

# MEMORANDUM

**To:** Anwar Mirza, Project Manager, – City of East Palo Alto Public Works Department  
**From:** Kate Elliott, Project Director– Harris & Associates  
**RE:** City of East Palo Alto O’Connor Pump Station Phase I – Supporting Memorandum for Categorical Exemption (Class 2 Replacement or Reconstruction)  
**Date:** May 1, 2026  
**Att:** 1, Figures; 2, Hazardous Waste Site Database Searches

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The City of East Palo Alto (City) is the lead agency for the O’Connor Pump Station Phase I Project (project).

This memo provides supporting documentation for the City’s determination that the project is exempt from the California Environmental Quality Act (CEQA), in accordance with CEQA Guidelines Section 15301 Class 1, Existing Facilities, and Section 15302 Class 2, Replacement or Reconstruction of existing structures or facilities. **Attachment 1** includes all figure references.

## Project Location

The existing O’Connor Pump Station is situated at the end of O’Connor Street in the northwestern sector of East Palo Alto, in San Mateo County, California. The Project site is located between San Francisco Bay Trail and O’Connor Street (Figure 1, Project Location). Surrounding areas include residential neighborhoods that rely on the station to reduce stormwater build-up during heavy precipitation, as well as San Francisquito Creek and the San Francisco Baylands to the east.

## Project Description

East Palo Alto has historically experienced flooding from heavy rainfall events and creek overflows. The O’Connor Pump Station (Pump Station) lies in a flood-prone area adjacent to San Francisquito Creek, protecting residential neighborhoods from storm-related inundation. The purpose of the Pump Station is to collect the stormwater and discharge it into San Francisquito Creek. The Pump Station, constructed decades ago, cannot consistently handle peak stormwater flows. It currently has insufficient capacity for the projected 10-year and 100-year stormwater runoff. In addition, the existing infrastructure, including diesel-driven pumps and hazardous-class electrical equipment, no longer meet modern code standards. Reliability shortfalls increase the risk of local flooding events, impacting public safety, property, and the surrounding environment.

The Project will perform electrical system upgrades to the existing Pump Station. As part of the upgrade, the project will remove and replace single-walled fuel lines, upsize the low flow pump with a new 100 horsepower (HP) electric motor-driven pump, install a new 400 HP electric motor driven pump, and upgrade ventilation systems. The upgrades will modernize and increase the reliability of the O’Connor Pump Station to better manage flood risks in East Palo Alto’s low-lying neighborhoods.

Specifically, the project would remove the existing 40 horse power (HP) pump and replace it with a new 100HP electric motor. The new motor will partially increase the capacity of the Pump Station from 200 cubic feet per second to 222 cubic feet per second. The existing 225 HP diesel driven motors and pumps will be removed and

replaced with new 400 HP electric motor driven pumps. New fan and ventilation system will be installed, which includes upsizing existing louvres on the wet well wall and installing a new warning alarm system. The project also includes an upgrade to the PG&E service to handle increased electrical demand. PG&E will install a new transformer and electric service, along with new control panels and a motor control panel. The new pump and motor will be tied to the updated electrical system.

## Schedule

Project construction is planned to occur in summer of 2027 and will take approximately 180 days to complete. Construction will occur during daylight hours, generally between 7:00 am and 7:00 pm, Monday through Saturday.

## Access

Primary access will occur from existing developed areas. Equipment staging, material storage, and fueling will occur only within contained upland areas located away from San Francisquito Creek. No clearing or grubbing, including removal of native vegetation, is required to facilitate project implementation. Work will be confined to the existing Pump Station.

