



State of California - Department of Fish and Wildlife  
**2026 ENVIRONMENTAL DOCUMENT FILING FEE CASH RECEIPT**  
 DFW 753.5a (REV. 01/01/26) Previously DFG 753.5a

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RECEIPT NUMBER:  
 21 — 03/03/2026 — 040  
 STATE CLEARINGHOUSE NUMBER (If applicable)

**SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.**

LEAD AGENCY <b>CITY OF SAN RAFAEL PUBLIC WORKS</b>	LEAD AGENCY EMAIL	DATE <b>03/03/2026</b>
COUNTY/STATE AGENCY OF FILING <b>Marin</b>	DOCUMENT NUMBER	

PROJECT TITLE

**CANAL NEIGHBORHOOD ACTIVE TRANSPORTATION ENHANCEMENTS PROJECT**

PROJECT APPLICANT NAME <b>CITY OF SAN RAFAEL PUBLIC WORKS</b>	PROJECT APPLICANT EMAIL	PHONE NUMBER <b>(415)256-5549</b>
PROJECT APPLICANT ADDRESS <b>111 MORPHEW ST</b>	CITY <b>SAN RAFAEL</b>	STATE <b>CA</b>
		ZIP CODE <b>94901</b>

**PROJECT APPLICANT** (Check appropriate box)

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

**CHECK APPLICABLE FEES:**

- |                                                                                                     |            |    |             |
|-----------------------------------------------------------------------------------------------------|------------|----|-------------|
| <input type="checkbox"/> Environmental Impact Report (EIR)                                          | \$4,227.50 | \$ | <u>0.00</u> |
| <input type="checkbox"/> Mitigated/Negative Declaration (MND)(ND)                                   | \$3,043.75 | \$ | <u>0.00</u> |
| <input type="checkbox"/> Certified Regulatory Program (CRP) document - payment due directly to CDFW | \$1,437.25 | \$ | <u>0.00</u> |

- Exempt from fee  
      Notice of Exemption (attach)  
      CDFW No Effect Determination (attach)  
 Fee previously paid (attach previously issued cash receipt copy)

- |                                                                                                             |          |    |                   |
|-------------------------------------------------------------------------------------------------------------|----------|----|-------------------|
| <input type="checkbox"/> Water Right Application or Petition Fee (State Water Resources Control Board only) | \$850.00 | \$ | <u>0.00</u>       |
| <input checked="" type="checkbox"/> County documentary handling fee                                         |          | \$ | <u>50.00</u>      |
| <input type="checkbox"/> Other                                                                              |          | \$ | <u>          </u> |

**PAYMENT METHOD:**

- Cash   
  Credit   
  Check   
  Other   
                                 
 TOTAL RECEIVED   
 \$ 50.00

SIGNATURE <b>X</b> <i>L. Vawter</i>	AGENCY OF FILING PRINTED NAME AND TITLE <b>MARIN COUNTY CLERK, L. VAWTER, DEPUTY COUNTY CLERK</b>
----------------------------------------	------------------------------------------------------------------------------------------------------

Notice of Exemption

21-2026-040

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): City of San Rafael Public Works
111 Morphew Street
San Rafael, CA 94901

County Clerk

County of: Marin

3501 Civic Center Drive Suite 234

San Rafael CA 94903

(Address)

Project Title: Canal Neighborhood Active Transportation Enhancements Project

Project Applicant: City of San Rafael Department of Public Works

Project Location - Specific:

The project is in the Canal neighborhood, which is bounded by Interstate 580 (I-580) to the southeast, United States Route 101 (US-101) to the east, Bellam Boulevard to the south, and San Rafael Creek to the north.

Project Location - City: San Rafael Project Location - County: Marin

Description of Nature, Purpose and Beneficiaries of Project:

The City of San Rafael proposes to implement a number of pedestrian, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood.

Name of Public Agency Approving Project: City of San Rafael

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

FILED

MAR 03 2026

SHELLY SCOTT
MARIN COUNTY CLERK
BY: L. Vautel, Deputy

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: Class 1 Section 15301
Statutory Exemptions. State code number: Public Resources Code Section 21080.25

Reasons why project is exempt:

The project would include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, crosswalk enhancements, transit enhancements, bicycle boulevard improvements, and lighting improvements along existing roads and pathways within the project area. Due to its nature, the project properly qualifies for an exemption under Public Resources Code Section 21080.25(b)(1), which establishes statutory exemptions for projects related to the institution or increase of public mass transit, including bus, pedestrian and bicycle facilities.. Additionally, the proposed project meets the criteria for qualifying for a Class 1 Categorical Exemption, as identified in Section 15301 of the CEQA Guidelines as it includes improvements to existing roadways and trails with little to no expansion of the existing use.

Lead Agency
Contact Person: Grey Melgard Area Code/Telephone/Extension: 415.256.5549

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: April Miller Date: 03/03/2026 Title: Public Works Director

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:

POSTED 3/3/26 TO 4/2/26

## MEMORANDUM

**DATE:** February 20, 2026

**To:** Becky Dower, Associate Principal, BKF

**FROM:** Shanna Guiler, Associate/Senior Environmental Planner, LSA  
Cesar Madrigal, Environmental Planner, LSA

**SUBJECT:** Memorandum in Support of a Statutory Exemption and Categorical Exemption for the Canal Active Transportation Enhancements Project, San Rafael, Marin County, California

This memorandum was prepared to support a Statutory Exemption and a Categorical Exemption under the California Environmental Quality Act (CEQA) for the proposed Canal Neighborhood Active Transportation Enhancements Project (project). The City of San Rafael (City) proposes to implement the Canal Neighborhood Active Transportation Enhancements Project, which includes construction of various pedestrian, lighting, bicycle, and transit enhancements in the Canal neighborhood in San Rafael, Marin County.

### BACKGROUND

The project is in San Rafael's Canal neighborhood, Marin County. Limited shopping, education, health services, or job opportunities are available within the neighborhood, and travel to other locations is constrained by poor bicycle and pedestrian connections. This is particularly problematic as residents have low vehicle ownership rates and are largely reliant on walking, bicycling, and public transit. According to the Healthy Places Index, 28 percent of workers in the Canal neighborhood commute by transit, walking or cycling; this is higher than 94 percent of other California Census tracts.

In 2002, the Metropolitan Transportation Commission (MTC) initiated the Community-Based Transportation Planning (CBTP) program to identify and create an action plan to address mobility needs for lower-income communities through a collaborative effort from residents, community organizations, and transportation agencies. CBTPs include a demographic analysis of the area, a list of community-prioritized transportation gaps and barriers, strategies and/or solutions to address these gaps, identification of potential funding sources, a list of stakeholders to implement the plan, and documented results of community outreach strategies. In conjunction with these goals, the City prepared the first CBTP for the City's Canal neighborhood in 2006. Subsequently, in 2018, the MTC provided supplemental funding to update the CBTPs, and the City prepared and approved the second CBTP for the Canal neighborhood (Canal Neighborhood CBTP) in June 2022.

