

## 4.1 OTHER RESOURCE TOPICS

As discussed below, it has been determined that there is no substantial evidence that the project would cause significant environmental effects to the following resource topics or that effects on these resources would be mitigated by standard mitigation measures generally incorporated into most project. These resource topics include the following: Agricultural and Forest Resources, Cultural Resources, Geology/Soils, Hazards/Hazardous Materials, Hydrology/Water Quality, Mineral Resources, Population/Housing, Public Services, Recreation, and Utilities/Service Systems. Therefore, no further environmental review of these issues is necessary beyond the discussion below.

During project scoping, it was determined that some issues may have the potential to have adverse impacts on the environment, including: Aesthetics, Air Quality/GHG, Biological Resources, Land Use/Planning, Noise, and Transportation. Analyses of these issues are not included below, as each issue is analyzed in greater depth in other sections of Section 4 (Environmental Impact Analysis) of this Draft EIR.

### 4.1.1 Agriculture and Forest Resources

*The project would not 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.* According to the Farmland Mapping and Monitoring Program (FMMP),<sup>1</sup> the project site is designated as urban or built-up land and does not contain prime farmland, unique farmland, or farmland of statewide importance. Therefore, development of the proposed project would not result in any impacts related to the conversion of important farmland. No significant impact would occur and no further analysis of this issue is required.

*The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.* The project site is designated as Commercial Office in the City of Belmont General Plan and zoned as Executive & Warehouse (E2.2). No lands on the project site are zoned for agricultural use nor is the site subject to a Williamson Act contract.<sup>2</sup> Therefore, development of the proposed project would not conflict with zoning for agricultural use or a Williamson Act contract. No significant impacts would occur and no further analysis of this issue is required.

*The project would not 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)).* As stated above, the project site is designated as Commercial Office in the City of Belmont General Plan and zoned as Executive & Warehouse (E2.2). No lands on the project site are zoned as 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)). Therefore, development of the

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<sup>1</sup> California Department of Conservation, August 2014. *San Mateo County Important Farmland 2012*.

<sup>2</sup> State of California, Department of Conservation, San Mateo County Williamson Act FY 2006/2007.

proposed project would not conflict with zoning forest land, timberland, or Timberland Production. No significant impacts would occur and no further analysis of this issue is required.

*The project would not result in the loss of forest land or conversion of forest land to non-forest use.* As stated above, development of the proposed project would not convert any 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)) to a non-agricultural use. No lands in the vicinity are defined as forest land or Timberland. Therefore, development of the proposed project would not result in any impacts to forest or timberland resources related to conversion to non-agricultural use. No significant impacts would occur and no further analysis of this issue is required.

*The project would not 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.* As stated above, development of the proposed project would not convert any Prime Farmland, Unique Farmland or Farmland of Statewide Importance or any 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)) to a non-agricultural or non-forest use. Moreover, none of the areas surrounding the project site (Ralston Middle School to the west, office uses to the north and east, and Water Dog Lake Park and an open space canyon area to the south) contain forest or timberland. Therefore, development of the proposed project would not result in any impacts to agricultural, forest, or timberland resources related to conversion of farmland to non-agricultural use. No significant impacts would occur and no further analysis of this issue is required.

#### 4.1.2 Cultural Resources

*The project would not cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5.* The project site contains two buildings, one constructed in approximately 1964 (6-8 Davis Drive), and one constructed in approximately 1979 (10 Davis Drive). Neither building is listed on the National Register of Historic Places, California Register, or any local registers.<sup>3</sup> The buildings, a 1- and 2-story commercial building and a concrete tilt-up warehouse, are of a style common to many commercial and warehouse buildings in the region. These buildings have not been assessed for historic significance, but are unlikely to be eligible for the National or California registers because they do not demonstrate any of the required criteria. Though the project would require demolition of the onsite structures and hardscape, the existing buildings are not historic structures and therefore the project would not result in a substantial adverse change in the significance of a historical resource as defined in §15064.5. Implementation of the proposed project would not result in any impacts related to a change in the significance of an architecturally historic resource or result in a substantial adverse change in the significance of a historical resource as defined in § 15064.5. No significant impacts would occur and no further analysis of this issue is required.

*The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.* There are no known archaeological resources on

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<sup>3</sup> City of Belmont. *City of Belmont General Plan Update, Working Paper #1*. March 6, 2015.

the project site.<sup>4</sup> The project site has been developed with commercial and warehouse uses. The site has been disturbed since original grading for construction with excavation (cut) materials deposited over underlying geologic formations. However, as with any project that requires earthmoving or grading activities, there is the possibility that during project construction activities, previously unrecorded archaeological resources could be encountered. As required under CEQA Guidelines § 15064.5(e) and (f), the City will require, as standard conditions of approval, that in the event that archaeological remains are uncovered or in the event that human remains are discovered, the following measures would be undertaken:

CR-1: In the event that subsurface archaeological resources are encountered during demolition, grading, and/or excavation activities, all development shall temporarily cease in these areas until the City's Planning Department is contacted and agrees upon a qualified archaeologist to be brought onto the project site to properly assess the resources and make recommendations for their disposition. Prehistoric archaeological site indicators include obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps). If any findings are determined to be significant by the archaeologist, they shall be subject to scientific analysis; duration/disposition of archaeological specimens as agreed to by the Native American community, land owner, and the City; and a report prepared according to current professional standards. Construction activities would be allowed to continue in other areas.

