

**Evaluation for Applicability of a Categorical Exemption Under CEQA Section 15319  
Annexation of Existing Facilities and Lots for Exempt Facilities, and Section 15303 New  
Construction or Conversion of Small Structures**

**244 Club Drive Lot Annexation into City of San Carlos  
San Carlos, California**

**Introduction**

The City of San Carlos (City) has received an application (PLN 2023-00099) to annex a 0.22-acre (9,754 square foot) parcel developed with a single-family residence from unincorporated San Mateo County (County) into the City of San Carlos. The proposed project includes abandoning the existing septic system on the parcel, installing a new City-required pump station within the parcel, and connecting the new pump station to the City of San Carlos's sanitary sewer system. The project site is located at 244 Club Drive (APN 049-050-070) in the San Carlos hills, in the Devonshire area of unincorporated San Mateo County. Single-family homes are to the east and west side of the property and to the south across Club Drive. The project area is mainly surrounded by open space with hiking trails. The nearest major cross streets to the project site are Crestview Drive, approximately 0.58 mile west, and Beverly Drive, approximately 0.29 mile east (See Figure 1).

The annexation is considered a project under the California Environmental Quality Act (CEQA) and the City, acting as the Lead Agency under CEQA, must prepare an appropriate environmental evaluation of the potential project impacts as required by CEQA. The CEQA Guidelines include a list of classes of projects which have been determined not to have a significant effect on the environment and which are considered exempt from the provisions of CEQA. The Article 19 Categorical Exemptions of the CEQA Guidelines presents this list of classes of projects determined not to have a significant effect on the environment, and thus are declared to be categorically exempt from the requirement for the preparation of environmental documents.

As the Lead Agency, the City has prepared this categorical exemption documentation for the proposed project. This investigation documents the project's ability to meet the conditions for CEQA exemptions described in Section 15319 Annexations of Existing Facilities and Lots for Exempt Facilities, and Section 15303(d) New Construction or Conversion of Small Structures.

The annexation from unincorporated San Mateo County into the City would be an action requiring approval from the San Mateo Local Agency Formation Commission (LAFCo). The San Mateo LAFCo is a State-mandated, independent agency with countywide jurisdiction over changes in organization and boundaries of cities and special districts including annexations, detachments, incorporations and formations. LAFCo is an independent commission with jurisdiction over the boundaries of the 20 cities, 22 independent special districts, and many of the 33 county-governed special districts serving San Mateo County.

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH Act) establishes procedures for local government changes of organization, including city incorporations, annexations to a city or special district, and city and special district consolidations. LAFCos have numerous powers under the CKH Act, but those of primary

concern are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. Among the purposes of LAFCos are the discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies.

Local governments, property owners, and communities may seek approval of boundary changes from LAFCo by submitting an application to the LAFCo in the affected county. The CKH Act calls a single proposed change a *change of organization*. If two or more changes of organization are in one proposal – such as an area’s annexation to a city and detachment from a special district – It is called a reorganization.

An Annexation occurs when a city or district attaches, includes, or adds territory to its boundary. A Detachment means the exclusion, deletion, or removal of territory from a city or district. Detachment occurs when land is annexed to another agency that provides similar services. For an annexation application to be approved, the project must comply with the City’s Adopted Annexation Policies.

## **Project Description**

### Project Overview

The proposed project consists of the rezoning/annexation and General Plan Amendment of one parcel located at 244 Club Drive (APN 049-050-070), to the City. The subject parcel is located in unincorporated San Mateo County, but it is adjacent to the incorporated City to the west, east, and south and is within the City’s Sphere of Influence (SOI) (see Figure 2). The proposed project includes abandoning the existing septic system on the parcel, installing a new City-required pump station and sewer force main within the parcel, installing and connecting a new sewer service lateral to an existing 6” sewer main in Club Drive, and requesting to be detached from the County and be annexed into the City service boundary. The project site is developed with an existing single-family residence.

The project site is currently zoned R-1 (One-Family Residential District), S-71 (Devonshire Area Combining District), and DR (Design Review District) under San Mateo County’s Zoning Regulations. Upon annexation into the City the project site’s new zoning will be RS-3 (Single-Family, Low Density), with a General Plan designation of Single Family, Low Density (3 Dwelling Units, DUs/Acre). No new development is proposed with this project. Any additions to or remodeling of the existing residential home would be required to comply with the City development standards for residential districts. See Table 1 below for a summary of existing and proposed zoning and General Plan designations and utility service providers.

