

Statement of Exemption

File No.	ER25-261
Location of Property	Caltrans bridge at SR 87 and Saint John Street/Almaden Boulevard and Caltrans bridge at SR 87 and Santa Clara Street
Project Description	The project comprises the installation of public art elements (e.g. lettering and murals) on existing Caltrans bridges in two Downtown locations. The project does not involve construction or ground disturbance activities.

Certification

Under the provisions of Sections 15301 of the State Guidelines for Implementation of the California Environmental Quality Act (CEQA) as stated below, this project is found to be exempt from the environmental review requirements of Title 21 of the San José Municipal Code, implementing the California Environmental Quality Act of 1970, as amended.

15301. Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, 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. The key consideration is whether the project involves negligible or no expansion of use.

Analysis

The City of San José and the San Jose Downtown Association are proposing Transportation and Community Identification Elements on the Caltrans bridge at Saint John Street/Almaden Boulevard ("Little Italy") and the Caltrans bridge at SR 87 and Santa Clara Street ("Santa Clara Street"). The bridges' underpasses are currently in aesthetic decline, including accumulated soot from past encampment fires and persistent graffiti, creating an environment dominated by a monotonous coloring of grays and tans that could be perceived as visually unwelcoming and unsafe. This project is intended to serve as a critical urban revitalization tool that enhances safety, reinforces community identity, and creates a welcoming corridor for the city's upcoming global spotlight.

The proposed installation of public art lettering and murals on Caltrans bridges constitute a minor modification to an existing facility as defined by the CEQA Guidelines. The construction and improvement activities will occur within the existing Caltrans right-of-way. The project does not involve construction or ground disturbance activities. The City would obtain encroachment permit(s) from Caltrans for the proposed work. In accordance with Caltrans' requirements, the City would prepare and implement a Water Pollution Control Plan to ensure that implementation of the project would not result in impacts to storm water runoff.

The attached analysis demonstrates that: a) none of the exceptions contained in Section 15300.2 of the CEQA Guidelines apply to the project and b) the project is consistent with the criteria in Section 15301 of the CEQA Guidelines. For these reasons, the proposed project is determined to be categorically exempt from CEQA under Section 15301.

Christopher Burton, Director
Planning, Building and Code Enforcement

Date January 28, 2026



Deputy

Attachment

- Environmental Analysis supporting the Categorical Exemption, prepared by David J. Powers & Associates Inc., dated January 28, 2026.



MEMORANDUM

Date	January 28, 2026
To	David Keyon, Principal Planner City of San José
From	Natalie Noyes, Senior Project Manager Shannon George, Principal Project Manager
Subject	Transportation and Community Identification Elements Project – CEQA Categorical Exemption Qualification