CR-2: If human remains are encountered, excavation or disturbance of the location shall be halted in the vicinity of the find, and the county coroner contacted. If the coroner determines that the remains are Native American, the coroner shall contact the Native American Heritage Commission. The Native American Heritage Commission shall identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent shall make recommendations regarding the treatment of the remains with appropriate dignity.

These measures would protect any previously undiscovered or unknown archaeological resources. Therefore, no significant impacts would occur and no further analysis of this issue is required.

*The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.* The project site is flat and has been previously graded to allow for construction of the existing buildings. There are no known paleontological resources or unique geological features on the project site. The project site is presently developed for commercial and warehouse use. Therefore, implementation of the proposed project would not result in any impacts related to the destruction of a unique paleontological resource or geologic feature. No significant impacts would occur and no further analysis of this issue is required.

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<sup>4</sup> Ibid.

*The project would not disturb any human remains, including those interred outside of formal cemeteries.* The project site is presently developed for commercial and warehouse use. However, because tribal activity in the region is known to have occurred in areas close to water sources (i.e., creeks, streams, lakes, bays) and woodlands, it is possible that buried human remains could be present due to the project site's general proximity to Belmont Creek and nearby woodlands. As stated above, measure CR-2 prescribes actions in the event that human remains are discovered. No significant impacts would occur and no further analysis of this issue is required.

#### 4.1.3 Geology and Soils

*The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.*

According to the Geotechnical Report prepared for the CSUS project (September 21, 2011), the site is not located within an Alquist-Priolo Earthquake Fault Zone. The project site is located approximately 1.7 miles east of the San Andreas Fault. However, there are no known active or potentially active faults within the City. Therefore, implementation of the proposed project would not result in any impacts related to rupture of a known earthquake fault.

Similar to all other cities in the San Francisco Bay Area, the City is subject to periodic, strong seismic groundshaking. Due to its close proximity, the San Andreas Fault presents the highest potential for severe ground shaking. In the event of a major seismic event (Magnitude 6.7 or greater) on the San Andreas Fault, strong seismic ground shaking would be expected to occur. Though overall chances of Magnitude 6.7 or greater on San Andreas between 2002 and 2031 is 62 percent, the chances of such an event occurring on the San Andreas fault in the San Francisco Peninsula for same time period is 11 percent. In addition, although earthquakes along several active faults in the region could cause moderate to strong ground shaking at the project site, the intensity of earthquake ground motion would depend on the characteristics of the generating fault, distance to the fault and rupture zone, earthquake magnitude, earthquake duration and site specific geologic conditions. However, because final building drawings would be reviewed to ensure compliance with the 2013 California Building Code and construction would be required to meet applicable local building codes, seismically induced ground shaking is not expected to have a substantial adverse effect on the proposed project. Therefore, implementation of the proposed project would not result in any impacts related to strong seismic groundshaking.

Liquefaction refers to the sudden, temporary loss of soil strength during strong ground shaking. This phenomenon can occur where there are saturated, loose, granular (sandy) deposits subjected to seismic shaking. Liquefaction-related phenomena include seismically-induced settlement, flow failure, and lateral spreading. According to the Geotechnical Report, the project site is located in an area with very low potential for liquefaction. No evidence of liquefaction or associated ground failures was identified in the area following the 1989 Loma Prieta earthquake and the site is not currently mapped within a State-designated Liquefaction Hazard Zone. The report concluded that given the medium dense to dense soils and bedrock underlying the site, the potential for liquefaction due to seismic shaking is low, and the potential for lateral spreading and differential settlement due to seismic shaking is also low.

Landslides are not considered a hazard because the surface topography of the project site is relatively flat. The Geotechnical Report concluded that while the southern slope appears stable under both static and seismic conditions, because of the variability of materials present (including the presence of undocumented fill at the top of the slope), the proximity to the San Andreas Fault and probability of strong shaking, and the potential for minor slope instability near the crest of the slope during strong shaking, the project plans should incorporate a minimum engineering setback of 15 feet from the top of slope, which, according to the project geotechnical engineer, would be sufficient to reduce risk from slope instability. The City would review the project plans to ensure compliance with the recommendations of the Geotechnical Report and the 2013 California Building Code. Therefore, the risk of landslide would be less than significant.

*The project would not result in substantial soil erosion or the loss of topsoil.* The project area is relatively flat and the potential for erosion is low. The proposed project would replace existing structures and surface parking lots, but with the exception of the future pool, any cut and fill would be balanced throughout the site (future construction of the pool is anticipated to require approximately 1,400 cubic yards of cut but no fill). Project grading could result in short-term erosion or loss of topsoil; however, because project construction would not substantially change the topography for the site and would result in an decrease in impervious surface area, erosion potential would be minimal. In addition, the project site would comply with the City's grading ordinance, recommendations and standards outlined in the project Geotechnical Report, and standard City conditions of approval (including best management practices for soil and erosion controls and preparation of a stormwater pollution prevention plan), and would limit grading to the drier seasons (April 15 through November 14). Therefore, impacts would be less than significant and no further analysis of this issue is required.