The City has identified the Canal Neighborhood as a proposed Priority Development Area and an Equity Priority Community, thereby making it a CBTP candidate. As part of the Canal Neighborhood CBTP, the City identified recommended transportation solutions and prioritized them based on level of community support.

The project would support the complete design and construction of several pedestrian, lighting, bicycle, and transit enhancements in the Canal neighborhood, in accordance with the recommendations identified in the Canal Neighborhood CBTP. These enhancements would improve mobility, equity, safety, and comfort for people walking, biking, and using transit in the Canal neighborhood and would help residents reach key destinations such as schools, parks, and shopping in and out of the community.

The project has received funding through the Active Transportation Program, and the City committed additional funding to augment the design and construction budget for the project.

Residents have voiced their need for these improvements as part of the Canal Neighborhood CBTP.

## PROJECT LOCATION

The project is in the Canal neighborhood, which is bounded by Interstate 580 (I-580) to the southeast, United States Route 101 (US-101) to the east, Bellam Boulevard to the south, and San Rafael Creek to the north. Regional access to the project area is provided by I-580 and US-101 (see **Figure 1: Regional Location**). Local access to the project area is provided by Bellam Boulevard and Francisco Boulevard (see **Figure 2: Project Location**).

The northern part of the Canal neighborhood includes natural features including the San Rafael Canal, a segment of the San Francisco Bay Trail, and parks and schools such as Pickleweed Park and Bahia Vista Elementary School. The southern part of the neighborhood includes a mix of local serving commercial uses, office buildings, auto repair and sales businesses, and miscellaneous commercial and industrial services.

## PROJECT OBJECTIVES

The objectives of the project are to:

- Enhance corridor-wide pedestrian, bicycle, and transit facilities and connectivity
- Increase safety through lighting improvements, crosswalk enhancements, and sidewalk gap closures

