Chapter 18. Other Required California Environmental Quality Act Considerations

18.1 Cumulative Impacts

This section summarizes the cumulative impacts associated with Program implementation. Cumulative impacts would be the same for both the In-System Storage Program and the Full Conveyance Program because the impacts of the two CWP alternatives would be very similar in type, scale, location, and timing.

18.1.1 Introduction

Cumulative impact analysis is an important component of the environmental documentation and approval process, and is required by CEQA. Cumulative impacts could occur when the effects of the CWP are combined with other planned and foreseeable projects such that environmental impacts are more intense or longer in duration.

According to State CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects past projects, the effects of other current projects, and the effects of possible future projects. As stated in State CEQA Guidelines Section 15355, cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. In addition, Section 15130(b) identifies that the following elements are necessary for an adequate cumulative analysis:

- Either:
  - A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or,
  - A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.
- A definition of the geographic scope of the area effected by the cumulative effect and a reasonable explanation of for the geographic limitation used;
- A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative impacts.

Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider that effect significant but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

18.1.2 Cumulative Setting

The geographic scope of the area affected is the City of San Mateo WWTP service area, which encompasses the entirety of the collection system and the WWTP itself. All impacts of both CWP alternatives would occur at specific sites within the service area, and are mostly *construction* impacts that would occur at or near each individual project site. This analysis focuses on construction of CWP projects, because construction

impacts are the most common and widespread impacts expected to occur over the long CWP implementation period.

The cumulative impacts analysis focuses on the environmental resources analyzed in Chapters 3 through 17 of this document. Additional information about the setting for each of these resources can be found in each of the individual resource chapters. The cumulative setting conditions are based on the existing land uses within the service area, which exist as a result of past and present development activity. In addition, consideration was given to new development projects that may occur during the CWP implementation period. Although the exact nature and extent of these future projects is not known, the general character of foreseeable future development is expected to be consistent with approved land use plans that apply to the WWTP service area (primarily the City of San Mateo General Plan) and similar in nature to current development projects. In general, foreseeable future projects are expected to include the following.

- Continued buildout of the Bay Meadows Transit-Oriented Development, which is occurring on 83 acres of the former Bay Meadows racetrack. Most development permits were approved in 2008, and the community is partially built. At buildout, the community is expected to consist of over 1,000 residential units with integrated office and retail sites.
- Redevelopment and general intensification of land uses in the historic Downtown area, consistent with the San Mateo Downtown Area Plan. There are several current development projects that are representative of the types of projects that are reasonably foreseeable, including:
  - Demolition of an existing commercial building and construction of a new 12,500 square-foot building with 25 onsite parking spaces.
  - Construction of a new 52-unit multi-family residential unit with underground parking.
  - Demolition of two medical office buildings and construction of a new 33-unit, four story residential building with underground parking.
  - Demolition of two residential buildings and one commercial building and construction of a new 16-unit multi-family residential building with underground parking.
- Small suburban development projects that are likely to occur throughout the service area, such as new residential units and small neighborhoods, new office and light industrial buildings in existing office parks, freeway-oriented commercial developments (e.g., hotels) along the U.S. Highway 101 corridor.
- Transportation improvements north of Downtown San Mateo consistent with the North Central San Mateo Community-Based Transportation Plan, including capital projects to improve transit stops and pedestrian and bicycle amenities.

No other major, citywide utility repair or capital projects have been identified that compare in scale to the CWP. Consistent with typical utility operations, routine maintenance work and minor capital improvement projects are expected to occur throughout the City; for example, small water pipeline installations, storm drain repairs, and road resurfacing. Some of these activities may occur at the same time as construction of CWP projects; however, the scale of these individual projects would be small.

18.1.3 Cumulative Analysis

The cumulative impacts analysis is based on the analysis of environmental resources in Chapters 3 through 17 of this document, together with the potential effects from the projects discussed above.

18.1.4 Aesthetics

Visible CWP projects would be concentrated in the vicinity of the existing WWTP and Dale Avenue Pump Station. The extent of other potential development in this area is not expected to further degrade views from the KOPs identified in Section 3.2.2.1, as the San Mateo General Plan limits development to the existing office and light industrial business parks in the area. Therefore, there would be no cumulative

impact. Furthermore, all projects that include large, aboveground features would follow the City's processes for design review including the SPAR process. This process would help minimize the potential for aesthetic impacts through local review of architectural design, landscaping, lighting, surface painting, and similar architectural and landscape treatments.