*The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.* The Geotechnical Report identified a small, thin, fill area on the southerly facing slope that could be the result of a potential debris flow. A peer review of the report performed for the City concluded that the undocumented old fill at the top of the slope could represent an area of concern that might warrant removal of existing fill and replacement as engineered fill. The project geotechnical engineer indicated that based on test pits cut through the fill material, the material is medium dense to dense and/or hard and also that it has been in place for approximately 30 years or more with no signs of creep or instability. The geotechnical engineer concluded that because the fill is performing well and is relatively thin, it would have no effect on structures and significant improvements, and that a 15-foot engineering setback for structures and significant improvements would be sufficient to reduce any risk from soil creep. The City would review the project plans to ensure compliance with the recommendations of the Geotechnical Report and the 2013 California Building Code, and this impact would be less than significant.

*The project would not be located on expansive soil, creating substantial risks to life or property.* The Geotechnical Report identified moderately expansive surficial soils on the project site. Expansive soils can undergo volume changes with change in moisture content (shrink and swell) and have the potential to damage foundation systems not designed to resist soil movements. The Geotechnical Report recommended steps to be performed for site demolition, clearing and preparation; fill removal/replacement; compaction requirements; site drainage; and other

considerations. The City would review the project plans to ensure compliance with the recommendations of the Geotechnical Report and the 2013 California Building Code, and this impact would be less than significant.

*The project would not 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.* The project would be connected to the City sewer system and would not use septic tanks. Therefore, there is no impact, and no further analysis is required.

#### 4.1.4 Hazards/Hazardous Materials

*The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.* The project would utilize limited quantities of hazardous materials, such as common cleaning and maintenance materials, pool supplies, and pesticides/herbicides for landscaping, which will be stored, used and disposed of in accordance with applicable regulations. Small amounts of selected chemicals for science classes would be used for educational purposes under the supervision of an instructor trained in the proper use, storage, and disposal of these chemicals. CSUS is subject to and would follow County, State, and federal requirements to minimize exposure and ensure safe use, storage, and disposal of any chemicals, including common cleaning and maintenance materials, and chemicals used in science classes. Based on the amount stored, nature of packaging, materials involved, and the proposed project's required compliance with applicable regulations, the risk of hazard through the routine transport, use, or disposal of hazardous materials is considered less than significant, and no further analysis of this issue is required.

*The project would not 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.* A Phase I Environmental Site Assessment (ESA), dated August 18, 2014, was conducted for the project applicant by AEI Consultants, and no hazardous materials were found to be present on the project site. However, the ESA indicated that, based upon observation during a site reconnaissance or otherwise inferred due to the age of the buildings, there was the possibility that asbestos-containing materials, lead-based paint, and/or mold may be present, which could pose potential risks to workers during the demolition and waste disposal phase of the project.

The following steps are standard procedures required as part of City-, regional-, and State-mandated requirements (and are not mitigations required by this EIR):

Asbestos, PCB, and Mercury. Removal or disturbance of asbestos-containing material (ACM), polychlorinated biphenyls (PCBs) (e.g., transformers), or mercury (e.g., thermostats) during building demolition could expose construction workers and the general public to friable asbestos, PCBs, and/or mercury. Compliance with standard asbestos, PCB, and mercury remediation requirements enforced by the Bay Area Air Quality Management District (BAAQMD), State Division of Occupational Safety and Health (CalOSHA), and State Department of Toxic Substances Control (DTSC), including properly identifying and removing existing ACM, PCBs, and/or mercury prior to demolition activities, would be expected to result in less-than-significant health and safety impacts associated with these materials because the requirements mandate remediation to levels necessary to protect human and environmental health.

Lead-Based Paint. Lead-based paint was commonly used prior to 1960 (and banned in 1979) and may be present in either or both buildings on the project site. If lead-based paint is present and has delaminated (split into thin layers) or chipped from surfaces, airborne lead particles could be released. The project applicant must comply with the standard lead remediation requirements enforced by the City, BAAQMD, CalOSHA, and DTSC to determine if lead-based paint is present and, if present, ensure proper containment and/or removal. Compliance with these established procedures would result in a less-than-significant impact associated with lead-based paint exposure because the requirements mandate remediation to levels necessary to protect human and environmental health.

Mold. Prior to demolition activities, the project applicant should post hazard signage that indicates possible areas that may be affected by mold. Additional areas of mold not already observed during preparation of the ESA may still be present, possibly in pipe chases, heating, ventilation and air conditioning (HVAC) systems and behind enclosed walls and ceilings. In addition to signage, proper engineering controls during building demolition are recommended to protect the health and safety of construction workers in connection with the observed mold.

Radon. Radon is a naturally-occurring, odorless, invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings. The U.S. EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. Though radon sampling was not conducted as part of the ESA, the project site is located in Zone 2 for radon levels, which, according to the U.S. EPA, has a predicted average indoor screening level between 2.0 pCi/L and 4.0 pCi/L. This level is equal to or below the action level of 4.0 pCi/L set forth by the EPA.<sup>5</sup> In order to determine radon levels at a specific location, the EPA recommends site specific testing; however, the ESA has determined that no further action is required at this time.

