



CEQA CATEGORICAL EXEMPTION JUSTIFICATION MEMORANDUM

PREPARED FOR: Betsy Flores, City of Galt

PREPARED BY: Dewberry Engineers Inc.

DATE: June 10, 2026

SUBJECT: Kost Road Improvements at UPRR Crossing Project – California Environmental Quality Act Categorical Exemption Memorandum

1. Introduction

The City of Galt (City) proposes the Kost Road Improvements at the Union Pacific Railroad (UPRR) Crossing (proposed project). The purpose of the proposed project is to create a more livable environment for the residents of the area by providing for bicycle and pedestrian crossings where neither currently exist. The proposed project is needed to improve safety for all modes of travel (vehicle/pedestrian/bicycle) through this at-grade crossing and improve the crossing to current standards.

Under the California Environmental Quality Act (CEQA) the proposed project is considered exempt per CEQA Guidelines Article 19, Categorical Exemptions (CEs), Section 15301(c). The purpose of this memorandum is to document existing conditions and provide documentation to support the Notice of Exemption (NOE) under CEQA.

2. Project Location

The proposed project is located on Kost Road between Joy Drive/Wilder Way to the east and Maria Way to the west, in the City, in Sacramento County (County) (Attachment A, Figures 1 and 2). Kost Road crosses over the UPRR facility.

3. Project Description

The proposed project would provide continuity of the planned and existing road, bikeway, and pedestrian infrastructure. The proposed project would widen Kost Road at the UPRR right-of-way to provide room for Class II bicycle and Americans with Disabilities Act (ADA)-compliant pedestrian facilities. The proposed project would include the associated relocation and upgrade of railroad signal systems and improved roadway shoulders, curbs, drainage, lighting, signage, and striping. The proposed project would require ground disturbance of up to five feet in depth. The proposed project details are shown in Attachment A, Figure 3.

License easements would be needed on Assessor's Parcel Number (APN) 150-0101-082 and APN 150-0101-078 to construct the proposed improvements within the UPRR right-of-way (ROW). A partial ROW acquisition may also be required on APN 150-0101-086. License easements and the partial ROW acquisition would be performed in accordance with applicable Federal, State and local regulations, Caltrans Policies and Procedures, and the City's ROW Policies and Procedures (as applicable).

Lane closures along Kost Road may be required during construction. Construction crews would use construction signage and temporary delineations to ensure safe access through the project area. Access to roadways (Kost Road, Joy Drive, Wilder Way) and adjacent properties would be maintained throughout the proposed project construction.

4. Environmental Clearance

A Phase I Initial Site Assessment for the Kost Road Improvements at UPRR Crossing Project (Phase I ISA) and Historic Property Survey Report (HPSR), which includes the Archeological Survey Report (ASR) and Finding of Effect (FOE), were prepared for the proposed project (Dewberry, 2025a and 2025b).

4.1 Hazards and Hazardous Materials

The use of construction equipment could result in unanticipated oil or related fluid leaks; however, the handling of hazardous materials during construction activities would occur in accordance with applicable federal, state, and local law requirements. The Phase I ISA identified no hazardous materials sites directly associated with the project area (Dewberry, 2025a). The records review identified 5 sites within 0.5 miles of the project area; however, there is no known history of soil or groundwater contamination from the identified sites that would occur within the project area boundaries. According to the “General Location Map for Ultramafic Rocks”, the project area is not located within areas known to contain naturally occurring asbestos (NOA). The Phase I ISA concluded that no recognized environmental conditions (RECs), Polychlorinated Biphenyls (PCBs), asbestos containing material (ACM), or NOA are at or surrounding the proposed project area. Lead containing paint (LCP) and treated wood waste (TWW) could potentially be present at the project area because of the roadway striping and the UPRR facility, respectively.

The proposed project would follow regulatory compliance measures as outlined below in Section 6. No impacts associated with hazards and hazardous materials would occur with proposed project implementation.

4.2 Historic/Cultural Resources

Dewberry conducted a cultural resource investigation that included a records search conducted at the North Central Information Center (NCIC), archival and background research, Native American outreach and ongoing consultation, and pedestrian survey of the area of potential effect (APE).