### Site Characteristics

The subject parcel is approximately 9,754 square feet in size or 0.22 acre and is located in the unincorporated residential community of Devonshire in San Mateo County, in the northwestern part of the City. The project site is adjacent to incorporated City territory to the east, west, and south. The Devonshire area is characterized by single-family homes located within scenic, hilly terrain. The project site is developed with a single-family house (see Figure 1).

There are no waterways or wetland features on the parcel. The project site contains existing landscaped vegetation.

The parcel is not under a Land Conservation Act Contract (Williamson Act). The project site is mapped as Urban and Built-Up Land by the state Farmland Mapping and Monitoring Program.

#### Surrounding Land Uses and Zoning

This area is largely residential, located in the hills of northwest San Carlos. Adjacent land to the east, west, and south are part of the incorporated City, zoned RS-3 (Single-Family, Low Density), and each lot contains a single-family residence. To the west of the project site is a parcel containing a California Water Service water tank (zoned RS-3) that is also within the City (See Figure 3 City of San Carlos Zoning Designations).

As discussed above, the project site is currently zoned One-Family Residential District (R-1) under the County of San Mateo Zoning Regulations and following annexation will be zoned Single-Family, Low Density (RS-3), with a General Plan designation of Single Family, Low Density (3 DUs/Acre) under the City of San Carlos Zoning Code and General Plan (respectively). Both zoning districts are intended for low-density, single-family residential development. The change in zoning and general plan land use designation proposed with the annexation is compatible with the surrounding character of the community.

#### Driveway and Access

The project site has direct driveway access to Club Drive, a paved public road. Club Drive was constructed for the Devonshire Subdivision and was dedicated as a public street to the City. Following implementation of the project, the street would remain public and maintained by the City (City of San Carlos DPW 2019).

#### Utilities

The project parcel must be annexed into the City in order to permanently connect to the sanitary sewer system available along Club Drive. The project proposal includes abandoning the existing septic system on the parcel, installing a new City-required pump station and sewer force main within the parcel, and installing, connecting a new sewer service lateral to an existing 6" sewer main in Club Drive, and requesting to be detached from the County and be annexed into the City service boundary. Following annexation, water and sanitary sewer services will continue to be provided by the City. Stormwater infrastructure is located on Club Drive and existing improvements to the project parcel already connect to the City of San Carlos storm drain system.

#### Public Services

The project site is currently served by the San Mateo County Fire Department and the San Mateo County Sheriff's Office. Following annexation, fire service would be provided by the Redwood City Fire Department under contract with the City and law enforcement services by the San Carlos Police Bureau, staffed under contract by the San Mateo County Sheriff's Office. Any student population would continue to be served by the Belmont-Redwood Shores School District (Pre-K through 8<sup>th</sup> grade) and the Sequoia Union High School District (9<sup>th</sup> -12<sup>th</sup> grades).

<b>Table 1: Existing and Proposed Conditions</b>		
	<b>San Mateo County Existing Conditions</b>	<b>City of San Carlos Proposed Conditions</b>
General Plan Designation	Medium Density Residential (6.1-8.7 DUs/Ac)	Single Family, Low Density (3 DUs/Ac)
Zoning Designation	R-1 (One-Family Residential District), S-71 (Devonshire Area Combining District, DR (Design Review District)	Pre-Zoning RS-3 (Single-Family, Low Density).
Water Provider	California Water Service Company	California Water Service Company
Sanitary Sewer Provider	Onsite septic system	City of San Carlos
Storm Drain System	City of San Carlos	City of San Carlos
School Districts	Belmont-Redwood Shores School District and Sequoia Union High School District	Belmont-Redwood Shores School District and Sequoia Union High School District
Solid Waste	Recology San Mateo County	Recology San Mateo County

Zoning Ordinance Consistency Analysis:

City of San Carlos Zoning Code (18.38.040) states:

*"Developed Lots. Annexation of lots which contain a primary structure shall comply with the following standards:*

