compatible with various levels of noise exposure. The FAA has determined that sound levels up to 45 dB CNEL are acceptable within residential buildings. As discussed in *Project Noise Setting* above and under criteria c below, none of the Draft Housing Opportunity Sites are located within noise contours from San Carlos Airport that would require implementation of the FAA standards.

b. State Regulations

California Building Code

CCR Title 24, Building Standards Administrative Code, Part 2, Chapter 12, and the California Building Code codify the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources and

interior noise sources from separate areas. The regulations specify that interior noise levels shall not exceed 45 dB L_{dn} in any habitable room, as well as specifying sound transmission class requirements for walls, floors, and ceilings around sleeping units.

California Green Building Code

California Green Building Standards Code 2016 (CalGreen) Section 5.507.4, Acoustical Control, regulates construction within the 65 dBA L_{dn} contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1 “buildings exposed to a noise level of 65 dB L_{eq} (1-hr) during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method (CalGreen Section 5.507.4.1) or performance method (CalGreen Section 5.507.4.2).

- Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30.
- Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source shall be constructed to provide an interior noise environment that does not exceed 50 dB L_{eq} -1-hour in occupied areas during hours of operations.

California General Plan Guidelines

State law requires general plans to include a Noise Element under Government Code Section 65302(f). The California General Plan Guidelines, Appendix D, published by the Governor’s Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community’s sensitivity to noise, and the community’s assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the authority to set specific noise standards based on local conditions.

Caltrans Ground Borne Vibration Guidelines

The Transportation and Construction Vibration Guidance Manual provides guidance on vibration issues associated with the construction, operation, and maintenance of Caltrans projects. These guidelines address vibration criteria and establish thresholds for vibration-related annoyance to people, vibration-related damage to structures, and vibration-related adverse effects to sensitive equipment. This manual also addresses vibration prediction and screening assessment for construction equipment, methods that can be used to reduce vibration effects from transportation and construction sources, general procedures for addressing vibration issues, and vibration measurement and instrumentation. Guidelines and procedures provided in this manual should be treated as screening tools for assessing the potential for adverse effects related to human perception and structural damage (CalTrans 2020).

c. Local Regulations

City of Belmont General Plan

The City of Belmont Noise Element establishes programs and policies that are designed to include noise control in the planning process in order to mitigate potential impacts through both preventative and responsive measures and adheres to the State Guidelines on utilizing noise contours to guide patterns of land usage. The Noise Element also supports the Belmont Community Vision values as defined in the General Plan, specifically supporting that:

“Belmont’s small-town ambiance sets itself apart as a tranquil, inclusive, safe and desirable place to live, work, and play”

“Our wooded residential areas are diverse, peaceful, and well maintained”

The Noise Element establishes the following goals and policies that would apply to development facilitated by the project:

Goal 7.1 Strive to achieve an acceptable noise environment for the environmental, health, and safety needs of present and future residents of Belmont.

Action 7.1-1a: Continue to limit hours for certain construction and demolition work to reduce construction-related noise exposure.

Policy 7.1-2: Use the Community Noise Exposure Standards [shown below in Table 4.11-4] as review criteria for new land uses. Require all new development that would be exposed to noise greater than the “normally acceptable” noise level range to reduce interior noise through design, sound insulation, or other measures.

Policy 7.1-3: Require noise-reducing mitigation to meet allowable outdoor and indoor exposure standards [in Table 4.11-4]. Noise mitigation measures that may be approved to achieve these noise level targets include but are not limited to the following:

- Construct façades with substantial weight and insulation
- Use sound-rated windows for primary sleeping and activity areas
- Use sound-rated doors for all exterior entries at primary sleeping and activity areas
- Use minimum setbacks and exterior barriers
- Use acoustic baffling of vents for chimneys, attic and gable ends; and • Install a mechanical ventilation system that provides fresh air under closed window conditions

Policy 7.1-4: Exclude residential and noise-sensitive uses located in the Belmont Village PDA from outdoor noise standards [in Table 4.11-4] where it is determined application of noise mitigation measures will be detrimental to the realization of the General Plan’s goals and policies to realize a vibrant activity center in the Village.

Policy 7.1-5: Ensure that building regulations require that noise-generating appliances serving new multi-family or mixed-use residential development are located or adequately insulated to protect residents from the noise.

Policy 7.1-8: Continue to enforce applicable Federal and State Noise Insulation Standards (CCR, Title 24) and noise requirements.

Policy 7.1-10: Require developers of new development anticipated to generate a substantial amount of vibration during construction to implement mitigation practices to reduce vibration.

Policy 7.1-11: Require development projects to include mitigation measures to protect the development from ground borne vibration from the railway if located within 120 feet of the centerline of Caltrain rail tracks.

Goal 7.2 Protect noise-sensitive land uses, such as schools, hospitals, and senior care facilities, from encroachment of and exposure to excessive levels of noise.

Policy 7.2-1: Use the noise-sensitive land uses and transportation noise sources tables [Table 4.11-3 and Table 4.11-4] and Future Noise Contours map as criteria to determine acceptability of noise-sensitive land uses. Do not permit new noise-sensitive uses—including schools, hospitals, and places of worship—where noise levels are “normally unacceptable” or higher if alternative locations are available for the uses in the city.

Goal 7.3 Continue to work with other agencies, airports, and jurisdictions to reduce noise levels in Belmont created by their operations.

Policy 7.3-1: Work with Caltrans, Caltrain, SamTrans, and other agencies to mitigate transportation-related noise impacts on residential areas and sensitive uses. This may include encouraging installation of sound barriers or bus stop relocation in selected locations.

Policy 7.3-2: Continue to work with the San Carlos Airport in improving and implementing its noise abatement program.

Table 4.11-3 Transportation and Stationary Noise Limits

Noise-Sensitive Land Use ²	Outdoor Activity Areas ¹ (dBA CNEL)	Interior (dBA CNEL)	Interior (dBA Leq)
Single-Family Residential	60	45	NA
Multi-family Residential	65	45	NA
Transient Lodging, Motel, Hotel	65	45	NA
Hospital, Nursing Home	65	45	NA
Auditorium, Theater, Music Hall	NA	NA	35
Churches, Meeting Halls	65	NA	45
Office Buildings	NA	NA	45
Schools, Libraries, Museums	NA	NA	45

¹ Outdoor activity areas generally include backyards of single-family residences and outdoor patios, decks, or common recreation areas of multi-family residences.

² As determined for a typical worst-case hour during periods of use

dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; Leq = steady state sound level

Source: City of Belmont 2035 General Plan (2017)

Table 4.11-4 Community Noise Exposure Matrix

Land Use Category	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴
Residential-Low Density Single family, Duplex, Mobile Home	50-60	55-70	70-75	75-85
Residential- Multi-family	50-65	60-70	70-75	75-85
Transient Lodging, Motel, Hotel	50-65	60-70	70-80	80-85
School, Library, Church, Hospital, Nursing Home	50-70	60-70	70-80	80-85
Auditorium, Concert Hall, Amphitheater	NA	50-70	65-85	NA
Sports Arena, Outdoor Spectator Sports	NA	50-75	70-85	NA
Playground, Neighborhood Park	50-70	NA	67.5-75	72.5-85
Golf Course, Riding Stable, Water Recreation, Cemetery	50-75	NA	70-80	80-85
Office Buildings, Businesses Commercial and Professional	50-75	67.5-72.5	70-80	NA
Industrial, Manufacturing, Utilities, Agriculture	50-75	70-80	75-85	NA

¹ Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

² Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

³ Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

⁴ Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California Draft General Plan Guidelines, 2015 and City of Belmont General Plan (2017)

Belmont Village Specific Plan

General Plan Policy 7.1-4 in general exempts development within the PDA from exterior noise standards contained within the General Plan and City Code; however, the Belmont Village Specific Plan contains goals and policies related to interior noise levels and noise mitigation specific to the PDA. These include:

Goal 6.5 Maintain a healthy noise environment in the Belmont Village Planning Area while accommodating the increased intensities and mix of uses intended to characterize Belmont Village in the future.

Policy 6.5-1: Require residential and other noise-sensitive land uses [within] 65 dB contours, to incorporate adequate noise attenuation into the design and site planning of the project in order to achieve an interior noise level of not more than 45 dBA. Ensure that adequate noise attenuation methods are incorporated in new development prior to the issuance of building permits.

Policy 6.5-2: Require projects in the Belmont Village Planning Area to incorporate noise mitigations to strive to achieve City standards for exterior noise levels. However, after incorporating noise mitigations, if a project still cannot achieve City standards for exterior noise levels, as determined by acoustical analysis by a licensed acoustical engineer, project sponsors may apply for an exception to City exterior noise standards.

Policy 6.5-3: Require developers to mitigate noise exposure to sensitive receptors from construction activities. Mitigation may include a combination of techniques that reduce noise generated at the source, increase the noise insulation at the receptor, or increase the noise attenuation as noise travels from the source to the receptor (e.g., through the incorporation of barriers).

City of Belmont City Code

To implement the City’s noise policies, the City adopted Chapter 15, Article 8, Noise Control (the Noise Ordinance) in the Belmont City Code (BCC). The City’s Noise Ordinance states that it is the City’s policy to “protect the peace, health, and safety of its citizens from unreasonable noises from all sources.” PMC Section 15-102 establishes exterior noise standards for designated noise zones, shown in Table 4.11-5. The standards are provided for “daytime” and “nighttime” hours. Daytime is defined in the BCC as 8:00 a.m. to sunset, Monday through Friday, and 10:00 a.m. to sunset on Saturdays, Sundays, and holidays. Nighttime is defined as the period outside daytime hours. Any source of sound emanating from private property in excess of the sound level limits constitutes a noise disturbance.

Table 4.11-5 Exterior Noise Standards

Noise Zone	Time Interval	Allowable Noise Level (dBA Leq)
1 –Residential	Daytime	65
	Nighttime	55
2 – Multi-Family Residential (Interior Standard Only)	Daytime	45
	Nighttime	35
3 – Non-Residential	Daytime	65
	Nighttime	55

dBA = A-weighted decibel; Leq =steady state sound level

Source: Adapted from BCC Sections 15-102 (c) (Sound Level Limits).

BCC Section 15-102(c)(4) further states that the standards shall be lowered by 5 dBA for “noise containing a steady, audible tone such as a whine, screech, beating, pulsating, throbbing, or hum.”

BCC Section 15-102(d) regulates construction noise. Construction and related activities which require a city permit are allowed only during the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday except Holidays, and 10:00 a.m. to 5:00 p.m. on Saturday. The Building Official may allow exceptions to these times for specific circumstances or if the construction will be occurring more than 300 feet from any dwelling unit. The Code further specifies that all gasoline-powered construction equipment shall be equipped with an operating muffler or baffling system and no modification to these systems is permitted.

NOISE LEVEL INCREASES OVER AMBIENT NOISE LEVELS

The noise limits used in this analysis are set at reasonable levels at which a substantial noise level increase as compared to ambient noise levels would occur. Operational noise limits are typically lower than construction noise limits to account for the fact that permanent noise level increases associated with continuous operational noise sources typically result in adverse community reaction at lower magnitudes of increase than temporary noise level increases associated with construction activities that occur during daytime hours and do not affect sleep. The City of Belmont does not specify separate standards for operational and construction noise, only absolute limits based on

type of land use. Therefore, an increase in ambient noise levels that exceeds these absolute limits would also be considered a substantial increase above ambient noise levels. As such, a separate evaluation of the magnitude of noise level increases over ambient noise levels when that increase does not exceed the absolute standards would not provide additional analytical information regarding noise impacts and therefore is not included in this analysis.

4.11.3 Impact Analysis

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, noise and vibration impacts from development facilitated by the project would be significant if they would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
2. Generate excessive groundborne vibration or groundborne noise levels
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels

Specific thresholds of significance for construction, operation, vibration, and land use compatibility are therefore:

Construction Noise

Construction noise that occurs outside the hours detailed in BCC Section 15-102 without an appropriate exemption from the City or exceeds the daytime noise limits in Table 4.11-5 would be significant.

Operational Noise

For traffic-related noise, impacts would be significant if the project would result in exposure of sensitive receptors to an unacceptable increase in noise levels. As described under *Overview of Noise and Vibration* above, a doubling of sound power (increase of 3 dB) is considered 'barely perceptible' to the human ear, while an increase of 5dB is considered 'readily perceptible'. For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more (barely perceptible) if the locations are subject to noise levels in excess of 60 dBA CNEL for exterior areas or 45 dBA CNEL for interior noise levels, or by 5 dBA or more (readily perceptible) if the locations are not subject to noise levels in excess of the aforementioned standards. Many of the Draft Housing Opportunity Sites are located within areas subject to noise in excess of 60 dBA CNEL (see Figure 4.11-1) and so this analysis uses the stricter limit of 3dBA for the purposes of the entire analysis rather than conduct separate analysis for Draft Housing Opportunity Sites which may lie outside such areas.

Vibration

The City has not adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) is used to evaluate potential construction vibration impacts related to both potential building

damage and human annoyance. Construction vibration impacts from housing development would be significant if vibration levels exceed the Caltrans criteria shown in Table 4.11-1 and Table 4.11-2, using the lower range of the thresholds. For example, impacts would normally be significant if vibration levels exceed 0.2 in./sec. PPV for residential structures and 0.5 in./sec. PPV for commercial structures. This is the limit where minor cosmetic (i.e., non-structural) damage may occur to these buildings. However, groundborne vibration would also have the potential to impact structures near a site with historic significance at much lower levels. Therefore, for a conservative analysis to these buildings, construction vibration impacts would be significant if vibration levels exceed 0.12 in./sec. PPV for extremely fragile historic buildings, as shown in Table 4.11-1. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.25 in./sec. PPV, which is the limit where vibration becomes distinctly perceptible to most humans.

Land Use Compatibility

As stated in the Belmont General Plan Policy 7.2-1, new noise-sensitive uses will not be placed where noise levels are “normally unacceptable” or higher if alternative locations are available for the uses in the city. A major exception to this is Policy 7.1-4, which exempts development within the Belmont Village PDA from noise standards if it is “determined application of noise mitigation measures will be detrimental to the realization of the General Plan’s goals and policies to realize a vibrant activity center in the Village.”

Airport Noise

Exposure to airport noise would be significant if development facilitated by the project is located within the 65 dBA CNEL noise contour identified in the Belmont General Plan Noise Element for the San Carlos Airport (Belmont 2017, SFIA 2015).

b. Methodology

Construction Noise

For assessment purposes, noise levels for common construction equipment provided in the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document were used to analyze potential noise levels associated with future development facilitated by the project.

Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Each phase of construction has its own noise characteristics due to specific equipment mixes; some will have higher continuous noise levels than others and some may have high-impact intermittent noise levels (FTA 2018). Therefore, construction noise levels may fluctuate depending on the type of equipment being used, construction phase, or equipment location. In typical construction projects on vacant sites, grading activities typically generate the highest noise levels because grading involves the largest equipment and covers the greatest area.

Variation in power imposes difficulty in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2018). It is very common for programmatic analysis such

as this to utilize a conservative standard reference distance of 50 feet for development occurring in urban areas; project-specific noise analysis might use more specific values and it would be uncommon for there to be multiple pieces of heavy equipment operating together so close to a nearby property line for very long.

Heavy construction equipment during grading and site preparation for development facilitated by the project would typically include bulldozers, excavators, front-end loaders, dump trucks, and graders. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location due to the different tasks performed by each piece of equipment. In addition, construction equipment would not be in constant use during the 8-hour operating day.

Impact devices such as pile drivers may be used for construction of development facilitated by the project. Although use of pile drivers is uncommon during construction for the type of development facilitated by the project, this analysis considers the potential for use of this equipment as a conservative analysis as some terrain features at Draft Housing Opportunity Sites may require their use. A pile driver is used to drive foundation piles into the ground. These devices would typically operate separately from other equipment. Typical noise levels associated with the types of heavy equipment most likely to be utilized during development associated with the project are given in Table 4.11-6 below.

Table 4.11-6 Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Concrete Mixer	85
Dozer	85
Grader	85
Jackhammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Truck	84

Sources: FTA 2018

On-Site Operational Noise

The primary on-site noise sources associated with operation of residential units, and those discussed in this analysis, would include noise from stationary heating, ventilation, and air conditioning (HVAC) equipment, on-site vehicle movement (e.g., trash hauling), and outdoor activities.

Specific planning data for HVAC systems are not available at this stage of analysis; however, for a reasonable analysis, a typical to larger-sized residential condenser was used to determine project HVAC noise. The unit used for this analysis is a Carrier 38HDR060 split system condenser. The manufacturer's noise data lists the unit as having an A-weighted sound power level of 72 dBA and a sound pressure level of 57 dBA at a distance of five feet (Carrier 2011).

Off-Site Operational Noise

Residential development facilitated by the project would be expected to generate vehicle trips, thereby increasing off-site traffic on area roadways. The project's off-site traffic noise impacts are analyzed based on data from the VMT Impact Assessment conducted by Kittelson and Associates (Kittelson) dated January 2022, which is included as Appendix TRA. The overall increase in traffic noise was estimated using the VMT data from the VMT Impact Assessment for existing conditions (based on 2019), future without project conditions (i.e., 2040 without the Housing Element Update), and future with project conditions (i.e., Year 2040 with the Housing Element Update).

Groundborne Vibration

Development facilitated by the project, being entirely residential, would not include any substantial vibration sources associated with operation. Therefore, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation. The greatest vibratory source during construction activities would be anticipated to be a dozer; however, an impact pile driver may be used during specific construction phases, if required, and, if so, would generate higher vibration than a large bulldozer. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020; FTA 2018). Table 4.11-7 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Because groundborne vibration could cause physical damage to structures and is measured in an instantaneous period, vibration impacts are typically modeled based on the distance from the location of vibration-intensive construction activities, which is conservatively assumed to be edge of a project site, to the edge of the nearest off-site structures. For assessment purposes, potential vibration impacts from construction activities were modeled at a reference distance of 25 feet to conservatively analyze potential vibration levels impacting humans moving near the development sites, especially in the denser Belmont Village PDA and City center, as well as the possibility for impacts to historic structures should they be adjacent to a Draft Housing Opportunity Site, such as those identified in Section 4.4, *Cultural Resources* as being near Draft Housing Opportunity Sites along El Camino Real. Equipment operating so closely to property lines for other than brief periods would be very unlikely and based on equipment size and operating room any operation closer than 25 feet to property lines or sensitive receivers would be difficult.

Table 4.11-7 Typical Vibration Levels for Construction Equipment

Equipment	PPV (in./sec.) at 25 Feet
Pile Driver (Impact)	0.644
Pile Driver (Sonic)	0.170
Large Bulldozer	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Sources: FTA 2018; Caltrans 2020	

c. Impact Analysis

As discussed above in *Methodology*, the primary categories of noise impacts from development facilitated by the project would be construction noise, on-site operational noise associated with the regular function of new residential units, off-site noise primarily associated with increased traffic, and land-use compatibility impacts.

Threshold:	Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
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Impact NOI-1 DEVELOPMENT FACILITATED BY THE PROJECT OUTSIDE THE BELMONT VILLAGE PDA COULD INVOLVE CONSTRUCTION WITH LONGER DURATIONS, SUBSTANTIAL SOIL MOVEMENT, OR USE OF LARGE, HEAVY-DUTY EQUIPMENT NEAR NOISE-SENSITIVE LAND USES THAT WOULD EXCEED THE DAYTIME NOISE LIMITS AND RESULT IN SIGNIFICANT IMPACTS EVEN WITH IMPLEMENTATION OF MITIGATION. THEREFORE, IMPACTS GENERATED BY TEMPORARY CONSTRUCTION NOISE WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction Noise

Although all the Draft Housing Opportunity Sites are currently zoned such that development could occur under existing conditions, development facilitated by the project may have longer construction durations than development allowed by current zoning, especially on sites that would be rezoned or that would have increased height allowances. Therefore, although impacts related to construction noise have been examined in the City's General Plan EIR, this analysis conservatively assumes that construction activities would be greater than what could occur under existing conditions.

As described in Table 4.11-6, above, noise levels for typical construction equipment that would be used for residential development facilitated by the project often exceeds 80 dB at 50 feet, assuming no intervening barriers or mitigation has been applied. As discussed under Overview of Noise and Vibration above, noise levels decrease with distance and with the presence of obstructions between the noise source and the receiver.

The noise levels for development facilitated by the project would depend on a wide variety of site-specific factors including distance to nearest sensitive receivers, presence or lack of intervening barriers whether artificial or natural, the equipment mix used during each phase of construction, duration of equipment use, time of day of construction, and other factors which cannot be identified with any accuracy at a program-level analysis. Adherence to the construction hour and noise mitigation requirements described in the city's noise ordinance, as well as the application of project-specific mitigation measures determined through the application of Specific Plan Policy 6.5-3, such as the use of temporary sound barriers or siting and baffling of stationary construction equipment as far from sensitive receivers as possible, would serve to reduce construction-related noise impacts to the greatest extent feasible. Nonetheless, even with measures applied it may not be feasible or even possible to mitigate all construction noise for every development project to less-than-significant levels that would fall below the standards in the City's noise ordinance. Nor is it possible in this program-level analysis to identify every type of development that may generate noise levels above those currently examined in the General Plan EIR due to rezoning, density increases or height increases, or to determine a mixture of mitigation strategies that would be applicable to all such potential development.

By its nature, construction noise is temporary and most likely would occur during weekday hours when disruption to sensitive receivers would be least significant and would not be expected to last for an unusually long durations for residential development of the type expected to be facilitated by the project. However, such transient noise still might cause disruption, and even with mitigation such as required by Specific Plan Policy 6.5-3, not all construction noise levels may be reduced to less-than-significant levels. Therefore, these impacts would remain significant and unavoidable.

Impact NOI-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN A SUBSTANTIAL INCREASE IN AMBIENT NOISE LEVELS FROM OFF-SITE INCREASES IN TRAFFIC VOLUMES. PERMANENT IMPACTS TO AMBIENT NOISE LEVELS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As stated under Impact NOI-1, although all the Draft Housing Opportunity Sites are currently zoned such that development could occur under existing conditions, development facilitated by the project may involve operational noise greater than currently allowed under existing conditions, primarily from projected increases in traffic volumes. Therefore, although impacts related to operational noise have been examined in the City's General Plan EIR, this analysis conservatively assumes that operational noise would be greater than what could occur under existing conditions.

Operational On-Site Noise

As discussed under *Methodology*, above, the loudest operational noise from development on the Draft Housing Opportunity Sites would typically be the operation of HVAC units as these are generally the largest mechanical uses in residential sites. As described above, a common unit could be expected to generate approximately 72 dB. Development that is currently allowed on the sites would use this type of unit, as would development facilitated by the project. For large buildings, such units are typically located on the roof, where operational noise is greatly reduced by distance and the intervening building itself; however, for smaller buildings including smaller multi-family residential units (less than four stories), large HVAC units are often placed at ground level on a concrete pad adjacent to the building. As the project would increase maximum allowed heights in certain locations and density, HVAC units used in development facilitated by the project would most likely be roof-mounted units that create less operational noise than units on the ground. Therefore, the project would not increase the amount or nature of HVAC units analyzed in the City's General Plan EIR and, by increasing the likelihood of rooftop siting, may in fact reduce the potential noise impacts from HVAC units.

It is also unlikely that such units would be sited so close to a neighboring sensitive receiver that they would cause noise levels to exceed the standards of the City Noise Ordinance. Within the Belmont Village PDA, development facilitated by the project would exempt from the noise ordinances under General Plan Policy 7.1-4; development would not be different than allowed under existing conditions. Any HVAC units proposed for development facilitated by the project would also be required to comply with the exterior noise standards of the Noise Ordinance shown in Table 4.11-5. Therefore, the increase in ambient noise levels from operational use of residential-scale HVAC units would be less than significant.

Traffic Noise

As described under *Methodology* above, traffic noise impacts were estimated from the Kittelson VMT Impact Assessment dated January 2022 and included as Appendix TRA. The impact assessment estimated both total VMT would be 692,223 and per capita VMT would be approximately 14.99

under 2040 conditions facilitated by the project, representing an increase of approximately 209,430 annual VMT, or 43 percent from existing conditions.

The threshold of significance for traffic noise throughout the entire city is 3 dBA, or an approximate doubling of traffic volume, which is the barely perceptible limit of human ear response to noise level changes.

The Impact Assessment indicates that eight of the 14 TAZs analyzed throughout the City would see VMT increases of 2 percent or less as a result of development facilitated by the project and three would see increases of between 19 and 40 percent. For Draft Housing Opportunity Sites within these eleven TAZs, impacts from traffic noise would be less than significant. The Impact Assessment further indicates that three of the TAZs would see increases between 72 and 100 percent. The three TAZs with the highest VMT increase would be those with the possibility of a significant noise impact from traffic, and the TAZ with an estimated 100 percent increase in VMT would exceed the significance threshold established. The nearly 100 percent increase in overall VMT in the three identified TAZs would indicate a doubling in traffic volume which would result in a 3 dBA increase in noise levels. Due to the infeasibility of building sound walls to reduce the impacts of traffic volume-related noise increases, impacts attributed to traffic noise would be significant and unavoidable.

Land Use Compatibility

General Plan Policy 7.2-1 states that the City shall prohibit the development of new noise-sensitive uses in areas where they may be exposed to noise levels that are 'normally unacceptable' or higher if alternative locations are available in the City. As detailed in Table 4.11-4, pursuant to the Noise Ordinance ambient levels of 70 dBA CNEL or higher would be considered 'normally unacceptable' for residential housing. As detailed in Figure 4.11-1, normally unacceptable levels of ambient noise exist or are projected to exist within the Belmont Village PDA area and along major thoroughfares in the City including Ralston Avenue. These projections do not take into account further increases in ambient noise caused by the increase in VMT that would be generated by development facilitated by the project (although, as discussed above, these VMT increases would only impact ambient noise levels in up to three TAZs). Therefore, much of the development facilitated by the project would take place in or near areas with normally unacceptable ambient noise levels. However, most of the relevant Draft Housing Opportunity Sites are located within the Belmont Village PDA and as such are exempt from noise standards under Policy 7.1-4. With regards to any remaining Draft Housing Opportunity Sites outside the PDA that may be exposed to normally unacceptable noise conditions if developed, it should be noted that the proposed Housing Element Update considers all the locations across the City deemed potentially viable for development under the project; were further alternative locations available, they would be included in the Draft Housing Opportunity Sites under consideration. Therefore, it can be reasonably determined that there are no alternative locations available for consideration and the restrictions of Policy 7.2-1 do not apply; thus, impacts related to land use compatibility would be less than significant.

Threshold:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?
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Impact NOI-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE RESIDENTIAL AND NOT ANTICIPATED TO INVOLVE OPERATIONAL ACTIVITIES THAT COULD RESULT IN SUBSTANTIAL VIBRATION OR GROUNDBORNE NOISE (SUCH AS USE OF HEAVY INDUSTRIAL EQUIPMENT). IF PILE DRIVING IS PERFORMED DURING CONSTRUCTION, VIBRATION FROM THIS EQUIPMENT MAY EXCEED APPLICABLE STANDARDS. THIS WOULD BE A POTENTIALLY SIGNIFICANT IMPACT.

Construction activities associated with development facilitated by the project would result in varying degrees of groundborne vibration depending on the equipment and methods employed. As depicted in Table 4.11-7 above, the greatest likely source of vibration during most construction activities at development facilitated by the project would be caused by use of large bulldozers, which would create approximately 0.089 in/sec PPV at the modeled distance of 25 feet (FTA 2018). As discussed under *Thresholds of Significance* above, the distinctly perceptible vibration level for humans is 0.25 in/sec PPV and the most conservative level for structures is 0.12 in/sec for structures with high historic value; the level is much higher for residential units at 0.2 in/sec, and at 0.4 in/sec for commercial uses. It is unlikely that development facilitated by the project would require more construction equipment than what was analyzed in the General Plan EIR such that vibration levels would exceed those that would be possible under currently possible development. Therefore, impacts associated with vibration from construction, including use of heavy bulldozers, would be less than significant.

While pile driving was considered unlikely for development analyzed by the General Plan EIR, development facilitated by the project may require pile driving activities due to the increase in allowable height to 65 feet. This would be most likely in the Belmont Village PDA area. The use of pile driving equipment is dictated by site soils and the need for secure or deep foundational pilings based on building height or design, and thus cannot be predicted with any reasonable certainty at a program-level analysis. Given typical setbacks and equipment size, a pile driver may be used within 25 feet of the nearest existing buildings. This analysis conservatively assumes the use of an impact pile driver, which would generate approximately 0.644 in/sec PPV at a distance of 25 feet (FTA 2018). This would exceed the distinctly perceptible impact for humans of 0.24 in/sec PPV, and the structural damage impact of between 0.12 and 0.4 in/sec PPV depending on the type of building impacted. Therefore, impacts from vibration would be significant and mitigation measures would be required.

As detailed in Section 4.4, *Cultural Resources*, and depicted on Figure 4.4-1 in that section, numerous Draft Housing Opportunity Sites are located near identified historic or cultural resources, including sites near or within historic districts. Table 4.4-2 in that section further identifies Draft Housing Opportunity Sites with identified buildings older than 45 years. These resources would all be susceptible to vibration impacts during construction activities that involved pile-driving. While General Plan Policy 7.1-10 requires developers to “implement mitigation for construction activities that generate excessive vibration,” the measures are not specified and excessive vibration is not defined. Therefore, Mitigation Measure NOI-1 would be required to ensure that an adequate analysis of potential vibration impacts is performed prior to the use of high-vibration equipment such as pile drivers, especially near historic structures or resources which pose the greatest risk of damage from groundborne vibration, and that alternatives are identified or all reasonable mitigation for the vibration created by such equipment during construction is implemented if alternatives are not available.

Development facilitated by the project would not involve substantial vibration sources associated with operation. The primary sources of operational vibration would be from related vehicular traffic and the operation of HVAC units; no heavy industrial equipment would be expected in residential developments. Neither HVAC units nor light-duty vehicle traffic generate significant vibration, and therefore, operational vibration impacts of development facilitated by the project would be less than significant.

Mitigation Measure

NOI-1 Vibration Control Plan

For projects involving pile drivers, vibratory rollers, or similar high-vibration equipment, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:

- Use of drilled piles or similar method (e.g., cast-in-place systems) rather than pile driving
- Use of resonance-free vibratory pile drivers
- Use of rubber-tired equipment rather than metal-tracked equipment
- Avoiding the use of vibrating equipment when allowed by best engineering practices

The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions of all buildings within a 50-foot radius as well as at potentially affected extremely fragile buildings/historical resources and/or residential structures within a 300-foot vicinity of the construction site. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting any existing cracks. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

A Statement of Compliance signed by the applicant and owner is required to be submitted to the City Building Department at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated and this person's contact information shall be posted in a location near the project site that it is clearly visible to the nearby receptors most likely to be disturbed. The Director would manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.

Significance After Mitigation

Impacts associated with vibration from pile driving or similar high-vibration activities would be reduced to the greatest extent feasible through implementation of Mitigation Measure NOI-1. However, due to the nature of pile driving activities, it may not be reasonably possible to reduce

vibration to less than significant levels even with mitigation implemented. Therefore, impacts related to vibration would remain significant and unavoidable.

Threshold:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
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Impact NOI-4 THERE ARE NO POTENTIAL SITES WITHIN THE NOISE CONTOURS FOR AN AIRSTRIP OR AIRPORT AS DEPICTED ON THE AIRPORT LAND USE PLAN, AND NO IMPACTS WOULD OCCUR FROM EXPOSING RESIDENTS OR WORKERS TO EXCESSIVE AIRCRAFT NOISE LEVELS.

As discussed under *Project Noise Setting*, above, none of the Draft Housing Opportunity Sites are located within the projected noise contours depicted in the San Carlos Airport land use plan. The San Carlos Airport is located near southwestern Belmont and the Belmont Village PDA, approximately 0.7 mile to the east from the nearest Draft Housing Opportunity Sites. There are no private airstrips in the project area. Based on the community noise exposure limits established in the General Plan and the noise exposure maps provided in the San Francisco Airport Noise Exposure Study (SFIA 2015), none of the Draft Housing Opportunity Sites would be exposed to airport noise greater than the allowable residential noise limits. Therefore, no substantial noise exposure from airport noise would occur to construction workers or residents of development facilitated by the project, and no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.11.4 Cumulative Impacts

Short-Term Cumulative Construction Phase Impacts

As discussed under Impact NOI-1 and NOI-3 above, noise and vibration associated with construction equipment could result in significant noise impacts. For construction activities, these impacts are typically considered localized impacts, affecting only receptors closest to construction activities. Therefore, unless construction of multiple developments facilitated by the project occur in close proximity to each other (i.e., less than 200 feet), and simultaneously, noise and vibration from individual construction projects may combine to create significant cumulative impacts. Development facilitated by the project may be distributed over many years and individual projects would all proceed through the approval process and phases of construction at different rates. It is unlikely that projects would occur around the same time and in proximity to each other anywhere other than the Belmont Village PDA, and projects within the PDA would be subject to Specific Plan Policy 6.5-3 requiring the most feasible construction noise mitigation. Therefore, multiple construction projects occurring in the same vicinity and time would not be expected to occur, and cumulative construction noise and vibration impacts would be less than significant.

Long-Term Cumulative Operational Noise Impacts

As discussed in Impact NOI-2, other than within the Belmont Village PDA, traffic noise increases from development facilitated by the project would be negligible and would not contribute to a noise level increase that exceeds impact criteria, and the traffic analysis includes future cumulative conditions. Even though traffic would gradually increase over the course of development facilitated by the project, the contribution would not be cumulatively considerable even at the maximum extent predicted. Within the PDA, Specific Plan Policy 6.5-1 further requires development to incorporate noise attenuation design features to reduce the interior noise levels to "normally acceptable levels" and this policy would apply to all development within the PDA that falls within the 65dB or higher noise contours.

As discussed in Impact NOI-2, the primary source of cumulative operational noise associated with development facilitated by the project would be HVAC units. Similar to construction noise and vibration, operational noise from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures and topography that block the line of sight, and due to other noise sources closer to receivers that obscure project-related noise. Within the Belmont Village PDA, operational noise would be exempt from exterior noise standards under Policy 7.4-1. Outside the PDA, the Draft Housing Opportunity Sites are not located in such close proximity to each other that operational noise would significantly impact the same sensitive receivers, and any proposed HVAC units would be required to incorporate siting or baffling considerations to comply with the exterior noise standards in Table 4.11-5. Therefore, the incremental effect of operational HVAC noise from development facilitated by the project would not be cumulatively considerable.

4.12 Population and Housing

This section analyzes impacts to population and housing growth associated with the implementation of the proposed project.

4.12.1 Setting

a. City of Belmont

Table 4.12-1 shows the 2021 estimates of population and housing units for the City of Belmont and San Mateo County. Belmont's current (2021) estimated population is 26,470 persons, a 0.7 percent decrease from its 2020 population of 26,669 (Department of Finance [DOF] 2021). The City's population constitutes approximately 3.4 percent of the countywide population of 771,061, and the City's 11,097 housing units constitute approximately 3.9 percent of the County's 280,859 total housing units. The average number of persons per household in the City in 2021 is estimated at 2.5, which is 12.9 percent lower than the countywide average of 2.87 persons per household in 2021.

Table 4.12-1 2021 Population, Households, and Housing Unit Estimates

	City of Belmont	San Mateo County
Population	26,470	771,061
Housing Units (Total)	11,097	280,859
Housing Units (Occupied) ¹	10,469	265,291
Persons/Household Ratio ²	2.5	2.87

¹ Estimated by applying a derived civilian vacancy rate to the estimated civilian housing units. Vacancy rates are based on 2010 Census benchmark data, adjusted to incorporate the directional changes described by the latest available American Community Survey (ACS) data.

