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LEAD AGENCY CITY OF SAN MATEO	LEAD AGENCY EMAIL	DATE 04/28/2026
COUNTY/STATE AGENCY OF FILING SAN MATEO COUNTY	DOCUMENT NUMBER 129494	
PROJECT TITLE		

2026 HIGH PRIORITY FLOOD RISK REDUCTION PROJECTS

PROJECT APPLICANT NAME CITY OF SAN MATEO	PROJECT APPLICANT EMAIL	PHONE NUMBER
PROJECT APPLICANT ADDRESS	CITY	STATE
		ZIP CODE

PROJECT APPLICANT (Check appropriate box)


- Local Public Agency
 School District
 Other Special District
 State Agency
 Private Entity

CHECK APPLICABLE FEES:

- Environmental Impact Report (EIR) \$ 4,227.50 \$ _____
- Mitigated/Negative Declaration (MND)(ND) \$ 3,043.75 \$ _____
- Certified Regulatory Program (CRP) document - payment due directly to CDFW \$ 1,437.25 \$ _____
- Exempt from fee
 - Notice of Exemption (attach)
 - CDFW No Effect Determination (attach)
- Fee previously paid (attach previously issued cash receipt copy)
- Water Right Application or Petition Fee (State Water Resources Control Board only) \$ 850.00 \$ _____
- County documentary handling fee \$ 50.00 \$ _____ 50.00
- Other \$ _____

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 TOTAL RECEIVED \$ _____ 50.00

SIGNATURE X 	AGENCY OF FILING PRINTED NAME AND TITLE Kamille Santos Deputy Clerk
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Notice of Exemption

Appendix E

To: Office of Planning and Research
 P.O. Box 3044, Room 113
 Sacramento, CA 95812-3044
 County Clerk
 County of: San Mateo
555 County Center 1st Floor
Redwood City, CA 94063

From: (Public Agency): City of San Mateo
1949 Pacific Boulevard
San Mateo, CA 94403

129494

(Address)

FILED
 SAN MATEO COUNTY
Apr 28 2026

MARK CHURCH, County Clerk

By

[Signature]
Deputy Clerk

Project Title: 2026 High Priority Flood Risk Reduction Projects

Project Applicant: City of San Mateo

Project Location - Specific:

16th Ave Channel and 19th Ave Channel, City of San Mateo. Refer to CE Memo.

Project Location - City: San Mateo Project Location - County: San Mateo

Description of Nature, Purpose and Beneficiaries of Project:

The project consists of vegetation removal within the existing 16th Avenue and 19th Avenue flood control channels to restore conveyance capacity and reduce flood risk. Work includes removal of herbaceous vegetation to the rooting depth, minor access improvements, and off-site disposal of materials. The purpose of the project is to maintain existing drainage infrastructure and reduce the risk of localized flooding. Beneficiaries include local residents and businesses. Additional project details are provided in the attached Categorical Exemption (CE) Memorandum (Memo).

Name of Public Agency Approving Project: City of San Mateo

Name of Person or Agency Carrying Out Project: City of San Mateo

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: CEQA Guidelines Section 15301 (Class 1) – Existing Facilities
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

The project qualifies for a Class 1 Categorical Exemption under CEQA Guidelines Section 15301 because it consists of routine maintenance of existing flood control facilities involving negligible or no expansion of use. Project activities include vegetation removal within existing channels to restore conveyance capacity and will occur within previously disturbed areas. As demonstrated in the attached CE Memo, the project would not result in any significant environmental effects, and none of the exceptions to the use of categorical exemptions identified in CEQA Guidelines Section 15300.2 apply.