1. *The lots shall meet the minimum lot size and density standards of this title and Title 17. Single developed properties that meet all annexation policies, with the exception of minimum lot size requirements, may be considered for annexation; provided, that further subdivision of the land is prohibited through a recorded deed restriction acceptable to the City Attorney.*
2. *The lots shall be connected to the City's sanitary sewer system or can be connected to the City's sewer to the satisfaction of the City Engineer pursuant to Title 13, Public Services.*
3. *The lots with existing properly functioning septic tank-drain field systems shall not be required to connect to a newly installed sewer line until one of the following events occurs and at that time shall be required to connect:*
  - a. *Upon sale of the property that triggers an assessment of the County Tax Assessor; or*
  - b. *Upon determination by the San Mateo County Environmental Health Services Division that the existing septic system cannot function properly or cannot be expanded to accommodate the use; and*

- c. *Failed septic systems shall not be replaced with another septic system. (Ord. 1438 § 4 (Exh. A (part)), 2011)*

Title 17 governs subdivisions and lists lot size requirements:

The parcel meets all annexation policies as described below in Table 2. Therefore, the project is consistent with the City's Zoning Ordinance requirements.

General Plan Consistency Analysis:

The San Carlos 2030 General Plan addresses land use.

The City and LAFCo have established a SOI for San Carlos. The SOI represents the area that the City may consider for annexation during the next 20 years. The SOI of San Carlos includes three distinct unincorporated areas including the Devonshire Area containing Devonshire Canyon, an "island" within the city limit, and a 17-acre Devonshire area adjacent to Club Drive and the City of Belmont. For an annexation application to be approved, the project must comply with the City's Adopted Annexation Policies.

The City has adopted residential annexation policies that apply to all residential annexations within the City's SOI. These policies are designed to regulate annexation in an efficient and orderly manner and to ensure that areas annexed into the city are compatible with all City policies. Most significantly, the policies are designed to retain the neighborhood character of the annexed area and the existing city neighborhoods.

The project is consistent with relevant City of San Carlos General Plan policies regarding land use and annexation because:

- The project parcel is contiguous on three property lines to parcels located in the City;
- The project parcel is in the process of being rezoned RS-3, consistent with requirements of potential development on five lots or less;
- Public utilities are available within Club Drive.
- The project parcel meets the density standards for developed lots listed in Chapter 17 of the City of San Carlos Zoning Code;
- The project has been analyzed under the California Environmental Quality Act and found to be exempt.

Table 2: General Plan Compliance	
General Plan Policy	Project Compliance
Policy LU-4.1: To the extent not inconsistent with this General Plan and until such time as the City approves an Annexation Ordinance, the annexation policies of the 1992 General Plan as amended by the August 13, 2001 (Resolution 2001-115, Exhibit B) Amendment to the San Carlos General Plan, shall apply to annexation requests. Policies 4.2 through 4.10 below are the Policy intent for the Annexation Ordinance.	See below:

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Policy LU-4.2: Annexation of all or portions of unincorporated residential areas shall only be permitted when public services and facilities meeting City standards are available to the lands proposed for inclusion in the city.	The project would be served by public services and facilities meeting City standards.
Policy LU4.5: Annexation of the developed parcels shall be in substantial compliance with the following criteria:	See below:
a. The parcels are contiguous to parcels located in the City of San Carlos and contiguous to city streets.	The proposed project parcel is developed and contiguous to a city street and parcels located in the City of San Carlos.
b. The parcels are connected to the city's sanitary sewer system or can be connected to the city's sewer to the satisfaction of the City Engineer.	The proposed project parcel can be connected to the city's sewer to the satisfaction of the City Engineer.
Policy LU 4.6: Parcels proposed for annexation to the City shall be rezoned.	The City is in the process of rezoning the parcel RS-3 (Single-Family, Low Density), consistent with the surrounding neighborhood as required by Zoning Code Section 18.38.030.
Policy LU-4.7: Prior to annexation of parcels, public services and facilities meeting City standards shall be installed or provisions for their installation shall have been made to the City Engineer. Public services and utilities include:	See below:
a. Construction and acceptance of improvements shall be completed prior to issuance of Building Permits or sewer connections.	The parcel will be allowed to connect to the City's sanitary sewer system. The property owner will install a new City-required pump station and sewer force main within the parcel, install and connect a new sewer service lateral to an existing 6" sewer main in Club Drive. The property owner will obtain the necessary permits to connect to the City's sanitary sewer system.
b. Construction of streets meeting City subdivision street standards from the terminus of city streets currently meeting City standards to and throughout the subdivision. Where possible and appropriate and subject to environmental, health and safety considerations, rural road standards shall apply. Assessment districts may be used by the developer for installation of portions of the street which is the responsibility of the owner of abutting unimproved lands at the time of their development.	The project does not propose the construction of streets.
Policy LU-4.8: Annexation of parcels shall be in compliance with City General Plan policies.	The proposed annexation is in compliance with General Plan policies as described above.
Policy LU-4.9: An environmental analysis under the provisions of the California Environmental	This CE evaluation constitutes the City's environmental evaluation of the project under CEQA.