²This is a ratio of persons (household) to an occupied housing unit.

Source: California DOF 2021

Table 4.12-2 shows the City and County employment, housing, and population estimates and forecasts from the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) Plan Bay Area 2040.¹ ABAG projections indicated an increase of 2,680 persons (9 percent) in the City's population over the next 20 years, for an estimated 2040 population of 30,085 residents. This forecasted growth represents approximately 134 new residents per year. Additionally, ABAG projections indicate an increase in the City's number of households by 710 (6 percent) over the next 25 years for an estimated 11,620 households in 2040. This forecasted growth represents 36 new households per year (ABAG 2017). There were 0.8 jobs per household in the City in 2020. This ratio is about 43 percent lower than the ABAG estimate of 1.4 jobs per household for San Mateo County in the same year. This suggests that Belmont is not a jobs rich community in which more residents commute to points outside the City for their jobs than workers commuting into the City. The City's lower ratio in comparison to the County is expected to continue in future years, based on ABAG forecasts.

¹ Although Plan Bay Area 2050 was completed and approved in October 2021, the data used in the analyses and projections were not broken down by individual jurisdiction. As a result, this environmental evaluation uses data supplied by the Plan Bay Area 2040 report.

Table 4.12-2 ABAG Population, Housing, and Employment Forecasts

	2020	2025	2030	2035	2040
City of Belmont					
Population	27,405	27,685	27,970	29,145	30,085
Housing Units	10,910	10,995	11,040	11,410	11,620
Employment (# Jobs)	9,240	9,300	9,425	9,430	9,430
Employment/Housing Ratio	0.8	0.8	0.9	0.8	0.8
San Mateo County					
Population	796,925	816,460	853,260	878,020	916,590
Housing Units	284,260	290,330	302,520	308,410	317,965
Employment (# Jobs)	399,275	415,305	423,005	436,205	472,045
Employment/Housing Ratio	1.4	1.4	1.4	1.4	1.5

Source: ABAG 2017

4.12.2 Regulatory Setting

a. State Regulations

Housing Element Law: California Government Code Section 65584(a)(1)

Pursuant to California Government Code Section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), ABAG being the COG serving the San Francisco Bay Area. HCD prepares an initial housing needs assessment and then coordinates with each COG to arrive at the final regional housing needs assessment. To date, there have been five previous housing element update "cycles." California is now in its sixth "housing-element update cycle." The ABAG RHNA and the City's General Plan Housing Element are discussed further below.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375)

Senate Bill (SB) 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill (AB) 32. SB 375 requires Metropolitan Planning Organizations (MPO) to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. As set forth in SB 375, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; (6) consider the state housing goals; (7) establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board (CARB), if there is a

feasible way to do so; and (8) comply with air quality requirements established under the Clean Air Act.

The City of Belmont is located in the jurisdiction of ABAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and State law, ABAG serves as a COG, a Regional Transportation Planning Agency, and the MPO for Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties and the towns and cities in those counties. ABAG is responsible for preparing the RTP/SCS and RHNA in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its subregions.

Existing law requires local governments to adopt a housing element as part of their general plan and update the housing element every four to eight years. SB 375 requires the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

On July 26, 2017, ABAG/MTC adopted Plan Bay Area 2040, a long range RTP/SCS for the nine-county San Francisco Bay Area. On October 21, 2021, ABAG/MTC adopted Plan Bay Area 2050, which supersedes the Plan Bay Area 2040 document. Using growth forecasts and economic trends, the RTP/SCS provides a vision for transportation throughout the region until 2040 that achieves the statewide reduction targets and in so doing identifies the amount and location of growth expected to occur within the region. Housing Crisis Act of 2019 – (SB 330 and SB 8)

The Housing Crisis Act of 2019 (SB 330) seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill was amended on September 16, 2021 (SB 8) to extend key provisions of SB 330 from January 1, 2025 to January 1, 2030. Significant amendments include expanding the definition of “hearing” and clarifying the definitions of “housing development projects” and “affordable housing project.” SB 8 also modifies how existing dwelling units that will be replaced with a new project through the Housing Crisis Act are protected and how tenants must be offered relocation or assistance. In addition, SB 8 clarifies the Housing Crisis Act requirement of “no net loss in residential capacity” (Kronick 2021).

Fair Employment and Housing Act (FEHA)

The FEHA of 1959 (Government Code Section 12900 et seq.) prohibits housing discrimination on the basis of race, color, religion, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.

The Unruh Civil Rights Act

The Unruh Civil Rights Act of 1959 (Civ. Code Section 51) prohibits discrimination in “all business establishments of every kind whatsoever.” The provision has been interpreted to include businesses and persons engaged in the sale or rental of housing accommodations.

AB 1763

AB 1763, effective January 1, 2020, amends the State Density Bonus Law (Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

Accessory Dwelling Units: California Government Code Section 65583(c)(7)

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of the state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65583(c)(7), the Housing Element must develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households.

Replacement Housing: California Government Code Section 65583.2(g)(3)

Pursuant to California Government Code Section 65583.2(g)(3), the Housing Element is required to include a program to impose housing replacement requirements on certain sites identified in the inventory of sites. Under these requirements, the replacement of units affordable to the same or lower income level, consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3)), would be required.

Relocation Assistance: California Government Code Section 7261(a)

Section 7261(a) of the California Government Code requires that programs or projects undertaken by a public entity must be planned in a manner that (1) recognizes, at an early stage in the planning of the programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of these problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion. The displacing agency must ensure the relocation assistance advisory services are made available to all persons displaced by the public entity. If the agency determines that any person occupying property immediately adjacent to the property where the displacing activity occurs is caused substantial economic injury as a result of the displacement, the agency may also make the advisory services available to that person.

b. Regional and Local Regulations

Regional Housing Needs Assessment (RHNA)

California's Housing Element law requires that each county and city develop local housing programs to meet their "fair share" of future housing growth needs for all income groups, as determined by the Housing and Community Development. The regional councils of government, including ABAG, are then tasked with distributing the State-projected housing growth need for their region among their city and county jurisdictions by income category. This fair share allocation is referred to as the RHNA process. The RHNA determines the minimum number of housing units each community is required to plan for through a combination of 1) zoning "adequate sites" at suitable densities to provide housing for all income levels; and 2) housing programs to support production of new housing units. As shown in Table 2-1, in Section 2, *Project Description*, Belmont's RHNA allocation is

1,785 units for the 2023-2031 planning period (6th RHNA cycle), distributed among four income categories. For the previous RHNA cycle, the City was allocated a total of 468 units to be accommodated in its Housing Element inventory of adequate sites.

ABAG Regional Transportation Plan/Sustainable Communities Strategy

ABAG/MTC is responsible for implementing Plan Bay Area 2040, the Regional Transportation Plan/Sustainable Communities Strategy (ABAG 2017). Plan Bay Area 2040 is a long-range integrated transportation and land-use plan for the San Francisco Bay Area through 2040. ABAG/MTC projections for the planning area consider regional, State, and national economic trends and planning policies. Plan Bay Area 2040 was recently updated and is now superseded by Plan Bay Area 2050, which was adopted on October 21, 2021.

c. Local Regulations

City of Belmont Housing Element

The Housing Element is one of the required elements of the Belmont General Plan that the City originally adopted in 1982; the current (5th) cycle of the Housing Element was adopted in January 2015 that covers the eight year period ending in January 2023,. The 6th cycle Housing Element (2023-2031) will additionally be revised for compliance with Division 1, Title 2, Chapter 15 of the Government Code, added by Assembly Bill (AB) 686 in September 2018, which requires housing elements to contain an Assessment of Fair Housing consistent with the State's efforts to Affirmatively Furthering Fair Housing. The purpose of the Housing Element is to identify and analyze existing and projected housing needs to preserve, improve, and develop housing for all economic segments of the community in a way that provides equitable access to resources.

4.12.3 Impact Analysis

a. Methodology and Thresholds of Significance

Population and housing trends in the county were evaluated by reviewing the most current data available from the DOF, and Plan Bay Area 2040². Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes are directly linked to a physical change.

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to population and housing are considered significant if implementation of the proposed project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

For purposes of this analysis, "substantial" population growth is defined as growth exceeding ABAG/MTC population forecasts for the City. "Substantial" displacement would occur if allowed land uses

² Although Plan Bay Area 2050 was adopted in October 2021, the growth projections do not include data at the city level. Therefore, this analysis relies on growth projections from Plan Bay Area 2040, which was adopted in July 2017.

would displace more residents than would be accommodated through growth provided by project implementation.

Threshold:	Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
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Impact POP-1 DEVELOPMENT FACILITATED BY THE PROJECT COULD ACCOMMODATE AN ADDITIONAL 8,250 NEW RESIDENTS AND 3,300 NEW HOUSING UNITS IN THE CITY. THIS WOULD EXCEED THE 2035 GENERAL PLAN PROJECTIONS AS WELL AS PLAN BAY AREA 2040 POPULATION AND HOUSING FORECASTS BUT WOULD BE CONSISTENT WITH THE CITY'S RHNA ALLOCATION. THE PROJECT WOULD INCLUDE AN UPDATE TO THE 2035 GENERAL PLAN TO BE CONSISTENT WITH THE RHNA ALLOCATION, AND ABAG'S NEXT RTP/SCS WOULD INCORPORATE THE PROJECT'S UPDATES. GROWTH RESULTING FROM THE PROJECT WOULD THEREFORE BE ANTICIPATED AND WOULD NOT RESULT IN UNPLANNED POPULATION GROWTH. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

For purposes of this analysis, "substantial" unplanned population growth is defined as substantial growth exceeding that forecast in existing local and regional plans, including the 2023-2031 RHNA, the 2035 General Plan, and the Plan Bay Area 2040.

The project would include rezoning 47 Draft Housing Opportunity Sites from SC to CMU and VSC zones. Furthermore, the project would include increasing the maximum allowable FAR and eliminating the density maximum metric in CMU zones as well as increasing height in both CMU and VSC zones to allow structures up to 65 feet, in order to encourage housing production to meet the City's RHNA allocation for the 2023-2031 planning period. As noted in Section 2.0, *Project Description*, the development potential encouraged by the project would be 3,300 residential units and 8,250 new residents.

Furthermore, development facilitated by the project and the rezoning of 47 Draft Housing Opportunity Sites would be able to more efficiently utilize underdeveloped, underutilized, or vacant lots, as well as four sites out of City limits (sites 80, 83, 136, and 137) which are proposed for annexation to the City before January 2023. The sites would be mostly located within the El Camino Real/Old County Road corridors and Belmont Village Specific Plan (BVSP) area, which would be near existing residential uses, transit corridors, job centers, neighborhood services, and amenities. These land use changes would be made to accommodate the densities appropriate for the 6th Cycle RHNA allocation.

According to the DOF, the City currently has 11,140 housing units. Based on 2.5 persons per household, the current population is estimated at 26,470 residents (DOF 2021). The project would result in housing capacity for an additional 3,300 additional housing units, which would add an estimated of 8,250 additional persons.³ Since most development would occur within the BVSP area, employment associated with the project would be accommodated and would not result in substantial population growth.

Comparison to the 2035 General Plan

The 2035 General Plan anticipated facilitating a maximum buildout development for an estimated additional 4,100 residents, 1,500 households, and approximately 3,300 jobs (City of Belmont 2017). Therefore, the 2031 population forecast for the City would exceed the 2035 General Plan forecast

³ Calculation: 3,300 housing units times 2.5 persons per household equals 8,250 people.

by 4,150 residents.⁴ The 2031 housing unit forecast for the City would also exceed the 2035 General Plan forecast by 1,843 units. Table 4.12-3 shows the difference between the forecasts for the 2035 General Plan and project. The project would encourage development of residential units that would be 14.6 percent above the 2035 General Plan forecast, resulting in a City population that would be 13.6 percent above the 2035 General Plan forecast. However, as described in Section 2, *Project Description*, due to the current zoning of the Draft Housing Opportunity Sites, the Draft Housing Opportunity Sites would be able to be developed with housing even without project implementation.

Table 4.12-3 Comparison of 2035 General Plan and Project Projections

	Existing Conditions (2021)	Project Growth Accommodation	2031 Conditions Under the Project	2035 General Plan Projections	Difference	Percent Difference Over 2035 General Plan
Housing Units	11,140	3,300	14,440	12,597	+1,843	14.6
Population	26,470 ¹	8,250	34,720	30,570	+4,150	13.6

¹ Population for unincorporated areas was estimated using an average household size of 2.5 persons per household.

Sources: DOF 2021, City of Belmont 2017

Comparison to Plan Bay Area 2040⁵

Plan Bay Area 2040 provides development projections until 2040, so the projected 2031 population and housing numbers were interpolated from the 2040 projections using the average percent growth per year for the City. Plan Bay Area forecasts the City's population to grow from 27,405 in 2020 to 30,085 by 2040, 9.8 percent total growth.⁶ ABAG forecasts an average annual growth rate of the City's population to be approximately 0.5 percent.⁷

Plan Bay Area 2040 forecasts the City's housing stock to grow from 10,910 in 2020 to 11,620 in 2040, approximately 6.5 percent total growth.⁸ ABAG forecasts an average annual growth rate of the City's housing units of approximately 0.3 percent.⁹

The annual growth rate percentages were used to determine the 2031 population and housing stock forecasts. Applying the Plan Bay Area 2040 forecast population growth rate, the City's population would increase by approximately 1,297 residents by 2031 for a forecasted population of 27,767.¹⁰ Similarly, applying the Plan Bay Area 2040 forecast housing unit growth rate, the City's housing stock would increase by approximately 360 units by 2031 for a forecasted housing stock of 11,270 units.¹¹

⁴ Calculation: 8,250 projected residents for 2031 minus 4,100 projected residents under the 2035 General Plan buildout equals 4,150 additional residents.

⁵ Although Plan Bay Area 2050 was adopted in October 2021, the growth projections do not include data at the city level. Therefore, this analysis relies on growth projections from Plan Bay Area 2040, which was adopted in July 2017.

⁶ Calculation: 2,680 residents divided by 27,405 residents equals 9.8 percent total growth.

⁷ Calculation: 9.8 percent divided by 20 years equals approximately 0.5 percent.

⁸ Calculation: 710 residential units divided by 10,910 units equals 6.5 percent.

⁹ Calculation: 6.5 percent divided by 20 years equals approximately 0.3 percent.

¹⁰ Calculation: 0.005 times 26,470 residents times 10 years equals 1,297 residents.

¹¹ Calculation: 0.003 times 10,910 units times 10 years equals 11,270 units.

Table 4.12-4 shows the difference between growth forecasts for 2035 General Plan and the project. The population growth under the project would exceed ABAG's population growth forecast by approximately 25.0 percent and the housing growth forecast by 28.1 percent.

Table 4.12-4 Comparison of Plan Bay Area 2040 Forecast and Project Projections

	Existing Conditions (2021)	Project Growth Accommodation	2031 Conditions Under the Project	ABAG 2031 Forecast	Difference	Percent Difference Over ABAG 2031 Forecast
Housing Units	11,140	3,300	14,440	11,270 ²	+3,170	28.1
Population	26,470 ¹	8,250	34,720	27,767 ³	+6,953	25.0

¹ Population for unincorporated areas was estimated using an average household size of 2.5 persons per household.

² Housing forecast was estimated using the Plan Bay Area 2040 forecast growth rate for the City of 0.33 percent increase per year for ten years.

³ Population forecast was estimated using the Plan Bay Area 2040 forecast growth rate for the City of 0.49 percent increase per year for ten years.

Sources: DOF 2021, ABAG/MTC 2017

Conclusion

The project would be consistent with State requirements for the RHNA. Although the project would facilitate development beyond what is forecasted in both the City's 2035 General Plan and ABAG's Plan Bay Area 2040, it would bring the forecasts for the General Plan and Plan Bay Area 2040 into consistency since Plan Bay Area 2040 would be updated to reflect new forecasts for each city in the region.

The State requires that all local governments adequately plan to meet the housing needs of their communities (HCD 2021). Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units under the project would further assist in addressing the existing crisis and in meeting the housing needs of the City's residents. Furthermore, the project would first be submitted to the HCD for review and approval to ensure that it would adequately address the housing needs and demands of the City. Approval by HCD would ensure that population and housing growth under the project would not be substantial or unplanned.

The increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed in the City that meet these household income categories, which would in turn reduce vehicle miles traveled (VMT) and associated impacts related to transportation, air quality, and GHG emissions. Additionally, as shown in Appendix SITE, the Draft Housing Opportunity Sites would concentrate housing development in the Belmont Village Specific Plan Area near jobs and amenities.

Development facilitated by the project is intended to be dispersed throughout the community to create managed and planned levels of growth in specific areas. As discussed in Section 4.14, *Utilities and Service Systems*, the City is mostly developed and is supported by existing infrastructure which is sufficient to serve the additional housing units. The project would not create or require the construction of new roads or major infrastructure, or directly or indirectly induce unplanned population growth. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
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Impact POP-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD OCCUR ON VACANT, UNDERUTILIZED OR UNDERDEVELOPED LOTS, AND WOULD NOT DISPLACE SUBSTANTIAL NUMBERS OF EXISTING PEOPLE OR HOUSING. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Substantial displacement would occur if allowed land uses displace more residences than would be accommodated through growth facilitated by the project. The project would accommodate new development and redevelopment projects in the City through rezoning to facilitate development with higher floor area ratios, height, and densities than previously allowed on those sites. Under the project, an estimated of 3,300 new housing units could be developed by 2031.

Focusing development in the Belmont Village Specific Plan Area would not result in the displacement of a substantial number of existing residences in order to accommodate for the planned increase in development intensity since most Draft Housing Opportunity Sites would be located on underdeveloped, underutilized, or vacant lots. Furthermore, the City's 2015-2023 General Plan contains an Anti-Displacement Policy under Program 1.5 to ensure impacts associated with displacement of people and/or housing would be reduced to a less than significant level, and Government Code Section 65583.2(g)(3) requires housing element to include a program requiring replacement of units affordable to the same or lower income level as a condition of development on a nonvacant site. In addition, the City has adopted a Live/Work policy that offers priority to affordable housing units who live or work in the City. Furthermore, although no projects have been identified that would displace existing units, if displacement did occur, new residential units would be constructed to more than replace existing displaced residences pursuant to the Housing Crisis Act, as referenced in Section 4.12.2 *Regulatory Setting*. Therefore, impacts related to displacement of existing residences would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.12.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative population and housing impacts is the City of Belmont. This geographic scope is appropriate for population and housing because projections at this level are used to estimate the need for public services and other government facilities and programs. Cumulative development includes development associated with buildout of the City's General Plan and adjacent incorporated City general plans, as well as foreseeable future

projects that could have a direct connection to the proposed project from a population and housing perspective.

As discussed under Impact POP-1, while the housing unit estimates would exceed the City's General Plan buildout estimates, the City has identified an ongoing housing need due to a lack of vacant land as well as a strong demand for more affordable housing. Furthermore, State laws require local governments to regularly assess and plan for future growth. The City for example is required to update its Housing Element and correspondingly plan to accommodate the RHNA allocation every eight years. In turn, individual development projects that exceed zoning code and land use designation requirements would be assessed for consistency with ABAG projections through the environmental review process. Therefore, it is not anticipated that future cumulative development would induce population growth exceeding projections incorporated into the project's planning efforts. In addition, the project already incorporates regional growth anticipated by ABAG's RHNA projections and thus considers cumulative growth.

As discussed under Impact POP-2, the proposed project would accommodate the City's forecasted population and housing demand through 2031. The project would result in an overall net increase of housing units in the City, including affordable housing, and would not result in the displacement of people or housing. Other project-level developments would be subject to CEQA, including consideration of whether the projects would displace people or residences. With these considerations prior to project approval, cumulative impacts related to the displacement of people or residences would be less than significant, and the proposed project would not significantly contribute to cumulative impacts.

4.13 Public Services and Recreation

This section analyzes impacts related to the provision of facilities for public services, including fire protection services, police protection services, schools, parks, recreational facilities, and library facilities, associated with the implementation of the proposed project.

4.13.1 Setting

a. Fire Protection

The Belmont Fire Protection District (BFPD) provides fire protection services in the City of Belmont. As of 2017, the BFPD employed 24 personnel servicing a population of approximately 27,000 which encompasses 4.6 square miles within the City of Belmont and 60 acres in the unincorporated Harbor Industrial Area (HIA) of San Mateo County (County of San Mateo 2016). The BFPD provides services of fire prevention and suppression, emergency medical services and wild land response (San Mateo Local Agency Formation Commission [LAFCO] 2021). The BFPD also provides a county-wide hazardous materials response team through a contract with the County of San Mateo and is part of a shared management services agreement through the establishment of a Joint Powers Authority (JPA) with the Cities of San Mateo and Foster City (City of Belmont 2017a). The JPA, also known as San Mateo Consolidated Fire Department (SMCFD), provides automatic aid response through nine fire stations located throughout the cities of Belmont, Foster City and San Mateo (San Mateo Consolidated Fire Department 2021).

The BFPD operates two fire stations (Stations 14 and 15) as well as a Fire Administration office. As part of the countywide fire service deployment plan, the City and other jurisdictions also utilize 58 engine companies and seven truck companies. Table 4.13-1 provides a breakdown of the staffing and equipment of each station as of 2017 and Figure 4.13-1 shows the location of Stations 14 and 15.

Table 4.13-1 Belmont Fire Protection District Staffing by Divisions

Stations	Staffing	Fire Engines	Other Key Equipment
Station 14	3 firefighters ¹ per 24-hour shift	1 front line 1 reserve	1 U-14 (Utility Vehicles) 1 Hazmat Van
Station 15	3 firefighters ¹ per 24-hour shift	1 front line 1 reserve	
San Mateo Fire Station 23 ²	3 firefighters (one per shift) 1 Fire Captain	N/A	N/A
Fire Building Administration Building	1 Administrative Battalion Chief 1 Management Analyst	None	1 Staff Car 1 B-4 (Command Vehicles)

¹ Includes at least one firefighter/paramedic and one fire captain

² One firefighter from each shift and one fire captain from one shift staff part of San Mateo Fire Truck 23 along with Foster City Fire personnel as part of the three cities' Shared Truck Agreement

Source: City of Belmont 2017b

Figure 4.13-1 Public Safety Facilities



Source: City of Belmont, 2014.

The BFPD is one of the designated Paramedic First Response Service Providers of the San Mateo County Pre-Hospital Emergency Medical Services Group. All engines of the BFPD are required to maintain a 24/7 advanced life support (ALS) capability and have a countywide response time standard of six minutes and 59 seconds for medical emergencies. Furthermore, the BFPD is “first due” to the unincorporated HIA and portions of the Cities of San Mateo and San Carlos because of their proximity to BFPD’s facilities. The District has an Insurance Service Office (ISO) rating of three, on the scale of one to ten, with one being exemplary fire protection.

b. Police Protection

The Belmont Police Department (BPD) is a full-service police agency and provides protection services within the City limits. As of 2017, BPD had 43 sworn officers and a service ratio of 1.62 sworn officers per 1,000 residents, as shown on Table 4.13-2. In addition to the 43 full time staff, the Department also receives support from Reserve Police Officers, Police Explorers, and Citizen Volunteers. The BPD operates nine divisions, including: patrol, traffic, K9, investigations and youth services, dispatch, records, code enforcement, Special Weapons and Tactics (SWAT) and Crisis Negotiation Unit (CNU), and a volunteer program. The BPD is part of San Mateo County Sheriff’s SWAT team and CNU by providing both SWAT Operators and Crisis Negotiators (City of Belmont 2017b). Table 4.13-2 provides a breakdown of staffing by division as of 2017 and Figure 4.13-1 shows the location of the Belmont Police Department.

Table 4.13-2 Belmont Police Protection Staffing by Divisions

Divisions	Number of Employees
Administration	5
Operations Division	
Patrol	19
Traffic	2
Community Service	3
Code Enforcement	1
Support Services Division	
Records	3
Communications	5
Investigations	3
Youth Services/School Resources	2
Total	43

Source: City of Belmont 2017b

c. Schools

The City is within the jurisdiction of the Belmont-Redwood Shores School District (BRSSD), which provides public education from kindergarten through eighth grade to residents in Belmont and the neighboring community of Redwood Shores. 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 residents within and outside of Belmont (City of Belmont 2017c).

BRSSD is served by four elementary schools, two K-8 school, one middle school and one high school. Table 4.13-3 lists 2019-2020 enrollment for all schools in relevant districts and 2016-2017 enrollment capacity numbers from the General Plan 2017 Draft Environmental Impact Report.

Table 4.13-3 BRSSD and Carlmont High School Student Enrollment and Capacity for 2019-2020

School Name	2019-2020 Enrollment	Enrollment Capacity	Remaining Capacity
Elementary Schools (K-5)			
Central Elementary	444	450	6
Cipriani Elementary	461	400	-61
Fox Elementary	502	505	3
Nesbit Elementary (K-5 only)	552	548	-4
Redwood Shores Elementary	461	540	79
Sandpiper School (K-5 only)	481	530	49
Total	2,901	2,973	72
Middle Schools (6-8)			
Ralston Middle School	1,100	1,214	114
Nesbit Elementary (6-8 only)	130	120	-10
Sandpiper School (6-8 only)	162	180 ¹	18
Total	1,392	1,514	122
High School (9-12)			
Carlmont High School	2,256	2,200	-56
Total Enrollment	6,549	6,687	138

¹ Sandpiper Middle School was added from 2017-2019 and therefore does not have 2016-2017 enrollment capacity numbers (BRSSD n.d.). Sandpiper Middle School has 2 classes per grade and 30 students per class, resulting in an enrollment capacity of 180 (2 classes per grade x 3 grades x 30 students).

Source: National Center for Education Statistics (NCES) 2021, City of Belmont 2017a

To accommodate more students, the BRSSD has taken several steps to ensure quality facilities and to increase enrollment capacity. The Facilities Assessment & Master Plan created in 2010 serves to improve the conditions of the BRSSD's facilities through recommendations to increase safety and sustainability, improve infrastructure (drainage, roofing, plumbing, and electricity), modernize buildings, and meet the Americans with Disabilities Act (ADA) requirements (City of Belmont 2017a). Cipriani Elementary School and Sandpiper School completed expansion projects in 2017, which helped relieve pressure on Ralston Middle School. Cipriani Elementary School constructed a new 2-story classroom building to provide a fully functional facility for 75 students per grade level (450 total); Sandpiper School expanded from a K-5 elementary school to a school that will serve Transitional Kindergarten through eighth grade and constructed additional classrooms to provide for 100 students in each Grade K-5 (BRSSD n.d.). Similarly, SUHSD completed the construction of a 10-classroom building for Carlmont High School in 2017 to serve an additional 917 students (BHM Construction 2017). When enrollment at the BRSSD's schools approaches total capacity, some students will be assigned to schools that are slightly farther from their homes (BRSSD 2021).

d. Libraries

The Belmont Library is one of 13 branches of the San Mateo County Library (SMCL) System. The Belmont Library is a 20,230 square foot space that contains approximately 70,000 materials in its collection. The library however requires several improvements to meet local needs. The library includes a parking lot with 52 parking spaces, which is insufficient and chronically overfilled. There are also 17 public and private schools within a 5-mile radius which create pressure on the library's child-friendly spaces to accommodate students (City of Belmont 2017a). To strengthen its educational program and modernize its facility, the Belmont Library offers Big Lift Inspiring Summer (BLIS) camps that includes a morning literacy program and an afternoon STEAM enrichment program (SMCL 2021). In addition, the library's leadership supports the potential to remodel the Barrett Community Center, a converted elementary school acquired by the City that holds a mix of recreation programs for residents of all ages, as a youth-friendly space and to create a complementary relationship between the two establishments (City of Belmont 2017a).

e. Parks

Park Classifications

Parks and open space within the City of Belmont accounts for 12.5 percent, or around 377 acres, of land (City of Belmont 2017c). The City provides five different types of parks and recreation facilities to its residents. In addition, there is joint use planning and operation of school district athletic facilities for public recreation. Parks and recreational facilities are classified as follows:

- **Mini Park.** A small park ranging from a quarter-acre to two acres that is located within a residential area and is intended to provide play areas for small children or passive sitting areas for residents within a quarter-mile radius.
- **Neighborhood Park.** A medium-sized park ranging from two to 10 acres that provides basic recreational activities for a specific neighborhood within a one-mile radius.
- **Community Park.** A large park ranging from 20 to 50 acres that includes passive and active recreation facilities that serve the entire city or a substantial portion of the city.
- **School Park.** Athletic fields and facilities that operate under joint use agreements between the City and the School District and are used by the community during non-school hours.
- **Special Facility.** A facility such as a community center, athletic complex, aquatic center or other cultural or athletic facility that services a specific recreational need for all or a portion of the city's population (City of Belmont 2017d).

Existing Parks and Recreation Facilities

The City currently manages the maintenance and improvement of 14 developed parks, two undeveloped parks, 11 athletic fields, nearly 320 acres of open space, and over 160,000 square feet of public buildings. Figure 4.13-2 shows the existing parks and recreation facilities in the City, as well as planned improvements and open space lots that have been donated to the City but have not been improved as parks. Table 4.13-4 provides a list of parks, recreational areas and open space within the City as of 2017 and the approximate acreage for each. In general, mini parks have a service area of about one-quarter-mile radius, neighborhood parks have a service area of about one-mile radius, and community parks serve the entire City. The City has a Joint Use Agreement with BRSSD for year-round use of athletic fields for Fox, Ralston, Central and Nesbit Schools (City of

Belmont 2017d). The Joint Use Agreement was renewed in 2019 another 10 years (City of Belmont 2020a).

Table 4.13-4 Parks, Recreation Facilities, and Open Space Inventory

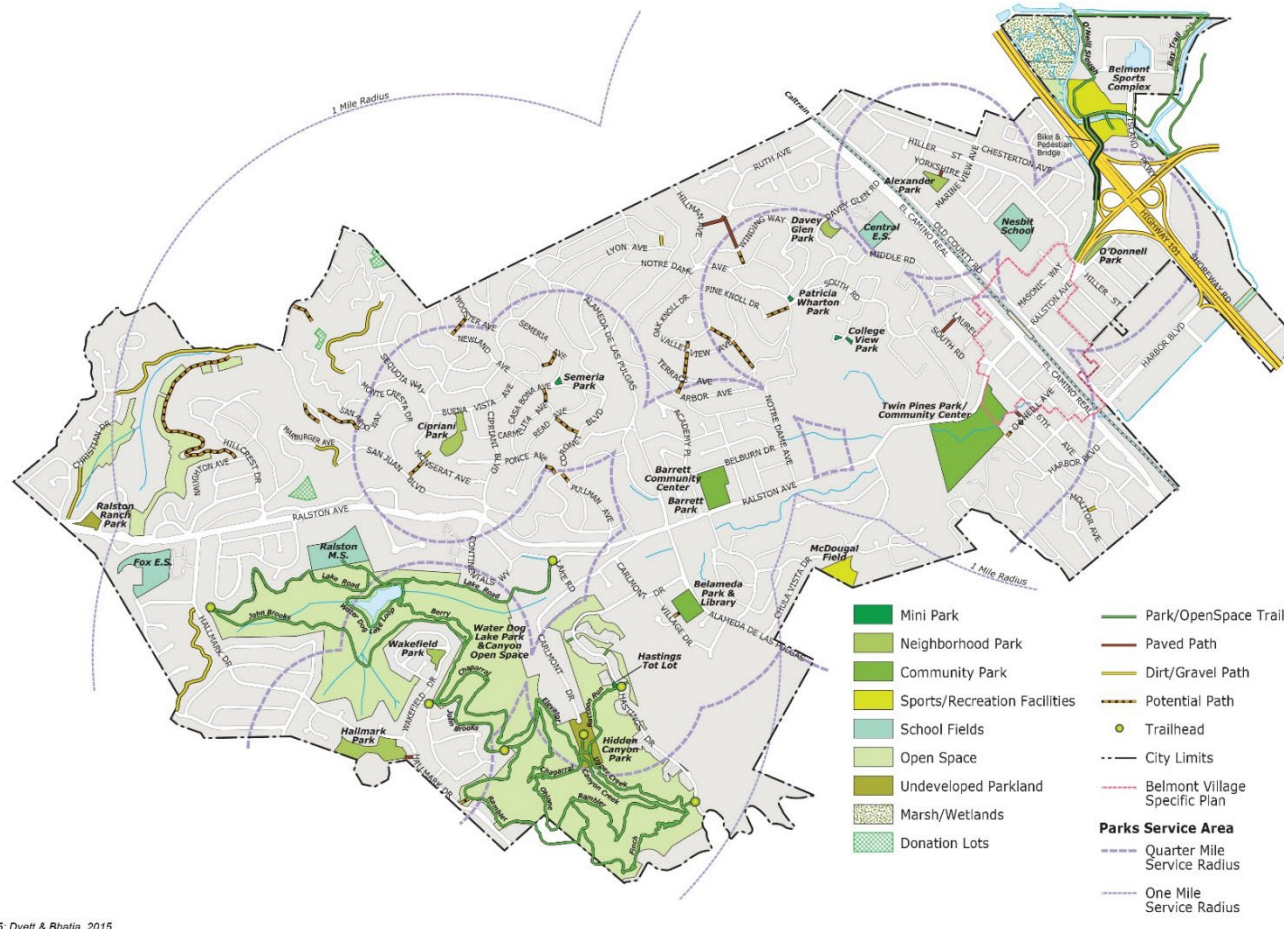
Park or Recreational Facility	Acreage ¹
Neighborhood and Mini Parks	
Alexander Park	1.4
Cipriani Park and Dog Park	10.0
College View Park	0.1
Davey Glen Park	1.1
Hallmark Park	5.2
Hastings Tot Lot	0.3
O'Donnell Park	0.9
Patricia Wharton Park	0.1
Semeria Park	0.2
Wakefield Park	1.1
<i>Subtotal Neighborhood and Mini Parks</i>	20.4
Community Parks	
Barrett Community Center and Park	5.0
Belameda Park	2.9
Belmont Sports Complex	12.6
McDougal Field	3.0
Twin Pines Park ²	19.9
<i>Subtotal Community Parks</i>	43.4
Undeveloped Park Areas	
Ralston Ranch Park	1.3
Hidden Canyon Park	23.7
<i>Subtotal Undeveloped Parks</i>	25.0
School Parks (under Joint Use Agreements)	
Central School	3.4
Fox School	6.1
Nesbit School	6.5
Ralston Middle School	7.4
<i>Subtotal School Parks</i>	23.4
Total Parks and Recreation Facilities	112.2
Open Space and Trail Areas	
San Juan Canyon	33.0
Water Dog Lake	260.6
<i>Subtotal Open Space and Trail Areas</i>	293.6
Total Parks, Recreation Facilities and Open Spaces	405.8

¹ Acreage is rounded to the nearest tenth acre. Numbers may not sum precisely due to rounding.

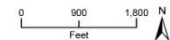
² Includes other community facilities as well: the Manor House, the Cottage, Twin Pines Senior & Community Center, and the Lodge

Source: City of Belmont 2017d

Figure 4.13-2 Existing Parks and Recreation Facilities



Source: City of Belmont, 2015; Dyett & Bhatia, 2015.



The Parks and Recreation Department offers recreation programs for Belmont residents, and uses the Twin Pines Senior and Community Center, the Barrett Community Center, and the Belmont Sports Complex as program locations.