18.1.5 Air Quality

In general, operation of the CWP as well as other potential development would be consistent with the ABAG growth projections used in the preparation of regional air plans (e.g., Bay Area 2010 Clean Air Plan). The extent of potential development in the vicinity of the WWTP and Dale Avenue Pump Station is not expected to further contribute to odor generation. There would be no cumulative impacts as a result of these activities.

Other development in the area may contribute to VOC emissions, but would be subject to BAAQMD permitting requirements for new sources. For all projects occurring throughout the WWTP service area, construction equipment would be required to be licensed for use in California pursuant to ARB emissions standards, and standard dust control measures would be implemented during construction pursuant to the BAAQMD CEQA guidelines. Therefore, the CWP's cumulative contribution to air quality impacts from VOCs and during construction would be reduced to a less than cumulatively considerable level.

18.1.6 Biological Resources

Development of CWP projects would occur in urbanized areas, with little potential for impacts to biological resources, and requires only pre-construction surveys with avoidance and minimization measures. Other potential development projects occurring in nearby areas also would have limited potential for biological resources impacts due to limited habitat present. Although the potential for habitat loss appears to be minimal, there is some potential for localized impacts from construction disturbance in a similar manner as construction of the CWP projects. For this reason, implementation of the CWP projects, in combination with cumulative development, would increase the potential to disturb sensitive biological resources. This is a potentially significant cumulative impact. Pre-construction surveys with avoidance and minimization measures are typically prescribed in these cases consistent with City policies, code provisions, and standard conditions of project approval. With implementation of these measures, the CWP's cumulative contribution to biological resources impacts would be reduced to a less than cumulatively considerable level.

18.1.7 Cultural Resources

Development of CWP projects would occur in urbanized areas that have been previously disturbed; however, previous cultural surveys indicate the likely presence of undisturbed subsurface archaeological deposits in some portions of the City. Implementation of the CWP projects, in combination with cumulative development, would increase the potential to disturb these undiscovered cultural resources. This is a potentially significant cumulative impact. Pre-construction surveys with avoidance and minimization measures are typically prescribed in these cases consistent with City policies, code provisions, and standard conditions of project approval. With implementation of these measures, the CWP's cumulative contribution to cultural resources impacts would be reduced to a less than cumulatively considerable level.

18.1.8 Geology and Soils

Geotechnical impacts related to expansive soils and seismic hazards are site specific rather than cumulative in nature. Like the CWP projects, all development would be subject to uniform site development and construction standards appropriate for regional geology and soil conditions. Therefore, there would be no cumulative impact. For an additional discussion of erosion and sediment control, see Hydrology and Water Quality below.

18.1.9 Greenhouse Gases

In general, operation of the CWP as well as other potential development would be consistent with the ABAG growth projections, and would use electricity from the California power grid. In this manner, all projects are

expected to comply with the RPS and AB 32 scoping plan requirements. There would be no cumulative impacts as a result of these activities.

For all projects occurring throughout the WWTP service area, construction equipment would be required to standard best management practices pursuant to the BAAQMD CEQA guidelines, including minimizing idling times and maintaining equipment in good condition. Therefore, the CWP's cumulative contribution to greenhouse gas impacts during construction would be reduced to a less than cumulatively considerable level.

18.1.10 Hazards and Hazardous Materials

Impacts from hazards and hazardous materials are site specific rather than cumulative in nature. Like the CWP projects, all projects that include the routine use, storage, transport, and disposal of hazardous construction materials would follow DTSC, EPA, OSHA, and San Mateo Fire Department requirements, including preparation of a hazardous communication program, hazardous materials business plan, and spill prevention and countermeasures plan. Therefore, there would be no cumulative impact.

18.1.11 Hydrology and Water Quality

CWP projects that could result in changes in surface runoff patterns would be concentrated in the vicinity of the existing WWTP and Dale Avenue Pump Station. The extent of other potential development in this area is not expected to worsen runoff conditions, as development would be limited to the existing office and light industrial business parks in the area. Therefore, there would be no cumulative impact. Furthermore, all projects that increase impervious surfaces would follow the City of San Mateo Municipal Code stormwater management and discharge requirements (Title 7, Chapter 39, Stormwater Management and Discharge Control).

