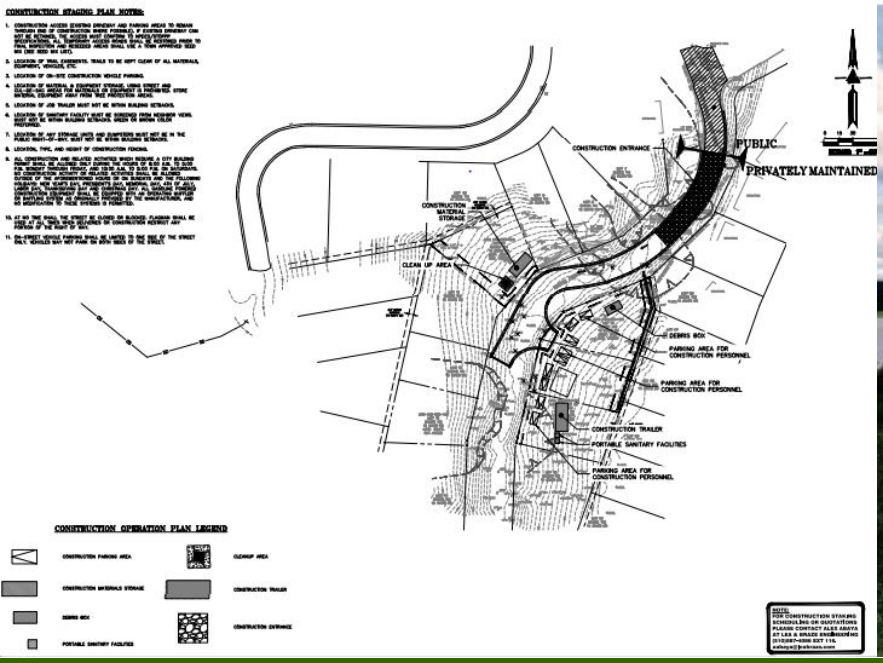

City of Belmont

Monte Cresta Drive Extension Project

Draft Initial Study/Mitigated Negative Declaration

July 2022

717 Market Street, Suite 400
San Francisco, CA 94103
650-373-1200
www.panoramaenv.com

PANORAMA ENVIRONMENTAL, INC.

City of Belmont

Monte Cresta Drive Extension Project

Draft Initial Study/Mitigated Negative Declaration

July 2022

Prepared for:
City of Belmont
Community Development Department
1 Twin Pines Ln, Suite 110
Belmont, CA 9400

Prepared by:
Panorama Environmental, Inc.
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PANORAMA ENVIRONMENTAL, INC.

Table of Contents

List of Tables

List of Figures

List of Appendices

Mitigated Negative Declaration

Project Summary

1. **Project Title**
   Monte Cresta Drive Extension Project
2. **Lead Agency Name and Address**
   City of Belmont
   Community Development Department
   1 Twin Pines Ln, Suite 110
   Belmont, CA 9400
3. **Contact Person and Phone Number**
   Rob D. Gill, Senior Planner
   Community Development Department
   (650) 598-4204 x4204 rgill@belmont.gov
4. **Project Location**
   The Project is located in a developed residential neighborhood in the City of Belmont in San Mateo County. The proposed project is located south of the intersection of Monte Cresta Drive and Sequoia Way at the top of a northwest-facing slope overlooking San Juan Canyon.
5. **Project Sponsor's Name and Address**
   Meng Huang
   226 Coleman Street
   San Francisco, California 94124
6. **General Plan Designation and Zoning**
   The project site has a land use designation of Hillside Residential Open Space (HRO) and zoning designation of Hillside Residential & Open Space, Subdivided (HRO2). The parcels adjacent to the project site are designated HRO and Residential Low Density (RES-L) and zoned HRO2 and Single Family Residential, 6000 sq. ft./D.U. (R1B). The project site is located within the Measure F Overlay.
7. **Description of Project**
   The City of Belmont has received an application from Meng Huang (applicant) for the Monte Cresta Drive Extension Project (project), which would extend Monte Cresta Drive by 335 feet from its existing terminus at Monte Cresta Drive and Sequoia Way. The Monte Cresta Drive extension would provide access to five unimproved parcels, Assessor's Parcel Numbers (APNs) 043-234-170 (Lot 21), 043-234-210 (Lot 19/20), 043-232-090 (Lot 10), 043-232-130 (Lot 11/12) and 043-232-270 (Lot 7). The extension of Monte Cresta Drive would allow future development of single-family homes on the five undeveloped parcels.

8. **Surrounding Land Uses and Setting**
   The lands north, west, and east of the project are developed with single family residences. The project site and lands south of the project are undeveloped.
9. **Other Public Agencies Whose Approval is Required**
   Regional Water Quality Control Board - National Pollutant Discharge Elimination System Construction General Permit
10. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**
    No Native American tribes have requested consultation.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the project, but impacts would be mitigated to a less-than-significant level as indicated in the Initial Study.

☐ Aesthetics	☐ Agricultural and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy Use
☒ Geology and Soils	☐ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Utilities and Service Systems
☒ Tribal Cultural Resources	☒ Wildfire	☐ Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒

I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the Project MAY have a "potentially significant impact" or "potentially significant impact unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required. ☐

Pursuant to Section 21082.1 of the California Environmental Quality Act, the City of Belmont (City) has independently reviewed and analyzed the Initial Study and Mitigated Negative Declaration for the proposed project and finds that the Initial Study and Mitigated Negative Declaration reflect the independent judgement of City. The City further finds that the project mitigation measures shall be implemented as stated in this Mitigated Negative Declaration.

I hereby approve this project:

Rob D. Gill, Senior Planner for Carlos de Melo, CDD	8/1/22
Signature Name/Title	Date

City of Belmont, Community Development Director

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1 Project Description

1.1 Overview

The City of Belmont (City) has received an application from Meng Huang (applicant) for the Monte Cresta Drive Extension Project (project), which would extend Monte Cresta Drive by 335 feet from its existing terminus at Monte Cresta Drive and Sequoia Way. The Monte Cresta Drive extension would provide access to five unimproved parcels, Assessor's Parcel Numbers (APNs) 043-234-170 (Lot 21), 043-234-210 (Lot 19/20), 043-232-090 (Lot 10), 043-232-130 (Lot 11/12) and 043-232-270 (Lot 7). The extension of Monte Cresta Drive would allow future development of single-family homes on the five undeveloped parcels. The roadway segment would comply with City of Belmont Municipal Code Sec. 7-13 and Americans with Disabilities Act (ADA) requirements to ensure the roadway meets city road design standards and provides adequate access to pedestrians and those with disabilities. The project would also comply with the policies and goals of the San Juan Hills Area Plan.

1.2 Project Location and Site Description

The project is located in a developed residential neighborhood in the City of Belmont in San Mateo County, as shown on Figure 1 and Figure 2. The proposed project is located south of the intersection of Monte Cresta Drive and Sequoia Way at the top of a northwest-facing slope overlooking San Juan Canyon. The lands north, west, and east of the project are developed with single family residences.

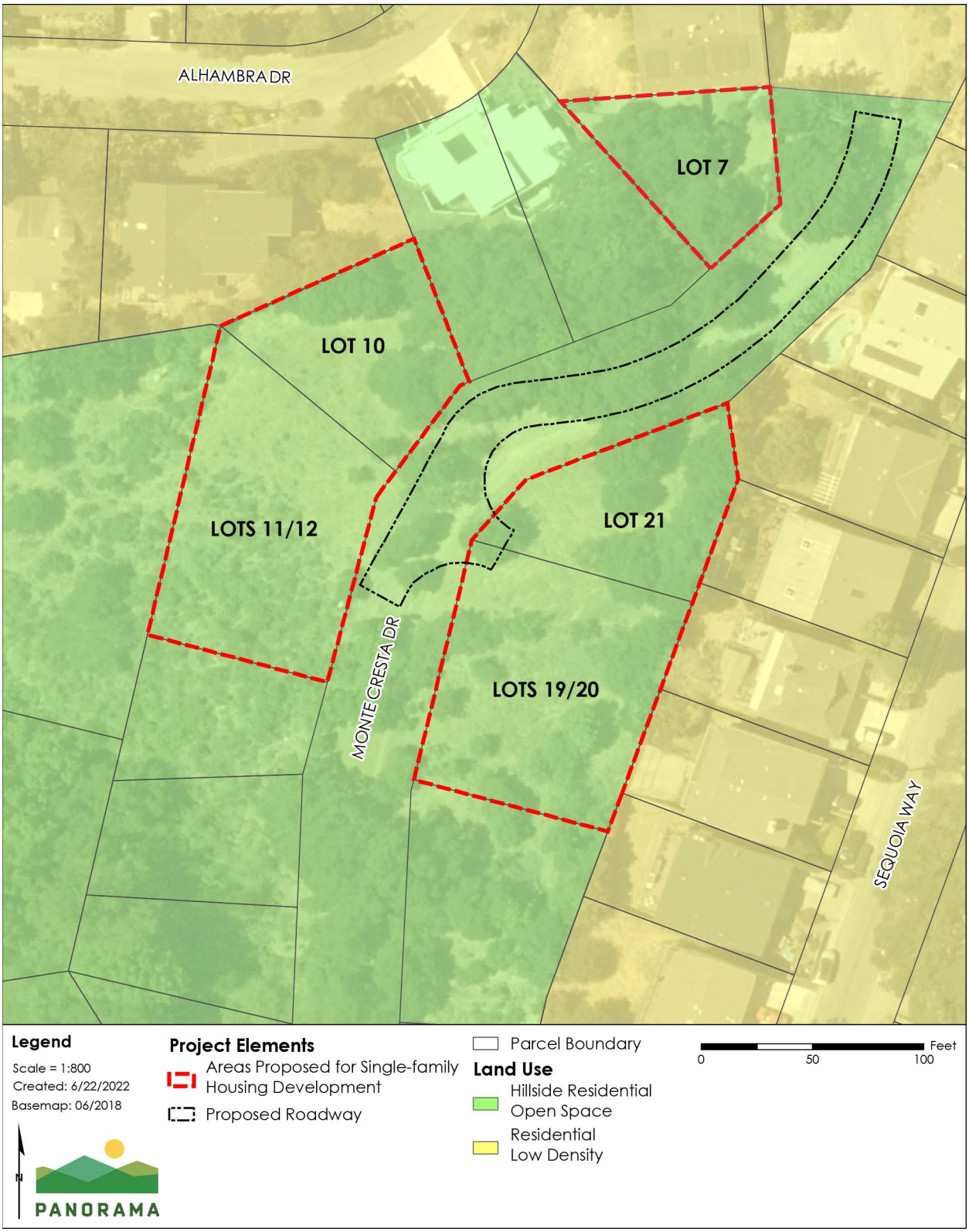
The project site and lands south of the project are undeveloped. The project location includes an unimproved roadway primarily used by local residents as an open space recreational trail that begins at the terminus of Monte Cresta Drive and continues south along the general alignment of the roadway extension. The unimproved roadway was originally graded during the 1930s by cutting and filling along a moderately to steeply sloping hillside. The ground adjacent to the unimproved roadway along the majority of the proposed project alignment slopes down to the west and northwest at inclinations ranging from 1.5:1 to 3:1 (horizontal:vertical).

1.2.1 Overview

The proposed project involves the extension of Monte Cresta Drive by 335 feet along the alignment of the existing unimproved roadway. This section provides a detailed description of the proposed project, including the design of the road, retaining walls, and site drainage. Figure 3 shows the proposed project design details.

Figure 1 Regional Location

Figure 2 Land Use Designation



1.2.2 Land Use Designations

The project site has a General Plan (GP) land use designation of Hillside Residential Open Space (HRO) and zoning designation of Hillside Residential & Open Space, Subdivided (HRO2). The parcels adjacent to the project site are GP designated as HRO and Residential Low Density (RES-L) and zoned HRO2 and Single Family Residential, 6000 sq. ft./D.U. (R1B). The project site is located within the Measure F Overlay Zone. Refer to Figure 2.

1.3 Project Components

1.3.1 Project Elements

Extended Roadway

The roadway segment would comply with City of Belmont Municipal Code Sec. 7-13 and ADA requirements to ensure the roadway meets City road design standards and provides adequate access to pedestrians and those with disabilities. The project would also comply with the policies and goals of the San Juan Hills Area Plan.

Per the City of Belmont City Code Sec. 7-13 (e)(5), hillside roads are required to include two traffic lanes, and gutters, curbs, parking lanes and sidewalks on both sides of the road for a paved width of 41 feet. The extension of Monte Cresta Drive would consist of two 10-foot travel lanes and 2-foot curbs and gutters on either side of the roadway for a total paved road width of 24 feet. The proposed project does not include any on-street parking or sidewalks due to the hill slope and complex geological conditions on the project site. The project requires an exemption because the road as proposed does not meet current City design standards.

Sec. 7-13 (e)(7) states that an exception may be granted upon recommendation of the City engineer based on consultation with the fire chief and appropriate engineering evaluations. An exemption may be granted if the City engineer determines that the road would not unduly impair safety and emergency access. It must also be proven that the reduction in design standards is necessary to avoid excessive grading or vegetation removal or to reduce the risk of erosion, flooding, or slope failure.

The road must also be consistent with the San Juan Hills Area Plan and other City ordinances. The San Juan Area Plan and City Code 7-13 (e)(9) specifies the requirements for an unimproved road segment. There are two types of plans required: entire unimproved roadway and unimproved road segment. A road segment was warranted for the project based on geotechnical constraints of the site, such as steep slopes and past evidence of landslides. Refer to the discussion in Section 2.2.7, Geology and Soils, below for more information.

Two fire hydrants would be installed along the roadway extension and a hammerhead turn-around would be constructed at the proposed terminus of Monte Cresta Drive for fire truck access and turn around. The rough-graded road subgrade would consist of clayey fill, clayey fill mixed with rock debris, pulverized sandstone, and/or in-place sandstone bedrock. The

proposed road extension would consist of a compacted subgrade overlain by aggregate and concrete asphalt. The thickness of the concrete asphalt and aggregate base would range from 5 to 14 inches depending on the subgrade condition.

Retaining Walls

Retaining walls would be constructed on the upslope (east) and downslope (west) sides of the proposed road extension. The retaining walls would consist of concrete or wood depending on the location. Retaining walls that flank the roadway would be approximately 3 to 6 feet in height. The maximum height of the retaining walls would be 6 feet at the hammerhead turn-around near the proposed southern road terminus. Structural design for the retaining walls would be provided prior to issuance of the grading permit.

Stormwater Drainage System

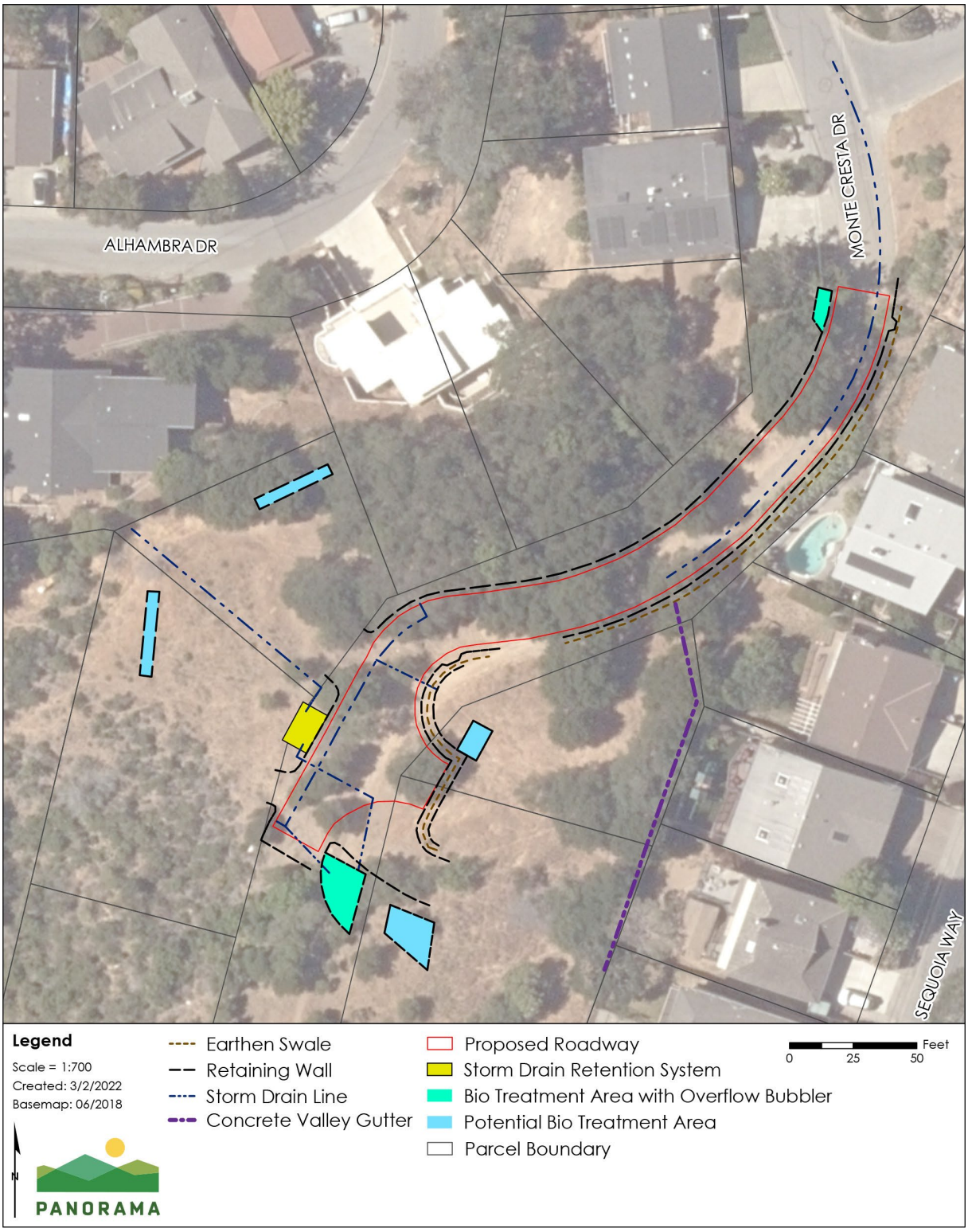
Stormwater runoff from the road extension and adjacent residential parcels would be treated on site prior to being released to a new stormwater retention system. The stormwater retention system would include two 15-foot-long 36-inch storage pipelines to control storm water runoff that would connect to the existing City storm drain on Alhambra Drive via a new 10-foot easement within Lot 10 and an existing 5-foot easement on the neighboring property (Lots 44, 45, and 46). The runoff is collected and discharged to the existing City storm drain on Alhambra Drive which connects to the corrugated pipe that daylights along the downhill slope after Alhambra Drive. The runoff is then diverted along the undeveloped swale to the existing headwall located at the rear of 3311 Bay Court.

Stormwater would be treated in flow-through bio-retention planters: one planter would be located at the beginning of the road extension of the western side of the roadway, and a second planter would be located at the terminus of the road extension on the eastern side of the roadway. The planter treatment areas would be 65 square feet and 304 square feet for the western planter and eastern planter, respectively. The planters would consist of concrete walls with a 12-inch deep permeable rock base that would be overlain with an 18-inch deep biotreatment soil layer. An earthen swale would be constructed on the eastern side of the roadway to capture runoff from Lot 21 and 20. The swale would direct runoff from existing residences along Sequoia Way to be treated at the beginning of the proposed roadway extension and drained towards Highgate Avenue.

Sewer System

Wastewater from the existing site is currently not conveyed to the City's public sewer system. The project would include a new 6-inch lateral and point of connection to the existing sewer system. The proposed connection would be made by extending 250 linear feet into an existing sewer manhole.

Figure 3 Road Extension Design Plans



Source: (Lea & Braze Engineering Inc., 2018)

Utility Extensions

Water, sewer, electricity, cable, and telephone lines would be extended along Monte Cresta Drive to provide service to the residential parcels. All utility extensions would be located underground and within the road right-of-way. All new storm drain and sewer laterals and associated structures would be public, but privately maintained by the homeowner association (HOA). The providers of utilities and public services for the project are summarized in Table 1-1.

Table 1-1 Utility Providers

Utilities and Public Services	Services Providers
Water	Mid-Peninsula Water District
Sewer	City of Belmont
Electric	PG&E
Telecommunication	AT&T and Comcast
Stormwater	City of Belmont

Financing Plan

Section 7-3(e)(12) of the Belmont City Code authorizes the City to enter into a reimbursement agreement to achieve cost sharing for roadway improvements among the benefiting property owners. The applicant proposes to defer the Reimbursement Agreement Application until after the approval of the plan but prior to construction. The applicant would finance and complete the road segment prior to construction of the first house. It is anticipated construction of the road segment would be completed within two years of planning approval. The project's Financing Plan would comply with Policy 10 of the San Juan Hill Area Plans.

1.4 Project Construction

1.4.1 Site Preparation

The project is located within an undeveloped area containing non-native annual grasslands, foothill needlegrass grassland, oak woodland, and ornamental vegetation. All vegetation within the area of the road extension and construction access areas would be removed at the start of construction. Approximately 19 trees would be removed (Table 1-2). The trees to be removed for project construction are shown in Figure 4.

The project includes a tree planting plan to that would provide replacement planting of coast live oak (*Quercus agrifolia*) trees (refer to Appendix E for the planting plan showing the location of proposed coast live oak trees). A total of thirteen coast live oaks would be planted within the project site.