Lead Agency
 Contact Person: Gustavo E. Lopez Area Code/Telephone/Extension: 650-522-7342

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: *[Signature]* Date: 4/28/2026 Title: Environmental Programs Coordinator

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
 Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

Memorandum

April 13, 2026

Subject: 2026 High Priority Flood Risk Reduction Projects – CEQA Recommendation

To: Sven Edlund, City of San Mateo
Gustavo Lopez, City of San Mateo

From: Kathlyn Osagie, Montrose Environmental
Bridget Lillis, Montrose Environmental
Ken Schwarz, Montrose Environmental

Purpose

The City of San Mateo (City) will serve as the California Environmental Quality Act (CEQA) lead agency for the 2026 High Priority Flood Risk Reduction Projects (proposed project or Project). Montrose Environmental (Montrose) has been retained by the City to evaluate potential environmental effects of the Project and provide a CEQA compliance recommendation. The memorandum which follows first describes the Proposed Project and then evaluates the potential applicability of a Categorical Exemption to comply with CEQA. The key conclusion of this memorandum is that the Class 1 Categorical Exemption does apply and can be used as an appropriate CEQA pathway.

Proposed Project Description

The City maintains creeks, channels, basins, and associated drainage facilities to ensure the safe conveyance of runoff and storm flows throughout its watersheds and storm drain system. The City has identified two high-priority locations within the 16th Avenue and 19th Avenue Channels that require maintenance to restore conveyance capacity. Vegetation overgrowth in both channels has reduced their ability to convey stormwater during high-flow events.

The 16th Avenue Channel has experienced substantial cattail (*Typha* spp.) establishment. Cattails commonly colonize low-gradient channels where slow-moving water allows sediment to accumulate. As stands become denser, they trap additional sediment, further raising the channel bed, reducing channel capacity and slowing flow velocities. The current vegetation growth condition at these two channels has impacted proper culvert and drainage functioning and has increased the risk of localized flooding and property damage.

The 19th Avenue Channel is a concrete-lined flood control channel that has experienced localized flooding and adjacent property damage, most recently during storm events in January 2023. Vegetation overgrowth including cattails, brass buttons (*Cotula coronopifolia*), and bitter dock (*Rumex obtusifolius*) has reduced the channel's conveyance capacity. To avoid and minimize potential environmental effects while prioritizing the highest maintenance needs, the City has identified four priority segments along the 19th Avenue Channel with the greatest need for vegetation management.

The Project would consist of routine vegetation maintenance activities at the 16th and 19th avenue channels and would not result in expansion of capacity or change in channel use. All work would occur within previously disturbed areas.

Project Locations

The Project is located in the City of San Mateo, San Mateo County, California.

The 16th Avenue Channel site is between South Railroad Avenue and South Delaware Street, running parallel to East 16th Avenue (Figure 1). Adjacent land uses near the 16th Avenue Channel site include residential development to the north and transportation-related uses to the south, including a maintenance access road and parking areas associated with nearby rail and commercial activities.

The 19th Avenue Channel site is located along Pacific Boulevard and intersects with 19th Avenue (Figure 2). The 19th Avenue Channel is bordered to the west by Caltrain railroad tracks, and to the east by a fence. Pacific Boulevard and the City's Corporation Yard are located further east of the channel. The proposed channel work would occur within the Caltrain right-of-way.

Work Activities at the 16th Avenue Channel Site

The Project would remove approximately 3,800 square feet (sqft) of cattails along approximately 585 linear feet (LF) of the 16th Avenue Channel. Additionally, invasive and nonnative vegetation would be removed from the channel's right bank (looking downstream). Vegetation removal would be conducted using a long-arm excavator operating from outside the channel at the top of the channel streambank, allowing work to occur without equipment entering the channel. Cattails would be removed to the rooting depth to restore channel capacity. Removed vegetation materials would be placed directly into dump trucks for immediate off haul from the site. All excavated plant material would be disposed of offsite at an appropriate green waste disposal facility.

Site preparation would include trimming and mowing vegetation along the existing maintenance road above the top of the bank to facilitate site access.

Construction vehicles and equipment would access the project site from South Delaware Street and would use the existing maintenance road at the top of the bank for staging. The maintenance road is located outside of the channel. Construction equipment is expected to include an excavator, haul trucks, and handheld or powered tools (e.g. weed trimmers, mowers).