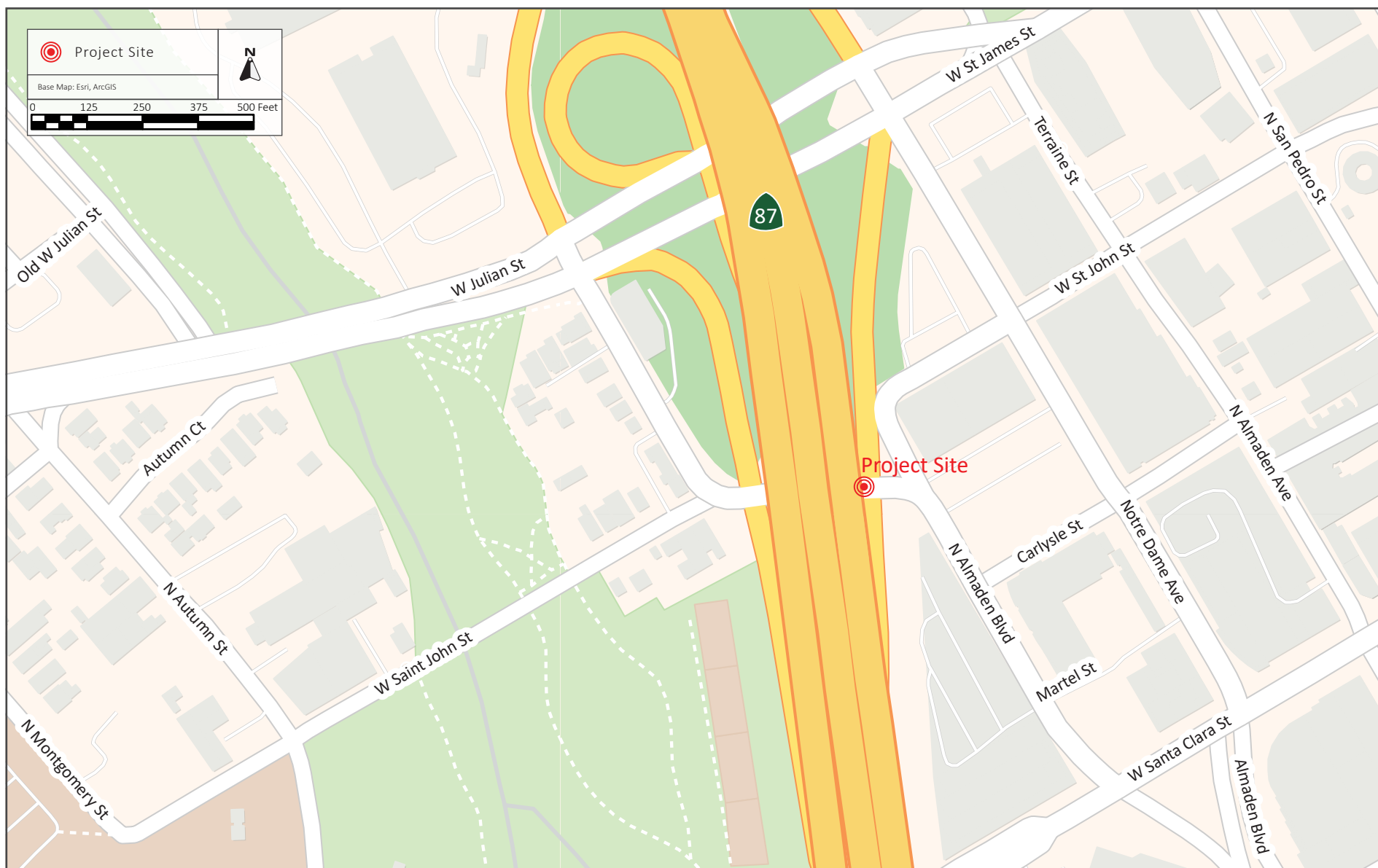
I. Introduction to Categorical Exemptions

The California Environmental Quality Act (CEQA) Guidelines contain classes of projects that have been determined not to have a significant effect on the environment and are, therefore, exempt from the provisions of CEQA. CEQA Guidelines Sections 15301 – 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met in order for a project to be found exempt, including CEQA Guidelines Section 15301 Existing Facilities (Class 1). CEQA Guidelines Section 15300.2 includes a list of exceptions to exemptions, none of which may apply to a project in order for it to qualify for a categorical exemption (i.e., if an exception applies, a project is precluded from being found categorically exempt).

The City of San José, serving as the Lead Agency, is completing environmental review for the proposed Transportation and Community Identification Elements project (“project”) in compliance with CEQA, the CEQA Guidelines (California Code of Regulations Section 15000 et. seq.), and the regulations and policies of the City of José. This Memorandum describes the proposed project and provides analysis and evidence to support a determination by the City of San José that the project would be eligible for a Categorical Exemption under CEQA.