Also, as explained in section 3.4.3 of this EIR (Project Description), hazardous materials abatement specialists would be necessary for removing any materials in the existing structures prior to any demolition. Any specialists used would comply with all pertinent regulations regarding handling and disposal of these hazardous materials, including City demolition permit requirements. By following the standard procedures required as part of City-, regional-, and State-mandated requirements for handling hazardous materials listed above, impacts would be less than significant and no additional analysis of this issue is warranted in the EIR.

*The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.* The project proposes construction of a new middle school campus and is located adjacent to the Ralston Middle School. However, the project, by its nature would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Any hazardous materials uncovered during demolition are addressed above. Therefore, impacts would be less than significant and no further analysis of this issue is required.

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<sup>5</sup> AEI Consultants. *Phase I, Environmental Site Assessment. Crystal Springs Uplands School 6-8 & 10 Davis Drive Belmont, San Mateo County, California 94002.* August 18, 2014.

*The project is not 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 not create a significant hazard to the public or the environment.* The 2014 ESA prepared for the project applicant identified a 550-gallon diesel underground storage tank (UST) that was removed from the project site in 1999. At the time, two soil samples were collected and analyzed, and no detectable concentrations of contaminants were found. UST removal documentation with the San Mateo County Environmental Health Department (SMCEHD) indicated no groundwater was encountered in the tank pit, no holes in the tank were observed, and no odors detected at the time of the tank removal. Based on the soil sampling analytical results, SMCEHD required no further investigation regarding the UST removal and issued a formal closure letter in 2011.

The GeoTracker and EnviroStor databases show no hazardous materials on the project site. The closest hazardous materials site identified by the databases is located at Ralston Middle School, which as of March 12, 2012 is listed as "Inactive--Needs Evaluation." Therefore, implementation of the proposed project would not create a significant hazard to the public or the environment related to its location on a hazardous materials site. No significant impacts would occur and no further analysis of this issue is required.

*The project would not be 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 for people residing or working in the project area.* The project site is in the C/CAG Revised Airport Influence Area Boundary for San Carlos Airport, Area A, which only requires real estate disclosure. San Carlos Airport is approximately 2.9 miles from the site. Therefore, the project site is not located within two miles of a public airport and no significant impact would occur.

*The project would not be within the vicinity of a private airstrip, nor would the project result in a safety hazard for people residing or working in the project area.* The nearest private airport is the Stanford University Hospital Center Heliport in Palo Alto, approximately 7.3 miles from the project site. The nearest military airport is Moffett Federal Airfield in Mountain View, approximately 15.4 miles from the project site. Therefore the project would not result in a safety hazard for people residing or working in the project area and no significant impact would occur.

*The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.* The project proposes minor changes to interior circulation to accommodate student drop-off and pick-up but would not involve changes to Davis Drive or the existing surrounding arterial street network, including emergency routes. According to the traffic impact study prepared for the applicant by Kimley-Horn Associates (January 12, 2015), emergency vehicle access is currently design for the pickup-drop-off entrance arc. Sight distances, vehicle access, and on-site circulation as currently planned appears generally adequate, but would be subject to refinements as part of the City's design review process. Therefore, there are no direct impacts to emergency response planning. However, the project could result in an increase in congestion on area streets, including streets used for emergency routes. Emergency vehicles have the ability to pass-by traffic through laws requiring that drivers yield to emergency vehicles. Therefore, impacts to emergency routes would be less than significant.

*The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where*

*residences are intermixed with wildlands.* The City of Belmont Fire Hazard map shows the site is located in a Very High Fire Hazard zone. The City has developed a Defensible Space Plan in light of the site's location within an Area of Wildland-Urban Interface and Very High Fire Hazard Severity Zone (VHFHZ). The plan seeks to meet the guidelines described in "General Guidelines for Creating Defensible Space" published by State Board of Forestry and Fire Protection and recommendations provided by the City of Belmont Fire Marshall and includes a Vegetation Management Plan (VMP) as an overlay to the Defensible Space Plan. The project includes a VMP prepared in consultation with the City of Belmont Fire Marshall. This plan will be adopted as part of the project conditions of approval; therefore, this impact would be less than significant.

#### 4.1.5 Hydrology/Water Quality

*The project would not violate any water quality standards or waste discharge requirements.* The project would include demolition of existing buildings and hardscape, and construction of school facilities (including a classroom building, gymnasium a future swimming pool, and related improvements such as a recreational sports field, landscaping, and bioretention areas) and replacement hardscape. Construction period BMPs would ensure the project does not discharge large amounts of polluted water that would violate any water quality standards or waste discharge requirements. The project site currently has approximately 3.61 acres of impervious surface area and the proposed project would reduce impervious surfaces on the project site to approximately 2.81 acres.<sup>6</sup> As stated in the Preliminary On-Site Hydrology/Hydraulic Study prepared for the project (November 21, 2014), the project design includes bioretention areas. These bioretention areas are sized to accommodate project run-off and would overall reduce stormwater runoff to levels less than the current project site. Therefore, impacts would be less than significant and no further analysis of this issue is required.