No resources listed on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Inventory of Historical Resources (1976), or local registers are identified within the project area.

There is one recorded cultural resource mapped within the project area, the Western Pacific Railroad (P-34-1302), and one cultural resource mapped outside the project area but within a 0.25-mile radius, Cardoso Dairy (P-34-5445) (Dewberry, 2025b). The segment of P-34-1302 within the project area is considered eligible for inclusion in the NRHP and CRHR for purposes of this proposed project due to the size of this long linear resource and the limited potential for effects related to this proposed project. The segment that is being considered eligible for purposes if this proposed project has been documented as a continuation of both the Union

Pacific Railroad (P-34-000505) and the Central Pacific Railroad/Southern Pacific Railroad (P-34-001302) in Sacramento County. The Central Pacific Transcontinental Railroad is significant at the national level under Criterion A for its significance in transportation history, with a period of significance from 1869 until 1945, covering the period from when the transcontinental line was complete until the conclusion of the railroad's achievements in World War II. The proposed project would result in a No Adverse Effect on the P-34-1302. The City received the State Historic Preservation Officer's (SHPO's) concurrence of the finding of no adverse effect on June 8, 2026.

Dewberry sent consultation letters to 22 Native American tribes identified by the Native American Heritage Commission (NAHC). The Wilton Rancheria (Rancheria) – Cultural Preservation Department responded on March 17, 2025, requesting to formally open consultation on the proposed project. On August 14, 2025, a consultation meeting was held with the Rancheria, City, Caltrans, and Engineering/Environmental consulting team. A second consultation meeting was held with the Rancheria on October 30, 2025. During consultation, it was agreed that the City and the Wilton Rancheria would set up a stewardship monitoring agreement for proposed project construction.

Dewberry emailed the Galt Area Historical Society on March 7, 2025, to request the history of the railroad within the APE and to ask if the organization had any concerns about the proposed project. The Galt Area Historical Society responded on March 10, 2025, that they had no concerns about the proposed project because development did not occur in the area until the 1970s.

No pre-contact or historic archaeological resources were identified within the project area (Dewberry, 2025b). Furthermore, the project area was previously disturbed by the construction of the existing roadway and UPRR, making discovery of cultural resources during construction less likely. The proposed project would follow regulatory compliance measures as outlined below in Section 6. Historic/cultural resources would not be impacted by proposed project implementation.

5. California Environmental Quality Act (CEQA) Analysis

CEs under CEQA represent activities that generally do not result in significant environmental impacts. The Secretary of the Resource Agency has established a list of classes of projects, which have been determined not to have a significant effect on the environment and are therefore exempt from the provisions of CEQA, provided several exception criteria are met (CEQA Guidelines Section 15300-15333). The proposed project would be eligible as a CE under Class 1, Existing Facilities (Section 15301(c)). Class 1, Existing Facilities (Section 15301(c)), includes: repair/maintenance/minor alteration of 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, 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. The Exemption Discussion table presented below discusses and provides justification for CEQA compliance with exception criteria listed under CEQA Guidelines Section 15300.

TABLE 1: Exemption Discussion

EXEMPTION	DISCUSSION
(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.	The proposed project is exempt under Class 1. The proposed project would not fall under exempt class 3, 4, 5, 6, or 11.
(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 project is proposed by the City and is consistent with policies in the Galt General Plan. Furthermore, the City General Plan and City Bicycle Master Plan identify the sidewalk and bicycle improvements proposed by the project. The proposed project would provide continuity of the planned and existing road, bikeway, and pedestrian infrastructure. The proposed project is not growth inducing. During proposed project construction, construction crews would use construction signage and cones to ensure safe access throughout the construction area. Detours would not be needed during proposed project construction activities. There would be no negative cumulative impact due to the proposed project implementation.
(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 located in a largely built and disturbed environment. Impacts to biological resources would not occur. The proposed project is not within or adjacent to tribal land or a designated cultural or historic area. Additionally, the Galt Area Historical Society had no concerns about the proposed project. The proposed project would comply with all regulations and standard best management practices (BMPs), including the Regulatory Compliance Measures, as outlined below in Section 6. Furthermore, the City and the Wilton Rancheria would set up a stewardship monitoring agreement for proposed project construction. Significant effects on tribal, cultural, and historic resources would not occur.