Existing Parks and Recreation Facilities and Programming in the Belmont Village Specific Plan (BVSP) Area

While Belmont has many parks and open space resources, many of them are located outside of the Village. The BVSP Area includes the eastern portion of Twin Pines Park, which is located to the west of City Hall in the southwest quadrant. The 19-acre park extends to the west of the BVSP Area. Belmont Creek runs through the park, forming the southern boundary of the BVSP Area. A priority of the BVSP is to physically and visually connect the Village Core with the creek and park through wayfinding, consistent landscaping, and circulation improvements at the Twin Pines Lane entrance (City of Belmont 2017a).

Several of the city's parks and recreation facilities are accessible by foot, bike, or a short drive from the BVSP Area. O'Donnell Park and Alexander Park are a short distance from the Village in eastern Belmont, providing additional park facilities for BVSP Area residents and employees. College View Park and Davey Glen Park are in the neighborhoods to the northwest of the Village. Belmont Sports Complex is about 0.5-mile east of the BVSP Area boundary, but it is located across Highway 101 and accessible on foot via the Children's Bridge. The City also has a joint use agreement for use of school recreation facilities outside of school hours with Nesbit and Central Elementary Schools, which are located within a short distance of the BVSP Area (City of Belmont 2017a).

Planned Improvements to Parks and Recreation Facilities in BVSP Area

Over the planning horizon of the BVSP, about 1,100 new residents are anticipated in addition to the BVSP Area's existing 670 residents, to bring the total population to about 1,780. Based on the standard of 5.0 acres of parkland per 1,000 residents, an additional 5.6 acres of public parkland are needed to meet the parks and recreation needs of the new population in the BVSP Area. 40 percent, or about 2.2 acres, of the additional public parkland should consist of smaller neighborhood parks, located throughout the Village as feasible, to meet the everyday park needs of residents in the BVSP Area. The remainder of the parks acreage that is needed for the new population (60 percent or 3.4 acres) can be met by the existing community park in the BVSP Area, Twin Pines Park (City of Belmont 2017a).

The BVSP seeks to supplement public parks and open spaces with privately owned public open spaces and common open spaces—such as plazas, courtyards, roof decks, and terraces—in nonresidential and residential development projects. The BVSP includes standards for public and private open spaces in new development, based on land use designation. For parcels larger than 12,000 square feet, a minimum of 300 square feet of public open space area is required for development in the Village Core and Station Core designations, and 200 square feet of public open space area is required for development in the Village Corridor Mixed Use designation (City of Belmont 2017a).

4.13.2 Regulatory Setting

a. State Regulations

Fire Services

California Fire Code (Title 24, Part 9, California Code of Regulations)

The California Fire Code incorporates the Uniform Fire Code (UFC) with necessary California amendments. This Code prescribes regulations consistent with nationally recognized good practices for the safeguarding, to a reasonable degree, of life and property from the hazards of fire explosion. It also addresses dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; conditions hazardous to life or property in the use or occupancy of buildings or premises; and provisions to assist emergency response personnel.

California Building Code

The 2019 California Building Code (CBC) became effective January 1, 2017, including Part 9 of Title 24, the California Fire Code. Section 701A.3.2 of the CBC requires that new buildings located in any Fire Hazard Severity Zone in State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted, comply with all sections of the Chapter.

California Health and Safety Code (Sections 13000 et seq.)

This Code establishes State fire regulations, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Police Services

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35 at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

School Services

California Government Code Section 65995 (California Government Code, Title 7, Chapter 4.9)

California Government Code Section 65995 authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. Section 65995 was established under the School Facilities Act of 1986 and refined and amended by the Leroy F. Greene School Facilities Act of 1998 (SB 50) to provide further guidance and restrictions on fee limits and fee types. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The payment of school impact fees by developers are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws. BUSD determines fees annually in accordance with California Government Code Section 65995.

Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less-than-significant level.

b. Local Regulations

Belmont Fire Code

The Belmont Fire Code was subsequently adopted in 2016 after the State's adoption of the 2016 California Fire Code (CFC). The Belmont Fire Code incorporates the 2016 CFC as well as Local Amendments proposed by BFPD. Local Amendments include way-finding and street access improvement, restricted use of fireworks, and requirements for sprinkler installations (City of Belmont 2017b).

Belmont Municipal Code (BMC) Chapter 17

The City imposes Development Impact Fees (BMC Chapter 17 Article III) in order to mitigate environmental impacts that derive from projects. The fees would be imposed based on specified capital improvement categories, including fees for transportation improvements, park land and facilities, affordable housing, and other capital improvements.

The City also adopted a Park Impact Fee (BMC Chapter 17 Article IV) for residential and nonresidential development in October 2014, ensuring that all new growth in Belmont (not just

developments to which the Quimby Act applies) contribute to the City's park and recreation resources commensurate with their impact (City of Belmont 2017d).

City of Belmont Parks, Recreation and Open Space Master Plan

The City of Belmont Parks, Recreation and Open Space Master Plan is a strategic document that analyzes the park system, facilities and recreation programming within the City and provides long-term vision for the park system through policies and standards (City of Belmont 2021).

City of Belmont 2035 General Plan

The City of Belmont 2035 General Plan contains six elements for long-range development of the City and provides direction for future growth. The Safety Element's main objective is to introduce safety considerations into the planning process to reduce the potential for life, injuries, damage to property, or economic and social dislocation resulting from fires, geologic hazards, or seismic hazards. The Land Use Element and the Parks, Recreation, and Open Space Element's main objectives is to ensure land use planning reflects the community's evolution and changing demographics, and to conserve and maintain facilities to accommodate for future population growth and needs.

The following policies and actions within the General Plan's Safety Element, Land Use Element and Parks, Recreation, and Open Space Element relating to fire protection, police protection, parks, recreation, and open space and conservation are applicable to the proposed project (City of Belmont 2017b, 2017c, 2017d):

Fire Protection

Policy 6.6-1: Support efforts by the Belmont Fire Protection District to meet its response time standards throughout Belmont, especially in areas in the Wildland Urban Interface.

Policy 6.6-4: Continue the Belmont Fire Protection District's participation in plan review of new buildings in potentially fire prone areas.

Policy 6.6-5: Continue to require a fire prevention inspection of all buildings used as commercial businesses, places of assembly, multi-family residences, and hotels within the Belmont Fire Protection District's boundaries.

Policy 6.6-7: Continue to participate in State and regional efforts to develop a clear legislative and regulatory framework to manage the Wildland Urban Interface.

Policy 6.6-9: Continue to require development located within the VHFHSZ to maintain 100 feet of defensible space consistent with California Government Code section 51182.

Policy 6.6-10: Continue to require development located within the Wildland Urban Interface (WUI) to follow the code requirements in Chapter 7A of the California Building Code, and require buildings to be constructed of ignition-resistant materials and methods.

Policy 6.8-2: Continue to respond without delay to all calls for fire and emergency medical assistance as soon as possible consistent with normal safety precautions and vehicle laws. Periodically review procedures and response times to ensure equitable service across the district.

Police Protection

Policy 6.8-1: Continue to respond without delay to all calls for police assistance as soon as possible consistent with normal safety precautions and vehicle laws. Establish and periodically review procedures and response times to ensure equitable service across the community.

Action 6.8-1a: Establish and strive to achieve response time and service ratio standards for the Police Department.

Policy 6.8-3: Periodically evaluate police and fire services to ensure that the City is providing adequate protection in an efficient, cost-effective manner.

Policy 6.8-4: Continue to partner with schools and youth organizations to conduct outreach and develop conflict resolution, and form proactive and creative community partnerships to enhance public safety.

School and Public Services

Policy 2.10-2: Support continued improvements to the Belmont Library, including sustainability and “green” building enhancements, to meet the diverse needs of the Belmont community, including children, teens, and seniors.

Policy 2.10-3: Continue to coordinate and collaborate with the public school districts that serve the Belmont community on school facilities and planning land use, and circulation issues to support high quality educational opportunities in Belmont, including access to schools, facility expansion and modernization, and strategies to address school enrollment and space needs or constraints, in order to ensure that school facilities will be adequate to accommodate student growth.

Policy 2.11-1: Support increased collaboration and partnership with Notre Dame de Namur University on key issues such as master planning, land use, enrollment, economic development, circulation, housing, and open space.

Parks, Recreation, and Open Space

Policy 4.1-1: Support increased collaboration and partnership with Notre Dame de Namur University on key issues such as master planning, land use, enrollment, economic development, circulation, housing, and open space.

Action 4.1-1a: Update the Parks, Recreation, and Open Space Master Plan at least once every 10-15 years to ensure that it accurately reflects the community’s priorities and available resources. The update should include:

- Assessment of the parks and recreation needs of existing and future residents.
- In addition to a citywide evaluation of the parkland standards, evaluation of parkland standards on a neighborhood level to determine which neighborhoods are currently underserved.
- Appropriate uses of parks and recreational facilities based on a needs assessment.
- Opportunities and priorities for expanding and enhancing the park system and recreational facilities, especially in underserved areas that would benefit from additional mini or neighborhood parks.
- Determine the use or designation for the open space behind Carlmont High School. Detailed recommendations for specific parks, facilities, and neighborhoods, including

identification of potential opportunities for scientific, artistic, and historic exploration and discovery within Belmont's parks and recreational facilities.

- Financing strategies and funding priorities for parks and recreation facilities.

Policy 4.1-2: Strive to achieve and maintain a citywide standard of at least 5.0 acres of mini, neighborhood, and community parks per 1,000 residents, targeting a breakdown of 3.0 acres/1,000 residents for community parks and 2.0 acres/1,000 residents for neighborhood parks.

Action 4.1-2a: Establish priorities for use of park impact fees and in-lieu fees to achieve and maintain the citywide parkland standard, based on needs and priorities identified in the updated Parks and Open Space Master Plan.

Action 4.1-2b: Support acquisition or development of parks in Belmont, especially in neighborhoods that are currently underserved, to meet the City's parkland standard.

Action 4.1-2c: Pursue opportunities to convert underutilized parcels into mini parks or community spaces as is feasible, prioritizing those in areas that are currently underserved.

Action 4.1-2d: Develop a pilot program for "parklets" or "pop-up parks" to create small but functional public open spaces in street parking spaces or other underutilized places in the public right of way.

Action 4.1-2e: Encourage the installation of recreation areas and privately-owned public spaces in new developments and redevelopments including areas for off-leash dog running, events, and exercise.

Action 4.1-2f: Consider park uses for Hidden Canyon Park and Ralston Ranch Park based on community need.

Action 4.1-2g: If it becomes available, acquire the vacant lot adjacent to the Belmont Sports Complex for additional athletic fields for the community.

Policy 4.1-3: Ensure that all development projects comply with the City's parkland dedication requirements, in accordance with the Quimby Act, to provide adequate land for parks, open space, landscaping, and trails in appropriate locations through the dedication of land or otherwise providing for mini parks, planned trails, and other recreational space.

Action 4.1-3a: Meet with development applicants early in the entitlement process to ensure understanding of and compliance with the City's parkland dedication requirements.

Action 4.1-3b: If parkland is to be dedicated (rather than an in-lieu fee paid), work with the applicant during the site planning process to ensure that parks/recreation facilities are appropriately sited and designed to best serve the new development and the Belmont community at large.

Policy 4.2-2: Building on the needs assessment, improve the quality and quantity of public community facilities in Belmont.

Action 4.2-2a: Create a community-based vision for the new Barrett Community Center, and pursue implementation of the redesigned community center facilities. Consider changing the name to the Belmont Community Center.

Action 4.2-2b: Extend efforts to improve the quality of the athletic fields in Belmont.

Policy 4.2-3: Continue joint use agreements with other agencies, institutions, and private organizations for public use of recreational facilities not owned by the City, especially in neighborhoods deficient in recreational facilities, if the joint use agreements can help meet the city's recreational needs and if the terms are favorable to the City.

Action 4.2-3b: Consider pursuing joint use agreements with other public agencies, such as Sequoia Union High School District, for public use of recreational facilities, and review the terms of potential agreements to ensure they are favorable to the City.

Action 4.2-3c: Consider partnering with Notre Dame de Namur University, private schools, or other organizations to deliver recreational facilities to the community including at the site of Barrett Community Center.

Policy 4.3-1: Continue to provide recreational programs and services to serve the entire Belmont community.

Action 4.3-1a: Periodically conduct a programming needs assessment to determine the Belmont community's goals and needs for the types, amounts, and qualities of recreational programs and services. Ensure that the needs assessment considers the unique needs of various groups within Belmont, including but not limited to children, teens, and seniors.

Action 4.3-1c: Pursue creation of creative recreation facilities, even those that are small in size, into infill areas of redevelopment focus, such as the BVSP.

Policy 4.4-1: Continue to designate and protect open space lands for the preservation of scenic areas, natural drainage ways, and plant and wildlife habitats; for outdoor recreation; and for public health and safety.

Action 4.4-1a: Develop a policy for acquisition of open space lands in Belmont including consideration of condition, connectivity, and usefulness of the lands. Develop a list of preferred properties for acquisition that will enhance the open space resources in Belmont.

Policy 4.4-2: Maintain connectivity between large open spaces in Belmont and the region, including the Waterdog Lake area, San Juan Hills area, Sugarloaf Mountain, and the open space in the San Francisco Public Utility District's Crystal Spring.

Policy 4.4-4: Maintain and enhance trails in open spaces in Belmont. Continue to support opportunities for shared use of trails among multiple users, including pedestrians and mountain bicyclists. Promote knowledge, trail etiquette, and consideration of multiple users on trails through education programs and signage.

Policy 4.4-5: Use the Parks, Recreation, and Open Space Master Plan to establish priorities for the protection, enhancement, and improvement of open space lands and trails for recreation purposes.

Action 4.4-5a: Ensure that the updated Parks, Recreation, and Open Space Master Plan includes:

- Identification and implementation strategies for trail maintenance and design standards for trails through open space lands.
- Measures to improve the visual quality and safety of trails and bikeways.
- Identification trails that are no longer necessary or are causing resource damage such as erosion and implementation strategies to remove them

Policy 4.6-1: Maintain and improve access to parks and open space, especially in areas that lack land for additional parkland dedication and in areas where topography and lack of sidewalks inhibits easy pedestrian access to parks and recreation facilities.

Action 4.6-1a: Identify where formal or informal off-street paths and trails through neighborhoods are or can be established and maintained. Prioritize those paths and trails that improve pedestrian access and connectivity where it is currently limited, and where paths may link underserved neighborhoods to parks, recreation facilities, regional trails, and other community amenities.

Action 4.6-1b: Identify locations where trails and trail connections can be improved or established in open space recreation areas, such as potential new trail connections to the San Juan Canyon and Sugarloaf Mountain from the Vista Point.

Policy 4.7-1: Ensure that residential and nonresidential development projects contribute to the City's park, recreation, and open space resources commensurate with their impacts, through the Quimby Act and establishment and collection of park impact fees.

Action 4.7-1a: Periodically review and amend the City's parkland dedication and in-lieu fee requirements for residential subdivisions, consistent with the Quimby Act.

Action 4.7-1b: Periodically review park development costs and building trends to assess any changes in costs, and update the Park Impact Fee Nexus Study as needed, to establish new fees consistent with the Mitigation Fee Act (California Government Code Section 66000 et seq.).

4.13.3 Impact Analysis

a. Methodology and Significance Thresholds

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EIR, impacts related to public services and recreation from the project would be significant if implementation of the proposed project would:

1. Result in substantial adverse physical impacts associated with the need for or provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for:
 - a. Fire protection
 - b. Police protection
 - c. Schools
 - d. Parks
 - e. Other public facilities
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Additionally, for impacts to be considered significant, development of these public service and recreational facilities would also have to result in a significant physical environmental impact not already analyzed and disclosed in the other resource chapters of this EIR.

b. Project Impacts and Mitigation Measures

Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR FIRE PROTECTION SERVICES. HOWEVER, THIS INCREASE WOULD NOT REQUIRE ADDITIONAL AND/OR EXPANDED FIRE PROTECTION FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.12, *Population and Housing*, development facilitated by the project would add an estimated 8,063 residents to the City, increasing Belmont's population from 26,470 to 34,533 persons. Around half of the population growth would occur within the Belmont Village Priority Development Area (PDA). This population increase would incrementally increase demand for fire protection services.

Development facilitated by the project would increase calls for service throughout the City for issues including, but not limited to, emergency medical service, structure fires, and traffic collisions. The direct effect on the BFPD would include evaluation of staffing and resource deployment to accommodate the increase in call volume throughout the community including both Fire Stations 14 and 15. However, the BFPD currently has a 5:10 average response time which meets its response time standard of 6:59. Since all the Draft Housing Opportunity Sites are within 1.5 miles of the nearest fire stations, emergencies on these sites would be responded to within the response time goals.

According to Robert Marshall, Fire Marshal of the SMCDF, no new fire stations or apparatus would be anticipated under the project, and current staffing should be sufficient to accommodate for the population increase. The SMCDF currently has tentative plans to relocate the existing Fire Station number 15 on 2701 Cipriani Boulevard to Davis Drive. However, this relocation would not occur because of the project and would be subject to environmental review (Marshall 2021).

The SMCDF and BFPD are responsible for enforcing fire codes, providing fire inspections and assisting in planning and enforcing development standards for Wildland Urban Interface and Very High Fire Hazard Severity Zones (VHFHSZ). Development facilitated by the project would be required to comply with all applicable fire code and ordinances requirements for construction, emergency/fire, access, water mains, fire flows, and hydrants, and would be subject to review and approval by the BFPD prior to building permit and certificate of occupancy issuance. Development with modern materials and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance fire safety and support fire protection services. Additionally, prior to issuance of occupancy permits, project applicants would be required to pay City fees for Fire Code plan review and inspections.

General Plan Policies 6.6-1 to 6.6-11 are intended to reduce fire risk in the City by allocating resources to meet projected demands and response times, maintaining adequate fire resources

areas vulnerable to fires in VHFHSZ and Wildland Urban Interface areas, educating the public about local fire hazard prevention programs, and coordinating firefighting efforts with other local, state, and federal agencies. The BFPD receives its funding through property taxes and fees for service and can fund expanded services as new development occurs. Development facilitated by the project would be required to pay fire protection development impact fees to fund additional facilities and equipment. These funds, in addition to BFPD's share of the 1 percent property tax revenue within the district would help pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis. Furthermore, construction of a new fire station or expansion of an existing station would be subject to CEQA review at the time a site is identified and a specific design proposed. Therefore, impacts related to the provision of fire services would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?
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Impact PS-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR POLICE PROTECTION SERVICES, WHICH MAY RESULT IN THE NEED FOR NEW OR EXPANDED FACILITIES. CONFORMANCE WITH GENERAL PLAN POLICIES AND PROGRAMS RELATED TO POLICE PROTECTION WOULD REQUIRE THE CITY TO CONTINUE TO PROVIDE FUNDING AND ADEQUATE STAFFING, FACILITIES, EQUIPMENT, AND TECHNOLOGY TO MEET EXISTING AND PROJECTED SERVICE DEMANDS AND RESPONSE TIMES, WHICH WOULD REDUCE THIS IMPACT. FURTHERMORE, NEW OR EXPANDED FACILITIES WOULD BE SUBJECT TO ENVIRONMENTAL REVIEW UNDER CEQA. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.12, *Population and Housing*, development facilitated by the project would add an estimated 8,063 residents to the City, increasing Belmont's population from 26,470 to 34,533 persons. Based on BPD's current staffing level of 43 sworn officers, the BPD's officer/resident ratio would drop from 1.62 to 1.25 officers per 1,000 residents. The City currently does not have standards set for its response time or service ratio.

According to Ken Stenquist, Chief of Police, the BPD would have to increase staffing levels to include more personnel to serve the increase in population, even though they have been operating efficiently below the national standard of 1.5 to 2 officers per 1,000 residents. The BPD has not determined whether the BPD whether require a new facility. However, it is likely that existing police stations would have to be reconfigured or remodeled to accommodate for growth under the project (Stenquist 2021).

Policies 6.8-1, 6.8-3 and 6.8-4 in Belmont's Safety Element require the BPD to ensure there is adequate staffing, facilities, equipment, technology, and funding to meet existing services demands. Despite compliance with the above General Plan policies and applicable code requirements, the BPD

has stated that additional demand for police services would be accommodated through the expansion of police personnel and facilities to continue to meet the BPD's service standards. While no location has been identified for a new police station or an expansion of an existing station, Belmont is mostly developed and urbanized so any future facility would likely be developed as infill development. As infill development, it is not anticipated that the construction of a new police station would cause additional significant environmental impacts beyond those identified in this EIR. The environmental effects of constructing a police station would be consistent with the impacts determined in other sections of this EIR, which would be less than significant or less than significant with mitigation. When and if the BPD proposes a new station or expansion of an existing station and identifies an appropriate site and funding, the City will conduct a complete evaluation of the station's environmental impacts under CEQA. Therefore, impacts related to the provision of police services would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
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Impact PS-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE PLANNING AREA, WHICH COULD RESULT IN THE NEED FOR ADDITIONAL AND/OR EXPANDED SCHOOL FACILITIES. HOWEVER, GOVERNMENT CODE 65995 (B) WOULD REQUIRE FUNDING FOR THE PROVISION OR EXPANSION OF NEW SCHOOL FACILITIES TO OFFSET IMPACTS FROM THE PROJECT. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project could generate an estimated 2,416 students, including 1,265 elementary school students (Grade K-5), 506 middle school students (Grade 6-8), and 645 high school students (Grades 9-12).¹ As shown on Table 4.13-3, current enrollment capacity in the BRSSD would adequately accommodate additional students estimated as part of the project, while the SUHSD would not. However, the schools in aggregate would have adequate capacity to accommodate future students.

To offset a project's potential impact to schools, Government Code 65995 (b) establishes the base amount of allowable developer fees a school district can collect from development projects located within its boundaries. The fees obtained by BRSSD are used to maintain the desired school capacity and the maintenance and/or development of new school facilities. Development facilitated by the project would be subject to these State-mandated school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment

¹ Generation rates based on the City of Belmont General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan Draft Environmental Impact Report (City of Belmont 2017a). Generation rates for BRSSD (elementary and middle school) include 0.3922 for elementary school students (Grade K-5), and 0.1569 for middle school students (Grades 6-8). Generation rates for SUHSD (high school) include 0.2 for high school students (Grades 9-12).

of statutory fees “is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” Therefore, existing laws and regulations would require funding for the provision or expansion of new school facilities to offset impacts from the project and impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
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Impact PS-4 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR PARKS AND RECREATION SERVICES. HOWEVER, CONFORMANCE WITH BMC AND GENERAL PLAN POLICIES AND PROGRAMS RELATED TO OPEN SPACE WOULD REQUIRE USABLE OPEN SPACE IN NEW DEVELOPMENTS AND PAYMENT OF QUIMBY PARK IN-LIEU FEES AND PARK IMPACT FEES TO ENSURE ONGOING PARKLAND MAINTENANCE TO PREVENT DETERIORATION. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project would decrease the City’s parkland ratio from 4.2 acres per 1,000 residents to 3.2 acres per 1,000 residents, which is below the City standard of 5.0 acres per 1,000 residents. To satisfy the City’s parkland ratio by 2035, the City would have to add around 40.3 acres of parks and recreational facilities to overcome the existing deficiency. According to Table 2-1 in the Land Use Element of the 2035 General Plan, there are approximately 248 acres of vacant land within the City limits. Therefore, there would still be a sufficient amount of vacant land to meet the need for more parkland.

Moreover, the City contains 293.6 acres of existing open space, which provides 11.1 acres of open space for every 1,000 residents. When the parks and open space areas are combined, Belmont provides a total ratio of 15.3 acres of parks and open space per 1,000 residents.

Policies in the Parks, Recreation and Open Space Element of the General Plan ensure the maintenance and improvement of parks as well as the development and acquisition of additional facilities to meet future needs. Policies 4.1-1, 4.2-1 and 4.4-5 support facilities performance standards established by the Parks, Recreation, and Open Space Master Plan. Policy 4.1-3 ensures compliance with the Quimby Act requiring development projects provide adequate land for parks through park in-lieu fees, and Policy 4.7-1 requires new development to contribute park impact fees (City of Belmont 2017a). The Quimby parkland in-lieu fee only applies to parcels created through the Subdivision Map Act, while park improvement impact fees would apply to all new residential and nonresidential development.

Since there is still adequate land available, Quimby park in-lieu fees and park impact fees pursuant to BMC Chapter 17 Article IV would generate funds necessary for creation of new parks commensurate with new development, and policies in the General Plan would ensure maintenance

of existing levels of service for park and recreation facilities for existing and new residents. Therefore, impacts to parks and recreation facilities would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?
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Impact PS-5 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR THE USE OF PUBLIC FACILITIES SUCH AS LIBRARIES, RESULTING IN THE NEED FOR ADDITIONAL OPEN HOURS AND STAFFING AND POSSIBLY THE EXPANSION OF THE BELMONT LIBRARY. HOWEVER, CONFORMANCE WITH GENERAL PLAN POLICIES RELATED TO LIBRARIES WOULD REQUIRE THE CITY TO CONTINUE TO SUPPORT IMPROVEMENTS TO THE BELMONT LIBRARY. FURTHERMORE, ANY FUTURE PLANS TO EXPAND THE BELMONT LIBRARY WOULD BE SUBJECT TO ENVIRONMENTAL REVIEW UNDER CEQA. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.12, *Population and Housing*, development facilitated by the project would increase Belmont's population from 26,470 to 34,533 persons, a 23 percent increase of the City's estimated 2021 population. Given that not all new residents would visit the library frequently, the increase in monthly visitation would be lower than 23 percent.

According to Anne-Marie Despain, Director of Library Services at the SMCL, approximately 50 percent to 70 percent of the population registers for library services. The SMCL currently does not have plans to construct additional library facilities, although an increase in population under the project would increase the need for library hours, parking, staffing, and possibly expansion of the existing library. The SMCL is currently exploring options for additional outreach and bookmobile services as well as considering placing library outposts throughout their county service area. Furthermore, the SMCL is also exploring possibilities for co-locating libraries with future public housing, community services, or school projects.

While a less than 23 percent increase would be a large increase to the usage of the library, this is in line with ABAG's growth projections for the area and the growth is also anticipated to occur over the next eight years and would not occur all at once. Moreover, the library is funded from local property taxes, which would continue to be paid by property owners. Additionally, Policy 2.10-2 in the Land Use Element of the General Plan supports continued improvements to the Belmont Library in order to meet the needs of the Belmont community. Although there are currently no specific plans for a library expansion, the expansion would occur in an urbanized area in Belmont and would likely be developed as infill development. As infill development, it is not anticipated that expansion of the Belmont library would cause additional significant environmental impacts beyond those identified in this EIR. The environmental effects of the expansion would be consistent with the impacts determined in other sections of the EIR, which would be less than significant or less than significant with mitigation. When and if the SMCL proposes the expansion and identifies appropriate

funding, the City will conduct a complete evaluation of the library's environmental impacts under CEQA. Therefore, impacts related to the provision of library services would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Threshold:	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact PS-6 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR THE USE OF EXISTING PARKS AND RECREATIONAL FACILITIES, AND MAY REQUIRE THE CONSTRUCTION OR EXPANSION OF ADDITIONAL PARKS AND OPEN SPACE. HOWEVER, DEVELOPERS WOULD BE REQUIRED TO ADHERE TO POLICIES IN THE GENERAL PLAN AND BMC AND PAY PARKLAND FEES FOR NEW DEVELOPMENT. FEES WOULD FUND PARK IMPROVEMENTS AND MAINTENANCE AND THUS WOULD AVOID OR ADEQUATELY MITIGATE PHYSICAL DETERIORATION. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development under the project would increase the population of the City by an estimated 8,063 residents, resulting in a total City population of approximately 34,533 residents and a parkland ratio of 3.2 acres per 1,000 residents. This ratio is below the City standard of 5.0 acres of parkland per 1,000. However, pursuant to the State's 1975 Quimby Act, the General Plan establishes the required dedication of up to three acres per 1,000 residents, or up to five acres per 1,000 residents through the payment of Quimby parkland in-lieu fees to match the existing ratio if it is higher than three acres per 1,000 residents for all new developments. The City also adopted park impact fees for residential and nonresidential development, ensuring contribution to park and recreation resources commensurate with their impact (City of Belmont 2017d). General Plan policies in the Parks, Recreation and Open Space Element ensures compliance with the Quimby Act requiring development projects provide adequate land for parks through park in-lieu fees and requires new development to contribute park impact fees (City of Belmont 2017a). As discussed under Impact PS-4, the Quimby parkland in-lieu fee only applies to parcels created through the Subdivision Map Act, while park improvement impact fees would apply to all new residential and nonresidential development. Development facilitated by the project would need to comply with these requirements. Figures 2-2 and 2-3 in Section 2, *Project Description*, indicate the locations of approved and pending projects and Draft Housing Opportunity Sites under the project. Based on these figures, parks near the Belmont Village PDA such as Twin Pines Park, Alexander Park and Davey Glen Park would be most impacted by the proposed project. Most of the housing sites are located within 0.25 to 0.5 mile of an existing neighborhood/mini park or community park, and none are located more than 1 mile away. Since the City is largely built out, developers would need to provide dedicated parkland on the project site, parkland improvements, or pay in-lieu fees if they are unable to dedicate land or if the land is considered unsuitable for park and recreation use in order to comply with BMC Chapter 17, Article IV.

Construction and operational impacts to air, noise, and traffic, as well as other impacts of development facilitated by the project are discussed throughout this EIR. Impacts from the construction of new or expanded parks in the City would be similar to those identified in this EIR for construction or operation of development facilitated by the project. Similar to other types of development, the construction of new or expanded park facilities could potentially contribute to biological resource, historical resource and construction noise impacts identified in Sections 4.3, *Biological Resources*, 4.4, *Cultural Resources*, and 4.11, *Noise*, of this EIR. Construction would be required to adhere to policies contained in the Belmont 2035 General Plan and BMC. With adherence to the City's General Plan policies, the required payment of Quimby parkland in-lieu fees and park impact fees, Mitigation Measures, and project specific design features, the construction or expansion of park facilities would result in less-than-significant impacts.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.13.4 Cumulative Impacts

As discussed in the Impact Analysis, the addition of approximately 8,063 new residents to the City would not significantly reduce service times or ratios experienced to fire protection, police protection, schools, or other associated public facilities such as libraries. Although the increase would continue to place Belmont's parkland ratio below the standard of five acres per 1,000 persons, there are 293.6 acres of existing open space, which provides 11.1 acres of open space for every 1,000 residents. When the parks and open space areas are combined, Belmont provides a total ratio of 15.3 acres of parks and open space per 1,000 residents. As a result, this increase would not exacerbate the existing need for new or expanded park or recreational facilities over time. In the absence of new parks, the citywide and regional population (i.e., surrounding cities and unincorporated areas) increase would increase park demand and therefore would be expected to accelerate the deterioration of existing parks, which would be a potentially significant cumulative impact.

As discussed under Impacts PS-1, PS-2, PS-3 and PS-5, reasonably foreseeable development under the project could increase demand for fire protection and emergency medical services; would increase demand for police protection service; would increase demand for public facilities such as libraries; and would likely result in an increase in student enrollment that exceeds overall district capacity. However, development impact fees and property taxes collected from potential housing development proposed under the project would go towards any necessary facility upkeep or expansion. In addition, construction of new public service facilities or expansion of existing facilities would be subject to environmental review under CEQA. Therefore, the increase to these services would not constitute a cumulatively considerable contribution to the significant cumulative impact related to the deterioration of acceptable service ratios, response times, or other performance objectives for any of the public services listed above. Cumulative impacts would be less than significant.

As discussed under Impact PS-4, reasonably foreseeable development under the project would not result in a potentially significant impact related to the deterioration of existing parks or open space serving the urban areas, since there is adequate space to provide sufficient recreational acreage to

meet the projected increase in demand for parks based on the City's adopted standards. Furthermore, the City has updated its Quimby parkland in-lieu fees and park improvement impact fees which would ensure contribution to park and recreation resources commensurate with future development impact. Therefore, this would not constitute a cumulatively considerable contribution to the significant cumulative impact related to park deterioration, and the cumulative impact would be less than significant.

As discussed under Impact PS-6, development facilitated by the project in combination with other cumulative development in the county would result in an increase in the use of existing recreational facilities. Cumulative impacts to parks and recreational facilities would occur if development, and related population growth, within the City increases the use of existing facilities such that substantial physical deterioration of those facilities would occur, or if new facilities would need to be constructed or existing facilities expanded that would have an adverse effect on the environment. However, new development projects would have to adhere to Chapter 17, Article IV of the BMC and be required to provide Quimby parkland in-lieu fees and park improvement impact fees, which would ensure cumulative projects are served by adequate park and recreational facilities. Therefore, cumulative impacts related to new or expanded park and recreation facilities, or the physical deterioration of existing park and recreation facilities, would be less than significant, and the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact regarding park and recreation facilities.

Based on the above information, the incremental effect of the project with respect to the deterioration of public services and recreation facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.

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4.14 Transportation

This section analyzes the potential impacts of the project on transportation, including conflicts with transportation plans, vehicle miles traveled (VMT), project-related transportation hazards, and emergency access, associated with the implementation of the proposed project. The information provided in this section was based primarily on research and analysis provided by W-Trans, as well as a VMT Impact Assessment authored by Kittelson and Associates (Kittelson), included as Appendix TRA to this report.

4.14.1 Environmental Setting

The existing vehicular circulation, bicycle and pedestrian facilities, and transit services in the project vicinity are described below.

Travel Characteristics

Residents of Belmont rely primarily on motor vehicles for commuting, with 83.5 percent traveling by car, truck or van; 73.5 percent are solo drivers. Public transportation is used as the primary mode of commute transportation by 7 percent of workers, including 4 percent who use Caltrain. Approximately 3.1 percent of Belmont workers reported walking or biking to work, and 5.6 percent worked from home (United States Census Bureau 2019).

Belmont residents largely commute to workplaces in the surrounding communities, as 95.6 percent of employed residents work outside Belmont. In terms of commute distance, 84.9 percent of employed Belmont residents travel less than 25 miles to work, with 40.9 percent having commutes of less than 10 miles and 44 percent traveling 10 to 24 miles (United States Census Bureau 2019).

a. Existing Circulation System

The Belmont General Plan designates five classifications for the City's roadway network: 1) Major Highway, 2) Arterial, 3) Major Collector, 4) Collector, and 5) Local Street. These classifications are hierarchical, based on the volume and type of traffic associated with each street. Major highways largely serve through traffic and link the City to the regional transportation network. Arterials are the primary streets within the City, connecting major destinations to one another. Collectors provide connectivity between arterial streets and act as feeders for traffic from less densely developed areas. Local streets are low-volume, low-speed streets that primarily provide direct access to the abutting properties and typically offer limited connectivity to discourage through trips. They may connect to one or more collector streets.

Major Highways

US Route 101

US 101 is a north-south highway that runs between southern California and Washington State. Locally, it is configured as an eight-lane, grade-separated freeway and is a major corridor serving communities on the San Francisco Peninsula. The only interchange along US 101 in Belmont is at Ralston Avenue; in San Carlos, just south of the Belmont city limits, Harbor Boulevard provides access to and from southbound US 101.

State Route 92

State Route (SR) 92, which passes through San Mateo County north of Belmont, is one of the only east-west routes across the Peninsula, connecting Half Moon Bay with Foster City, and extending to the East Bay across the San Mateo-Hayward Bridge. The interchange of SR 92 at Ralston Avenue lies just outside the City limits, east of I-280. SR 92 is a six-lane freeway between I-880 in Hayward and US 101, including the San Mateo Bridge; it is a four-lane freeway between US 101 and I-280; west of I-280 it is considered an arterial and includes two lanes.