## Avoidance and Minimization Measures

Construction will be conducted in a manner that avoids and minimizes the potential for discharge of sediment, debris, or other pollutants to waters of the State. To avoid and minimize impacts to waters of the United States and/or State waters, the following best management practices will be implemented:

- Work will be limited to the 'dry season', between April and October for reduced risk of rainfall.
- No work will occur during forecast or active precipitation events.
- Spill containment and cleanup materials will be maintained onsite to address any potential release that could affect waters of the United States and/or State waters.
- Fueling, lubrication, maintenance, storage, and staging of vehicles and equipment will be conducted outside of waters of the United States and/or State waters and managed to prevent any discharge.
- In the event that construction-related materials enter surface waters, spill response procedures will be implemented immediately, and State Water Board staff will be notified within 24 hours.
- All construction materials, equipment, and debris will be removed from the work area upon completion of the Project.
- Erosion control measures, including silt fencing and straw wattles, will be implemented to prevent sediment or runoff from leaving the work.

Although the likelihood of encountering sensitive species is extremely low, the City will implement the following additional avoidance and minimization measures to further reduce any potential effects to nesting birds:

- **BIO-1: Nesting Bird Protection.** If construction cannot feasibly occur outside the general bird breeding season (January 15 through August 31), a qualified biologist will perform a pre-construction nesting bird survey no more than 72 hours prior to the start of construction to determine if active bird nests are present in the affected areas. Should an active bird nest be located, the qualified biologist will establish a buffer and direct vegetation clearing away from the nest until it has been determined that the young have fledged or the nest has failed. If no nesting birds (including nest building or other breeding or nesting behavior) are in the construction area, grubbing, trimming, or clearing will proceed.

## Qualifications for a Categorical Exemption

The CEQA Guidelines Section 15300 includes a list of classes of projects that have been determined not to have a significant effect on the environment and thus are exempt from the provisions of CEQA, if the specified exceptions to using the exemption do not apply. Implementation of the project, as described above, falls within both Class 1, Existing Facilities, and Class 2, Replacement or Reconstruction.

Per CEQA Guidelines Section 15301, Class 1 consists of the operation, repair, maintenance, permitting, or minor alteration of existing public or private structures, facilities, and mechanical equipment involving negligible or no expansion of existing or former use. The types of facilities include, but are not limited to:

- a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;
- b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewage, or other public utility services; and
- d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety.

Per CEQA Guidelines Section 15302, Class 2 consists of replacement or reconstruction of existing structures or facilities on the same site having substantially the same purpose and capacity, including but not limited to:

- c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

As stated above, the project involves electrical system and ventilation upgrades, replacing fuel lines, and increasing the pumping horsepower to meet modern code standards and reduce the risk of local flooding events for public health and safety. The new electrical pumps will increase the capacity of the Pump Station from 200 cubic feet per second to 222 cubic feet per second, which is considered negligible in this context. Therefore, both the Class 1 and Class 2 exemptions are applicable.

## Exceptions to Using a Categorical Exemption

CEQA Guidelines Section 15300.2, Exceptions, identifies the following exceptions to using a Categorical Exemption. Based on an examination of the project and supporting information, the project would not result in any impacts to the environment that would cause an exception to applying the Class 1 or Class 2 Categorical Exemptions to the project, as described below.

- (a) Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.

Exception (a) does not apply because the project falls within Class 1 and Class 2.

- (b) Cumulative Impact.** 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.

Exception (b) does not apply. The project will not result in significant environmental impacts. Due to the temporary and short-term nature of project construction, the potential for cumulative impacts to occur is low. Furthermore, there are no major reasonably foreseeable future projects within the geographic scope that would result in significant cumulative impacts in combination with the Project. Therefore, no significant cumulative impacts will result from successive projects in the same place over time.

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

Exception (c) does not apply. The project activities are within the disturbed pump station and access road from O'Connor Street. Although the pump station site is located adjacent to the San Francisquito Creek near freshwater emergent wetlands, no impacts to wetlands are expected, as all construction will take place outside of the wetlands and within an already developed area.