TABLE 1: Exemption Discussion	
EXEMPTION	DISCUSSION
	As discussed above in Section 4.1, the proposed project would not result in impacts related to hazardous materials. The proposed project is not capacity increasing; therefore, noise levels during operations would be the same as existing conditions. Construction noise would be short-term, intermittent, and vary in intensity depending on the type of construction activity and the distance and shielding between the noise source and the receptor. The Galt Municipal Code of Ordinances Section 8.40.060, Exemptions, exempts noise related to City public works projects. The proposed project would comply with the City's Municipal Code. Furthermore, the proposed project would comply with the Caltrans Standard Specifications, Section 14-8.02, Noise Control. The proposed project would comply with all regulations and standard best management practices (BMPs), including the Regulatory Compliance Measures, as outlined below in Section 6. There are no unusual circumstances of concern involved with the proposed project.
(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 or eligible scenic highways near the proposed project (Caltrans, 2025). No impact would occur.
(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.	As a part of the Phase I ISA, a review of EnviroStor and GeoTracker identified no hazardous materials sites directly associated with the project area (Dewberry, 2025). The proposed project is not located on a listed hazardous materials site.
(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.	As discussed above in Section 4.2, it was determined that the proposed project would not cause a substantial adverse change to a historic resource.

6. Regulatory Compliance Measures

The following regulatory compliance measures will be included in bid packages and construction notices for implementation during construction.

6.1 Traffic Access Management Plan

Per Caltrans 2024 Standard Specifications Section (SSP) 12-4, Maintaining Traffic, the Contractor will prepare a Traffic Access Management Plan to maintain emergency ingress, egress, and daily traffic flows throughout the proposed project boundaries.

6.2 Unidentified Cultural Materials

Per Caltrans Exhibit 5.1 in Volume 2 of the Standard Environmental Reference, it is Caltrans' policy to avoid cultural resources whenever possible. Further investigations may be needed if the site[s] cannot be avoided by the project. If previously unidentified cultural materials are unearthed during construction, it is Caltrans' policy that work be halted in that area until a qualified archaeologist can assess the significance of the find. Additional archaeological surveys will be needed if project limits are extended beyond the present survey limits. Additionally, the City will enter into a stewardship monitoring agreement with the Wilton Rancheria.

6.3 Human Remains

If human remains are discovered during project activities, all activities in the vicinity of the find will be stopped and the County Sheriff-Coroner's Office shall be notified. If the coroner determines that the remains may be those of a Native American, the coroner will contact the NAHC. Treatment of the remains shall be conducted in accordance with further directions of the County Coroner or the NAHC, as appropriate.

6.4 Health and Safety Plans

In all operations connected with the project, the construction contractor will observe the provisions of the Worker's Compensation and Safety Laws of the State of California, Division V of the Labor Code, and will use all accepted and best safety practices for the public and contractor's employees. Additionally, the project will comply with Caltrans' SSP 14-11.02 Discovery of Unanticipated Asbestos and Hazardous Substances - Upon discovery of unanticipated asbestos or a hazardous substance, immediately stop working in the area of discovery and notify the Engineer if:

- 1) You reasonably believe the substance is asbestos as defined in Labor Code § 6501.7 or a hazardous substance as defined in Health & Safety Code § 25316 and § 25317.
- 2) Its presence is not described in the Contract.
- 3) The substance has not been made harmless.

6.5 Lead Based Paint (LBP)

If the presence of LBP is detected in the paint samples during the standard construction Lead Survey, the following will be implemented.

- Building materials associated with paint on structures, and paint on utilities will be abated by a California licensed abatement contractor and disposed of as hazardous waste in compliance with SSP 14-11.13 and other federal and state regulations for hazardous waste.