Interstate 280

A major north-south route along the Peninsula, Interstate 280 (I-280) is a freeway connecting San Jose with San Francisco. In the study area it is located just west of the Belmont City limits. Ralston Avenue provides access to I-280 via SR 92, as the SR 92/I-280 interchange is located approximately one-half of a mile west of the SR 92/Ralston Avenue interchange. Along the segment near Belmont, I-280 is an eight-lane, grade separated freeway.

Arterials

El Camino Real

El Camino Real, also designated as State Route 82 (SR 82), is a regional route that extends between I-880 in San Jose and I-280 in San Francisco. El Camino Real is a primary arterial roadway and commercial corridor through communities along the San Francisco Peninsula. Within Belmont, the roadway has two lanes in each direction, plus intersection turn lanes, and a posted speed limit of 35 miles per hour (mph).

Ralston Avenue

Ralston Avenue is the only major route providing east-west access through the City of Belmont, with access to and from US 101, SR 92, and I-280. The characteristics of the street transition along the corridor, depending on the context of the street and the adjacent land uses. Between SR 92 and Alameda de las Pulgas, it is a four-lane roadway with a median, few cross streets, minimal driveway access, and a 40-mph speed limit. East of Alameda de las Pulgas, the speed limit is 30 mph, with one lane in each direction and a center turn lane; this segment includes numerous residential driveways. East of South Road, the land uses along Ralston Avenue are commercial, with four travel lanes and turn lanes at most intersections. East of the US 101 interchange, the roadway becomes Marine Parkway and continues into Redwood Shores, a waterfront community of Redwood City to the south.

Alameda de las Pulgas

Alameda de las Pulgas runs north-south through Belmont, connecting to the cities of San Mateo and San Carlos. North of Ralston Avenue, there is one travel lane in each direction, the speed limit is 25 mph, and land uses are mostly residential. Between Ralston Avenue and Carlmont Drive the land uses are commercial and the posted speed limit is 30 mph. South of Carlmont Drive, there is generally one travel lane in each direction, a 30-mph speed limit, and a mix of residential and institutional land uses.

Major Collectors

Old County Road

Old County Road runs north-south along the east side of the Caltrain tracks and parallel to El Camino Real. Old County Road extends beyond the City of Belmont limits to both the north and south; within Belmont it has one lane in each direction with turn lanes at key intersections.

Sixth Avenue

Sixth Avenue is a north-south street, located west of El Camino Real. It connects Hill Street in the north to the City limits in the south, where it continues into San Carlos as Laurel Street. Sixth Avenue is designated as a major collector between O'Neill Avenue and the City line, as a minor collector from O'Neill Avenue to Ralston Avenue, and as a local street from Ralston Avenue to Hill Street. Sixth Avenue has one lane in each direction and is abutted by a mix of residential and commercial land uses (City of Belmont 2017a).

Masonic Way

Masonic Way provides an east-west connection between Old County Road and Hiller Street, one block north of Ralston Avenue. Masonic Way includes one travel lane in each direction and on street parking. Pedestrian access to the Caltrain station is available at its western terminus.

b. Existing Pedestrian and Bicycle Facilities

Pedestrian Facilities

The City of Belmont has pedestrian facilities that include sidewalks, pathways, curb ramps, crosswalks, curb extensions, and amenities such as pedestrian scale lighting, benches, transit shelters, and street trees. As part of its *Comprehensive Pedestrian and Bicycle Plan* (CPBP), the City of Belmont took an inventory of its sidewalks, looking at which parts of the city had continuous sidewalks on both sides of a roadway, sidewalks only on one sidewalk, or no sidewalk at all. There are approximately 85 miles of existing sidewalks currently provided within Belmont which is approximately 59 percent of all Belmont street frontages. Central, Cipriani, Downtown, and Plateau-Skymont neighborhoods have the majority of streets that lack sidewalks on both sides. In contrast, Belmont Heights, Homeview, McDougal, and Sterling Downs neighborhoods have sidewalks on both sides of the street (City of Belmont 2016). While the sidewalk network is generally complete in the downtown area, in some areas sidewalks are substandard, not present, or have gaps. Notable pedestrian facilities include the Children's Bridge, which provides pedestrian access across US 101 north of the Ralston Avenue/US 101 interchange.

Bicycle Facilities

Based on the Belmont CPBP (2016), bicycle facilities are classified into four types, including:

1. **Multi-Use Paths (Class I Bikeways)** – provide a completely separated, exclusive right-of-way for bicycling, walking, and other non-motorized uses.
2. **Bicycle Lanes (Class II Bikeways)** – use the appropriate striping, legends, and signs to mark a portion of a roadway that has been set aside for the preferential or exclusive use of bicyclists.
3. **Bicycle Routes (Class III Bikeways)** – are signed bicycle routes where riders share a travel lane with motorists.

4. **Separated Bikeway (Class IV Bikeways)** – are for the exclusive use of bicycles and include a physical barrier of separation between the bikeway and adjacent vehicle traffic.

Bike lanes include discontinuous segments along Ralston Avenue, including sections with the bike lane in only one direction. There are bike lanes along a segment along Alameda de las Pulgas, which is also a designated bike route between Ralston Avenue and the City line. Alameda de las Pulgas is designated as a bike route from the northern city limit to Ralston Avenue, and bike lanes are present from Ralston Avenue to the southern City limits. The Children’s Bridge, referenced under the pedestrian facilities discussion, also provides access for bicyclists across US 101. Existing Transit Service

The primary public transit providers in Belmont are the San Mateo County Transportation Agency (SamTrans) and Caltrain. In addition to services they directly provide, they offer connections to regional transit services and local services in other nearby jurisdictions.

SamTrans

SamTrans provides fixed-route bus service throughout San Mateo County, also providing connections to San Francisco and Palo Alto. The following routes, shown in Figure 4.14-1, serve the City of Belmont (SamTrans 2022a; SamTrans 2022b; SamTrans 2022c):

- ECR – Route ECR provides service along El Camino Real from the Palo Alto Transit Center to the Daly City Bay Area Rapid Transit (BART) Station. On weekdays, the bus runs every 20 minutes from approximately 4:00 a.m. until 2:00 a.m. On weekends, it runs every 30 minutes from 4:45 a.m. until 2:00 a.m.
- 397 – Route 397 runs between Downtown San Francisco and the Palo Alto Transit Center. It operates daily from approximately 1:00 a.m. until 6:30 a.m. with one-hour headways, with no mid-day or evening service. This route serves the San Francisco International Airport, the Millbrae Transit Center and the Redwood City Transit Center.
- 398 – Route 398 runs between the San Bruno BART Station and the Redwood City Transit Center, also serving the San Francisco International Airport. It runs hourly from 5:00 a.m. until 11:30 p.m. on weekdays and 6:00 a.m. to 11:30 p.m. on weekends.
- 60 – Route 60 is a school-day only bus route that runs between Ralston Middle School and Bridge Parkway/Bowsprit Drive. There are six buses heading to the school from 7:00 a.m. to 8:30 a.m. and four buses starting at the school and running in the opposite direction from 12:30 p.m. until 3:30 p.m. This route serves Ralston Middle School, Carlmont High School, the Belmont Library and the Belmont Caltrain Station.
- 62 – Route 62 is a school-day only bus route that runs between Carlmont High School and Dale View Avenue/Old County Road. There are two buses that operate in the southbound direction from 7:00 a.m. to 8:45 a.m. and one return bus departing at 3:35 p.m. This route serves Carlmont High School, Nesbit Elementary School, and Nesbit Middle School.
- 67 – Route 67 is a school-day only bus route that runs between Ralston Middle School and Bridge Parkway/Bowsprit Drive. There are three buses departing between 7:15 a.m. and 7:30 a.m. toward the middle school and six buses starting at the middle school and running in the eastbound direction from 12:45 p.m. to 3:30 p.m. This route serves Ralston Middle School and Notre Dame de Namur University.
- 68 – Route 68 is a school-day only bus route that runs between Ralston Middle School and Hiller Street/Wessex Way. Three buses head toward the school in the westbound direction between

7:30 a.m. and 7:40 a.m. and there are six buses running from the school in the eastbound direction from 12:30 p.m. until 3:30 p.m. This route serves the Notre Dame de Namur University and Ralston Middle School.

- 260 – Route 260 is a weekday route that travels between the San Carlos Caltrain Station and the College of San Mateo. It operates every 60 minutes from 6:00 a.m. until 6:30 p.m. This route serves the College of San Mateo, Crystal Springs Shopping Center and the County Youth Center.
- 295 – Route 295 is a weekday route that runs between the San Mateo Caltrain Station and the Redwood City Caltrain Station, also serving the station in San Carlos. It operates every two hours from 6:30 a.m. until 7:00 p.m. In Belmont, this route serves the Belmont Library, Hillsdale High School and the Hillsdale Shopping Center.

Paratransit

Paratransit is an on-demand curb-to-curb service for persons with disabilities who cannot independently use regular fixed-route transit services. The San Mateo Transit District's Redi-Wheels service provides paratransit in Belmont and other San Mateo County communities. Redi-Wheels operates daily service between the hours of 5:30 a.m. and midnight. Riders must have their eligibility certified by SamTrans and reservations can be made in advance (SamTrans 2022d).

Caltrain

Caltrain is the commuter rail line serving the San Francisco Peninsula, connecting Belmont with San Francisco to the north and San Jose and Gilroy to the south. On weekdays, there are 30 trains servicing the Belmont Station in the northbound and southbound directions (Caltrain 2022a). On weekends, there are 16 trains that stop at the station in each direction (Caltrain 2022b). The Belmont Caltrain Station is located on Ralston Avenue between El Camino Real and Old County Road. The station includes paid vehicle parking as well as racks and lockers for bicycle parking; lockers must be reserved.

BART

BART provides regional heavy-rail rapid transit service, with stations in Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara Counties. Although BART does not provide service to Belmont, connections to and from Belmont are available to the Millbrae and San Francisco International Airport stations via Caltrain and SamTrans.

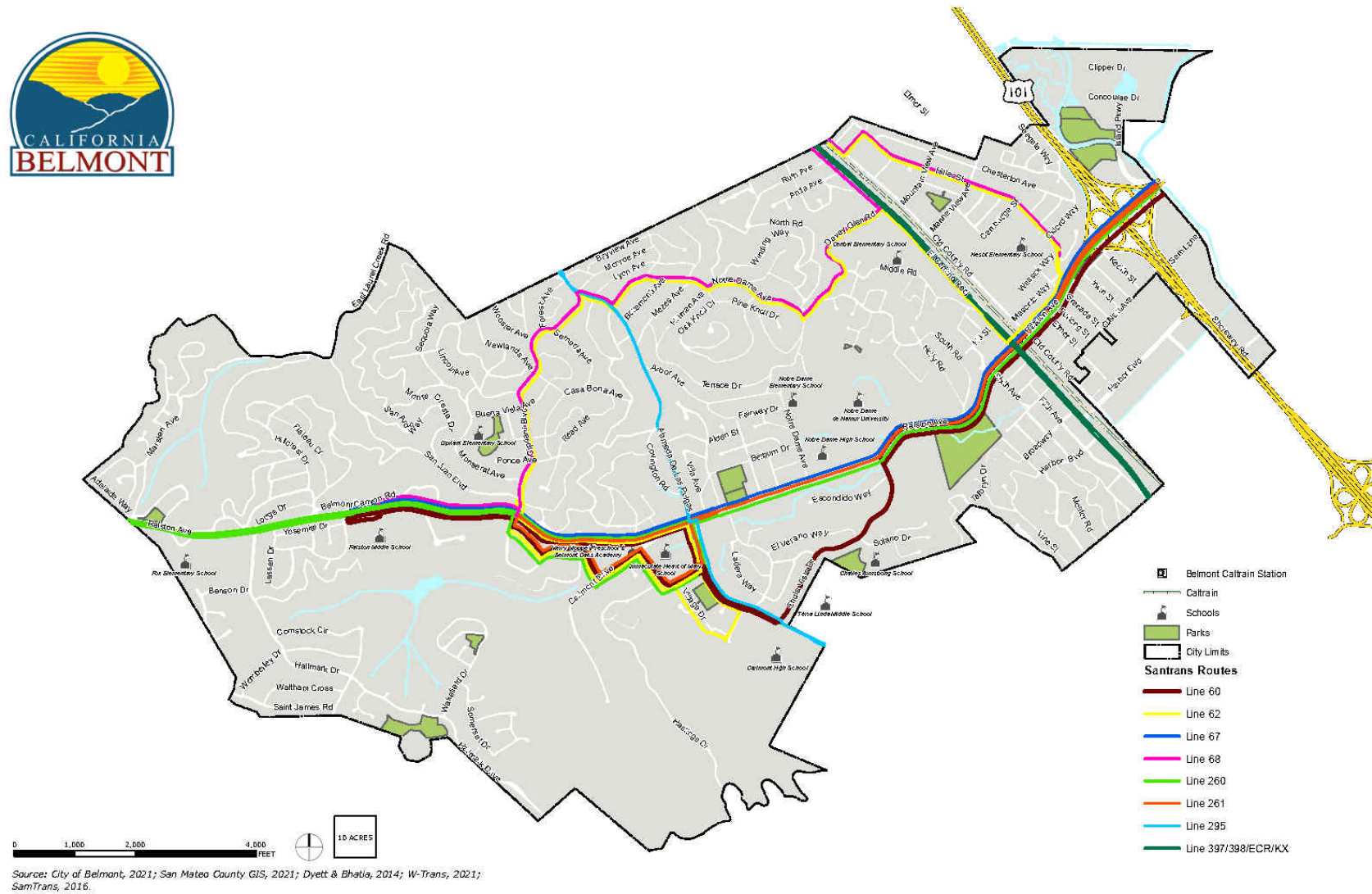
Private Commuter Shuttles

Numerous employers provide commuter shuttle service for their employees, with such services implemented by individual employers or through partnerships between multiple businesses. Such services provide transportation between employment sites and pickup points in residential areas or major transit stations; in Belmont, such shuttles provide service both for local residents working outside the City, as well as commuters coming into Belmont.

Park and Ride

The Ralston Park and Ride lot is the only such lot in the City, providing a place where commuters can leave their vehicles for the day and join a carpool or vanpool. Located on Ralston Avenue near SR 92, the lot is operated by the California Department of Transportation (Caltrans) and includes 25 spaces (Caltrans 2022).

Figure 4.14-1 Existing Transit Routes



On-Demand Transportation Services

On-demand private taxi services are available in Belmont 24 hours a day. Taxis can be used for trips within Belmont or for trips between Belmont and locations in other jurisdictions. Transportation network companies (TNCs) offer similar services in Belmont and throughout the Bay Area.

c. Existing Truck Routes

The City of Belmont Municipal Code Section 14.46 designates truck routes for vehicles exceeding a maximum gross weight, including load, of eight tons. All of Old County Road within the City and O'Neill Avenue from Old County Road to Kedith Street are designated as truck routes; in addition, Ralston Avenue is designated as a truck route for trucks and loads up to 13 tons.

d. Planned Roadway Improvements

Plan Bay Area 2050 includes several projects that would impact transportation to and from Belmont (Association of Bay Area Governments/Metropolitan Transportation Commission [ABAG/MTC] 2021). The emphasis of these investments is more efficient use the regional highway and transit infrastructure through capital and operational enhancements. Projects that would most directly affect Belmont include the following:

- Bus rapid transit (BRT) improvements to existing bus service along El Camino Real connecting Daly City BART with the Palo Alto Caltrain Station, including frequency upgrades, dedicated lanes along portions of the route, and addition of transit signal priority infrastructure.
- Caltrain frequency upgrades between San Francisco and San Jose.
- New express bus service along US 101 and I-280 (on express lanes where available) downtown and western San Francisco, including addition of park-and-ride facilities, ramp improvements and bus stop improvements.
- New express bus service along US 101, SR-85 and I-280 (on express lanes where available) between San Francisco (Salesforce Transit Center) and San Jose (Diridon Station). Improvements include high-frequency service and station area amenities such as upgraded local bus stops, taxi/TNC loading zones, and improved bicycle/pedestrian infrastructure.

4.14.2 Regulatory Setting

Local, regional, State, and Federal policies regulate many aspects of the City's transportation system, including planning and programming; design; operations; and funding. While the City of Belmont has primary responsibility for the maintenance and operation of local transportation facilities, there is ongoing coordination between Belmont staff and regional, state, and federal agencies to plan, manage, and enhance the City's transportation assets; these entities include San Mateo County, San Mateo County Transportation Authority (SMCTA), City/County Association of Governments of San Mateo County (C/CAG), Metropolitan Transportation Commission (MTC), Caltrans, regional transit providers and Federal Highway Administration.

a. State Regulations

California Department of Transportation (Caltrans)

Caltrans is the owner and operator of the state highway system, which includes facilities in and around Belmont. In its Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), 2020, Caltrans developed an approach for evaluating the transportation impacts of land use projects and plans on state highway facilities; this document does not address the impacts of transportation projects (Caltrans 2020). In accordance with current CEQA requirements, the TISG does not consider vehicle delay in its evaluation of transportation impacts, instead focusing on VMT. The purposes of the TISG include providing guidance to lead agencies regarding when they should analyze potential impacts to the state highway system; to aid Caltrans staff in reviewing projects; and to ensure consistency in the assessment of impacts and identification of non-capacity increasing mitigation measures. California Senate Bill 743 (SB 743)

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. Instead, SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reducing greenhouse gas emissions. In November 2017, Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommend using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *Guidelines* require all jurisdictions in California to use VMT-based thresholds of significance.

b. Local Regulations

San Mateo County Congestion Management Program 2019

The City/County Association of Governments of San Mateo County (C/CAG) is the designated Congestion Management Agency (CMA) for San Mateo County. In accordance with California Government Code Section 65088, each CMA is required to prepare and adopt a Congestion Management Program (CMP) on a biennial basis. The CMP includes monitoring and evaluation of Level of Service (LOS) along the designated CMP network, which includes US 101 and the El Camino Real/Ralston Avenue intersection in Belmont (C/CAG 2020). With the passage of SB 743, maintenance of LOS standards is no longer part of the assessment of project impacts under CEQA.

San Mateo County Transportation Authority

The San Mateo County Transportation Authority (SMCTA) is an independent agency governed by an appointed board of seven directors who are elected officials representing the county, cities, and the San Mateo Transit District. The SMCTA plans, finds, and delivers transportation programs and projects throughout San Mateo County. The SMCTA was formed in 1988 with the passage of the voter-approved half-cent sales tax for countywide transportation projects and programs known as Measure A. The original Measure A ran through 2008 and was reauthorized by voters in 2004 to extend through 2033. The SMCTA administers the proceeds from Measure A to fund a broad spectrum of transportation-related projects and programs.

The SMCTA's Strategic Plan 2020-2024 provides a policy framework for guiding programming and allocation decisions over the next 5 years for Measure A and Measure W with Measure A focused on countywide transportation projects and programs and Measure W focused on improving transit and relieving traffic congestion. Measure A fund expenditures are guided by Expenditure Plans approved by the voters. The Expenditure Plan includes six key programs: transit, highway, local streets and transportation, grade separation, pedestrian and bicycles, and alternative congestion relief (SMCTA 2021).

City of Belmont 2035 General Plan

The City of Belmont General Plan Circulation Element (2017a) includes a number of goals, policies and actions addressing traffic, roadways, transit, and bicycle and pedestrian facilities. The Circulation Element adopted an approach that makes optimal use of the existing roadway capacity through coordination of transportation and land use planning. As stated in the Plan, transportation improvements are "designed to enhance accessibility and connectivity, accommodate additional growth, reduce congestion, and improve safety for all users of the transportation system." Following are relevant policies and actions identified in the General Plan Circulation Element, including:

Goal 3.1 **Provide for the safe and efficient movement of people and vehicles within and through the community that fosters accessibility and connectivity; accommodates a mixture of automobiles, transit, bicyclists, and pedestrians; and encourages higher transit ridership.**

Policy 3.1-1: Ensure land use and circulation planning is developed concurrently. In portions of Belmont that include significant open space resources, use area plans to address the balance and interface between natural and developed areas.

Action 3.1-1a: Pursue multimodal transportation infrastructure improvements needed to accommodate growth and land use changes proposed in the Land Use Element, particularly in areas where increased development intensity is planned, such as in the Belmont Village PDA and along the El Camino Real corridor. Support innovative site design techniques such as cluster-type housing to preserve sensitive environmental resources.

Policy 3.1-2: Make Complete Streets practices a part of Belmont's planning, design, and operation of its circulation network, acknowledging that a flexible and context-sensitive approach to design will result in each roadway serving most users and the roadway network as a whole serving all users.

Policy 3.1-3: Understand the unique needs for connectivity between neighborhoods and implement various strategies to promote Complete Streets in and between all neighborhoods.

Policy 3.1-5 : Require new development and redevelopment projects to construct or pay their fair share toward improvements for all travel modes to provide and enhance connectivity to existing transportation facilities.

Goal 3.2 **Reduce dependence on the private automobile for travel and achieve a reduction in vehicle-miles traveled (VMT) per capita of 15 percent by year 2035, consistent with ABAG's Plan Bay Area VMT reduction targets.**

Policy 3.2-4: Support thoughtful and appropriate land use locations and densities with development or redevelopment in Belmont that promote alternatives to travel via single-occupant vehicles.

Policy 3.3-5: Participate with other cities in the county and across the region towards solution of regional land use and transportation planning issues.

Goal 3.4 **Accommodate modes of transportation on routes that are designed within the context of the surrounding area to provide for the enjoyment and safety of the individual and to cause minimum interference and appropriate compatibility with adjacent uses of land.**

Policy 3.4-1: Maintain and improve existing transportation facilities to ensure safety and reasonable convenience of use. Additional facilities shall be limited to local access roadways for improved connectivity only in areas of dense development, such as the Belmont Village PDA.

Policy 3.4-8: Minimize unsafe conditions due to through traffic in residential areas through reasonable actions taken to re-route the traffic, or otherwise reduce the traffic or mitigate its effects.

Goal 3.5 **Promote, provide, and maintain a safe and convenient pedestrian and bicycle system of hiking and riding trails, pedestrian paths, bicycle paths and lanes to: promote active transportation; reduce dependence on automobiles; provide recreation; furnish easy access to trails; permit safe, pleasant travel among parts of the community; connect local areas and destinations within the city through trails and paths and regional trail and path systems; and create opportunities for nature and conservation education.**

Policy 3.5-1: Preserve and maintain Belmont's existing sidewalks and pedestrian paths.

Policy 3.5-2: Require public sidewalks in conjunction with all new non-residential development.

Policy 3.5-3: Require public sidewalks in all new residential developments except in areas where construction of sidewalks would be incompatible with existing development and/or require excessive grading or tree removal. In such cases, adequate roadway shoulders, or alternative trails and pathways shall be provided to ensure the safety of pedestrians and cyclists.

Policy 3.5-8: Support and provide bicycle and pedestrian connections to commercial and employment areas to enhance accessibility.

Policy 3.5-15: Ensure that new development projects provide bicycle and pedestrian improvements to facilitate the implementation of adopted Safe Routes to School plans.

Policy 3.5-16: Locate sidewalks, pedestrian paths, and appropriate crosswalks to facilitate access to all schools and other areas with significant pedestrian traffic. Whenever feasible, pedestrian paths shall be developed to allow for unobstructed pedestrian flow within a neighborhood.

Goal 3.6 Promote Transportation Demand Management Programs and encourage increased transit use through convenient, safe, efficient, and cost-effective services

Policy 3.6-4: Ensure that major new development is adequately served by transit.

Belmont Village Specific Plan

The Belmont Village Specific Plan was undertaken to provide a framework for development of a mixed-use downtown, including housing, employment opportunities, shopping, and entertainment. The plan emphasized use of a complete streets approach to street design and included enhancements to support increased use non-vehicle transportation modes. The Mobility Element of the City of Belmont's Belmont Village Specific Plan contains the following goals and policies relevant to the proposed project (City of Belmont 2017b):

Policy 3.1-2: Pursue Complete Streets transportation infrastructure improvements needed to accommodate growth and land use changes proposed in Belmont Village

Policy 3.1-3: Create an accessible circulation network that is consistent with guidelines established by the Americans with Disabilities Act (ADA), allowing mobility-impaired users, such as the disabled and seniors, to safely and effectively travel within and beyond the City. Limit driveways within the Village Core area to one per block face to the greatest extent feasible;

- Prohibiting an increase in the number of driveways on Ralston Avenue between Sixth Avenue and El Camino Real; and
- Strongly encouraging an overall reduction in the number of driveways on Ralston Avenue between Sixth Avenue and El Camino Real as properties redevelop.

Policy 3.2-2: Improve facilities to encourage more bicycle and pedestrian travel. Improvements should include, but are not limited to:

- Provide on-street bike racks along streets within the Planning Area;
- Widen sidewalks within the Planning Area to accommodate two-way pedestrian movement and allow sufficient space for pedestrian amenities and street furnishings;
- Provide pedestrian-scaled lighting along streets and within public spaces throughout the Planning Area; and,
- Incorporate bicycle detection into existing signals.

Policy 3.2-10: Enhance El Camino Real to better serve as a Boulevard and major connection for all modes of transportation, including pedestrians and bicyclists.

Policy 3.2-26: Enhance connectivity between the Village Core and the Caltrain Station by providing a new crossing for bicyclists and pedestrians on El Camino Real at Hill Street. The intersection crossing should consider, but is not limited to, the following improvements:

- A traffic signal to achieve safe and effective connectivity;
- Curb extensions and median refuge islands to shorten the crossing distance and provide waiting space while crossing;

- Removal of evergreen trees in the existing median to the extent necessary to accommodate the refuge island and improve visibility;
- Accommodation of two-way bicycle travel with a crossbike and/or clear signage; and,
- Additional wayfinding and branding to direct travels from the designated crossing location to destinations on either side.

Policy 3.3-1: Create inviting bus stops with benches, shelters, pedestrian-scaled lighting, and other amenities at bus stops within the Planning Area.

Policy 3.3-2: Work with SamTrans on bus stop relocation as other improvements (streetscape, roadway and property development) occur. In particular, consideration should be given to:

- The stop for westbound buses on Ralston Avenue currently located between El Camino Real and Sixth Avenue, when the Fifth Avenue extension and Village Core redevelopment occurs; and
- Creating a “bus hub” on the Caltrain property and/or the City-owned property adjacent to the Caltrain station (at Old County Road), to consolidate service and better facilitate transfers between transit providers.

Policy 3.3-3: Improve access to Caltrain for all transportation modes by:

- Maintaining existing bike parking and providing additional bike parking at the Caltrain station area as demand increases;
- Providing a direct pedestrian and bicycle connection through the Caltrain station from Masonic Way to Hill Street; and,
- Coordinating with the High Speed Rail Authority to ensure future improvements do not impede walking or biking to and through the station area; and
- Improving bus connections through facility and schedule improvements, in coordination.

Policy 3.4-1: Implement Transportation Demand Management for developments in the Planning Area. Require development projects to implement TDM measures according to the Village zoning regulations and encourage projects not meeting the threshold to consider implementing TDM.

Policy 3.5-1: Minimize the number of parking spaces in the Village Core to the extent feasible.

- Implement parking management strategies through the creation of a parking management plan that includes parking minimums and maximums for each land use.
- Encourage the use of shared parking facilities within multi-tenant buildings and between adjacent private developments.
- Unbundle parking by renting or selling parking spaces separately from commercial and residential property.

San Mateo County Comprehensive Bicycle and Pedestrian Plan

The San Mateo County Comprehensive Bicycle and Pedestrian Plan was adopted in 2011. The plan provides a high-level overview of pedestrian and bicycle facilities and designates pedestrian focus areas for all of the cities within San Mateo County. Within Belmont, the plan identifies El Camino Real and areas around schools as pedestrian focus areas. This plan is intended to identify areas where bicycle and pedestrian facilities should be prioritized but does not identify specific improvements (C/CAG 2011).

Belmont Comprehensive Pedestrian and Bicycle Plan

The CPBP was adopted in November 2016 (City of Belmont 2016). The goals of the CPBP directly support the multimodal circulation vision for the City and the implementation of the State's, Regional MTC, and the City's Complete Streets Policies. The Plan proposes to expand the existing bicycle and pedestrian networks to connect all neighborhoods in Belmont and to implement bicycle-related programs and support facilities. Existing and planned facilities are shown in Figure 4.14-2.

Belmont Vehicle Miles Traveled (VMT) Policy

To support implementation of SB 743 in a manner that meets local needs, the City adopted a policy that specified metrics and thresholds for evaluating the potential VMT impacts of development, long-range plans, and transportation projects. The City's policy is generally consistent with the OPR technical advisory and establishes a significance threshold new development to achieve a 15 percent reduction below the San Mateo County average VMT. Housing and mixed use projects are exempt from VMT analysis if they are located within the Belmont Village Specific Plan area, within one-quarter mile of El Camino Real, within one-half mile of the Belmont Caltrain station, include at least 50 percent affordable housing, or generate fewer than 110 trips per day (City of Belmont 2021b).

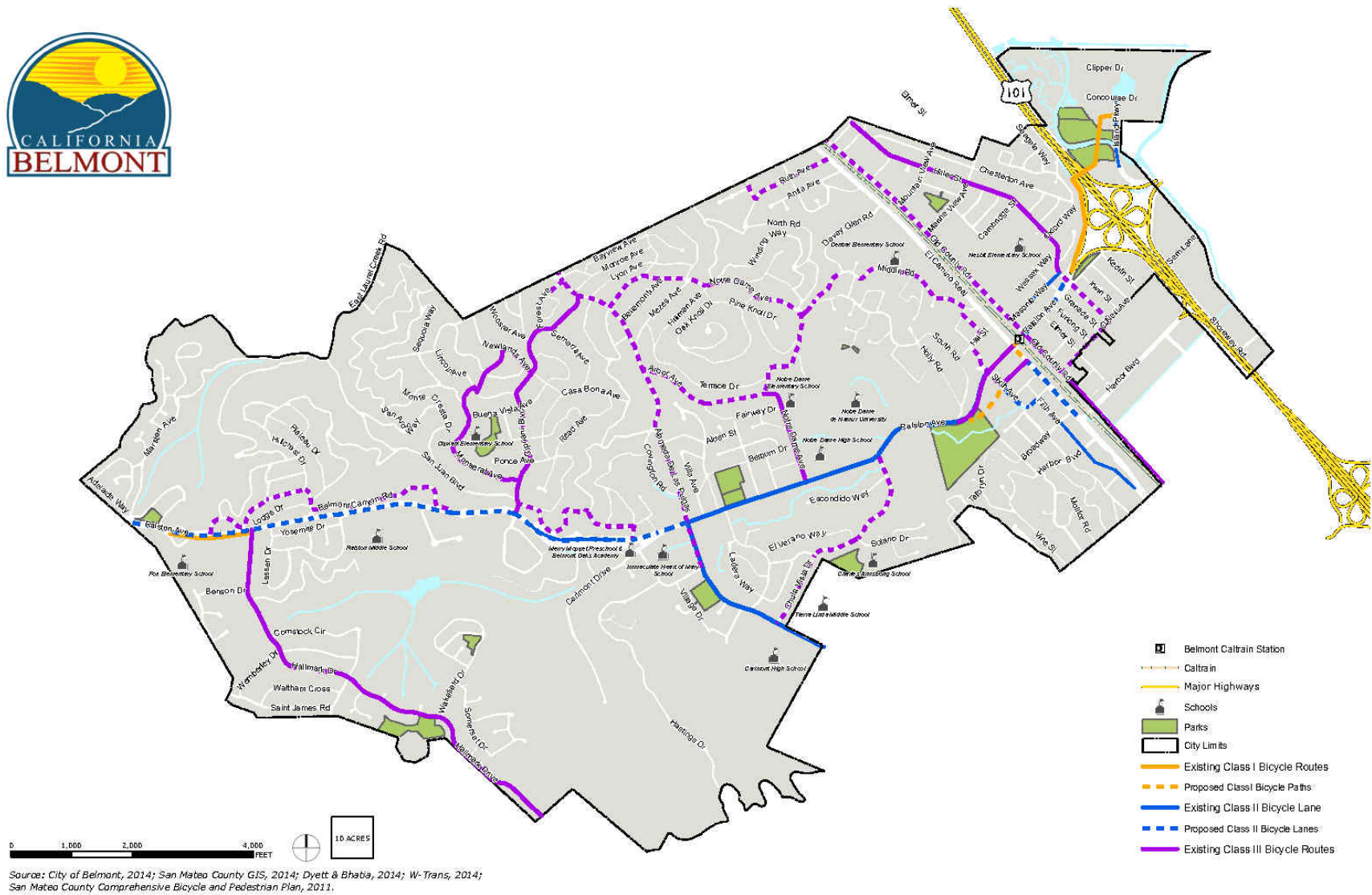
Belmont Complete Streets Policy

The City adopted a Complete Streets Policy in 2013 to support the development of a multimodal transportation network that serves all categories of users. Provisions of the policy include applying a context-sensitive approach to local conditions, so that appropriate facilities will be designed to best serve the needs of residential as well as commercial areas, with consideration for the urban, suburban, or rural nature of the location (City of Belmont 2013).

Transportation Demand Management Program

The City of Belmont has adopted a Transportation Demand Management (TDM) program with requirements that apply to all new residential development, with the exception of single-family dwellings and accessory units; staff also has the authority to exempt projects of two to five units and 100 percent affordable housing projects of any size from TDM requirements. Based on the number of units, each project must identify TDM measures worth the number of points specified in the program guidelines. The point system was designed to reduce the VMT for each residential project to a level that is 15 percent below the citywide VMT per capita. To demonstrate compliance with the TDM program, applicants must meet monitoring requirements. For projects not in compliance with program requirements, the City may require project owners/operators to modify their previously approved TDM measures (City of Belmont 2021a).

Figure 4.14-2 Existing Bike Facilities



Transportation Impact Fees

Pursuant to the City's Development Fee Impact Ordinance (Belmont City Code Chapter 17, Article III) the City has adopted transportation impact fees (Resolution 2020-103; adopted November 24, 2020) to require new development to fund a proportional share of infrastructure improvements to offset potential transportation impacts, which would affect the quality of service, safety, and other factors. For residential development, the fees are assessed on a per unit basis for single family, multifamily, and accessory dwelling units.

4.14.3 Impact Analysis

Analysis in this section regarding VMT comes from a VMT Impact Assessment authored by Kittelson and Associates (Kittelson) using the City/County Association of Governments of San Mateo County Travel Demand Model (C/CAG-VTA Model) of the Draft Housing Opportunity Sites. The assessment is based on SB 743 requirements and City of Belmont VMT Guidelines and screening criteria. The full assessment can be found as Appendix TRA attached to this report.

a. Thresholds of Significance

In accordance with Appendix G of the *CEQA Guidelines*, the Project would be considered to have a significant transportation impact if it would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
3. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access.

b. Methodology

CEQA Guidelines Section 15064.3 establishes that VMT is the most appropriate metric for the analysis of transportation impacts under CEQA.

VMT measures the amount of driving that a project generates. For example, a project generating 100 total (inbound and outbound) vehicle trips per day with an average of 5.0 miles per trip results in 500 project generated VMT per day. For the purposes of analyzing transportation impacts of residential projects, the VMT generated by the project is converted to an efficiency metric by dividing the amount of VMT generated by the number of residents. Efficiency metrics are used in VMT analysis because the goal of the analysis is to show whether or not a particular plan or development project would generate low enough VMT to aid the State in meeting its climate targets relative to projected growth in population, employment, etc.