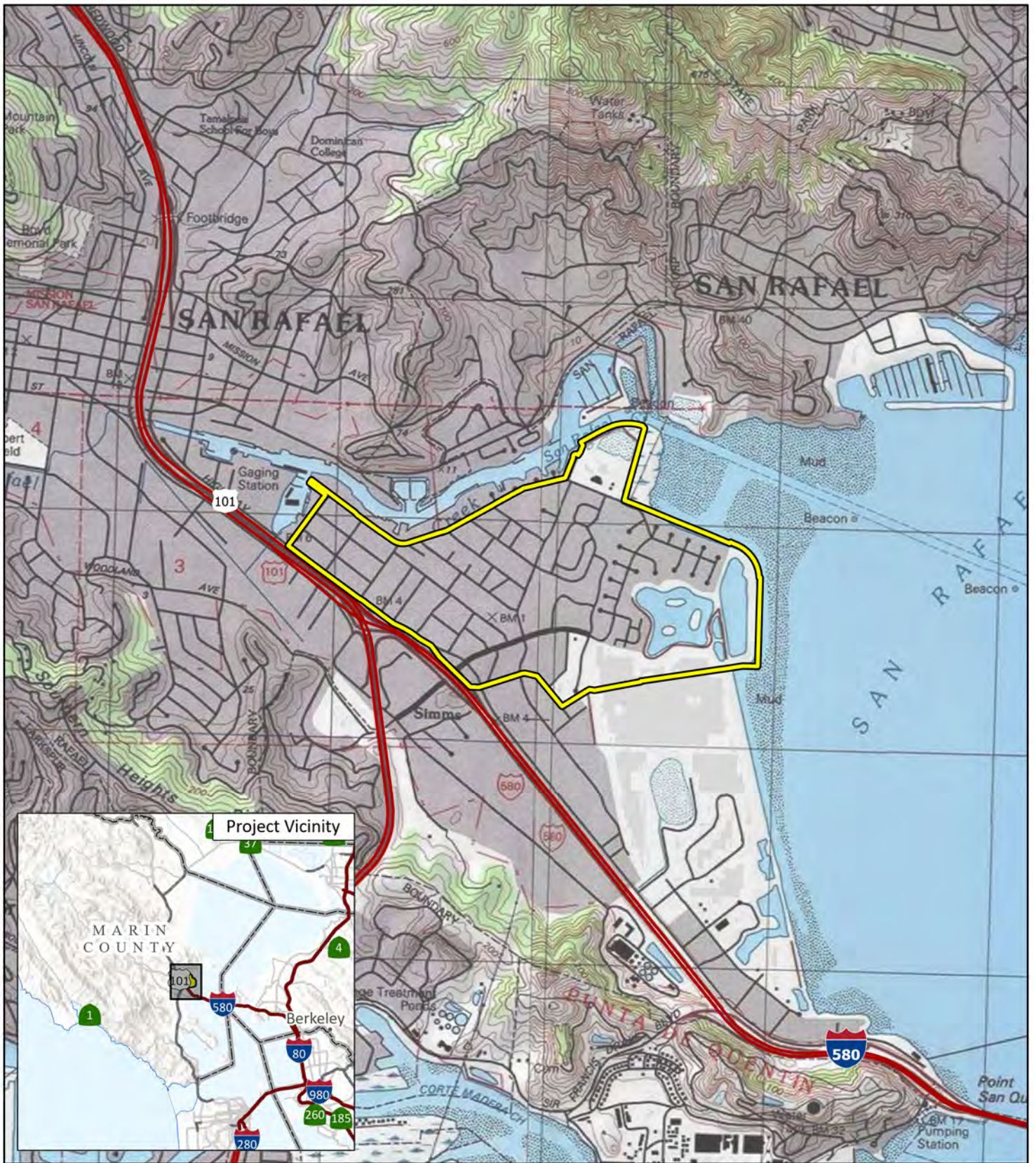

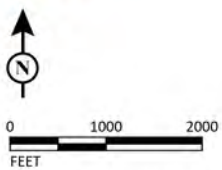


FIGURE 1

LSA

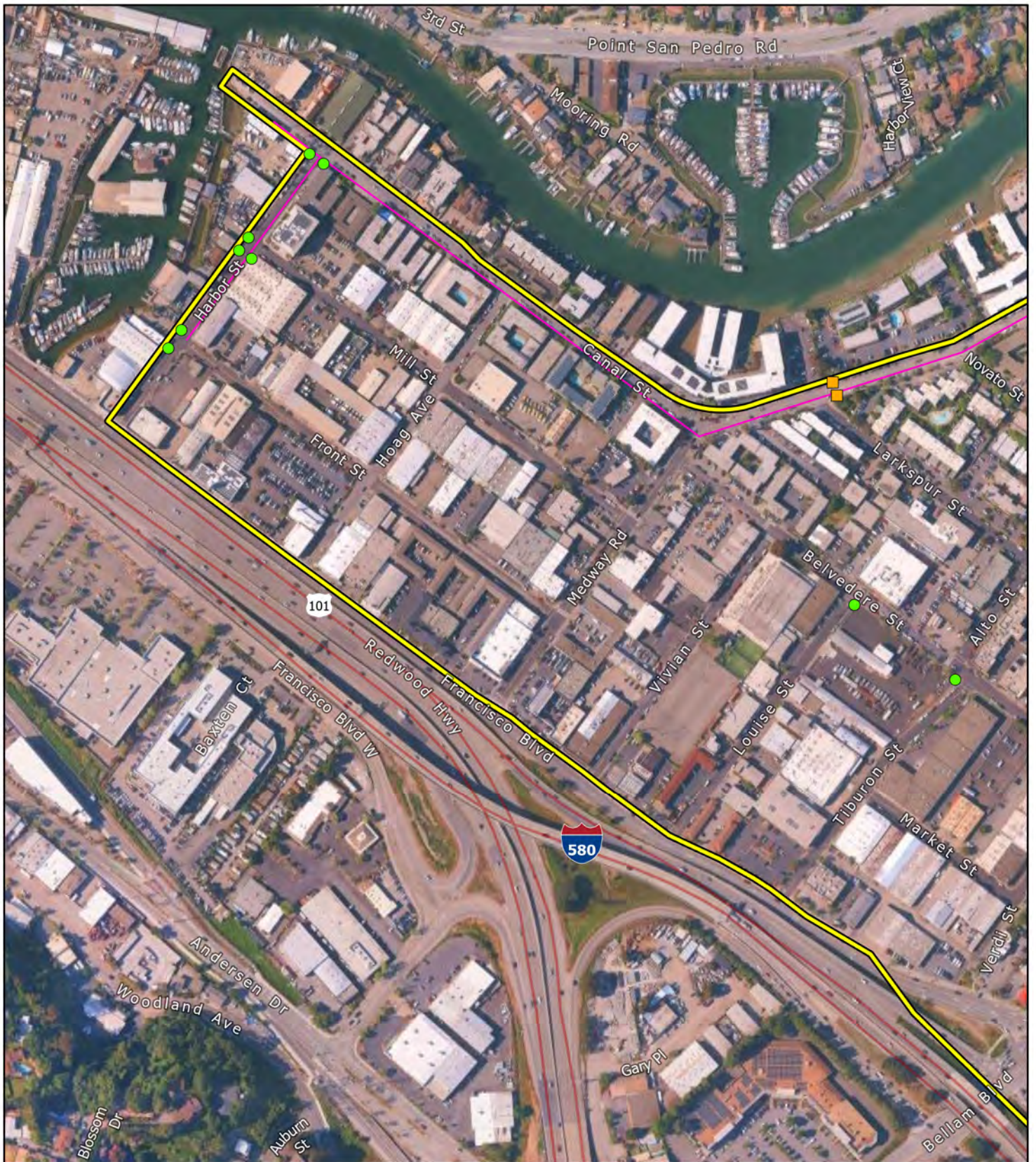
 Project Location







Canal Neighborhood Active Transportation Enhancements Project  
Regional Location

SOURCE: USGS 7.5' Quad - San Quentin (1993) and San Rafael (1993), CA

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LSA

-  Project Location
-  Proposed Bike Boulevard Improvements
-  Proposed Curb Ramp
-  Proposed Rectangular Rapid Flashing Beacon

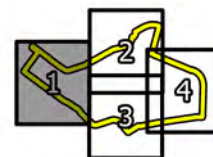


FIGURE 2  
Sheet 1 of 4







0 187.5 375  
FEET

SOURCE: Google Maps (2025)

Canal Neighborhood Active Transportation Enhancements Project  
Project Location



LSA

-  Project Location
-  Proposed Bike Boulevard Improvements
-  Proposed Curb Ramp
-  Proposed Rectangular Rapid Flashing Beacon

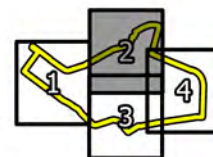


FIGURE 2  
Sheet 2 of 4





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FEET

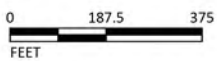
SOURCE: Google Maps (2025)

Canal Neighborhood Active Transportation Enhancements Project  
Project Location



LSA

-  Project Location
-  Proposed Curb Ramp



SOURCE: Google Maps (2025)

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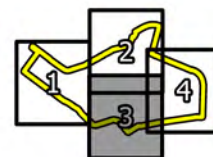




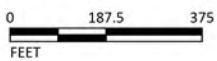
FIGURE 2  
Sheet 3 of 4

Canal Neighborhood Active Transportation Enhancements Project  
Project Location



LSA

-  Project Location
-  Proposed Curb Ramp



SOURCE: Google Maps (2025)

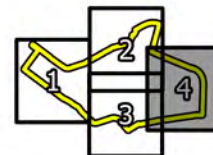


FIGURE 2  
Sheet 4 of 4

Canal Neighborhood Active Transportation Enhancements Project  
Project Location

## PROJECT DESCRIPTION

The City proposes to implement a number of pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. All improvements would be constructed within the public right-of-way along existing City streets or on City-owned property (e.g., along the San Francisco Bay Trail, at Pickleweed Park, and along the Bahia Vista Trail). Bicycle improvements would construct bicycle boulevard treatments along Harbor Street and Canal Street in the neighborhood's bicycle network and add secure bicycle parking at Pickleweed Park. Transit improvements would add transit shelter enhancements including transit seating, lighting, and wi-fi improvements at five high-ridership stops. The proposed project would also construct a new transit stop along a high-use transit route.

The proposed bicycle boulevard treatments would start at Harbor Street and extend onto Canal Street, eventually ending at the junction of Canal Street and Bahia Way. Additionally, the project would install five new, rectangular, rapid flashing beacons at the existing crosswalks along Canal Street, between Larkspur Street and Bahia Way. The project also proposes new curb ramps along Harbor Street, Mill Street, Canal Street, Belvedere Street, Verdi Street, and Fairfax Street.

The proposed project would also install lighting improvements such as lighting improvements along Hoag Street, Harbor Street, Canal Street, Belvedere Street, Verdi Street, Larkspur Street, Novato Street, Fairfax Street, Sonoma Street, and around the Pickleweed Park and the San Francisco Bay Trail.

Specifically, the proposed lighting improvements within the proposed project area include:

- Installation of approximately 42 16-foot-tall overhead light fixtures spaced 100 feet apart with 23 of these light fixtures being placed along the existing Class I Path around Pickleweed Park and the remaining 19 light fixtures being placed along the existing San Francisco Bay Trail.
- Installation of approximately 186 bollard-style light fixtures spaced approximately 25 feet apart and located on alternating sides of the existing Class I Paths, with 137 of these light fixtures being placed along the San Francisco Bay Trail and the remaining 49 along the Bahia Vista Trail.