Project construction would occur between August and September 2026, during the low flow period. Construction is expected to involve a crew of approximately 3–5 workers, including equipment operators and support personnel. Work would take approximately five days to complete.

No trees would be removed. No dewatering is planned. No decant water discharge or material storage would occur within the channel or adjacent work areas. No pesticides would be applied following vegetation removal.

Work Activities at the 19th Avenue Channel Site

The Project would also remove approximately 2,602 sqft of herbaceous vegetation along 247 LF of the 19th Avenue Channel, at four specific high-priority locations¹. Vegetation removal would be conducted using a small bobcat operating within the channel, which would access the channel through existing maintenance gates. Vegetation would be removed to the rooting depth. Material would be collected by a short-boom excavator positioned at the access gate, transferring material to dump trucks and transported off-site. Materials would be immediately hauled offsite at an appropriate green waste disposal facility.

Access would be limited to three (3) access gates within the Caltrain fence. Staging would be outside of the channel, along Pacific Boulevard. Construction equipment is expected to include a bobcat, short-boom excavator, haul trucks, and handheld tools. Construction would involve a crew of approximately 3–5 workers, including equipment operators and support personnel.

The Project would occur during the low flow period. In most years, the channel is dry during the late summer months. However, if water is present during construction, temporary dewatering may be required to isolate the work area. Dewatering may be conducted using a combination of temporary measures, such as temporary use of sand bags and flow diversion around the work areas. Dewatering activities would be limited in duration and extent and implemented only for the time necessary to complete construction. The proposed work is scheduled to take only one day to complete.

No trees would be removed, and no pesticides would be applied following vegetation removal.

Best Management Practices

Best Management Practices (BMPs) would be implemented as part of the Project to avoid or minimize potential environmental effects (see Table 1).

¹ The four high-priority locations are depicted collectively within the single polygon labeled “Priority Segment Area” in Figure 2.