The Governor's OPR provided guidance in its *Technical Advisory on Evaluating Transportation Impacts in CEQA* on performing the analysis of VMT and what thresholds of significance could be applied (OPR 2018). City Council adopted its VMT policy on February 23, 2021. The City opted to compare its VMT to the San Mateo County average. Based on OPR and City guidelines, any development that does not screen out a VMT assessment should produce a VMT per capita of 15 percent less than the San Mateo County average.

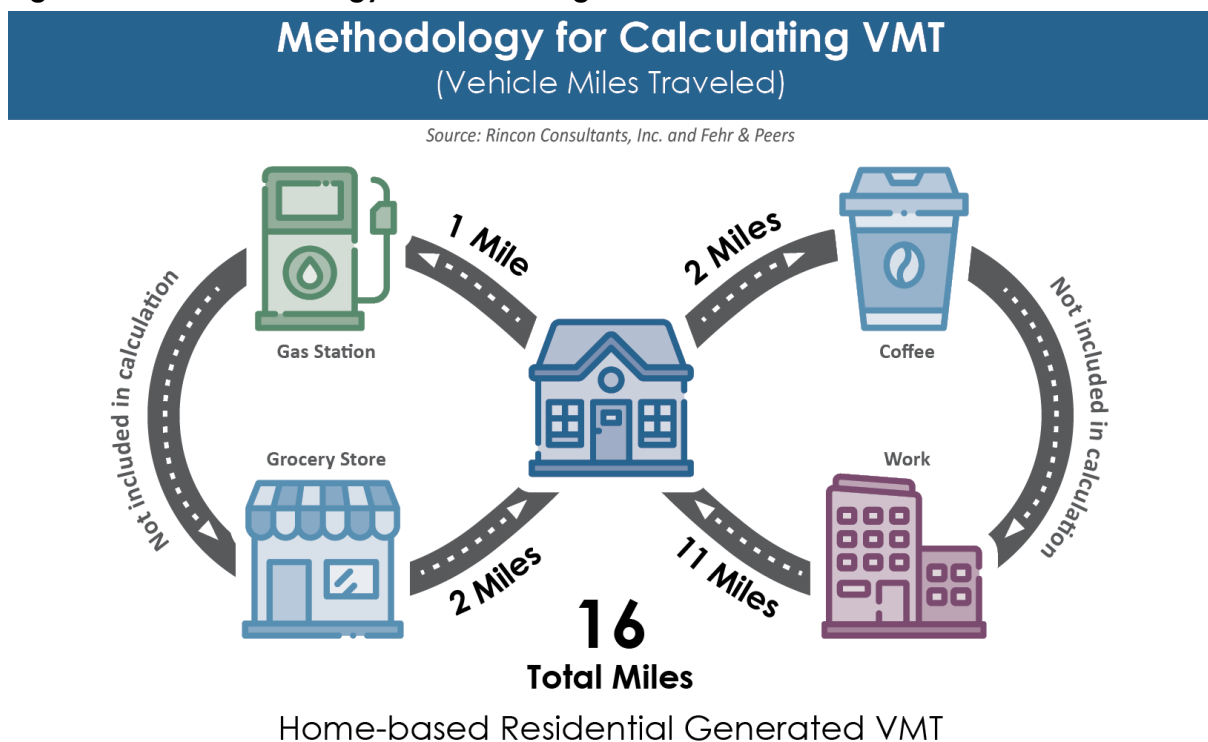
Screening criteria for CEQA Exemptions within the City of Belmont include the following housing projects or mixed-use projects with at least 75 percent housing that are:

1. Within the Belmont Village Specific Plan (BVSP)
2. Within ½ mile of the Caltrain station
3. Within a ¼ mile of El Camino Real which has 15-minute frequency bus service.
4. Contains at least 50% affordable housing
5. All projects (housing or non-housing) expected to generate less than 110 daily trips (usually around 12 multi-family or 10 single-family residential units) are also exempt.

Based on the guidance in the *Technical Advisory*, the VMT analysis of the proposed project compares countywide VMT averages to the project's VMT per capita outputs. Project VMT per capita rates that are higher than 15 percent below countywide averages are considered impacted for VMT under CEQA.

Home-based VMT per resident is calculated as the sum of mileage from vehicle trips with a start or end at a residence divided by the number of residents per household. Figure 4.14-3 shows a generic methodology for calculating VMT and illustrates how home-based VMT per resident considers some, but not all, of the amount of driving a person does during the day.

Figure 4.14-3 Methodology for Calculating VMT



Threshold: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
--

Impact TRA-1 THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project would result in an increased number of residential units and therefore increased use of the transportation system. Based on the proximity of the Draft Housing Opportunity Sites to commercial areas and high-quality transit, the project would support the development of land development patterns that would allow for shorter trips and non-vehicle modes of transportation. Therefore, the project would generate additional walking, bicycling, and transit trips.

While the locations of the Draft Housing Opportunity Sites have been identified, specific projects have not been proposed. Therefore, while the magnitude of the potential development is known, information is not available regarding the location, the design of project access points, and the adequacy of on-site pedestrian circulation; therefore, the site-specific impacts of development facilitated by the project on pedestrian, bicycle, and transit facilities cannot be evaluated at this time. To ensure that development facilitated by the project would not conflict with existing or planned facilities supporting those travel modes, those projects would be assessed by the City to determine compatibility with existing transportation programs, plans, ordinances, and policies; future pedestrian, bicycle, and transit facilities would be designed using the appropriate design standards and guidelines.

The project does not include transportation policies and was therefore evaluated for its consistency with policies in the adopted General Plan. These policies and actions include General Plan Policy 3.1-1, Action 3.1-1a, and Policy 3.1-2 which emphasize coordination between land use and transportation and encourage the development of complete streets and multimodal infrastructure. General Plan Policies 3.4-1, 3.5-1, 3.5-2, 3.5-3, 3.5-8, 3.5-15, and 3.5-16 provide for preservation, maintenance, and construction of sidewalks and bicycle facilities to improve access of pedestrians and bicyclists to transit service, commercial areas, and other destinations. The Draft Housing Opportunity Sites are largely concentrated within one-half mile of the Caltrain Station and/or one-quarter mile of El Camino Real; based on the proximity of these Draft Housing Opportunity Sites to transit and commercial destinations, they would be expected to generate transit, pedestrian, and bicycle trips. Compliance with General Plan Policy 3.6-4 would ensure that new development facilitated by the project would be adequately served by transit. As a result, the proposed land use pattern associated with the Housing Element is supportive of the General Plan policies and would be expected to further encourage the uses of transit and active transportation modes.

For Draft Housing Opportunity Sites located within the Belmont Village Specific Plan, compliance with Belmont Village Specific Plan transportation policies such as Policies 3.1-2, 3.1-3, 3.2-2, 3.2-10, 3.2-26, 3.3-1, 3.3-2, and 3.4-1 which focus on the development of Complete Streets and multimodal transportation facilities would ensure that development facilitated by the project would be consistent with the Belmont Village Specific Plan.

Therefore, with respect to conflicts with circulation system policies, the impact of the project would be less than significant. Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
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Impact TRA-2 THE PROJECT WOULD NOT CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Project VMT was assessed using the most recent version of C/CAG-VTA's Countywide Model. The model is based on the transportation network assumptions from Plan Bay Area 2040 (the Bay Area's Regional Transportation Plan/Sustainable Communities Strategy) and the corresponding population, housing and employment forecasts developed by the Association of Bay Area Governments (ABAG). The Draft Housing Opportunity Sites and proposed number of units were allocated based on Belmont's traffic analysis zones (TAZ) as identified in the model.

The following scenarios were analyzed:

- Existing Conditions (2019): Reflects current conditions without the project.
- Existing plus Project (2019): Adds buildout of the Housing Element to existing conditions.
- Cumulative (2040): Reflects future conditions including regional growth and buildout of the current General Plan.
- Cumulative plus Project (2040): Adds building of the Housing Element to the Cumulative scenario.

The VMT estimates for each scenario are presented in Table 4.14-1, including a comparison between City of Belmont and San Mateo Countywide VMT per capita; additional detail of the VMT analysis is presented in Appendix TRA.

Table 4.14-1 Vehicle Miles Traveled (VMT) Estimates by Analysis Scenario

Scenario	City of Belmont VMT	City of Belmont VMT per Capita	San Mateo Countywide VMT per Capita
Existing	482,793	15.13	15.71
Existing plus Project	604,110	15.04	15.83
Cumulative	579,283	15.28	14.90
Cumulative plus Project	692,223	14.99	14.93

Applying the metrics from the adopted City policy discussed in the Methodology section, the project was evaluated based on home-based VMT per capita, which is equal to the total miles traveled from trips beginning or ending at a residence; this includes trips to or from all destinations, such as work, shopping, or school. Since home-based VMT per capita is a measure of VMT per person, it is considered to be an efficiency metric, as opposed to measuring the amount of VMT generated by the project.

The City's VMT policy screening criteria were applied to all of the Draft Housing Opportunity Sites. It was determined that 3,262 (98.8 percent) of the 3,300 proposed units would be screened out from VMT analysis at the project level due to proximity to the Caltrain station or El Camino Real (as measured based on the location of the project driveway), indicating that residents of housing built

on these sites would be within acceptable walking distance of high-quality transit. The location of the Draft Housing Opportunity Sites and the VMT screening buffer areas are presented in Figure 4.14-4.

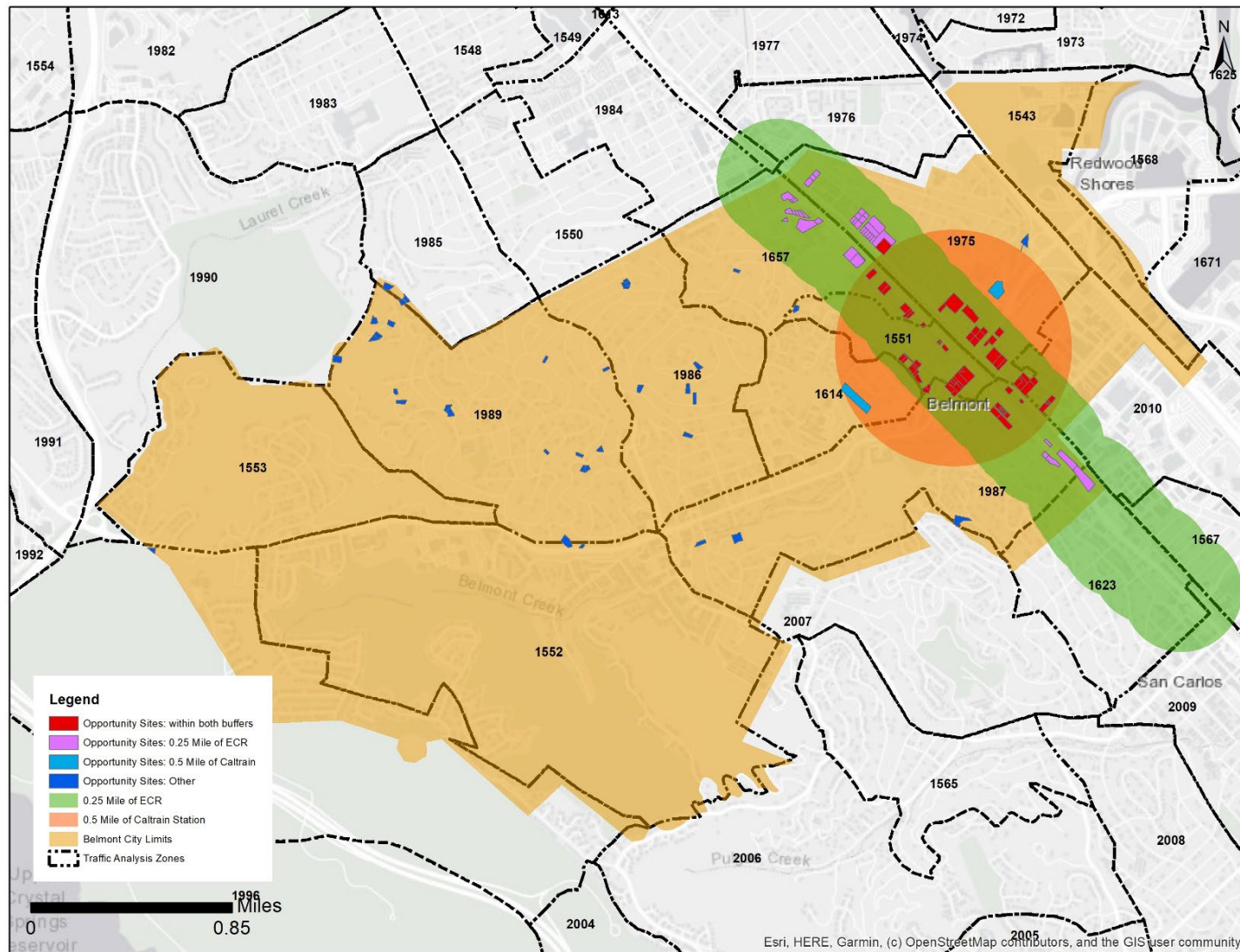
The Draft Housing Opportunity Sites located outside the City's specified buffer from the Caltrain station or El Camino Real include a total of 38 units; 26 of these units would be single-family residences; four sites would include two units each; and one site would include four units. As discussed in Section 2, *Project Description* these Draft Housing Opportunity Sites are zoned for development and could be developed as analyzed with or without the proposed project, as the project would not change the allowed density or uses on these sites. Therefore, there would be no change between what is allowed under baseline conditions and under the proposed project. Furthermore, by applying standard Institute of Transportation Engineers (ITE) trip generation rates, each these projects would generate fewer than the City's 110 trips per day threshold that defines small projects; pursuant to the City's VMT policy, and that are therefore assumed to have a less than significant impact. Therefore, there would be no impact related to these sites and associated housing units. The location of these units is summarized by TAZ in Table 4.14-2.

Table 4.14-2 Proposed Housing Units by Traffic Analysis Zone (TAZ)

TAZ	Proposed Dwelling Units	VMT Per Capita
1551	1	10.2
1552	1	19.1
1657	2	13.8
1975	1	15.1
1985 ¹	2	11.1
1986	5	14.3
1987	3	11.1
1989	23	17.4
Countywide	N/A	15.71

¹ Not currently within the city limits, the City of Belmont is seeking to annex this zone.

Figure 4.14-4 Draft Housing Opportunity Sites in relation to VMT Screening Buffer Areas



The City VMT policy also indicates that projects with at least a 50 percent affordable component would screen out from VMT analysis, and this would likely apply to some of the projects included in the Housing Element. However, it is unclear at this time which projects would include affordable units and what percentage would be affordable. Therefore, this criterion was not applied.

As noted in the Regulatory Setting section, the City has an adopted TDM Program that was developed to reduce VMT on a citywide basis. The policy requires all residential projects other than single-family dwellings and accessory units to reduce their estimated VMT by 15 percent below the countywide average; projects with two to five units and 100 percent affordable housing projects of any size can potentially be exempted from this requirement. The TDM policy includes a clearly defined set of measures and a point system to guide the application of TDM measures at the project level. To achieve the maximum feasible reductions, the policy includes detailed requirements to support the implementation of TDM measures, including a review of design plans, tenant agreements and other related materials as part of the development review process and a pre-occupancy site visit by staff to ensure compliance. Annual monitoring or self-monitoring by the applicant/tenant/owner is required to demonstrate ongoing compliance with the TDM policy, and the project owner may be required to modify previously approved measures if the City determines that the project is not compliant. In addition, pursuant to Policy 3.1-5 of the General Plan's Circulation Element, development facilitated by the project would be required to contribute to the City's Transportation Impact Fee program to mitigate impacts to and improve upon the existing transportation infrastructure (Kittelson & Associates 2020). Furthermore, future development would also be required to comply with applicable General Plan and Belmont Village Specific Plan goals, policies, and actions mentioned above under Section 4.14.2b which would promote the use of alternative modes of transportation and further reduce VMT in the City.

As indicated in the California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, And Advancing Health and Equity*, VMT mitigation is deemed to be feasible up to approximately 15 percent in suburban environments, which coincides with the City's target (CAPCOA 2021). The feasibility of achieving this reduction at any specific location depends on numerous factors, including project location relative to high quality transit, the extent and quality of pedestrian and bicycle facilities, and the mix and density of nearby land uses.

Based on the application of the City of Belmont's VMT screening criteria to the number and location of the units, the proposed Housing Element would result in a less than significant impact for VMT. Given the 15 percent trip reduction goal of the City's TDM requirements, the required payment of Transportation Impact Fees from future development, and compliance with applicable General Plan and Belmont Village Specific Plan goals, policies, and actions, project related VMT and transportation impacts would be further reduced below the levels analyzed in this section. Therefore, the project would not conflict with *CEQA Guidelines* Section 15064.3(b) and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required to mitigate impacts related to VMT. However, projects would be subject to relevant mitigation measures from the 2035 General Plan EIR and applicable provisions of the BMC.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?
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Impact TRA-3 THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS BECAUSE OF A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Improvements to the transportation and circulation system in the vicinity of Draft Housing Opportunity Sites and the City more broadly would be implemented over time. 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. For example, any modifications to public rights-of-way would be required to be consistent with appropriate regulations and design standards set forth by the City's applicable plans, programs and policies such as Belmont Code of Ordinances Article VII, Use of Public Rights-of-Way, Section 22.94 which establishes the requirement to obtain a right-of-way agreement from the City prior to placing, constructing, owning, controlling, or otherwise using any facility in, upon, above, beneath, or around any public right-of-way. Projects that would include the development of new streets, circulation improvements and access points would be reviewed for compliance with safety guidelines and standards as part of the development review process. Safety considerations include maintenance of a substantially clear line of sight at driveways between the driver of a vehicle waiting to enter the through street and the driver of an approaching vehicle. Each development project would be reviewed by the City and required to be consistent with appropriate regulations and design standards set forth by the General Plan and Belmont Village Specific Plan. Specifically, policies and actions such as General Plan Goal 3.4 and Policies 3.4-1, 3.5-3, and 3.5-8 which encourage safe and convenient modes of transportation including walking and biking would ensure connectivity. Belmont Village Specific Plan Goal 3.1 and Policies 3.1-2 and 3.2-10 which encourage complete street transportation infrastructure for all modes of transportation would additionally ensure safe transportation for various modes of transportation. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold:	Would the project result in inadequate emergency access?
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Impact TRA-4 THE PROJECT WOULD NOT HAVE THE POTENTIAL TO RESULT IN INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.12, *Population and Housing*, the project would result in an increase in population and development. Development facilitated by the project would be required to meet all

applicable current State and local codes and ordinances related to fire protection which would include emergency access.

As mentioned in Section 4.13, *Public Services and Recreation*, all of the Draft Housing Opportunity Sites are within 1.5 miles of a fire station. Therefore, the Draft Housing Opportunity Sites would be adequately served in case of a fire-related emergency. Development facilitated by the project would be required to provide adequate accommodation of fire access to structure frontages and, depending on the size of the development, multiple access points to development on the Draft Housing Opportunity Sites, pursuant to 2019 California Building Code requirements. Development that would not meet required standards and codes would not be allowed to be permitted by the City. Development facilitated by the project would be required to comply with City and County standards and requirements and would undergo review by public safety officials as part of the approval process. Safety, Fire, and Building Codes would be adhered to for all proposed development included in the project.

Emergency vehicle response times would continue to be reduced due to the ability of emergency vehicles to use vehicle preemption technology (where possible) and sirens; this capability would remain regardless of any roadway capacity modification. Roadway segments that would experience a reduction in vehicular roadway capacity, if any, would undergo individual operations analyses to assess the potential impacts to emergency vehicle access, and mitigation measures would be developed as needed to reduce potentially significant impacts to less than significant levels. Therefore, there would be adequate emergency service and access to the Draft Housing Opportunity Sites and the project would have a less than significant impact on emergency access.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

This impact would be less than significant without mitigation.

4.14.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative transportation impacts is the City of Belmont. Adjacent development considered part of the cumulative analysis includes buildout of the City General Plan.

Impact TRA-1 analyzes the project's compatibility with programs, plans, ordinances, and policies related to the circulation system. Cumulative development projects, like the proposed project, would be required to comply with local regulations and policies. The project's incremental contribution to cumulative impacts would be less than significant.

As described above in Impact TRA-2, the proposed project would result in less than significant impacts related to VMT.

OPR provides the following guidance regarding cumulative impacts analysis and VMT:

When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa (OPR 2018).

Because the analysis for the project was based on VMT per capita, the less than significant impact finding for Impact TRA-2 implies that the project would not have a cumulatively considerable contribution to a significant cumulative impact. Since project-level significance thresholds were designed to support long-term environmental goals, they inherently also address potential cumulative VMT impacts.

As described in Impact TRA-3, any modifications to public rights-of-way would be consistent with appropriate regulations and design standards set forth by the City's applicable plans, programs, and policies. Similarly, cumulative development projects would also be required to comply with the City's regulations and policies, and the project's incremental contribution to cumulative impacts would be less than significant.

Impact TRA-4 discusses potential impacts from inadequate emergency access. As stated therein, the project would be required to meet all applicable state and local codes and ordinances related to fire protection, including emergency access. Similarly, cumulative development projects would also be required to comply with local and statewide regulations, and the project's incremental contribution to cumulative impacts would be less than significant.

4.15 Tribal Cultural Resources

This section analyzes potential impacts related to tribal cultural resources (TCR) associated with the implementation of the proposed project. Potential impacts to archaeological and historical resources are addressed in Section 4.4, *Cultural Resources* and potential impacts to paleontological resources are addressed in Section 4.6, *Geology and Soils*.

4.15.1 Setting

a. Ethnographic Overview

The City of Belmont lies within an area traditionally occupied by the Ohlone (or Costanoan) people. Ohlone territory extends along the California coast from the point where the San Joaquin and Sacramento Rivers merge into the San Francisco Bay to Point Sur. Their inland boundary was limited to the interior Coast Ranges (Kroeber 1925:462). The Ohlone language belongs to the Penutian family, with several distinct dialects throughout the region (Kroeber 1925:462). It is divided into eight regional dialects: Karkin, Chochenyo, Ramaytush, Awaswas, Taymen, Mutsun, Rumsen, and Chalon (Jones 2015).

The pre-contact Ohlone were semi-sedentary, with a settlement system characterized by base camps and seasonal reserve camps composed of tule reed houses with thatched roofs made of matted grass (Schick 1994; Skowronek 1998). Just outside base camps, large sweat houses were built into the ground near stream banks used for spiritual ceremonies and possibly hygiene (Schick 1994, Jones 2015). Villages were divided into small polities, each of which was governed by a chief responsible for settling disputes, acting as a war leader during times of conflict, and supervising economic and ceremonial activities (Skowronek 1998; Kroeber 1925:468). Social organization appeared flexible to ethnographers and any sort of social hierarchy was not apparent to mission priests (Skowronek 1998).

Archaeological investigations have informed on Ohlone mortuary rituals. Cemeteries were set away from villages and visited during the annual Mourning Anniversary (Leventhal and DiGiuseppe 2009). Ceremonial human grave offerings might include *Olivella* beads, as well as tools like drills, mortars, pestles, hammerstones, bone awls, and utilized flakes (Leventhal and DiGiuseppe 2009). Ohlone mythology included animal characterization and animism, which was the basis for several creation narratives. Ritually burying of animals, such as a wolf, squirrel, deer, mountain lion, gray fox, elk, badger, grizzly bear, blue goose, and bat ray, was commonly practiced. Similar to human burials, ceremonial offerings were added to ritual animal graves like shell beads, ornaments, and exotic goods (Kroeber 1925; Field and Leventhal 2003; Jones 2010).

Ohlone subsistence strategies were based on hunting, gathering, and fishing (Kroeber 1925:467, Skowronek 1998). Larger animals, like bears, might be avoided, but smaller game was hunted and snared on a regular basis (Schick 1994:17). Like much of California, the acorn was an important staple and was prepared by leaching acorn meal in openwork baskets and in holes dug into the sand (Kroeber 1925:467). The Ohlone also practiced controlled burning to facilitate plant growth (Kroeber 1925:467, Skowronek 1998). During specific seasons or in times of drought, the reserve camps would be utilized for gathering seasonal food and accessing food storage (Schick 1994). Fishing would be done with nets and gorge hooks out of tule reed canoes (Schick 1994:16-17). Mussels were a particularly important food resource. Sea mammals such as sea lions and seals were hunted, and beached whales were exploited (Kroeber 1925:467).

Seven Franciscan missions were built within Ohlone territory in the late 1700s, and all members of the Ohlone group were eventually brought into the mission system (Kroeber 1925:462, Skowronek 1998). After the establishment of the missions, Ohlone population dwindled from roughly 10,000 people in 1770 to 1,300 by 1814 (Skowronek 1998). In 1973, the population of people with Ohlone descent was estimated at fewer than 300. The descendants of the Ohlone united in 1971 and have since arranged political and cultural organizations to revitalize aspects of their culture (Skowronek 1998).

4.15.2 Regulatory Setting

State Regulations

Assembly Bill 52

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, “tribal cultural resources.” Assembly Bill 52 establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21084.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and meets either of the following criteria:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k)
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

AB 52 also establishes a formal consultation process for California Native American Tribes regarding those resources. The formal consultation process must be completed before a CEQA document can be released if a California Native American Tribe traditionally and culturally affiliated with the geographic area of the proposed project requests consultation from the lead agency (PRC Section 21080.3.1). California Native American Tribes to be included in the process are those that have requested notice of any proposed projects within the jurisdiction of the lead agency.

Senate Bill 18

Enacted on March 1, 2005, Senate Bill 18 (SB 18) (California Government Code Section 65352.3 and 65352.4) requires cities and counties to notify and consult with California Native American tribal groups and individuals regarding proposed local land use planning decisions for the purpose of protecting traditional tribal cultural places (sacred sites), prior to adopting or amending a general plan or designating land as open space. Tribal groups or individuals have 90 days to request consultation following the initial contact.

Regional and Local Regulations

City of Belmont 2035 General Plan Goals, Policies, and Actions

Adopted in 2017, the City's existing General Plan identifies outlines policies for enhancing protection of archaeological and built-environment historical resources in the context of growth and change under the General Plan. Chapter 5, Conservation Element implemented the following goal, policies, and actions to preserve archaeological resources.

Goal 5.12 Preserve and protect areas and sites of prehistoric, cultural, and archaeological significance.

Policy 5.12-1: Ensure that development avoids potential impacts to sites suspected of being archeologically, paleontologically, or culturally significant, tribal or otherwise, or of concern by requiring appropriate and feasible mitigation.

Action 5.12-1a: Establish guidelines and mitigation programs when sites of archaeological, paleontological, and/or cultural concern, tribal or otherwise, would be disturbed by development, including:

- Requiring a records review for development proposed in areas that are considered archaeologically or paleontologically sensitive;
- Determining the potential effects of development and construction on archaeological or paleontological resources (as required by CEQA);
- Requiring pre-construction surveys and monitoring during any ground disturbance for all development in areas of historical and archaeological sensitivity; and,
- Implementing appropriate measures to avoid the identified impacts, as conditions of project approval.

Policy 5.12-2: If cultural, archaeological, paleontological, or cultural resources, tribal or otherwise, are discovered during construction, grading activity in the immediate area shall cease and materials and their surroundings shall not be altered or collected until evaluation by a qualified professional is completed.

- A qualified archaeologist or paleontologist must make an immediate evaluation and avoidance measures or appropriate mitigation should be completed, according to *CEQA Guidelines*.
- Use the State Office of Historic Preservation's recommendations for the preparation of Archaeological Resource Management Reports as guidelines.

4.15.3 Impact Analysis

This section describes what the potential impacts to tribal cultural resources are for this project and the mitigation measures required to bring those impacts to a less than significant threshold.

The significance thresholds used in this analysis are based on Appendix G of the *CEQA Guidelines*. For the purposes of this EIR, a significant impact would occur if implementation of the proposed project would result in any of the following conditions:

1. Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5

2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5
3. Disturb any human remains, including those interred outside of dedicated cemeteries

Threshold:	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: <ol style="list-style-type: none">a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), orb. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.
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Impact TCR-1 THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF POTENTIAL DEMOLITION, ALLOWED GROUND DISTURBANCE OR LOCATION OF DEVELOPMENT. THEREFORE, THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. The rezoning under the project would increase allowable building height to a maximum of 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*. This increase in height could result in a need for deeper foundations and more site excavation during construction to support the taller buildings. However, this would not encourage ground disturbance beyond the areas already identified as potential Draft Housing Opportunity Sites. Therefore, the rezoning and height increase would not have a significant impact as the area would already be disturbed under current zoning for development. In addition, a number of federal, state, and local regulations protect these resources, including Belmont General Plan policies, including General Plan Policies 5.12-1 and 5.12-2. Policy 5.12-1 ensures that development avoids potential impacts to sites suspected of being archaeologically or culturally significant, tribal or otherwise, or of concern by requiring appropriate and feasible mitigation. Policy 5.12-1 ensures that development avoids potential impacts to sites suspected of being archaeologically or culturally significant, tribal or otherwise, or of concern by requiring appropriate and feasible mitigation. This policy requires cultural resources record searches in areas considered archaeologically sensitive, pre-construction surveying, monitoring of ground-disturbance, and the application of mitigation measures that ensure less-than-significant impacts to cultural resources. Policy 5.12-2 requires that, upon the unanticipated discovery of cultural resources, all construction activities must stop until a qualified archaeologist has accessed the discovery and determined the proper mitigation measure (if necessary) required to reduce impacts to a less-than-significant level.

On April 2, a letter was sent to the Native American Heritage Commission (NAHC) requesting a Sacred Lands File (SLF) Search and a current SB 18 Native American Contact List for the project vicinity. The response dated April 14, 2021, stated that the SLF check was negative. The NAHC

provided a list of eight tribal contacts with tribal connections to the project area. The City of Belmont sent letters via email to each tribal contact to determine if they had any knowledge of tribal cultural resources in the project vicinity or if they would like to request additional consultation with the City regarding the project. To date, the City has not received any responses for consultation under AB 52 or SB 18.

The policies and regulations mentioned above would continue to apply to development in Belmont and provide the same level of protection as they do under existing conditions. The project would not increase the likelihood for development that could affect tribal cultural resources, and with implementation of these General Plan policies, as well as compliance with federal, State, and local regulations, development facilitated by the project would have no impact.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.15.4 Cumulative Impacts

Development facilitated by the project, in conjunction with other nearby past, present, and reasonably foreseeable probable future projects in the region could adversely impact cultural resources. Development that is considered part of the cumulative analysis includes buildout of the City's General Plan. Cumulative development in the region would continue to disturb areas with the potential to contain tribal cultural resources. For other developments that would have significant impacts on tribal cultural resources, similar conditions described herein would be imposed on those other developments consistent with the requirements of CEQA, along with requirements to comply with all applicable laws and regulations governing said resources.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Under the project, rezoning would increase the allowable building height to a maximum of 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*; however, this would not create a ground disturbance that would be greater than what would be allowed under current zoning conditions. Existing policies and regulations would continue to apply to development in Belmont and provide the same level of protection as under existing conditions. Therefore, the project would not contribute to a cumulative impact on tribal cultural resources.

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4.16 Utilities and Service Systems

This section assesses impacts to utilities and service systems, including water, wastewater, stormwater, electricity, natural gas, telecommunications, and solid waste services, associated with the implementation of the proposed project.

4.16.1 Setting

a. Water Supply

Water supply to the City of Belmont is provided by the Mid-Peninsula Water District (MPWD), which provides service to the City of Belmont and portions of the cities of San Carlos, Redwood City, and 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). Water for the City of Belmont 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. MPWD does not currently have supplies of groundwater, surface water, stormwater, recycled water, or desalinated water (MPWD 2021). A discussion of surface water is in Section 4.9, *Hydrology and Water Quality*.

The MPWD is responsible for implementing an Urban Water Management Plan (UWMP). The current Draft 2020 UWMP includes an assessment of past and future water supplies and demands, evaluation of the future reliability of the region's water supplies over a 20-year planning horizon, and discussion of demand management measures (MPWD 2021). MPWD's contractual Supply Assurance from SFPUC is its Individual Supply Guarantee which is 3.891 million gallons per day (mgd) or 1,420 million gallons per year (MG/year). With the adoption of the Bay Delta Plan Amendment, Phase 1 (Bay Delta Plan, BDP) by the State Water Resources Control Board (SWRCB) in December of 2018, the SFPUC would need to develop alternative water supplies such that they would be in place to fill any potential gap in supply from the implementation of the BDP. Additionally, the SFPUC would be able to meet its legal and contractual obligations to its Wholesale Customers. With implementation of the BDP, the SFPUC would be able to meet MPWD's water demand through two consecutive dry years. However, in the third through fifth consecutive dry year, SFPUC's supply would only meet 55 percent of MPWD's forecasted demand. Without implementation of the BDP, SFPUC would be able to meet expected MPWD demand.

b. Wastewater

The existing wastewater system in Belmont city limits, exclusive of the HIA as discussed below, consists of approximately 85 miles of gravity sewer pipelines ranging in size from 6- to 27- inches in diameter. Over 80 percent of the City's wastewater system is comprised of 6-inch diameter vitrified¹ clay pipe. In addition, the sewer collection system consists of 11 wastewater pump stations and approximately five miles of force mains. 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. The SVCW treatment plant is located near the eastern side of Belmont, and serves all its member agencies, including West Bay Sanitary District, and the cities of Redwood City, San Carlos, and Belmont. On the southeastern border of the City, residential areas within the HIA convey

¹ Vitrified is defined as the conversion of an object into glass or a glasslike substance, typically by exposure to heat

wastewater to areas outside of the City (City of Belmont 2017). This residential area corresponds with Draft Housing Opportunity Sites 80, 83, 136, and 137.

The SVCW treatment plant has a designed capacity of 29 mgd (dry weather flows) and provides tertiary level treatment. Approximately 7.4 percent of the treated effluent is recycled and used in Redwood City and the remainder is discharged to the San Francisco Bay. The total of all wastewater flows to the SVCW for 2020 (January – December 2020) was 4,620 MG (average day: 12.62 mgd). The wastewater from MPWD's service area consists of approximately 97 percent flow from Belmont and approximately 3 percent flow from San Carlos. In 2020, based on SVCW's metering results, the wastewater from the City of Belmont was 521.8 MG/year (average day: 1.43 mgd). The wastewater from San Carlos was 17.5 MG/year (average day: 0.048 mgd), for a total of about 539.31 MG/year (1.47 mgd) from the MPWD service area. SVCW's projections for 2040, total dry weather wastewater flow, is 6,533.5 MG/year (17.9 mgd). SVCW's projections for future wastewater flows from the City of Belmont, indicate that sewage generation will increase slowly over the next 20 years, from 539.31 MG/year (1.47 mgd) in 2020 to 775.3 MG/year (2.12 mgd) in 2040 (MPWD 2021). The SVCW is currently undergoing capital improvement projects within its Capital Improvement Program (SVCW 2020). The City of Belmont Public Works Sewer Division is responsible for maintaining, replacing, and upgrading the City's sewer collection system (City of Belmont 2021a).

c. Stormwater

The City's storm drainage infrastructure consists of 28 miles of storm drain pipes and two storm pump stations. Four main drainage areas – Belmont Creek, Laurel Creek, O'Neil Slough and Island Park Belmont Creek – together collect about 80 percent of the storm runoff in the city, while the rest flows to the City of San Mateo and the City of San Carlos. Belmont Creek is the primary storm drainage conveyance of the city, conveying approximately 60 percent of the city's storm runoff. In addition, significant amounts of open space, particularly near Waterdog Lake, assists in absorption of rainwater that would otherwise drain through Belmont Creek (City of Belmont 2017).