Table 1-2 Proposed Project Tree Removal

Tree Number	Species	Diameter at Breast Height (inches)
6	Coast live oak	16.4
7	Coast live oak	20.1
9	Coast live oak	24.4
12	Coast live oak	18.1
19A	Coast live oak (dead)	7.5
24	Coast live oak	8.8
25	Coast live oak	10.9, 8.9[a]
26	Toyon	4.8, 6.3[a]
27	Coast live oak	7.2
28	Toyon	6.5
28A	Toyon	10
28B	Toyon	12
29	Toyon	4.1, 8.7[a]
52	Coast live oak	16.3
55	Toyon	6
56	Coast live oak	12.3
57	Toyon	8
59	Coast live oak	7.7
68	Coast live oak	11.8, 11.0[a]

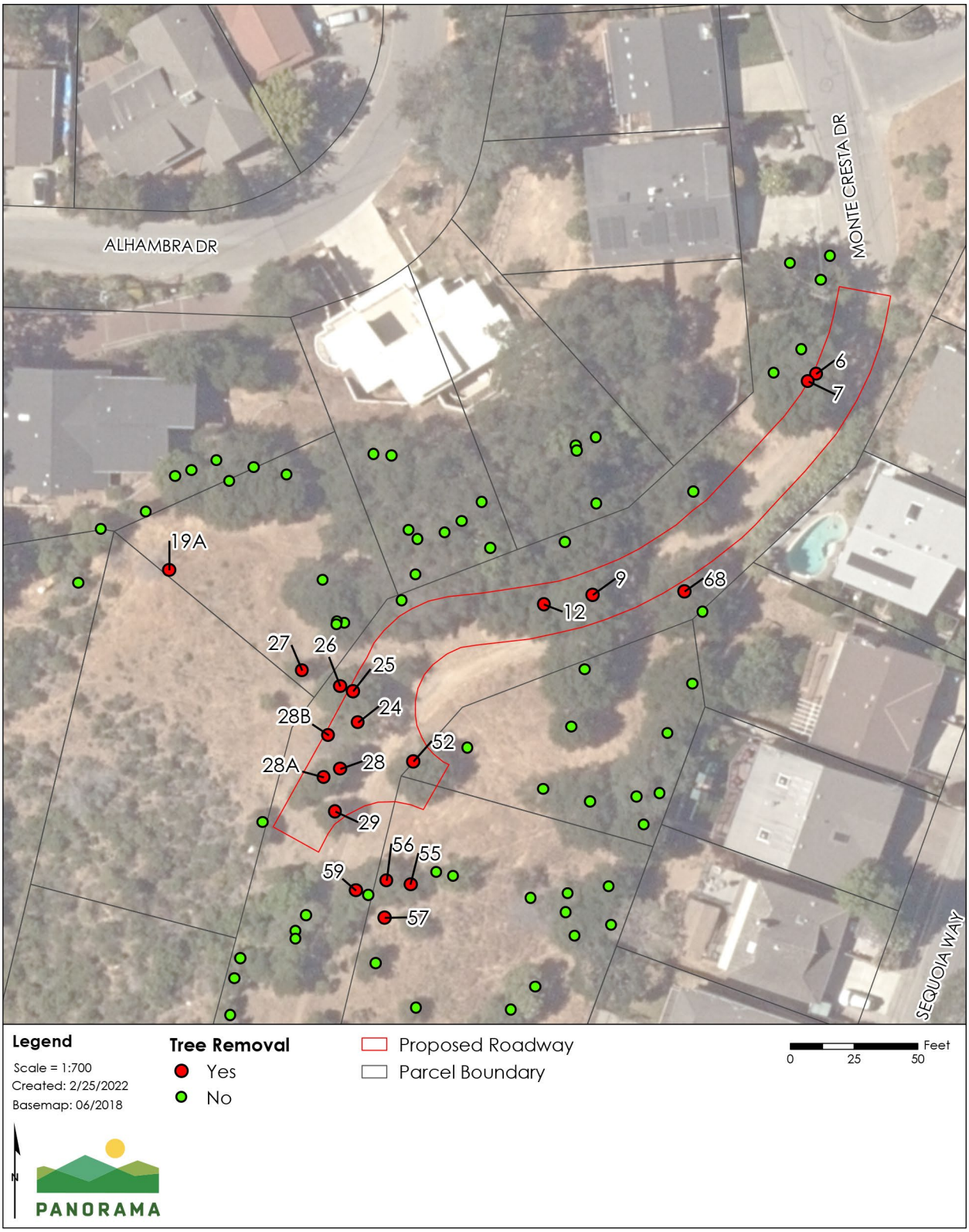
[a] Codominant at base – multistem tree

Source: (Kielty Arborist Services, 2018)

1.4.2 Land Ownership and Easements

All lots proposed for residential development are privately owned. The public easement for Monte Cresta Drive would be 50 feet wide to account for two 10-foot travel lanes and 2-foot curbs and gutters on either side of the roadway for a total paved road width of 24 feet. Additional public easements would be located on parcels 043-232-090, 040-234-210, and 043-234-170 for stormwater infrastructure.

Figure 4 Tree Location Map



Source: (Kielty Arborist Services, 2018)

1.4.3 Construction Staging Areas

Equipment and vehicle staging would occur within private parcels east of the Monte Cresta Drive extension (Lots 19/20, and 21) and west of Monte Cresta Drive at Lot 10. Areas for construction staging would be graded and cleared of vegetation at the start of construction. Vehicle parking for construction personnel would occur on areas east of the Monte Cresta Drive extension within Lots 19/ 20, and 21. A construction trailer and portable sanitary facilities would be staged on Lot 19/20. A debris box would be placed on Lot 21 during construction.

1.4.4 Grading

The project would require grading to construct the roadway and flat areas for construction access and staging. Approximately 815 cubic yards of material would be excavated from the area to construct a flat road surface. Approximately 225 cubic yards of aggregate and asphalt material and excavated soils would be imported for roadway construction. Approximately 590 cubic yards of excess soil material would be exported from the project site.

1.4.5 Stormwater Facilities and Utilities

Trenches would be excavated for the stormwater pipelines, stormwater planters, and underground utilities. The pipelines would be installed within the trench and the trench would be backfilled with native soil material to meet finished grade. Permeable rock and biotreatment soil would be installed within the planters, and supplemented with vegetation for water quality treatment.

1.4.6 Road Paving and Concrete Pouring

The extended roadway would be paved using aggregate base overtopped with asphalt concrete. Typical paving equipment would be used to pave the roadway, including dump trucks, a paver, and compaction rollers to compact the aggregate base and asphalt. A form would be constructed for the concrete curb and gutter. Concrete would be poured into the form and cured.

1.4.7 Personnel, Equipment, and Construction Schedule

Typical construction activities would occur between 8:00 a.m. to 5:00 p.m. Monday through Friday. If Saturday work is required, construction activities would occur between 10:00 a.m. to 5:00 p.m. The type of equipment required for construction of the proposed project would include, but not be limited to the following:

- Grader
- Fork lift
- Generator
- Trencher
- Roller
- Paver
- Sweepers
- Concrete trucks and pump
- Excavator
- Personal trucks and vehicles
- Dump truck
- Water truck

An average of 6 to 10 construction workers are expected to be on site daily during construction (see Table 1-3), with a maximum crew size of 20 workers on site at any one time. Should project entitlements/CEQA clearance be secured, project construction is anticipated to begin in 2023. Construction of the project would take approximately 9 months to complete.

Table 1-3 Proposed Construction Schedule

Construction Phase	Average Number of Workers	Duration (Work Days)	Timing
Site Preparation	10	45	March 2023 to May 2023
Grading and Trenching	10	30	May 2023 to June 2023
Facility Construction and Installation	6	60	August 2023 to October 2023
Paving	8	30	October 2023 to November 2023

1.5 Residential Development

The extension of Monte Cresta Drive would provide access to five parcels that may be developed with single-family homes in the future after the roadway and utility improvements have been constructed. Preliminary site plans for the single-family residences proposed on Lots 10, 21, and 19/20 are provided in Figure 5 through Figure 7. The design specifications for the single-family residence on Lot 7 and Lot 11/12 has not been developed. However, the proposed project would comply with City of Belmont Design Guidelines (2016) and Zoning Code section 4.7, which specifies the design requirements for single-family residences in the Hillside Residential and Open Space (HRO2) zoning district[1] (City of Belmont, 2020). The new residences would also be required to comply with the City of Belmont Residential Design Criteria (RDC) if the new construction (City of Belmont, 2016):

11. ground floor plate height exceeds 12 feet and roof height exceeds 18 feet (as measured from finished grade), or
12. creates or expands an upper floor.

The RDC is a companion document to the City of Belmont Zoning Ordinance that establishes objective, measurable, or quantifiable criteria (standards) for single-family residential development. The proposed residences would be required to employ one or

[1] HRO2 districts provide unique terrain features and add substantially to the character of the area, that the location and visibility of development affects the visual quality of the environment, and hillside development should preserve the natural terrain while providing a density of residential development compatible with the limitations of slope on the development site.

more RDC standards (i.e., daylight planes, prescribed articulation, and second story stepbacks).

The proposed single-family residences would be two-story structures with concrete retaining walls and driveways that extend out to the proposed roadway as shown in the preliminary design renderings. The buildings would be constructed in a contemporary architectural style. The building information for Lots 10, 21, and 19/20 is presented in Table 1-4.

Table 1-4 Preliminary Building Information

Lot	Building Size	Number of Stories
Lot 10	3,496 square feet	2
Lot 19/20	3,499 square feet	2 + basement
Lot 21	3,482 square feet	2 + basement

Figure 5 Lot 10 Site Plan

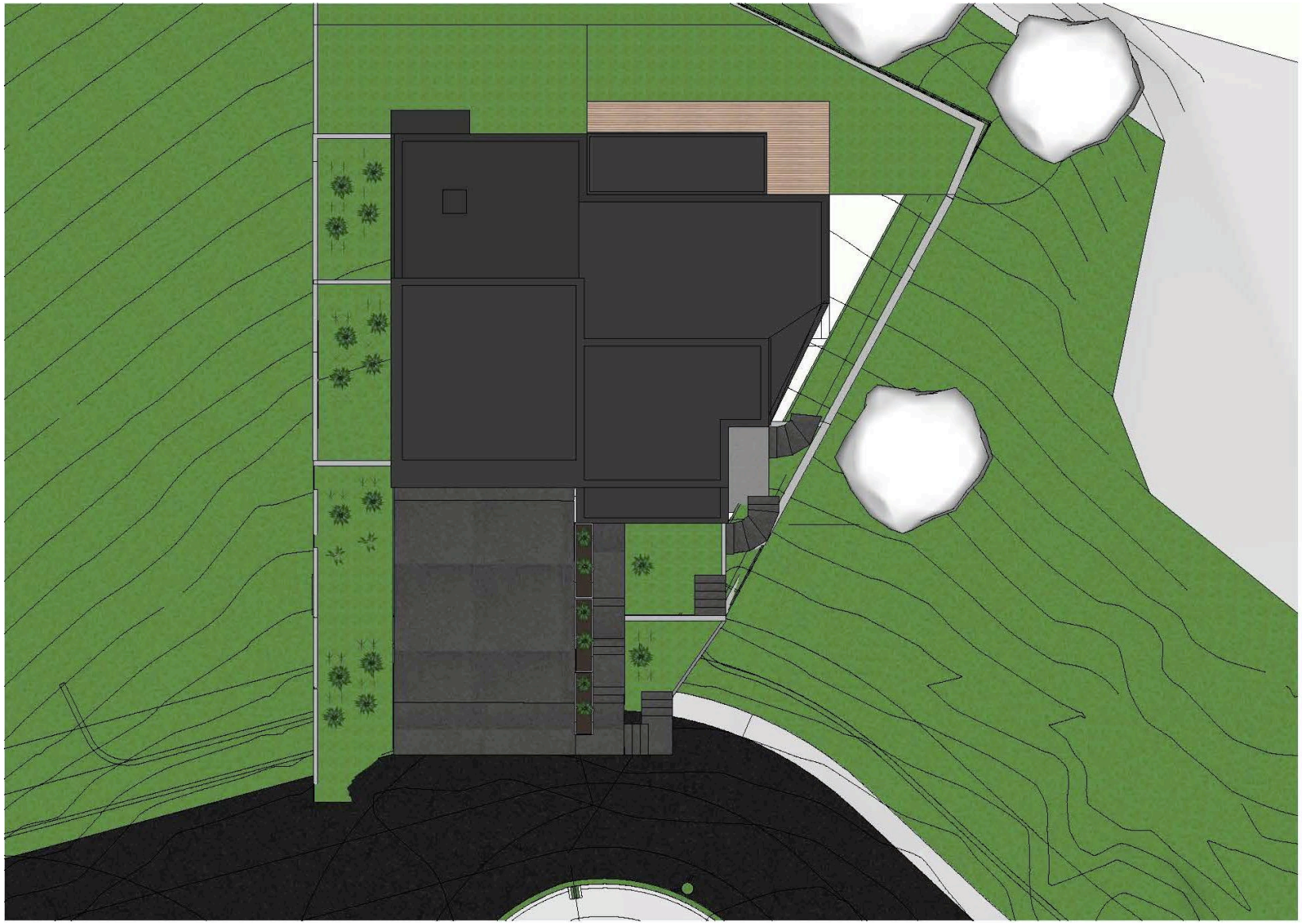


Figure 6 Lot 19/20 Site Plans

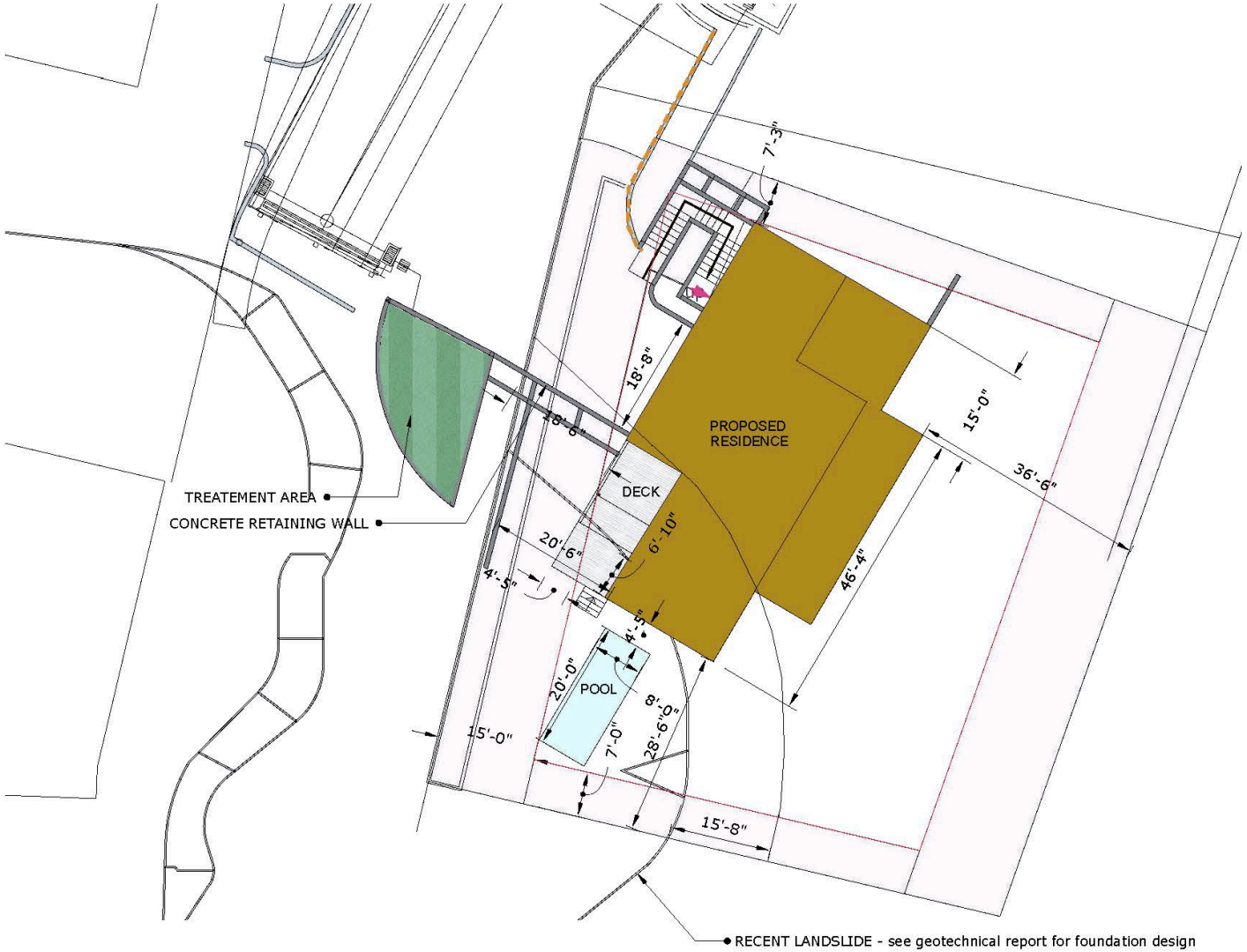
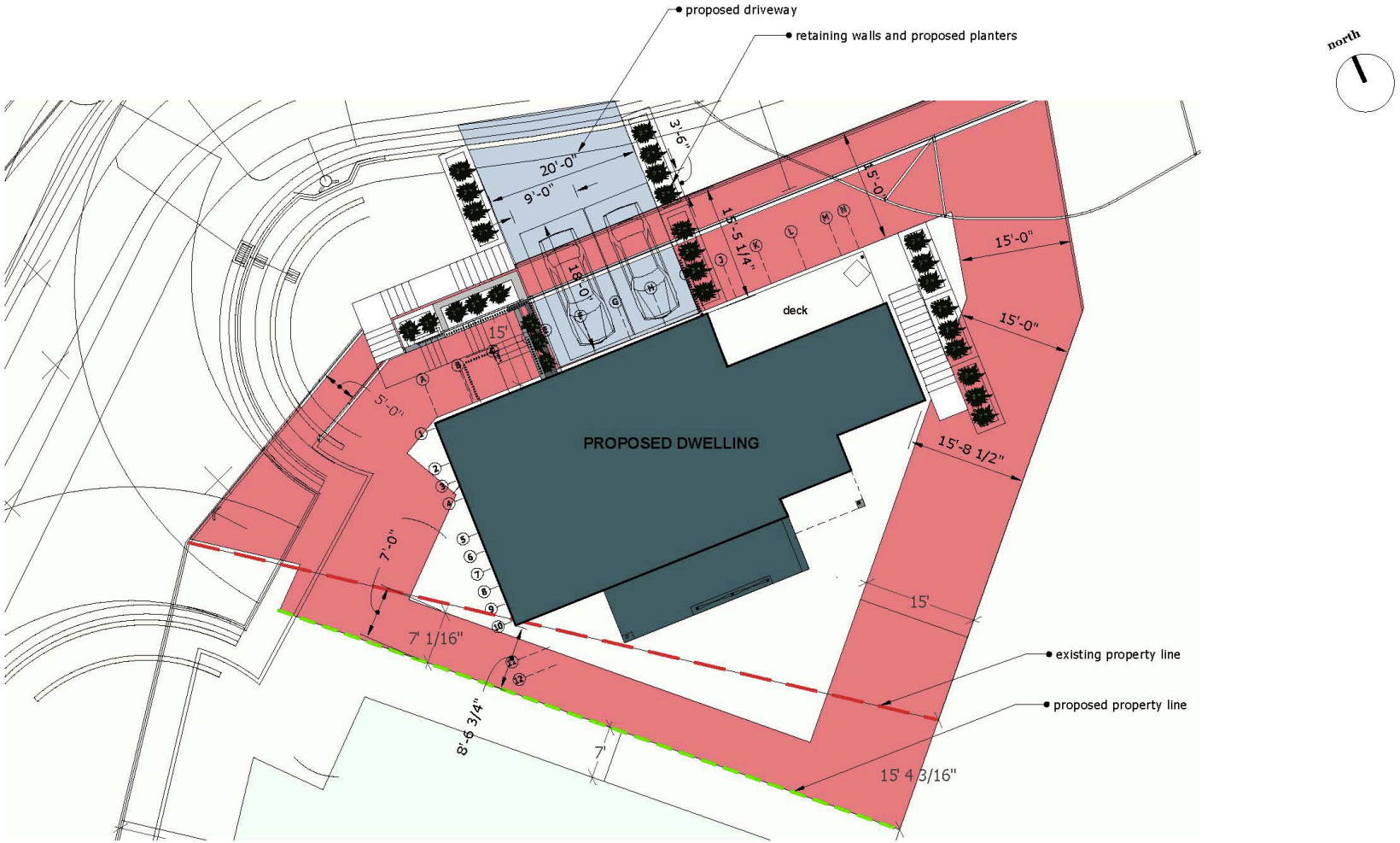


Figure 7 Lot 21 Site Plan



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2 Environmental Checklist

2.1 Approach to Environmental Analysis

This IS checklist evaluates the potential environmental impacts of the project. The level of significance for each resource topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are evaluated in this IS checklist:

No Impact. The project would not have the impact described. The project may have a beneficial effect, but there is no potential for the project to create or compound the impact described.

Less Than Significant Impact. The project would have the impact described, but the impact would not be significant. Mitigation is not required; however, the project applicant may choose to modify the project to avoid the impacts.

Less Than Significant with Mitigation. The project would have the impact described, and the impact could be significant. One or more mitigation measures have been identified that will reduce the impact to a less-than-significant level.

Potentially Significant Impact. The project would have the impact described, and the impact could be significant. The impact cannot be reduced to a less-than-significant level by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Resource topics that would have no impact as a result of the project are not discussed beyond the resource checklist.

2.2 Environmental Analysis

2.2.1 Aesthetics

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c) 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 publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Setting

The study area for the analysis of aesthetic resources includes areas with views of the project site. The project area contains a number of trees and a hill slope that generally blocks views of the proposed access road from the surrounding area, with the exception of a portion of the proposed roadway extension that is visible from the existing terminus of Monte Cresta Road. The project area would also be visible from surrounding residences, including residential areas on Alhambra Drive, Monte Cresta Drive, and Sequoia Way.

Discussion

A) No Impact

A scenic vista is an area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, State, or local agency. The City has not designated an official scenic vista within in the city limits. However, the General Plan contains policies and goals intended to protect scenic resources.

Construction and operation of the project, including the roadway and potential future residential development, would not have a substantial adverse effect on a scenic vista because the project site is located within an established residential neighborhood surrounded by low-density residences and rolling foothills. Neither the roadway nor potential future development would be visible from any scenic vista nor would the project block views of a scenic vista. Therefore, impacts would be less than significant.

B) No Impact

No State scenic highway traverses the project site nor is the project site in the vicinity of a State scenic highway. The nearest State scenic highway is SR-280, located approximately 1.6 miles west of the project site. Due to distance, development, and intervening topography, the project would not be visible from this State scenic highway. Because the project would not be visible from a State scenic highway, the project would have no impact on scenic resources within any State scenic highway.

