2.0 PROJECT REFINEMENTS & RECIRCULATED DRAFT EIR TEXT CHANGES

2.1 INTRODUCTION

This chapter presents minor changes to the project description since the publication of the recirculated draft EIR and revisions that have been made to the recirculated draft EIR as a result of comments received from organizations and individuals on the document. Staff-initiated changes include minor corrections and clarification to the text to correct typographical errors and clarify the project description. None of the changes affect the analysis or conclusions of the recirculated draft EIR.

The changes to the project description do not require recirculation of the EIR because they would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project. Recirculation of an EIR is not required when new information makes insignificant changes to an adequate EIR (CEQA Guidelines Section 15088.5(b)).

2.2 CHANGES TO THE PROJECT DESCRIPTION

The amount of cut and fill (grading) quantities were presented in Section 3.0, Project Description, of the recirculated draft EIR in Table 3.0-3 and in the description of each home site on pages 3.0-28 to 3.0-29. The quantities reported in the recirculated draft EIR accounted for the amount of cut and fill required for the development of driveways and other subdivision improvements but did not include the amount of grading required to construct the building pads to the subfloor elevations shown on the Vesting Tentative Map prepared by BKF Engineers dated December 11, 2009. The applicant has made corrections to the cut and fill quantities to include grading for the building pads, with grading necessary for the driveways, and other subdivision improvements. These are reflected below in **Table 2.0-1, Changes to Proposed Earthwork.** While grading quantities have changed, there is no change to the grading plans presented in the recirculated draft EIR, as these included all grading associated with the subdivision and construction of residences.

As the table shows, the total amount of grading necessary for the project has increased by about 3,000 cubic yards of cut associated mainly with landslide mitigation for lots 5 through 8 and 2,100 cubic yards of fill associated with constructing building pads for lots 1 through 4. The additional cut is necessary in order to remove the existing unconsolidated landslide material on these lots. While the proposed homes will be founded on pier and grade beam foundations, the additional fill will be necessary for the creation of flat areas on the lots for access, play, landscaping, etc. It should be noted that the proposed import for

the project under this design has decreased from 2,200 cubic yards to 700 cubic yards (not including 200 cubic yards of drain rock).

None of the other attributes of the project, including project footprint, locations of the home sites, and staging, have changed.

Table 2.0-1
Changes to Proposed Earthwork

Area	Originally Proposed Cut (cy)	Revised Cut (cy)	Change	Originally Proposed Fill (cy)	Revised Fill (cy)	Change
Lots 1–4	500	500	0	200	2,300	+2,100
Lots 5–8	1,000	4,700	+3,700	1,000	700[1]	-300
Lots 9 and 10	900	300	-600	2,900	2,900	0
Lot 11	1,300	1,200	-100	1,300	1,000	-300
TOTAL	***3,700***	***6,700***	***+3,000***	***5,900***	***7,600***	***+1,700***
Import	**2,200**	**900**	**-1,300**			

[1]Includes 200 cubic yards of drain rock.

2.3 ENVIRONMENTAL ANALYSIS

The changes to the proposed development project described above are evaluated below to determine whether they would result in a new significant impact or increase the severity of previously disclosed impacts of the project. As the analysis shows, the changes to the grading quantities would not result in additional significant environmental impacts not addressed in the recirculated draft EIR or increase the severity of previously identified environmental impacts. No new mitigation measures are required.

Aesthetics

Although the cut and fill quantities provided in the recirculated draft EIR have been revised, the base elevations and locations of the home sites and all other subdivision improvements discussed and evaluated in the recirculated draft EIR remain unchanged. Therefore, Impacts AES-1 through AES-4, which are based on home elevations and locations, remain unchanged and the same mitigation and improvement measures apply to the proposed project.

Biological Resources

The changes to the cut and fill quantities do not alter the project footprint as presented in the recirculated draft EIR. Therefore, Impacts BIO-1 through BIO-11 remain unchanged and the same mitigation measures still apply to the proposed project.