The City complies with the Municipal Regional Stormwater Permit (MS4), issued by the Regional Water Quality Control Board in 2009, for its stormwater pollution protection. The MS4 requires local agencies in San Mateo County to incorporate stormwater controls in development projects, and provides specific guidelines on design measures, source controls, stormwater treatment measures, hydromodification management, and construction site controls. The City also implements a comprehensive storm water program as required by the Federal Clean Water Act. The program is designed to reach residents and businesses in the city with the overall goal of reducing storm water pollutants that enter the storm drain system and minimize potential water quality impacts to nearby creeks, sloughs and the bay (City of Belmont 2021b).

d. Solid Waste

The City of Belmont is a member of the South Bay Waste Management Authority (SBWMA), also known as Rethink Waste. As such, the city is served by Rethink Waste. In 2010, the City signed a franchise agreement, amended on November 9, 2021, with Recology of San Mateo County (Recology), which provides exclusive waste collection, waste reduction, recycling, and composting services. Residential and commercial solid waste collected by Recology, including recyclable and organic materials, is sent to Shoreway Environmental Center for processing and shipment. Shoreway Environmental Center is a regional recycling and transfer station owned by Rethink Waste and accepts waste from its member agencies (City of Belmont 2017).

Solid waste generated in Belmont is transported to and disposed of at the following landfills: Altamont Landfill & Resource Recover, Azusa Land Reclamation Company Landfill, Billy Wright Disposal Site, Corinda Los Trancos Landfill (Ox Mtn), Covanta Stanislaus, Incorporated, Guadalupe Sanitary Landfill, John Smith Road Landfill, Monterey Peninsula Landfill, Newby Island Sanitary Landfill, Potrero Hills Landfill, Recology Hay Road, Recology Ostrom Road LF Inc., Vasco Road Sanitary Landfill, and Zanker Material Processing Facility (California Department of Resources Recycling and Recovery [CalRecycle] 2019a). Table 4.16-1 provides the active solid waste disposal sites that would accept waste from construction and operation from development facilitated by the project, and the permitted and remaining capacities of each site.

Table 4.16-1 Solid Waste Disposal Operations

Solid Waste Disposal Operation	Total Permitted Capacity	Remaining Capacity	Expected Closure Year
Altamont Landfill & Resource Recovery	11,150 tpd 124,400,000 cy	65,400,000 cy	2070
Azusa Land Reclamation Co. Landfill	8,000 tpd 80,571,760 cy	51,512,201 cy	2045
Billy Wright Disposal Site	1,500 tpd 14,800,000 cy	11,370,000 cy	2054
Corinda Los Trancos Landfill (Ox Mtn)	3,598 tpd 60,500,000 cy	22,180,000 cy	2034
Covanta Stanislaus, Inc.	1,700 tpd 3,200 tpd	n/a	n/a
Guadalupe Sanitary Landfill	1,300 tpd 28,600,000 cy	11,055,000 cy	2048
John Smith Road Landfill	1,000 tpd 9,797,000 tpy	1,921,000 cy	2025
Monterey Peninsula Landfill	3,500 tpd 49,700,000 cy	48,560,000 cy	2107
Newby Island Sanitary Landfill	4,000 tpd 57,500,000 cy	21,200,000 cy	2041
Potrero Hills Landfill	4,330 tpd 83,100,000 cy	13,872,000 cy	2048
Recology Hay Road	2,400 tpd 37,000,000 cy	30,433,000 cy	2077
Recology Ostrom Road LF Inc.	3,000 tpd 43,467,231 cy	39,223,000 cy	2066
Vasco Road Sanitary Landfill	2,518 tpd 32,97,000 cy	7,379,000 cy	2051 ¹
Zanker Material Processing Facility	350 tpd 640,000 cy	640,000 cy	2025

Notes: tpd = tons per day; cy = cubic yards

¹ The Vasco Road Sanitary Landfill is currently undergoing environmental review to increase its permitted height and refuse volume allowance that would extend its closure date to 2051.

Source: CalRecycle 2021a

e. Telecommunications, Electricity, and Natural Gas

Telecommunications services in Belmont are provided by private companies, including AT&T and Comcast Cable. The telecommunications provider used by residents and businesses in Belmont is subject to the user's discretion. Telecommunications facilities are generally available throughout the City.

Two electricity providers serve the City of Belmont: Peninsula Clean Energy (PCE) and Pacific Gas and Electric Company (PG&E). PG&E is also the natural gas provider for the City. Natural gas and electricity are also addressed in Section 4.5, *Energy*. PCE provides clean energy that is 100 percent carbon free, either sourced entirely from renewable energy (50 percent solar and 50 percent wind) or 52.2 percent renewable (including biomass and waste, geothermal, small hydroelectric, solar, and wind). PCE aims to provide only 100 percent renewable by 2025 (PCE 2021). In conjunction with the utility companies, the California Public Utilities Commission (CPUC) regulates energy conservation programs.

4.16.2 Regulatory Setting

The regulatory setting for utilities is provided below, organized by the topics addressed in this section, including water supply; wastewater; stormwater; solid waste; telecommunications, electricity, and natural gas.

a. Water Supply

Federal Regulations

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law that regulates water quality in the United States. It forms the basis for several State and local laws throughout the country. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the U.S. Environmental Protection Agency and USACE. At the state and regional levels in California, the act is administered and enforced by the SWRCB and the nine Regional Water Quality Control Boards (RWQCB).

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems (PWS) that supply drinking water. 42 United States Code Section 300(f) et seq.; 40 Code of Federal Regulations (CFR) Section 141 et seq. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable
2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
4. Regulate distribution systems

State

California Safe Drinking Water Act

The California SDWA (Health & Safety Code Section 116270 et seq.; 22 Cal. Code Regs. Section 64400 et seq.) regulates drinking water more rigorously than the federal law. Like the Federal SDWA, California requires that primary and secondary maximum contaminant levels be established for pollutants in drinking water; however, some California maximum contaminant levels are more protective of health. The Act also requires the SWRCB to issue domestic water supply permits to public water systems.

Implementation of the federal SDWA is delegated to the State of California. The SWRCB enforces the federal and state SDWAs and regulates more than 7,500 PWSs across the state. The SWRCB's Division of Drinking Water oversees the State's comprehensive Drinking Water Program. The Drinking Water Program is the agency authorized to issue PWS permits.

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the DWR. Please refer to Section 4.9, *Hydrology and Water Quality*, for more detailed descriptions of the groundwater basins underlying the Draft Housing Opportunity Sites.

California Plumbing Code

The California Plumbing Code is codified in Title 24, California Code of Regulations, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (SB 407 [2009] Civil Code Sections 1101.1 et seq.).

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. Every five years, water suppliers are required to develop Urban Water Management Plans to identify short-term and long-term water demand management measures to meet growing water demands.

Local

City of Belmont General Plan

The City of Belmont 2035 General Plan was adopted November 2017 and is the primary mechanism for guiding future population growth and development in the City of Belmont and provides a guide for land use decision making. The General Plan's Conservation Element includes the following goals and policies applicable to water resources:

Goal 5.6 Preserve water resources and provide for long-range community water needs by adopting best management practices for water use and conservation.

Policy 5.6-1: Work with the Mid-Peninsula Water District to meet State targets for reducing per capita urban water use.

Policy 5.6-2: Support the Mid-Peninsula Water District in advocating for reliable and fairly priced water from the San Francisco regional water system.

Policy 5.6-3: Encourage the Mid-Peninsula Water District to continue and expand its water conservation programs.

Policy 5.6-4: Set appropriate conditions of approval for each new development proposal to ensure that the necessary water supply facilities and water resources are in place prior to occupancy.

Policy 5.6-5: Continue the City's Water Conservation Strategy to reduce water use, control water cost, and promote environmental sustainability in municipal buildings, parks, landscaped areas, and athletic fields, as feasible and appropriate

b. Wastewater

Federal

Federal Clean Water Act

The federal Clean Water Act is described in Section 4.16.2, *Water Supply*.

State and Regional

Standards for wastewater treatment plant effluent are established using State and federal water quality regulations. After treatment, wastewater effluent is either disposed of or reused as recycled water. The RWQCBs set the specific requirements for community and individual wastewater treatment and disposal and reuse facilities through the issuance of Waste Discharge Requirements, required for wastewater treatment facilities under the California Water Code Section 13260.

The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered by the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Local

City of Belmont General Plan

The General Plan's Conservation Element includes the following goals and policies applicable to wastewater:

Goal 5.7 Provide adequate wastewater collection, treatment, recycling and disposal facilities in a timely fashion to serve existing and future needs.

Policy 5.7-1: Continue to make improvements and upgrades to the wastewater system, consistent with the City's Sanitary Sewer System Capacity Analysis and the Silicon Valley Clean Water Conveyance System Master Plan.

Action 5.7-1a: Identify the improvements and upgrades that are necessary to improve and maintain the sewer infrastructure to serve the City's long-term needs and prioritize funding to complete the improvement projects.

Policy 5.7-2: Periodically review and update development impact fees, wastewater connection charges, and monthly service charges to ensure that adequate funds are collected to operate and maintain existing facilities and to construct new facilities.

Policy 5.7-3: Partner with Silicon Valley Clean Water to develop and implement a local purified/recycled water (treated wastewater) program for Belmont, as technology and infrastructure allow.

Action 5.7-3a: Establish a program to reduce water use in municipal buildings and allow use of recycled water in buildings and irrigation, as feasible and appropriate.

Action 5.7-3b: As it becomes available and cost-effective, encourage and consider providing incentives for, as appropriate, potential future customers to retrofit their water systems to utilize recycled water as part of Belmont's treated wastewater program.

c. Stormwater

Federal, State, and local regulations pertaining to stormwater management, drainage, flooding, and water quality are discussed in Section 4.9, *Hydrology and Water Quality*.

d. Solid Waste

Federal

Title 40 of the Code of Federal Regulations

Title 40 of the CFR, Part 258 (Resource Conservation and Recovery Act, Subtitle D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the Federal landfill criteria.

State

PRC Chapter 476 (Assembly Bill 341) and PRC Chapter 295 (Senate Bill 1383)

The purpose of Assembly Bill (AB) 341 of 2011 (PRC Chapter 476, Statutes of 2011) is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for

additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

SB 1383 of 2016 (PRC Chapter 395, Statutes of 2016) established the following goals: a 50-percent reduction in the level of the statewide disposal of organic waste from 2014 levels by 2020, and a 75-percent reduction in the level of the statewide disposal of organic waste from 2014 levels by 2025. This bill also authorized CalRecycle to adopt regulations, to take effect on or after January 1, 2022, to achieve these targets.

PRC 41780 (Assembly Bill 939)

AB 939 (PRC 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare source reduction and recycling elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

PRC Chapter 727 (Assembly Bill 1826)

AB 1826 of 2014 (PRC Chapter 727, Statutes of 2014) requires businesses that generate a specified amount of organic waste per week to arrange for recycling services for that waste, and that jurisdictions implement a recycling program to divert organic waste from businesses subject to the law. The jurisdictions must report to CalRecycle on their progress in implementing an organic waste recycling program. As of January 1, 2017, businesses that generate four cubic yards or more of organic waste per week shall arrange for organic waste recycling services.

PRC Chapter 343 (Senate Bill 1016)

SB 1016 of 2007 (PRC Chapter 343, Statutes of 2007) requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Since January 1, 2018, the Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Local

City of Belmont General Plan

The General Plan's Conservation Element includes the following goals and policies applicable to solid waste:

Goal 5.8 Provide adequate solid waste facilities and services for the collection, transfer, recycling, and disposal of refuse.

Policy 5.8-1: Promote solid waste reduction, recycling, and composting to Belmont residents and businesses as an important way to conserve limited natural resources and reduce greenhouse gas emissions.

Policy 5.8-2: Solicit the use of recycled products in City procurement documents.

e. Electric Power and Natural Gas

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2021).

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2021a).

Additional regulations and policies pertaining to electric power are discussed in Section 4.5, *Energy*.

f. Telecommunication

The CPUC develops and implements policies for the telecommunication industry. The Communications Division is responsible for licensing, registration and the processing tariffs of local exchange carriers, competitive local carriers, and non-dominant interexchange carriers. It is also responsible for registration of wireless service providers and franchising of video service providers. The Division tracks compliance with commission decisions and monitors consumer protection and service issues and Commission reliability standards for safe and adequate service. The Communications Division is responsible for oversight and implementation of the six public purpose Universal Service Programs (CPUC 2021b).

4.16.3 Impact Analysis

a. Methodology and Significance Thresholds

The following thresholds are based on CEQA Guidelines Appendix G. For purposes of this EIR, impacts related to water supplies, wastewater, solid waste, or storm water conveyance are considered significant if implementation of the proposed project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects
2. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the projects' projected demand in addition to the provider's existing commitments
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals

5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste

b. Project Impacts and Mitigation Measures

Threshold:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
Threshold:	Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
Threshold:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-1 DEVELOPMENT FACILITATED BY THE PROJECT MAY REQUIRE THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT, STORMWATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS FACILITIES WITHIN THE CITY. WHILE NEW CONNECTIONS TO EXISTING UTILITY SERVICE SYSTEMS WOULD BE REQUIRED, SUCH CONNECTIONS WOULD NOT RESULT IN DISTURBANCE BEYOND INDIVIDUAL DEVELOPMENT SITES AND ADJACENT INFRASTRUCTURE CORRIDORS AND WOULD NOT RESULT IN SIGNIFICANT ENVIRONMENTAL EFFECTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Water

The City of Belmont is served by existing MPWD potable water facilities, including sites located within the Harbor Industrial Area to be annexed. Development facilitated by the project may require the installation of additional water main lines, lateral connections, and hydrants within the city. Such facilities would be installed during individual project construction and within the disturbance area of such projects or the rights-of-way of previously disturbed roadways; therefore, the construction of these infrastructure improvements would not substantially increase the project's disturbance area or otherwise cause significant environmental effects beyond those already identified throughout this EIR.

In 2020, MPWD's total service population was 27,560, of which 93 percent of MPWD's connections were residential services while 7 percent were commercial, institutional, and industrial (MPWD 2021). The MPWD UWMP projects Belmont's population to be 32,912 by 2045 which is accounted for in the analysis of water management within the UWMP. As discussed in Section 4.12, *Population and Housing*, the project would result in a population of 34,533 by the year 2031. Accordingly, the estimated population increase would exceed the projected population increase within the MPWD UWMP by approximately 5 percent. MPWD presents water supply and demand comparison scenarios for normal year supply and demand and single dry year without implementation of the BDP and with implementation of the BDP, and multiple dry year conditions without implementation of the BDP and with implementation of the BDP. Table 4.16-2 through Table 4.16-6 show the MPWD UWMP water demand and supply projections from 2020 to 2045 (MPWD 2021).

Table 4.16-2 Normal Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals	1,044	1,037	1,051	1,055	1,069
Demand Totals	1,044	1,037	1,051	1,055	1,069
Difference	0	0	0	0	0

Notes: Units are presented in million gallons (MG) per calendar year.

For "Normal year" SFPUC supply uses projected Wholesale customer demands. MPWD's Supply Assurance (ISG) from SFPUC is 3.891 MGD, or 1420 MG per year.

Source: MPWD 2021

Table 4.16-3 Single Dry Year Supply and Demand Comparison with BDP

	2025	2030	2035	2040	2045
Supply Totals	668	661	668	672	580
Demand Totals	1,044	1,037	1,051	1,055	1,069
Difference	-376	-376	-383	-383	-489

Notes: Units are presented in million gallons (MG) per calendar year.

Source: MPWD 2021

Table 4.16-4 Single Dry Year Supply and Demand Comparison without BDP

	2025	2030	2035	2040	2045
Supply Totals	1,044	1,037	1,051	1,055	1,069
Demand Totals	1,044	1,037	1,051	1,055	1,069
Difference	0	0	0	0	0

Notes: Units are presented in million gallons (MG) per calendar year.

Source: MPWD 2021

Table 4.16-5 Multiple Dry Years Supply and Demand Comparison with BDP

		2025	2030	2035	2040	2045
First Year	Supply Totals	668	661	668	672	580
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	-376	-376	-383	-383	-489
Second Year	Supply Totals	573	566	573	577	580
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	-471	-471	-478	-478	-489
Third Year	Supply Totals	573	566	573	577	580
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	-471	-471	-478	-478	-489
Fourth Year	Supply Totals	573	566	573	507	496
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	-471	-471	-478	-548	-573

		2025	2030	2035	2040	2045
Fifth Year	Supply Totals	573	566	526	507	496
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	-471	-471	-526	-548	-573

Notes: Units are presented in million gallons (MG) per calendar year.

Source: MPWD 2021

Table 4.16-6 Multiple Dry Years Supply and Demand Comparison without BDP

		2025	2030	2035	2040	2045
First Year	Supply Totals	1,044	1,037	1,051	1,055	1,069
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	0	0	0	0	0
Second Year	Supply Totals	1,044	1,037	1,051	1,055	1,069
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	0	0	0	0	0
Third Year	Supply Totals	1,044	1,037	1,051	1,055	1,069
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	0	0	0	0	0
Fourth Year	Supply Totals	1,044	1,037	1,051	1,055	960
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	0	0	0	0	-110
Fifth Year	Supply Totals	1,044	1,037	1,051	1,055	960
	Demand Totals	1,044	1,037	1,051	1,055	1,069
	Difference	0	0	0	0	-110

Notes: Units are presented in million gallons (MG) per calendar year.

Source: MPWD 2021

Regardless of implementation of the BDP, current water supplies could potentially be insufficient to meet demand from the project's estimated population of 34,533 as projections used in the MPWD UWMP are approximately 5 percent lower than the estimated population. The California Code of Regulations Title 24, Part 11 (CALGreen) requires a 20 percent reduction in residential indoor water use that would lower potential water demand. MPWD's service area gross water use in 2020 was reported as 974 MG. According to the MPWD UWMP, the MPWD service area has a water reduction goal of 121 gallons per capita per day (GPCD) by 2020, and in 2020 the MPWD reported its GPCD was 97 GPCD which met the targeted 121 GPCD. Based on the increase of approximately 5 percent from the projected population in the MPWD UWMP, estimated GPCD with implementation of the project would be 102 GPCD which would still be well below the targeted 121 GPCD. Compliance with General Plan Policies 5.6-1, 5.6-3, and 5.6-5 would expand water conservation programs and reduce per capita water use. Further, compliance with Climate Action Plan measures EW1 and EW2 would further reduce water use through the promotion of water efficiency and conservation. Therefore, while the development facilitated by the project would result in additional population beyond the projected population within the MPWD UWMP, compliance with General Plan policies and Climate Action Plan measures would reduce per capita water use and would be within the targeted 121 GPCD. Therefore, the project would not result in construction or relocation of water

facilities such that significant environmental impacts would result. Impacts would be less than significant.

Wastewater

Development facilitated by the project may require the installation of upsized sewer lines and additional lateral connections within the city. As with water facilities, sewer laterals and main extensions necessary to serve the future development would generally be installed within the already disturbed rights-of-way of existing roads or within the disturbance footprints of such projects. As such, the construction of these infrastructure improvements would not substantially increase the project's disturbance area or otherwise cause significant environmental effects beyond those identified throughout this EIR. Furthermore, implementation of proposed capital improvement projects for the SVCW treatment plant would ensure adequate capacity to serve projected demand from development facilitated by the project in addition to the provider's existing commitments.

According to the 2020 MPWD UWMP, Belmont's 2020 sewage generation was 539.31 MG/year (1.47mgd) and is expected to increase to 775.3 MG/year (2.12 mgd) in 2040. Based on the 5 percent increase in population from development facilitated by the project, sewage generation would be expected to increase to approximately 814 MG/year (2.23 mgd) which would be approximately 8 percent of the SVCW treatment plant daily capacity. Therefore, the SCVW would have sufficient capacity to accommodate wastewater generated by the proposed project.

Applicants for development facilitated by the proposed project would be responsible for constructing on-site wastewater treatment conveyance systems and paying standard sewer connection fees, as necessary. Development facilitated by the project would also be required to comply with Goal 5.7, Policies 5.7-1, 5.7-2, and 5.7-3, and action 5.7-1a and actions 5.7-3a and 5.7-3b, which would require such actions as improving and upgrading the city wastewater system and providing adequate wastewater collection, treatment, recycling, and disposal to serve existing and future needs.

Therefore, the project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects beyond those already identified throughout this EIR. Impacts would be less than significant.

Stormwater

Impacts regarding stormwater drainage facilities are discussed in Section 4.9, *Hydrology and Water Quality*.

Electricity and Natural Gas

The project would require connections to existing electrical transmission and distribution systems on site to serve development facilitated by the project. This service would be provided in accordance with the rules and regulations of PG&E and PCE on file with and approved by CPUC. Based on the availability of existing electrical infrastructure, it is not anticipated that the construction of new electrical transmission and distribution lines would be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate electrical facilities to serve development facilitated by the project and impacts related to electricity would be less than significant.

Development facilitated by the project would connect to existing natural gas infrastructure to meet the needs of site residents and tenants. Based on the availability of existing natural gas infrastructure, construction of new natural gas pipelines would not be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate natural gas facilities to serve the development facilitated by the project and impacts related to natural gas would be less than significant.

Telecommunications

Project implementation would require connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. Development facilitated by the project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the development facilitated by the project and impacts related to telecommunications would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS, OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE. THE PROJECT WOULD NOT IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS AND WOULD COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Development facilitated by the project could result in the addition of up to 8,250 residents and 3,300 residential units throughout the city. Based on a solid waste generation rate of 5.31 pounds per dwelling unit per year (CalRecycle 2019b), the proposed project would generate an estimated 17,523 pounds per day (approximately 9 tons or 21 cubic yards²) or about 6.4 million pounds per year (3,197 tons). According to CalRecycle, the remaining capacity of the Altamont Landfill & Resource Recovery is 65.4 million cubic yards (55.1 million tons) and is projected to reach its maximum capacity in year 2070 (CalRecycle 2019a). The project would yield an annual solid waste generation of approximately 3,197 tons per year. This would account for less than approximately 0.01 percent of the remaining capacity of the Altamont Landfill & Resource Recovery. Therefore,

² Household trash is approximately 800 pounds per cubic yard (CalRecycle 2021b).

development facilitated by the project would not generate solid waste in excess of the capacity of local solid waste infrastructure.

Policies in the City of Belmont General Plan address solid waste generation and disposal at residential properties. Development facilitated by the project would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. AB 939 requires the City to divert 50 percent of solid waste from landfills. Local infrastructure would have the capacity to accommodate solid waste generated by the project. Development facilitated by the project would also be required to demonstrate compliance with all applicable regulations. The project's solid waste disposal would have a less than significant impact for local solid waste infrastructure.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.16.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]).

Water

The geographic scope for cumulative water supply impacts is the water district service area. This would include Belmont, portions of San Carlos, and portions of unincorporated San Mateo County. This geographic scope is appropriate because MPWD is responsible for supplying potable water to all residential, commercial, industrial, and fire protection uses within its service area. Development considered part of the cumulative analysis includes buildout of the City of Belmont's General Plan and other local General Plans.

Cumulative development within the MPWD service area will continue to increase demands on water supplies. There would be sufficient existing water supplies to accommodate anticipated cumulative development and achieve full buildout of the Draft Housing Opportunity Sites under normal and dry year conditions but does not anticipate excess supply. With augmentation from multiple supply sources from alternative water supplies, SFPUC would meet projected water demands to wholesale customers (including MPWD). Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact regarding water supply services.

Wastewater

The geographic scope for cumulative wastewater impacts includes SVCW's service territory, because wastewater conveyance and treatment throughout the City is conducted by SVCW. As discussed above under Impact UTIL-1, new wastewater service connections would be installed as needed, on a project-specific basis; this would occur for non-residential developments within the cumulative scenario as it would for residential developments under the proposed project. SVCW and the City of Belmont conduct repairs and upgrades to the existing wastewater conveyance system throughout

the city on an as-needed basis, and would continue to do so for both residential developments under the proposed project as well as non-residential projects in the cumulative scenario.

Additionally, with the implementation of proposed capital improvement projects for the SVCW treatment plant, development facilitated by the project would be within the SVCW treatment plant available capacity. Therefore, potential cumulative impacts associated with water conveyance and treatment would be less than significant.

Electricity and Natural Gas

The geographic scope for cumulative electricity and natural gas impacts is the PG&E and PCE service area. This geographic scope is appropriate because the local providers, PG&E and PCE are responsible for transmitting electricity (both companies) and natural gas (PG&E only) to all land uses within its service area, including the Draft Housing Opportunity Sites. Development considered part of the cumulative analysis includes buildout of local General Plans.

PG&E is subject to the requirements set forth and/or enforced by the CPUC. The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements, similar to those applicable to the project. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be less than significant. Therefore, the proposed project would not have a cumulatively considerable contribution to a cumulative impact regarding electricity and natural gas.

Telecommunication

The geographic scope for cumulative telecommunications impacts is the telecommunication provider service area. This geographic scope is appropriate because local providers are responsible to provide adequate telecommunication infrastructure to all land uses within its service area, including the Draft Housing Opportunity Sites. Development considered part of the cumulative analysis includes buildout of the City of Belmont General Plan.

As discussed above under Impact UTIL-1, project implementation requires connections to existing utility infrastructure to meet the needs of site residents and tenants. Cumulative development would increase demand for telecommunications infrastructure in the city. However, cumulative projects would each be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as the project. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant. The project would not have a cumulatively considerable contribution to a cumulative impact regarding telecommunication services.

Solid Waste

The geographic scope for cumulative solid waste impacts encompasses all areas in the city and County of San Mateo that contribute solid waste to the Altamont Landfill and Resource Recovery. This geographic scope is appropriate because, as the local provider, the Altamont Landfill and Resource Recovery is responsible for accepting solid waste from all land uses within its service area, including the Draft Housing Opportunity Sites. Development considered part of the cumulative analysis includes buildout of the City of Belmont General Plan and buildout of cities and unincorporated areas within San Mateo County that dispose of waste at the Altamont Landfill and Resource Recovery, which will continue to increase solid waste generation.

As discussed under Impact UTIL-2, the Altamont Landfill and Resource Recovery is projected to reach its maximum capacity in year 2070. Compliance with applicable solid waste regulations and with General Plan goals, objectives, and policies would maintain or improve upon diversion rates. Cumulative development in the city would be required to comply with requirements of AB 939 which requires a solid waste diversion rate of 50 percent. Thus, cumulative impacts to solid waste facilities would be less than significant.

The solid waste generated by development facilitated by the project would account for approximately 0.01 percent of the remaining capacity of the Altamont Landfill and Resource Recovery. Although development facilitated by the project would increase solid waste compared to existing conditions, the Altamont Landfill and Resource Recovery has sufficient capacity to accommodate it. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact regarding solid waste services.

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4.17 Wildfire

The analysis in this section addresses impacts related to wildfire risks and exposure associated with the implementation of the proposed project.

4.17.1 Setting

a. Overview of Wildfire

A wildfire is an uncontrolled fire in an extensive area of combustible vegetation. Wildfires differ from other fires in that they take place in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. Extreme wildfire events are expected to increase in frequency with the effects of increased global temperature, although changes in specific fire-prone areas are difficult to predict with any certainty (US Forest Service [USFS] 2021).

The Governor's Office of Planning and Research (OPR) has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. In general, increasing density decreases risk of wildfire. The risk of loss of human life, property, natural resources, or economic assets from wildfire is highest at the Wildland-Urban Interface (WUI), areas of urban development located adjacent to or even within wildland areas. Today approximately one-third of houses in California are within the WUI area (OPR 2020). It is important to note that there are varying definitions of what constitutes a WUI, and some local or regional agencies consider some areas to be WUI that are not defined as Wildland Interface or Intermix zones under the Wildland-Urban Interface Building Standards in Title 24, Part 2 of the California Code of Regulations (CCR); these standards are discussed under *Regulatory Setting* below.

The indirect effects of wildfires can be catastrophic. In addition to stripping the land of vegetation and destroying forest resources, large, intense fires can harm the soil, waterways, and the land itself. Soil exposed to intense heat may lose its capability to absorb moisture and support life. Exposed soils erode quickly and enhance siltation of rivers and streams, thereby enhancing flood potential, harming aquatic life, and degrading water quality. Lands stripped of vegetation are also subject to increased debris flow hazards.

Due to local topography, vegetation, and weather conditions, the Santa Cruz Mountains are conducive to large periodic wildfires. Historically the mountains would have burned on a decadal basis through a patchwork of burned and unburned areas. In more recent years, with fire suppression and inadequate forest management, fuel loads have increased throughout San Mateo County. There are 39 square miles of WUI in San Mateo County. At the last survey in 2010, there were 14,704 homes within the WUI in the County (FireSafe San Mateo 2020).

Although San Mateo County has not experienced a large number of severe wildfires in recent years, in 2020 the CZU Lightning Complex Fire burned 86,509 acres, destroyed 1,490 structures, claimed one life and was the seventh costliest wildfire in United States history (California Department of Forestry and Fire Protection [CAL FIRE] 2021a). The mountainous, highly combustible areas in the Santa Cruz Mountains and western San Mateo County have Fire Hazard Severity Zone (FHSZ) rankings of "very high" to "moderate," and the area immediately east of Interstate 280 has a FHSZ

ranking of “very high” (CAL FIRE 2007a) and, therefore, is highly susceptible to wildfires. Communities near this area include western Belmont, San Mateo, Redwood City, San Carlos, Emerald Lake Hills, Woodside, and Hillsborough. Figure 4.17-1 shows the Draft Housing Opportunity Sites relative to the nearby FHSZs.

Slope and Aspect

According to CAL FIRE, sloping land increases susceptibility to wildfire because fire typically burns faster up steep slopes, and they may hinder firefighting efforts (CAL FIRE 2007b). Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Aspect is the direction that a slope faces, and it determines how much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation and are warmer and drier than slopes facing a northerly to northeasterly direction, increasing the potential for wildfire ignition and spread (University of California 2018).

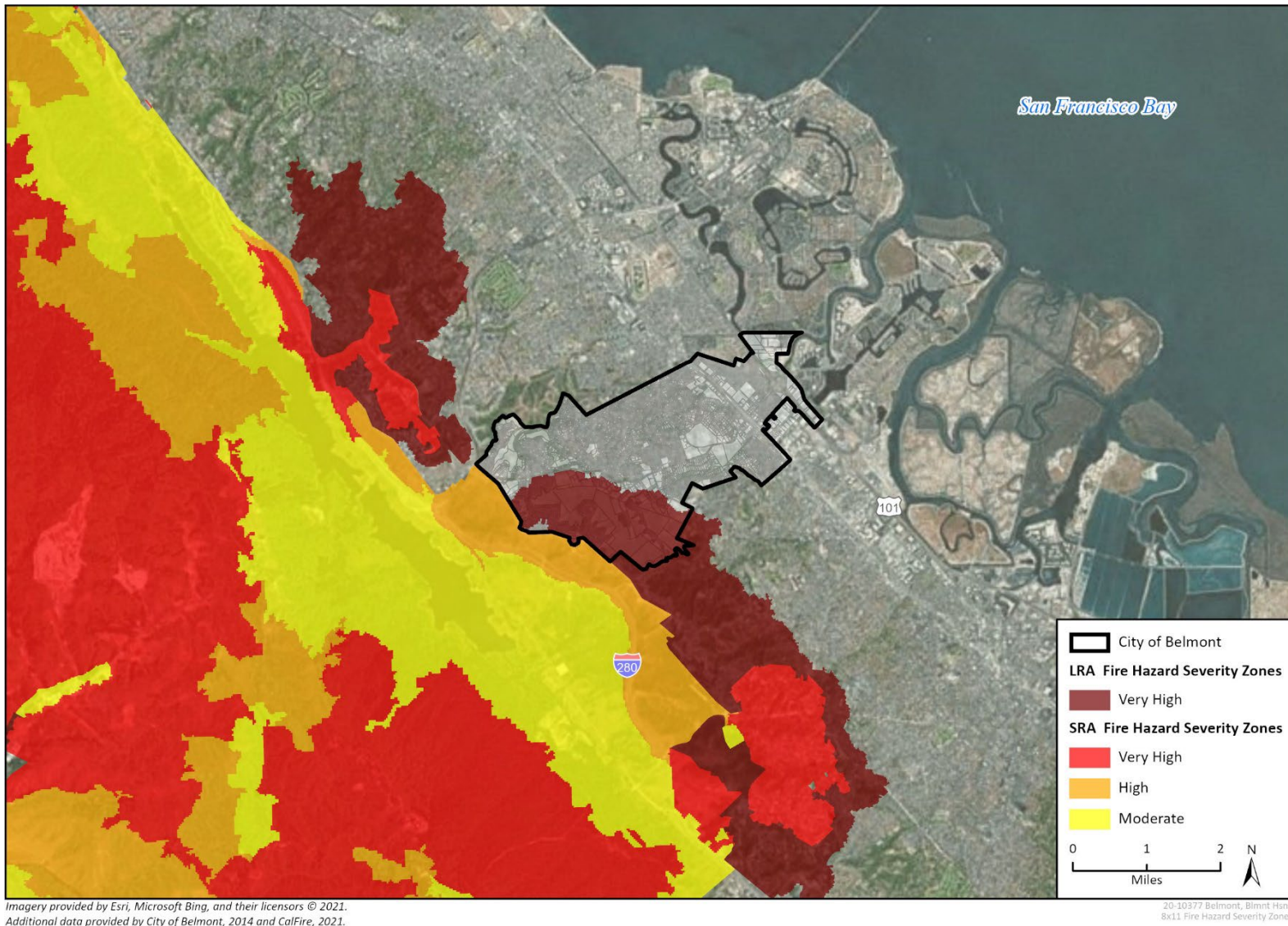
Large portions of western Belmont consists of hilly terrain. Developed hillsides along Belmont and Polhemus Creeks, Hallmark Drive, St. James Road, and the residential districts near San Juan Canyon and the Waterdog Lake Open Space all exist within the Belmont WUI Fire Hazard Area as defined by San Mateo County (San Mateo County 2003). The Draft Housing Opportunity Sites are located throughout the City of Belmont, with most located within the Belmont Village Specific Plan Area along El Camino Real or in the area between El Camino Real and the Highway 101 freeway. These opportunity sites are on flat, mostly developed terrain surrounded by freeways and major urban roads and not conducive to the spread of wildfire. The remaining Draft Housing Opportunity Sites are located within the Belmont WUI Fire Hazard Area and are located either on sloped hillsides or are near to sloped hillsides, including sites located near Sugarloaf Hill, around Monte Creste Drive, and near Arthur Avenue and Alameda de las Pulgas. Much of the existing development around the Draft Housing Opportunity Sites west of El Camino Real is located on south-facing hillsides, where wildfire risk is higher.

Vegetation

Vegetation is fuel to a wildfire, and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire resistant, while other vegetation is extremely flammable. Some plant types in California landscapes are fire resistant, while others are fire-dependent for their seed germination cycles.

Wildfire behavior depends on the type of fuels present, such as ladder fuels, surface fuels, and aerial fuels. Surface fuels include grasses, logs, and stumps low to the ground. Ladder fuels, such as tall shrubs, young trees, and the lowest branches of mature trees, provide a path for fire to climb upward into the crowns of trees. Aerial fuels include upper limbs, foliage, and branches not in contact with the ground. Ample spacing in between tree crowns and trimming of lower branches close to the ground is effective at preventing fire from either igniting the crown of a tree or spreading from an ignited tree to adjacent trees; conversely, closely packed trees with low branches are especially susceptible to crown ignition and spread (CAL FIRE 2020a). Weather and climate conditions, including drought cycles, can lead to dry vegetation with low moisture content, increasing its flammability.

