

Foothill-De Anza Community College District

ATHLETIC FIELDS TURF REPLACEMENT

July 2026 | CEQA Exemption Memorandum



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for Foothill-De Anza Community College District

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All documents cited in this report and used in its preparation are hereby incorporated by reference into this document. Copies of documents referenced herein are available for review at the Foothill-De Anza Community College District, 12345 El Monte Road, Los Altos Hills, California 94022.

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1. INTRODUCTION

The Foothill-De Anza Community College District (District) is proposing a program to replace the existing artificial turf on all four of the athletic fields at Foothill College and two fields at De Anza College with next-generation artificial turf (proposed project). This memorandum evaluates the appropriateness of a Categorical Exemption for the proposed project pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15301, *Existing Facilities*, and Section 15302, *Replacement or Reconstruction*. The District is the lead agency for the proposed project in accordance with the CEQA Statute and Guidelines.

The District anticipates that these like-for-like replacement activities would occur over time as individual fields reach the end of their useful lives, beginning with the Foothill College football field. This memorandum evaluates the replacement program as a whole because each replacement consists of substantially similar work within existing athletic field footprints and does not expand the existing use or capacity of the facilities.

Once it is determined that an activity is a project subject to CEQA, it is then determined whether the project is exempt from CEQA. Pursuant to State CEQA Guidelines Section 15061(b), a project is exempt from CEQA if:

1. The project is exempt by statute (see, e.g., Article 18, commencing with Section 15260).
2. The project is exempt pursuant to a categorical exemption (see Article 19, commencing with Section 15300) and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2.
3. The activity is covered by the common-sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.
4. The project will be rejected or disapproved by a public agency (see Section 15270[b]).
5. The project is exempt pursuant to the provisions of Article 12.5 of Chapter 3.

Article 19, *Categorical Exemptions*, of the State CEQA Guidelines includes a list of classes of projects that have been determined not to have a significant effect on the environment and are, as a result, exempt from review under CEQA, consistent with State CEQA Guidelines Section 15061(b)(2). These categorical exemptions are established through the formal regulatory rulemaking process administered by the California Secretary for Natural Resources, pursuant to statutory authority granted under CEQA (Public Resources Code Sections 21000–21189).

1. INTRODUCTION

Through this process, the Secretary evaluates categories of projects that, based on past experience and environmental analysis, do not ordinarily result in significant environmental impacts, and therefore may be exempted from further CEQA review.

This document describes how the proposed project qualifies for a Class 1 Categorical Exemption, as defined in Section 15301 of the State CEQA Guidelines, and a Class 2 Categorical Exemption, as defined in Section 15302 of the State CEQA Guidelines. A Class 1 Categorical Exemption 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 an existing or former use. A Class 2 Categorical Exemption consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

In addition, this document demonstrates that none of the exceptions to categorical exemptions in the State CEQA Guidelines Section 15300.2, *Exceptions*, apply to the proposed project. The exceptions are further discussed in this memorandum in Section 4, *Exceptions*, and include the following:

- (a) The project is not within a sensitive environment;
- (b) There would be no cumulative impacts;
- (c) There would be no significant effects on the environment due to an unusual circumstance;
- (d) There would be no impacts on a scenic highway;
- (e) The project site is not on a hazardous waste site; and
- (f) There would be no impacts on historical resources.

2. PROJECT DESCRIPTION

Foothill-De Anza Community College District (District) is proposing to replace the existing artificial turf on all four athletic fields at Foothill College and two fields at De Anza College with next-generation artificial turf (proposed project). A detailed description of the improvements is provided in Section 2.5, *Proposed Project*.

2.1 REGIONAL LOCATION

2.1.1 Foothill College

One of the project sites is Foothill College in the Town of Los Altos Hills. Los Altos Hills is approximately 35 miles southeast of San Francisco and 20 miles northwest of downtown San José in Santa Clara County. Los Altos Hills is surrounded by the city of Palo Alto to the north, the cities of Los Altos and Mountain View to the east, the city of Cupertino to the south, and open space to the west.

2.1.2 De Anza College

The other project site is De Anza College in the City of Cupertino. The City of Cupertino is approximately 37 miles southeast of San Francisco and 2 miles west of downtown San José, within Santa Clara County. Cupertino is surrounded by the city of Sunnyvale to the north, the city of Santa Clara to the east, the city of Saratoga to the south, and open space to the west.