Geology and Soils

The analysis of impacts related to geology and soils provided in the recirculated draft EIR focuses on the locations of the proposed homes and subdivision improvements relative to landslides, unstable geologic units, and other potential geologic hazards. As the locations of the proposed homes and subdivision improvements remain unchanged, Impacts GEO-1 through GEO-6 remain unchanged and the same mitigation measures apply to the proposed project.

Other Resource Topics

Global Climate Change

The changes in grading quantities do not affect the project's estimated construction greenhouse gas emissions as the emissions that were estimated using URBEMIS2007 are based on the amount of total disturbed acreage which has not changed. Therefore, Impact GCC-1 remains unchanged.

Air Quality

The changes in grading quantities do not affect the project's estimated construction emissions as the emissions that were estimated using URBEMIS2007 are based on the amount of total disturbed acreage which has not changed. Therefore, Impact AQ-1 remains unchanged.

Noise

If all the proposed homes are constructed concurrently, the change in grading quantities would reduce project noise impacts as less imported fill would be required than previously analyzed (about 1,300 cubic yards less than before of fill would be imported). Approximately 75 truck trips would be involved in the transport of 900 cubic yards of imported fill compared to 183 truck trips for the transport of 2,200 cubic yards of imported fill analyzed in the recirculated draft EIR. Assuming that five truck trips to import fill could be completed daily, the total site import process could be completed within three weeks rather than four to five weeks as previously analyzed. Therefore, the noise impacts from truck traffic associated with site grading would be less than previously analyzed.

If the proposed home sites are constructed one at a time, the homes on lots 9 and 10 would require a net import of 2,600 cubic yards of fill, which exceeds the 2,200 cubic yards previously analyzed in the recirculated draft EIR by approximately 18 percent, and would result in 217 truck trips compared to 183 truck trips analyzed in the recirculated draft EIR. However, this small increase in truck traffic (34 truck trips) would not substantially increase the noise impact because typically it takes a substantial increase in traffic to increase noise levels by a perceptible amount (such as a doubling of traffic volumes for a 3 decibel increase). Furthermore, the additional 34 truck trips would occur over the course of several weeks during grading activities. Mitigation Measure NOI-1 would still apply to the proposed project, which would reduce Impact NOI-1 to a less than significant level with mitigation.

Hazards and Hazardous Materials

The changes in cut and fill quantities do not alter the project footprint as presented in the recirculated draft EIR or increase the risk of exposure to hazardous materials. Therefore, Impacts HAZMAT-1 and HAZMAT-2 remain unchanged and the same mitigation measures apply to the proposed project.

Transportation

If all of the homes are constructed concurrently, the change in grading quantities would reduce construction-related traffic impacts as less imported fill would be required than previously analyzed. Approximately 75 truck trips would be involved in the transport of 900 cubic yards of imported fill compared to 183 truck trips for the transport of 2,200 cubic yards of imported fill. Assuming that five truck trips to import fill could be completed daily, the total site import process could be completed within three weeks rather than four to five weeks as previously analyzed. Therefore, the number of daily truck trips would remain the same but the duration of truck activity would be shorter and the less than significant traffic impacts from truck traffic associated with site grading would be experienced over a shorter period of time than previously analyzed.

If the homes were constructed one at a time, lots 9 and 10 would require a net import of 2,600 cubic yards of fill, which exceeds the 2,200 cubic yards previously analyzed by approximately 18 percent and would result in 217 truck trips compared to 183 truck trips analyzed in the recirculated draft EIR. However, this small increase in truck traffic (34 truck trips) does not present a substantial increase in the traffic impact from what was previously analyzed. Even with this increase, the project's daily construction truck trips would be substantially less than the daily vehicle trips from project operation, and as the analysis in the recirculated draft EIR shows, project operations would not result in a significant traffic impact. Improvement Measure TRANS-1 would still apply to the proposed project such that truck trips would not occur during peak traffic hours and Impact TRANS-1 would still be less than significant.

Utilities and Service Systems

The changes to the cut and fill quantities would not change the project's demand for utilities and service systems. Impacts UTIL-1 through UTIL-3 remain unchanged and the same mitigation measures still apply to the proposed project.