- A Lead Compliance Plan will be prepared by the contractor for the disposal of LBP. The grindings (which consist of the roadway material and the yellow and white color traffic stripes) will be removed and disposed of in accordance with Standard Special Provision 36-4 (Residue Containing High Lead Concentration Paints). In addition, the Lead Compliance Plan will also contain the following provision to address aerially deposited lead: SSP 7-1.02K (6)(j)(iii) – Earth Material Containing Lead
- A California state licensed lead contractor will be required to perform all work that will disturb any LBP as a result of planned or unplanned renovations in the project area, including the presence of yellow traffic striping and pavement markings that may contain LBP. All such material must be removed and disposed of as hazardous material in compliance with SSP 14-11.12.

6.6 Treated Wood

In August 2021, Assembly Bill 332 (AB332) was signed by Governor Newsom, to reinstate Alternative Management Standards (AMS), therefore simplifying and facilitating the safe and economical disposal of treated wood waste (TWW). TWW may be disposed in either a class I hazardous waste landfill or a composite-lined portion of a solid waste landfill unit that meets all requirements applicable to disposal of municipal solid waste in California and that is regulated by waste discharge requirements issued for discharges of designated waste or TWW. TWW may not be disposed of in a composting facility or a transformation facility. The State Water Resources Control Board (SWRCB) as a list of disposal facilities authorized to accept TWW. Therefore, the following action is recommended during the PS&E phase:

- Any treated wood found during project construction will be removed and disposed of at a landfill facility authorized to accept TWW by the SWRCB.

6.7 Equipment (Noise) Control

In order to comply with the City's Municipal Code and Caltrans SSP 14-8.02, Noise Control, the project will comply with the following:

- Use newer equipment with improved muffling and ensure that all equipment items have the manufacturers' recommended noise abatement measures (such as mufflers, engine enclosures, and engine vibration isolators intact and operational). Newer equipment will generally be quieter in operation than older equipment. All construction equipment should be inspected at periodic intervals to ensure proper maintenance and the presence of noise control devices (e.g., mufflers and shrouding).
- Utilize construction methods or equipment that will provide the lowest level of noise and ground vibration impact.
- Turn off idling equipment after no more than five minutes.
- Plan noisier operations during times of least sensitivity to receivers (daytime, weekday hours), specifically do not exceed 86 dBA Lmax at 50 feet from the job site from 9:00 p.m. to 6:00 a.m.
- Keep noise levels relatively uniform and avoid impulsive noises.

6.8 Hours of Construction

Construction activities will be limited to 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturday, and 10:00 a.m. to 3:00p.m. on Sunday and federal holidays per the City Code 8.20.040, Construction Noise.

7. Determination

In accordance with CEQA, each public agency shall, in the course of establishing its own procedures, list those specific activities which fall within each of the exempt classes, subject to the qualification that these lists must be consistent with both the letter and the intent expressed in the classes.

Based on a review of the project site, CEQA Guidelines, and the analysis above, the project would meet the requirements of a CEQA CE under Class 1, Existing Facilities (Section 15301(c)).

8. References

California Department of Transportation (Caltrans). 2025. California State Scenic Highway System Map. Available Online:
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Date Accessed: January 15, 2025.

Caltrans. 2024. Standard Specifications. Available Online:
<https://dot.ca.gov/programs/design/october-2024-ccs-standard-plans-and-standard-specifications>. Date Accessed: January 15, 2025.

Department of Toxic Substances Control (DTSC). 2025. EnviroStor. Available Online:
<https://www.envirostor.dtsc.ca.gov/public/>. Date Accessed: January 15, 2025.

Dewberry. 2025a. Phase I Initial Site Assessment for the Kost Road Improvements at UPRR Crossing Project.

Dewberry. 2025b. Historical Property Survey Report (HPSR), Archeological Survey Report (ASR), and Finding of No Adverse Effect (FOE) for the Kost Road Improvements at UPRR Crossing Project. May 2025.

State Water Resources Control Board (SWRCB). 2024. GeoTracker. Available Online:
<https://geotracker.waterboards.ca.gov/>. Date Accessed: January 15, 2025.