2.2 PROJECT LOCATION

2.2.1 Foothill College

The Foothill College campus is at 12345 El Monte Road in Los Altos Hills. The project site includes four athletic fields along the perimeter of the campus. As shown on Figure 1, *Foothill College Turf Replacement Locations*, three are in the northwest corner: the futsal court, the Foothill College Soccer Field, and the Foothill College Softball Field; and one is at the southeast corner: the Foothill Football Field and Track. The campus is surrounded by open space, residential development, and agricultural land, with Interstate (I-) 280 to the north and east. The campus is bounded by Josefa Lane to the north, I-280 to the east, El Monte Road to the south, and Elena Road to the west. Perimeter Road runs through campus, south of the

2. PROJECT DESCRIPTION

northwest fields and north of the football field, and connects to El Monte Road. Purissima Creek, a seasonal drainage, is along the northwestern boundary of the campus and Adobe Creek runs through the southern part of the campus.

2.2.2 De Anza College

The De Anza College campus is at 21250 Stevens Creek Boulevard in Cupertino. As shown on Figure 2, *De Anza College Turf Replacement Locations*, the project site includes two athletic fields in the southern part of campus: the De Anza College Football Field and De Anza College Soccer Field. The campus is surrounded by residential and urban development, with State Route (SR-) 85 to the west. The campus is bounded by Stevens Creek Boulevard to the north, South Sterling Road to the east, McClellan Road to the south, and SR-85 to the west. Campus Drive runs through campus, east and south of the fields.

2.3 EXISTING SITE CONDITIONS

The project sites consist of existing athletic fields with artificial turf and are within existing college campuses. The majority of the 122-acre Foothill College campus and 112-acre De Anza College campus are almost entirely developed with buildings, parking lots, roadways, pedestrian and bicycle facilities, athletic fields, public plazas, and landscaping.