Hydrology and Water Quality

The changes to the cut and fill quantities do not change the grading plans as presented in the recirculated draft EIR nor the locations of undeveloped land that would be converted to impervious surfaces with implementation of the proposed project from what was previously analyzed. Grading activities would still be required to comply with the NPDES permit requirements and the County's Municipal Code requirements that regulate water quality during construction of the proposed project. The project's impacts remain unchanged.

Land Use and Planning

The revised cut and fill quantities do not change the project's consistency with local land use plans, policies, or regulations from what was previously analyzed. The project's impacts remain unchanged.

Public Services

The changes to the cut and fill quantities do not change the project's demand for public services including public transit, schools, parks, police protection, fire services, hospitals, or public utilities. The project's impacts remain unchanged.

Cultural Resources

The locations of areas to be graded as presented in the recirculated draft EIR remain unchanged although cut and fill quantities have changed. Therefore, the project's potential impacts to cultural resources remain unchanged.

Resource Management District Zoning Text Amendment

The changes to the cut and fill quantities do not affect the analysis of the proposed Resource Management District zoning text amendment. The text of the proposed amendment as well as the project's compliance with the proposed amendment remain unchanged.

Growth Inducement

The changes to the cut and fill quantities do not affect the project's potential for growth inducement as the total amount of development and population associated with the project remains unchanged.

Alternatives

The analysis of alternatives to the proposed project is not affected because as explained above, the changes to the cut and fill quantities would not result in new environmental impacts or increase the severity of previously analyzed impacts. Therefore, there is no need for analysis of additional alternatives to the proposed project.

Other CEQA Considerations

The changes to the cut and fill quantities do not change the project's irreversible commitment to resources, irreversible environmental changes, or potential environmental damage from accidents from what was previously analyzed.

2.4 REVISIONS TO THE RECIRCULATED DRAFT EIR

This section contains the revised text of the recirculated draft EIR. Text added to the recirculated draft EIR is shown in <u>underline</u> format, and deleted text is shown in ~~strikethrough~~.

Due to the nature of the text changes that are presented below, the changes are cited individually rather than in a reproduction of the entire recirculated draft EIR. This presentation of revisions to the recirculated draft EIR is consistent with *State* CEQA *Guidelines* Section 15162 detailing required final EIR contents.

Section 1.0, Introduction, page 1.0-4

1.3.4 Individuals and Organizations

Adams Broadwell Joseph & Cardozo
<u>Jay Beard</u>
Jean-Pierre Bernard
<u>Lila Lynn Bilmes</u>
Mark Brennen
Deke and Corrin Brown
Cotton, Shires & Associates, Inc.
<u>Richard Cole</u>
Donald Coyne
James Goodman

Trudie Huygen
Jack Kundin
Russ Levikew
Pamela Merkadeau
Chris Misner
Suzette Murphy
Sam Naifeh
Pacific Gas & Electric
Regional Open Space
San Mateo Highlands Community Association
Les Schlaegel
Shute, Mihaly & Weinberger
Alex Stanculesan
Melissa Wilson
Mark and Gail Wuotila

Section 3.0, Project Description, page 3.0-23

3.5.1 Grading

Grading activities include cut (earth removal) and fill of earthwork; creation of engineered slopes and stepped foundations; installation of retaining walls, and drilled piers. These activities would prepare the lots for the building pads and provide slope stability for the foundation of future homes on the lots.

The average slope of the areas proposed for development is 40 percent. In total, there would be ~~3,700~~6,700 cubic yards (cy) of cut and ~~5,700~~7,600 cy of fill (including a 10 percent allowance for shrinkage, or settling, of dirt). The Project Applicant would use the cut earthwork material as fill on the project site. However, approximately ~~2,000~~700 additional cy of earth and about 200 cy of drain rock would need to be imported on-site for the project. Piers drilled into the underlying bedrock would be installed for each lot to provide slope stability for the future homes that would be built on each lot. A description of the grading plans for lots 1 through 11 and **Table 3.0-3, Proposed Earthwork,** showing a breakdown of total proposed cut and fill amounts for each lot, are provided below.