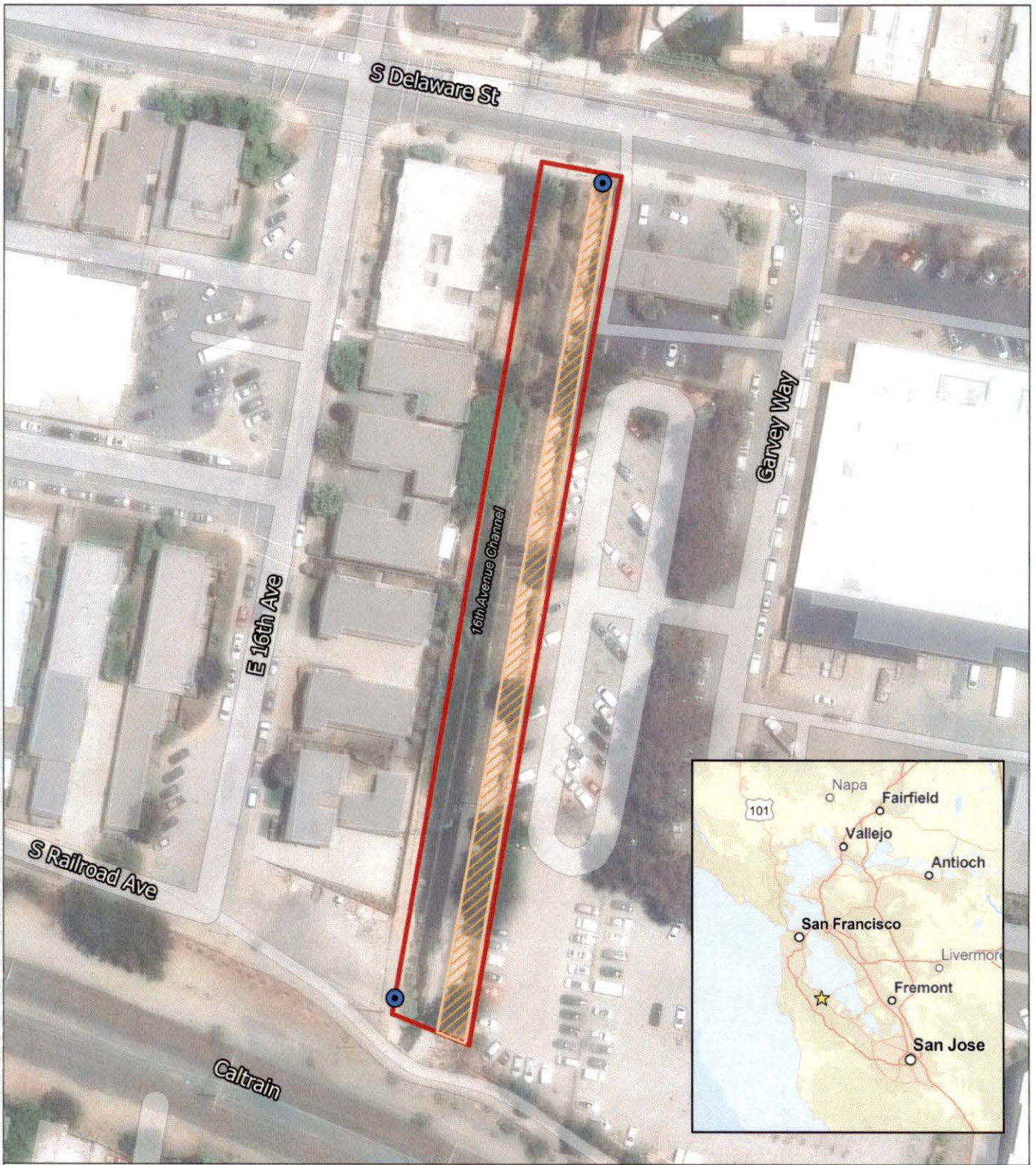
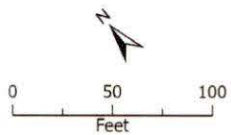