Quality Act and a fiscal impact analysis shall be conducted.	
Policy LU-4.10: Allow single existing developed properties which meet all annexation policies, with the exception of minimum lot size requirements, to be considered for annexation and in no circumstances shall such properties be allowed to further subdivide.	The project site is a developed parcel with an existing single-family residence. No new development or further subdivision of land is proposed, nor would be allowed.

### Findings for a CEQA Categorical Exemption

Projects resulting in a physical change to the environment are subject to review under the California Environmental Quality Act (CEQA; Pub. Resources Code § 21000 et seq.) and the CEQA Guidelines (14 CCR §15000 et seq.).

For projects qualifying for categorical exemptions, CEQA allows the use of multiple exemptions, as applicable, for a project. The proposed single-family lot annexation is eligible for a categorical exemption under CEQA Guidelines Section 15319 (Class 19, Annexations of Existing Facilities and Lots for Exempt Facilities) which allows annexations of individual small parcels of the minimum size. The project is also eligible for a Class 3 categorical exemption for small facilities by Section 15303, New Construction or Conversion of Small Structures for the construction of a new pump station and force main and sanitary sewer line needed to connect to the Sanitary Sewer main in Club Drive. Project consistency with these CEQA Guidelines is described below.

### Class 19, Annexations of Existing Facilities and Lots for Exempt Facilities

#### CEQA Guidelines Per Section 15319:

*Class 19 consists of only the following annexations:*

*(a) Annexations to a city or special district of areas containing existing public or private structures developed to the density allowed by the current zoning or pre-zoning of either the gaining or losing governmental agency whichever is more restrictive, provided, however, that the extension of utility services to the existing facilities would have a capacity to serve only the existing facilities.*

*(b) Annexations of individual small parcels of the minimum size for facilities exempted by Section 15303, New Construction or Conversion of Small Structures (Cal. Code Regs. Tit. 14, § 15319*

**Project Consistency.** The proposed project is an annexation of one individual parcel, measuring less than one acre. The site is developed with an existing single-family residence with no new proposed development. The proposed project would be consistent with the City's pre-zoning designation of RS-3 (Single-Family, Low Density), the City's General Plan Designation of Single Family, Low Density (3DUs/Ac). The project is also consistent with applicable requirements of the City of San Carlos Zoning Code Section 18.38.040 and all applicable General Plan Land Use policies related to annexation (see Tables 1 and 2). The site would be served by the City's sanitary sewer system which has service capacity to serve this site. All other utility providers would remain the same (see Table 1). Therefore, the proposed project is eligible for a Class 19 CEQA Categorical Exemption.

### **Class 3, New Construction or Conversion of Small Structures**

#### **CEQA Guidelines Per Section 15303:**

*Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include but are not limited to:*

*(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.*

**Project Consistency.** The proposed annexation includes abandoning the existing septic system on the parcel, installing a new City-required pump station and sewer force main within the parcel, and installing and connecting a new sewer service lateral to an existing 6" sewer main in Club Drive connection to the City of San Carlos sanitary sewer. The property owner would be responsible for obtaining relevant permits from the City for this utility work. The utility extension would be of reasonable length to serve the single-family residence. Therefore, the proposed project is eligible for a Class 3 CEQA Categorical Exemption.