C) Less than Significant Impact

The project site is located an urbanized area in a developed residential neighborhood in the city, as shown in Figure 1 and Figure 2. The lands north, west, and east of the project are developed with single family residences. The project site and lands south of the project are undeveloped. The project site has a GP land use designation of HRO and zoning designation of HRO2. The parcels adjacent to the project site are GP designated HRO and RES-L and zoned HRO2 and R1B.

Due to topography and adjacent residential development, the only publicly accessible areas where the project would be visible include the existing terminus of Monte Cresta Drive and potentially the terminus of Alhambra Drive. Because the project site is located in an urbanized area, potential impacts on visual quality are determined on the basis of whether the project would conflict with applicable zoning and other regulations governing scenic quality.

Road and Utilities Extension

The proposed utilities would be below grade and would not be visible following construction. The proposed road extension and retaining walls have been designed consistent with City of Belmont guidelines for roadways and standards for development within the area. The retaining walls and roadway extension would be topographically inferior to residences located adjacent to and above the project site and would not affect views of the surrounding area.

Future Development of Adjacent Parcels

Preliminary site plans for the single-family residences proposed on Lots 10, 21, and 19/20 are provided in Figure 5 through Figure 7. The design specifications for the single-family residence on Lot 11/12 have not been developed. The proposed project, including any future development, would need to be compatible with the underlying zoning and land use designations. Future residential development would comply with City of Belmont Design Guidelines (2016), and City of Belmont Zoning Code, Section 4.7, which specifies the design

requirements for single-family residences in the HRO2 zoning district[2] (City of Belmont, 2020). The new residences would also be required to comply with the City of Belmont RDC. The City's General Plan contains several policies regarding the preservation of scenic quality and resources. The City would review individual development plans to ensure consistency with the General Plan and zoning, including policies for scenic quality. Therefore, impacts would be less than significant.

D) Less than Significant Impact

Road and Utilities Extension

Construction of the project would primarily occur Monday through Friday from 8:00 a.m. to 5:00 p.m., and construction would last approximately 9 months. Lighting of construction work areas may be used during the morning or evening hours of construction for safety and security of personnel, particularly during the winter months, when natural light is limited. Given the limited time that light sources would be utilized and that construction would be temporary, project construction is not anticipated to produce a substantial source of light and glare. As shown in Figure 2, residential properties on Sequoia Way and Alhambra Ave are immediately adjacent to the project site. The surrounding residences may be subjected to potential brief use of lighting during construction during winter months. The temporary use of lighting during construction would not be substantial and would be less than significant.

The road extension does not include any permanent source of lighting or components that would produce glare. No permanent lighting or glare impacts are anticipated to occur.

Future Development of Adjacent Parcels

Construction of the residences in the future are likely to include new sources of nighttime light and would likely include windows and other minor sources of daytime glare. General Plan Policy 2.13-4 requires that light and glare are minimized; Policy 5.3-6 requires developers to use design features to avoid light pollution and glare. The City of Belmont Climate Action Plan (CAP) Measure EM-1 also requires use of efficient lighting in new development. The future residential development would be reviewed by the City for compatibility with the General Plan policies and would ensure that light and glare are minimized. In addition, development of the vacant parcels with residences would result in light and glare that would be similar to and consistent with nearby light sources in the surrounding residential neighborhood. Because the future development would need to be consistent with the General Plan policies and CAP measures, including measures for reduction of light and glare, impacts from future development would be less than significant.

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[2] HRO2 districts provide unique terrain features and add substantially to the character of the area, that the location and visibility of development affects the visual quality of the environment, and hillside development should preserve the natural terrain while providing a density of residential development compatible with the limitations of slope on the development site.

2.2.2 Agriculture and Forestry

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) 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])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒

Environmental Setting

The project is located in a developed residential neighborhood in the City, as shown in Figure 1 and Figure 2. The lands north, west, and east of the project are developed with single family residences. The project site and lands south of the project are undeveloped. The project site is GP designated HRO2. The project site has a GP land use designation of HRO and zoning designation of HRO2. The parcels adjacent to the project site are GP designated HRO and RES-L and zoned HRO2 and R1B. There are no lands designated as Farmland, zoned for agriculture, under Williamson Act Contracts, or zoned as Timberland on or near the project site.

Discussion

A) No Impact

No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) is designated within the project site. The project would not convert any designated Farmland to nonagricultural use. No impact would occur.

B) No Impact

The project site is not located within land under a Williamson Act contract or lands zoned for agricultural production. No impact would occur.

C) No Impact

No land within the project area is zoned as forest land, Timberland, or a Timberland Production Zone within the project site. The project would not conflict with zoning for forest land. No impact would occur.

D) No Impact

The project is located in a developed residential neighborhood, and the surrounding parcels are GP designated HRO and RES-L. The project site does not contain forest land, and the project would therefore not impact forest land.

E) No Impact

The project would not involve changes that would result in loss of forest land or conversion of forest land to non-forest use, or conversion of Farmland to non-agricultural use. The project site does not occur on forest land or Farmland. No impact would occur.

2.2.3 Air Quality

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) 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?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Overview
The project site is located within the San Francisco Bay Area Air Basin (Air Basin), which encompasses Alameda, Contra Costa, Santa Clara, San Francisco, San Mateo, Marin, and Napa Counties as well as the southern portions of Solano and Sonoma Counties. The Air Basin is characterized by complex terrain that distorts normal wind flow patterns, consisting of coastal mountain ranges, inland valleys, and bays.

Sensitive Receptors
The Bay Area Air Quality Management District (BAAQMD) considers the relevant zone of influence for an assessment of air quality health risks to be within 1,000 feet of a project site. Numerous residential homes surround the project site, including those situated along Alhambra Drive and Sequoia Way. Cipriani Elementary School is located approximately 0.5 mile to the south of the project site.

Air Quality Health Risk Assessment
An Air Quality Technical Report was prepared for the project by RCH Group (Appendix A). The Air Quality Technical Report includes air quality modeling and a Health Risk Assessment that analyzed the incremental cancer risks to sensitive receptors in the vicinity of the project and provided a worst–case estimate of the increased exposure. The results of the air quality modeling and Health Risk Assessment are presented in the impact analysis below.

Discussion

A) Less than Significant Impact

2017 Clean Air Plan
BAAQMD adopted the 2017 Clean Air Plan/Regional Climate Protection Strategy (CAP/RCPS), which provides a roadmap for BAAQMD's efforts over the next few years to reduce air pollution and protect public health and the global climate. Measures of the 2017 CAP addressing the transportation sector are in direct support of Plan Bay Area 2040, which was prepared by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) and includes the region's Sustainable Communities Strategy and the 2040 Regional Transportation Plan.

Pursuant to CEQA Guidelines, the project would conflict with or obstruct the implementation of an applicable air quality plan if (1) the project was inconsistent with the control measures in the 2017 CAP/RCPS or the BAAQMD CEQA Air Quality Guidelines and/or (2) implementation of the project were to generate criteria pollutant or toxic air contaminant emissions that exceed the numerical thresholds defined by BAAQMD to attain the goals and objectives of the 2017 CAP.

Control Measures. The 2017 CAP includes several transportation-control measures that pertain to construction activities including heavy equipment use, such as providing incentives to promote ridesharing (TR8), and to purchase new trucks that exceed nitrogen oxide (NOx) emission standards, hybrid trucks, or zero-emission trucks (TR19).

The pertinent transportation control measures are voluntary incentive measures that do not require vehicle upgrades or retrofits. The project would not require purchase of any vehicles or equipment. The project use of construction vehicles and equipment would not conflict with these programs and would not conflict with or obstruct implementation of the control measures identified to achieve the goals of the 2017 CAP. No impact would occur from conflict with the 2017 CAP transportation-control measures.

Emissions. Construction emissions for the project were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 based on the estimated construction schedule and anticipated equipment use for project construction. The air quality model emissions calculations and assumptions are documented in Appendix A. The estimated emissions from construction of the project are provided in Table 2-1. Estimated daily and annual emissions from operation of the project are provided in Table 2-2 and Table 2-3, respectively. Project construction and operational emissions would not exceed the numerical significance thresholds prepared by BAAQMD. BAAQMD CEQA Air Quality Guidelines require the implementation of basic control measures to control fugitive dust, vehicle and VOC emissions from projects that involve grading and land disturbance. The applicant has not proposed implementation of the BAAQMD basic control measures. Lack of implementation of the BAAQMD basic control measures would conflict with the BAAQMD CEQA Guidelines, and result in a significant impact. Mitigation Measure AQ-1 requires implementation of fugitive dust control measures to minimize fugitive dust generation during construction. Mitigation Measure AQ-2 requires the implementation of measures to reduce exhaust emissions during construction, such as minimizing idling times of equipment not in use. With the implementation of Mitigation Measures AQ-1 and AQ-2, impacts from conflicts with an air quality plan would be reduced to less than significant.

Table 2-1 Estimated Construction Emissions

Condition	ROG	NO_x	PM_{10}	$PM_{2.5}$	CO
Total Construction Emissions (tons)	0.16	0.62	0.03	0.03	0.54
Average Daily Construction Emissions (pounds)	1.76	6.81	0.30	0.28	5.93
Significance Threshold	54	54	82	54	---
Significant (Yes or No)?	No	No	No	No	No

Source: CalEEMod Version 2020.4.0

Table 2-2 Estimated Daily Operational Emissions (pounds)

Condition	ROG	NO_x	PM_{10}	$PM_{2.5}$	CO
Project Summer Daily Emissions	4.61	0.21	0.95	0.81	6.51
Project Winter Daily Emissions	4.60	0.23	0.95	0.81	6.57

Maximum Daily Emissions	**4.61**	**0.23**	**0.95**	**0.81**	**6.57**
Significance Threshold	54	54	82	54	---
Significant Impact?	No	No	No	No	No

Source: CalEEMod Version 2020.4.0

Table 2-3 Estimated Annual Operational Emissions (tons)

Condition	ROG	NO_x	PM_{10}	$PM_{2.5}$	CO
Project Annual Emissions	0.11	0.03	0.04	0.01	0.21
Significance Threshold	10	10	15	10	---
Significant (Yes or No)?	No	No	No	No	No

Source: CalEEMod Version 2020.4.0

Mitigation Measure AQ-1. Fugitive Dust Control Measures

The applicant shall require their construction contractors to reduce construction-related fugitive dust by implementing BAAQMD's basic control measures at all construction and staging areas, including the following:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off site shall be covered.
- 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 is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- The paving of all roadways, driveways, and sidewalks 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.
- 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 with 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Mitigation Measure AQ-2. Exhaust Reduction Measures

The applicant shall require their construction contractors to implement the following measures during construction to reduce exhaust emissions:

- Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- The applicant shall encourage their contractors to reduce construction-related fugitive ROG emissions by ensuring that low-VOC coatings that have a VOC content of 50 grams/liter or less are used during the coating of the buildings' interiors and exterior surfaces. The project applicant shall submit evidence of the use of low-VOC coatings to BAAQMD prior to the start of construction.

B) Less than Significant Impact

Road and Utilities Extension

Construction

The Air Basin is designated as a non-attainment area for ozone and $PM_{2.5}$ under both National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The Air Basin is also designated as non-attainment for PM_{10} under CAAQS but not NAAQS. The project could have a cumulatively considerable impact on air quality if it either (1) resulted in emissions above the significance thresholds or (2) violated any action in an attainment plan. BAAQMD thresholds for ozone precursor pollutants (ROGs and NO_X) and particulate matter (PM_{10} and $PM_{2.5}$) are the thresholds at which a project would be considered to constitute a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment.

Operation of vehicles and equipment during project construction would emit diesel particulate matter and other criteria air pollutants. Construction would occur over approximately 9 months and is assumed to start in 2023. Table 2-1 shows the estimated unmitigated average daily emissions for construction. The emissions generated during construction of the project would not exceed BAAQMD significance thresholds. As analyzed under Impact A above, the emissions generated during the construction and operation would not exceed the significance thresholds for ROGs or NO_X or other ozone precursors or for particulate matter (PM_{10} and $PM_{2.5}$). The project would not result in a cumulative considerable net increase for any pollutant that is in non-attainment. Because operation of the project would not exceed any air quality emission thresholds, the project would not cause a cumulatively considerable net increase of

any pollutant for which the region is in non-attainment and the impact would be less than significant.

BAAQMD does not set numerical thresholds for fugitive dust generated during construction; however, BAAQMD requires implementation of basic control measures to control fugitive dust, equipment emissions, and VOCs. Fugitive dust, equipment, and VOC emissions generated during construction have the potential to contribute to an existing air quality violation and result in a significant impact. Mitigation Measure AQ-1 requires implementation of fugitive dust control measures to minimize fugitive dust generation during construction. Mitigation Measure AQ-2 requires the implementation of measures to reduce exhaust emissions during construction, such as minimizing idling times of equipment not in use. With the implementation of Mitigation Measures AQ-1 and AQ-2, impacts from violation of an air quality standard or contribution to an existing air quality violation would be reduced to less than significant.

Future Development of Adjacent Parcels

Future construction of residential properties would be compatible with the underlying zoning and land use designations. Operational emissions were calculated for transportation, area sources, electricity consumption, natural gas combustion, electricity usage associated with water usage and wastewater discharge, and solid-waste land filling and transport. Estimated daily and annual operational emissions that would be associated with the project are provided in Table 2-2 and Table 2-3.

The project would not result in a cumulatively considerable net increase for any pollutant that is in non-attainment. Construction of the residential properties would also be required to implement Mitigation Measures AQ-1 and AQ-2 to comply with BAAQMD requirements to limit fugitive dust and reduce exhaust emissions. With the implementation of Mitigation Measures AQ-1 and AQ-2, impacts from violation of an air quality standard or contribution to an existing air quality violation would be reduced to less than significant.

C) Less than Significant Impact

BAAQMD defines sensitive receptors as "facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly and people with illnesses" (BAAQMD, 2017b). BAAQMD recommends identifying sensitive receptors generally within 1,000 feet of a project site (BAAQMD, 2017a). Numerous residential homes surround the project site, including those situated along Alhambra Drive and Sequoia Way. Cipriani Elementary School is located approximately 0.5 mile (2,640 ft) to the south of the project site.

The project would constitute a new emission source of diesel particulate matter (DPM) and $PM_{2.5}$ during construction activities. Studies have demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. The project includes construction of residences, which would locate sensitive receptors near existing permitted stationary sources. On this account, implementation

of the project has the potential to expose sensitive receptors to substantial pollutant concentrations.

A Health Risk Assessment was prepared for the project that analyzed the incremental cancer risks to sensitive receptors in the vicinity of the project and provided a worst–case estimate of the increased exposure by employing a standard emission estimation program, an accepted pollutant dispersion model, approved toxicity factors, and conservative exposure parameters. Table 2-4 below provides the maximum cancer risk from unmitigated project construction emissions for a residential-adult receptor and for a residential-child receptors.

Table 2-4 Estimated Unmitigated Health Impacts for Existing Receptors

Source	Cancer Risk (child/adult)	Hazard Impact	$PM_{2.5}$ Concentration
Unmitigated Proposed Project Construction	17.4/0.78	0.02	0.32
Total Proposed Project	**17.4/0.78**	**0.02**	**0.32**
Significance Threshold	10	1.0	0.3
Potentially Significant (Yes or No)?	**Yes**	No	**Yes**

Source: (RCH Group, 2022)

The maximum cancer risk from unmitigated project construction emissions for a residential-adult receptor would be 0.8 per million and for a residential-child receptor would be 17.4 per million. The maximum concentrations would occur at a residence to the east and within 100 feet of the project site. Thus, the cancer risk due to construction activities and project operations are potentially above the BAAQMD threshold of 10 per million and would be potentially significant.

Mitigation Measure AQ-3 would be implemented to reduce emissions. Mitigation Measure AQ-3 requires that all construction equipment larger than 50 horsepower used at the site for either more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified Tier 3 emission standards for particulate matter and shall be equipped with California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filters. Mitigation Measure AQ-3 also requires all stationary construction equipment, such as diesel-powered generators, to be operated continuously and located at least 100 feet from air quality sensitive receptors (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses) whenever possible. With the implementation of Mitigation Measures AQ-1 through AQ-3, the maximum cancer risk from project construction for a residential-adult receptor would be 0.1 per million and for a residential-child receptor would be 2.9 per million. Thus, the cancer risk due to construction activities and project operations would be below the BAAQMD threshold of 10 per million and would be less than significant with mitigation incorporated.

Mitigation Measure AQ-3. Enhanced Exhaust Emissions Reduction Measures

The applicant shall implement the following measures during construction to further reduce construction-related exhaust emissions:

- All construction equipment larger than 50 horsepower used at the site for either more than two continuous days or 20 hours total shall utilize diesel engines that are USEPA certified Tier 3 emission standards for particulate matter and shall be equipped with CARB-certified Level 3 Diesel Particulate Filters. Prior to the issuance of any demolition permits, the project applicant shall submit specifications of the equipment to be used during construction and confirmation this requirement is met.
- Equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts shall be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Tier 3 construction equipment or better and located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

D) Less than Significant Impact

Construction

Construction of the project would generate some temporary odors from diesel exhaust emissions. The concentration of diesel engines could increase the odors temporarily in the immediate vicinity of the equipment operation. The odors would dissipate rapidly with distance from the odor generating activity. The generation of odors from diesel engines would not be substantial or permanent. As such, a substantial number of people would not be subjected to any construction-related odors, however minimal, resulting in a less than significant impact.

Operation

Operation of the project would not generate other emissions, including those leading to odors. No impact would occur.

2.2.4 Biological Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) 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 Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
c) 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?	☐	☐	☐	☒
d) 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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Environmental Setting

A Biological Resource Assessment was prepared for the project by Wood Biological Consulting (Appendix B). Biological resources were evaluated within a biological study area (BSA) that included the road easement, three additional parcels, and adjacent lands within a radius of approximately 92 meters (300 feet) (Wood Biological Consulting 2018). The information below is a summary of the biological resource information contained in the Biological Resources Assessment.

Regional Setting

The project site is situated near the top of a northwest-facing slope overlooking San Juan Canyon. Lands to the north and east of the BSA support single-family residences. Undeveloped lands are situated to the south of the project site, with additional homes located beyond. The project site is contiguous to undeveloped slopes of San Juan Canyon and the San Juan Hills. San Juan Canyon is contiguous with the City of San Mateo's Sugar Loaf Mountain Open Space Preserve and Laurelwood Park.

Plant and Wildlife Habitats

Plant communities and wildlife habitats occurring within the BSA are characterized as ornamental, coast live oak woodland, coyote brush scrub, non-native annual grassland, and foothill needlegrass grassland. One special-status natural community, Foothill Needlegrass Grassland, occurs in three small areas within the BSA (Table 2-5).

Table 2-5 Plant and Wildlife Habitats in the Project Area

Plant Community	Area (acres)
Coast live oak woodland	0.59
Foothill needlegrass grassland	0.04
Non-native annual grassland	0.30
Ornamental	0.03
Total	**0.97***

*Notes: *Lot 7 was not included in the initial BSA but it appears to contain coast live oak woodland.*
Source: (Wood Biological Consulting, 2018);Appendix B)

Special-Status Plant Species

Table 2-6 lists special-status plant species with suitable habitat in the project area, based on the presence of suitable habitat and known occurrences in the region. A focused survey for the seven special-status plant species that have a potential to occur in the project area was conducted on April 22, 2019, during the blooming period for all special-status species that could occur on the site. No special-status plants were observed during the focused surveys. As a result, special-status plants are presumed to be absent from the site because surveys were performed at the known time of year that special-status plants would be in bloom and observed if they occurred on the site.

Table 2-6 Special-Status Plant Species with Potential to Occur in the Project Area

Common Name	Scientific Name	Regulatory Status	Habitat	Potential to Occur
Franciscan onion	*Allium peninsulare var. franciscanum*	CRPR: 1B.2; Global Status/State rarity rank: G2/S2	Woodland and grassland areas	Absent

Common Name	Scientific Name	Regulatory Status	Habitat	Potential to Occur
San Francisco collinsia	*Collinsia multicolor*	CRPR: 1B.2; Global /State rarity ranking: G2/S2.2	Oak woodland habitat	Absent
Bent-flowered fiddleneck	*Amsinckia lunaris*	CRPR: 1B.2; Global /State rarity ranking: G2/S2	Non-native annual grassland, foothill needlegrass grassland, and more open understory of oak woodland	Absent
Brewer's calandrinia	*Calandrinia breweri*	CRPR: 4.2; Global /State rarity ranking: G4/S4	Grassland and scrub habitats	Absent
California bottle-brush grass	*Elymus californicus*	CRPR: 4.3; Global/State rarity ranking: G4/S4	Oak woodland	Absent
Woodland monolopia	*Monolopia gracilens*	CRPR: 1.B2; Global/St rarity ranking: G3/S3	Oak woodland and grasslands	Absent
Chaparral ragwort	*Senecio aphanactis*	CRPR: 2.B2; Global/State rarity ranking: G3/S2	Rocky or bare soils within grassland area	Absent

Notes:

CRPR = California Rare Plant Rank; CRPR ranges from presumed extinct species (1A) to limited distribution species now (4). Ranks at each level also include a threat rank (e.g., CRPR 4.3) from seriously threatened (0.1) to not very threatened (0.3).

G = Global Conservation Status; critically imperiled (G1) to secure (G5)

S = Subnational Conservation Status; critically imperiled (S1) to secure (S5)

Source: Biological Resource Assessment (Appendix B)

Special-Status Animal Species

No federally or State-listed animal species have any potential to occur on site or be adversely affected by project implementation. A total of 85 special-status animal species have been recorded in and surrounding the BSA. However, due to the existing habitats on site and the geographic location, 79 of the identified species are not anticipated to occur on site. The special-status animal species that have a potential to occur within the project area are listed in Table 2-7.