Figure 1
16th Ave Project Location



- Project Boundary
- Staging and Access
- Access Point
- ★ Project Location

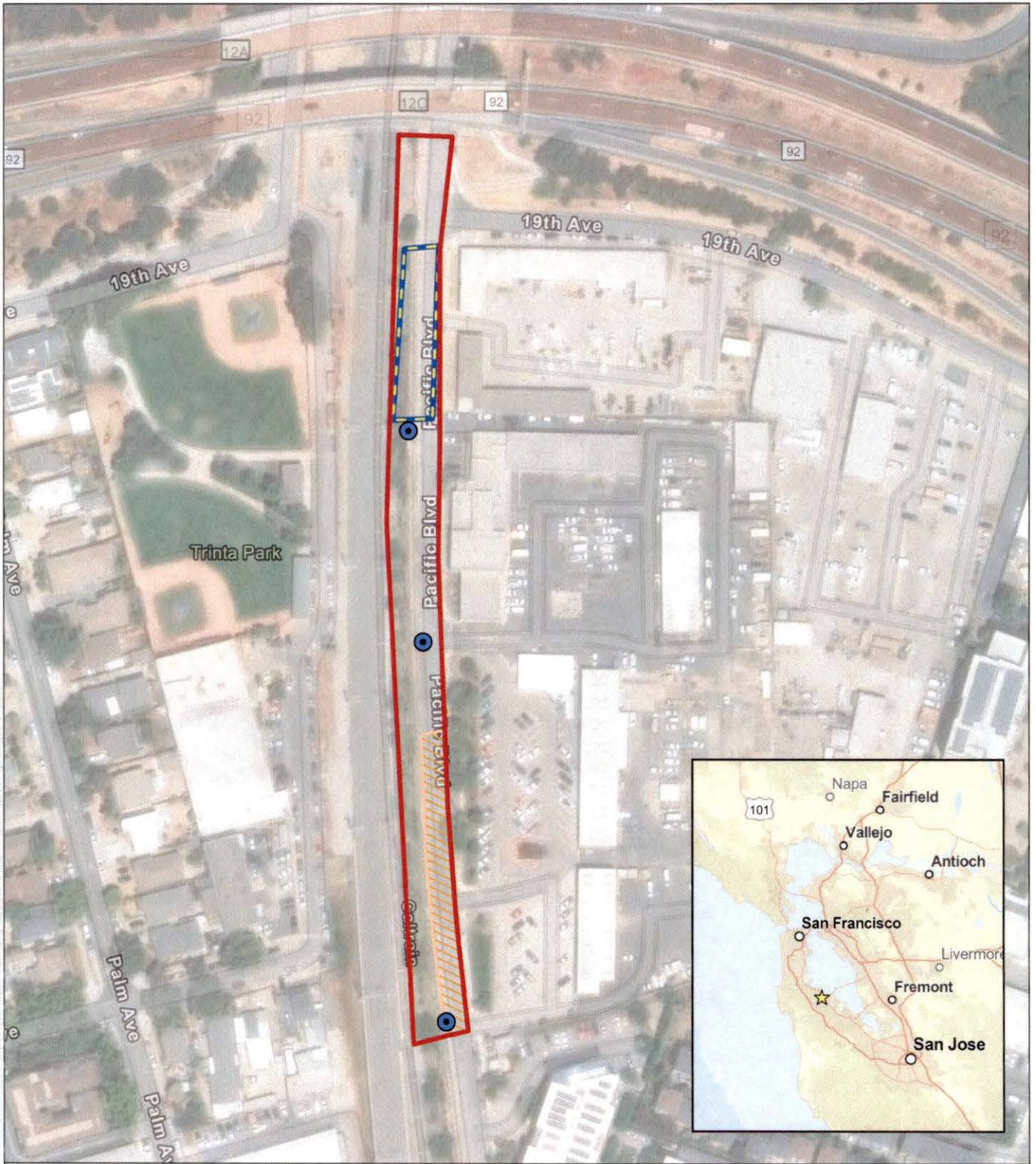
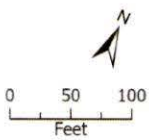


Figure 2

19th Ave Project Location

Source: Montrose Hybrid Reference Layer, Esri, DeLorme, Garmin, FAO, NOAA, USGS, OpenStreetMap contributors, and Mapbox (see comments).
 Mount, Geographic Data Science, Esri, DeLorme, Garmin, FAO, NOAA, USGS, OpenStreetMap contributors, and the USGS National Geographic
 Digital Elevation Model
 World Street Map Sources: Esri, DeLorme, Garmin, FAO, NOAA, USGS, OpenStreetMap contributors, and the USGS National Geographic



- Project Boundary
- Priority Segment Area
- Staging and Access
- Access Point

CEQA Compliance Approach

Class 1 Categorical Exemption (Guidelines §15301 – Existing Facilities)

Sections 15300 through 15332 of the State CEQA Guidelines identify classes of projects that have been determined not to result in significant environmental effects and are therefore potentially exempt from CEQA requirements for additional analysis and documentation. The proposed project meets the criteria for a Class 1 Categorical Exemption pursuant to CEQA Guidelines Section 15301. A project qualifies for a Class 1 Categorical Exemption if it involves the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features and results in negligible or no expansion of existing or former use. The Project would consist of routine maintenance of an existing flood control channel, including removal of vegetation overgrowth and excess sediment to restore conveyance capacity. The use of the sites would remain unchanged following completion of the Project, and the Project would not increase channel capacity beyond existing as-built conditions. Accordingly, the Project would qualify for a Class 1 Categorical Exemption.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions.

CEQA requires evaluation of whether the proposed project is subject to any of the six exceptions to the Categorical Exemptions identified in Section 15300.2 of the CEQA Guidelines that would preclude the use of a categorical exemption.