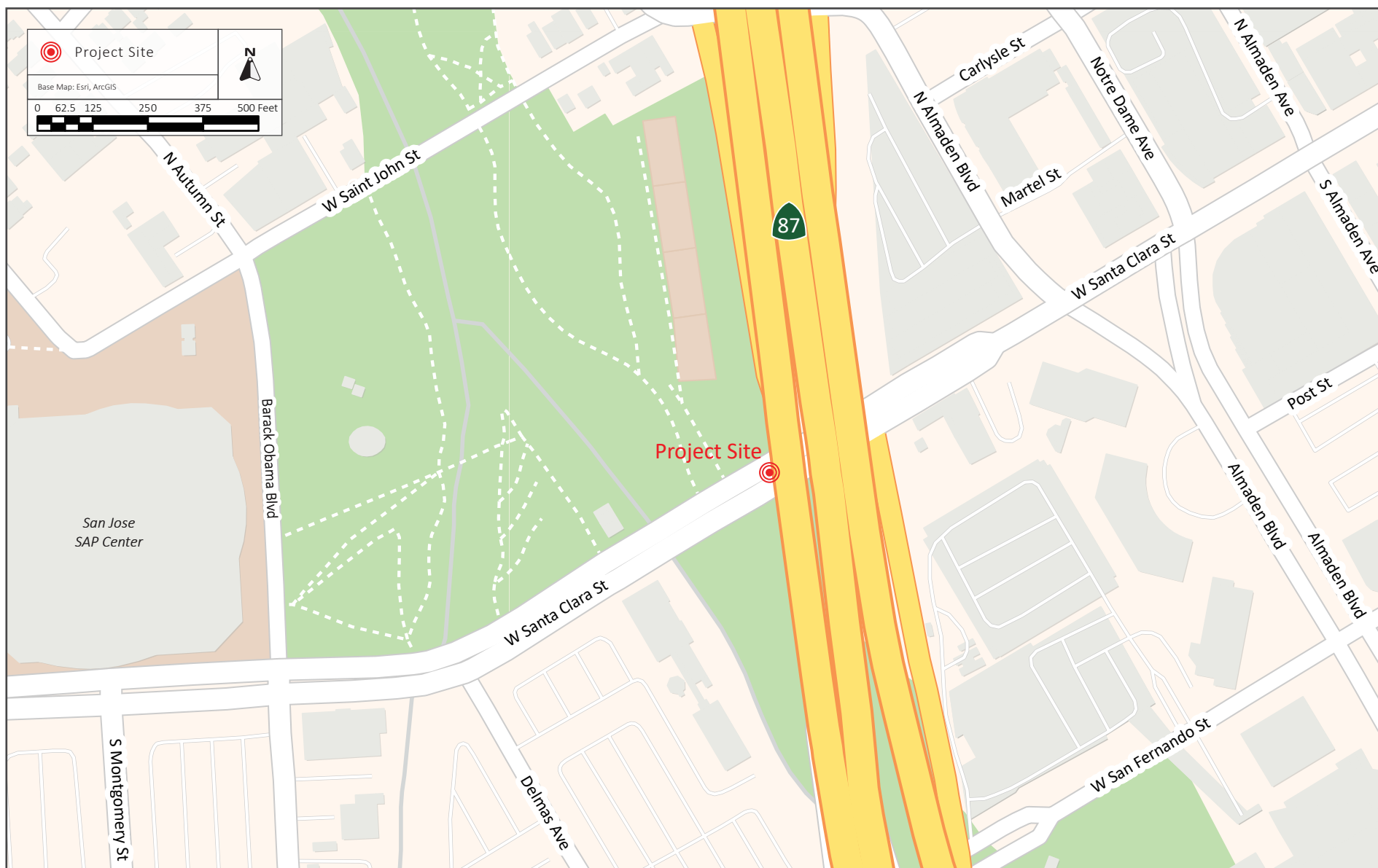
II. Existing Conditions

The project is proposed at two California Department of Transportation (Caltrans) bridges at State Route 87 (Highway 87) in downtown San José, as shown in Figure 1 and Figure 2 and described below.



PROJECT LOCATION

FIGURE 1



PROJECT LOCATION

FIGURE 2

Little Italy Location

The Little Italy site is located at the Caltrans bridges (37-0312 and 37-0312G) at Highway 87 and St. John Street/Almaden Boulevard.

There are several trees located on both sides of the sloped embankment of the eastbound bridge's eastern façade. The Guadalupe River is approximately 475 feet to the west of the project site.