Table 2-7 Special-Status Animal Species with Potential to Occur in the Project Area

Common Name	Scientific Name	Regulatory Status	Habitat	Potential to Occur
Allen's hummingbird	*Selasphorus sasin*	CDFW: Special Animal (nesting); USFWS: Bird of Conservation Concern; Global/State rarity ranking: G5/S4	Coast live oakwood	Suitable nesting and foraging habitat occurs in the project area

Common Name	Scientific Name	Regulatory Status	Habitat	Potential to Occur
California thrasher	*Toxostoma redivivum*	USFWS: Bird of Conservation Concern	Coast live oakwood	Suitable nesting and foraging habitat occurs within the project area.
Nuttall's woodpecker	*Picoides nuttallii*	CDFW: Special Animal (nesting); USFWS: Bird of Conservation Concern	Coast live oak trees; canyons and shaded areas	Suitable habitat features are present within the San Ramon Creek riparian corridor and coast live oak woodland on the project site.
Oak titmouse	*Baeolophus inornatus*	CDFW: Special Animal (nesting); USFWS: Bird of Conservation Concern; Global/State rarity ranking: G4/S4	Coast live oak trees	Potential nest cavities were observed in oak trees during the site reconnaissance, and an oak titmouse was observed foraging within the BSA.
Spotted towhee	*Pipilo maculatu*	USFWS: Bird of Conservation Concern	Coast live oak trees	Suitable habitat exists in the coast live oak woodlands on the project site.
San Francisco dusky-footed woodrat	*Neotoma fuscipes annectens*	CDFW: Species of Special Concern; Global/State rarity ranking: G5T2T3/S2S3	Coast live oak trees	Suitable habitat exists in the trees on the project site; two stick nests were observed in oak trees on site.

Notes:

G = Global Conservation Status; critically imperiled (G1) to secure (G5)

S = Subnational Conservation Status; critically imperiled (S1) to secure (S5)

Source: (Wood Biological Consulting, 2018); Appendix B

Vegetation Communities and Sensitive Natural Communities

Plant communities and wildlife habitats occurring within the project are characterized as ornamental, coast live oak woodland, non-native annual grassland, and foothill needlegrass grassland (Wood Biological Consulting, 2018). Coast live oak woodland and foothill

needlegrass grassland are CDFW sensitive natural communities. Coast live oak woodland is also identified as a sensitive natural community in the City's General Plan. The project site contains three relatively discrete stands of foothill needlegrass grassland along the margins of the road easement and on one of the adjacent parcels (Lot 10, downslope from the road easement). The stands of foothill needlegrass have an estimated cover of between 15 to 25 percent over a total area of 1,696 square feet (0.04 acre). In addition to the habitats within the project area, an area of coyote brush scrub is located west and downslope of the project area, and a riparian corridor occurs downslope of the project within the canyon.

A) Less than Significant with Mitigation Incorporated

Road and Utilities Extension

Special-Status Plants

While the project area contains suitable habitat for special-status plants, no special-status plants were observed within the project area during focused surveys during the appropriate blooming period. Because no special-status plants occur in the project area, the project would not impact special-status plants.

Special-Status Wildlife

Within the project area, grasslands, shrubs, and trees provide nesting habitat for special-status birds including Allen's hummingbird, California thrasher, oak titmouse, and spotted towhee as well as many other migratory bird species. Site-clearing activities (e.g., grubbing, grading, trenching, tree removal or pruning) could result in direct or indirect impacts to special-status birds by causing the destruction or abandonment of occupied nests, which would be a significant impact. Mitigation Measure BIO-1 requires a pre-construction survey by a qualified biologist prior to the removal or significant pruning of any trees to determine the potential presence of special-status bird or raptor nests. If a suspected special-status bird or raptor nest is discovered, the nest would be avoided, and no work would be allowed in the area until young have fledged the nest. Because Mitigation Measure BIO-1 requires avoidance of special-status birds and their nests, impacts to special-status birds would be less than significant.

Two potential San Francisco dusky-footed woodrat nests were detected during the survey of the BSA in 2018, and there is a high likelihood for San Francisco dusky-footed woodrat to occur in the area during construction due to the presence of abundant occupied habitat nearby. The project could cause mortality of San Francisco dusky-footed woodrat if their nest were destroyed and San Francisco dusky-footed woodrats were killed during construction, which would be a significant impact. Mitigation Measure BIO-2 requires a biologist to survey the site for San Francisco dusky-footed woodrat nests within and adjacent to the limits of grading prior to site clearing, grubbing, or tree removal. All nests (active or inactive) should be mapped and flagged in the field. The mitigation also defines procedures for avoidance and dismantling of woodrat nests that are observed and outlines what construction activities can be performed during breeding and non-breeding season to ensure the project would avoid killing this special-status wildlife species. With implementation of Mitigation Measure BIO-2, impacts to San Francisco dusky-footed woodrats would be less than significant.

Construction workers could encounter special-status species during project construction activities. Construction workers may lack understanding of special-status species behavior and the protection measures required to protect each species; therefore, construction personnel may inadvertently harm, injure, or kill special-status wildlife species by driving vehicles and equipment at unsafe speeds on area roadways or conducting construction activities outside of authorized work limits in special-status species habitat. The potential impact on special-status wildlife is significant. Mitigation Measure BIO-3 requires worker environmental awareness training to inform project personnel of special-status wildlife that may be encountered on site. The training would identify contact information for the project biologist and methods to avoid impacts to special-status species. Construction worker impacts on special-status wildlife species would be less than significant with mitigation.

Future Development of Adjacent Parcels

Future construction of residential properties has the potential to result in impacts to special-status plants through crushing or removal of special-status plants if habitat conditions on the site changed prior to residential development. Mitigation Measure BIO-4 defines procedures for pre-construction surveys and mitigation for rare plants. The pre-construction survey for rare plants would apply if the habitat conditions on the site change or if more than 5 years pass after the previous Focused Rare Plant Survey has been completed. The impact on special-status plants would be less than significant with mitigation.

The future residential construction also has the potential to inadvertently harm, injure, or kill special-status wildlife species by removing habitat for special-status wildlife and by causing injury or mortality to special-status wildlife during vegetation removal, grading, and excavation activities within habitat for special-status wildlife. The potential impacts on special-status wildlife from future residential construction would be similar to the impacts of the road construction and would be significant. As discussed for the roadway-extension impacts above, Mitigation Measures BIO-1 through BIO-3 would avoid and mitigate significant project impacts to special-status wildlife. With the implementation of Mitigation Measures BIO-1 through BIO-3, impacts on special-status wildlife during future residential development would be less than significant.

Mitigation Measure BIO-1. Special-Status and Migratory Birds

The measures outlined below shall be implemented to avoid significant impacts on special-status and migratory birds:

1. **Raptor nests**. Any trees subject to removal within the project site shall be inspected by a qualified biologist for the presence of raptor nests. Inspection for raptor nests shall be required regardless of the season. If a suspected raptor nest is discovered, the CDFW should be notified, and the nest shall be avoided until CDFW approves removal of the inactive nest. Pursuant to the CFGC, raptor nests may not be removed until approval is granted by the CDFW.

2. **Site clearing – non-breeding season**. The project shall be scheduled to conduct vegetation clearing and tree removal outside of the breeding season to the extent feasible. If clearing, grubbing, or tree removal/pruning are to be conducted outside of the breeding season (i.e., September 1 through January 31), no pre-construction surveys for nesting migratory birds are necessary.

3. **Site clearing – breeding season**. A preconstruction nesting bird survey shall be conducted prior to clearing, grubbing, tree removal, or pruning during the breeding season (i.e., February 1 through August 31). The pre-construction nesting bird survey shall be performed by a qualified biologist no more than 2 weeks prior to the initiation of work. If no nesting or breeding activity is observed, work may proceed without restrictions. To the extent allowed by access, all active nests identified within 250 feet of the project site for raptors and special-status birds and 50 feet for passerines and non-special-status birds shall be mapped.

4. **Active nesting**. For any active nests found near the construction limits (250 feet from the project site for raptors and special-status birds and 50 feet for passerines and non-special-status birds), a qualified biologist shall make a determination as to whether or not construction activities are likely to disrupt reproductive behavior. If it is determined that construction is unlikely to disrupt breeding behavior, construction may proceed. If it is determined that construction may disrupt breeding, a no-construction buffer zone shall be designated, and the nest shall be monitored until the young have fledged the nest. If construction activities appear to be affecting the nesting activities, an expanded buffer zone shall be implemented until all young have fledged the nest. Avoidance of impacts on nesting migratory birds is the only acceptable mitigation; a take of nesting birds is a violation of State and federal law. The ultimate size of the no-construction buffer zone may be adjusted by a qualified biologist based on the species involved, topography, lines of site between the work area and the nest, physical barriers, and the ambient level of human activity. If it is determined that construction activities are likely to disrupt raptor breeding, construction activities within the no-construction buffer zone may not proceed until the qualified biologist determines that the nest is long longer occupied.

5. **Nest monitoring**. If maintenance of a no-construction buffer zone is not feasible, the project biologist should monitor the nest(s) to document breeding and rearing behavior of the adult birds. If it is determined that construction activities are likely to cause nest abandonment, work should cease immediately and the CDFW and/or the USFWS Division of Migratory Bird Management should be contacted for guidance.

Mitigation Measure BIO-2. San Francisco Dusky-Footed Woodrat

To avoid direct mortalities and adverse effects on San Francisco dusky-footed woodrat, the following measures should be implemented.

1. **Site clearing**. Prior to site clearing, grubbing, or tree removal, the project biologist shall conduct a survey for San Francisco dusky-footed woodrat nests within and adjacent to the limits of grading. All San Francisco dusky-footed woodrat nests (active or inactive) shall be mapped and flagged in the field. If no stick nests are detected, no further surveys, monitoring or mitigation are warranted.

2. **Nest removal – non-breeding season.** If a woodrat nest is detected in the work zone and it cannot be avoided, site clearing shall be performed during the non-breeding season (i.e., September 1 through November 30) to the extent feasible. During the non-breeding season, the nest shall be disassembled by hand and the nest materials (e.g., sticks) removed and disposed of off site. Any adult animals present should be permitted to disperse into adjacent habitat. This work may only be performed by a qualified biologist after CDFW has been notified about the nest removal.

3. **Nest removal – breeding season**. If San Francisco dusky-footed woodrat nest removal must occur during the breeding season (i.e., December 1 through August 31), it will be necessary to determine whether or not the nest is occupied prior to nest disassembly. Nest occupation may be observed through installation of cameras at the nest or by a biologist on the ground. If no animals are observed, the nest may be disassembled by hand. If, during the process of disassembling the nest, live animals are encountered, nest materials should be replaced on top of the nest and the effort abandoned until the nest is no longer occupied. A nest may not be disassembled while young woodrats are present.

Mitigation Measure BIO-3. Worker Environmental Awareness Program (WEAP)

A qualified biologist shall conduct employee education training for the project's construction workers. Personnel shall be required to attend the presentation, which would describe the federal and State statutes protecting threatened, endangered, and special-status species that may be encountered on site, minimization and conservation measures, legal protection of species, and other related issues. The worker training will include photos and information about the special-status species that could occur on the project site. All attendees shall sign an attendance sheet along with their printed name, company or agency, email address, and telephone number.

Mitigation Measure BIO-4. Special-Status Plants

The following impact avoidance and minimization measures shall be implemented if the project conditions change prior to construction or if 5 years pass after the completion of a previous floristic plant survey:

1. A floristic survey shall be completed in accordance with the guidelines outlined by the CDFW (CDFG 2009), USFWS (2000a), and CNPS (2001). These guidelines call for the performance of surveys during each season in which all potentially occurring special-status species would be identifiable. For the subject property, surveys should be

performed in the spring (April–May). All plant species must be identified to the lowest taxonomic level to determine their rarity status.

2. Any special-status species identified on site shall be mapped and enumerated, and field forms should be submitted to the CNDDB.
3. The location of all special-status plant populations shall be mapped relative to the proposed limits of grading.
4. Where feasible, construction limit fencing shall be installed around the sensitive plant species population to avoid the special-status plant species during construction.
5. Where special-status plants cannot be avoided, the individuals and area occupied by each special-status plant population shall be quantified and the plants shall either be transplanted on site or mitigated off site if offsite mitigation is biologically preferable for the species. Any onsite transplants would be monitored for a period of 5 years to verify species success. If the onsite transplant is not successful, offsite mitigation shall be implemented. Offsite mitigation may involve seed and/or plant collection preservation and enhancement of off-site populations, funding for seed and plant collection for research purposes, payment of in-lieu fees to an approved mitigation bank or conservation-oriented organization, or other measures. Any offsite mitigation would be completed at a 2:1 ratio to address the loss of on-site species and temporary habitat loss.
6. No direct or indirect impacts to plant species listed under CESA is allowable without consultation with the CDFW and issuance of an Incidental Take Permit (ITP), pursuant to CESA.

B) Less than Significant with Mitigation Incorporated

Riparian Areas

No riparian habitat occurs within the project area. The project would therefore not directly impact riparian habitat. The project could cause erosion and sedimentation to downstream riparian areas if proper erosion and sediment control measures were not included in the project design. The project area of disturbance for the roadway would be 0.21 acre, and the roadway would be stabilized with asphalt and a retaining wall. The residential lots that would be available for future residential development total less than 1 acre. The residential lots would not be entirely developed, and the project also includes water quality improvement and retention features to reduce offsite sedimentation. The resulting potential impact from erosion and sedimentation to offsite riparian areas would be less than substantial.

Sensitive Vegetation Communities

Sensitive vegetation communities, coast live oak woodland, and foothill needlegrass grasslands occur within the project area for both the Monte Cresta Drive extension and future residential development. The project grubbing, vegetation removal, and grading activities would result in removal of sensitive vegetation communities of coast live oak woodland and foothill needlegrass grasslands, which would be a significant impact. Thirteen coast live oaks would be removed during site preparation and grading of the road. The applicant has proposed planting of 13 coast live oaks within the project site as part of the project (see Appendix E). The replanting would partially replace the loss of coast live oak woodland; however, due to the long

time for coast live oaks to mature and because not all planted trees will survive, the impact from loss of coast live oak woodlands would remain significant. In addition, the area within the future residential development, including Lot 7, includes coast live oak woodland. No planting has been proposed for removal of coast live oak woodland for future residential development. The impact on coast live oak woodland from both the road construction and future residential development would be significant.

Mitigation Measure BIO-5 would require the project applicant to prepare and implement a Grassland Restoration Plan that identifies grassland replanting areas, Best Management Practices (BMPs) to prevent soil erosion, and specifications on reseeding or replanting. Compliance with Mitigation Measure BIO-5 would ensure that impacts to foothill needlegrass grassland are avoided, minimized, or compensated. Impacts to foothill needlegrass grassland would be less than significant with mitigation. Mitigation Measure BIO-6 would require the replacement of the removed oak trees at a specified ratio based on tree size. The applicant will be required to plant replacement trees on site ~~or~~ and may contribute to the Parks Department Tree Planting and Establishment Fund for oak trees that cannot be accommodated onsite. Offsite compensation may include the permanent protection of an offsite population of oak woodland habitat through a conservation easement or the purchase of mitigation banking credits. With implementation of Mitigation Measure BIO-6 for both the access road and future residential development, impacts would be less than significant.

Mitigation Measure BIO-5. Mitigation for Foothill Needlegrass Grassland

The following measures shall be implemented to mitigate for impacts on foothill needlegrass grassland:

1. **Minimize impact**. Future residential development shall be designed in a manner that minimizes impacts on stands of foothill needlegrass grassland to the maximum practicable extent.
2. **Quantify unavoidable impacts**. Areas of project development including temporary and permanent impacts shall be surveyed by a qualified biologist prior to construction to quantify the area of foothill needlegrass grassland that will be impacted.
3. **Grassland Restoration Plan**. A Grassland Restoration Plan shall be prepared by a qualified biologist and reviewed and approved by the City prior to construction. The plan should include the following components:
    a. Identification of the grassland planting area outside of the development footprint and within areas of suitable habitat conditions for foothill needlegrass grassland.
    b. Specifications for the salvage of topsoil. Following road construction, disturbed compacted soils to be restored with foothill needlegrass should be roughened by light, shallow disking or equivalent means.
    c. Specification of Best Management Practices (BMPs) to prevent erosion and sedimentation during and following construction.

d. Specifications for reseeding or replanting with foothill needlegrass and additional native grass and forb species suitable for erosion control. Seeded areas should then be covered with blown seed-free straw or an equivalent type of mulch to increase infiltration, minimize compaction and runoff, and to minimize seed predation.
e. Specifications for routine maintenance measures (e.g., prescribed grazing, mowing, eradication of invasive non-native species) to protect restoration sites and promote the establishment of foothill needlegrass during a one-year establishment period.
f. Specifications for monitoring to identify remedial measures as warranted for the successful re-establishment of foothill needlegrass grassland. Monitoring should be conducted for a period of three years following construction.
g. Photo points established to cover all grassland restoration areas. Photographs shall be taken prior to the commencement of work, upon the completion of work, and twice annually during the monitoring period.
h. Criteria by which successful restoration can be gauged. The collection of quantitative vegetation data and success standards are not proposed. Rather, the qualified biologist should provide a subjective evaluation of the cover and density of foothill needlegrass in the restored areas compared to preconstruction conditions.
i. Annual memoranda should be prepared by the qualified biologist and submitted to the lead agency by the end of each calendar year. The memoranda should include site photographs and a brief assessment of the reestablishment of foothill needlegrass.
j. If, at the end of three years, the qualified biologist can make a reasonable assumption that the restored areas are successfully recolonized by foothill needlegrass, the effort should be deemed successful and no further monitoring is warranted. If foothill needlegrass is not found to recolonize the disturbed areas, the qualified biologist should submit written recommendations for remedial actions such as reseeding and an extension of the monitoring period. This proposal should be submitted to the City of Belmont for review and concurrence.

Mitigation Measure BIO-6. Mitigation for Oak Woodland Habitat

The loss of oak woodland habitat shall be mitigated through onsite plantings of coast live oaks (*Quercus Agrifolia*) trees at a minimum 15-gallon size. The project applicant shall prepare a Planting Plan to address oak woodland planting as mitigation. The project applicant shall replace removed oak trees at the following ratios:

- 5:1 replacement for impacted oak trees greater than 25 inches in diameter
- 2:1 replacement for impacted oak trees smaller than 25 inches in diameter

The replacement trees shall be monitored for a period of five years and shall be able to survive the last two years of the minimum five-year monitoring period without supplemental irrigation. If at any time the applicant identifies additional trees that need to be removed, the applicant shall first get written approval from the City of Belmont and applicant shall revise the final Planting Plan to include additional tree plantings in accordance with the abovementioned ratios.

The applicant may also mitigate by contributing to the City's in-lieu fee program fund (at a 2:1 ratio) in accordance with the City's current Master Fee Schedule for oak trees plantings that cannot replanted onsite.

C) No Impact

No wetlands occur within the project area. The project occurs on a hillslope, and no dredging or filling of wetlands would occur as part of the project. Therefore, the project would not impact any state or federally protected wetlands.

D) Less than Significant Impact with Mitigation

The project, including the road and utilities extension and future residential development, is not located within a wildlife corridor. The project is situated between two residential development areas on a hillslope. Construction of the project would not substantially interfere with wildlife movement or migration patterns.

Road and Utilities Extension

The project site contains coast oak woodlands that provide native wildlife nursery sites. Approximately 19 trees would be removed by the extension of Monte Cresta Drive. The trees to be removed for project construction are shown in Figure 4. Birds could nest and bats could roost in trees that would be removed by the project. Tree removal could result in nest destruction or mortality of young protected under California Fish and Game Code if an active nest were present at the time of removal. Use of heavy equipment and the increase in human activity associated with the project could also cause nest abandonment if construction were to occur near an active nest during the nesting season. These actions would result in a significant impact to migratory bird and bat species and would be a significant impact on a native wildlife nursery site.

Mitigation Measure BIO-1 requires either tree removal to occur outside the nesting season or implementation of specific nest-avoidance procedures during the bird nesting season, including conducting pre-construction nesting bird surveys and establishing buffers around any active nests. Because migratory bird nests would be avoided with Mitigation Measure BIO-1, impacts on native wildlife nursery sites would be less than significant with implementation of mitigation.

Future Development of Adjacent Parcels

Future residential development would also impact the coast oak woodland habitat, the removal of which may result in impacts to native wildlife nursery sites, as discussed above. Mitigation

Measure BIO-1 requires construction to occur outside of the nesting season or implementation of measures to avoid active nests. With implementation of Mitigation Measure BIO-1, impacts to native wildlife nursery sites would be less than significant.

E) Less than Significant Impact

The City's Community Development Department reviews tree-removal permit applications for development entitlements (e.g., building permits, design reviews, variances). A permit is required to remove a "Protected Tree" except when 1) a City official determines that the tree poses an imminent danger to people or property, 2) a City official determines that the tree is a substantial fire hazard, or 3) the tree is planted, grown, and held for sale as part of a licensed nursery business. The following trees are considered protected trees:

- Principal native trees: coast live oak, valley oak, redwood, madrone, bay laurel, or buckeye having a single main stem or trunk of 10 inches or more in diameter at breast height (DBH) or up to 3 of the largest secondary stems totaling 10 inches or more DBH.
- City tree: Any woody, perennial plant, regardless of size, located in a City park, a designated open space, or on any other city property. A single or multi-stemmed shrub or bush is not a City tree.
- Large diameter tree: 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.
- Replacement tree: Any tree, regardless of size, which has been planted as required mitigation for the previous removal of another tree at the same site or elsewhere in the city.
- Right-of-way tree: A tree located in a public street right-of-way. Note: The adjacent property owner is responsible for trees, curbs, gutters, and sidewalks in the right-of-way; a fence does not determine the property line. The City's responsibility ends at the edge of the roadway.

For each Protected Tree removed, the applicant must plant a "Preferred Species Tree," minimum 15 gallons, or pay an "in-lieu of planting fee" established by the City Council.

Preferred Species Trees include the following:

- Principal Native Trees, as defined in the Belmont Tree Ordinance
- Native or locally acclimated tree species designated as preferred species trees by the City Manager (in consultation with the City Arborist). The list of Preferred Species Trees is provided on the City's website.

Road and Utilities Extension

As noted in Section 2.2.4 Biological Resources response (D), above, approximately 19 trees would be removed during construction of the road and utilities extension. The trees to be removed for project construction include eight coast live oak trees that are larger than 10 inches in diameter and meet the criteria of Principal Native Trees. Principal Native Trees are

designated protected trees under the Belmont Tree Ordinance (Belmont City Code, Chapter 25). The project is required to secure a tree removal permit from the City for the removal of the eight protected trees. The applicant has proposed to replant 13 coast live oak trees (15-gallon size) and complies with the Belmont Tree Ordinance. Project compliance with the Belmont Tree Ordinance would render impacts related to conflict with local policies or ordinances less than significant.