The six exceptions include: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources. The proposed project qualifies for a Class 1 Categorical Exemption under CEQA Guidelines Section 15301 (Existing Facilities), and none of the exceptions identified in Section 15300.2 apply. The potential applicability of each exception is reviewed below to support the conclusion that these exceptions to the use of a Categorical Exemption do not apply.

(a) Location. *A categorical exemption cannot be used if the project may impact an environmentally sensitive area.*

Both the 16th and 19th Avenue Channel sites occur within previously disturbed areas with limited potential to support sensitive environmental resources. Given the high level of disturbance and surrounding development, special-status species would not be expected to occur at the 19th Avenue Channel site. There is low potential for special-status species such as the western bumble bee (*Bombus occidentalis*) to occur at the 16th Avenue Channel site. The 16th Avenue Channel site also has low potential for roosting hoary bat (*Lasiurus cinereus*). The Project is not expected to adversely affect these species. The work area consists of previously disturbed habitat within a partially earthen and partially concrete-lined flood control channel that is not expected to provide suitable nesting or roosting habitat. Dense cattail stands within the channel offer limited floral resources and are generally unsuitable for western bumble bee nesting due to periodic inundation and routine maintenance disturbance. Project

activities would be temporary and localized and would not substantially reduce available foraging habitat in the surrounding area. Vegetation is expected to naturally reestablish following completion of the work. Hoary bats primarily roost in tree foliage, and no mature trees or suitable roosting habitat would be removed as part of the Project. Although the Project would not remove trees, several mature trees located along the 16th and 19th Avenue sites may support nesting birds. With the implementation of BMP 9 (*Nesting Migratory Bird Protection*), the Project is not anticipated to adversely affect nesting birds.

The Project is not anticipated to impact special-status species, migratory nesting birds, or wetlands. Following Project completion, the channel would continue to function as a movement and foraging corridor; therefore, the Project would not impact environmentally sensitive areas.

(b) Cumulative Impacts. *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The Project would involve minor vegetation and sediment removal. Project activities would occur over a short duration, lasting approximately one day at the 19th Avenue Channel site and five days at the 16th Avenue Channel site. As discussed below, the proposed project would not result in significant environmental impacts. Given its small scale, limited intensity, and short duration, the Project would not make a cumulatively considerable contribution to cumulative impacts. Therefore, the proposed project would not result in significant cumulative impacts.

(c) Significant Effect. *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

To establish that this exception applies, a party must demonstrate that the proposed project presents unusual circumstances and that there is a reasonable possibility of a significant environmental effect due to those unusual circumstances (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1098). California courts consider the conditions in the immediate vicinity of a proposed project in determining whether unusual circumstances are present. Although the Project is located near sensitive receptors, the surrounding conditions are not unusual. The project site consists of an existing flood control channel within a developed area, and maintenance activities associated with flood control facilities are typical of the project vicinity and do not constitute unusual circumstances.

Construction-related noise would be temporary and limited in duration. No unusual circumstances exist that would result in a significant noise impact to nearby sensitive receptors; therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply.

Construction-related air emissions would be temporary and limited in duration (approximately six days). Equipment used for vegetation and sediment removal would meet applicable Tier 4 engine standards, which substantially reduce diesel particulate matter emissions. Although work would occur near

residential areas, emissions would be short-term and localized and would not exceed applicable air quality thresholds or result in substantial exposure of sensitive receptors to diesel particulate matter. Therefore, the Project would not result in a significant air quality impact, and the exception under CEQA Guidelines Section 15300.2(c) would not apply.

Construction would occur during the dry season to minimize impacts on water resources. If flowing water is present, it would be diverted around the work areas. In addition, the Project would incorporate BMP 6 (*Spill Prevention*) and BMP 7 (*Erosion Control*) to protect water quality. Therefore, the Project would not result in a significant water quality impact, and the exception under CEQA Guidelines Section 15300.2(c) would not apply.