In addition to the improvements listed above, the project proposes widening sidewalks from 4 to 6 feet along the following streets within the project area:

- Southbound side of Hoag Street
- Eastbound side of Front Street
- Southbound side of Harbor Street
- Eastbound side of Mill Street

- Southbound side of Vivian Street
- Southbound side of Tiburon Street
- Eastbound side of Market Street (which would require removal of some of the existing on-street parking)
- Northbound side of Verdi Street (which would require removal of some of the existing on-street parking)
- Both sides of Louise Street (which would require removal of the existing on-street parking)

### CONSTRUCTION DETAILS

Construction staging and grading would take place within the existing right-of-way or on City-owned property. Construction would require excavation to a maximum depth of approximately 15 feet for the overhead lighting fixtures proposed at Pickleweed Park and along the San Francisco Bay Trail, 7 feet for streetlight foundations and approximately 12 inches for the sidewalk areas. Additional construction activities may include storm drain relocation, which would be limited to relocating catch basins to facilitate curb ramp installation. Other utilities within the proposed project area are anticipated to be protected in place. Minimal earthwork is anticipated and would not exceed more than 1,000 cubic yards of cut and fill. Approximately 100 square feet of vegetation removal is anticipated for lighting improvements along the San Francisco Bay Trail, and two street trees in poor health at 90 Louise Street may be removed as a result of the proposed project improvements. The overall footprint of construction would be approximately 1 acre.

The proposed project is anticipated to begin final design in spring 2027. Construction is anticipated to begin in spring 2028 and be completed by fall 2028 and take approximately 120 working days. Construction of the proposed project is expected to have approximately 10 workers on site each working day, with the estimated total cost of construction to be approximately \$4 million.

### SENATE BILL 288 AND SENATE BILL 922

In September 2020, Governor Newsom signed Senate Bill 288 (SB 288) into law. SB 288 amends the California Environmental Quality Act (CEQA), to provide streamlining for certain types of transportation-related projects. Specifically, SB 288 creates Public Resources Code Section 21080.25, which establishes statutory exemptions for projects related to the institution or increase of public mass transit, including bus, bus rapid transit, light rail, and passenger rail, or commuter services, including pedestrian and bicycle facilities. This list of projects, established in Public Resources Code Section 21080.25(b) have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA.

Senate Bill 922 (SB 922), approved by Governor Newsom in September 2022, expands upon SB 288 to expedite bike, pedestrian, light rail, and rapid bus projects. The bill amends Public Resources Code Sections 21080.20 and 21080.25, and extends the existing exemption for seven more years,

through January 1, 2030. The bill also removes certain eligibility requirements previously required (e.g. now not all projects have to be in urbanized areas), adds “active transportation plans” and “pedestrian plans” to the list of exempt projects, imposes new requirements for anti-displacement analyses for projects exceeding \$100 million, and adds new requirements for projects that exceed \$50 million. Furthermore, lead agencies must file a Notice of Exemption and hold a public hearing when implementing an exemption under SB 922.

## STATUTORY EXEMPTION

As described above, SB 288 creates Public Resources Code Section 21080.25, which establishes statutory exemptions for projects related to the institution or increase of public mass transit, including bus, bus rapid transit, light rail, and passenger rail, or commuter services, including pedestrian and bicycle facilities. This list of projects, established in Public Resources Code Section 21080.25(b) have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the project, and to demonstrate that the project qualifies for a CEQA Exemption, consistent with the provisions of Public Resources Code Section 21080.25.

Public Resources Code Section 21080.25(b)(1) states that CEQA shall not apply to “pedestrian and bicycle facilities, including new facilities. Bicycle facilities include bicycle parking, bicycle sharing facilities, and bikeways, as defined in Section 890.4 of the Streets and Highways Code.” Section 890.4 of the Streets and Highways Code defines these facilities as all facilities that provide primarily for, and promote bicycle travel (e.g., bike paths [Class I bikeways], bike lanes [Class II bikeways], and bike routes [Class III bikeways] and cycle tracks [Class IV bikeways]).

As stated above, the project would include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, crosswalk enhancements, transit enhancements, bicycle boulevard improvements, and lighting improvements within the project area to enhance corridor-wide pedestrian, bicycle, and transit facilities and connectivity. These improvements would enhance safety and visibility for all travelers within the project area and also improve connectivity to the Pickleweed Park and the San Francisco Bay Trail. Due to its nature, the project properly qualifies for an exemption under Public Resources Code Section 21080.25(b)(1) and, as a result, would not have a significant effect on the environment. Additionally, the analysis provided below shows that the proposed project meets the criteria for qualifying for the statutory exemption, as identified in Public Resources Code Section 21080.25(c).

The City of San Rafael City Council maintains the authority to make the final decision on the project design and implementation. There is an ongoing community conversation around the inclusion of lighting improvements along Starkweather Path as part of the proposed project. City staff are working with the affected communities to identify needs and areas of concern related to proposed improvements. However, the Statutory Exemption for the project would remain valid with or without the inclusion of lighting improvements along Starkweather Path, as the project would still properly qualify for an exemption under Public Resources Code Section 21080.25(b)(1).

## STATUTORY EXEMPTION CRITERIA

In addition to meeting the definition of exempt projects established in Public Resources Code Section 21080.25 (e.g., pedestrian and bicycle facilities), the project must meet specific criteria, as specified in Public Resources Code Section 21080.25(c), Public Resources Code Section 21080.25(d), and Public Resources Code Section 21080.25(e) in order to be considered exempt under Public Resources Code Section 21080.25. Each of the criteria established in the Public Resources Code Section 21080.25(c)(d)(e) is listed below, followed by an explanation of why the proposed project meets those criteria.

### *Criterion (1): Lead Agency*

- a. *A local agency is carrying out the project and is the lead agency for the project. (Section 21080.25(c)(1))*

As stated above, the project would be implemented by the City of San Rafael, a local public agency. The City is both the project proponent and Lead Agency for environmental review. Therefore, the proposed project meets this criterion.

### *Criterion (2): Addition of Lanes, Widening, and Physical Infrastructure*

- b. *The project does not induce single-occupancy vehicle trips, add additional highway lanes, widen highways, or add physical infrastructure or striping to highways except for minor modifications needed for the efficient and safe movement of transit vehicles, bicycles, or high-occupancy vehicles, such as extended merging lanes, shoulder improvements, or improvements to the roadway within the existing right of way. The project shall not include the addition of any auxiliary lanes. (Section 21080.25(c)(2))*

The project would include pedestrian, bicycle, and transit enhancements within the Canal Neighborhood, largely within the existing roadway right-of-way. The project does not include the addition of any physical infrastructure that would increase automobile capacity within any City right-of-way within the project area. Furthermore, the project would not induce single-occupancy vehicle trips as it involves improvements related to pedestrian, bicycle, transit, and lighting infrastructure within the project area. Therefore, the proposed project meets this criterion.