Future Development of Adjacent Parcels

Future development of the adjacent parcels could also require removal of Protected Trees. Because future development would also require compliance with the City ordinance, including obtaining a tree removal permit and either planting replacement trees or paying into the City's in-lieu fee program prior to removing any Protected Tree, there would be no conflict with the Belmont Tree Ordinance and the impact would be less than significant.

F) No Impact

The project site is not located within the boundaries of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. The project would not conflict with any adopted or approved conservation plan. No impact would occur.

2.2.5 Cultural Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

A and B) Less than Significant Impact with Mitigation Incorporated

The project is located in a developed residential neighborhood, and the surrounding parcels are GP designated as HRO and RES-L. The project is located within an undeveloped area containing non-native annual grasslands, foothill needlegrass grassland, oak woodland, and ornamental vegetation.

Archival research was conducted to identify previously recorded historical or archaeological resources within 0.5 mile of the area of potential effect (APE) for the project. The APE included

the area of direct impact (project footprint), existing and proposed right-of-way, temporary and permanent construction easements work areas, and staging areas. Archival research included:

- Records search at the Northwest Information Center, Sonoma State University (NWIC File Nos. 15-0599 and 17-2513),
- Examination of available County records, maps, and aerial photographs,
- Consultation with the Native American Heritage Commission

The archival research included a review of APE to determine if previously recorded resources were documented on-site that meet California Register of Historical Resources (CRHR) criteria. No CRHR-eligible or listed resources are located within the project site. According to the City's Land Use Element, the project site is not located near a site designated as historically significant.

The City received a letter from the Native American Heritage Commission (NAHC) on April 7, 2022 that included a list of tribes that are traditionally and culturally affiliated with the geographic area of the project. Formal notification letters were sent to representatives of each of the six Native American tribes listed in the letter. Table 2-8 summarizes the outreach efforts conducted for the project.

Table 2-8 Summary of Tribal Outreach

Tribe	Date County Sent Notification	Date Response Received	Nature of Correspondence
Amah MutsunTribal Band of Mission San Juan Bautista	April 27, 2022	None	Provided notice about the project.
Costanoan Rumsen Carmel Tribe	April 27, 2022	None	Provided notice about the project.
Indian Canyon Mutsun Band of Costanoan	April 27, 2022	None	Provided notice about the project.
Muwekma Ohlone Indian Tribe of the SF Bay Area	April 27, 2022	None	Provided notice about the project.
The Ohlone Indian Tribe	April 27, 2022	None	Provided notice about the project.
Wuksache Indian Tribe/Eshom Valley Band	April 27, 2022	None	Provided notice about the project.

Construction of the project would require ground-disturbing work activities including vegetation removal, excavation, trenching, and grading. Although historical resources have not been previously recorded on the project site, the possibility of encountering previously undiscovered historic resources cannot be eliminated as previously undiscovered historic or archaeological resources that are eligible for listing on CRHR could be uncovered during

ground disturbance. Impacts to any previously undiscovered historic or archaeological resources that are eligible for listing on CRHR would be potentially significant.

Mitigation Measure CUL-1 requires a professional archaeologist to conduct cultural resources sensitivity training for all construction personnel, cessation of work within a 100-foot radius in the event of a cultural resource discovery, and evaluation of the resource by a qualified archaeologist. Work would not continue until either the archaeologist determines the resource is not CRHR-eligible or treatment of the resource has been completed. With implementation of this mitigation measure, the project would not cause a substantial adverse change in the significance of a historical or archaeological resource. Impacts would be less than significant with mitigation.

Mitigation Measure CUL-1: Cultural Resources Sensitivity Training and Inadvertent Discovery

A professional archeologist shall provide sensitivity training to supervisory staff (biological monitor and construction foreman) prior to initiation of site preparation and/or construction to alert construction workers to the possibility of exposing significant historic and/or prehistoric archaeological resources within the project area. The training shall include a discussion of the types of prehistoric or historic objects that could be exposed and how to recognize them, the need to stop excavation at a discovery and for protection and notification. An "alert sheet" shall be posted in staging areas, such as in construction trailers, to alert personnel to the procedures and protocols to follow for the discovery of a potentially significant historic and/or prehistoric archaeological resources.

In the event of an unanticipated discovery of archaeological and/or historical deposits during project implementation, the City shall ensure that construction crews shall stop all work within 100 feet of the discovery until a qualified archaeologist can assess the previously unrecorded discovery and provide recommendations. A qualified cultural resource specialist/archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort shall be required. If work must commence in the sensitive area, it can only be performed using hand tools or powered hand tools, cannot include ground disturbance below the topsoil layer, and can only be accessed on foot. Alternatively, the cultural resource specialist/archaeologist shall evaluate the resource and determine whether it is:

- Eligible for the CRHR (and a historical resource for purposes of CEQA), or
- A unique archaeological resource as defined by CEQA.

If the resource meets the criteria for eligibility on the CHRH or is a unique archaeological resource, work shall remain halted and the cultural resources specialist/archaeologist shall consult with City staff regarding methods to ensure that no

substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b).

Avoidance of the area, or avoidance of impacts to the resource, is the preferred method of mitigation for impacts to cultural resources and shall be required unless there are other equally effective methods. Other methods to be considered shall include evaluation, collection, recordation, and analysis of any significant cultural materials in accordance with a Cultural Resources Management Plan prepared by the qualified cultural resource specialist/archaeologist. The methods and results of evaluation or data recovery work at an archaeological find shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System.

Work may commence upon completion of evaluation, collection, recordation, and analysis, as approved by the qualified archeologist.

C) Less than Significant Impact with Mitigation Incorporated

No evidence of human remains was identified during project evaluation; however, the possibility of the presence of human remains cannot be eliminated. Disturbance of previously undiscovered human remains during construction would result in a potentially significant impact. In the event human remains are discovered, Mitigation Measure CUL-2 requires cessation of ground-disturbing work and adherence to appropriate excavation, removal, recordation, analysis, custodianship, and final disposition protocols, which would ensure that impacts remain less than significant. Therefore, this potential impact on human remains would be less than significant with mitigation.

Mitigation Measure CUL-2: Human Remains

In the event of an unanticipated discovery of human remains during project implementation, the City shall ensure that construction crews stop all work within 100 feet of the discovery. The City shall treat any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities according to applicable State laws. Such treatment includes work stoppage and immediate notification of the County of San Mateo coroner, requisition of a qualified archaeologist, and, in the event that the coroner determines that the human remains are Native American, notification of the Native American Heritage Commission (NAHC) according to the requirements in Public Resources Code (PRC) Section 5097.98. The NAHC would appoint a Most Likely Descendant (MLD). A qualified archaeologist, the City, and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters. Work may

recommence in the area of discovery following treatment of remains and any associated funerary objects.

2.2.6 Energy

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

A) Less than Significant Impact

Road and Utilities Extension

Equipment and vehicles used during construction of the project would require energy, including gas, diesel, and motor oil. Construction worker vehicles would consume energy via combustion of petroleum products, including gas, diesel, and motor oil. Consumption of energy during construction would be temporary, lasting approximately 9 months, and would cease after the project is completed. Fuel use would be consistent with typical construction practices and would not require excessive or wasteful use of energy that could lead to potentially significant environmental impacts. The impact would be less than significant due to the temporary consumption of energy during construction and small size of the project (0.21 acre).

Future Development of Adjacent Parcels

Future construction of residential properties would be compatible with the underlying zoning and land use designations. The development would also need to comply with the development standards in the City's CAP, which include compliance with the California Green Building Code and energy efficiency standards for development. Additionally, given the small size of the additional five low-density residential properties, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

B) Less than Significant Impact

In 2017, the City adopted a CAP that addresses the City's greenhouse gas (GHG) emissions and serves as a mitigation strategy under CEQA for GHG/climate change impacts. The CAP includes policies and strategies to reduce community and municipal GHG emissions and conserve energy consistent with the City's General Plan.

In addition, the City's General Plan contains several goals, objectives, and policies designed to promote energy conservation and reduce energy demand.

Road and Utilities Extension
The energy efficiency goals identified in the City's CAP and General Plan do not apply to minor road extension projects. The construction activities and operation of the proposed road extension would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impact would occur.

Future Development of Adjacent Parcels
Future construction of residential properties would be compatible with the underlying zoning and land use designations. Any future development would be subject to individual, site-specific review for compatibility with the City development standards and building code regulations required by State law and City policy. Construction of the adjacent parcels would be required to comply with the City's CAP and California Green Building Code standards, which may include additional measures to reduce energy consumption. The future residential development would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

2.2.7 Geology and Soils

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐

c) 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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Setting

A geologic and geotechnical investigation was conducted for the project in 2018. The description of the environmental setting provided below reflects information contained in the City's General Plan as well as the project specific geotechnical report (Romig Engineers 2018). The project geotechnical report is enclosed in Appendix C.

Seismicity

The City is located within the seismically active San Francisco Bay Area, which has several faults and fault zones. Alquist–Priolo Earthquake Fault Zones have been established for the majority of these faults and fault zones. No known earthquake faults are located within the project site (Romig Engineers 2018). The closest earthquake fault to the project site is the San Andreas fault, located approximately 2 miles to the west of the project. The project is located in an area that is subject to earthquakes, but the project site is at low risk for liquefaction or seismic-related ground failure (FTA, 2006).

Liquefaction

According to the City's Safety Element, the project is not located in an area with moderate to high shrink/swell potential or very high liquefaction potential. Soils most susceptible to liquefaction are saturated, loose silty sands, sandy silts, and uniformly graded sands. Relatively shallow bedrock was encountered in borings and observed within the Monte Cresta Drive right-of-way, and no saturated, loose silty sands, or other types of soil prone to liquefaction were encountered over the bedrock; therefore, the likelihood of liquefaction occurring along the project area is low (Romig Engineers, 2018).

Landslides

The project is located in an area with slopes over 30 percent, and portions of the project are located on an area designated as high landslide potential in the City's Safety Element. Several

landslides were observed on and adjacent to the project site during the geotechnical investigation. Within the northern 80 feet of the proposed road extension, shallow soil slumps were observed at three areas along the upslope (eastern) side of the proposed road extension. A broad subdued landslide was mapped on the downslope (west) side of the road alignment (Romig Engineers, 2018). Starting approximately 80 feet south of the northern end of the proposed road extension, a second subdued landslide extends from the upslope (eastern) side of the trail to beyond the downslope (western) side of the road right-of-way. Two smaller landslides were incised within the larger landslide mass. The two smaller landslides appeared to be relatively recent and confined to the near surface soil. The majority of the mass of these landslides appears to have been removed during grading and construction of the relatively new residence downslope of the road right-of-way. The slope between the existing residence and the downslope side of the proposed road extension appears to have been partially stabilized with a series of soldier beam and lagging walls along with concrete retaining walls. Significant additional movement of the slope and landslides upslope of the residence do not appear to have occurred since construction was performed in this area. Recent and active landslides were also mapped just beyond the southern end of the proposed road extension. A large old landslide feature with subtle bowl-shaped topography was observed on the upslope (eastern) side of the existing trail. This mapped landslide extended down to a more recent active landslide beyond the downslope (western) side of the trail. Bedrock was exposed along the upslope (eastern) side of the trail, and side scarps were observed along the periphery of the active landslide. The active landslide has undercut the fill along the downslope (western) side of the trail and extends well downslope beyond the western side of the right-of-way (Romig Engineers, 2018).

Soils

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service – Web Soil Survey, the project site is primarily underlain with the following soil types: Fagan loam, Los Gatos loam, and Orthents-Urban land complex. All of the soil types on the project site are considered well drained.

Discussion

A) (i, ii, and iii) Less than Significant Impact

Road and Utilities Extension

Severe ground shaking has the potential to cause injury to construction workers during construction; however, no active fault zones underline the project site. The potential for strong seismic shaking during the short (9 months) construction window is very low. Precautionary measures, including adherence to State-mandated safety standards, federal Occupational Safety and Health Administration (OSHA) regulations (29 Code of Federal Regulations [CFR] 1910.120) and Cal/OSHA regulations (8 CCR Title 8, section 5192) during construction would minimize hazards to construction workers associated with strong seismic ground shaking.

The proposed road extension would be designed to meet current California seismic codes. Furthermore, extension of the road and utilities would not increase the risk of death or injury

due to seismic shaking or other seismic related activities because the road and utility extension does not include habitable structures. Therefore, impacts would be less than significant.

Future Development of Adjacent Parcels
Any future development would be subject to individual, site-specific review to ensure the development meets development standards and building code regulations required by State law and City policy. Future development would adhere to the HRO2 zoning district requirements that are intended to reduce the risk of geological hazards, such as implementation of slope stabilization techniques.

The potential impacts from geological hazards on the adjacent parcels would be addressed through site-specific geotechnical studies prepared in accordance with California Building Code (CBC) requirements and standard industry practices. Development would conform to the current design provisions of the CBC to mitigate losses from geological hazards. Proposed developments would also adhere to the hillside development requirements contained in the proposed policies, including General Plan Policy 4.4-3, which requires clustered development in the hillside areas to limit exposure to steep slopes; Policy 5.2-1, which encourages that areas with steep slopes remain undeveloped; Policy 6.1-6, which requires geotechnical studies to include analysis of erosion and make recommendations, as warranted; and Policy 6.1-11, which requires the City to support erosion prevention. The road must also be consistent with the San Juan Hills Area Plan and other City ordinances. The San Juan Area Plan and City Code 7-13 (e)(9) specifies the requirements for an unimproved road segment. There are two types of plans required: entire unimproved roadway and unimproved road segment. A road segment was warranted for the project based on geotechnical constraints of the site, such as steep slopes and past evidence of landslides. With adherence to CBC and City requirements including the San Juan Hills Area Plan, impacts would be less than significant.

A) (iv) Less than Significant with Mitigation

Landslides, also referred to as slope failures, include many phenomena that involve the downslope displacement and movement of material triggered either by static (i.e., gravity) or dynamic (i.e., earthquake or over-saturation) forces. Landslide-susceptible areas are characterized by steep slopes, downslope creep of surface materials, and unstable soil conditions.

Landslides may occur on slopes of 15 percent or less, but the probability is greater on steeper slopes. Above 30 percent, conventional single-pad type construction is unsuitable, and construction requires substantial grading and retaining walls.

Road and Utilities Extension
The proposed project is located at the top of a northwest-facing slope overlooking San Juan Canyon. The lands north, west, and east of the project are developed with single family residences. The project site and lands south of the project are undeveloped.

As noted in Section 2.4.4 Grading, the project would require grading to construct the roadway and flat areas for construction access and staging. Approximately 815 cubic yards of material would be excavated from the area to construct a flat road surface. Approximately 590 cubic yards of excess soil material would be exported from the project site. Grading is required to level the surface of the road and to cut into the existing slope. Retaining walls are also included as part of the project to stabilize the slopes.

As noted in the Project Description, the proposed project does not include any on-street parking or sidewalks due to the hill slope and complex geological conditions on the project site. The extension of Monte Cresta Drive would consist of two 10-foot travel lanes and 2-foot curbs and gutters on either side of the roadway for a total paved road width of 24 feet. According to Geologic and Geotechnical Engineering Feasibility Study for Monte Cresta Drive Road Extension (Romig Engineers, 2018) (provided in Appendix C), the road cannot be extended further than currently proposed (335 feet) due to the presence of unsuitable geological conditions, including unstable soils and evidence of previous landslides. Additionally, a Parking and Sidewalk Exception Request Memo (Lea and Braze Engineering, Inc) (Appendix F) was prepared for the project which requested a deviation from the City's parking and sidewalk requirements due to geotechnical constraints. The memo included analysis of three design options: sidewalk and parking on both sides of the street, sidewalk and parking on one side of the street, and parking and sidewalk on neither side of the street. The comparison included potential impacts related to retaining walls, tree removal, grading, and other constraints. Due to the steep topography and complex geotechnical conditions, it was determined that including parking and sidewalk would result in additional impacts and conflict with the City's guideline on Hillside Road Width Related to Cross Slopes and San Juan Hills Area Plan. It was determined that constructing the road extension no wider than the existing section of Monte Cresta Drive (i.e., no sidewalks or street parking) would further reduce the risk of soil erosion, flooding, and slope deformation.

On-site geologic conditions also dictate the size and placement of the required retaining walls. Retaining walls would be constructed on the upslope (eastern) and downslope (western) sides of the proposed road extension. The retaining walls would consist of concrete or wood, depending on the location. Retaining walls that flank the roadway would be approximately 3 to 6 feet in height. The maximum height of the retaining walls would be 6 feet at the hammerhead turn-around near the southern road terminus. Structural design for the retaining walls would be provided prior to issuance of the grading permit. The proposed road extension would consist of a compacted subgrade overlain by aggregate and concrete asphalt. The thickness of the concrete asphalt and aggregate base would range from 5 to 14 inches, depending on the subgrade condition.

Stormwater runoff from the road extension and adjacent residential parcels would be treated on site prior to being released to a new stormwater retention system. The stormwater retention system would connect to the existing City storm drain on Alhambra Drive which connects to the corrugated pipe that daylights along the downhill slope after Alhambra Drive. The runoff is then diverted along the undeveloped swale to the existing downstream headwall. The

stormwater retention system would connect to the City storm drain system via a new 10-foot easement within Lot 10 and an existing 5-foot easement on the neighboring property (Lots 44, 45, and 46). Stormwater would be treated in two bioretention planters and an earthen swale. The swale would direct runoff from existing residences along Sequoia Way to be treated at the beginning of the proposed roadway extension and drained towards Highgate Avenue. The captured stormwater would prevent ponding and runoff that may destabilize the slopes during and immediately after rain events. The addition of the proposed stormwater runoff system would further reduce the potential for the project to cause a landslide on site or off site.

As noted in Section 1.2.4 Biological Resources, above, approximately 19 trees would be removed (refer to Figure 4Figure 4). Removal of trees and vegetation has the potential to cause erosion, which could destabilize slopes and increase the likelihood of landslides, which would be a significant impact. The project would disturb less than 1 acre and therefore does not require coverage under the Construction General Permit (Order 2009-0009-DWQ). Without adequate BMPs in place, the impact from erosion would be significant. Mitigation Measure GEO-1 requires the applicant to prepare a SWPPP to stabilize soils, including post-construction revegetation. The landslide impact due to erosion and vegetation removal would be less than significant with implementation of Mitigation Measure GEO-1.

The placement, design, and composition of the road extension was determined by geotechnical analysis of the site and the surrounding properties. No on-street parking is included in the project because sidewalk and street parking would significantly increase the height of the required retaining wall, require more extensive grading, and increase the number of trees required for removal. In addition, it was determined that the project as currently proposed would decrease the risk of soil erosion, flooding, and slope deformation. While the project is located near areas known to be prone to landslide, the proposed project avoids the areas that have been historically affected by landslides, and the project includes design features, such as retaining walls, that further reduce the potential for landslides. The project design is subject to review and approval by the City's Public Works and Engineering Department to ensure that the project meets all City design standards and CBC requirements. While the project would be reviewed by the City, the project grading and excavation activities are in a landslide prone area and have the potential to result in substantial adverse effects due to the landslides if the plans and construction were not overseen by a qualified geotechnical engineer and the final design and construction methods did not incorporate all geotechnical recommendations and requirements. Mitigation Measure GEO-2 requires a qualified geotechnical engineer to review the design plans, monitor construction, and verify that geotechnical recommendations are being properly implemented in the field. Because the final design and construction will be reviewed by a geotechnical engineer to avoid creating an unstable geologic condition, the impact from landslides would be less than significant with mitigation.

Future Development of Adjacent Parcels

Future construction of residential properties would be compatible with the underlying zoning and land use designations. Development would conform to the current design provisions of the CBC. Proposed developments would also adhere to the hillside development requirements

contained in the proposed policies, including General Plan Policy 4.4-3, which requires clustered development in the hillside areas to limit exposure to steep slopes; Policy 5.2-1, which encourages that areas with steep slopes remain undeveloped; Policy 6.1-6, which requires geotechnical studies to include analysis of erosion and make recommendations, as warranted; and Policy 6.1-11, which requires the City to support erosion prevention. While the City policy would limit the potential for a landslide, the history of landslides on the site and existing unstable geologic conditions could cause a significant landslide impact due to erosion or structural construction in a manner that would further destabilize the hill slope and threaten structures above or below the new residences. Mitigation Measure GEO-1 requires a project-specific SWPPP to address erosion during and after construction. Mitigation Measure GEO-2 requires geotechnical engineer review of design plans and construction to verify that the development meets geotechnical standards and all geotechnical recommendations are properly implemented in the field. The future development would have a less than significant impact on landslides with mitigation.

Mitigation Measures GEO-1: Prepare Stormwater Pollution Prevention Plan (SWPPP)

A project-specific Stormwater Pollution Prevention Plan (SWPPP) shall be prepared and submitted to the City for review prior to construction. The SWPPP shall be implemented during construction by the project applicant. The SWPPP shall be prepared by a Qualified SWPPP Developer, and SWPPP implementation shall be monitored by a Qualified SWPPP Practitioner. The project-specific SWPPP shall include the following:

- Locations of all proposed temporary and permanent soil and erosion control best management practices (BMPs). BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Construction BMP Handbook or the Caltrans Construction Site BMPs Manual.
- Monitoring and maintenance of all BMPs, including at least annual monitoring for erosion and BMP maintenance, for a period of 3 years and until final slope stabilization has been completed as evidenced by a minimum of 70-percent vegetation cover in disturbed areas.
- All freshly graded slopes and soil surfaces disturbed during construction shall be planted with erosion-resistant vegetation.

Mitigation Measures GEO-2: Geotechnical Engineer

The completed grading, foundation, and retaining wall plans shall be reviewed by a qualified geotechnical engineer for conformance with the recommendations presented in the geotechnical report. The following note shall be added to the engineering and design plans:

"Earthwork, excavation and re-compaction of existing fill, pier drilling, foundation and pavement construction, retaining wall drainage and backfilling, utility trench backfilling, and site drainage should be performed in accordance with the project geotechnical report. A qualified geotechnical engineer shall be notified at least 48 hours in advance of any

earthwork and shall observe and test during earthwork, foundation, retaining wall, and pavement construction as recommended in the geotechnical report."

Earthwork, foundation, retaining wall, and pavement construction shall be observed and tested by a qualified geotechnical engineer to 1) confirm that subsurface conditions are compatible with those used in the analysis and design, 2) observe compliance with the design concepts, specifications, and recommendations, and 3) allow design changes in the event that subsurface conditions differ from those anticipated. Any design changes will be implemented as recommended by the geotechnical engineer and approved by the City based on observed site conditions.