Because no unusual circumstances are present, there is no reasonable possibility of a significant effect on the environment due to unusual circumstances; therefore, the exception does not apply.

(d) Scenic Highways. *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as state scenic highway.*

The nearest highway officially designated as a State Scenic Highway by the California Department of Transportation is Interstate 280, located approximately 3.19 miles west of the Project sites. Therefore, the proposed project would not result in damage to scenic resources, including trees, historic buildings, rock outcroppings, or similar features, within a designated State Scenic Highway corridor, and this exception does not apply.

(e) Hazardous Waste. *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

According to EnviroStor, the State of California's database of Hazardous Waste Sites, neither the subject properties nor any property in the vicinity of the Project sites has been identified as a hazardous waste site. Therefore, this exception does not apply.

(f) Historic Resources. *A categorical exemption shall not be used for a project which may cause substantial adverse change in the significance of a historical resource.*

Adverse effects to cultural resources are not anticipated at either site because all work would occur mainly within an existing concrete-lined channel (except for a portion of the 16th Avenue channel bottom, which is earthen) and within previously disturbed areas that are unlikely to contain intact archaeological or historical resources. Therefore, the proposed project would not have an impact on a historical resource, and this exception does not apply.

Conclusion and CEQA Recommendation

Based on the analysis presented above, the Project would qualify for a Class 1 Categorical Exemption

pursuant to CEQA Guidelines Section 15301 (Existing Facilities), as it involves routine maintenance of existing public facilities with negligible or no expansion of use. None of the exceptions to the use of categorical exemptions identified in CEQA Guidelines Section 15300.2 would apply. Accordingly, no further environmental review would be required under CEQA.

Table 1. BMPs Applicable to the Project

SECTION A—MATERIALS AND WASTE MANAGEMENT

BMP Number	BMP Title	BMP Description
1	Non-Hazardous Materials	<ul style="list-style-type: none"> • Berm and cover stockpiles of sand, soil, or construction materials with tarps when rain is forecast or when not in use for extended periods. • Use (but don't overuse) reclaimed water for dust control.
2	Hazardous Materials	<ul style="list-style-type: none"> • Label all hazardous materials and hazardous wastes (such as pesticides, paints, thinners, solvents, fuel, oil, and antifreeze) in accordance with city, county, state and federal regulations. • Store hazardous materials and wastes in watertight containers, store in appropriate secondary containment, and cover them at the end of every workday or during wet weather or when rain is forecast. • Follow manufacturers' application instructions for hazardous materials and be careful not to use more than necessary. Do not apply chemicals outdoors when rain is forecast within 24 hours. • Arrange for appropriate disposal of all hazardous wastes.
3	Waste Management	<ul style="list-style-type: none"> • Cover waste disposal containers securely with tarps at the end of every workday and during wet weather. • Check waste disposal containers frequently for leaks and to make sure they are not overfilled. Never hose down a dumpster on the construction site. • Clean or replace portable toilets and inspect them frequently for leaks and spills. • Dispose of all waste and debris properly. Recycle materials and wastes that can be recycled (such as asphalt, concrete, aggregate base materials, wood, gyp board, pipe, etc.) • Dispose of liquid residues from paints, thinners, solvents, glues, and cleaning fluids as hazardous waste.

BMP Number	BMP Title	BMP Description
4	Construction Entrances and Perimeter	<ul style="list-style-type: none"> • Establish and maintain effective perimeter controls and stabilize all construction entrances and exists to sufficiently control erosion and sediment discharges from site and tracking off site. • Sweep or vacuum any street tracking immediately and secure sediment source to prevent further tracking. Never hose down streets to clean up tracking.