Development of CWP projects could result in erosion and siltation, with subsequent water quality impacts. This is expected to occur primarily during construction, as almost all operations activities would be contained within the WWTP site where runoff is treated. For all projects occurring throughout the WWTP service area, similar water quality effects could occur during construction and additional effects could occur from rainfall onto developed sites after construction is finished. This is a potentially significant cumulative impact. All projects would follow the San Mateo Countywide Water Pollution Prevention Program, including provisions of its Stormwater Management Plan, including pollution reduction activities for construction sites. Each project would prepare a stormwater pollution prevention plan to address specific, onsite pollutant sources and controls during and after construction. Therefore, the CWP's cumulative contribution to water quality impacts during and after construction would be reduced to a less than cumulatively considerable level.

18.1.12 Land Use

CWP projects with potential land use impacts, including impacts to alternative transportation routes, would be concentrated in the vicinity of the existing WWTP and Dale Avenue Pump Station. The extent of other potential development in this area is not expected to result in land use impacts, as the San Mateo General Plan limits development to the existing office and light industrial business parks in the area. Individual projects, like the WWTP improvements, would be required to follow the City's processes for special use permit and/or design review including the SPAR process. This process would help minimize the potential for land use and community impacts through local review of architectural design, landscaping, lighting, surface painting, and similar architectural and landscape treatments. Therefore, there would be no cumulative impact.

18.1.13 Noise

CWP projects with potential noise impacts during operations would be concentrated in the vicinity of the existing WWTP and Dale Avenue Pump Station. The extent of other potential development in this area is not expected to result in noise impacts, as the area is primarily existing office and light industrial business parks,

which are not sensitive land uses. Individual projects, like the WWTP improvements, would be required to follow the City's processes for special use permit and/or design review, which is expected to include review for consistency with noise standards in Chapter 7.30 of the San Mateo Municipal Code.

CWP projects also include pipeline projects occurring throughout the WWTP service area, construction of which could result in significant and unavoidable noise impacts (see Impact 12-1). Other potential development projects occurring in nearby areas also could result in significant noise impacts. The additional contribution of these other projects occurring at the same time as CWP construction activities could further worsen noise levels and result in a significant cumulative impact. All projects would follow the construction noise restrictions in Chapter 7.30 of the Municipal Code, including weekday and weekend construction hour limits, but it is not clear that impacts could be reduced to a less than cumulatively considerable level. As part of City processes for special use permit and/or design review, the City should consider construction-phase mitigation measures similar to **Mitigation Measure 12-1**, including construction noise minimization measures, noise hotlines, and noise complaint resolution processes. However, these mitigation measures applied to other projects could not reduce the significant and unavoidable impact that results from construction of CWP projects; therefore, the cumulative impact would be significant and unavoidable.

18.1.14 Population and Housing

The CWP would not induce population and housing growth, and would not displace housing or people. Because the project would have no impact, it would not contribute to cumulative impacts.

18.1.15 Public Services

The CWP does not contain features that would increase demand for police, fire, hospital, school, or library service during operations. For example, the CWP would not induce population and housing growth. During construction, some public services could be disrupted from roadway construction (e.g., temporary rerouting of emergency access). However, service disruptions would typically be no more than a few days for a given project. All projects would implement standard measures to coordinate in advance with emergency service providers and other public services and utilities to establish signage and detours to maintain emergency access or otherwise minimize service interruptions. Therefore, there would be no cumulative impact.

18.1.16 Recreation

The CWP does not contain features that would increase demand for recreation facilities during operations. For example, the CWP would not induce population and housing growth. During construction, some recreation facilities could be disrupted from roadway construction and from utility work within parks (e.g., excavation of detention facilities). If an in-system storage basin is constructed under a park, mitigation would offset any loss of use at that park. These types of temporary impacts would be site specific rather than cumulative in nature. Like the CWP projects, all projects would implement standard measures to coordinate in advance with City parks services to ensure that park users are aware of the temporary disruptions. Therefore, there would be no cumulative impact.

18.1.17 Transportation and Traffic

The CWP does not contain features that would increase long-term demand for transportation services and facilities – there would be no population growth inducement and operations (e.g., staff levels) would be similar to existing levels. However, the CWP would increase vehicle use during construction activities, and also would require street and lane closures that would hinder full use of the local transportation system. For all projects occurring throughout the WWTP service area, similar types of transportation effects could occur during construction. This is a potentially significant cumulative impact. All projects would include general safety standards for traffic control, including measures to ensure traffic safety, bicycle and pedestrian access, and coordination with transit and emergency service providers. Therefore, the CWP's cumulative contribution to transportation impacts during construction would be reduced to a less than cumulatively considerable level.