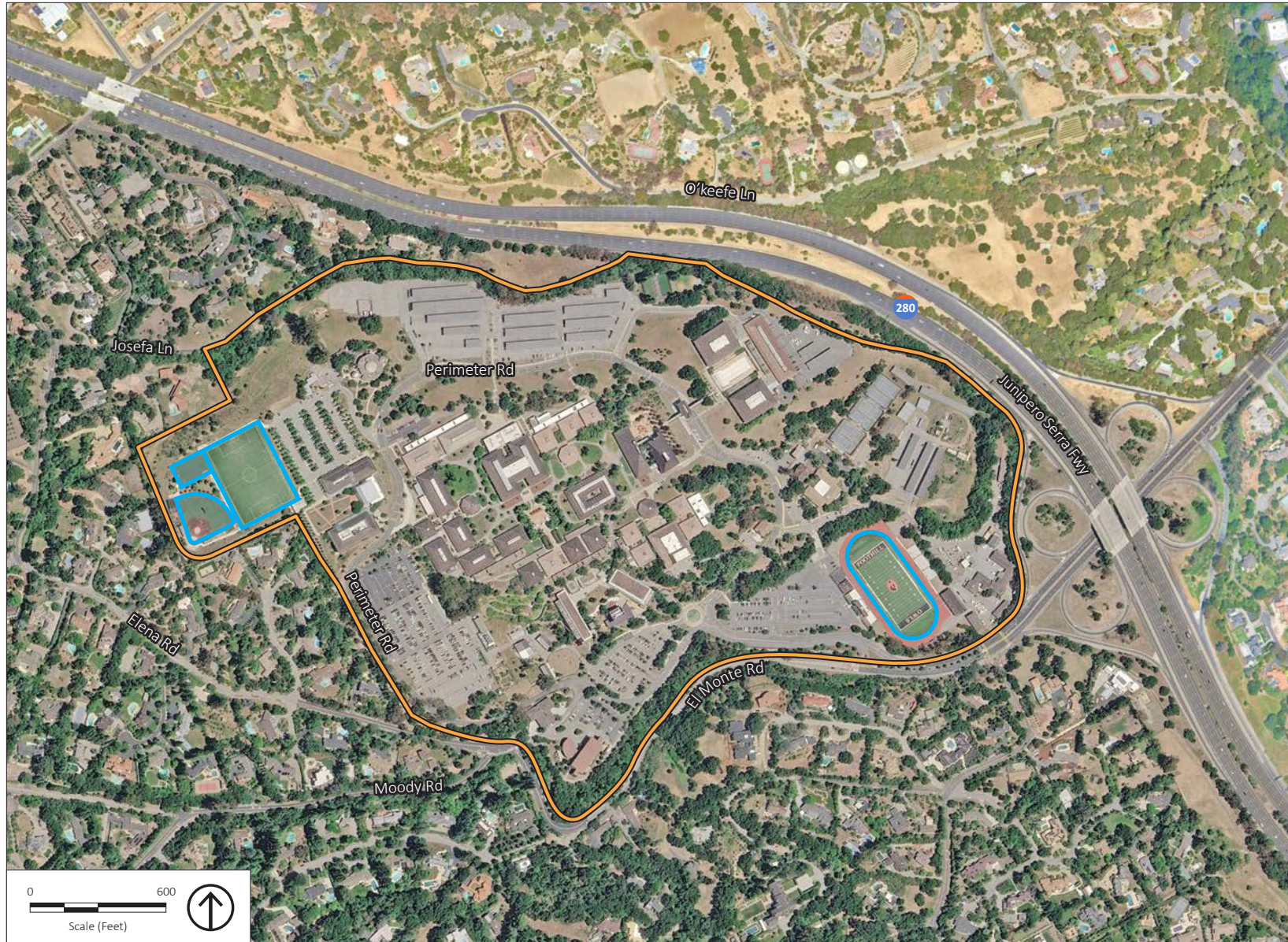
2.4 LAND USE AND ZONING DESIGNATIONS

Foothill College is designated as Institutional in the Los Altos Hill General Plan and is zoned as Residential-Agricultural (R-A) (Los Altos Hills 2007). De Anza College is designated Public Facilities in the Cupertino General Plan and is zoned as Public Building (BA) (Cupertino 2026). The Division of the State Architect has jurisdiction over building development on campus.

2.5 PROPOSED PROJECT

The District proposes replacing the artificial turf on four athletic fields at Foothill College and two at De Anza College. The proposed project does not include the conversion of any natural grass fields to artificial turf. There would be no tree removal or landscaping included as part of the proposed project. The proposed project does not include changes to student enrollment or campus capacity.

2. PROJECT DESCRIPTION



Source: Google Earth, 2026 (Imagery 5/17/2026); PlaceWorks, 2026.

 Foothill College Campus Boundaries
 Artificial Turf Locations

Figure 1
Foothill College Turf Replacement Locations

2. PROJECT DESCRIPTION



Source: Google Earth, 2026 (Imagery 4/17/2026); PlaceWorks, 2026.



De Anza College Campus
Boundaries



Artificial Turf Locations

Figure 2
De Anza College Turf Replacement Locations

2. PROJECT DESCRIPTION

2.5.1 Turf Replacement

The proposed project would include the replacement of the existing artificial turf fields on six fields at Foothill and De Anza Colleges. These replacement activities would occur over time as the individual fields reach the end of their useful lives and would remain entirely within the existing field footprints. Table 1, *Athletic Fields*, shows the use and approximate size of each field included in the proposed project and when each field had artificial turf last installed.

Table 1 Athletic Fields

Campus	Use	Size (Acres)	Turf Last Installed
Foothill College	Football	2.24	2011
Foothill College	Futsal	0.30	2015
Foothill College	Soccer	2.33	2018
Foothill College	Softball	0.71	2011
De Anza College	Football	2.0	2018
De Anza College	Soccer	2.44	2018

The proposed project would include removal and replacement of the existing artificial turf and infill; inspection and localized repair of portions of the existing shock pad, aggregate base, and drainage system, where necessary, to restore the existing field to its intended function; and installation of new synthetic turf, infill, and field markings. Any earthwork would be limited to localized excavation, grading, re-compaction, and aggregate replacement. The existing turf would be replaced with next-generation artificial turf that would include PFAS (per- and polyfluoroalkyl substances)-free materials. The new artificial turf would incorporate the most currently available heat-reduction technology. The District's procurement documents would establish detailed requirements governing the replacement turf system, including applicable material, environmental, performance, testing, and end-of-life management requirements.