Santa Clara Street Location

The Santa Clara Street site is located at the Caltrans bridges at Highway 87 and Santa Clara Street.

There are several trees located on both sides of the bridge, as well as along the Guadalupe River trail. The Guadalupe River is immediately adjacent to the project site.

III. Project Description

The City of San José and the San Jose Downtown Association (SJDA) are proposing Transportation and Community Identification (TCI) Elements on Caltrans bridges 37-0312 and 37-0312G ("Little Italy") and the Caltrans bridge at Highway 87 and Santa Clara Street ("Santa Clara Street").

The project is part of the larger "Stitching Districts" plan, designed to activate the Downtown core in preparation for major international events like the FIFA World Cup, Super Bowl LX, and NCAA March Madness. The underpass is currently in aesthetic decline, including accumulated soot from past encampment fires and persistent graffiti, creating an environment dominated by a monotonous coloring of grays and tans that could be perceived as visually unwelcoming and unsafe. By introducing color, cultural symbolism, and high-quality artistry, the project applies core principles of Crime Prevention Through Environmental Design with the intent to reclaim the blighted space, foster natural surveillance by creating an engaging destination, and improve the pedestrian experience. This project is intended to serve as a critical urban revitalization tool that enhances safety, reinforces community identity, and creates a welcoming corridor for the city's upcoming global spotlight.

The project does not involve construction or ground disturbance activities. The project will require encroachment permit(s) from Caltrans. In accordance with Caltrans' requirements, the City would prepare and implement a Water Pollution Control Plan (WPCP) to ensure that implementation of the project would not result in impacts to storm water runoff.



PROPOSED EASTERN BRIDGE FAÇADE MURAL

FIGURE 3

Little Italy

The TCI elements will feature “Little Italy” lettering and depiction of Italy’s outline in green, white, and red on the east sidewall façade of the eastbound bridge, as shown in Figure 3. A mural of water, gondoliers, and a shark will be painted on the embankments below the under pass, acknowledging both the neighborhood's cultural identity and proximity to the SAP Center (refer to Figure 4).

The Little Italy mural would be installed over a period of approximately five days between the hours of 8:00 a.m. and 6:00 p.m. The installation of the murals would require the use of a box truck with power washing equipment, scissor lift, small utility pumps, and PIG socks and temporary sewer dams. If no water access is available on-site, City fire hydrants will be used to access water (requiring a hose to run from the hydrant to truck). Single-lane road closures would be required along eastbound and westbound St. John Street at N. Almaden Boulevard during the five-day installation period. The project would utilize professional-grade, durable coatings suitable for exterior concrete surfaces to ensure longevity and compliance with Caltrans standards.

Santa Clara Street

The TCI elements would feature “Welcome to San Jose” lettering on the west facing bridge sidewall and a colorful mural design on three bridge piers along the Guadalupe River trail, south of Santa Clara Street as shown on Figures 5 and 6.

The Santa Clara Street murals would be installed over a period of approximately 11 days between the hours of 8:00 a.m. and 6:00 p.m. The installation of the murals would require the use of a box truck with power washing equipment, scissor lift, small utility pumps, and PIG socks and temporary sewer dams. If no water access is available on-site, City fire hydrants would be used to access water (requiring a hose to run from the hydrant to truck). Single-lane road closures along eastbound and westbound W. Santa Clara Street at Highway 87 (between Delmas Avenue and N. Almaden Boulevard) would be required during the 11-day installation period. The project would utilize professional-grade, durable coatings suitable for exterior concrete surfaces to ensure longevity and compliance with Caltrans standards.