### *Criterion (3): Demolition of Affordable Housing Units*

- c. *The construction of the project shall not require the demolition of affordable units. (Section 21080.25(c)(3))*

The project does not require the demolition of any affordable residential units. As stated earlier, the project would occur within the Canal Neighborhood within the City's existing right-of-way and implement pedestrian, bicycle, transit, and lighting improvements within the project area. Therefore, the project would not require demolition of any affordable housing units

*Criterion (4): Projects Exceeding \$100,000,000*

- d. For projects exceeding \$100,000,000 in 2026 United States dollars, a project shall also meet all of the following:*
- 1) The project is incorporated in a regional transportation plan, sustainable communities strategy, general plan or other plan that has undergone a programmatic-level environmental review in the last 10 years.*
  - 2) The project's construction impacts are fully mitigated consistent with applicable law.*
  - 3) The lead agency shall complete and consider the results of a project business case and racial equity analysis. The Office of Planning and Research may set guidelines for the project business case and the racial equity analysis or delegate that authority to metropolitan planning organizations.*
  - 4) The lead agency shall hold noticed public meetings as follows:*
    - a) Before determining that a project is exempt pursuant to this section, the lead agency shall hold at least three noticed public meetings in the project area to hear and respond to public comments.*
    - b) At least one of the three public meetings shall review the project business case and the racial equity analysis. The review of these documents does not inhibit or preclude application of this section.*
    - c) The lead agency shall conduct at least two noticed public meetings annually during project construction for the public to provide comments.*
    - d) The public meetings held pursuant to clauses (a) to (c) above, inclusive, shall be in the form of either a public community planning meeting held in the project area or in the form of a regularly scheduled meeting of the governing body of the lead agency. (Section 21080.25(d)(1))*

As identified above, construction of the project would be approximately four million dollars. The project would not exceed \$100,000,000 in 2026 United States dollars; therefore, the additional criteria identified under this criterion do not apply to the project.

Further, the project has been designed to minimize environmental impacts and fully mitigate construction impacts. Additionally, the project is located primarily within an urbanized area and all construction activities would be conducted in accordance with the City of San Rafael's General Provisions and Standards of Conditions, which apply to encroachment permits within the City right-of-way, the City of San Rafael Municipal Code, and the Uniform Construction Standards and Specifications of the Cities of Marin. These general provisions include standard measures that would reduce the potential for impacts to any environmental resources within the project area. With the

implementation of identified standard measures, there would be no significant environmental impacts under CEQA.

*Criterion (5): Project Exceeding \$50,000,000*

- e. For a project exceeding fifty million dollars (\$50,000,000), the lead agency shall hold public meetings in accordance with the requirements established in SB 922. (*Section 21080.25(e)(1)*)

As identified above, construction of the project would be approximately four million dollars. The project would not exceed \$50,000,000 dollars in 2026 United States dollars. Additionally, the City is the lead agency of the project and would take an action at a public meeting of its governing board to certify that the project will be completed.

*Criterion (6): Lead Agency Public Meeting Action*

- f. *The Lead Agency shall take an action at a public meeting of its governing board to certify that the project will be completed by a skilled and trained workforce. (Section 21080.25(f)(1))*

The project would be constructed by a skilled and trained workforce consistent with the City of San Rafael standard contract terms. The City's standard contract language requires all work to be performed in an efficient skillful manner following the best practices in compliance with contract documents and applicable laws, regulations, codes, standards, and permits. Therefore, the proposed project meets this criterion.

## CATEGORICAL EXEMPTION

Article 19 of the *State CEQA Guidelines* includes, as required by PRC Section 21084, a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the proposed project, and to demonstrate that the proposed project qualifies for a CEQA Exemption as an Existing Facility (Class I), consistent with the provisions of *State CEQA Guidelines* Sections 15301 and 15300.2. Specifically, the information provided herein shows the following:

- a. The project qualifies for an exemption under *State CEQA Guidelines* Sections 15301 (i.e., Class 1) and as a result, would not have a significant effect on the environment.
- b. The analysis shows there are no exceptions to qualifying for the exemption, as identified in *State CEQA Guidelines* Section 15300.2.

*State CEQA Guidelines* Section 15301, Existing Facilities, defines Class 1 projects as the operation, repair, maintenance, permitting, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible, or no expansion of existing or former use. Specifically, Section 15301(c) includes existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails and similar facilities, and other alterations

such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes.

As described in the Project Description, the project would include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, crosswalk enhancements, transit enhancements, bicycle boulevard improvements, and lighting improvements within the project area to enhance corridor-wide pedestrian, bicycle, and transit facilities and connectivity. These improvements would enhance safety and visibility for all travelers within the project area and also improve connectivity to the Pickleweed Park and the San Francisco Bay Trail. All proposed improvements would occur within the existing public right-of-way or on City-owned land established for recreation use/multi-modal transportation (e.g., along the San Francisco Bay Trail, at Pickleweed Park, and along the Bahia Vista Trail), with little to no expansion of the built-environment footprint. Therefore, the proposed project properly qualifies for an exemption under *State CEQA Guidelines* Sections 15301.

As the proposed project qualifies for an exemption under *State CEQA Guidelines* Sections 15301 (i.e., Class 1), the proposed project would not have a significant effect on the environment. Additionally, the following analysis demonstrates that there are no exceptions to qualifying for the CE, as identified in *State CEQA Guidelines* Section 15300.2.

## EXCEPTIONS TO CATEGORICAL EXEMPTIONS

In addition to investigating the applicability of *State CEQA Guidelines* Sections 15301 (Class 1) to the proposed project, this memorandum assesses whether any of the exceptions to qualifying for the CE are present. The following analysis compares the criteria of *State CEQA Guidelines* Section 15300.2 (Exceptions) to the proposed project. As described in the analysis below, LSA has determined that none of the exceptions are applicable to the proposed project.

### *Criterion 15300.2(a): Location*

- 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 in all 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 project does not qualify for an exception under Classes 3, 4, 5, 6 or 11. The project is located within an urban developed area and is not located within a sensitive environment. In addition, the project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(a) does not apply to the project.

#### *Criterion 15300.2(b): Cumulative Impact*

- 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.*

A cumulative impact from several projects is the change in the environment that results from the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable probable future projects (*State CEQA Guidelines* Section 15355(b)). Related projects considered to have the potential of creating a cumulative impact in association with the proposed project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the proposed project.