All work would be limited to maintaining or restoring the existing athletic fields in place. The replacement of the existing turf would not expand the campuses' use of artificial turf on campus athletic fields, increase usage or capacity of the existing fields, or create any additional changes to the existing fields or other campus facilities. The proposed project would not expand the athletic facilities, modify field dimensions, alter the existing overall grading or drainage design, or otherwise change the established use of the site.

2.5.2 Construction Schedule

The proposed project's construction is expected to occur in phases. The turf replacement activities at each field are expected to have a duration of approximately eight weeks. The field would not be usable during replacement. Construction work at Foothill College would occur

2. PROJECT DESCRIPTION

between 7:30 a.m. and 6:00 p.m. on Monday through Saturday. Construction work at De Anza College would occur between 7:00 a.m. and 6:00 p.m. on weekdays and 7:00 a.m. and 5:00 p.m. on weekends.

2.6 REQUIRED PERMITS AND APPROVALS

Following Board approval of the Notice of Exemption, staff would return to the Foothill-De Anza Community College District Board (Board) with a recommended artificial turf system that would satisfy the District's environmental, performance, and sustainability requirements. If approved, the District would procure the turf material through a cooperative purchasing agreement. District staff would then advertise for construction bids and subsequently return to the Board for award of a construction contract.

3. EXEMPTIONS

As stated in Section 1, *Introduction*, Article 19 of the State CEQA Guidelines includes 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 project qualifies for Class 1 and Class 2 Categorical Exemptions, consistent with the provisions of State CEQA Guidelines Sections 15301 and 15302.

3.1 SECTION 15301: EXISTING FACILITIES

According to Section 15301 of the State CEQA Guidelines, 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. State CEQA Guidelines Section 15301 provides a list of example projects that is not intended to be all-inclusive of the types of projects that might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.

The proposed project is consistent with a Class 1 categorical exemption as it would replace the existing artificial turf on existing athletic fields that already use artificial turf. The new turf would be similar to (or more environmentally beneficial than) the existing artificial turf to be replaced. The proposed project would not change or expand the use or capacity of the existing fields and would not involve any additional improvements to existing campus facilities. Because the proposed project replaces existing improvements without expanding use, it meets the criteria for the Class 1 categorical exemption under State CEQA Guidelines Section 15301.

3.2 SECTION 15302: REPLACEMENT OR RECONSTRUCTION

According to Section 15302 of the State CEQA Guidelines, Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

3. EXEMPTIONS

The proposed project is consistent with a Class 2 categorical exemption because it replaces and repairs existing artificial turf systems with new artificial turf systems. The artificial turf and fields would serve the same purpose and capacity within the existing athletic field footprints. Because the proposed project replaces existing facilities without expanding use or changing purpose, it meets the criteria for the Class 2 categorical exemption under State CEQA Guidelines Section 15302.

4. EXCEPTIONS

In addition to analyzing the applicability of State CEQA Guidelines Sections 15301 and 15302, this document assesses whether any of the exceptions to categorical exemptions identified in State CEQA Guidelines Section 15300.2, *Exceptions*, apply to the proposed project. The following analysis compares the criteria in State CEQA Guidelines Section 15300.2 to the proposed project and concludes, based on substantial evidence, that none of the exceptions are applicable to the project.

4.1 SECTION 15300.2(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 to all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

Consideration of this exception is not necessary because the proposed project qualifies for a Class 1 and Class 2 categorical exemption. Additionally, the project sites are on existing college campuses in developed areas. Therefore, the exception under State CEQA Guidelines Section 15300.2(a) does not apply to the proposed project.

4.2 SECTION 15300.2(B): CUMULATIVE IMPACT

All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The proposed project would replace existing artificial turf with updated artificial turf on existing athletic fields on existing college campuses. There would be no changes in student enrollment or visitors, and the rest of the athletic facilities would remain unchanged. Any construction effects would be temporary, confined to the project sites, and reduced to the extent feasible through compliance with applicable regulations. As described in Section 4.3 regarding State CEQA Guidelines Section 15300.2(c), *Significant Effect*, the construction activities would not result in a significant effect, and, because the proposed project would not increase the use or capacity of the existing fields, the operational effects of the proposed project would not be different from baseline conditions. Therefore, the proposed project would not contribute to

4. EXCEPTIONS

potential cumulative effects, and the exception under State CEQA Guidelines Section 15300.2(b) does not apply to the proposed project.