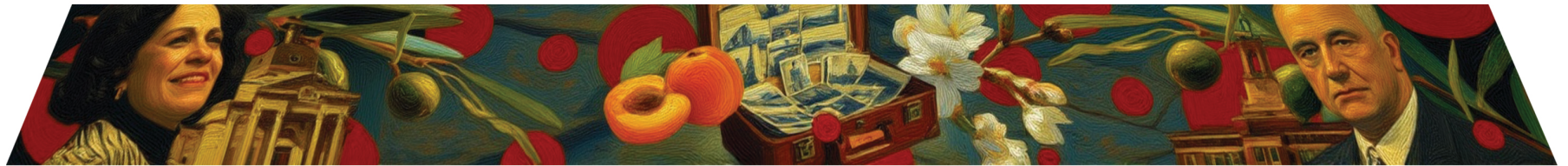


LITTLE ITALY COLOR RENDERING.



SOUTH BOUND WALL

Italian



NORTH BOUND WALL

Italian-American

0 Ft.

235 Ft.

Source: Roberto Romo

PROPOSED UNDER PASS MURAL

FIGURE 4

75' 0"

WELCOME TO DOWNTOWN SJ



Welcome to Downtown
Scale: 3/16"=1'



Source: Caltrans, August 2023



Source: Caltrans, August 2023

PROPOSED BRIDGE PIER MURALS

FIGURE 6

IV. Analysis of Eligibility for Categorical Exemption

Section 21084 of the Public Resources Code requires the CEQA Guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment, and which shall, therefore, be exempt from the provisions of CEQA. Several classes of projects have been declared to be categorically exempt from the preparation of environmental documents (CEQA Guidelines Section 15300).

A project is eligible for a Categorical Exemption if it: (1) meets the criteria of one of the identified classes and (2) does not meet any of the exceptions to a Categorical Exemption identified in CEQA Guidelines Section 15300.2. This two-part analysis is provided below.

Part 1: Categorical Exemption Class Criteria Findings

The project qualifies under Class 1, as discussed below.

Class 1 – CEQA Guidelines Sections 15301 Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, 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. The key consideration is whether the project involves negligible or no expansion of use. Examples include, but are not limited to, interior or exterior alterations; restoration or rehabilitation of deteriorated or damaged structures to meet current public health and safety standards; or existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety), and other alterations such as the addition of bicycle facilities.

The project meets the criteria for a Class 1 exemption because it includes minor alterations (i.e., painting murals) of an existing public facility (i.e., existing Caltrans bridges and embankments). No construction or ground disturbance activities are anticipated or proposed. The project involves no expansion of use.

Part 2: Categorical Exemptions Exceptions Findings

The purpose of this section is to document whether any of the exceptions listed in CEQA Guidelines Section 15300.2 apply to the project.

(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 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.

This exception only applies to Class 3, 4, 5, 6, and 11 exemptions. The proposed project is categorically exempt under Class 1; therefore, this exception is not applicable to the project under CEQA Guidelines Section 15300.2(a).

(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.

For this analysis, cumulative impacts are considered for successive projects that modify an existing Caltrans roadway in Downtown San José (as they are the same project type as the proposed project) in the same geographic area. There are no other projects in the vicinity that would modify a Caltrans roadway in Downtown San José. While the proposed project is part of a larger effort to revitalize San José's Downtown, most of the other mural projects identified by the City have already been implemented along Santa Clara Street, between Market and Fourth Street. None of these murals involved Caltrans' facilities along Highway 87.

(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 and project site do not contain any features that are unique or unusual for a highway over pass/under crossing. The project involves the painting of murals on an existing Caltrans bridge and under pass. No construction or ground disturbance activities are anticipated or proposed. In addition, an analysis of environmental factors where unusual circumstances (unique to the project) could be identified is included below. These environmental factors include air quality, biological resources, water quality and transportation and traffic.

Air Quality

The project does not involve construction or ground disturbance and would, therefore, not result in any construction air quality impacts. Paint from outdoor murals has the potential to impact air quality through the release of volatile organic compounds (VOCs) during application, drying, and the shedding of particles as the paint weathers. The project will utilize professional-grade, durable coatings suitable for exterior concrete surfaces to ensure longevity and compliance with Caltrans standards. In addition, the paint would be required to meet relevant air quality standards (i.e., CARB and the Bay Area Air District).