The proposed project would not result in any long-term or growth-inducing impacts that would be cumulatively considerable when viewed in conjunction with any subsequent projects in the same location. No permanent or long-term effects, such as loss of wetlands or other sensitive natural communities, take of special-status species, significant increase in vehicle trips, or creation of stationary sources of air and noise emissions, would occur as part of the proposed project. Furthermore, the effects of the proposed project would generally be beneficial, as the proposed project would provide pedestrian, bicyclist and transit improvements to serve the local community. Proposed improvements would be installed within existing public right-of-way and on City-owned property, which is currently in use for the purpose of recreation and multi-modal transportation (e.g., trails and park). No other projects are anticipated to occur in the immediate area of the proposed project at the same time. Therefore, the project's contributions to potential cumulative impacts would not be cumulatively considerable, and the exception under *State CEQA Guidelines* Section 15300.2(b) does not apply to the proposed project.

#### *Criterion 15300.2(c): Significant Effects*

- 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.*

No unusual circumstances have been identified in or around the project site that would result in significant environmental impacts. The proposed project would include the construction of pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. The construction methods that would be utilized as part of the proposed project are typical for a project of this type, and no specialized equipment or methods would be required to complete construction. Therefore, the proposed project would not include any unusual circumstances that would have a significant effect on the environment, as further demonstrated below.

Based on field reviews of the project site and review of the pertinent literature, as described below, the potential for significant adverse environmental impacts as defined under CEQA is negligible. With the implementation of standard regulatory compliance measures, there would be no

significant environmental impacts under CEQA. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(c) does not apply to the proposed project.

**Aesthetics.** No scenic vistas are identified in the City of San Rafael General Plan 2040<sup>1</sup> to or from the project site. Limited scenic vistas are possible from the majority of the project sites due to the relatively flat topography and the surrounding urban development; however, views of the San Francisco Bay are visible from several public vantage points, including the San Francisco Bay Trail and Pickleweed Park. Visible elements of the project would include curb ramp upgrades, wider sidewalks, crosswalk enhancements, transit shelter enhancements, bicycle boulevard treatments, and a new transit shelter. Proposed improvements would largely be at-grade and would not include tall structures or landscaping that might obscure views of the San Francisco Bay. Due to their relatively small scale, proposed improvements would not result in substantial adverse effects to scenic vistas.

As further described below under the discussion of Criterion 15300.2(d), Scenic Highway, no scenic highways are located in the vicinity of the project site.

Existing streetlights within the project area provide nighttime lighting and this lighting would remain on site. As described above, proposed lighting improvements would include 186 bollard-style light fixtures. These bollards may have lighting; however, bollards would be low to the ground and would not contribute light or glare that would spillover onto adjacent properties. In addition, 42 16-foot-tall overhead light fixtures would be installed. These lights would be low-level, shielded light fixtures, which would direct the light downward onto the existing pathways. Such lighting would be consistent with existing lighting in the project area and would not create a new source of substantial light or glare that would adversely affect day or nighttime views. All temporary construction-related sources of light or glare (i.e., construction equipment headlights/safety lights) would cease following completion of construction.

Therefore, the proposed project would not impact scenic views or scenic resources, degrade the existing visual character or quality of the project site, or create a new source of substantial light or glare.

**Agriculture and Forestry Resources.** The project site is located within an urbanized setting in the City of San Rafael and no agriculture or forestry resources currently occupy the site. According to the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP), the project site is designated as Urban and Built-Up Land<sup>2</sup>. The project site is not zoned for agricultural uses, nor is it under a Williamson Act contract. Therefore, no impacts to agriculture and forestry resources would occur with implementation of the proposed project.

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<sup>1</sup> City of San Rafael, 2021. City of San Rafael General Plan 2040. August 2. Available online at: <https://www.cityofsanrafael.org/gp-2040-document-library/> (Accessed February 20, 2026).

<sup>2</sup> California Department of Conservation, n.d. Division of Land Use Resource Protection, California Important Farmland Finder. Website: [maps.conservation.ca.gov/DLRP/CIFF](https://maps.conservation.ca.gov/DLRP/CIFF) (accessed February 20, 2026).

**Air Quality.** During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO<sub>x</sub>), directly emitted particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), and toxic air contaminants (TACs) such as diesel exhaust particulate matter. The Bay Area Air District requires the implementation of Basic Construction Mitigation Measures, provided below, to reduce construction dust impacts and emissions to a less than significant level whether or not construction-related emission exceed applicable thresholds. The City implements these measures for applicable construction activities.

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Long-term air pollutant emissions are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity), and area sources (e.g., landscape maintenance equipment use) related to the proposed project. As discussed above, the proposed project would improve bicycle, pedestrian, and transit infrastructure within the Canal neighborhood. The project would not

increase the capacity of existing roadways, but would enhance opportunities for multi-modal transportation and increase connectivity within the neighborhood. Therefore, the project would not result in a significant increase in the generation of vehicle trips that would increase air pollutant emissions. The project would result in low levels of off-site emissions due to energy generation associated with lighting along the pathway. However, these emissions would be minimal and would not exceed the pollutant thresholds established by the Air District. Therefore, the proposed project would not be a significant source of operational emissions.

Since the proposed project would not result in significant construction- or operation-related air quality impacts, the proposed project would not conflict with applicable air quality plans and would not expose sensitive receptors to substantial pollutant concentrations. In addition, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, the proposed project would not result in short- or long-term air quality impacts.

**Biological Resources.** The land within the project boundaries is primarily developed with buildings, roads, and sidewalks with some landscaped areas along the sidewalks and trail system. The landscaping of ornamental trees and shrubs provides habitat for urban-adapted species including American crow (*Corvus brachyrhynchos*), California scrub jay (*Aphelocoma californica*), northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), and eastern fox squirrel (*Sciurus niger*) among others. The eastern portion of the project area, which abuts San Rafael Creek and San Francisco Bay, contains salt marshes with pickleweed (*Salicornia pacifica*), saltgrass (*Distichlis spicata*), alkali heath (*Frankenia salina*), marsh gumplant (*Grindelia stricta* var. *angustifolia*), fat hen (*Atriplex prostrata*), and cord grass (*Sporobolus* spp.). The salt marshes provide suitable habitat for special-status wildlife species, including salt marsh harvest mouse, California black rail, and California Ridgway's rail.

An additional vegetation community present along the eastern portion of the site is ruderal grassland with semi-natural landscaping. This vegetation type consists of mainly non-native herbaceous plants and ornamental shrubs and trees that can withstand high frequency disturbances, including foot-traffic, bicycles, and trash. The plants in this area include wild oats (*Avena* spp.), Italian ryegrass (*Festuca perennis*), fennel (*Foeniculum vulgare*), short pod mustard (*Hirschfeldia incana*), and stork's-bill (*Erodium* spp.) among others.

The southeastern extent of the project area contains many California ground squirrel (*Otospermophilus beecheyi*) burrow, which in addition to the rock rip-rap along the bay side of the trail may provide suitable burrowing habitat for burrowing owl. No CNDDDB occurrences of burrowing owl have been recorded at the project site, but CNDDDB records and eBird observations in the vicinity have been winter observations, implying that burrowing owls winter, but do not breed in the region.