#### **Exceptions to CEQA Exemptions**

Section 15300.2 lists the "exceptions" to CEQA exemptions, or situations in which a Categorical Exemption cannot be used for a project. These are:

**(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. Therefore, these classes are considered to apply instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.**

The proposed project is classified as a Class 3 Exemption, and is located within scenic, hilly terrain, in the northwestern part of the City. The project parcel is not located within a particularly sensitive environment. There are no resources of hazardous or critical concern located on or near the project parcel, as designated, mapped, and adopted pursuant to law by federal, state, or local agencies. Therefore, the proposed annexation is not subject to this exception.

**(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.**

The proposed project is an annexation of developed land and does not include any new development. The project would involve minor ground disturbing activities to install the new City-required pump station and service line to connect the annexed parcel to the City of San Carlos's sanitary sewer system. The impact of this construction would be regulated through permits issued by the City and the construction would not have significant environmental impacts. While other individual parcels in this same area have been annexed in the past, and others will be annexed into the City in the future, the annexation does not have a cumulative impact that is significant over time. Therefore, the annexation would not contribute to 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.**

The proposed project is typical of an annexation project and no unusual circumstances exist under the proposed project. The project would involve minor ground disturbing activities to install the new City-required pump station to connect the annexed parcel to the City of San Carlos's sanitary sewer system. The proposed project would not have significant effects on the environment as the existing development on the parcel is consistent with City of San Carlos requirements and no new development is included with the project. The project parcel is contiguous with the City of San Carlos city limits, the City's pre-zoning of the parcel indicates a single-family development intensity similar to the current San Mateo County zoning designation, and the annexation would not cause a boundary change of a public service provider.

The proposed annexation is consistent with City Zoning Ordinance and General Plan requirements for annexations. The project meets all other annexation policies and further subdivision of the land would be prohibited. Therefore, the project will not have a significant effect on the environment due to unusual circumstances. The proposed annexation is not subject to this exception.

**(d) Scenic Highways. A categorical exemption shall not be used for a project which may result to 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. This does not apply to improvements which are required as mitigated by an adopted negative declaration or certified EIR.**

The project would not affect scenic resources within an officially designated state scenic highway. The nearest officially designated state scenic highway is State Route 280, which is approximately 4,459 feet (0.84 mile) to the west of the project site and is not visible from or to the project site. Additionally, no development is proposed as part of this project. Therefore, the proposed annexation is not subject to this exception.

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

The project is not located on a site included on a list compiled pursuant to Section 65962.5 of the Government Code. The nearest Cortese list site is Carlmont High School, located at 1400 Alameda De Las Pulgas, Belmont, approximately 0.39 mile north of the project site (DTSC 2024). However, according to the Cortese List, the site is classified as Inactive-Withdrawn. The project site is not within 5,000 feet of sites that require cleanup according to the State Water Resources Control Board (SWRCB 2019).

**(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.**

The project consists of the annexation of one developed parcel with no new development. No known archaeological sites, artifacts, or features are known to be in or near the project site. However, the project would involve ground disturbing activities to install a new City-required pump station to connect the annexed parcel to the City of San Carlos's sanitary sewer system. In the unlikely event that archeological or human remains are discovered during ground disturbing activities, the City will implement the following protocols:

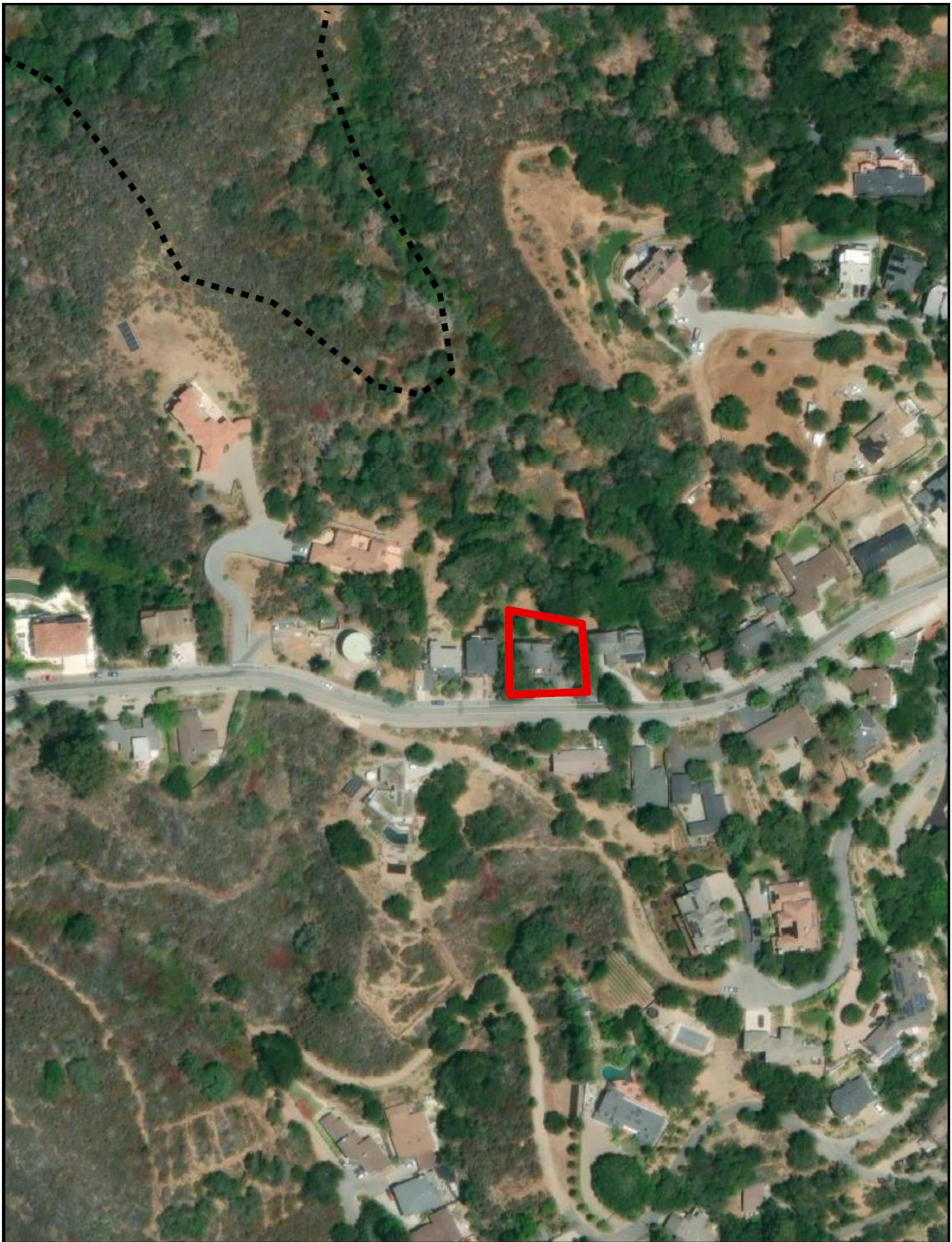
- **Inadvertent Discovery of Archaeological Resources.** The City shall retain a Professional Archaeologist on an “on- call” basis during ground disturbing construction activities to review, identify and evaluate any inadvertent discoveries of archaeological resources. The Professional Archaeologist shall review and evaluate any discoveries to determine if they are historical resource(s) and/or unique archaeological resources under the California Environmental Quality Act (CEQA).

If the Professional Archaeologist determines that any cultural resources exposed during construction constitute a historical resource and/or unique archaeological resource under CEQA, he/she shall notify the City and other appropriate parties of the evaluation and recommend measures to mitigate or avoid significant adverse changes to the archaeological resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures, in accordance with California Public Resources Code Section 15064.5.

- **Inadvertent Discovery of Human Remains.** In accordance with Section 7050.5, Chapter 1492 of the California Health and Safety Code and Sections 5097.94, 5097.98 and 5097.99 of the Public Resources Code, if potential human remains are found, the lead agency (City of San Carlos) staff and the San Mateo County Coroner shall be immediately notified of the discovery. The coroner would provide a determination regarding the nature of the remains within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, can occur until a determination has been made. If the County Coroner determines that the remains are, or are believed to be, of Native American ancestry, the coroner would notify the Native American Heritage Commission within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the Most Likely Descendant from the deceased Native American. Within 48 hours of this notification, the Most Likely Descendant would recommend to the lead agency their preferred treatment of the remains and associated grave goods.