*The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).* The project would be connected to municipal water supplies and would not use any groundwater supplies. The project site currently has approximately 3.61 acres of impervious surface area and the proposed project would result in a decrease in impervious surfaces on the project site to approximately 2.81 acres.<sup>7</sup> Therefore, the project would allow for an increase in ground water recharge and would not substantially deplete groundwater supplies or interfere with groundwater recharge. No significant impacts would occur and no further analysis of this issue is required.

*The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.* There are no streams or rivers on the site. The project site is relatively level and grading activities would not substantially alter the existing

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<sup>6</sup> ams associates, inc. Preliminary On-Site Hydrology / Hydraulic Study for Crystal Springs Uplands School 6 Davis Drive Belmont, CA 94002. November 21, 2014.

<sup>7</sup> Ibid.

drainage pattern of the site or area. However, the project includes demolition of existing structures and replacement of hardscape. Grading activities required for demolition and construction could expose surface soils to short-term (construction period) erosion that might result in sediment discharges to surface water.

As part of project approval, project construction activities would be required to adhere to the RWQCB requirements and the National Pollution Discharge Elimination System (NPDES). Prior to project demolition and construction activities, the City would require a Storm Water Pollution Prevention Plan (SWPPP) for the project, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SWPPP would detail the treatment measures and best management practices (BMPs) to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of project development. Through the use of bioretention areas, the project would include post-construction BMPs to reduce pollutant loadings in runoff and percolate (e.g., grassy swales, wet ponds, provision of educational materials). The RWQCB and City would enforce compliance with the regulatory requirements of the General Permit, which would control erosion on the project site. Therefore, no significant impacts would occur and no further analysis of this issue is required.

*The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.* There are no streams or rivers on the site. The project site is relatively level and grading activities would not substantially alter the existing drainage pattern of the site or area. However, the project includes demolition of existing structures and replacement of hardscape. The project design includes bioretention areas that would treat stormwater before it empties into the stormwater drainage system. The project would not increase the rate or amount of runoff. No significant impacts would occur and no further analysis of this issue is required.

*The project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems nor provide substantial additional sources of polluted runoff.* The Hydrology/Hydraulic Study calculated project runoff based on 5-year and 10-year storm events. With implementation of the project, including a decrease in impervious areas and construction of bioretention areas, the proposed design is projected to discharge only 3.54 cubic feet per second (cfs) for 5-year storms and 4.66 cfs for 10-year storms to the main stormwater drainage system versus the existing runoff of 6.89 cfs for 5-year storms and 9.28 cfs for 10-year storms, and therefore will reduce runoff.<sup>8</sup> Stormwater runoff from the project would be subject to stormwater detention and treatment requirements. Project bioretention areas would treat stormwater to meet City and RWQCB requirements before it enters the stormwater drainage system. Because there would be no increase in area for polluted runoff and the bioretention system would treat all project stormwater runoff, impacts would be less than significant.

*The project would not otherwise substantially degrade water quality.* The project would include bioretention areas and use best management practices (BMPs) to clean and treat stormwater runoff. Bioretention facilities would consist of a permeable bed, ponding area, organic or mulch

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<sup>8</sup> Ibid.

layer, planting soil, and plants. The City would review the project BMPs and bioretention areas to ensure that runoff from the project site complies with the City's stormwater treatment requirements and would not substantially degrade water quality. Therefore, impacts would be less than significant.

*The project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.* The project site is located in FEMA's Flood Insurance Rate Map Zone X ("Areas determined to be outside the 0.2% annual chance floodplain").<sup>9</sup> The project does not propose construction of housing. Therefore, no significant impacts would occur and no further analysis of this issue is required.

*The project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.* The project site is located in FEMA's Flood Insurance Rate Map Zone X ("Areas determined to be outside the 0.2% annual chance floodplain")<sup>10</sup>. The project does not propose placing structures within a 100-year flood hazard area. Therefore, no significant impacts would occur and no further analysis of this issue is required.

*The project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.* As explained above, the project site is located in Zone X of the FEMA Flood Insurance Rate Map and therefore not within a 100-year flood hazard area. In addition, the project site is not located in an area identified by San Mateo County as subject to flooding from dam failure, nor is the site located near a levee. Therefore, no significant impacts would occur and no further analysis of this issue is required.

*The project site would not be subject to inundation by seiche, tsunami, or mudflow.* Seiches are standing waves created by seismically induced ground shaking (or volcanic eruptions or explosions) that occur in large, freestanding bodies of water. The only water body close enough to the project site that could produce a seiche is Water Dog Lake, located south of the project site but approximately 159 feet lower in elevation than the project site. Tsunamis, or seismic tidal waves, are caused by off-shore earthquakes which can trigger large, destructive sea waves. The project site is not located in an area of tsunami risk, as identified by the San Mateo County tsunami evacuation planning map. Therefore, there would be no significant impact as a result of seiche or tsunami because of the project site is not located sufficiently close to these bodies of water. There would be no significant impact as a result of mudflow because the project site is located on level ground. No significant impacts would occur and no further analysis of this issue is required.