1. Attachments

Attachment A:

- Figure 1 – Regional Location
- Figure 2 – Project Vicinity
- Figure 3 – Project Details

Attachment A: Figures

Figure 1 – Regional Location

Figure 2 – Project Vicinity

Figure 3 – Project Details

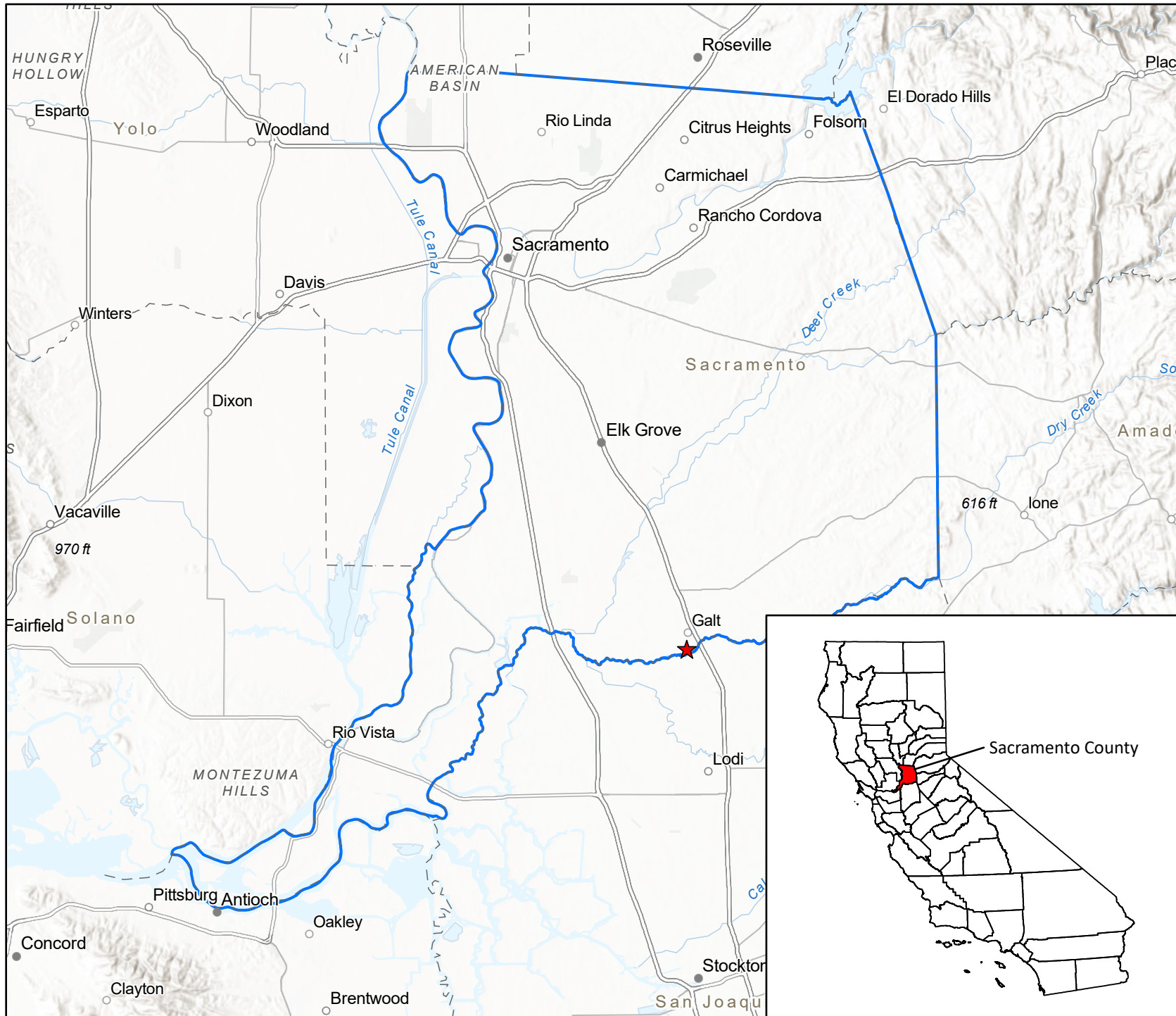