B) Less than Significant Impact with Mitigation.

Road and Utilities Extension

Construction of the project would involve grading and earthmoving activities, which would expose soils at the site and could result in soil erosion. The project would require grading to construct the roadway and flat areas for construction access and staging. Approximately 815 cubic yards of material would be excavated from the area to construct a flat road surface. A total of 225 cubic yards of aggregate and asphalt material and excavated soils would be imported for roadway construction. Approximately 590 cubic yards of excess soil material would be exported from the project site.

Temporary soil exposure would be relatively minor and within an area of less than 1 acre. However, due to the presence of a hill slope with evidence of past erosion and destabilization, the impact of the project on further soil loss is potentially significant. Mitigation Measure GEO-1 requires the applicant to prepare a SWPPP. The SWPPP would contain soil stabilization and sediment control BMPs required to be implemented during construction and after construction for final slope stabilization. With implementation of Mitigation Measure GEO-1, the impact from erosion would be less than significant.

Future Development of Adjacent Parcels

Future construction of residential properties would be compatible with the underlying zoning and land use designations. Any future development would be subject to individual, site-specific review for development standards and building code regulations required by State law and City policy. Development of the parcels would comply with the City of Belmont Design Guidelines (2016) and Zoning Code Section 4.7, which specifies the design requirements for single-family residences in the HRO2 zoning district.

The development of the residential parcels would require vegetation and tree removal, which could cause erosion and loss of topsoil due to the hill slope conditions on the site. While the development would conform to the current design provisions of the CBC and the hillside development requirements contained in the General Plan—including Policy 4.4-3, which requires clustered development in the hillside areas to limit exposure to steep slopes; Policy 6.1-6, which requires geotechnical studies to include analysis of erosion and make recommendations, as warranted; and Policy 6.1-11, which requires the City to support erosion

prevention—the policies are not specific to the project site. The future residential development would disturb less than 1 acre and therefore does not require coverage under the Construction General Permit (Order 2009-0009-DWQ). . Given the history of slope instability on the site, the future residential development could result in increased erosion and a significant impact from topsoil loss if soil and erosion control best management practices were not implemented. Mitigation Measure GEO-1 requires preparation and implementation of a project-specific SWPPP that would include project-specific BMPs to minimize erosion and topsoil loss. The impact would be less than significant with mitigation.

C) Less than Significant with Mitigation

Liquefaction

As discussed in responses (A[iii]) and (A[iv]) above, the project site is not located in an area that is susceptible to liquefaction. The project would have a less than significant impact due to liquefaction.

Landslides

As discussed in response (A[iv]) above, the roadway extension and future residential development would be located in an area that has existing landslides. Both the roadway extension and future residential development have the potential to cause destabilization of the soils and geologic units due to active and recent landslides in the area. The impacts from landslides on and off site is potentially significant. Mitigation Measure GEO-1 requires preparation of a SWPPP to provide soil and erosion control during and post construction. Mitigation Measure GEO-2 requires review and construction monitoring by a qualified geotechnical engineer to ensure the design addresses landslides and avoids causing a landslide. The impact from landslides would be less than significant with mitigation.

Lateral Spreading, Subsidence, and Collapse

Lateral spreading is most common in clay soils. No clay soils occur in the project area, and bedrock is at or near the surface. The project is therefore not susceptible to lateral spreading. The project is not in an area with shallow groundwater or in an area that is susceptible to subsidence. The project is on a hill slope with shallow bedrock, and the geologic units in the project are not susceptible to collapse. The impact from lateral spreading, subsidence, and collapse would be less than significant.

D) Less than Significant Impact

Expansive soils generally occur when saturated clay minerals expand in volume and then shrink in volume when dry. The roadway extension and future development would be located in an area underlain by Fagan loam, Los Gatos loam, and Orthents-Urban land complex. All of the soil types within the project area are considered well drained and have a low potential for expansion. Therefore, since the project is not located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), the project would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

E) No Impact

City sewer lines would be extended along Monte Cresta Drive to provide service to the residential parcels. The project, including the road extension and future residential development, would not include the use of septic tanks. No impacts would occur.

F) Less than Significant Impact

Construction activities such as grading, excavation, and ground-disturbing activities for the road extension and future residential development may result in the accidental destruction or disturbance of paleontological resources. While the likelihood of finding new or undiscovered paleontological resources is limited, since the project would be constructed and involve excavation in undeveloped areas, the possibility of uncovering buried paleontological resources cannot be eliminated. The City's General Plan includes Policy 5.12-1, which requires mitigation for development on sites suspected of being paleontologically significant as well as Policy 5.12-2, which requires that, if paleontological resources are discovered during construction, an evaluation be completed before construction activities resume. Mitigation Measure GEO-3 requires implementation of paleontological resource training and cessation of work if a resource is uncovered, consistent with City policies. With the implementation of Mitigation Measure GEO-3, impacts on paleontological resources would be less than significant with mitigation.

Mitigation Measures GEO-3: Paleontological Resources Sensitivity Training and Inadvertent Discovery

A professional paleontologist shall provide sensitivity training to supervisory staff (construction foreman) to alert construction workers to the possibility of exposing significant paleontological resources within the project area. The training shall be conducted to recognize fossil materials in the event that any are uncovered during construction.

In the event that a paleontological resource is uncovered during project implementation, all ground-disturbing work within a 50-foot radius shall be halted. A qualified paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, a qualified paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, part V. If the resource is determined not to be unique, work may commence in the area. If the resource is determined to be a unique paleontological resource, work shall remain halted and the paleontologist shall consult with City staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation-in-place (i.e., avoidance) is the preferred method of mitigation for impacts to paleontological resources. If preservation-in-place is not feasible and avoidance is not possible, the fossils shall be recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified paleontologist. All recovered fossils shall be curated at an accredited and permanent scientific institution according to Society of Vertebrate Paleontology (SVP) standard guidelines. Work may commence upon completion of treatment.

2.2.8 Greenhouse Gas Emission

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Setting

A greenhouse gas (GHG) emissions analysis is included in the Air Quality Technical Report prepared by RCH Group (Appendix A). The GHG emissions analysis considers both short-term construction and long-term operational impacts associated with a project. BAAQMD has adopted thresholds of significance that were designed to establish the level at which GHG emissions would cause significant environmental impacts under CEQA.

GHG emissions and global climate change are cumulative impacts by nature. GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. Climate change impacts may include an increase in extreme heat days, higher concentrations of air pollutants, sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental impacts. No single project could generate enough GHG emissions to noticeably change the global average temperature. However, the combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts.

City of Belmont Climate Action Plan

The City of Belmont prepared and adopted a Climate Action Plan (CAP) to help achieve compliance with State mandates and focus on feasible actions the City can take to minimize adverse impacts of growth and development to global climate change. The CAP contains the detailed strategies and measures that will be implemented in the City of Belmont to reduce GHG emissions. The City's CAP proposes a 2020 emissions reduction target equivalent to 15 percent below 2005 emissions levels and a 2035 emissions reduction target equivalent to 50 percent below 2005 emissions levels.

BAAQMD Thresholds

The BAAQMD CEQA Guidelines do not identify a GHG emissions threshold for construction-related emissions; however, they do recommend that GHG emissions from construction be quantified and disclosed and a determination regarding the significance of the GHG emissions be made with respect to whether the project in question is consistent with State goals regarding

reductions in GHG emissions. The BAAQMD threshold for operational impacts is 1,100 MT CO_2e per year.

Discussion

A) Less than Significant Impact

Construction

The project would generate GHG emissions from temporary construction-related activities, including from heavy equipment, truck and worker trips, site preparation, and grading. Greenhouse gas emissions for project construction were calculated based on the estimated construction schedule and anticipated equipment use for project construction. Construction activities would generate a total of 98 metric tons (MT) carbon dioxide equivalent (CO_2e). The 30-year amortized construction GHG emissions would be 3 MT CO_2e, which would be less than the BAAQMD operational threshold of 1,100 MT CO_2e per year. Therefore, impacts would be less than significant.

Operation

Operational GHG emissions sources associated with the project include on-road vehicles, landscaping equipment, landfill waste, electricity for building energy and water, and changes to land uses. The estimated annual construction and operational GHG emissions are 46 metric tons of CO_2e per year, which is below the 2030 bright line GHG significance threshold of 660 metric tons per year.

The project would also meet the applicable requirements related to California Solar Mandate and CalGreen, and the City's Energy Reach Codes; including all-electric buildings (no natural gas) with solar panels and prewiring for EV charging per Title 24 unless the project is found to be exempt.[3] Compliance with these requirements would further reduce GHG emissions associated with the project. Therefore, operation of the project would not generate significant GHG emissions and impacts would be less than significant.

B) Less than Significant Impact

Climate Change Scoping Plan

The vehicles used during construction are required to comply with the applicable GHG-reduction programs for mobile sources in accordance with the Climate Change Scoping Plan to achieve the State's GHG reduction targets. The contractor who owns the equipment and vehicles is required to provide verification of compliance to the CARB or the U.S. Environmental Protection Agency (EPA) under State and federal law. The project would conform with relevant programs and recommended actions detailed in the Climate Change Scoping Plan and Mobile Source Strategy. Because the project would not conflict with

[3] As of January 1, 2020, solar panels are required on all new structures built in the state of California per Assembly Bill 178, which outlines the new photovoltaic requirements. California's solar mandate enforces that solar panels are required on all single-family residences and multi-family residences up to three stories high.

regulations adopted to achieve the goals of the Climate Scoping Plan, impacts would be less than significant.

2017 Clean Air Plan
GHG emissions would not exceed the BAAQMD significance threshold for GHGs during construction and operation of the solar array as discussed in response (A), above. Construction and operation of the project would comply with BAAQMD GHG thresholds, which were identified by BAAQMD to achieve the goals of the 2017 CAP. Because the project would not conflict with the 2017 Clean Air Plan, the impact would be less than significant.

City of Belmont Climate Action Plan
The CAP contains the detailed strategies and measures that will be implemented within the City to reduce GHG emissions. The project would comply with all applicable measures in the City's CAP. The project would also comply with Title 24. Because the project would not conflict with regulations adopted to achieve the goals of the City's CAP, impacts would be less than significant.

2.2.9 Hazards and Hazardous Materials

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) 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 it create a significant hazard to the public or the environment?	☐	☐	☐	☐
e) 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?	☐	☐	☐	☒

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☒	☐	☐

Discussion

As used in this section, the term "hazardous material" is defined as any material that, because of its quantity, concentration, 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. As used in this section, the term "hazardous waste" generally refers to a hazardous material that has been used for its original purpose and is about to be discarded or recycled. In California, a hazardous waste is defined as a waste, or combination of wastes that, due to its quantity, concentration, or physical, chemical, or infectious characteristics, may either:

- Cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or
- Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Federal and State regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. The EPA is responsible for administering the Federal Toxic Substances Control Act and Resource Conservation and Recovery Act (RCRA), which regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) is a federal database that records the known hazardous contaminated sites and facilitates remediation actions. The management of hazardous materials and waste within California is under the jurisdiction of CalEPA, which coordinates the State's Unified Program for permitting, inspecting, and enforcing regulations related to hazards materials.

A) and B) Less than Significant Impact

No hazardous substances as defined by the Hazardous Materials Transportation Uniform Safety Act would be used, transported, or disposed of as a part of the project. Project construction would involve the use and transport of typical construction-related hazardous materials such as fuels, lubricants, adhesives, and solvents. No fuel storage or maintenance of heavy equipment would occur on the project site. However, hazardous fluids have the potential to leak from construction vehicles and equipment.

Once construction is completed, the road would be used for vehicle traffic, which also has the potential to leak fluids onto the roadway. Small quantities of hazardous materials (e.g., paints, solvents, oils) could also be stored and used at the residential properties as is common in residential uses. Due to the small number of residential parcels, limited quantities of hazardous materials that are associated with residential uses, and limited area of new road, the potential for an accidental release of hazardous materials on the new road or from the residential development is considered low.

Furthermore, the risk of upset and accident conditions involving the release of hazardous materials into the environment would be reduced through compliance with the federal and State requirements. The project would be carried out in accordance with federal, State, and City regulations for transport, storage, and disposal of hazardous materials. Impacts from hazardous materials during construction and operation would be less than significant.

C) No Impact

The nearest school is Cipriani Elementary School which is located approximately 0.5 mile to the south of the project site. The project does not involve handling of large volumes of hazardous or acutely hazardous substances during construction or operation, as discussed above. Project construction equipment would emit air pollutants including diesel particulate matter from vehicle exhaust and particulate matter from dust emissions. The construction emissions would be limited in quantity over the construction duration and due to the small area of construction and development. Due to the low level of emissions from project construction and because the project is more than 0.25 mile from the nearest school, construction of the project would not expose the school to substantial pollutant concentrations. As such, no impacts would occur.

D) No Impact

The California State Water Resources Control Board operates a data management system, known as GeoTracker, that records for sites that require cleanup, such as Leaking Underground Storage Tank (LUST) Sites, Department of Defense sites, and Site Program Cleanup Program sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including: irrigated lands, oil and gas production, operating permitted Underground Storage Tanks (USTs), and Land Disposal (landfill) sites.

The project site is not located on a site that is included on a list of hazardous materials sites (SWRCB 2022). The nearest known hazardous site is approximately 1 mile from the project site. Additionally, the project is also not located near an identified hazardous site in the City's Safety Element of the General Plan. Therefore, the project would not create a significant hazard to the public or environment. No impact would occur.

E) No Impact

No public airports or public use airports are located within 2 miles of the project site. The nearest airport is the San Carlos Airport located approximately 3 miles east of the project site. No impact would occur.

F) Less than Significant Impact

Road and Utilities Extension

Construction of the project would not impair an adopted emergency response or emergency evacuation plan. Construction equipment and materials would be parked and staged off public roads. Equipment and vehicle staging would occur within private parcels east of the Monte Cresta Drive extension (Lots 19/20, and 21) and west of Monte Cresta Drive, at Lot 10. Areas for construction staging would be graded and cleared of vegetation at the start of construction. Vehicle parking for construction personnel would occur on areas east of the Monte Cresta Drive extension, within Lots 19/ 20, and 21. A construction trailer and portable sanitary facilities would be staged on Lot 19/20. A debris box would be placed on Lot 21 during construction.

Access would always be granted to emergency responders, and road closures would be halted in the event of an emergency to allow safe access. Furthermore, as the adjacent parcels are undeveloped, project construction would not restrict access to the surrounding roadways in the event of an emergency as this section of Monte Cresta Road is not currently used or included in emergency response or evacuation plans. The roadway has been designed for emergency vehicle turnaround at the end of the road to provide emergency access during project operation. As such, impacts would be less than significant.

Future Residential Development

Future development of residences along the extension of Monte Cresta Drive would not impair or interfere with an emergency response or evacuation plan. A maximum of five residences could be built along the extension of Monte Cresta Drive. The future residences would have the ability to exit the site via Monte Cresta Drive, and the additional vehicles from the five residences would not interfere with an emergency response plan. In addition, the residences would be accessed via Monte Cresta Drive, and the extension of Monte Cresta Drive has been designed to provide emergency vehicle access so that emergency access to the future residential development would not be impaired. The impact would be less than significant.

G) Less than Significant with Mitigation Incorporated

Potential fire hazards are addressed in the City's Safety Element of the General Plan. Due to the presence of open space and steep slopes within the city limits, the city is at risk of wildland fires, particularly in the western areas of the city. The City has identified areas that are at high risk of wildfire (i.e., heavily vegetated open spaces often on steep slopes that are close to human development) and has designed these areas as wildland–urban interface (WUI). The main two geographical areas designated as WUI are the canyons common to the Western Hills and the San Juan Canyon.

The project is located at the top of a northwest-facing slope overlooking San Juan Canyon. While the lands north, west, and east of the project are developed with single family residences, the project site and lands south of the project are undeveloped. The lands to the south contain non-native annual grasslands, foothill needlegrass grassland, oak woodland, and ornamental vegetation. San Juan Canyon has been designated as a High Fire Hazard Severity Zone

(HFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). The project site is also located in a HFHSZ.

Road and Utilities Extension
Construction equipment could create sparks and ignite a fire. Other potential fire hazards could include worker behavior such as smoking and disposal of cigarettes as well as parking or driving vehicles and equipment on dry vegetation. Ignition of a wildfire would cause a significant wildfire risk and be a significant impact. Mitigation Measure HAZ-1 requires proper fire hazards training and handling of potential ignition sources including vehicles and cigarettes to reduce the risk of wildfire ignition. The impact from wildfire hazards during construction would be less than significant with mitigation.

The road extension would be relatively flat, and the buried utilities would not affect wind patterns in the project area that would exacerbate wildfire risks. Additionally, two fire hydrants would be installed along the roadway extension and a hammerhead turnaround would be constructed at the terminus of Monte Cresta Drive for fire truck access and turnaround. These improvements would further improve fire response in the area. Therefore, impacts during operation would be less than significant.

Future Development of Adjacent Parcels
Construction of the residential properties would temporarily increase on-site fire risk due to the presence of construction workers and equipment, which could ignite a wildfire. The impact from wildfire ignition would be significant due to the high wildfire risk in the area. Mitigation Measure HAZ-1 requires proper fire hazards training and handling of potential ignition sources including vehicles and cigarettes. Future construction of the residential properties would also comply with the requirements of the San Mateo Consolidated Fire Department (SMCFD) to reduce the risk of fire. The projects would be required to implement a Vegetation Management Plan that would identify all vegetation/ground cover and install a 30-foot-wide buffer zone around the structures. The Vegetation Management Plans would be reviewed by the City and SMCFD for compliance with applicable fire prevention measures. With the implementation a Vegetation Management Plan and Mitigation Measure HAZ-1, the impact from fire hazards during construction would be less than significant with mitigation.

The future residences would be at risk of wildfire due to their location in a HFHSZ. The residential development would involve up to five new residences. The new residences would be accessible from the new fire hydrants along Monte Cresta Drive, and fire engines would be able to access the residential properties via the hammerhead turnaround. Because the residential properties would be accessible with firefighting equipment, the impact from the residential development to wildfire risk would be less than significant.

Mitigation Measure HAZ-1: Fire Prevention Procedures

> The construction contractor shall implement the following fire prevention procedures to reduce the potential risk of fire ignitions during construction:

- Prior to ground disturbing activities, all workers on the project site shall be trained regarding the proper handling and/or storage of materials posing a fire hazard, potential ignition sources (such as cigarettes or sparking equipment), and appropriate types and use of fire protection equipment.
- Fire suppression equipment, including fire extinguishers, water, and shovels, shall be available on-site at all times.
- All ignitions shall warrant a call to the fire department to ensure the ignition is fully extinguished.
- Vehicles shall not be parked in vegetated areas. If vegetated areas must be used for parking, vegetation shall be mowed to a height of less than 4 inches to avoid contact with the underside of vehicles.
- Smoking shall be allowed only inside fully enclosed vehicles with closed windows. Cigarette butts shall be thoroughly extinguished, properly contained, and transported off site for disposal.

2.2.10 Hydrology and Water Quality

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) 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:				
i) result in substantial erosion or siltation on- or off-site;	☐	☒	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) 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; or	☐	☐	☒	☐

iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Setting

City of Belmont Zoning Ordinance

The Belmont Zoning Ordinance, Section 4.7 establishes the HRO2 District, which addresses numerous risks to development on the city's hillsides. Objectives of the HRO2 District include minimizing flood hazards, runoff, and soil erosion incurred from development of hillsides, minimizing the alteration of drainage patterns. Reducing runoff and soil erosion from hillside development also reduces contaminants to surface water and, therefore, development impacts to water quality.

Existing Site Drainage

The project site is located within an underdeveloped area. The proposed project is located south of the intersection of Monte Cresta Drive and Sequoia Way at the top of a northwest-facing slope overlooking San Juan Canyon. The lands north, west, and east of the project are developed with single family residences. Runoff from the project site drains downslope towards San Juan Canyon. The natural ground surface slopes steeply downward from Monte Cresta Drive to the northwest at an inclination of approximately 2:1 (H:V) with locally steeper and flatter areas. Drainage across the site can generally be characterized as uncontrolled sheet flow to the northwest. There are no defined drainage channels or existing stormwater drainage systems on the site.

Groundwater Basin

The project area is located in the Santa Clara Valley Groundwater Basin, San Mateo Subbasin. The groundwater in the Santa Clara Valley Groundwater Basin is not considered a good source of irrigation or municipal water use due to the high content of chloride, sulfate, and total dissolved solids.

Discussion

A) Less than Significant Impact

Construction

Construction of the project would require grading and other earth-disturbing activities. Excavated or imported materials would be stored on the project site. As noted in Section 1.2.9 Hazards and Hazardous Materials response (A), no hazardous substances as defined by the Hazardous Materials Transportation Uniform Safety Act would be used, transported, or disposed of as a part of the project. Project construction would involve the use and transport of typical construction-related hazardous materials such as fuels, lubricants, adhesives, and solvents. No fuel storage or maintenance of heavy equipment would occur on the project site.

However, hazardous fluids have the potential to leak from construction vehicles and equipment. Construction activities could occur before or during rain events, which may result in stormwater runoff releasing chemicals or sediments from the project site to waterbodies in the vicinity. The impact from project-related spills of oils and hydrocarbons on water quality would be less than significant due to the low quantity of such materials used on the site and low risk of release to water bodies.

The project is located in an HRO2 District, and the City has developed measures for HRO2 Districts to minimize flood hazards, runoff, and soil erosion incurred from development of hillsides and minimize the alteration of drainage patterns. Reducing runoff and soil erosion from hillside development also reduces contaminants to surface water and, therefore, development impacts to water quality. Specifically, the project would comply with General Plan Policy 6.1-6, which requires geotechnical studies to include analysis of erosion and make recommendations to control erosion and Policy 6.1-11, which requires the City to support erosion prevention. The project construction would disturb less than 1 acre of land and, therefore, the project applicant would ordinarily not obtain coverage under the Construction General Permit nor prepare a SWPPP. As discussed in Section 1.2.7 Geology and Soils response (A[iv]), above, the project hill slope presents a significant erosion risk, and the geotechnical investigation recommended preparation of a SWPPP to control erosion. Mitigation Measure GEO-1 requires a site-specific SWPPP be prepared to provide soil and erosion control during and post-construction. Implementation of the SWPPP and compliance with the City HRO2 policies would reduce construction impacts on water quality due to sedimentation to less than significant.

