6. CEQA-Required Assessment Conclusions

This chapter provides an overview of the impacts of the proposed project based on the analyses presented in Chapter 4, *Environmental Analysis*, and its subchapters 4.1 through 4.18 of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include impacts found not to be significant, growth-inducing impacts, and significant irreversible changes to the environment. For a more detailed analysis of the proposed project's environmental effects and the proposed mitigation measures to minimize significant impacts, see Chapter 4 and its subchapters 4.1 through 4.18 of this Draft EIR.

6.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that "direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." Chapter 1, *Executive Summary*, contains Table 1-1, *Summary of Significant Impacts and Mitigation Measures*, which summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation. While actions from the proposed project and mitigation measures, where feasible, would reduce the level of impact to less than significant, the following impacts would remain significant and unavoidable after mitigation measures are applied. The identification of these program-level impacts does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the thresholds of significance. As detailed in Chapters 4.2, *Air Quality*, Chapter 4.8, *Hazards and Hazardous Materials*, Chapter 4.11, *Noise*, Chapter 4.15, *Transportation*, and Chapter 4.18, *Wildfire*, of this Draft EIR, environmental impacts associated with the proposed project were found to be significant and unavoidable, as listed:

Air Quality

- Impact AQ-2: Construction of development projects that could occur from implementation of the proposed project would generate emissions that would exceed the Bay Area Air Quality Management District's regional significance thresholds and cumulatively contribute to the nonattainment designations of the San Francisco Bay Area Air Basin.
- Impact AQ-3: Operation of development projects under the proposed project would generate operational emissions that would exceed the Bay Area Air Quality Management District's regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO_x).
- Impact AQ-4: Construction emissions associated with development under the proposed project could expose air quality-sensitive receptors to substantial toxic air contaminant concentrations and exceed the Bay Area Air Quality Management District's project-level and cumulative significance thresholds.

Impact AQ-6: Implementation of the proposed project would generate a substantial increase in emissions that exceeds the Bay Area Air Quality Management District's significance thresholds and would cumulatively contribute to the nonattainment designations and health risk in the San Francisco Bay Area Air Basin.

Noise

- Impact NOISE-1: Buildout under the proposed project is anticipated to result in unacceptable traffic noise with an increase of more than 5.0 dBA L_{dn} over existing conditions along one roadway segment (1st Avenue west of B Street) within the EIR Study Area.
- Impact NOISE-6: Buildout under the proposed project is anticipated to result in unacceptable cumulative traffic noise within the EIR Study Area.

Wildfire

- Impact WILD-2: Development under the proposed project would increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.
- Impact WILD-5: Potential development under the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas, Very High Fire Hazard Severity Zones, or Wildland Urban Interface, result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

6.2 IMPACTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines states:

An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

Development of the proposed project would not result in significant environmental impacts to the environmental impact topics listed below and therefore, are not discussed in detail in Chapters 4.1 through 4.18 of this Draft EIR.

6.2.1 AGRICULTURE AND FORESTRY RESOURCES

Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency categorize most land in San Mateo as Urban and Built-Up Land.¹ There are no agricultural lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the City of San

¹ California Department of Conservation, 2018, California Important Farmland Finder, https://maps.conservation.ca.gov/ DLRP/CIFF/, accessed August 9, 2022.

Carlos. There are no lands under a Williamson Act Contract within San Mateo, and there are no agricultural land uses adjoining the EIR Study Area.² Therefore, approval and implementation of the proposed project would not conflict with lands under Williamson Act contract. For these reasons, there would be no impacts to agricultural or forestry resources under CEQA, and no mitigation would be required.

6.2.2 MINERAL RESOURCES

The California Department of Conservation, Geological Survey classifies lands into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas and are defined as follows:³

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it's judged that little likelihood exists for their presence.
- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- MRZ-3: Areas containing mineral deposits the significance of which cannot be evaluated from available data
- MRZ-4: Areas where available information is inadequate for assignment to any other MRZ zone.

According to the California Department of Conservation, State Mining Geology Board, there are no known significant mineral resources within the EIR Study Area. A majority of San Mateo is categorized as MRZ-1, with the exception of the Coyote Point area at the northern tip of the City, which is categorized as MRZ-3.⁴ Although further exploration within the EIR Study Area could result in the reclassification of specific localities, no mineral resources have been historically exploited or are being currently exploited commercially within the EIR Study Area. As such, these standards have been screened out from further evaluation. Consequently, there would be no impacts to mineral resources as a result of adoption and implementation of the proposed project.

6.3 GROWTH INDUCEMENT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth-inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development.

² County of San Mateo, 2022, Williamson Act Parcels, https://data.smcgov.org/Housing-Development/Williamson-Act-Parcels/sq6e-7j5j#revert, accessed August 9, 2022.

³ California Department of Conservation, State Mining and Geology Board and Division of Mines and Geology, *Guidelines* for Classification and Designation of Mineral Lands,

https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf, accessed August 9, 2022.

⁴ California Department of Conservation, Stinson, M., Manson, M., and Plappert, J., 1982, *Mineral Land Classification Map,* Aggregate Resources Only: San Mateo County.

This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(d) requires, "[it] must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." In other words, negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts consist of growth induced in the region by additional demands for housing, goods, and services associated with the population increase caused by, or attracted to, a new project.