Regional Location

Kost Road Improvements at UPRR Crossing Project, City of Galt

Figure 1

Legend

- ★ Project Location
- Sacramento County



Author: I. Ciraulo
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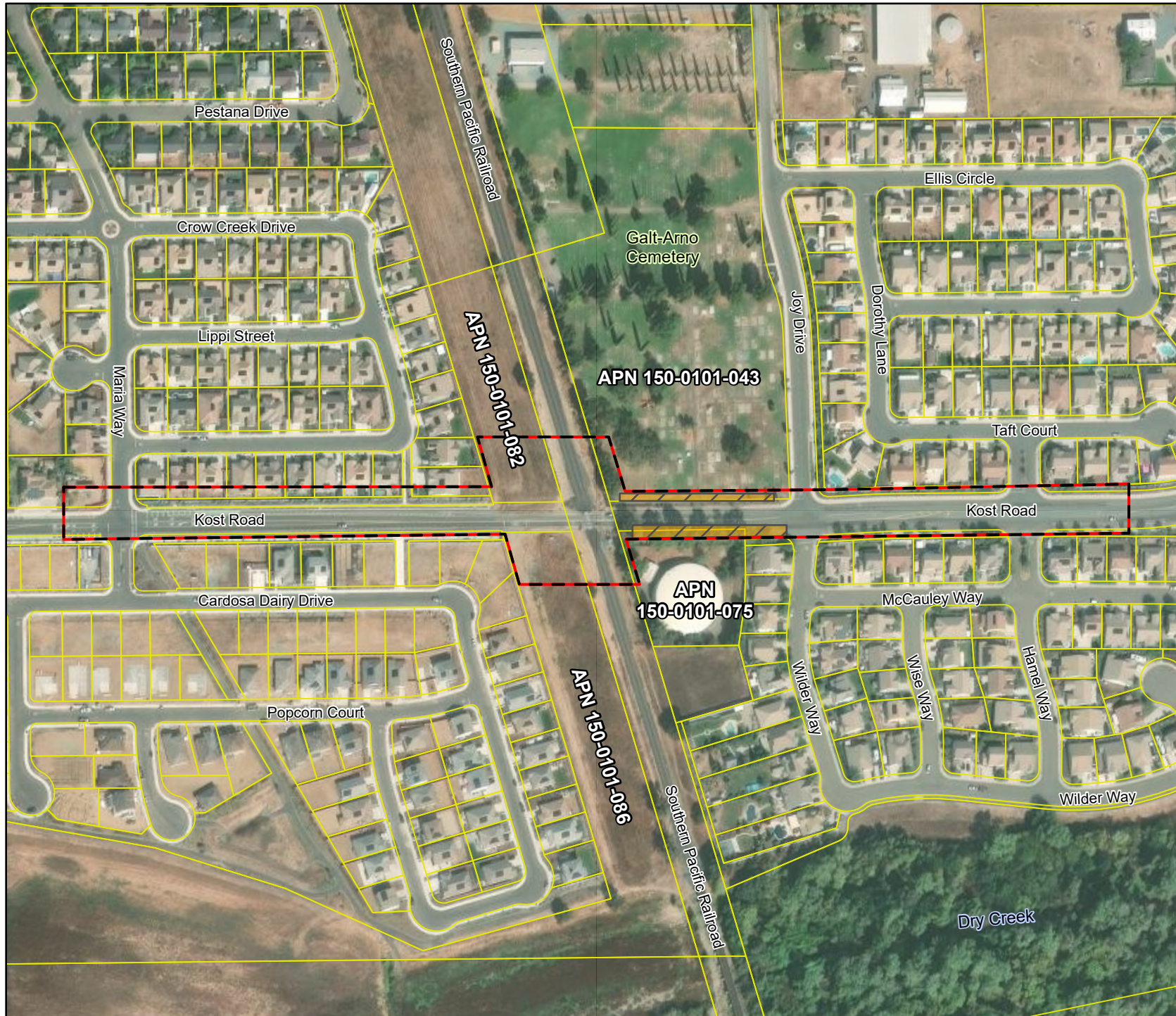
Project Vicinity