#### **Findings:**

Based on the above information, the proposed annexation is categorically exempt under CEQA Section 15319(a)(b), and Section 15303(d).



Source: Esri 2024

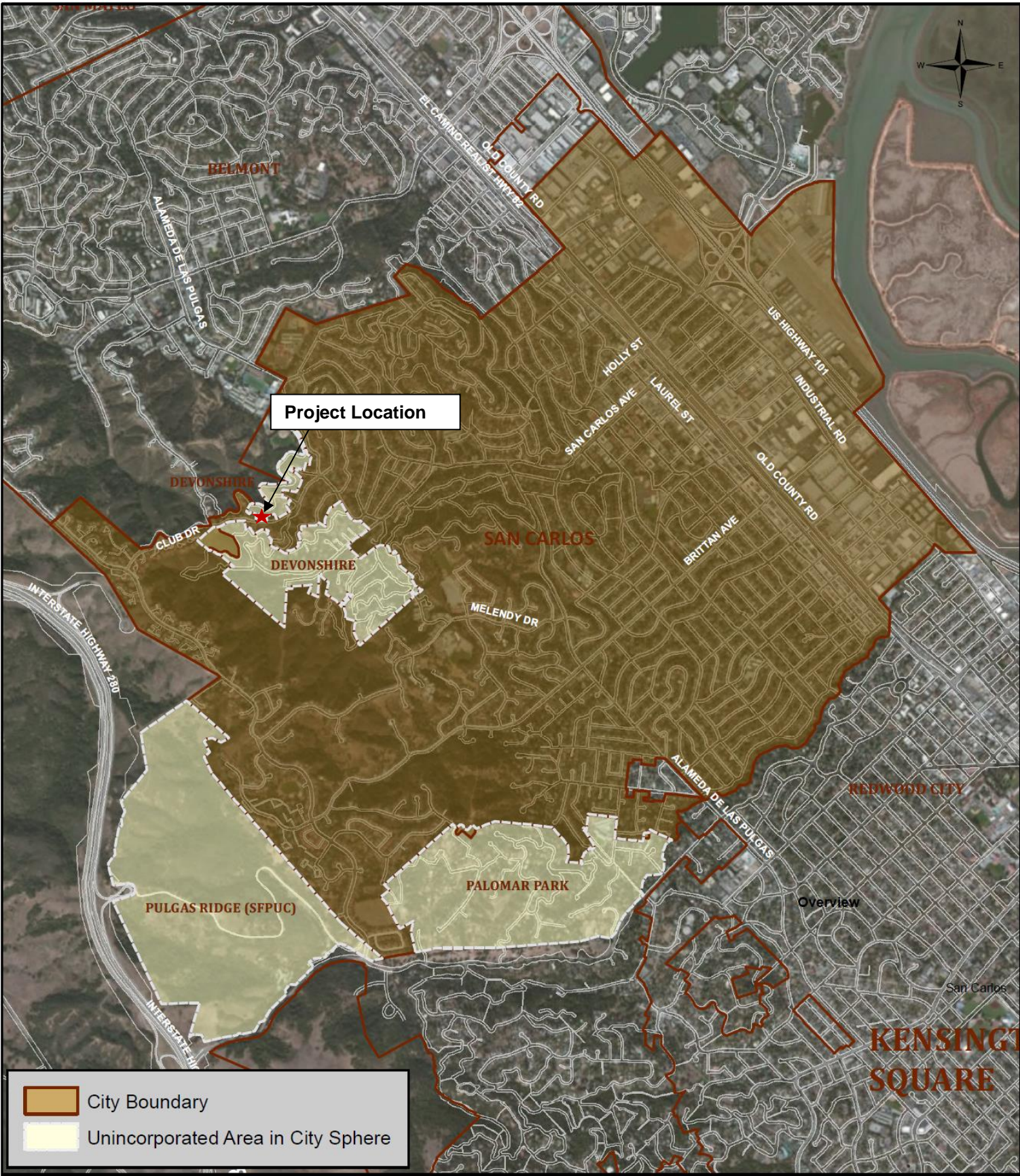
- Belmont City Border
- Project Boundary -244 Club Dr.