#### 4.1.6 Mineral Resources

*The project would not 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 nor would it 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.* The project site is designated as MRZ-4 ("areas of no known

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<sup>9</sup> Map Number 06081C0168E, October 16, 2012.

<sup>10</sup> Ibid.

mineral occurrences where geologic information does not rule out either the presence or absence of significant mineral resources") by the State Department of Conservation.<sup>11</sup> The project site is not designated by the City Belmont General Plan as an area of mineral resource. Therefore, the project would not 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. Furthermore, as the site is currently developed, the project would not alter its status with respect to the availability of mineral resources. Therefore, the proposed project would not result in any impacts related to the availability of a known mineral resource or a locally-important mineral resource recover site. No significant impacts would occur and no further analysis of this issue is required.

#### 4.1.7 Population and Housing

*The project would not induce substantial 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).* The project does not propose the construction of any new housing. However, the proposed school would serve up to 240 students and employ up to 43 faculty and staff. New students may come from within the City or outside, but it is not likely that students would move to the area just to attend the school as another Crystal Springs campus is located in Hillsborough. Therefore, any demand for new housing would be minor and would not be considered substantial. Also, though the employment of 43 faculty and staff by the school may result in an increase in population growth in the City or surrounding area through the relocation of instructors to the City, instructors may live in any part of the Bay Area and commute to schools where they are employed, so any increase in population as a result of school employment would likely be small, and thus no substantial population growth related to employment would be induced. In addition, it is not likely that construction workers would relocate their place of residence as a consequence of working on the proposed project. Additionally, the project is located adjacent to existing development and would not require new services, roads, or utilities that might induce growth. Therefore, implementation of the project would result in less than significant impacts related to project-induced population growth and no further analysis of this issue is required.

*The project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.* No housing would be removed or impacted to allow construction of the project. No significant impacts would occur and no further analysis of this issue is required.

*The project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.* No people would be displaced to allow construction of the project. Therefore, implementation of the project would not result in any impacts related to the construction of replacement housing. No significant impacts would occur and no further analysis of this issue is required.

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<sup>11</sup> State of California, Department of Conservation, SMARA Mineral Land Classification Maps, Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region.

#### 4.1.8 Public Services

*The project would not result in a substantial adverse physical impact associated with the provision of fire services and the need for new or physically altered fire facilities.* The project proposes demolition of existing buildings and construction of school facilities and buildings, but would not increase the number of structures on the project site. All project structures would be designed to comply with 2013 California Building Code requirements, including fire suppression requirements. All buildings plans would be reviewed by the Belmont Fire Protection District for compliance with these codes, and all buildings would be inspected for code compliance prior to approval of occupancy permits.

The project site is served by the Belmont Fire Department. The Belmont Fire Department examined the proposed school project and concluded that no new or physically altered fire facilities would be required to serve the project site. The Belmont Fire Department determined that existing fire services would be sufficient to serve project needs and therefore, the project would not increase demand for fire protection services at the project site to the extent that new or physically altered fire facilities would be required to serve the project site.<sup>12</sup> Therefore, impacts would be less than significant and no further analysis of this issue is required.

*The project would not result in a substantial adverse physical impact associated with the provision of police services and the need for new or physically altered police facilities.* The project proposes demolition of existing buildings and construction of school facilities and buildings, but would not increase the number of structures on the project site. The project site is served by the Belmont Police Department. The Belmont Police Department examined the proposed school project and concluded that no new or physically altered policies facilities would be required to serve the project site.

The Belmont Police Department determined that existing police services would be sufficient to serve project needs and therefore, the project would not generate demand for police services to the extent that new or physically altered police facilities would be required.<sup>13</sup> Therefore, impacts would be less than significant and no further analysis of this issue is required.

*The project would not result in a substantial adverse physical impact associated with the provision of school services and the need for new or physically altered school facilities.* The project is a new private middle school and would not include substantial employment or population growth that would generate demand for other elementary, middle, or high school facilities that exceeds the capacity of the Belmont-Redwood Shores District and Sequoia Union High School District (Carlmont High School) to serve the City. Therefore, the proposed project would not require the construction of additional new school facilities. No significant impact would occur and no additional analysis of this issue is warranted in the EIR.

*The project would not result in a substantial adverse physical impact associated with the provision of park or recreational facilities, which would require the construction of new parks or result in non-attainment of goals related to the provision of parklands.* Although the project

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<sup>12</sup> Thrasher, Kent, Administrative Battalion Chief, Belmont Fire Department; email communication with Steve Ridone, MIG, Inc.; January 20, 2015.

<sup>13</sup> DeSmidt, Daniel, Chief, Belmont Police Department; email communication with Steve Ridone, MIG, Inc.; January 5, 2015.

would result in new students and employees on a new school campus, it would not be expected to substantially increase the number of residents in the area who would use City park and recreational facilities. Students would likely only use school recreational facilities during school hours and would otherwise not be expected to use any City recreational facility unless they were otherwise City residents. In addition, CSUS intends to share its all-weather soccer field with the City, neighbors and community sports groups, through a joint-use agreement with the Belmont Parks & Recreation Department. Also, CSUS intends to allow community use of the CSUS pool (once constructed) for 20 mutually agreeable days during the CSUS summer break. Therefore, the proposed project would not cause a significant impact with regard to the demand for recreational facilities or parks. No significant impact would occur and no additional analysis of this issue is warranted in the EIR.