All of the proposed project improvements would occur within existing disturbed area. No direct impacts to special-status species, sensitive natural communities or wetland areas are anticipated as all work would occur in upland and previously disturbed areas. No in-water work would be required. Implementation of best management practices would ensure that temporary, indirect effects on

wildlife associated with project construction would be reduced to less than significant. Prior to project construction, the City would be required to obtain a permit from BCDC and to comply with all permit conditions.

**Cultural Resources.** Please refer to the discussion under Criterion 15300.2(f), Historical Resources. No cultural resources or human remains have been identified within or adjacent to the project site. Implementation of standard contract specifications would ensure that undiscovered resources are not adversely affected. Therefore, the proposed project would not cause an adverse change in the significance of a historical or archaeological resource.

**Energy.** Construction of the proposed project would require the use of energy to fuel grading vehicles, trucks, and other construction vehicles. All or most of this energy would be derived from non-renewable resources. In order to increase energy efficiency on the site during project construction, the project would restrict equipment idling times to 5 minutes or less and would require construction workers to shut off idle equipment, as required by the BAAQMD's Basic Construction Mitigation Measures. In addition, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be less than significant.

Typically, energy consumption is associated with fuel used for vehicle trips and natural gas and energy use. However, the proposed project would result in the construction of bicycle, pedestrian and transit improvement within existing public right-of-way and on City-owned trails and pathways. Additionally, operation of the proposed project would not require the consumption of natural gas. The nature of proposed improvements would not require substantial amounts of energy for either construction or maintenance purposes. Therefore, the proposed project would not use non-renewable resources in a wasteful or inefficient manner. Furthermore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or for addressing energy efficiency.

**Geology and Soils.** The project site, like most of California, would be subject to seismic ground shaking in the event of an earthquake. According to the City's General Plan, the project site is not located on an Alquist-Priolo Earthquake Fault Zone and the nearest active fault, the San Andreas Fault, is located approximately 10 miles west of the project site.

The project site is generally level and consists primarily of impervious surfaces associated with the existing roadways, sidewalks, and trails. No habitable structures would be constructed as part of the proposed project; however, proposed improvements could be at risk from seismic-related ground failure. The proposed project would be designed and constructed consistent with the most current earthquake resistance standards for Seismic Zone 4 in the California Building Code, which includes specifications for site preparation. Compliance with California Building Code requirements would ensure that impacts associated with liquefaction would be less than significant. Based on the

analysis provided above, the proposed project would not result in impacts related to geology and soils.

**Greenhouse Gas Emissions** Construction activities, such as site preparation, excavation and grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting construction crew, would produce combustion emissions from various sources. However, due to the small area of disturbance and limited number of project components, greenhouse gas (GHG) emissions during construction would be negligible. In addition, operation of the proposed project would generate minimal GHG emissions associated with electricity for proposed lighting improvements, and activities such routine maintenance. However, these emissions would be minimal and would not exceed thresholds established by Air District. As such, the proposed project would not generate substantial GHG emissions that may have a significant impact on the environment and would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

**Hazards and Hazardous Materials.** Please refer to the discussion below under Criterion 15300.2(e), Hazardous Waste Sites.

**Hydrology and Water Quality.** Construction activities are subject to the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Order No. 2022-0057-DWQ, NPDES No. CAS000002.<sup>3</sup> Any construction activity, including grading, that would result in the disturbance of 1 acre or more would require compliance with SWRCB's Construction General Permit. In addition, preparation of an Erosion and Sediment Control Plan (ESCP) and implementation of construction BMPs would be required in compliance with Sections 9.30.140, Construction-phase Best Management Practices and 9.30.150, Erosion and Sediment Control Plan Requirements, of the City of San Rafael Municipal Code. Additionally, proposed improvements would not substantially alter the existing drainage pattern of the project site or area, and the resulting increase in storm water runoff associated with implementation of the proposed project would be minimal. The proposed project would not substantially increase the rate or amount of surface runoff from the project site or substantially change the quality of stormwater runoff. Therefore, the proposed project would not result in significant water quality impacts.

**Land Use and Planning.** The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. Therefore, the proposed project would not physically divide an established community. The proposed project would be consistent with the City's General Plan Circulation Element related to roadway safety and vehicle and bicycle access within the City and does not propose or require any changes to the land use or zoning designations of the project site. Therefore, the proposed project would have no impact associated with land use and planning.

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<sup>3</sup> NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002)

**Mineral Resources.** Given the location of the City of San Rafael in the urbanized context of the San Francisco Bay Area and the lack of mineral resources in the area, the proposed project would not affect any known mineral resources, the proposed project would not impact mineral resources.

**Noise.** Construction of the proposed project would include the use of paving machines and rollers to repave asphalt and trucks to haul materials from the site. Ground-borne vibration associated with project construction activities could be perceptible; however, these levels would not be substantial. Construction noise is permitted by the City when activities occur between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday and between the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. Construction activity is not allowed on Sundays and holidays. Construction of the proposed project would be restricted to the daytime hours as allowed by the City Municipal Code. Therefore, the proposed project would have no construction-related noise impact.

The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. Operation of proposed improvements would not result in exposure of persons to increased noise levels since the project is not expected to generate an increase in vehicular traffic or other operational noise. Therefore, the proposed project would not expose persons to noise levels in excess of local standards.

**Population and Housing.** The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. The project would not construct additional major infrastructure so as to encourage population growth or new development within the immediate area or the City. The project does not include new development or uses and would therefore not induce substantial population growth in the project area either directly or indirectly. Therefore, the proposed project would not result in impacts to population and housing.

**Public Services.** The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood.. The proposed project improvements would not require additional public services (e.g., fire protection, police protection, schools, or parks) beyond what currently exists. Therefore, the proposed project would not result in impacts to public services.

**Recreation.** The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. Construction of proposed improvements could increase the use of bike lanes, sidewalks and trails within the project area, but it is not anticipated that this slight increase in use would result in physical deterioration of existing bicycle or pedestrian facilities. Implementation of the proposed project is intended to enhance these types of facilities and provide greater

connectivity within the Canal neighborhood. Therefore, the proposed project would not result in impacts associated with recreational facilities.

**Transportation.** The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. The proposed project would not add vehicular traffic to the street system, but instead would provide pedestrian, bicycle and transit improvements that could be used by non-motorized commuters. Therefore, the proposed project would not result in impacts related to transportation.

**Tribal Cultural Resources.** As discussed under Criterion 15300.2(f): Historic Resources below, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines*. In addition, given the previous disturbance of the project site, the likelihood of encountering subsurface tribal cultural resources during ground-disturbing activities is low. Furthermore, Assembly Bill (AB) 52 consultation is not required for categorically exempt projects. Therefore, impacts to tribal cultural resources would not occur.