Figure 4.17-1 Fire Hazard Severity Zones Near Belmont



The Draft Housing Opportunity Sites are either in or near the urbanized Belmont Village Specific Plan Area or in WUI areas and the existing vegetation varies on each site. Sites within the Belmont Village Specific Plan Area, along El Camino Real, Old Country Road, and Ralston Avenue east of Old Country Road are developed with few trees and small grassy areas. The sites west of El Camino Real in the WUI are more vegetated, with the density and amount of tree coverage generally increasing to the west towards the city boundary. Some of these sites, being undeveloped, may currently have various amounts of ladder and aerial fuels from the trees, and some may have sufficient surface fuel in scattered leaves, branches, and dry grass to form an ignition risk. In general, development on these sites would serve to reduce ignition risk by removing or managing these fuels.

Weather and Atmospheric Conditions

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (CAL FIRE 2020a). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. Drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

According to data collected by the Mid-Peninsula Water District (MPWD), most precipitation is received from October through April, with an average annual rainfall of 19.16 inches (MPWD 2020). May through September is the driest time of the year and coincides with what has traditionally been considered the fire season in California. However, increasingly persistent drought and climatic changes in California have resulted in drier winters, and fires during the autumn, winter, and spring months are becoming more common. Prevailing winds in Belmont are generally from the west off of the ocean from February to November, and from the north during December and January (National Oceanic and Atmospheric Administration 2021).

b. Wildfire Hazards

In California, responsibility for wildfire prevention and suppression is shared by federal, State, and local agencies. Federal agencies are responsible for federal lands in Federal Responsibility Areas (FRA). The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of Statewide interest and have classified those lands as State Responsibility Areas (SRA), which are managed by CAL FIRE (US Department of the Interior, US Department of Agriculture, and CAL FIRE 2018). All incorporated areas and other unincorporated lands are classified as Local Responsibility Areas (LRA).

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code Sections 4201-4204 and California Government Code Sections 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards based on zones, referred to as FHSZs. CAL FIRE maps three zones in SRA: 1) Moderate FHSZs; 2) High FHSZs; and 3) Very High FHSZs (VHFHSZs). Only the VHFHSZs are mapped in LRA. Each of the zones influence how people construct buildings and protect property to reduce risk associated with wildfires. Under State regulations, areas within VHFHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life within these areas.

As shown in Figure 4.17-1, southwestern Belmont lies within an LRA VHFHSZ. Both LRA and SRA VHFHSZs lie immediately northwest of the City. The western city border marks the boundary of the SRA High FHSZ to the west. Further west the Fire Hazard Severity drops to Moderate throughout the Golden Gate National Recreation Area and the Crystal Springs Reservoir area. Table 4.17-1 provides

the distance to the nearest VHFHSZ for each Draft Housing Opportunity Site that is not located within the Belmont Village Specific Plan Area or either east of or adjacent to El Camino Real.

Table 4.17-1 Distance to VHFHSZ for Select Draft Opportunity Sites

Draft Housing Opportunity Site No.	Distance to nearest VHFHSZ (miles)	Project Maximum Number of Residential Units
57	0.65	1
72	0.36	1
74	0.28	1
79	0.62	1
88	0.75	1
89	0.33	4
90	0.33	2
96	1.10	1
97	1.24	2
98	0.72	1
99	0.80	1
100	0.72	1
101	0.68	1
102	0.70	1
103	0.65	1
104	0.63	1
106	0.63	1
107	0.63	0
108	0.58	1
110	0.39	1
113	0.70	1
114	0.72	1
119	0.43	1
120	0.39	1
122	0.81	1
125	0.45	1
127	0.40	2
128	0.50	1
130	0.09	2
131	0.23	0
132	0.61	1
133	0.24	1
134	0.24	1
135	0.11	1
139	0.99	0
140	0.98	0
141	0.99	0
Total Sites 37	Total Maximum Residential Units	39

4.17.2 Regulatory Setting

a. Federal Regulations

The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a State-level mitigation plan as a condition of disaster assistance and provides funding to communities developing their own mitigation plans through the Pre-Disaster Mitigation Grant Program. There are two different levels of State disaster plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

b. State Regulations

California Board of Forestry

The Board of Forestry maintains fire safe road regulations, as part of CCR Title 14. This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances. These regulations are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Fire and Building Codes (2019)

The California Fire Code is Chapter 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structure, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California.

More specifically, the Fire Code is included in CCR Title 24. Title 24, part 9, Chapter 7 addresses fire-resistances-rated construction; CBC (Part 2), Chapter 7A addresses materials and construction

methods for exterior wildfire exposure; Fire Code Chapter 8 addresses fire related Interior finishes; Fire Code Chapter 9 addresses fire protection systems; and Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Fire Code Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in FHSZs within SRAs and WUI Fire Areas. This code includes provisions for ignition-resistant construction standards for new buildings.

Wildland-Urban Interface Building Standards

On September 20, 2007, the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the CCR Title 24, Part 2, known as the 2007 CBC. These codes include provisions for ignition-resistant construction standards in the WUI.

Interface zones are areas with dense housing adjacent to vegetation that can burn and meeting the following criteria:

1. Housing density class 2 (one house per 20 acres to one house per 5 acres), 3 (more than one house per 5 acres to one house per acre), or 4 (more than one house per acre)
2. In Moderate, High, or Very High Fire Hazard Severity Zone
3. Not dominated by wildland vegetation (i.e., lifeform not herbaceous, hardwood, conifer, or shrub)
4. Spatially contiguous groups of 30-meter cells¹ that are 10 acres and larger

Intermix zones are housing development interspersed in an area dominated by wildland vegetation and must meet the following criteria:

1. Not interface
2. Housing density class 2
3. Housing density class 3 or 4, dominated by wildland vegetation
4. In Moderate, High, or Very High Fire Hazard Severity Zone
5. Improved parcels only
6. Spatially contiguous groups of 30-meter cells 25 acres and larger

Influence zones have wildfire-susceptible vegetation up to 1.5 miles from an interface zone or intermix zone (CAL FIRE 2019b).

While the 2007 CBC creates WUI definitions for interface, intermix and influence zones in order to apply required construction standards, many local and regional entities use their own definitions of WUI areas for other purposes, ranging from simple resident awareness and public outreach to further municipal-level standards. Virtually all of Belmont west of Alameda de las Pulgas has been designated as an LRA FHSZ by Cal Fire, with the area south of Ralston (the 'Western Hills') designated a Very High FHSZ and the area north of Ralston (the 'San Juan Canyon' area) designated a High FHSZ. The City of Belmont has attempted several times, most recently in 2014, to have Cal Fire switch the designation of the San Juan Canyon area to VHFHSZ (City of Belmont 2014). All of the

¹ Note that "30-meter cells" refers to satellite mapping or Geographic Information Systems (GIS) data, and indicates data is presented as 30-meter by 30-meter squares in the source maps used to determine zone types.

Draft Housing Opportunity Sites west of Alameda de Las Pulgas lie within the San Juan Canyon High FHSZ.

The California Fire Plan

The Strategic Fire Plan for California is the State's road map for reducing the risk of wildfire. The most recent version of the plan was finalized in January 2019 and directs each CAL FIRE Unit to address and meet incremental requirements to achieve four specific goals by 2023, including improving core capabilities, enhancing internal operations, ensuring health and safety, and building an engaged workforce (CAL FIRE 2019). A core element of the plan is increasing staffing levels from 2.67 employees per position to 3.11 employees per position to ensure adequate staffing during times of increased mobilization.

California Office of Emergency Services

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

State Emergency Plan

The foundation of California's emergency planning and response is a Statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the State, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the Act are reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies (CalOES 2020). The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under State disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area,

regional, and State. CalOES divides the State into several mutual aid regions. The County of San Mateo is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalOES 2021).

Government Code Sections 65302 and 65302.5, Senate Bill 1241 (Kehoe) of 2012

Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and Very High FHSZs in the safety element of their general plans. The bill also amended CEQA to direct amendments to the *CEQA Guidelines* Appendix G environmental checklist to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs. In adopting these Guidelines amendments, the Governor's Office of Planning and Research recognized that generally, low-density, leapfrog development may create higher wildfire risks than high-density, infill development.¹ In general, the Draft Housing Opportunity Sites would not be considered leapfrog development sites as they are located near existing development.

California Public Utilities Commission General Order 166

General Order 166 Standard 1.E requires that investor-owned utilities (IOU) develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that IOUs outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by IOUs are required to identify specific parts of the utility's service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the California Public Utilities Commission (CPUC) regarding compliance with General Order 166 (CPUC 2017). Pacific Gas and Electric Company (PG&E) is the electric utility provider for the City of Belmont. The most recently available report for PG&E is dated October 31, 2019 (PG&E 2019). PG&E has developed an interim fire threat map that shows very high fire threats near existing overhead lines in the southwestern part of the City of Belmont, in general south of Ralston Avenue and west of Alameda de las Pulgas (CPUC 2019). The very high fire threat area from overhead power lines closely matches the borders of the VHFHSZ LRA in the same area. While none of the Draft Housing Opportunity Sites are located within the very high fire threat area, several are located within close proximity, including sites 130, 131, 133, 134, and 135.

California Government Code 51182 and Assembly Bill 3074

California Government Code 51182 sets the requirements for creation of defensible space zones around residential units built in WUI areas. Currently the law requires two zones of vegetation management reaching to 30 feet and 100 feet from the residence. In 2020 the legislature passed Assembly Bill 3074, which requires the Board of Forestry to develop regulations for a third zone within 0 to 5 feet of the home by January 1, 2023. Local and regional fire districts are tasked with regulation and inspection of defensible spaces. As of July 1, 2021, documentation of a compliant Defensible Space Inspection by the jurisdictional fire district is a condition of the sale or transfer of any residential property located in a High FHSZ or VHFHSZ.

¹ "Leapfrog development" describes the construction of new development at a distance from existing developed areas, with undeveloped land between the existing and new development.

c. Regional and Local Regulations

San Mateo and Santa Cruz Counties Community Wildfire Protection Plan

Virtually all large wildfires in San Mateo County have burned parts of Santa Cruz County as well, including the CZU Lightning Complex Fire in 2020 (CAL FIRE 2021a). Due to the shared nature of the wildfire risk presented by the Santa Cruz Mountains and associated climate conditions, San Mateo and Santa Cruz developed a joint Community Wildfire Protection Plan with input from many organizations, including State and local fire departments, federal agencies, community groups, and land management agencies. The purpose of the Community Wildfire Protection Plan is to help reduce the potential loss of human life and damage to property, natural and cultural resources within both counties due to wildfire. The plan describes the wildfire risk and potential throughout the counties, designates WUI areas, discusses assets at risk throughout the counties, provides mitigation strategies, and discusses resources available (Santa Cruz/San Mateo 2018).

San Mateo County Multijurisdictional Local Hazard Mitigation Plan

The San Mateo County Multijurisdictional Local Hazard Mitigation Plan (LHMP) incorporates wildfire hazard mitigation principles and practices into the routine government activities and functions of the County. The LHMP is currently in draft form. The LHMP recommends specific actions that are designed to protect people and community assets from losses to those hazards that pose the greatest risk. Mitigation programs and activities identified in the LHMP include fuel reduction and vegetation management, public education and outreach programs, increased training for urban firefighters responding to WUI-area fires, and regional consistency of building code standards (San Mateo County 2021). The County's LHMP is incorporated by reference into the Public Safety Element of the General Plan.

San Mateo County Consolidated Fire District

The San Mateo County Consolidated Fire District (SMCCFD) was established through a Joint Powers Authority agreement between the cities of Belmont, San Mateo, and Foster City. The SMCCFD provides aid response throughout all three cities and parts of unincorporated San Mateo County, including the Harbor Industrial Area within Belmont's sphere of influence. SMCCFD dispatches units from nine fire stations located throughout the three cities, two of which are in Belmont and owned by the Belmont Fire Protection District (BFPD).

San Mateo County Emergency Operations Plan

The San Mateo County Office of Emergency Services (OES), a division of the SMCCFD, is responsible for the mitigation, preparedness, planning, coordination of response, and recovery activities related to county emergencies and disasters. The Office serves as the primary coordination point for emergency management's activities affecting more than one jurisdiction, and the unincorporated areas of the county. The OES became an independent county department in January 2019. BFPD is a member agency of the SMCCFD and is subordinate to the OES in a county-level emergency. BFPD is the designated agency for countywide hazardous materials response, and also provides the "first due" responding units to the unincorporated Harbor Industrial Area and portions of San Mateo and San Carlos due to the strategic location of its facilities.

The County's Emergency Operations Plan addresses the planned response to extraordinary emergency situations associated with large-scale disasters, and includes all cities, special districts,

and unincorporated areas of the County. The plan aims to provide effective life safety measures and reduce property loss and damage to the environment through management and coordination of emergency response operations through OES, provide for the rapid resumption of services and impacted businesses, and provide accurate documentation for cost recovery efforts (San Mateo County 2015).

San Mateo County Code

San Mateo County Fire agencies, including BFPD, universally adopted the 2007 California Fire Code in 2008. Specifically, the County Fire Code consists of Public Resources Code 4291 and CCR Title 14 for defensible space regulations, and CA Building Code Chapter 7A and CA Fire Code Chapter 47 for building standards and regulations.

City of Belmont Fire Code

BFPD also adopted the 2009 International Fire Code with the 2010 California Fire Code Amendments in 2011 and continues to reaffirm their adoption of the current International and California Fire Codes every three years. BFPD has amended the Codes to better reflect local conditions and concerns, as do most municipalities that adopt the International Fire Code.

City of Belmont General Plan

The City's General Plan includes goals and policies to reduce damage from wildfires within its Safety Element and Land Use Element, including:

Goal 2.14 Protect and enhance Belmont's hillside areas and views from public spaces and rights-of-way

Policy 2.14-3: Create clear design standards for the interface between open spaces and neighborhoods, especially in the Urban/ Wildland Interface Zone. Standards should identify the margin of open space needed to allow wildlife, recreation, and aesthetic values to flourish while also reducing threats of fire and invasive plant species. Incorporate "Defensible Space" standards as needed in areas of high wildfire risk.

Goal 6.6 Protect Belmont residents and businesses from potential fire hazards

Policy 6.6-1: Support efforts by [BFPD] to meet its response time standards throughout Belmont, especially in areas in [the WUI]

Policy 6.6-2: Work with [MPWD] to maintain adequate water supply for firefighting, including capacity for peak load under a reasonable worst-case wildland fire scenario, to be determined by [BFPD]. In evaluating sites for new water storage facilities, place a priority on locations least subject to impacts from seismic activity and land sliding.

Policy 6.6-3: Continue to review development proposals to ensure that they incorporate appropriate fire-mitigation measures, including adequate provisions for evacuation and access by emergency responders.

Policy 6.6-4: Continue [BFPDs'] participation in plan review of new buildings in potentially fire-prone areas.

Policy 6.6-5: Continue to require a fire prevention inspection of all buildings used as commercial businesses, places of assembly, multi-family residences, and hotels within [BFPDs'] boundaries.

Policy 6.6-6: Promote and support [BFPDs'] Vegetation Management Program to reduce fire hazards, particularly in areas in the [WUI].

Policy 6.6-7: Continue to participate in State and regional **efforts** to develop a clear legislative and regulatory framework to manage [the WUI].

Action 6.6-7a: Maintain consistency with the San Mateo and Santa Clara Unit's Fire Management Plan to reduce wildland fires in both counties.

Policy 6.6-9: Continue to require development located within the VHFHSZ to maintain 100 feet of defensible space consistent with California Government Code section 51182.

Policy 6.6-10: Continue to require development located within [the WUI] to follow the code requirements in Chapter 7A of the California Building Code, and require buildings to be constructed of ignition-resistant materials and methods.

Policy 6.6-11: Lessen the risk of wildfire and maintain clear and safe access and evacuation routes in areas of high and very high fire hazard severity by continuing to enforce Belmont Municipal Code section 7-401, which classifies nuisances as, in part, overgrown vegetation; dead, decayed, diseased, or hazardous trees, firewood; weeds and other vegetation that may be a fire hazard.

City of Belmont Emergency Operations Plan and Local Emergency Management Committee

The City of Belmont maintains an Emergency Operations Plan developed by the Local Emergency Management Committee, which consists of various government, service provision, and community stakeholders. In local emergencies, the City Emergency Operations Center is activated and staffed, many City employees are mobilized under emergency roles, and the Community Emergency Response Team (CERT) may be mobilized. A wildfire event exclusively contained within the Belmont Western Hills LRA would be tactically managed by SMCCFD. A fire outside of the LRA would become a county-level incident and be managed by the OES, and a wildfire reaching into the SRA would be managed under the SEMS.

4.17.3 Impact Analysis

Methodology and Significance Thresholds

Methodology

Impacts related to wildfire hazards and risks were evaluated using FHSZ mapping for San Mateo County, aerial imagery, and topographic mapping. Additionally, weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents (*California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (2015)).

Consequently, impacts under the thresholds identified below would only be considered significant if the proposed project risks exacerbating those existing environmental conditions.

Significance Thresholds

For purposes of this Program EIR, development facilitated by the project may have a significant adverse impact if the Draft Housing Opportunity Sites are in or near SRAs or VHFHSZs and would do any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

Analysis of wildfire impacts under CEQA is based on whether a project is located in or near SRAs or VHFHSZs. None of the Draft Housing Opportunity Sites are located within an SRA or VHFHSZ, and the definition of “near” has not been clarified through legislation, technical guidance or litigation. For the purposes of this analysis, all of the Draft Housing Opportunity Sites are considered to be ‘near’ the SRAs and VHFHSZs shown in Figure 4.17-1. Much of western Belmont is within a VHFHSZ or local High FHSZ. As shown in Table 4.17-1, many of the Draft Housing Opportunity Sites are located within 1 mile of the VHFHSZ. The furthest sites, located within the Belmont Village Specific Plan Area and east of or adjacent to El Camino Real, are still generally within 2 miles of the VHFHSZ. Therefore, for a conservative analysis, although none of the Draft Housing Opportunity Sites are within an SRA or VHFHSZ, they are all considered to be near these areas.

Threshold:	If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
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Impact WFR-1 THE DRAFT HOUSING OPPORTUNITY SITES ARE LOCATED IN OR NEAR AN SRA OR VHFHSZ. THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF LOCATION OF DEVELOPMENT. IN ADDITION, POPULATION GROWTH UNDER THE PROPOSED PROJECT WOULD BE INCLUDED IN EMERGENCY RESPONSE AND EVACUATION PLANS. THEREFORE, THE PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY RESPONSE OR EVACUATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies, or rezones that would be adopted as part of the project would allow for development in areas where development is currently prohibited. Under the project, the maximum allowable building height would be increased to 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*. This allowable height increase would not result in a significant impact as the total site area impacted would not be expanded beyond the sites already zoned for development. While all of the Draft Housing Opportunity Sites are currently zoned for development, under the project, certain sites within zoning such as those sites within the Service Commercial zoning classification would be rezoned to allow for residential development which would increase the City’s population beyond the Belmont General Plan growth projections. However, the project would be consistent with the

City's Regional Housing Needs Allocation (RHNA) determined by ABAG, as described in Section 4.12, *Population and Housing*. Therefore, the population increase encouraged by the project would be anticipated and would not result in unplanned population increase. City and County emergency response plans are updated regularly and would reflect the most recent population estimates and growth projections. Implementation of the proposed project would not substantially impair adopted emergency response or emergency evacuation plans as the Draft Housing Opportunity Sites would be accessed by existing roadways and would not impair the use of emergency evacuation routes through the modification of roadways. Additionally, as described in Section 4.13, *Public Services and Recreation*, the project would not itself result in the need for new or expanded emergency services, including police and fire protection. Therefore, the implementation of emergency response procedures would not be affected. The County and City Emergency Operations Plans establish the emergency management organization for emergency response, establish operational procedures associated with emergency management, and provide a flexible platform for planning emergency response. Development facilitated by the project would be constructed in accordance with federal, State, regional, and local requirements, which are intended to ensure the safety of residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the City of Belmont's adopted emergency response plan also known as the Emergency Operations Plans. The project would not impair an emergency response or emergency evacuation plan or facilitate development on sites where development is currently prohibited by zoning. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
Threshold:	If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact WFR-2 THE DRAFT HOUSING OPPORTUNITY SITES ARE NEAR STATE RESPONSIBILITY AREAS AND NEAR HIGH AND VERY HIGH FHSZs. THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF ALLOWING DEVELOPMENT ON SITES WITH HEIGHTENED WILDFIRE RISKS. DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT INCREASE THE LIKELIHOOD OF PROJECT OCCUPANTS AND STRUCTURES TO BE EXPOSED TO WILDFIRE RISK. THEREFORE, THE PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO SIGNIFICANT RISKS RESULTING FROM WILDFIRES SUCH AS EXACERBATED POLLUTION CONCENTRATIONS, THE UNCONTROLLED SPREAD OF WILDFIRES, FLOODING, OR LANDSLIDES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Severe wildfires damage the forest or shrub canopy, the plants below, as well as the soil. In general, this can result in increased runoff after intense rainfall, which can put homes and other structures

below a burned area at risk of localized floods and landslides. As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies, or rezones that would be adopted as part of the project would allow development in areas where such activities are currently prohibited. Under the project, the maximum allowable building height would be increased to 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*. This allowable height increase would not result in a significant impact as the total site area impacted would not be expanded beyond the sites already zoned for development. Draft Housing Opportunity Sites vary in terms of wildfire-related risk exposure; however, because they are all currently zoned for development, implementation of the project would not exacerbate identified wildfire-related risks or increase the likelihood of their occurrence.

New construction would be subject to the California Fire Code, which include safety measures to minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. Fire sprinklers would be required in residential developments pursuant to the San Mateo County Code and Chapter 7 of the Belmont City Code. Construction would also be required to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry, via CCR Title 14, sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. Furthermore, City of Belmont General Plan policies such as Policies 6.6-6, 6.6-9, 6.6-10, and 6.6-11 promote landscape management, defensible space, and ignition-resistant building practices to reduce risk of wildfires, especially in the WUI. Implementation of these policies would further reduce impacts associated with wildfires. The codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments encouraged by the project.

As all of the Draft Housing Opportunity Sites are currently zoned for development, the project would not exacerbate impacts related to the development of the Draft Housing Opportunity Sites or increase the likelihood that project occupants or structures would be affected by wildfires in the form of exacerbated pollution concentrations; the uncontrolled spread of wildfires; or flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
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Impact WFR-3 THE DRAFT HOUSING OPPORTUNITY SITES ARE NEAR STATE RESPONSIBILITY AREAS AND NEAR HIGH AND VERY HIGH FHSZs. THE PROPOSED PROJECT WOULD NOT CHANGE THE DEVELOPMENT POTENTIAL ON THE DRAFT HOUSING OPPORTUNITY SITES IN TERMS OF LOCATION OF DEVELOPMENT; THEREFORE, THE PROJECT WOULD NOT REQUIRE INSTALLATION OR MAINTENANCE OF INFRASTRUCTURE THAT WOULD EXACERBATE FIRE RISK OR RESULT IN TEMPORARY OR ONGOING IMPACTS TO THE ENVIRONMENT BEYOND THAT ANTICIPATED UNDER CURRENT ZONING. THERE WOULD BE NO IMPACT.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies, or rezones that would be adopted as part of the project would allow development in areas where such activities are currently prohibited. Under the project, the maximum allowable building height would be increased to 65 feet along the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*. This allowable height increase would not result in a significant impact as the total site area impacted would not be expanded beyond the sites already zoned for development. The project would not require the installation or maintenance of infrastructure beyond that already anticipated and would not exacerbate fire risk on that basis or result in temporary or ongoing impacts to the environment. New structures and on-site infrastructure which would be constructed to current fire and building codes and safety standards. As the project would not increase the amount of infrastructure needed to service the Draft Housing Opportunity Sites, no impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

There would be no impact.

4.17.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for cumulative wildfire impacts is all of San Mateo County, as well as neighboring Santa Cruz County (which shares a Community Wildfire Protection Plan with San Mateo County). This geographic scope is appropriate for wildfire because wildfires can cause impacts to large areas. Development that is considered part of the cumulative analysis includes buildout of the City and County General Plans, and buildout of areas adjacent to the Draft Housing Opportunity Sites such as future commercial development in the Belmont Village Specific Plan Area.

In San Mateo and Santa Cruz Counties, the VHFHSZs are located largely along the WUI borders with the mountainous western areas, such as those shown in Figure 4.17-1 and virtually all of the Santa Cruz Mountains, the large State parks and open spaces west of Interstate 280, and the unincorporated areas of the two counties are SRA FHSZs ranging from Moderate to Very High. Still

more areas are LRA FHSZs designated as High, such as the 'San Juan Canyon' region of Belmont. Within the geographic scope for this cumulative analysis wildfire-related impacts could be significant if development is in or near high fire hazard areas that could exacerbate risks. Cumulative development throughout the counties would increase the density of development in urban areas and within designated urban service areas, as well as within WUI areas which could exacerbate wildfire risks. All new development and infrastructure would be subject to Statewide standards for fire safety in the California Fire Code, as described in Impact WFR-2.

As discussed in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. None of the programs, policies or rezones that would be adopted as part of the Housing Element update would allow grading or other ground disturbance or development in areas where such activities are currently prohibited. Existing policies and regulations would continue to apply to development in Belmont and address wildfire impacts as under existing conditions. Although rezoning under the proposed project would increase the allowable height on some Draft Housing Opportunity Sites, especially within the El Camino Real corridor as shown in Figure 2-4 in Section 2, *Project Description*, this would not have a significant impact as the area of development would not change. Therefore, the project would not substantially contribute to a cumulative wildfire impact.

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5 Other CEQA Required Discussions

This section discusses the potential growth-inducing impacts and irreversible environmental impacts associated with the implementation of the proposed project.

5.1 Growth Inducement

CEQA Guidelines Section 15126(d) requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

As discussed in Section 4.12, *Population and Housing*, while development facilitated by the proposed project would directly generate population growth, the City has established the need for additional housing. The project would facilitate an estimated population growth of approximately 8,000 new residents by 2031 based on the maximum project-facilitated buildout of 3,225 housing units. While the proposed project would increase the buildout potential beyond that anticipated in the current General Plan and Belmont Village Specific Plan, the project would be consistent with City-identified housing need and the Regional Housing Needs Allocation (RHNA), as it would allow the future development of new housing on the Draft Housing Opportunity Sites (City of Belmont 2017a; City of Belmont 2017b), and the General Plan and Belmont Village Specific Plan would be subsequently updated for consistency with the proposed project. Additionally, the increase in housing and population from the provision of this new housing would be within the Association of Bay Area Governments (ABAG) estimates for the region's housing needs (ABAG 2021).

Moreover, as discussed in Section 4.2, *Air Quality*, and Section 4.7, *Greenhouse Gas Emissions*, development facilitated by the proposed project would not generate air quality or greenhouse gas emissions that would result in a significant impact. Additionally, the project would not involve the expansion of the existing City limits or the City's sphere of influence or substantial extension of infrastructure outside of City limits; rather, it involves maximizing density within the Draft Housing Opportunity Sites, which has been analyzed in detail throughout this EIR. However, as described in Section 2, *Project Description*, there are four contiguous Draft Housing Opportunity Sites outside of City limits but within the City's sphere of influence (sites 80, 83, 136, and 137). A proposal to annex those sites into City limits has been received by the San Mateo Local Agency Formation Commission (LAFCo) and annexation approval is expected before the project is adopted in January 2023.

Therefore, population growth associated with the project would not result in significant long-term physical environmental effects, as described throughout Section 4.

5.1.2 Economic Growth

Development facilitated by the project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, project construction would not be growth-inducing from an employment standpoint. The proposed project would not induce substantial economic expansion to the extent that direct physical environmental effects would result.

5.1.3 Removal of Obstacles to Growth

As discussed in Section 2, *Project Description*, the Draft Housing Opportunity Sites are zoned for development. The Draft Housing Opportunity Sites are mostly located within City limits and are served by existing infrastructure. As discussed in Section 4.14, *Transportation* and Section 4.16, *Utilities and Service Systems* of this EIR, installation of upsized sewer lines, additional water main lines, and additional lateral connections may be required by development facilitated by the project, but this would occur in disturbed rights-of-way of existing roads or within the disturbance footprints of projects, and would not cause significant effects beyond those already identified in this EIR. No new electrical transmission, distribution, telephone, or cable lines would be required. Because the project would facilitate development on underdeveloped and underutilized lots within urbanized areas and would not require the extension of infrastructure through undeveloped areas, project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(c) requires EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

As stated in Section 2, *Project Description*, the Draft Housing Opportunity Sites are zoned for development. Therefore, the project itself would not induce significant irreversible environmental changes beyond the current zoning conditions related to development.

The project would facilitate infill residential development on undeveloped and underdeveloped sites in the City of Belmont. Construction and operation of development facilitated by the project would involve an irreversible commitment of construction materials and non-renewable energy resources. Development would involve the use of building materials and energy, some of which are non-renewable resources, to construct new residential buildings and associated infrastructure and landscaping. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

Development facilitated by the project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the project. As described in Section 4.5, *Energy*, development facilitated by the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated residential buildings, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Consequently, development facilitated by

the project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and renewable resources would be less than significant. Consumption of these resources would occur with any development in the region and is not unique to the proposed project.

5.3 Mandatory Findings of Significance

Following each environmental impact discussion in Section 4, *Environmental Impact Analysis*, is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure could cause a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the project in conjunction with the build-out of the City General Plan.

CEQA Guidelines Section 15065 also requires the following specific Mandatory Findings of Significance be addressed as part of the environmental review for the project:

- The potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;
- Project impacts that are individually limited, but cumulatively considerable. (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects); and
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly.

Besides air quality and noise, the impact areas addressed by this Mandatory Findings of Significance section would be less than significant. Potential adverse environmental effects to human beings are discussed in Section 4.2, *Air Quality* and Section 4.11, *Noise*. Furthermore, as discussed above, each environmental analysis section of the EIR concludes with a discussion of the project’s contribution to cumulative effects.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the project.

5.3.1 Secondary Effects

According to *CEQA Guidelines* Section 15126.4(a)(1)(D), an EIR should analyze whether mitigation measures would cause one or more significant effects in addition to those that would be caused by the project as proposed. As such, this section discusses potential secondary effects from implementation of mitigation measures that would be imposed on development facilitated by the project.

Mitigation Measure AES-1 would not result in secondary effects on the environment, as it relates to project design along El Camino Real in the Corridor Mixed Use (CMU) zone. This mitigation measure

would reduce aesthetic impacts to the environment and would not create additional environmental impacts.

Mitigation Measures AQ-1 and AQ-2 are construction measures designed to reduce construction-related emissions of air pollutants and include reduction of idling times, limitations on vehicle speeds, proper vehicle maintenance, vehicle washing, and erosion control. These measures would reduce air pollution emissions and air quality nuisances and would not create additional environmental impacts. Mitigation Measure AQ-3 would involve preparing a roadway health risk assessment to evaluate the health risks and impacts of El Camino Real on future residential development. These measures could result in the implementation of project design features but would not result in additional environmental impacts.

Mitigation Measure NOI-1 is a vibration reduction measure aimed at reducing impacts from high-vibration activities by using lower-vibration equipment and/or avoiding use of vibrating equipment consistent with best engineering practices. These would reduce vibration levels but would not create new environmental impacts.

6 Alternatives

As required by *CEQA Guidelines* Section 15126.6, this chapter examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the project objectives are as follows:

- Update the General Plan's Housing Element to comply with State-mandated housing requirements
- Provide a framework, including rezoning site as necessary, for accommodating approximately 1,785 new housing units, with a buffer of up to 1,515 new housing units to ensure ongoing compliance with No Net Loss provisions of State housing law, for a total of 3,300 units, at all levels of affordability within access to transit, Downtown jobs, services, and open spaces.
- Be consistent with the City's expectation for growth forecasts to exceed those in its 2035 General Plan and Belmont Village Specific Plan.
- Anticipate better zoning utilization effort targeted along the entire El Camino Real corridor by rezoning SC sites to CMU and amending General Plan land use designations to be consistent with zoning.
- Amend other elements of the City's General Plan as needed to maintain internal consistency between the elements.

This analysis presents two alternatives including the CEQA-required “no project” alternative that involve changes to the project that may reduce the project-related environmental impacts identified in this EIR. These Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

1. Alternative 1: No Project
2. Alternative 2: Increased Density/Height

Table 6-1 provides a summary comparison of the proposed project and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 and 6.2.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

	Proposed Project	Alternative 1: No Project	Alternative 2: Increased Density/Height ¹
Total Allowable Dwelling Units Under Alternative	3,300	2,216	4,335
Change in Total Maximum Dwelling Units Compared to Proposed Project	n/a	-1,084	+1,035
Total Additional Residents Under Alternative	8,250	5,540	10,837
Change in Population Potential Compared to Proposed Project (Number of Residents)	n/a	-2,710	+2,587

¹ Total dwelling units and residents were calculated assuming all Draft Housing Opportunity Sites along the El Camino Real corridor would be built with a higher density and building height as described in Section 6.2.1.

6.1 Alternative 1: No Project Alternative

The *CEQA Guidelines* (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative typically will proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be continuation of the existing plan or policy; or (2) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. In this case, the No Project Alternative represents the continuation of existing zoning and General Plan designations on the Draft Housing Opportunity Sites, and full buildout under those existing designations is assumed to occur under this alternative. Typical development assumptions are included in the below analysis of this alternative, including compliance with applicable regulations or typical City-required measures.

6.1.1 Description

The No Project Alternative assumes there is no change in zoning or General Plan land use designations for the parcels identified by the project. Current uses on the sites would continue under this alternative, with future full buildout of the Draft Housing Opportunity Sites limited by the existing zoning and General Plan designations. Buildout of the Draft Housing Opportunity Sites under existing zoning would allow for up to 2,216 total housing units, housing a population of 5,540 residents (refer to Table 6-1). This alternative would only accomplish two of the four objectives identified for the project. It would not accomplish the project objectives of planning a buffer of up to 1,415 new housing units to ensure ongoing compliance with the No Net Loss provisions of State housing law and it would not anticipate better zoning utilization along the El Camino Real corridor.

6.1.2 Impact Analysis

Aesthetics

Under the No Project Alternative, buildout consistent with the existing zoning and land use of the Draft Housing Opportunity Sites would occur. The Draft Housing Opportunity Sites do not offer notable scenic vistas and are not within the view of a State scenic highway, as described under Impact AES-1. Similar to the proposed project, mitigation may be applied to individual projects to

reduce visual impact during the project design review process. Development allowed under existing zoning would also increase lighting and glare on some of the Draft Housing Opportunity Sites, but fewer Draft Housing Opportunity Sites than under the proposed project. Similarly, compliance with City General Plan goals and policies and the Belmont Village Planning Area's urban design development standards required through the design review process and building permit applications would still be required. Impacts would be reduced when compared to the proposed project.

Air Quality

Under the No Project Alternative, fewer residential units would be constructed than the project, consistent with allowed existing zoning. Temporary construction-related air quality impacts from grading and construction and long-term air quality impacts from building operation (energy usage, maintenance), would be lower than under the proposed project. Individual project mitigation may be required to ensure compliance with BAAQMD's current recommended basic control measures to comply with standard permit conditions. Impacts would be reduced when compared to the proposed project.