Table 3.0-3
Proposed Earthwork

Area	Cut (cy)	Fill (cy)
Lots 1–4	500	~~200~~2,300
Lots 5–8	~~1,000~~4,700	~~1,000~~700[1]
Lots 9 and 10	~~900~~300	2,900
Lot 11	~~1,300~~1,200	~~1,300~~1,000
TOTAL	***~~3,700~~6,700***	***~~5,900~~7,600***
Import	**~~2,200~~900**	

Source: BKF Engineers, ~~2008~~2009. Treadwell &Rollo, Inc, 2009.
[1]Includes 200 cubic yards of drain rock.

3.5.2 Lots 1 through 4

Lots 1 through 4, along Bunker Hill Drive, would require approximately 500 cy of cut and ~~200~~ 2,300 cy of fill earthwork (see **Figure 3.0-14**). A series of stepped cuts would be created to provide the platform necessary to build the homes. No fill slopes or site retaining walls would be needed for these lots because the dwelling units will be fully supported by drilled pier foundations with integrated day-lighting basement retaining walls.

3.5.3 Lots 5 through 8

Lots 5 through 8, along Ticonderoga Drive, would require ~~1,000~~4,700 cy of cut and ~~800~~ 500 cy of fill earthwork (see **Figure 3.0-15**). Any previously identified landslide deposits[1] would be removed from this portion of the site to provide stable slopes for construction. After removal of the landslide materials, the slope in Lots 7 and 8 would be rebuilt using a buttress fill landslide repair keyed and benched into the underlying bedrock. Spoils generated from the excavation will be used as fill, and will not require additional import or export of material other than a minor amount of drainrock for the subdrains associated with the repair. Upon implementation of the landslide mitigation, retaining walls, designed to withstand high lateral earth pressure from adjoining natural materials and/or backfill, as well as from any surcharge loads, would be installed in the rear of lots 5 through 8. These retaining walls would be partially underground. Retaining walls would also be installed in the front of lots 5 and 6 to aide in maintaining the slopes behind the house and the more extensive cut required for lots 5 and 6. These retaining walls would be partially underground. The design of the retaining walls has not been finalized

1 See Section **4.3, Geology and Soils** for more detailed information on landslide deposits on the project site.

at this time, but would most likely be a solid masonry wall. Cut slopes at a ratio of approximately 4:1 (horizontal to vertical) would be required for lots 5 and 6.

3.5.4 Lots 9 and 10

Lots 9 and 10, at the eastern end of Cobblehill Place, would require ~~900~~ 300 cy of cut and 2,900 cy of fill earthwork (see **Figure 3.0-16**). This site is relatively level, with the existing topography sloping slightly to the northeast. Minor cuts of up to 5 feet and fills of up to 8 feet would be made to create the building pads and the driveways and to remove and replace existing undocumented fill under buildings or flatwork. Retaining walls up to 8 feet in height would be used along the front of the property to retain the fill in the residence and driveway areas. Pier-supported, stepped foundations would support the dwelling units.

3.5.5 Lot 11

Lot 11, at the northeastern end of Cowpens Way, would require ~~1,300~~1,200 cy of cut and ~~1,300~~1,000 cy of fill earthwork (see **Figure 3.0-17**). This site has an existing slope of approximately 2:1 (horizontal to vertical). The site already contains fill that was placed during grading from the existing subdivision development in the surrounding area. Cuts of up to 10 feet below the existing grade would be made to create a stepped building pad and the driveway area and to remove and replace existing undocumented fill under buildings or flatwork. Retaining walls of up to 10 feet in height would be built through the middle of the house lengthwise, as part of the foundation, to retain the cuts for the proposed residence. Pier-supported stepped foundations would support the dwelling units.