**Utilities and Service Systems.** The proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. The proposed project would not require water or wastewater treatment as no potable water and/or toilets would be provided as part of the proposed project.

Existing storm drain facilities would be maintained as part of the proposed project. As described above, inlets or other means would be provided, where needed, to convey stormwater into the existing storm drain system, drainage ditches, and/or detention basins with minimal alteration to existing drainage patterns.

The minimal quantities of construction waste and solid waste generated during construction of the proposed project would be collected and disposed of at off-site landfills that have adequate capacity to serve the project. Operation of the project would not generate solid waste.

Given the nature of the proposed project, demand for water, wastewater treatment, storm water drainage, electricity, and solid waste disposal would be negligible. Therefore, the proposed project would have no impact on utilities or service systems.

**Wildfire Hazard.** The proposed project site is located within a developed urban area and consists of pedestrian, lighting, bicycle, and transit enhancements on 19 streets and pathways within the Canal neighborhood. The project site is not located within any State responsibility areas (SRA) for fire

service and is not within a very high fire hazard severity zone.<sup>4</sup> Further, proposed improvements are consistent with existing use of the public roads and trails and surrounding urban development. Therefore, the proposed project would not exacerbate wildfire risks, impair an adopted emergency response plan or evacuation plan, expose people or structures to significant risks from wildlife, or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

**Conclusion.** As described above, the proposed project would not result in a significant effect on the environment due to unusual circumstances. Therefore, the exception under *State CEQA Guidelines* Section 15300.2(c) does not apply to the proposed project.

*Criterion 15300.2(d): Scenic Highway*

- d. 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. This criterion does not apply to improvements required as mitigation by an adopted Negative Declaration or certified EIR.*

The project site is not within view of an officially designated State scenic highway.<sup>5</sup> Therefore, no scenic resources within view of a State Scenic Highway would be altered as part of the proposed project, and the exception under *State CEQA Guidelines* Section 15300.2(d) does not apply to the proposed project.

*Criterion 15300.2(e): Hazardous Waste Sites*

- e. 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.*

Proposed improvements would be located within public rights-of-way and on City-owned property (e.g., San Francisco Bay Trail, Pickleweed Park, and Bhatia Vista Trail). The project site does not include any active storage sites listed on the State Water Resources Control Board (SWRCB) Leaking Underground Storage (LUST) database<sup>6</sup> or the California Department of Toxic Substances Control

<sup>4</sup> California Department of Forestry and Fire Protection. n.d. Fire Hazard Severity Zone Viewer. Website: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/> (accessed February 20, 2026).

<sup>5</sup> California Department of Transportation. n.d. California Scenic Highway System Map. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa> (accessed February 20, 2026).

<sup>6</sup> State Water Resources Control Board. n.d. GeoTracker. Website: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Pickleweed+park%2C+San+Rafael%2C+Ca> (accessed February 20, 2026).

(DTSC) site cleanup program,<sup>7</sup> two of the component databases of the State's Hazardous Waste and Substances Site List (Cortese List) of known hazardous materials compiled pursuant to Government Code Section 65962.5. According the State Water Resources Control Board (SWRCB) Geotracker website,<sup>8</sup> there are several Leaking Underground Storage Tank (LUST) and Cleanup Program sites in the Canal neighborhood. All of these sites are identified closed. Therefore, no impacts associated with locating a project on a site included on a list of hazardous materials would occur, and the exception under *State CEQA Guidelines* Section 15300.2(e) does not apply to the proposed project.

#### *Criterion 15300.2(f) Historic Resources*

- f. 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 proposed project would construct pedestrian, lighting, bicycle, and transit enhancements that include curb ramp upgrades, sidewalk gap closures, corridor lighting improvements, and uncontrolled crosswalk enhancements on 19 streets and pathways within the Canal neighborhood. All improvements would be constructed within previously disturbed and paved areas. Excavation on the project site would be limited to re-paving of existing facilities and installation of proposed improvements. Construction work would occur entirely within previously disturbed areas and therefore is not expected to unearth artifacts or resources during project construction. However, in the unlikely event that an archaeological resource is discovered, the City would implement the following standard condition of approval that is required of all ground-disturbing development projects within the City. Adherence to this condition of approval would ensure the proposed project would not result in a substantial adverse change in the significant of a historical resource.

- If prehistoric or historical archeological resources are found during construction activities, all activities would be redirected off site and a qualified archaeologist would be notified to assess the situation. The City of San Rafael, Marin County, and the qualified archaeologist would evaluate the significance of the deposit and make recommendations regarding the treatment of the deposit in accordance with local and State regulations. It is recommended that adverse effects to the find be avoided by project activities. If the deposit qualifies as a historical resource or unique archaeological resource, adverse effects on the deposit must be avoided, or such effects must be mitigated. Mitigation may consist of, but is not limited to, recovery and analysis of the archaeological deposit; recording the resource; preparing a report of findings; and the curation of recovered archaeological materials at an appropriate facility. Upon completion of the assessment, the archaeologist shall prepare a report documenting the methods and results and provide recommendations for the treatment of the archaeological deposits discovered. The report shall be submitted to the City of San Rafael and the Northwest Information Center.

<sup>7</sup> California Department of Toxic Substances Control. n.d. EnviroStor. Website: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Pickleweed+Park%2C+San+Rafael%2C+CA> (accessed February 20, 2026).

<sup>8</sup> State Water Resources Control Board. n.d. GeoTracker. Website: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Pickleweed+park%2C+San+Rafael%2C+Ca> (accessed February 20, 2026).

The potential to uncover human remains exists at locations throughout the Bay Area. Due to the existing urban nature of the area, it is not expected that the project would unearth artifacts or resources during project construction. However, if human remains are encountered during construction activities, the regulatory process outlined in Health and Safety Code Section 7050.5 must be followed, which involves coordination with the Native American Heritage Commission and a Native American Most Likely Descendant. Adherence to this code and PRC Section 097.98, which addresses the treatment of Native American human remains, means that the proposed project would not knowingly disturb human remains but would appropriately address any human remains should any be encountered during project work.

With compliance with applicable regulatory requirements, no substantial adverse change in the significance of a historical resource would occur from the proposed project; therefore, the exception under *State CEQA Guidelines* Section 15300.2(f) does not apply to the proposed project.

## SUMMARY

On the basis of the evidence provided above, the project is eligible for a Statutory Exemption in accordance with Public Resources Code Section 21080.25 and a Class 1 Categorical Exemption in accordance with Sections 15301, Existing Facilities, of the *State CEQA Guidelines*. Because the proposed project meets the criteria for the Statutory Exemption identified in Public Resources Code Section 21080.25 and for a Categorical Exemption under Section 15301 of the *State CEQA Guidelines*, it would not have a significant effect on the environment. Therefore, this analysis finds that a Notice of Exemption may be prepared for the project.