Biological Resources

The No Project Alternative would allow development under existing zoning. Because of the potential for sensitive species and habitats to exist on the Draft Housing Opportunity Sites, especially those that lie outside of the El Camino Real corridor, direct impacts to biological resources would be similar to those that would occur with the proposed project, but only 2,216 dwelling units would be developed. Development allowed under the No Project Alternative would be smaller in terms of number of sites developed; however, ground disturbance and vegetation removal, especially of Draft Housing Opportunity Sites outside of the El Camino Real corridor such as Draft Housing Opportunity Site 132, would result in similar impacts to biological resources. Under the No Project Alternative, development of the Draft Housing Opportunity Sites would not increase the likelihood of special-status species being affected and there would be no impact on special-status species. Therefore, impacts under the No Project Alternative would be similar to the impacts under the proposed project with implementation of relevant General Plan Policies mentioned in Section 4.3, *Biological Resources*.

Cultural Resources

The No Project Alternative would allow development under existing zoning at a smaller scale than under the proposed project but could still entail ground disturbance or excavation activities. There are no known historical resources located within the Draft Housing Opportunity Sites besides Site 61. Ground disturbance from development allowed under existing zoning would still have potential impacts to archaeological resources and human remains, although likely to a lesser extent than under the proposed project due to fewer residential units. As all of the Draft Housing Opportunity Sites are currently zoned for development, development under the No Project Alternative would not create any new and significant impacts to cultural resources. Potential impacts would be addressed by regulations established in the City's General Plan and Municipal Code. As the No Project Alternative would result in the same number of Draft Housing Opportunity Sites being affected as under the proposed project, impacts would be similar to the proposed project.

Energy

Under the No Project Alternative, construction- and operation-related energy use from development allowed under the existing zoning of the Draft Housing Opportunity Sites would occur, but the decreased scale and intensity of the allowed development would be less than under the proposed project. Similar to the proposed project, development under the No Project Alternative would comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (California Code of Regulations Title 24, Parts 6 and 11) or later versions, which require certain energy efficient development features. Impacts would be reduced when compared to the proposed project.

Geology and Soils

The No Project Alternative would allow for development under existing zoning, which would involve construction or ground disturbance that could expose and loosen soils and increase the potential for erosion. The Draft Housing Opportunity Sites remain outside Alquist-Priolo fault zones, and future construction on any of the sites would be required to comply with California Building Code requirements and implement General Plan goals and policies, ensuring the stability of new structures during seismic events or due to unstable or expansive soils. Development allowed under existing zoning, similar to development facilitated by the proposed project, would occur within areas of high paleontological sensitivity; however, the No Project Alternative would allow fewer residential units to be developed than under the proposed project. Impacts would be similar when compared to the proposed project.

Greenhouse Gas Emissions

Under the No Project Alternative, less development would occur, consistent with allowed existing zoning. Temporary construction-related GHG emissions that result from grading and construction of new development and long-term impacts resulting from building operation (energy use, maintenance, and traffic) would be lower than under the proposed project. Impacts would be reduced when compared to the proposed project.

Hazards and Hazardous Materials

Under the No Project Alternative, the transport, storage, and use of hazardous materials associated with construction of development allowed under existing zoning, and operation of housing, commercial and industrial uses, such as paints and solvents, would be required to comply with existing regulations, similar to the proposed project. Sites containing existing or potential contamination would continue to require remediation and compliance with State and local regulations to allow for development under existing zoning. The Draft Housing Opportunity Sites would remain within Area A and Area B of the Airport Influence Area. Impacts related to airport safety hazards and noise would be less than significant with compliance with General Plan goals and policies and San Carlos ALUCP goals and policies. As stated in Section 2, *Project Description*, all of the Draft Housing Opportunity Sites are currently zoned for development. As such, implementation of the No Project Alternative which would involve development of sites already zoned for development would not increase the likelihood of wildland fires and impacts would be less than significant. Impacts would be similar to those under the proposed project.

Hydrology and Water Quality

The No Project Alternative would allow development under existing zoning, which could include construction activities that would loosen and expose soils, otherwise increase the potential for soil erosion and sedimentation, and create new or additional impervious surfaces. Due to the fewer development sites allowed under existing zoning, these impacts would be less than those under the proposed project. Similar to the proposed project, development allowed under the No Project Alternative would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. The smaller total buildout allowed under existing zoning would have fewer impacts on hydrology and water quality than the proposed project. Impacts would be reduced when compared to the proposed project.

Land Use and Planning

Under the No Project Alternative, the Draft Housing Opportunity Sites would retain their existing zoning, allowing future buildout in accordance with that zoning. The No Project Alternative would not alter connectivity with adjacent areas or divide established communities. Future development under existing zoning would be required to comply with regulatory goals and policies, similar to the proposed project, as discussed in Impact LU-2. The No Project Alternative would result in less intensive future development, which would not promote high-density housing opportunities to the extent that the proposed project would in terms of consistency with Plan Bay Area and General Plan goals and policies around encouraging the development of accessible housing. Impacts would be similar to the proposed project.

Noise

Under the No Project Alternative, less intensive impacts associated with temporary construction-related noise would result from grading and construction of development allowed under existing zoning, as less intensive development of the Draft Housing Opportunity Sites would be allowed. Less intensive long-term noise impacts resulting from building operation and fewer vehicle trips would also occur. Individual project mitigation may be required to reduce project-specific noise and vibration impacts in compliance with standard permit conditions. Impacts would be reduced when compared to the proposed project.

Population and Housing

Since development would follow existing zoning, the No Project Alternative would not induce substantial population growth, as the development allowed under existing zoning is already accounted for in regional population and housing projections. As a result, the No Project Alternative would not contribute to unplanned growth and would also not displace people or housing. The No Project Alternative would have no impacts to population and housing, while the proposed project would have less than significant impacts. Impacts under the No Project Alternative would be less than those for the proposed project. However, the No Project Alternative would not provide the benefits associated with the provision of housing that would occur under the proposed project.

Public Services and Recreation

Development allowed by existing zoning would occur under the No Project Alternative, and this alternative would result in a smaller increase to emergency calls to the area, as well as a smaller increase in additional demand for schools, parks, libraries, recreational facilities, or other public

services compared to the proposed project as the project would result in a population growth of 5,540 people, 2,710 people less than the proposed project. Impacts under the No Project Alternative would be less than that under the proposed project.

Transportation

Under the No Project Alternative, less intensive temporary construction-related traffic impacts from grading and construction of development allowed under existing zoning would occur. The No Project Alternative would have a smaller increase in transit demand or interference with existing or planned transit facilities than the proposed project due to the smaller population growth compared to the proposed project. The No Project Alternative would result in a smaller increase in overall VMT due to the reduced number of units which would be built though VMT per capita would increase due to the reduced population growth that would take place. Similar to the proposed project, the No Project Alternative would meet the City's VMT screening criteria and would therefore not result in a substantial increase in VMT. Impacts would be reduced when compared to the proposed project.

Tribal Cultural Resources

The No Project Alternative would allow development under existing zoning, which could entail ground disturbance or excavation activities, on the same sites as the proposed project. As established under Section 2, *Project Description*, the Draft Housing Opportunity Sites are currently zoned for development. Therefore, development under the proposed project would not increase the likelihood of impacting tribal cultural resources. In addition, because the Draft Housing Opportunity Sites under the No Project Alternative could still be developed under existing zoning and tribal cultural resources would still be provided the same level of protection as under the proposed project, this alternative's impacts to tribal cultural resources would be the same as the proposed project.

Utilities and Service Systems

Development allowed under existing zoning would occur under the No Project Alternative. This would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service. This increase in demand would be less than the proposed project due to the reduced development potential allowed under existing zoning; however, the expansion of water, wastewater, electricity, natural gas, and telecommunication infrastructure would still be required for sites where existing utility lines and connections do not already exist or are not large enough to service the Draft Housing Opportunity Sites. Impacts would be reduced when compared to the proposed project.

Wildfire

Under the No Project Alternative, development under existing zoning would be allowed on sites that are mapped within or near SRAs and fire hazard zones. Individual Draft Housing Opportunity Sites with the potential to be affected by wildfires are identified in Section 4.21, *Wildfire*. As stated in Section 2, *Project Description*, and discussed on Section 4.21, *Wildfire*, all of the Draft Housing Opportunity Sites are currently zoned for development. Therefore, development facilitated under the No Project Alternative would not increase the likelihood of wildfire impacts occurring. Construction would require building permits and would be required to comply with applicable fire code regulations. Similar to the proposed project, impacts would be less than significant.

Cumulative Impacts

Based on the analysis herein, the No Project Alternative would have lesser impacts to aesthetics, air quality, cultural resources, energy, GHG emissions, hydrology and water quality, noise, population and housing, public services and recreation, transportation, tribal cultural resources, and utilities and service systems than the proposed project. Impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, tribal cultural resources, and wildfire would be similar to the proposed project. Because impacts under the No Project Alternative would be less than or similar to the proposed project, and the proposed project's contribution to cumulative impacts analyzed in the General Plan and Specific Plan EIRs for most of these resource areas was determined not to be cumulatively considerable, the No Project Alternative would also not be cumulatively considerable.

6.2 Alternative 2: Increased Density/Height

6.2.1 Description

This alternative analyzes the same number of Draft Housing Opportunity Sites as the proposed project, but selected sites along the El Camino Real corridor could be developed with retail located on the first floor and up to 9 floors of residential units on the floors above, rather than the maximum of six stories under the proposed project. The Draft Housing Opportunity Sites identified as sites for increased density/height under this alternative are listed below and shown in Figure 6-1.

- Sites 1-26
- Site 28
- Sites 30-56
- Sites 58-71
- Site 73
- Sites 75-78
- Sites 80-83
- Sites 85-87
- Sites 91-93
- Site 95
- Site 105
- Site 116
- Site 121
- Site 123
- Site 129
- Site 136-138
- Site 142
- Site 144
- Use: Current zoning designations along the El Camino Real corridor which allow mixed uses include the Corridor Mixed Use District (CMU), Harbor Industrial Area (HIA-1), Village Station Core (VSC), Village Core (VC), and Village Corridor Mixed Use (VCMU). Sites zoned Service Commercial (SC) currently do not allow mixed uses. This alternative would allow mixed use development in all of these districts.
- Height: Buildout under this alternative would result in buildings up to 10 stories in height with ground floor retail built along the El Camino Real corridor, compared to the maximum 6 stories which would be allowed under the proposed project.

For purposes of the environmental analysis, it was assumed that all 94 Draft Housing Opportunity Sites located around the El Camino Real corridor identified in Figure 6-1 would be developed with a combination of commercial and residential uses. This assumption was used to develop an alternative that would reduce or avoid environmental impacts, particularly those related to VMT, to the extent feasible.

Figure 6-1 Alternative 2: Increased Density/Height Sites



Alternative 2 would result in approximately 4,335 new dwelling units and approximately 10,837 new residents. This would equate to approximately 1,035 more units and approximately 2,587 more new residents than the proposed project. This pattern of development would encourage locally serving retail uses along with residences at the Draft Housing Opportunity Sites, which would reduce the VMT for residents of those sites and surrounding areas because they would live closer to more and potentially a wider variety of commercial uses and services. This alternative would meet or exceed all of the project objectives.

6.2.2 Impact Analysis

Aesthetics

For purposes of the analysis, it was assumed that the development facilitated by Alternative 2 would be mixed use in nature and the building envelopes and heights would be taller than under the proposed project along the El Camino Real corridor. The increase in allowed building heights would have a similar or slightly increased impact on scenic vistas compared to the proposed project as the additional height allowed under Alternative 2 would further block views of scenic resources such as wooded hills identified in the General Plan. Impacts to scenic resources would be similar to the proposed project due to the lack of visibility of the Draft Housing Opportunity Sites from a state scenic highway. Impacts to visual character or quality would be similar to the proposed project due to the visual impact taller buildings would have along the El Camino Real corridor which currently has a maximum building height of four stories. Development under Alternative 2 would be required to reduce visual impacts related to taller buildings along the El Camino Real corridor similar to the proposed project through implementation of Mitigation Measure AES-1. This would reduce impacts to less than significant. Impacts from lighting and glare under Alternative 2 would be similar or slightly increased due to the increased number of building stories and windows which could be a source of glare. To reduce potential impacts related to window glare, a new mitigation measure specifically for Alternative 2 would be required to limit light and glare through project design and architectural treatments such as use of low reflectivity glass.

Mitigation Measure AES-1 and Alternative 2-specific mitigation to address light and glare would be required to reduce impacts. Impacts would be incrementally greater than those under the proposed project and would be less than significant with mitigation.

Air Quality

Under Alternative 2, an increased amount of development would occur compared to the proposed project, with approximately one tenth of the residential square footage under the proposed project along the El Camino Real corridor replaced with commercial uses. Temporary construction-related air quality impacts that result from grading and construction would be increased compared to the proposed project, as building envelopes and sizes would increase from a maximum of 6 stories to a maximum of 10 stories and would likely require deeper foundations and excavation to support increased building heights. Alternative 2 would have a lower VMT per capita during operation than the proposed project, as the residences under Alternative 2 would have improved access to locally serving retail due to the mixed-use nature of this alternative. However, overall VMT would be greater overall than under the proposed project due to the increased population which would be facilitated under Alternative 2. Therefore, Alternative 2 would result in overall increased operational air quality emissions compared to the proposed project and would have increased air quality impacts as a result. Mitigation Measures AQ-1, AQ-2, and AQ-3 would still be required to reduce

construction-related air quality impacts and assess air quality impacts related to constructing residences near the El Camino Real corridor. Impacts would be slightly increased when compared to the proposed project and would remain less than significant with mitigation.

Biological Resources

Under Alternative 2, buildout of the Draft Housing Opportunity Sites would occur, similar to the proposed project. The development facilitated by Alternative 2 along the El Camino Real corridor would be mixed use in nature, but the required area of ground disturbance would be the same as under the proposed project. Because the area of ground disturbance would be similar to the proposed project, impacts on special-status species, riparian or sensitive habitats, protected wetlands, and wildlife movement would be the same; therefore, impacts would be less than significant. Impacts would be similar to the proposed project.

Cultural Resources

Under Alternative 2, buildout of the Draft Housing Opportunity Sites would occur, similar to the proposed project. The development facilitated by Alternative 2 along the El Camino Real corridor would be mixed use in nature, but the required area of ground disturbance would be the same as under the proposed project. Due to the increased building height which would be encouraged under Alternative 2, deeper foundations and additional excavation would likely be needed. However, as excavation and ground disturbance would already be needed under the proposed project, impacts would be similar to those under the proposed project. Therefore, impacts to historic resources, archaeological resources, and human remains would be less than significant. Impacts would be similar to the proposed project.

Energy

The development facilitated by Alternative 2 along the El Camino Real corridor would be mixed use in nature, which would lower per-capita VMT compared to the proposed project, but the energy requirements for construction and operation would be increased due to the increased building sizes and envelopes. Similar to the proposed project, development facilitated by Alternative 2 would be required to comply with the 2019 California Building Energy Efficiency Standards for Residential Buildings and CALGreen (California Code of Regulations Title 24, Parts 6 and 11) or later versions, which require certain energy-efficient development features. Alternative 2 would have a higher overall amount of VMT than the proposed project due to the increased number of people who would reside in development built under Alternative 2. The operational energy use associated with the electricity consumption of the up to 10 story buildings along the El Camino Real corridor would also be increased compared to that under the proposed project. However, development facilitated by Alternative 2 would result in increased energy efficiency during project operation due to the increased density near transit options such as the Belmont Caltrain station. Therefore, the project under Alternative 2 would result in a more efficient use of energy than under the proposed project and would have a less than significant impact.

Geology and Soils

Under Alternative 2, buildout of the Draft Housing Opportunity Sites would occur, similar to the proposed project. The development facilitated by Alternative 2 along the El Camino Real corridor would be mixed use in nature. As the buildings constructed under Alternative 2 along the El Camino Real corridor would be taller than those under the proposed project, deeper foundations and more

excavation may be necessary. However, as construction activities like excavation would already be conducted under the proposed project, Alternative 2 would not significantly increase geological or soil erosion impacts. With required adherence to CBC regulations, impacts from earthquakes and seismic-related ground failure would be similar to the proposed project. Impacts from erosion would be similar to the proposed project through implementation of regulations identified in Section 4.6, *Geology and Soils*. Impacts would be similar to the proposed project and less than significant.

Greenhouse Gas Emissions

Under Alternative 2, an increased amount of development would occur as mixed-use development on the Draft Housing Opportunity Sites along the El Camino Real corridor would have larger building envelopes and reach a maximum of 10 stories compared to the maximum 6 stories allowed under the proposed project. Construction-related GHG emissions that result from grading and construction would be increased compared to the proposed project, as building envelopes and sizes would be approximately 67 percent larger. Alternative 2 would have a lower operational VMT per capita compared to the proposed project, as locally serving retail would be close to new residences due to the mixed-use nature of this alternative and more dwelling units would be located near transit such as the Belmont Caltrain station. Therefore, Alternative 2 would result in increased overall operational GHG emissions compared to the proposed project and would have greater overall GHG impacts as a result. However, GHG emissions per capita would decrease as residents would be in proximity to commercial uses and transit which would reduce VMT per capita. In addition, development under Alternative 2 would have the same or increased compatibility with the 2017 Scoping Plan, Plan Bay Area 2040¹, City General Plan, and City Climate Action Plan detailed in Section 4.7, *Greenhouse Gas Emissions*, as development under Alternative 2 would reduce VMT per capita; facilitate economic expansion through mixed-use development; and encourage higher density, transit-oriented, and mixed-use development. Impacts would be reduced when compared to the proposed project and would remain less than significant.

Hazards and Hazardous Materials

Under Alternative 2, buildout of the Draft Housing Opportunity Sites would occur similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature along the El Camino Real corridor. The building envelope and required ground disturbance would be increased on sites identified in Figure 6-1 compared to development under the proposed project. Because Alternative 2 would include ground-floor commercial use, hazardous materials are more likely to be used on site and impacts from hazardous materials transport would be incrementally increased on sites along the El Camino Real corridor. Impacts from development on sites under Alternative 2 included on a list of sites pursuant to Government Code Section 65926.5 would be similar to those under the proposed project as the same Draft Housing Opportunity Sites would have the potential to be developed under each scenario. The height increase to up to 10 stories under Alternative 2 along the El Camino Real corridor could affect airport safety. Pursuant to Federal Aviation Administration Section 77.9(b), any structure within 10,000 feet of a runway less than 3,200 feet in length and exceeding a ratio of 50 to 1 slope would be required to file Federal Aviation Administration (FAA) Form 7460-1: Notice of Proposed Construction or Alteration. As discussed in Section 4.8, *Hazards and Hazardous Materials*, buildings under the proposed project would require filing FAA Form 7460-1. Therefore, while the maximum height allowed along the El

¹ Although Plan Bay Area 2050 was adopted in October 2021, the growth projections do not include data at the city level. Therefore, this analysis relies on growth projections from Plan Bay Area 2040, which was adopted in July 2017.

Camino Real corridor would be increased, filing FAA Form 7460-1 would ensure that airport hazards would remain less than significant. Impacts related to impairment of an emergency plan would be similar to the proposed project and less than significant as the emergency plan would be updated based on population growth as detailed in Section 4.8, *Hazards and Hazardous Materials*. Impacts would be less than significant following compliance with applicable hazardous materials laws and regulations but would be slightly increased compared to impacts under the proposed project due to the additional commercial uses facilitated by the mixed-use nature of Alternative 2 and the increased maximum allowed height in proximity to the San Carlos Airport. Hazards and hazardous materials impacts would remain less than significant through compliance with existing laws and regulations.

Hydrology and Water Quality

Alternative 2 would allow mixed-use development on the Draft Housing Opportunity Sites, which would include construction activities of taller buildings than the proposed project. As development under Alternative 2 along the El Camino Real corridor would result in taller buildings, deeper foundations and more excavation may be needed. In addition, the overall volume of the buildings along the El Camino Real corridor would be larger. Overall ground disturbance and area of impervious surfaces would be similar to that under the proposed project. Similar to the proposed project, development allowed under Alternative 2 would not substantially decrease groundwater supplies or violate water quality standards, following compliance with applicable laws and regulations. Therefore, impacts would be similar to the proposed project and remain less than significant.

Land Use and Planning

Alternative 2 would facilitate mixed-use development on the Draft Housing Opportunity Sites along the El Camino Real corridor. Similar to the proposed project, Alternative 2 would not alter connectivity with adjacent areas or divide established communities, as it would encourage infill development within designated urban service areas. Under Alternative 2, development would be consistent with the General Plan goals and policies identified in Section 4.10, *Land Use and Planning*, as development under Alternative 2 would encourage housing development, development of infill sites, and mixed-use development. This aligns with General Plan Policies 2.3-2 and 2.3-3, which encourage higher density residential uses located in proximity to commercial services, employment opportunities, and major transportation corridors and facilities, especially in the Belmont VCMU and CMU designations, compared to the proposed project. Development under Alternative 2 would also be consistent with Plan Bay Area 2040 as it would lessen displacement risk and increase mixed-use development near transit which would result in lower transportation costs from Draft Housing Opportunity Sites to local commercial, retail, and office land uses. However, this alternative would introduce both commercial and residential uses to some existing industrial-only and residential-only areas, which would slightly alter the land use character of the area. This alternative would increase housing opportunities compared to the proposed project, which would result in an increase in high-density housing per goals and policies in the General Plan Housing Element. Overall, impacts would be similar to the proposed project and would remain less than significant.

Noise

Under Alternative 2, construction durations would be longer compared to the proposed project along the El Camino Real corridor due to the increased allowable building height, resulting in increased temporary construction-related noise and vibration impacts. Long-term noise impacts resulting from building operation would be incrementally increased compared to the proposed project due to the increased number of residences. Additionally, noise related to vehicle travel would be increased since Alternative 2 would increase the total number of residents although VMT per capita would be lower than under the proposed project. Mitigation Measure NOI-1 would be required to reduce impacts related to construction vibration to less than significant levels. Overall, impacts would be slightly greater than the proposed project but would remain significant and unavoidable.

Population and Housing

Development facilitated by Alternative 2 would result in approximately 4,335 new dwelling units and approximately 10,837 new residents. Compared to the proposed project, this would result in approximately 1,035 additional dwelling units and approximately 2,587 additional residents. Development under Alternative 2 would exceed growth assumptions under the City's General Plan and Plan Bay Area 2040². This would result in approximately 2,835 additional dwelling units and 6,747 additional residents compared to projections under the City's General Plan.³ As such, similar to the proposed project, Alternative 2 would facilitate development beyond what is forecasted. Growth resulting from this alternative, identical to the proposed project, would be accommodated within the update to the 2035 General Plan to be consistent with the City's RHNA allocation and ABAG's RTP/SCS, Plan Bay Area 2050, would incorporate the project's growth. Growth result from this alternative, as in the proposed project, would therefore be anticipated and would not result in unplanned population growth. Similar to the proposed project, development under Alternative 2 would have to be submitted to the HCD to ensure it would adequately address the housing needs and demands of the City. HCD approval would ensure that the population and housing growth under the project would not be substantial or unplanned. In addition, development under Alternative 2 would not displace people or housing as it would create approximately 2,835 more dwelling units than predicted and surpass the City's RHNA. Impacts under Alternative 2 would be similar to the proposed project and would be less than significant.

Public Services and Recreation

Development facilitated by Alternative 2 would increase the demand for fire protection, police protection, schools, parks, recreational facilities, and other public facilities. This alternative would introduce more residents than the proposed project, which would result in increased demands for schools, parks, recreational facilities, libraries, and other public services. This alternative would also increase locally-serving commercial uses, which would result in an overall increase in demand for fire and police protection services. However, impacts would be reduced to less than significant through compliance with relevant General Plan Policies 6.6-1 through 6.6-11, 6.8-1, 6.8-3, and 6.8-4 and other relevant policies detailed in Section 4.13, *Public Services and Recreation*. Impacts under

² Although Plan Bay Area 2050 was adopted in October 2021, the growth projections do not include data at the city level. Therefore, this analysis relies on growth projections from Plan Bay Area 2040, which was adopted in July 2017.

³ 10,847 residents (Alternative 2 additional residents) – 4,100 residents (General Plan population growth) = 6,747 residents.

4,335 dwelling units (Alternative 2 additional dwelling units) – 1,500 dwelling units (General Plan dwelling unit growth) = 2,835 dwelling units.

Alternative 2 would be greater than the proposed project but would remain less than significant with regulatory compliance with Belmont General Plan Policies.

Transportation

Under Alternative 2, incrementally increased temporary construction-related traffic impacts would occur along the El Camino Real corridor. The addition of mixed-use development would result in lower VMT per capita along the El Camino Real corridor as compared to the proposed project (Urban Land Use Institute 2010; Spears et al. 2014). Alternative 2 would increase transit demand compared to the proposed project as it would facilitate an increased number of residents located along the El Camino Real corridor in proximity to the Belmont Caltrain station which would encourage transit ridership. Impacts would be decrease when compared to the proposed project as VMT per capita would decrease due to the increased number of people facilitated by Alternative 2 along the El Camino Real corridor near transit such as the Belmont Caltrain station (Appendix TRA). Impacts would remain less than significant.

Tribal Cultural Resources

Under Alternative 2, buildout of the Draft Housing Opportunity Sites would occur similar to the proposed project. The development facilitated by Alternative 2 would be mixed use in nature along the El Camino Real corridor. As development under Alternative 2 would encourage construction of buildings approximately 67 percent taller than those under the proposed project, deeper foundations and more excavation may be needed. However, as excavation and ground disturbance would already be needed under the proposed project, impacts on tribal cultural resources under Alternative 2 would be less than significant and similar to those under the proposed project.

Utilities and Service Systems

Development facilitated by Alternative 2 would result in an increase in demand for water, wastewater, electricity, natural gas, telecommunications, and solid waste service on Draft Housing Opportunity Sites along the El Camino Real corridor. This increase in demand would be greater than the proposed project due to the increased residences and associated population under Alternative 2. As with the proposed project, the expansion of water, wastewater, electricity, natural gas, and telecommunication infrastructure would still be required for sites where existing utility lines and connections do not already exist or are not large enough to service the Draft Housing Opportunity Sites. The required upgrades may be incrementally greater under this alternative than under the proposed project due to the increased demand for utilities and services associated with more residences and taller buildings than the proposed project; however, the sites that would receive the increased height are generally already served by such infrastructure. Taller buildings may also require additional water pressure to maintain adequate fire flows to reach the top floor of the building. Impacts would be greater than the proposed project but would remain less than significant.

Wildfire

Alternative 2 would facilitate the development of buildings on sites that are mapped within or near SRAs and fire hazard zones as shown in Figure 4.21-1 as the same number of Draft Housing Opportunity Sites would be developed under both Alternative 2 and the proposed project. Construction would require building permits and would be required to comply with applicable fire code regulations. As noted in Section 2, *Project Description*, all of the Draft Housing Opportunity

Sites are currently zoned for development. Development under Alternative 2 would not increase the likelihood of wildfire impacts occurring as the same Draft Housing Opportunity Sites which would be built under the proposed project would be built under Alternative 2. Of note, the Draft Housing Opportunity Sites which would be closest to Very High Fire Hazard Severity Zones would be located towards the western portion of the City of Belmont. The Draft Housing Opportunity Sites which would be affected by Alternative 2 along the El Camino Real corridor would not experience increased risk of wildfire impacts. Therefore, impacts would be similar to the proposed project and less than significant.

Cumulative Impacts

Based on the analysis herein, Alternative 2 would have incrementally greater impacts to aesthetics, air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services and recreation, and utilities and service systems than the proposed project. Impacts to biological resources, cultural resources, geology and soils, land use and planning, transportation, tribal cultural resources, and wildfire would be similar to or less than the proposed project. The proposed project was determined to have a cumulatively considerable contribution to cumulative impacts as discussed in Section 4, *Environmental Impact Analysis*. Because noise impacts under Alternative 2 would be similar to the proposed project or incrementally greater and significant and unavoidable in terms of noise impacts, the impact under Alternative 2 was determined to be cumulatively considerable.

6.3 Alternatives Considered but Rejected

The following summarizes those alternatives considered, but ultimately rejected for inclusion in the analysis as they would not meet most of the project objectives, would not substantially reduce impacts compared to the proposed project, or were determined to be infeasible.

1. The City considered an alternative that would reduce the number of Draft Housing Opportunity Sites. The 21 sites that would be excluded include Draft Housing Opportunity Sites that have conditions with higher wildfire risk located on sloped hillsides in less densely developed areas and in proximity to identified FHSZs. This potential alternative would eliminate Sites 72, 74, 89, 90, 98, 99, 100, 102, 103, 104, 106, 108, 110, 119, 120, 123, 125, 130, 133, 134 and 135 from the proposed project. However, these sites could already be developed with one residence under existing conditions and regulations, and the Housing Element Update would not change the development potential on these sites. Therefore, impacts would be the same as under the proposed project and this alternative would not meet the CEQA criteria of reducing or avoiding a significant impact from the project.
2. The City considered a mixed-use alternative that would allow for retail to be included as allowable uses of the ground floor of the Draft Housing Opportunity Sites along the El Camino Real corridor. This alternative would involve amending the zoning code to allow for mixed-use development to occur along the El Camino Real corridor. Current zoning designations along the El Camino Real corridor which allow mixed uses include the Corridor Mixed Use District (CMU), Harbor Industrial Area (HIA-1), Village Station Core (VSC), Village Core (VC), and Village Corridor Mixed Use (VCMU). Sites zoned Service Commercial (SC) currently do not allow mixed uses. This alternative assumes that approximately one quarter of the development proposed under the project along the El Camino Real corridor would be mixed-use, resulting in approximately 2,565 new dwelling units and 6,413 new residents. This would result in approximately 660 dwelling

units and approximately 1,650 residents fewer than would be developed under existing zoning. This pattern of development would encourage locally serving retail uses along with residences at the Draft Housing Opportunity Sites, which would reduce the VMT for residents of those sites and surrounding areas because they would live close to some commercial uses. The commercial component of this alternative would allow for commercial uses on the ground floor with up to five stories of residential uses above. The building envelopes under this alternative would be identical to those under the proposed project, as the reduction in residential square footage would be offset by the increase in commercial square footage. This alternative would provide housing development opportunities, and encourage the development of additional high-density housing, although to a lesser extent than the proposed project. While this alternative would meet the City's RHNA allocation, this alternative would not meet all of the project objectives because it would not include enough units to ensure ongoing compliance with the No Net Loss provisions of State housing law.

3. The City considered an alternative involving different housing inventory sites, which would have located housing sites near the bay. This would avoid noise impacts by relocating development away from downtown areas. However, this alternative was rejected because it would have additional significant impacts in other resource areas, especially biological resources.
4. The City considered an alternative that would require an updating to the zoning code to include requiring noise barriers to reduce construction noise for development on any Draft Housing Opportunity Site. Noise barriers would reduce on-site noise by about 10 to 20 dBA depending on construction materials and barrier height, since noise barriers are traditionally constructed of material with a minimum weight of 2 pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but are not limited to, 5/8-inch plywood, 5/8-inch-oriented strand board, or hay bales. This alternative, which would require noise barriers that would reduce construction noise, could reduce the significant construction noise impact, but would not reduce the significant and unavoidable operational noise impact. This alternative would meet project objectives to provide housing, but fewer housing units would likely be built, because development on certain sites would be infeasible due to construction cost constraints.

6.4 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative that reduces some of the project's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 6-2 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied.

Based on the analysis of alternatives in this section, the No Project Alternative is the environmentally superior alternative as it would either avoid or lessen the severity of most impacts of the proposed project. Because the No Project Alternative would not generate new population within the City above existing buildout projections, impacts to population and housing, public services and recreation, and utilities and service systems would be eliminated. In addition, significant but mitigable impacts related to aesthetics, air quality, and noise would be reduced compared to the proposed project. However, this alternative would not meet the project objectives, as it would not increase the opportunities or encourage the development of housing in the City.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* Section 15126.6[e]). Of the other alternatives evaluated in this EIR, the proposed project would be the environmentally superior alternative.

The proposed project is the environmentally superior alternative as it would either avoid or lessen the severity of most impacts of the proposed project. The proposed project would meet all four of the project objectives identified in Section 2, *Project Description*, as it would provide a framework for accommodating a total of 3,200 units at all levels of affordability within access to transit, Downtown jobs, services, and open spaces; plan for a buffer of approximately 1,415 units to ensure ongoing compliance with the No Net Loss provision of State housing law; be consistent with the City's expectation for growth forecasts to exceed those in its 2021 General Plan and Belmont Village Specific Plan by 2022; and anticipate better zoning utilization efforts targeted along the entire El Camino Real corridor.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Increased Density/Height
Aesthetics	LTSM	+	-
Air Quality	LTSM	+	+
Biological Resources	LTS	=	=
Cultural Resources	LTS	=	=
Energy	LTS	+	+
Geology and Soils	LTS	=	=
Greenhouse Gas Emissions	LTS	+	+
Hazards and Hazardous Materials	LTS	=	-
Hydrology and Water Quality	LTS	+	=
Land Use and Planning	LTS	=	=
Noise	SU	=	+
Population and Housing	LTS	+	=
Public Services and Recreation	LTS	+	-
Transportation	LTS	+	+
Tribal Cultural Resources	LTS	=	=
Utilities and Service Systems	LTS	+	-
Wildfire	LTS	=	=

NI = No Impact; LTS = Less than Significant; LTSM = Less than Significant with Mitigation; SU = Significant and Unavoidable
 + Superior to the proposed project (reduced level of impact)
 - Inferior to the proposed project (increased level of impact)
 = Similar level of impact to the proposed project

The No Project Alternative would generally result in similar or decreased environmental impacts compared to the proposed project. By reducing the number of Draft Housing Opportunity Sites, this alternative would reduce impacts related to aesthetics, air quality, biological resources, energy,

GHG emissions, hydrology and water quality, noise, population and housing, public services and recreation, transportation, and utilities and service systems. The No Project Alternative would have similar impact levels to the proposed project related to cultural resources, geology and soils, hazards and hazardous materials, land use and planning, tribal cultural resources, and wildfire impacts. However, this alternative would not meet the project objectives, as it would not increase the opportunities or encourage the development of housing in the City of Belmont.

Alternative 2, Increased Density/Height, would generally result in similar or incrementally increased environmental impacts compared to the proposed project. By allowing for commercial land uses alongside residential uses, this alternative would reduce VMT per capita; however, due to the increase in population and increased building height and envelope, would create greater impacts to aesthetics, hazards and hazardous materials, noise, public services and recreation, and utilities and service systems compared to the proposed project.

7 References

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7.2 List of Preparers

This EIR was prepared by the City of Belmont, with the assistance of Rincon Consultants, Inc., W-Trans and Kittelson & Associates, Inc. Consultant staff involved in the preparation of the EIR are listed below.

RINCON CONSULTANTS, INC.

Abe Leider, AICP, Principal
Darcy Kremin, AICP, Project Manager
Katherine Green, AICP, Deputy Project Manager
April Durham, PhD, Environmental Planner
Jesse Voremberg, Environmental Planner
Beth Wilson, Biologist
Amanda Harvey, PhD, RPA, Senior Archaeologist
Derek Reaux, Archaeologist
Ryan Glenn, Archaeologist
Jake Nyiri, Environmental Scientist
Leslie Trejo, Environmental Planner
Nichole Yee, Environmental Planner
Nicole Shimizu, Environmental Planner
Audrey Brown, GIS Analyst
Allysen Valencia, GIS Analyst

W-TRANS

Mark Spencer, PE, Senior Principal
Barry Bergman, AICP, Senior Planner

KITTELSON & ASSOCIATES, INC.

Damian Stefanakis, Principal Planner
Anusha Musunuru, PhD, Engineering Associate

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