0 0.01 0.02 0.04 0.06 0.08 Miles



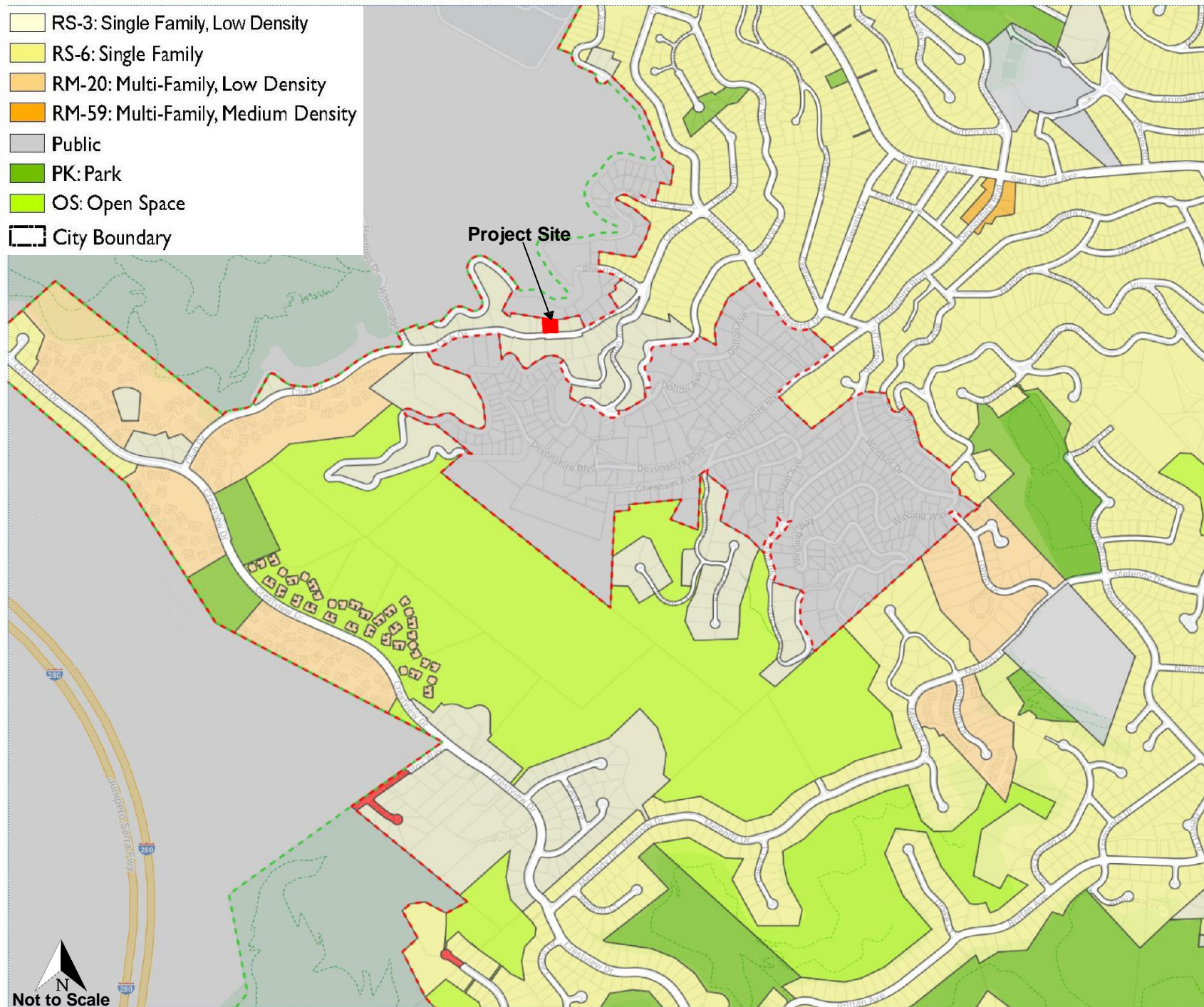
**Figure 1 Project Vicinity**  
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**Figure 2** San Carlos Sphere of Influence  
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**Figure 3** City of San Carlos Zoning Designations

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