Eleven federally listed species and two proposed threatened species have the potential to occur in the vicinity of the project site, and no critical habitat is present within the project site<sup>1</sup>. However, the project will occur entirely within previously disturbed areas. Therefore, the project will have no effect on federally listed species and is not likely to jeopardize the continued existence of species proposed for listing.

With implementation of best management practices identified in the project description above, the project will not result in a significant discharge of pollutants, degrade water quality, or adversely affect aquatic habitat. Finally, project implementation will result in an overall long-term benefit to communities by increasing the overall capacity of the Pump Station to meet current demands and shifting away from diesel-driven motors which reduces greenhouse gas emissions, improves local air quality, and aligns with regional goals. There are no unusual circumstances that will result in a significant environmental impact.

**(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 a state scenic highway.

Exception (d) does not apply. Interstate 280 is an officially designated state scenic highway by the California Department of Transportation and is located approximately 5.1 miles to the west of the project site (Caltrans 2024). The project site is not visible from Interstate 280, and the pump station upgrades will not obstruct or degrade scenic views, trees, or other visual resources associated with Interstate 280. The Pump Station upgrades will be visually consistent with the existing pump station. Therefore, the project will not damage scenic resources within a highway officially designated as a state scenic highway.

**(e) Hazardous Waste Sites.** 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.

Exception (e) does not apply because the project site is not on any list compiled pursuant to California Government Code, Section 65962.5. A database search was conducted in April of 2026 of the California State Water Resources Control Board's GeoTracker database and the California Department of Toxic Substances Control's EnviroStor database, and there are no active hazardous waste sites within 1,000 feet of the project area (**Attachment 2**).

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

Exception (f) does not apply. In April 2025, Environmental Research Group, LLC (ERG) completed an archival records search, a historical map review, an ethnographic literature review, and conducted a desk top inventory of the project site. No historical resources were identified within the project site. Therefore, project implementation would not result in a substantial adverse change in the significance of a historical resource.

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<sup>1</sup> This is based on the USFWS Unofficial Species List (dated March 27, 2025) that was included as part of the NEPA Categorical Exclusion prepared for the project.

The project constitutes a single and complete project. For the reasons stated previously, the project is categorically exempt from CEQA in accordance with CEQA Guidelines Section 15301, Existing Facilities (Class 1) and Section 15302, Replacement or Reconstruction (Class 2).

## References

California Department of Transportation (Caltrans). 2024. California State Scenic Highway System Map. Accessed April 2026. Accessed at <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

Department of Toxic Substance Control (DTSC). 2024. Envirostor Database Search. Accessed April 2026.

State Water Resources Control board. 2024. Geotracker Database Search. Accessed April 2026.

**Attachment 1, Figures**

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Figure 1. Project location on USGS topographic quadrangle.



Figure 2. Project location on aerial imagery.

**Attachment 2, Hazardous Waste Sites Database Searches**

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**LEGEND** - CHOOSE MORE SITES

- Federal Superfund - REMOVE
- State Response - REMOVE
- Voluntary Cleanup - REMOVE
- School Cleanup - REMOVE
- Evaluation - REMOVE
- School Investigation - REMOVE
- Military Evaluation - REMOVE
- Tiered Permit - REMOVE
- Corrective Action - REMOVE
- Historical - REMOVE
- Field Points - REMOVE
- Operating - REMOVE
- Post-Closure - REMOVE
- Non-Operating - REMOVE

Signifies a Closed Site



LIST SITES VISIBLE ON MAP



**LEGEND - CHOOSE MORE SITES** ✕

- LUST Cleanup Sites - [REMOVE](#)
- Cleanup Program Sites - [REMOVE](#)
- Military Cleanup Sites - [REMOVE](#)
- Military Privatized Sites - [REMOVE](#)
- Military UST Sites - [REMOVE](#)
- Military UST Privatized Sites - [REMOVE](#)

Signifies a Closed Site

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**ACTIVE MAP COVERAGES:**

- Military Bases - [REMOVE](#)

LIST SITES VISIBLE ON MAP