Kost Road Improvements at UPRR Crossing Project, City of Galt

Figure 2

Legend

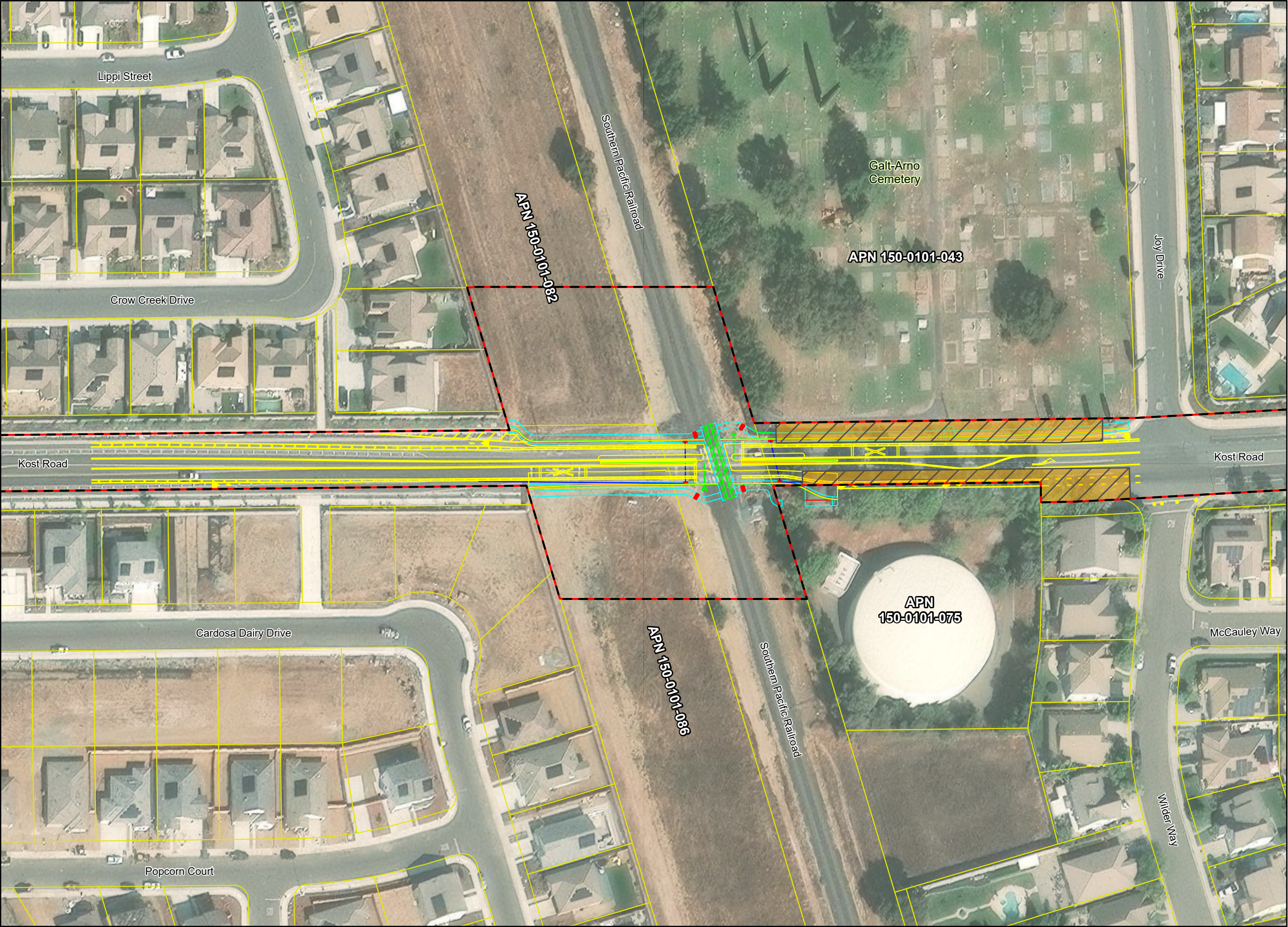
-  Project Area
-  Potential Staging Area
-  Parcels



0 300
Feet

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Last updated on Monday, June 9, 2025

Project Details



Kost Road Improvements at UPRR Crossing Project, City of Galt

Figure 3

Legend

- Project Area
- Potential Staging Area
- Parcels

Project Details

- Road Striping and Pavement Delineation
- Edge of Pavement
- Flow Lines
- Drainage Systems
- Curbs and Railroad Crossing Improvements
- Road Striping and Pavement Delineation

0 100 Feet



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