SECTION B—EQUIPMENT MANAGEMENT AND SPILL CONTROL

BMP Number	BMP Title	BMP Description
5	Maintenance and Parking	<ul style="list-style-type: none"> • Designate an area, fitted with appropriate BMPs, for vehicle and equipment parking and storage. • Perform major maintenance, repair jobs, and vehicle and equipment washing off site. • If refueling or vehicle maintenance must be done onsite, work in a bermed area away from storm drains and over a drip pan or drop cloths big enough to collect fluids. Recycle or dispose of fluids as hazardous waste. • If vehicle or equipment cleaning must be done onsite, clean with water only in a bermed area that will not allow rinse water to run into gutters, streets, storm drains, or surface waters. • Do not clean vehicles or equipment onsite using soaps, solvents, degreasers, or steam cleaning equipment.
6	Spill Prevention and Control	<ul style="list-style-type: none"> • Keep spill cleanup materials (e.g., rags, absorbents and cat litter) available at the construction site at all times. • Inspect vehicles and equipment frequently for and repair leaks promptly. Use drip pans to catch leaks until repairs are made. • Clean up spills or leaks immediately and dispose of cleanup materials properly. • Do not hose down surfaces where fluids have spilled. Use dry cleanup methods (absorbent materials, cat litter, and/or rags).

BMP Number	BMP Title	BMP Description
		<ul style="list-style-type: none"> • Sweep up spilled dry materials immediately. Do not try to wash them away with water or bury them. • Clean up spills on dirt areas by digging up and properly disposing of contaminated soil. • Report significant spills immediately. You are required by law to report all significant releases of hazardous materials, including oil. To report a spill: 1) Dial 911 or your local emergency response number, 2) Call the Governor’s Office of Emergency Services Warning Center, (800) 852-7550 (24 hours).

SECTION C—EARTHMOVING

BMP Number	BMP Title	BMP Description
7	Erosion Control	<ul style="list-style-type: none"> • Schedule grading and excavation work during dry weather. • Stabilize all denuded areas, install and maintain temporary erosion controls (such as erosion control fabric or bonded fiber matrix) until vegetation is established. • Remove existing vegetation only when absolutely necessary, and seed or plant vegetation for erosion control on slopes or where construction is not immediately planned. • Prevent sediment from migrating offsite and protect storm drain inlets, gutters, ditches, and drainage courses by installing and maintaining appropriate BMPs, such as fiber rolls, silt fences, sediment basins, gravel bags, berms, etc. • Keep excavated soil on site and transfer it to dump trucks on site, not in the streets.
8	Contaminated Soil	If any of the following conditions are observed, test for contamination and contact the Regional Water Quality Control Board:

BMP Number	BMP Title	BMP Description
		<ul style="list-style-type: none"> • Unusual soil conditions, discoloration, or odor. • Abandoned underground tanks. • Abandoned wells • Buried barrels, debris, or trash.

Source: SMCWPPP, 2014

SECTION D— BIOLOGICAL RESOURCES

BMP Number	BMP Title	BMP Description
9	Nesting Migratory Bird Protection	<p>To the extent possible, conduct vegetation removal activities prior to nesting bird season (February 1 through August 31).</p> <p>If work must occur during the nesting season (February 1 through August 31), a qualified biologist shall conduct a pre-construction nesting bird survey within 7 days prior to the start of vegetation removal or ground-disturbing activities. The survey shall cover the project area and a suitable buffer (typically 100 feet for passerines and up to 300 feet for raptors, as appropriate based on site conditions).</p> <p>If an active nest is identified, a temporary no-disturbance buffer shall be established around the nest. Buffer distances shall be determined by the qualified biologist based on species, nest location, and level of disturbance, and may range from 50 to 300 feet or greater for raptors. No work shall occur within the buffer until the qualified biologist determines that the nest is no longer active.</p> <p>If work occurs near an established buffer, the qualified biologist may conduct periodic monitoring to ensure that nesting activity is not adversely affected. Work within the buffer area may resume once the qualified biologist confirms that the nest has failed or that young have fledged and are no longer reliant on the nest.</p>

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(650) 363-4500

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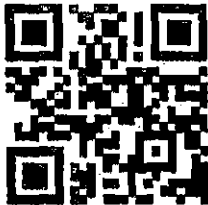
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