Further, while implementation of the proposed project would induce growth, as discussed in detail in Chapter 4.12, Population and Housing, of this Draft EIR, the proposed project would be consistent with the regional planning objectives established for the Bay Area. While the project itself implements goals, policies, and actions to accommodate the project's projected growth, it would exceed the current population and household forecasts as projected by the Association of Bay Area Governments (ABAG). However, ABAG prepares forecasts of the region's population and employment every two to four years. Amongst other sources, ABAG's projections take into account local planning documents for the ninecounty region, such as the City of San Mateo's General Plan. As such, while the proposed project exceeds the regional projections, both the General Plan and regional forecasts are long-range planning tools that assist local governments to identify policies that address changing environments. Accordingly, following adoption of the proposed project, the regional forecasts would take into account the new growth potential for San Mateo, thereby bringing the two long-range planning tools into better alignment. Additionally, this additional growth would come incrementally over a period of approximately 20 years and a policy framework is in place to ensure adequate planning occurs to accommodate it. The proposed project results in mixed-use development near transportation facilities and employment centers and implements energy and water conservation requirements related to existing and new development, thereby minimizing consumption of non-renewable resources to the extent practicable.

6.3.1 DIRECT IMPACTS

The proposed project is a plan-level document and does not propose any specific development; however, implementation of the proposed project would induce growth by increasing the development potential in the EIR Study Area, as shown in Table 3-1, *Proposed 2040 Buildout Projections in the EIR Study Area*, in Chapter 3, *Project Description*. As shown in Table 3-1, the 2040 forecast for the EIR Study Area is approximately 160,040 total population, 65,180 housing units, 61,140 households, and 79,360 jobs. State law requires the City to promote the production of housing to meet its fair share of the regional housing needs distribution made by ABAG. While the City provides adequate sites to meet its fair-share housing obligations, the additional housing capacity provided by the project would meet the additional demand generated by new job growth. In addition, the proposed General Plan would result in regional benefits by promoting growth that encourages less automobile dependence, which could have associated air quality and greenhouse gas (GHG) benefits. Encouraging infill growth in designated areas would help to reduce development pressures on lands outside the City Limits.

6.3.2 INDIRECT IMPACTS

The proposed project could be considered growth inducing because it includes policies and actions that encourage new growth in the urbanized areas of San Mateo. Development in these areas would consist of infill development on underutilized sites, sites that have been previously developed, and that are vacant or have been determined to be suitable for development or redevelopment. However, infrastructure is already in place in these areas and growth would be required to comply with the City's General Plan, zoning regulations, and standards for public services and utilities. Secondary effects associated with this growth do not represent a new significant environmental impact that has not already been addressed in the individual resource chapters of this EIR. Additionally, population and employment growth would occur incrementally over a period of approximately 20 years and would be consistent with the regional planning objectives established for the Bay Area.

6.4 SIGNIFICANT AND IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires an EIR to discuss the extent to which the proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed herein.

6.4.1 CHANGES IN LAND USE THAT COMMIT FUTURE GENERATIONS

As described in detail in Chapter 3, *Project Description*, of this Draft EIR, the proposed project generally maintains the land use pattern of the existing General Plan. Potential future development under the proposed project is expected to largely occur in ten General Plan Land Use "Study Areas" that are near transit; contain aging shopping centers; or are areas where property owners have expressed interest in considering redevelopment of the property through the General Plan Update process. However, some potential future development may occur on vacant non-urban sites which are already designated for development. Once future development under the proposed project occurs, it would not be feasible to return the developed land to its existing (pre-project) condition. Therefore, there is potential that some of the development allowed under the proposed project would most likely lead to irreversible changes in land use.

6.4.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities; however, compliance with the applicable regulations and proposed General Plan goals, policies, and actions would reduce this potential impact to a less-than-significant level. Therefore, irreversible damage is not expected to result from the adoption and implementation of the proposed project.

6.4.3 LARGE COMMITMENT OF NONRENEWABLE RESOURCES

Implementation of development allowed under the proposed project would result in the commitment of limited, renewable resources, such as lumber and water. In addition, development allowed by the proposed project would irretrievably commit nonrenewable resources for the construction of buildings, infrastructure, and roadway improvements. These nonrenewable resources include mined minerals, such as sand, gravel, steel, lead, copper, and other metals. Future buildout under implementation of the proposed project also represents a long-term commitment to the consumption of fossil fuels, natural gas, and gasoline. Increased energy demands would be used for construction, lighting, heating, and cooling of residences, and transportation of people within, to, and from San Mateo. However, as shown in Chapter 4.5, Energy, and in Section 4.17.1, Water, and Section 4.17.3, Solid Waste, of Chapter 4.17, Utilities and Service Systems, of this Draft EIR, several regulatory measures and proposed General Plan goals, policies, and actions encourage energy and water conservation, alternative energy use, waste reduction, alternatives to automotive transportation, and green building. Future development under the proposed project would be required to comply with all applicable building and design requirements, including those set forth in Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, future development would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. Therefore, while the construction and operation of future development would involve the use of nonrenewable resources, compliance with applicable standards and regulations and implementation of proposed General Plan goals, policies, and actions, and the continuation of the City's Climate Action Plan strategies that would not be substantively changed by the proposed Climate Action Plan update, would reduce the use of nonrenewable resources to the maximum extent practicable. Therefore, the proposed project would not represent a large commitment of nonrenewable resources in comparison to a business-as-usual situation.