3.5.6 Haul Trucks and Routes

The earth materials would be imported from nearby projects in the San Francisco Peninsula. The County does not have weight restrictions for roads, so the haul routes may differ slightly from what is presented below. To Ticonderoga Drive, the haul routes would likely be from Highway 92 to Polhemus Drive north. To Bunker Hill Drive, the haul routes would likely be from Highway 92 and then west to Skyline Boulevard. Given that a typical haul truck can carry approximately 12 cy of earth materials, approximately ~~183~~ 75 trips would be associated with the import of additional earth materials needed for the proposed project.

Section 4.1, Aesthetics, page 4.1-30

View from Polhemus Road – Facing Southwest

Polhemus Road, located ~~to the~~ northeast of the project site is considered a County Scenic Road, per the County General Plan. Visual Quality policies of the General Plan pertaining to scenic roads and corridors

apply only to the area of the roadway (right-of way) unlike a designated scenic corridor, where policies would apply to all properties within the area of the corridor. The project would not involve changes that would be visible from viewpoints along Polhemus Road nor would the project involve work within the Polhemus Road right-of-way. As shown in **Figure 4.1-13**, the proposed homes would not be visible from Polhemus Road near the intersection with Timberlane Way due to topography and intervening vegetation, nor would they be visible along Polhemus Road between Bunker Hill Drive and Tower Road for the same reasons. The rooflines of the proposed homes on ~~Ticonderoga Drive and~~ Cobblehill Place would be partially visible from Ralston Avenue (which becomes Polhemus Road north of Tower Road and is designated as a scenic road within the City of Belmont), but the homes would be adjacent to existing homes that are currently visible from this viewpoint. In summary, the project's impact to ~~this~~ the Polhemus Road and Ralston Avenue scenic roadways would be less than significant.

Section 4.2, Biological Resources, page 4.2-31

Impact BIO-6: **The implementation of the proposed project would result in the loss of stands of purple needlegrass, which is a sensitive plant community. (*Potentially Significant; Less than Significant with Mitigation*)**

As previously discussed, isolated areas with a high percent cover (greater than 50 percent) of purple needlegrass are present on portions of lots 1 and 8. The stand of purple needlegrass on lot 1 is small (approximately 10 feet by 10 feet) and is surrounded by non-native grass species. The stand of purple needlegrass on lot 8 is approximately 0.03 acre in size and is located in the ~~southeastern~~ southwestern portion of the site, between the oak woodland and areas invaded by iceplant. While pockets of native grasses (such as the small area on lot 1) often occur within non-native grasslands, the stand of purple needlegrass on lot 8 is notable as it is relatively large and has a high percent cover of needlegrass. However, the biological function and value of this stand of native grasses is compromised by the fact that the majority of lots 5–8 were disturbed by grading activities that occurred in the 1950s when the Highlands subdivision was built, that the stand of native grasses is generally bordered by disturbed habitats dominated by non-native plant species (excluding the nearby oak woodland), and that iceplant borders portions of the stand of native grasses and may be encroaching. Nonetheless, the loss of this stand of purple needlegrass would be considered a potentially significant impact. **Mitigation Measure BIO-6** would reduce this impact to a less-than-significant level.

Section 4.4, Other Resource Topics, page 4.4-31

- Generate noise levels in excess of levels determined appropriate according to the County Noise Ordinance standard.

Construction activities would result in short-term noise impacts that would affect the surrounding area. As discussed in **Section 3.0, Project Description** of the EIR, approximately ~~2,200~~900 cubic yards (cy) of earth materials would need to be imported to the project site. Approximately ~~183~~ 75 truck trips would be involved in the transport of this material. The haul routes would take large, heavy-duty dump trucks past residential uses, which are considered sensitive receptors. Trucks associated with grading activities occurring on Bunker Hill Drive would travel to the site on I-280 and enter the site from the west and trucks associated with grading activities along Ticonderoga Drive would travel to the site along Polhemus Road and enter the site from the east. It is anticipated that up to five truck trips to import fill could be completed daily. Therefore, the total site import process could be completed within a timeframe of ~~four to five~~three weeks, depending on the construction schedule, weather, and equipment availability. As a result, associated truck trips could generate short-term noise that would be considered a nuisance to the surrounding community or that may temporarily exceed County noise standards.