18.1.18 Utilities

The CWP does not contain features that would increase demand for water, solid waste, or wastewater during operations. For example, the program would not induce population and housing growth. Although the CWP would increase electricity use during operation, this increase can be easily accommodated by existing and planned energy supplies. PG&E continues to invest in renewable and conventional energy production and future energy supplies to meet regional energy needs, including those of other potential projects. During construction, some utilities could be disrupted from roadway construction. These types of temporary impacts would be site specific rather than cumulative in nature. Like the CWP projects, all projects would implement standard measures to coordinate in advance with utility providers to avoid or minimize service interruptions. Therefore, there would be no cumulative impact.

18.2 Growth Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires that an EIR identify the likelihood that a proposed project could "foster" or stimulate "…economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The City and its satellite collection systems are subject to Cease and Desist Order No. R2-2009-0020, which requires elimination of sanitary sewer overflows and upgraded sewer capacity. The CWP is necessary to comply with Cease and Desist Order No. R2-2009-0020.

The existing WWTP is permitted to treat an average dry weather flow (ADWF) of 15.7 mgd and currently has sufficient hydraulic capacity to support this flow. The actual current ADWF is approximately 11 mgd (Carollo Engineers Inc., 2014). Existing processes within the WWTP have a treatment capacity of over 15.7 mgd, except for the centrifuges for the biosolids, which have a dry weather capacity of 14.6 mgd (Carollo Engineers, Inc., 2014). Based on the modest population growth expected in the service area and planned for in the local government general plans, the 2035 ADWF is expected to be 13.9 mgd and expansion of the permitted capacity for dry conditions is not anticipated to be needed. Therefore, the permitted ADWF under the CWP would continue to be 15.7 mgd. The CWP would increase the capacity of the WWTP only to collect and treat peak wet weather flows (PWWF) to eliminate SSOs and comply with current and future regulations. Because the permitted ADWF would not change, the CWP is not expected to induce population growth or result in growth inducing impacts.

When fully implemented, the In-System Storage Program would produce water that could be used as recycled water. Recycled water use could offset the use of existing potable supplies and increase the overall availability of water resources, potentially inducing growth. However, the infrastructure does not currently exist to convey and use recycled water. Although there have been discussions with the local water supplier, California Water Service Company (Cal Water), regarding recycled water use, no plans have been prepared or approved by Cal Water to construct recycled water infrastructure. The availability of the treated wastewater is not expected to induce population growth.

18.3 Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) requires agencies to consider to the fullest extent possible irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented. Nonrenewable resources committed during CWP implementation might be irreversible, because commitments of such resources might permanently remove the resources from further use. CEQA requires an evaluation of irretrievable resources to assure that consumption is justified. For example, cultural resources are nonrenewable; therefore, any destruction or loss of those resources is irreplaceable.

Both CWP alternatives would result in use of construction materials that could not be restored (e.g., metal materials; excavation and/or importing of soils and rocks; and energy used to manufacture, transport, or install the new pipelines) and the use of nonrenewable resources (e.g., fuel) to operate construction equipment. In addition, operation of the facilities would result in use of energy resources (e.g., fossil fuels

and electricity) and chemicals. Consumption of these nonrenewable energy resources would be minimal and would not represent a significant impact on irreversible and irretrievable environmental commitments.

18.4 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) requires agencies to describe the significant environmental effects that cannot be avoided if the proposed project is implemented. Based on the analysis in Chapters 3 through 17, two environmental effects were identified as significant and unavoidable:

- Impact 12-1. Construction of the CWP could result in generation of noise levels in excess of standards. On occasion, individual equipment noise may exceed 90 dBA at the property plane, even with mitigation implemented. Impacts from construction would be significant and unavoidable, depending on the equipment type and location used, for the In-System Storage Program, Full Conveyance Program, New Headworks Project, and Primary Clarifier Project.
- Impact 12-3. Implementation of the CWP could generate perceptible offsite vibration. Depending on type, location, and duration of the construction activity including pile driving, vibration impacts may still exceed applicable criteria, even with mitigation implemented. Impacts from construction may be significant and unavoidable for the In-System Storage Program, Full Conveyance Program, New Headworks Project, and Primary Clarifier Project.

All other environmental effects would be mitigated to a less than significant level.

18.5 References

Carollo Engineers, Inc. 2014. *City of San Mateo Integrated Wastewater Master Plan*. Prepared for City of San Mateo. October.