Biological Resources

Little Italy

The project site is located in an urbanized area of downtown San José. Habitats primarily associated with Bay Area special-status species, such as riparian, wetland, salt marsh, freshwater marsh, and serpentine grassland habitats, are not present on-site. The nearest natural area to the project site is the Guadalupe River riparian area which contains mixed riparian forest, aquatic, and shaded

riparian aquatic habitats. The project site is located approximately 475 feet west of the Guadalupe River. The primary biological resources on the site are landscape and volunteer trees along the freeway. The project does not propose to remove any trees; however, installation of the bridge mural would involve the use of equipment, such as a lift, that could disturb nesting birds (if present).

Santa Clara Street

The project site is located in an urbanized area of downtown San José. Habitats primarily associated with Bay Area special-status species, such as riparian, wetland, salt marsh, freshwater marsh, and serpentine grassland habitats, are not present on-site. The nearest natural area to the project site is the Guadalupe River riparian area which contains mixed riparian forest, aquatic, and shaded riparian aquatic habitats. The project site is located adjacent to the Guadalupe River. The section of Guadalupe River adjacent to the site is, however, channelized and terraced for flood control with minimal vegetation consisting of a limited number of trees that are not contiguous with the dense riparian habitats to the north and south. No equipment would be located within the riparian corridor. The primary biological resources on the site are landscape and volunteer trees along the freeway. The project does not include the removal of those trees and therefore would not result in any direct impacts to these resources.

Water Quality

The mural installation at the Santa Clara Street location would require that the boom extend across the Guadalupe River in order to paint the pier across from the Guadalupe River trail. The boom would access the pier from the trail and would extend over the river. The project would use protective coverings on the ground to avoid any spills.

In accordance with Caltrans' requirements, the City would prepare and implement a Water Pollution Control Plan (WPCP) to ensure that implementation of the project would not result in impacts to storm water runoff. As part of the WPCP, the City would implement the following best management practices during construction and include these measures in all construction contracts and approved plans for the project:

- Paint/materials shall be stored away from storm drains and under cover
- Tarps/drop cloths shall be used to catch paint drips
- Nearby storm drains shall be covered during work
- Drip pans/tarps shall be placed under lift equipment
- All materials shall be stored and secured away from runoff areas
- A spill kit shall be available on-site
- On-site equipment washing shall be prohibited
- Waste shall be cleaned and removed daily
- Painting shall be scheduled during dry weather only

With the implementation of the WPCP, the project would not result in significant water quality effects.

Transportation and Traffic

As described in Section III. Project Description, the project would be implemented over a period of five to 11 days and would require single-lane road closures for the duration. The City will implement a traffic control plan to ensure the safe and efficient movement of vehicles, bicycles, and pedestrians.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

There are no officially designated state scenic highways in the project area. The nearest officially designated eligible state scenic highway is Interstate 280, which is located approximately 2.7 miles southwest of the project site and is not visible from the project site.¹ The project, therefore, would not damage scenic resources within a highway officially designated as a state scenic highway, and no exception to the exemption applies under 15300.2(d).

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

The project site is not included on any lists compiled pursuant to Section 65962.5 of the Government Code; therefore, no exception to the exemption applies under 15300.2.²

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

The Caltrans bridges are not listed on the California Register of Historic Resources or San Jose's local register and would not be considered a historical resource pursuant to CEQA Guidelines Section 15064.5. Therefore, the project would not cause a substantial change in the significance of a historical resource.

V. Conclusion

¹ California Department of Transportation. "California State Scenic Highway System Map". Accessed October 6, 2025. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

² California Environmental Protection Agency. "Cortese List Data Resources". Accessed October 6, 2025. <https://calepa.ca.gov/sitecleanup/corteselist/>.

As documented in Section IV. Analysis of Eligibility for Categorical Exemption, none of the exceptions contained in CEQA Guidelines Section 15300.2 apply to the project and the project is consistent with the criteria in CEQA Guidelines Section 15301. The project, therefore, qualifies as exempt from the provisions of CEQA under Class 1 of the CEQA Guidelines.