Operation

Once construction is completed, the road would be used for vehicle traffic which also has the potential to leak fluids onto the roadway. Small quantities of hazardous materials (e.g., paints, solvents, oils) could also be stored and used at the residential properties as is common in residential uses. Due to the small number of residential parcels, limited quantities of hazardous materials that are associated with residential uses, and limited area of new road, the potential for an accidental release of hazardous materials on the new road or from the residential development is considered low.

Stormwater runoff from the road extension and adjacent residential parcels would be treated on site prior to being released to a new stormwater retention system. The stormwater retention system would connect to the existing City storm drain on Alhambra Drive which connects to the corrugated pipe that daylights along the downhill slope after Alhambra Drive. The runoff is then diverted along the undeveloped swale to the existing downstream headwall. Stormwater would be treated in two bioretention planters and an earthen swale. The swale would direct runoff from existing residences along Sequoia Way to be treated at the beginning of the proposed roadway extension and drained towards Highgate Avenue. As the stormwater would be collected and treated on site, operation and occupancy of the project is not anticipated to substantially degrade surface or groundwater quality. Impacts would therefore be less than significant.

B) Less than Significant Impact

The project would not impact local groundwater supplies as the project would be served by the city's water provider, MPWD, which does not utilize any local groundwater or surface water supplies to serve the city.

The increase in impervious surface from the road and proposed residential properties would be less than 1 acre and is not anticipated to affect groundwater recharge as the project area is on a hillslope underlain by bedrock and is not in a recharge area. A hydrologic evaluation was conducted for the project to address changes in site runoff from increase in impervious surfaces. Runoff captured from the road and lots 19, 20, and 21 would be directed to the new retention system with a meter release. The meter release would be a 2.250" diameter opening allowing ~0.238 cubic feet per second to be released into the storm drain extension and the remaining 0.300 cubic feet per second to be stored within the retention pipes. Releasing 0.238 cubic feet per second within the new proposed storm drain extension will result in reduction of 0.89 cubic feet per second from preexisting runoff conditions. Because the project incorporates stormwater retention into the project design and because the project site is not underlaying by a groundwater aquifer, impacts to groundwater supplies would be less than significant.

C)(i) Less than Significant Impact

Mudflow, also known as a landslide or mudslide, is a flow of dirt and debris that occurs after intense rainfall or earthquakes. The speed of the mudflow is dependent on the amount of precipitation, steepness of slope, and vibration of the ground. The project design, including the extent of the roadway, width of the roadway and absence of parking on street parking, and location and size of retaining walls were determined by a geotechnical engineer to reflect the existing site conditions and risk of landslide and significant soils erosion (refer to Appendix C). Even though the project would disturb less than 1 acre of land, Mitigation Measure GEO-1 requires preparation and implementation of a SWPPP to reduce the risk of erosion during and post construction. Because the project design incorporates geotechnical requirements for slope stabilization, and a SWPPP would be implemented during and post-construction, the project impacts to erosion and siltation would be less than significant.

C(ii) and (iii) Less than Significant Impact

The project will create new impervious surfaces from the road extension and residences. The new impervious surfaces would increase the volume of runoff from the site. Stormwater runoff from the road extension and adjacent residential parcels would be captured and treated on site in a new stormwater retention system prior to being released. The stormwater retention system would connect to the existing City storm drain on Alhambra Drive. The stormwater retention system includes two bioretention planters that slow the rate of stormwater runoff. The stormwater retention system with proposed meter release outlet would capture stormwater runoff and control rate of runoff discharge from the project so that the project does not cause flooding on or off site or exceed the capacity of any stormwater system. The impact from increased stormwater runoff would be less than significant.

C(iv) No Impact

The project is located on a hill slope and is not located in a flood zone. The project would not impede or redirect any flood flows, and no impact would occur.

D) No Impact

The project is located at the top of a hill slope and is not at risk for tsunami inundation. Seiches are defined as wave-like oscillatory movements in enclosed or semi-enclosed bodies of water (such as the San Francisco Bay) caused by sustained high winds or an earthquake. While the San Francisco Bay is approximately 4 miles north and 5 miles east of the purposed project area, the severity of seiche energy would not reach the project area due to the elevation of the site. Therefore, no impacts would occur.

E) No Impact

As noted in response (B), above, the project is located in the Santa Clara Valley Groundwater Basin, San Mateo Subbasin. The project would not impact local groundwater supplies as the project would be served by the city's water provider, MPWD, which does not utilize any local groundwater or surface water supplies to serve the city. As such, the project would not conflict with or obstruct implementation of a Groundwater Management Plan.

MPWD has recently adopted its 2020 Urban Water Management Plan (UWMP). The UWMP will be effective for five years through 2025. The plan also includes an updated Water Shortage Contingency Plan (WSCP). The intent of the UWMP is to provide the Department of Water Resources (DWR) and the general public with information on present and future water supply and demand and to provide an assessment of water resources needed.

The extension of Monte Cresta Drive would provide access to five parcels that may be developed with single-family homes in the future after the roadway and utility improvements have been constructed. The project applicant received a "will serve" letter from MPWD that stated that they would provide service to the project (refer to Appendix D). Given the small size of the project (5 residential parcels), implementation of the project is not anticipated to constrain local water resources or significantly affect water capacity of MPWD. Based on review of the UWMP, MPWD has adequate capacity to serve the project. Impacts from conflicts with a groundwater sustainability plan would be less than significant.

2.2.11 Land Use and Planning

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

b) 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?	☐	☐	☒	☐

Discussion

A) No Impact

Road and Utilities Extension

The project is located in a developed residential neighborhood in the City, as shown on Figure 1 and Figure 2. The lands north, west, and east of the project are developed with single family residences. The project site and lands south of the project are undeveloped.

The purpose of the project is to extend Monte Cresta Drive to provide access to five parcels that may be developed with single-family homes in the future after the roadway and utility improvements have been constructed. The project would improve connectivity of the surrounding streets. Therefore, the project would not physically divide an established community. No impact would occur.

Future Development of Adjacent Parcels

Future construction of residential properties would be compatible with the underlying zoning and land use designations. Development would be limited to the existing parcels so that development would not encroach into the neighboring properties. The project would be consistent with the surrounding development and would not physically divide an established community. No impact would occur.

B) Less than Significant Impact

Road and Utilities Extension

Extension of Monte Cresta Drive was included in the analysis for the City's General Plan. As such, the project is consistent with the City's General Plan. As noted in Section 1.2.4 Biological Resources response (E) above, the project would remove trees that are Principal Native Trees. The project is required to comply with the Belmont Tree Ordinance to address impacts associated with tree removal. The applicant has proposed payment to an in-lieu fee program to comply with the Belmont Tree Ordinance. Due to compliance with the Belmont Tree Ordinance and payment to an in-lieu fee program, there would be no conflict with the Belmont Tree Ordinance. Therefore, the project would not result in 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.

Future Development of Adjacent Parcels

Any future development would be subject to individual, site-specific review for compliance with all development standards and building code regulations required by State law and City policy. Development of the sites would also be required to implement mitigation measures to reduce the impact associated with the removal of trees, including compliance with the Belmont Tree Ordinance. Therefore, the project would not result in 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.

2.2.12 Mineral Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) 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?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

Discussion

A) No Impact

The project site is not within a mineral resource zone established by the State Department of Conservation, and there are no identified important mineral resources on the project site. Furthermore, the project site is surrounded by residential uses that are not compatible with mineral resource extraction activities. No impact would occur.

B) No Impact

The project site is not within a mineral resource area designated by the City's General Plan. The project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur.

2.2.13 Noise

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) 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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

c) 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?	☐	☐	☐	☒

Environmental Setting

Existing Noise Environment

Background noise levels in the project vicinity are generally low and consistent with low-density residential uses. Noise sources include vehicles on Monte Cresta Drive and Sequoia Way. The ambient noise level on the project site is assumed to be typical of a quiet, rural region, between 30 dBA and 50 dBA.

Noise Standards

Federal and State Guidance

CEQA does not specify a numerical threshold for "substantial increases" in noise, and no federal regulations that limit overall environmental noise levels are established; however, federal guidance documents address environmental noise and regulations for specific sources. The EPA published Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety in 1974, which provides information for State and local governments to use in developing their own ambient noise standards. The EPA determined that a day-night sound level of 55 dBA protects the public from indoor and outdoor activity interference.

The EPA, the Federal Highway Administration (FHWA), and the U.S. Department of Transportation (USDOT) have developed guidelines for noise. Under the authority of the Noise Control Act of 1972, the EPA established noise emission criteria and testing methods, published at 40 CFR Part 204, which apply to some construction and transportation equipment (portable air compressors and medium- and heavy-duty trucks). These regulations apply to trucks that would transport equipment to the project site.

City of Belmont Construction Noise Ordinance

The City has the following ordinance as it pertains to construction noise:

> 15-102 Noise limitations
>
> (f) Construction activities are subject to the following regulations: (1) Construction activity noise. All construction and related activities, which require a city permit, including the use of powered equipment in connection with such activities, shall be allowed only during the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday, and 10:00 a.m. to 5:00 p.m. Saturdays. No construction activity or related activities shall be allowed outside of the aforementioned hours or on Sundays and holidays. All gasoline-powered construction equipment shall be equipped

with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted.

Groundborne Vibrations

Vibrating objects in contact with the ground radiate energy through the ground. Vibratory motion is commonly described by identifying the peak particle velocity (PPV). PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage (Caltrans, 2004). Table 2-9 provides the vibratory thresholds for damage to structures, depending on the type of construction. Background vibration levels on the project site are low. Sources include vehicles traveling on Monte Cresta Drive and Sequoia Way. These sources create negligible levels of vibration.

Table 2-9 Construction Vibration Damage Criteria

Building Category	PPV (inch per second [in/sec])
Reinforced-concrete, steel or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Source: (FTA, 2006)

Caltrans recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 in/sec PPV for old buildings or buildings that are documented to be structurally weakened (Caltrans, 2004).

The City does not have established quantitative vibration limits to regulate construction related vibration.

Sensitive Noise Receptors

Sensitive receptors are generally defined as land uses that are the most sensitive to noise intrusion. Sensitive receptors typically include hospitals, schools, libraries, and residences. As shown in Figure 2, residential properties are immediately adjacent to the project. The nearest sensitive receptors are approximately 25 feet to 35 feet from the center of the project site. There are 9 residences located within 100 feet of the project.

Discussion

A) Less than Significant Impact

Road and Utilities Extension

Construction activities would generate a considerable amount of noise in the immediate project vicinity. Noise from vehicles, earth-moving operations, and heavy equipment would result in

elevated ambient and intermittent noise levels. Noise impacts from construction depend on various factors, such as

- the noise generated by various pieces of equipment,
- timing and duration of noise generating activities,
- the distance between construction noise sources and noise-sensitive receptors, and
- the noise environment in which the project would be constructed.

Construction activities have the potential to generate considerable amounts of noise from heavy equipment operation. Noise levels of construction equipment expected to be used during construction are presented in Table 2-10. It should be noted that noise generated during the construction period would be sporadic and vary on a day-to-day basis, depending on the specific activities being undertaken at any given time.

Table 2-10 Construction Equipment Noise Levels

Equipment	L_{max} (dBA) at 50 Feet	L_{eq} (dBA) at 50 Feet
Bulldozer	82	78
Concrete mixer truck	79	75
Dump truck	76	73
Excavator	81	77
Generator	81	78
Power tools	67–89	60–82
Roller	80	73
Telescopic boom lift	75	68
Trencher	72	69

Note:

[a] Based on an estimate, not an actual measurement.

Source: (FHWA, 2006; Ditch Witch; NIOSH, 2011)

Construction activities that occur between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday and between the hours of 10:00 a.m. and 5:00 p.m. Saturday are exempt from additional noise restrictions under the City's noise standards. The project does not propose construction work outside of the City ordinance's daytime construction work-hour limits, and construction would only occur outside of the noise limits in the case of an emergency. Emergency actions are exempt from noise limits. Because the project would only involve construction activities during the City's allowed daytime construction hours, the project construction would comply with the noise ordinance, and construction-related noise impacts would be less than significant.

Once the road extension is complete, the road would support noise that is typical for a residential street, which is consistent with the surrounding conditions. As such, operation of the road is not anticipated to result in an increase in ambient noise levels. Therefore, impacts would be less than significant.

Future Development of Adjacent Parcels

Construction activities for the future residences have the potential to generate considerable amounts of noise from heavy equipment operation, similar to the road and utility extension discussed above. The noise levels of construction equipment expected to be used during construction are presented in Table 2-10. It should be noted that noise generated during the construction period would be sporadic and vary on a day-to-day basis, depending on the specific activities being undertaken at any given time.

Construction activities that occur between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday and between the hours of 10:00 a.m. and 5:00 p.m. Saturday are exempt from additional noise restrictions under the City's noise standards. Construction of the future residential development would comply with the City's noise ordinance, and work outside of the allowed construction hours would only occur in the case of an emergency. Because the construction would occur during the allowed daytime construction hours, construction of the future residential development would comply with the noise ordinance, and construction-related noise impacts would be less than significant.

Once construction is complete, occupancy of the residential properties would produce noise that is typical for a residential neighborhood, which is consistent with the surrounding conditions. On this account, occupancy of the residential properties is not anticipated to result in an increase in ambient noise levels. Therefore, impacts would be less than significant.

B) Less than Significant Impact

Road and Utilities Extension

Project construction would generate perceptible vibration in the immediate vicinity of the project site when heavy equipment or impact tools are used. Vibration levels would vary depending on soil conditions, construction methods, and equipment used. The highest potential vibration levels would occur during construction at the nearest sensitive receptor, located approximately 25 to 35 feet from the center of the project site. At 30 feet, vibratory rolling would typically produce vibration levels of 0.17 in/sec PPV, below the 0.3 in/sec PPV threshold. Vibration levels from all other sources of vibration, including large bulldozers, would be well below the 0.3 in/sec PPV impact threshold for sound structures. Vibratory impacts to structures would be less than significant.

The level at which humans begin to perceive vibration is 0.015 in/sec. Vibrations at 0.2 in/sec are considered bothersome to most people, while continuous exposure to long-term PPV is considered unacceptable at 0.12 in/sec. At a distance of 30 feet from the center of Monte Cresta Drive, the closest receptor may experience bothersome perceived vibration during short-term road work construction activities. Although vibration may be perceptible to the closest receptor

at times, because of the short duration and relative infrequency of events, the impact would be less than significant.

Once the road extension is complete, the road would support ground vibration that is typical for a residential street, which is consistent with the surrounding conditions. On this account, operation of the road is not anticipated to result in a permanent increase in groundborne vibration or groundborne noise levels. Therefore, impacts would be less than significant.

Future Development of Adjacent Parcels

Construction of the residential properties would produce similar ground vibrations to those of road construction. The closest receptor may experience bothersome perceived vibration during short-term residential construction activities. Although vibration may be perceptible to the closest receptor at times, because of the short duration and relative infrequency of events producing groundborne vibration, the impact would be less than significant.

Occupancy of the residential properties would not produce groundborne vibrations. Therefore, impacts would be less than significant.

C) No Impact

No private airstrips are located in the vicinity of the project site. The project site is not located within an airport land use plan or within 2 miles of a public airport. The nearest airport is the San Carlos Airport, located approximately 3 miles east of the project site. No impact would occur.

2.2.14 Population and Housing

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

A) Less than Significant Impact

The extension of Monte Cresta Drive would provide access to five parcels that may be developed with single-family homes in the future after the roadway and utility improvements have been constructed.

Future construction of residential properties would be compatible with the underlying zoning and land use designations. As population and growth projections are based on the zoning and land use designations assigned in the City's General Plan, full development of the sites would have been included in the analysis included in the City's General Plan. As such, the project would not induce unplanned population growth directly or indirectly.

Additionally, given the small size of the additional five low-density residential properties, it is unlikely that the project would result in substantial growth. Impacts would be less than significant.

B) No Impact

The project site is vacant land. No housing is located at the project site or in the vicinity of the project. No existing people or housing would be displaced by the project. No impact would occur.

2.2.15 Public Services

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
15. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Discussion

A) (i – v) Less than Significant Impact

The project site is undeveloped and does not contain any governmental facilities. The project does not include relocation or construction of any governmental or other public facilities.

Future construction of residential properties would be compatible with the underlying zoning and land use designations. Development of the sites would have been considered in the City's

General Plan and included in the City's growth projections. As such, the project would not induce unplanned population growth directly or indirectly. Additionally, given the small population increase from the addition of five low-density residential properties, it is unlikely that the project would affect or constrain existing public services.

Therefore, the project would not create demand for any public facilities and would not cause the need for new or physically altered government facilities. Impacts would be less than significant.

2.2.16 Recreation

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
16. RECREATION.				
a) 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?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐

Discussion

A and B) Less than Significant Impact

No recreational facilities occur in the project area, and the project does not include construction or expansion of any recreational facilities. Future construction of residential properties would be compatible with the underlying zoning and land use designations for the site. Development of the sites would have been considered in the City's General Plan and included in the City's growth projections, which are used to plan recreational facilities at a local and regional level. Given the small population increase from the addition of five low-density residential properties, it is unlikely that the project would affect or cause deterioration of existing recreational facilities. The project would also not cause the need for expansion of recreational facilities. Therefore, the project would not create significant demand for any recreational resources and facilities. Impacts would be less than significant.

2.2.17 Transportation

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

A) Less than Significant Impact

The project is located in a developed residential neighborhood. The proposed project is located south of the intersection of Monte Cresta Drive and Sequoia Way at the top of a northwest-facing slope overlooking San Juan Canyon. Monte Cresta Drive and Sequoia Way are considered local streets for traffic purposes. Local streets are neighborhood streets that provide access to homes and schools with low vehicular speeds, street trees, and street lighting at intersections. The nearest collector is San Juan Boulevard, and the nearest major collector is Cipriani Boulevard.

Road and Utilities Extension

The extension of Monte Cresta Drive would consist of two 10-foot travel lanes and 2-foot curbs and gutters on either side of the roadway for a total paved road width of 24 feet. Retaining walls would be constructed on the upslope (east) and downslope (west) sides of the proposed road extension. Retaining walls that flank the roadway would be approximately 3 to 6 feet in height. The maximum height of the retaining walls would be 6 feet at the hammerhead turn-around near the proposed southern road terminus, which would provide fire truck access and turnaround.

The proposed project does not include any on-street parking or sidewalks due to the hill slope, tree impacts, and complex geological conditions on the project site. On this account, the project is required to obtain an exception to sidewalk and on-street parking requirements from the City. It should be noted that Monte Cresta Drive and Sequoia Way currently do not provide dedicated sidewalks, so a sidewalk for the project would not connect to a local sidewalk network. As the extension would be closed at the end of the road with a hammerhead, the road

extension does not provide additional connectivity to a pedestrian network or provide access to a feature, such as a park. As the project would be consistent with existing conditions, impacts related to sidewalks would be less than significant.

Public transit services in the City are primarily served by SamTrans and Caltrain, providing both local and regional services. Due to the low-density residential nature of the project area, the project is not located near any public transit routes. The nearest SamTrans routes (routes 68 and 62) are located on Cipriani Boulevard. No designated bike routes or multi-use paths are in the project vicinity.

During construction, workers' vehicles and trucks traveling to and from the project site would temporarily increase traffic. Equipment would be staged on site, minimizing the need for daily transport of equipment. Trucks would haul materials to the site and waste off the site. Water trucks would travel to the site periodically. The temporary, minimal increase in traffic would not conflict with City standards for roadways. The impact would be less than significant.

Future Development of Adjacent Parcels
Future residential development would be compatible with the underlying zoning and would be subject to individual, site-specific review for consistency with City policies. Temporary traffic delays on Monte Cresta Drive may occur during construction of the residences due to hauling of construction materials. It should be noted that the residential properties may be constructed on different schedules, which would reduce potential traffic delays and impacts. However, even if the residential parcels were developed at the same time, impacts to the circulation system would be less than significant given the size of the projects, total construction of five residences, and short construction duration. As such, impacts from future residential development would be less than significant.

B) Less than Significant Impact

In accordance with the Technical Advisory on Evaluating Transportation Impacts in CEQA, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of GHG emissions, 2) development of multimodal transportation networks, and (3) a diversity of land uses. The Office of Planning and Research identifies a screening threshold for small land use projects as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer than this threshold may be assumed to cause a less-than-significant transportation impact (Governor's Office of Planning and Research, 2018)

Construction activities would generate vehicle trips from construction workers and delivery vehicles. Given the small size of the project (0.21 acre) and short construction period, the daily number of vehicle trips associated with the project would not exceed 110 trips per day, the Office of Planning and Research's screening threshold for conducting a vehicle miles traveled analysis. Therefore, impacts would be less than significant.

Development of the five project parcels with low-density residential uses would generate fewer than 110 trips per day as the average California household produces approximately 9.2 trips per day (Nustats Research Solutions, 2013). As such, the project would not conflict with CEQA Guidelines 15064.3(b), and impacts would be less than significant.

C) Less than Significant Impact

The extension of Monte Cresta Drive would consist of two 10-foot travel lanes and 2-foot curbs and gutters on either side of the roadway for a total paved road width of 24 feet. The roadway extension includes a hammerhead turnaround at the terminus of Monte Cresta Drive for fire truck access and turnaround.

The project does not include any on-street parking or sidewalks due to the hill slope and complex geological conditions on the project site. As noted in Section 1.2.7 Geology and Soils response (c), above, the placement, design, and composition of the road extension was determined by geotechnical analysis of the site and the surrounding properties. It was determined that, due to the steep slopes located on both sides of the roadway, adding sidewalk and street parking would significantly increase the height of the required retaining wall, require more extensive grading, and increase the number of trees required for removal. In addition, it was determined that the project as currently proposed would decrease the risk of soil erosion, flooding, and slope deformation. While the project is located near areas known to be geologically unstable, the project has been designed to reduce potential impacts to the furthest extent possible.