Section 4.4, Other Resource Topics, page 4.4-37

Project construction would occur over a period of one year. Construction vehicles would be expected to travel to and from the Ticonderoga Drive sites via Polhemus Road and Highway 92, whereas construction vehicles traveling to and from the Bunker Hill sites would use Highway 92 and Skyline Boulevard. Due to the hillside location of the project, preparation of the building sites would involve cut and fill. As discussed in **Subsection 3.5.1**, cut earthwork materials would be used on site as fill and would not have to be off-hauled. However, about ~~2,200~~900 cubic yard (cy) of fill materials would need to be imported. Given that a typical haul truck can carry approximately 12 cy of earth materials, approximately ~~183~~ 75 truck trips would be associated with the in-haul of fill and drain rock. It is anticipated that up to five truck trips to import fill could be completed daily and the total site import process could be completed within a timeframe of ~~four to five~~three weeks, depending on the construction schedule, weather, and equipment availability. This small number of daily truck trips would not adversely affect the operation of intersections between the worksites and the nearest freeways. Following completion of grading, additional truck movement would be involved with the delivery of construction materials to the project site. However, given the small number of homes proposed, the number of daily truck trips to the site during construction is expected to be small. The impact from construction truck traffic would therefore be less than significant. To further reduce this impact, the following improvement measure is proposed.

Section 4.4, Other Resource Topics, page 4.4-39

The District currently is working toward paying the fee to contribute to the upgrade of the sewer line. ~~Consequently,~~ County Planning staff will inform the Project Applicant that no new connections to the

District would be issued until all fees owed to ~~by~~ the City of San Mateo and the County General Fund ~~until the County fee is~~ are paid.

Section 4.4, Other Resource Topics, page 4.4-50

- Result in or increase traffic hazards or substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

As discussed above, the addition of the proposed project would not generate a substantial amount of motor vehicle trips in the project vicinity. Accordingly, the project would not result in a traffic hazard or an increase in traffic hazards. The project design would add driveways for the proposed homes. The driveways for the proposed homes along Ticonderoga Drive would be adjacent to curved sections of the existing roadway and steep grades. The sight distance from the easternmost property line on the north side of Ticonderoga Drive (lot 8) is approximately 230 feet. According to *A Policy on Geometric Design of Highways and Streets*[2], this is adequate for a design speed of 35 MPH. The posted speed limit on Ticonderoga Drive is 25 MPH. This is not an anticipated safety concern. However, implementation of **Mitigation Measure TRANS-2** would further reduce this impact to a less than significant level. ~~These design features are not expected to create traffic related hazards. Therefore, the impact is considered less than significant.~~

Mitigation Measure TRANS-2: The Project Applicant shall be required to pay for the installation of advisory traffic signs on Ticonderoga Drive in the vicinity of the proposed homes as determined necessary by the County of San Mateo Department of Public Works.

Section 4.4, Other Resource Topics, page 4.4-56

As discussed above, the project would require approximately ~~2,200~~900 cy of additional fill material that would be imported into the project site, and would potentially include small quantities of unusable fill that could require off-site disposal. The maximum amount of materials would be diverted in all project phases per San Mateo County's Construction and Demolition Ordinance No. 04099, which requires that 100 percent of inert solids (i.e., asphalt, brick, concrete, dirt, etc.) and 50 percent of all other construction and demolition debris be salvaged, reused, or recycled. The solid waste associated with construction would be a one-time disposal and would not significantly affect landfill capacity. Therefore, the project during construction and occupancy is not expected to generate significant amounts of solid waste and

[2] American Association of State Highway and Transportation Officials (AASHTO). 2004. *A Policy on Geometric Design of Highways and Streets*. Exhibit 3-1, page 112.

any associated waste would be sufficiently accommodated by the Ox Mountain landfill.[3] Given this, impacts are not considered significant.

3 Ox Mountain Landfill, 2008.