*The project would not generate a demand for other public facilities (such as parks or libraries) that exceeds the available capacities.* As stated in the discussion under Population and Housing, the proposed project does not include any residential uses that could directly increase population within the surrounding area and thereby would not directly increase the demands for park or library services. No significant impact would occur and no additional analysis of this issue is warranted in the EIR.

#### 4.1.9 Recreation

*The project would not 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.* The project would result in new students and employees on a new school campus. As discussed above under Public Services, the proposed project would not cause a significant impact with regard to the demand for recreational facilities or parks because students and employees would likely use recreational facilities available on the project site. Therefore, project demand for park services is considered to be less than significant and project impacts on maintenance of those facilities would likewise be less than significant. No significant impact would occur and no additional analysis of this issue is warranted in the EIR.

*The project would not include the construction or expansion of recreational facilities, and therefore would not have a significant impact on the environment.* The project is a private school. The project would allow for shared uses of the playing fields and pool on a set schedule, but does not include public recreational facilities. As discussed above, the project would not be expected to result in demand on City or regional park and recreational facilities that would result in the construction or expansion of new facilities. Therefore, no significant impact would occur and no additional analysis of this issue is warranted in the EIR.

#### 4.1.10 Utilities/Service Systems

*The project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.* The San Francisco Regional Water Quality Control Board (SFRWQCB) enforces wastewater treatment and discharge requirements for properties in the area. The project site is not served by a private on-site wastewater treatment system, but instead conveys wastewater via municipal sewage infrastructure maintained by Silicon Valley Clean Water (SVCW; formerly known as the South Bayside System Authority). As a public facility, SVCW is subject to State wastewater treatment requirements. Wastewater from the project site would therefore be treated according to the wastewater treatment requirements enforced by the SFRWQCB, and no

significant impact would occur. The project would not result in an increase in wastewater for treatment to the extent that treatment requirements could not be met. Therefore, this impact would be less than significant and no additional analysis of this issue is warranted in the EIR.

*The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.* Students and staff on campus would consume water and generate wastewater. The City has identified sewer system improvements in its 2007 Sanitary Sewer Rehabilitation Master Plan and no deficiencies have been identified in the area. CSUS would be required to video and repair the existing sewer line from Davis Drive to Lake Road where it connects to the City main on Lake Road. Additionally, as part of project condition of approval to CSUS would be required to submit a wastewater capacity analysis to confirm that the proposed wastewater generation would not require any new or expanded wastewater facilities beyond the planned sewer lines and laterals typical for new development to connect to the City sewer system. According to a 2013 Capacity Analysis performed for South Bayside System Authority (now SVCW), the sewer system is currently permitted to treat 29 million gallons per day (MGD) of wastewater (average dry weather flow), and as of 2013, treated approximately 12.8 MGD. The project would increase average wastewater flow by a little more than one percent (approximately 18,395 gallons per day).<sup>14</sup> Projected 2040 buildout wastewater flow for SVCW is 16 MGD, with the City of Belmont contribution expected to increase to 1.8 MGD.<sup>15</sup> Therefore, project contribution to City of Belmont wastewater treatment demand would be less than significant, and no additional analysis of this issue is warranted in the EIR.

In addition, the 2013 Capacity Analysis identified capacity-related capital improvement program projects and connection fee estimates as part of short- and long-term capital improvements required to treat expected flow and loading through 2040 while meeting the current National Pollutant Discharge Elimination System (PDES) permit or in anticipation of future NPDES permit that would include nutrient removal.

The project site is served for water supply by the Mid-Peninsula Water District (MPWD). According to 2010 Urban Water Management Plan (UWMP) prepared by MPWD, no new water treatment facilities would be needed to adequately treat water supply to serve project needs.

*The project site would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect.* Project stormwater drainage features would be constructed as part of the project and would be subject to project construction BMPs, including the project Storm Water Pollution Prevention Plan (SWPPP). As discussed in Hydrology/Water Quality above, the

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<sup>14</sup> Average per capita wastewater flow for Belmont (65 gallons per capita [gpc] per day) is based on the October 2013 Capacity Analysis for the South Bayside System Authority. Therefore, an increase in 283 students/faculty/staff would contribute approximately 18,395 gallons per day ( $283 \times 65 \text{ gpc} = 18,395 \text{ gallons per day}$ ). The ABAG 2015 population figure for Belmont is 26,400, which means that 2015 wastewater flow would equal approximately 1.7 MGD ( $26,400 \times 65 \text{ gpc} = 1,716,000 \text{ gallons per day}$ , or approximately 1.7 MGD).  $18,395 \div 1,716,000 = 0.0107$ , or approximately a little more than one percent.