Furthermore, all plan sets would be reviewed and approved by the City's Public Works and Engineering Department to ensure that the project meets all City design standards and California Building Code (CBC) requirements. Development would conform to the current design provisions of the CBC. The project would also adhere to the hillside development requirements contained in the proposed policies, including General Plan Policy 4.4-3, which requires clustered development in the hillside areas to limit exposure to steep slopes, Policy 5.2-1, which encourages that areas with steep slopes remain undeveloped, and Policy 6.1-6, which requires geotechnical studies to include analysis of erosion and make recommendations, as warranted, and Policy 6.1-11, which requires the City to support erosion prevention.

The road extension would be designed and constructed to meet local, regional, and federal standards and in accordance with geotechnical requirements to avoid a hazardous condition. The project would not introduce any hazards. Impacts would be less than significant.

D) Less than Significant Impact

Construction of the project would not impair an adopted emergency response or emergency evacuation plan. Construction equipment and materials would be parked and staged off public roads. Equipment and vehicle staging would occur within private parcels east of the Monte Cresta Drive extension (Lots 19/20 and 21) and west of Monte Cresta Drive at Lot 10. Vehicle parking for construction personnel would occur on areas east of the Monte Cresta Drive extension, within Lots 19/ 20, and 21.

Access would always be granted to emergency responders, and road closures would be halted in the event of an emergency to allow safe access. Furthermore, as the adjacent parcels are undeveloped, project construction would not restrict access to the surrounding roadways in the event of an emergency as this section of Monte Cresta Road is not currently used or included in emergency response or evacuation plans. The project includes a hammerhead turnaround that has been designed to allow emergency vehicles to access and turn around at the end of Monte Cresta Road. As such, the project would not result in inadequate emergency access, and impacts would be less than significant.

2.2.18 Tribal Cultural Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES				
a) 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:				
i) 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), or	☐	☒	☐	☐
ii) 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. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

A) (i-ii) Less than Significant Impact

No CRHR-eligible or listed resources are located within the project site, as discussed under Cultural Resources responses (a) and (b). No Native American Tribes have formally requested consultation with the City.

The Native American Heritage Commission (NAHC) Sacred Lands File search for the project was negative, indicating there are no known tribal cultural resources in the project area. The

project would not impact a known listed or eligible tribal cultural resource. Previously undiscovered tribal cultural resources could be discovered during excavation and ground-disturbing activities. The impact would be potentially significant. Mitigation Measure TCR-1 requires a professional archaeologist to conduct cultural resources sensitivity training and cessation of work within a 50-foot radius in the event of a cultural resource discovery. The impact to undiscovered eligible tribal cultural resources would be less than significant with mitigation.

Mitigation Measure TCR-1: Tribal Cultural Resources Inadvertent Discovery

The training and Alert Sheet identified under Mitigation Measure CUL-1 shall also encompass tribal cultural resources.

In the event that an archaeological resource is discovered, ground-disturbing work shall be halted within 100 feet of the find and a qualified Tribal Cultural Monitor shall be brought to the site. The qualified Tribal Cultural Monitor shall evaluate the resource and determine whether it is of special importance to a California Native American tribe. If the resource is determined not to be of importance to the tribe, work may commence in the area.

If the resource meets the criteria for an important tribal resource, work shall remain halted within 100 feet of the find, and the qualified Tribal Cultural Monitor shall evaluate the resource and determine whether it is an important resource to the local Native American Tribe. If the resource is important to the tribe, work shall remain halted within 100 feet of the area of the find and the qualified Tribal Cultural Monitor shall consult with City staff regarding methods to ensure that no substantial adverse change would occur to the significance of the tribal cultural resource pursuant to PRC Section 21084.3. Methods may include the following:

- Preservation-in-place (i.e., avoidance) is the preferred method of mitigation for impacts on tribal cultural resources.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource
    - Protecting the traditional use of the resource
    - Protecting the confidentiality of the resource
    - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places
    - Protecting the resource.

Work in the area may commence upon completion of treatment, as approved by the City.

2.2.19 Utilities and Service Systems

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

Water, sewer, electricity, cable, and telephone lines would be extended along Monte Cresta Drive to provide service to the residential parcels. All utility extensions would be located underground and within the road right-of-way. All new storm drain and sewer laterals and associated structures would be public, but privately maintained by the HOA. The providers of utilities and public services for the project are summarized in Table 1-1.

A) Less than Significant Impact

Water

Water would be used during construction for dust suppression, concrete washout, and compaction. Water would either be trucked to the site or provided by MPWD from an existing on-site water pipeline connection. Due to the small scale of the project (0.21 acre), MPWD has sufficient water available to supply water required for construction activities (refer to Appendix D), and no new water treatment facilities would be required.

The project applicant received a "will serve" letter from MPWD that stated that they would provide service to the project (refer to Appendix D). The project would not require the relocation of or otherwise affect any existing water lines. Impacts would be less than significant.

Wastewater

An average of 6 to 10 construction workers is expected to be on site daily during construction (see Table 1-3), with a maximum crew size of 20 workers on site at any one time. Construction of the project would take approximately 9 months to complete. Workers would use temporary and portable restrooms. The restrooms would be serviced by a private company that would dispose of the wastewater at an approved wastewater facility. The amount of wastewater generated by this small number of workers would not exceed wastewater treatment capacity. Construction of the project would not require expanded water or wastewater treatment facilities or the construction of new water facilities.

The City would provide wastewater service to the future residences. The project includes extension of sanitary sewer pipelines to the project site. Wastewater from the existing site is currently not conveyed to the City's public sewer system. The project would include a new 6-inch privately maintained sanitary sewer lineand point of connection to the existing sewer system. The proposed connection would be made by extending 250 linear feet into an existing sewer manhole. The demand for wastewater treatment generated by the five residential parcels would be minimal and consistent with the zoning for the site. The impacts on wastewater treatment would be less than significant.

Stormwater

Stormwater runoff from the road extension and adjacent residential parcels would be treated on site within a stormwater bioretention and separate retention system. The stormwater retention system would connect to the existing City storm drain on Alhambra Drive. Stormwater would be treated in two bioretention planters and an earthen swale. Because the project would retain stormwater flows through the proposed planters, and because the project is only 0.21 acre in size, the project would not affect the capacity of the existing stormwater infrastructure. Impacts would be less than significant.

Electric Power

The project applicant received "will serve" letters from PG&E that stated that they would provide electric service to the project (refer to Appendix D). All electricity lines would be located underground and within the road right-of-way. The electricity lines would connect to the existing network at the terminus of Monte Cresta Drive and Sequoia Way. The project would not require the relocation of or otherwise affect any existing electricity lines. Impacts would be less than significant.

Natural Gas

No natural gas facilities are located within the project site. The project would not require the construction or relocation of any natural gas facilities.

Telecommunication
Telecommunication would be provided by AT&T and Comcast. All telecommunication lines would be located underground and within the road right-of-way. The telecommunication lines would connect to the existing network at the terminus of Monte Cresta Drive and Sequoia Way.

The project applicant received a "will serve" letter from AT&T and Comcast that stated that each company would provide service to the project (refer to Appendix D). The project would not require the relocation or otherwise affect any existing telecommunication lines. Impacts would be less than significant.

B) Less than Significant Impact

Road and Utilities Extension
Water would be used during construction for dust suppression, concrete washout, and other miscellaneous activities. Water would either be trucked to the site or provided by MPWD from an existing onsite water pipeline connection. Adequate water supplies are available under existing and future conditions due to the very minimal volume of water that is required for construction and the short-term water use. Impacts would be less than significant.

Future Development of Adjacent Parcels
MPWD has recently adopted its 2020 UWMP. The intent of the UWMP is to provide the DWR and the general public with information on present and future water supply and demand and to provide an assessment of water resources needed.

The extension of Monte Cresta Drive would provide access to five parcels that may be developed with single-family homes in the future after the roadway and utility improvements have been constructed. Given the small size of the project, implementation of the project is not anticipated to constrain local water resources or significantly affect water capacity of MPWD. Based on review of the UWMP, MPWD has adequate capacity to serve the project during normal, dry, and multiple dry years. Impacts would be less than significant.

C) Less than Significant Impact

Road and Utilities Extension
Refer to the analysis under response (A), above, for a discussion of the need for portable toilets during construction. Given the relatively small workforce and the short-term duration of construction, the project would not exceed wastewater treatment provider capacity, and the impact would be less than significant.

Future Development of Adjacent Parcels
Future construction of residential properties would be compatible with the underlying zoning and land use designations. The City would provide wastewater service for the future residential development. The residential development is consistent with the zoning for the site and General Plan, which is used by the City for planning of wastewater services. The City has adequate capacity to provide wastewater service for the project. Impacts would be less than significant.

D) Less than Significant Impact

The City of Belmont and the County of San Mateo are both members of the South Bay Waste Management Authority (SBWMA), also known as Rethink Waste. In 2010, the City signed a franchise agreement 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.

Road and Utilities Extension
Grading activities during construction of the project could result in disposal of up to 590 cubic yards of cut soil and materials. Construction of the project would generate small volumes of construction waste (e.g., equipment packaging, trash generated by workers). The small quantity of waste generated during project construction would not be in excess of the capacity of nearby landfills. Adequate capacity is available to accommodate the disposal of materials associated with the project. The impact to landfills would be less than significant.

Future Development of Adjacent Parcels
Occupancy of the five low-density residential parcels would not generate enough waste to change capacity projections at a landfill. Sufficient landfill capacity exists to address this irregular source of waste. The City's CAP also includes measures that support diversion and recycling. Specifically, Measure WC1 increases participation in recycling programs and ensures weekly collection of recyclables and organic waste, Measure WC2 mandates recycling by businesses, and Measure WC4 diverts landscaping-related yard waste and food scraps, potentially through banning these organics from landfill. With compliance with existing regulations, impacts would be less than significant.

E) Less than Significant Impact

As described in response (D), above, the City and the County of San Mateo are both members of the SBWMA and have franchise agreements with Recology to receive waste collection, waste reduction, recycling, and composting services.

Road and Utilities Extension
Project construction activities would generate debris that needs to be disposed of, such as equipment packaging and trash generated by workers. Contaminated soils and other materials are not anticipated to be generated because no sources of soil contamination are expected on the project site. The waste material generated during project construction and maintenance debris would be transported to an appropriate disposal location in accordance with federal, State, and local statutes and regulations related to solid waste. Any removed vegetation would be chipped on site or composted.

Development of the adjacent parcels would be required to comply with federal, State, and local statutes and regulations related to solid waste. Furthermore, the General Plan has policies aimed at reducing solid waste (refer to Measures WC1, WC2, and WC3). With compliance with existing regulations, impacts would be less than significant.

Future Development of Adjacent Parcels

Occupancy of the five low-density residential parcels would not generate enough waste to change capacity projections at a landfill. Sufficient landfill capacity exists to address this irregular source of waste. The City's CAP also includes measures that support diversion and recycling. Specifically, Measure WC1 increases participation in recycling programs and ensures weekly collection of recyclables and organic waste, Measure WC2 mandates recycling by businesses, and Measure WC4 diverts landscaping-related yard waste and food scraps, potentially through banning these organics from landfill. With compliance with existing regulations, impacts would be less than significant.

2.2.20 Wildfire

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) 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?	☐	☒	☐	☐
c) 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?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐

Environmental Setting

Wildfire risks and hazards are described in Section 1.2.9 Hazards and Hazardous Materials.

Potential fire hazards are addressed in the City's Safety Element of the General Plan. Due to the presence of open space and steep slopes within the city limits, the city is at risk of wildland

fires, particularly in the western areas of the city. The City has identified areas that are at high risk of wildfire (i.e., heavily vegetated open spaces often on steep slopes that are close to human development) and designed these areas as wildland–urban interface (WUI). The main two geographical areas designated as WUI are the canyons common to the Western Hills and the San Juan Canyon.

The project is located at the top of a northwest-facing slope overlooking San Juan Canyon. While the lands north, west, and east of the project are developed with single family residences, the project site and lands south of the project are undeveloped. The lands to the south contain non-native annual grasslands, foothill needlegrass grassland, oak woodland, and ornamental vegetation.

The San Juan Canyon has been designated as a High Fire Hazard Severity Zone (HFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). The project site is also located in in the HFHSZ. Refer to Figure 6-5 in the City's Safety Element.

Discussion

A) Less than Significant Impact

Road and Utilities Extension

San Mateo County's Area Office of Emergency Services provides planning, preparedness, public information, training, and federal/State intergovernmental emergency services coordination for the cities and unincorporated areas within the County. The City is a member on the Emergency Services Council.

The City responds to disasters in accordance with National Incident Management System (NIMS) at the federal level and the Standardized Emergency Management System (SEMS) at the State level. The City has also developed an Emergency Operations Plan (EOP) that outlines policies and procedures during an emergency. The San Mateo Consolidated Fire Department (SMCFD) coordinates annual fire safety inspections and conducts a Vegetation Management Program (VMP) that aims to reduce the threat of fire in the wildland–urban interface.

Construction of the project would not impair an adopted emergency response or emergency evacuation plan. Construction equipment and materials would be parked and staged off public roads. Equipment and vehicle staging would occur within private parcels east of the Monte Cresta Drive extension (Lots 19/20 and 21) and west of Monte Cresta Drive, at Lot 10. Areas for construction staging would be graded and cleared of vegetation at the start of construction. Vehicle parking for construction personnel would occur on areas east of the Monte Cresta Drive extension, within Lots 19/ 20, and 21. A construction trailer and portable sanitary facilities would be staged on Lot 19/20. A debris box would be placed on Lot 21 during construction.

Access would always be granted to emergency responders in the event of an emergency to allow safe access. Two fire hydrants would also be installed along the roadway extension and a hammerhead turnaround would be constructed at the terminus of Monte Cresta Drive for fire truck access and turnaround. Furthermore, as the adjacent parcels are undeveloped, project

construction would not restrict access to the surrounding roadways in the event of an emergency as this section of Monte Cresta Road is not currently used or included in emergency response or evacuation plans. As such, impacts would be less than significant.

Future Development of Adjacent Parcels
In an event of an emergency, residents of the residential properties would use the newly extended Monte Cresta Drive to access the appropriate evacuation route. Given the small increase in population with development of the five residential parcels, the additional population and subsequent traffic is not anticipated to cause delays or otherwise impact the evacuation of the neighboring residents. Additionally, as part of the road extension, two fire hydrants would be installed along the roadway extension and a hammerhead turnaround would be constructed at the terminus of Monte Cresta Drive for fire truck access and turnaround. These improvements would further improve fire response in the area. Therefore, impacts would be less than significant.

B) Less than Significant with Mitigation Incorporated

Road and Utilities Extension
As noted above in response (A), the project is located at the top of a northwest-facing slope overlooking San Juan Canyon. While the lands north, west, and east of the project are developed with single family residences, the project site and lands south of the project are undeveloped. The lands to the south contain non-native annual grasslands, foothill needlegrass grassland, oak woodland, and ornamental vegetation.

All vegetation within the area of the road extension and construction-access areas would be removed at the start of construction. Approximately 19 trees would be removed. The trees to be removed for project construction are shown in Figure 4.

The project would require grading to construct the roadway and flat areas for construction access and staging. Approximately 590 cubic yards of excess soil material would be exported from the project site. However, construction of the project would not change the slope of the adjacent undeveloped parcels. Furthermore, as the road extension would be relatively flat and low level, construction of the project would not affect wind patterns in the project area such that it would exacerbate wildfire risks. The minor grading on the site would be conducted to create flatter areas for the road and utility extensions. Additionally, two fire hydrants would be installed along the roadway extension, and a hammerhead turnaround would be constructed at the terminus of Monte Cresta Drive for fire truck access and turnaround. These improvements would further improve fire response in the area. Therefore, impacts would be less than significant.

As analyzed under Hazards and Hazardous Materials response (G), there would be a temporary increase in onsite fire risk during construction due to the presence of construction workers and equipment. This temporary increase of wildfire risk could expose construction workers and residents to smoke or harm from a wildfire if one were ignited, resulting in a significant impact. Mitigation Measure HAZ-1 (Fire Prevention Procedures) requires proper fire

hazards training and handling of potential ignition sources, including vehicles and cigarettes, as well as restriction of construction during red flag warnings. Mitigation Measures HAZ-1 would minimize the risk of wildfire and subsequent exposure to wildfire-related harm. Therefore, impacts would be less than significant with mitigation.

Future Development of Adjacent Parcels
Construction of the residential properties would also temporarily increase onsite fire risk due to the presence of construction workers and equipment. As such, implementation of Mitigation Measure HAZ-1 (Fire Prevention Procedures) would be required to reduce construction impacts to a less than significant level.

After development of the site, occupants of the residences would be living on a slope, above a canyon in an area with high wildfire threat. The future occupants of the residences would be at high risk of fire. The new residential development would put people living in those residences at risk of wildfire. Future construction of the residential properties would comply with the requirements of the SMCFD to reduce the risk of fire. The projects would be required to implement a Vegetation Management Plan that would identify all vegetation/ground cover and to install a 30-foot-wide buffer zone around the structures. The Vegetation Management Plans would be reviewed by the City and Belmont Fire Department. With the implementation a Vegetation Management Plan and Mitigation Measure HAZ-1, development of the future residential properties would not exacerbate wildfire risks. Therefore, impacts would be less than significant with mitigation.

C) Less than Significant Impact

Road and Utilities Extension
Water, sewer, electricity, cable, and telephone lines would be extended along Monte Cresta Drive to provide service to the residential parcels. All utility extensions would be located underground and within the road right-of-way. Additionally, two fire hydrants would be installed along the roadway extension, and a hammerhead turnaround would be constructed at the terminus of Monte Cresta Drive for fire truck access and turnaround. As such, the extension of utilities is not anticipated to exacerbate fire risk. Therefore, impacts would be less than significant.

Future Development of Adjacent Parcels
The extension of Monte Cresta Drive would provide access to five parcels that may be developed with single-family homes in the future after the roadway and utility improvements have been constructed. The future residential development would interconnect to the utilities located underground along the extension of Monte Cresta Drive. The future residential development would not install utilities that would exacerbate fire risk. The impact would be less than significant.

D) Less than Significant Impact

As described in Section 1.2.7 Geology and Soils, above, the project was designed with consideration of geologic constraints and to reduce the risk of soil erosion, flooding, and slope deformation. While the project is located near areas known to be prone to landslide, the project as proposed avoids the areas that have been historically affected by landslides, and the project includes design features, such as retaining walls, that further reduce the potential for landslides. If there were a wildfire on the site under existing conditions, the site would be prone to slope failure due to the existing landslides present on the site. The project would introduce infrastructure that would increase the slope stability, such as retaining walls and paving, in the event of a wildfire. The impact on slope instability due to wildfire is therefore less than significant.

2.2.21 Mandatory Findings of Significance

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential 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?	☐	☒	☐	☐
b) Does the project have 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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

A) Less than Significant Impact with Mitigation Incorporated

As described in Biological Resources, construction of the project has the potential to affect special status wildlife and plant species and sensitive habitat communities. Mitigation Measures BIO-1 through BIO-6 have been identified to reduce these impacts to less-than-significant levels. No further mitigation would be required. Construction of the project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The project site consists primarily of coast live oak woodland and foothill needlegrass grassland habitat. This habitat type is common throughout the region. The impact to habitat and wildlife would be less than significant.

The project would not eliminate important examples of major periods of California history and prehistory. No important examples of California history or prehistory are known to occur within the project site. Implementation of identified Mitigation Measures CUL-1 through CUL-3 would avoid significant impacts to any inadvertent discoveries of pre-historic or paleontological resources. The potential impact would be less than significant.

B) Less than Significant with Mitigation Incorporated

The CEQA Guidelines (Section 15130) require a discussion of the cumulative impacts of a project. There are generally two accepted methods of evaluating cumulative impacts: the plan method and the list method. These two approaches are included as part of Section 15130 and state that a cumulative impact analysis must include either 1) a list of past, present, and probable future projects that may contribute to the effects of the project, or 2) a summary of projections contained in an adopted local, regional, or statewide plan, or related planning document that describe or evaluate contributions to a cumulative effect.

The project is located in a developed residential neighborhood in the City. The lands north, west, and east of the project are developed with single family residences while the lands south of the project are undeveloped. There are no current plans to develop the properties to the south. Since the surrounding areas are currently developed and there are no proposed projects in the project vicinity, the plan method is more appropriate to analyze potential cumulative impacts from project implementation.

Potential impacts associated with the cumulative projects are primarily short-term (construction-related). Construction activities could temporarily emit air pollutants and generate noise that could combine with the other projects. The Air Basin is designated as a non-attainment area for ozone and $PM_{2.5}$ under both NAAQS and CAAQS. The Air Basin is also designated as non-attainment for PM_{10} under CAAQS but not NAAQS. The project could have a cumulatively considerable impact on air quality if it either (1) resulted in emissions above the significance thresholds or (2) violated any action in an attainment plan. BAAQMD thresholds for ozone precursor pollutants (ROGs and NO_x) and particulate matter (PM_{10} and $PM_{2.5}$) are the thresholds at which a project would be considered to constitute a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment.

Operation of vehicles and equipment during project construction would emit diesel particulate matter and other criteria air pollutants. The emissions generated during construction of the project would not exceed BAAQMD significance thresholds and the project would not result in a cumulative considerable net increase for any pollutant that is in non-attainment. BAAQMD requires implementation of basic control measures to control fugitive dust. Other cumulative

projects would similarly be required to implement fugitive dust control measures to minimize fugitive dust generation during construction. With the implementation of such measures the project would not contribute to a cumulative impact for fugitive dust emissions.

Extension of Monte Cresta Drive was included in the analysis for the City's General Plan. As such, the project is consistent with the City's General Plan and would not result in unplanned growth. The project would not contribute to a cumulative impact.

C) Less than Significant with Mitigation Incorporated

This IS/MND identifies potentially significant impacts related to: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Tribal Cultural Resources, and Wildfire. Mitigation measures have been identified in the resource impact discussions of this IS/MND to reduce all potentially significant impacts to a less-than-significant level. Impact determinations of "no impact" or "less-than-significant impact" were made for the following environmental issues: Aesthetics, Agriculture and Forestry Resources, Energy, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, and Utilities and Service Systems. Therefore, with implementation of the mitigation measures specified this IS/MND, the proposed project would not result in substantial adverse effects, direct or indirect, on human beings.

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4 List of Preparers

This section lists those individuals who either prepared or participated in the preparation of this IS/MND. The following staff listed in Table 4-1 contributed to this IS/MND.

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