<sup>15</sup> Projected 2040 build-out wastewater flow for Belmont (16 MGD) is based on the October 2013 Capacity Analysis for the South Bayside System Authority (page 2); the projected Belmont wastewater contribution (1.8 MGD) is based on the August 2011 Conveyance System Master Plan, South Bayside System Authority (page 2-18).

project would not result in an increase of impervious surfaces on the site. Runoff on the project site would be reduced from pre-development amounts and treated in bioretention areas, and there would be no need for the expansion of any drainage facilities to serve the project. CSUS would be required to video and repair the existing storm drain line from Davis Drive to Lake Road where it daylight to the canyon. Additionally, as part of project condition of approval CSUS would be required to submit a stormwater capacity analysis confirming proposed site drainage features designed to result in no new net runoff. Therefore, this impact would be less than significant and no additional analysis of this issue is warranted in the EIR.

*The proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.* The project site is served for water supply by the Mid-Peninsula Water District (MPWD). The 2010 Urban Water Management Plan (UWMP) prepared by the MPWD has determined that its guaranteed water supply is 3.891 MGD (although due to current drought conditions, the MPWD has agreed to reduce this amount to 3.71 MGD through at least 2018).<sup>16</sup>

District demand in 2010 was equivalent to 108.6 gallons per capita per day (gcpd). With an increase of 283 students/employees, the project would be expected to increase water demand by approximately 30,734 gallons per day, or approximately 0.8 percent of the District's projected 2015 demand of 3.7 MGD.<sup>17</sup> However, the 2010 UWMP notes that the District demand may exceed its guaranteed water allocation by 2030. The 2015 UWMP is due to the state Department of Water Resources in 2016, and would be expected to address this issue and this impact would be less than significant. Therefore, the project could be served from existing entitlements and no new or expanded entitlements would be required.

*The proposed project would not 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.* The project would result in up to 240 students and 43 staff/faculty on the campus, which, as explained above, would result in an increase of a little more than one percent of the City's wastewater generation. According to a 2013 Capacity Analysis performed for South Bayside System Authority (now SVCW), the sewer system is currently permitted to treat 29 million gallons per day (MGD) of wastewater (average dry weather flow), and as of 2013, treated approximately 12.8 MGD. The project would increase average wastewater flow by a little more than one percent (approximately 18,395 gallons per day).<sup>18</sup> Projected 2040 buildout for SVCW is 16 MGD, with the City of Belmont contribution expected to increase to 1.8 MGD. Therefore, the SVCW treatment facility would have capacity to treat the project's projected demand in addition to its existing commitments. Although the project would generate a small amount of wastewater, this impact would be less than significant and no additional analysis of this issue is warranted in the EIR.

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<sup>16</sup> Mid-Peninsula Water District Urban Water Management Plan (2010), page 27.

<sup>17</sup> The Mid-Peninsula Water District Urban Water Management Plan (2010) estimates daily per capita water demand at 108.6 gallons (page 18). An increase of 283 students/faculty/staff would require approximately 30,734 gallons per day ( $283 \times 108.6 \text{ gpc} = 30,733.80$  gallons per day). The projected 2015 water demand for Belmont is 3.7 MGD (page 26). Therefore, an increase of 30,734 gallons per day would represent an approximately 0.8 percent increase in 2015 water demand ( $30,734 \div 3,700,000 = 0.0083$ , or approximately 0.8 percent).

<sup>18</sup> See footnote #2 above.

*The project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.* Solid waste from the City is taken by Recology San Mateo to Corinda Los Trancos Landfill (formerly known as Ox Mountain Landfill). The project would result in up to 240 students and 43 staff/faculty on the campus, which would result in approximately 226.4 tons per year of solid waste, approximately 1.7% of the City's solid waste total (2013).<sup>19</sup> Corinda Los Trancos Landfill (Ox Mountain) has a permitted maximum disposal of 3,598 tons per day. As of 2011, the landfill had a maximum permitted throughput of 3,598 tons per day. The landfill has a permitted capacity of 69 million cubic yards, with a remaining capacity of slightly less than 27 million cubic yards (26,898,089 cubic yards).<sup>20</sup> However, the closure date is planned for 2018. Therefore, although the project would generate small amounts of solid waste, this impact would be less than significant and no additional analysis of this issue is warranted in the EIR.

*The project would comply with federal, state, and local statutes and regulations related to solid waste.* The project would require the demolition of existing buildings and hardscape on the site. Demolition waste would either be used on-site or separated and trucked to certified recyclers in conformance with CalGreen standards. In addition, CSUS has a recycling program for paper, aluminum, and plastics in place at the existing Hillsborough campus, which would be implemented at the Belmont CSUS campus. All solid waste generated on-site would be required to be disposed of in accordance with all applicable federal and State regulations related to solid waste. No significant impact would occur.

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<sup>19</sup> The CalRecycle waste disposal rate for an educational facility is 0.8 tons per employee per year. An increase of 283 students/faculty/staff would result in approximately 226.4 tons per year ( $283 \times 0.8 = 226.4$ ), which would represent an increase of approximately 1.7 percent of the 2013 Belmont disposal tonnage of 13,105.2 ( $226.4 \div 13,105.2 = 0.0173$ , or approximately 1.7 percent). [2013 Belmont disposal tonnage figure from Cal Recycle "Jurisdiction Disposal by Facility," accessed December 17, 2014: <http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=OriginJurisdictionIDs%3d40%26ReportYear%3d2013%26ReportName%3dReportEDRSJurisDisposalByFacility.>]

<sup>20</sup> CalRecycle, Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mountain).

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