4.3 SECTION 15300.2(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.

This exception applies only when there is evidence both that the proposed project involves unusual circumstances and that it will result in a significant impact due to those unusual circumstances. There are no known unusual circumstances that are applicable to the proposed project, and which may result in a significant effect on the environment. The proposed project consists of the replacement of artificial turf on existing athletic fields. The District originally chose to install artificial turf, rather than natural turf, on the play fields to reduce the use of water for irrigation, reduce costs to the District, and ensure the fields are available for use year-round. Additionally, the proposed project would not result in a change in existing land use or zoning designations or introduce a new activity to the area that could result in a significant effect on the environment. The proposed project is required for field maintenance to ensure safe and appropriate use of the existing fields. Such activities are typical for athletic fields and college campuses, and are the type of maintenance and repair activities involved in projects that qualify for a Class 1 and Class 2 categorical exemptions. Therefore, the exception under State CEQA Guidelines Section 15003.2(c) does not apply to the proposed project.

4.4 SECTION 15300.2(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 environmental impact report (EIR).

The proposed project would not affect a scenic resource in a designated State scenic highway. The football field at Foothill College is the closest field in the proposed project to a State scenic highway, as it is 850 feet west of I-280, which is eligible for listing as a State scenic highway. The closest officially designated State scenic highways to Foothill College are SR-35, approximately 4.7 miles west of the project site, and I-280 in San Mateo County, 4.6 miles north of the project site. I-280, approximately 1.1 miles north of De Anza College, is also eligible for listing. The closest officially designated State scenic highway to De Anza College is SR-9, 10 miles south of the campus (Caltrans 2026).

4. EXCEPTIONS

Based on the topography of the area and surrounding mature trees and other development, the project sites are not visible from the nearest eligible and officially designated State scenic highways. Additionally, because the proposed project includes a like-for-like replacement of existing artificial turf without any expansion or other alterations to existing facilities, the proposed project would not change the visual appearance of the project sites when compared to existing conditions. Therefore, no scenic resources within view of a State scenic highway would be altered as part of the project and the exception under State CEQA Guidelines Section 15003.2(d) does not apply to the proposed project.

4.5 SECTION 15300.2(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.

California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites. CEQA¹ requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified. The required lists of hazardous material release sites are commonly referred to as the “Cortese List,” named after the legislator who authored the legislation and are contained on internet websites hosted by the boards or departments referenced in the statute, including California Department of Toxic Substance Control’s (DTSC’s) online EnviroStor database and the State Water Resources Control Board’s (SWRCB’s) online GeoTracker database.

A search of the following online databases that constitute the Cortese List was completed, pursuant to Section 65962.5 of the Government Code:

- List of Hazardous Waste and Substances sites from DTSC EnviroStor database (DTSC 2026)
- List of Leaking Underground Storage Tank (LUST) sites from SWRCB’s GeoTracker (SWRCB 2026a)
- List of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit (CalEPA 2026a)
- List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from SWRCB (CalEPA 2026b)
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC (CalEPA 2026c)

¹ California Public Resources Code, Section 21092.6.

4. EXCEPTIONS

The Foothill College campus is listed on the SWRCB's GeoTracker website as a completed LUST cleanup site. The case was closed as of March 15, 1996 (SWRCB 2026b). The De Anza College campus is also listed on the SWRCB's GeoTracker website as a completed LUST cleanup site. The case was closed as of December 28, 1995 (SWRCB 2026c). Neither campus contains an active case, and neither is on any other list pursuant to Section 65962.5 of the Government Code. The proposed project would not involve substantial soil disturbance (e.g., excavation, foundation construction) or a change in land uses that would have the potential to increase hazardous materials exposure when compared to existing conditions. Therefore, the exception under State CEQA Guidelines Section 15300.2(e) does not apply to the proposed project.

4.6 SECTION 15300.2(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 Foothill College campus includes the potential Foothill College Historic District, which has been identified as potentially eligible for listing in the National Register of Historic Places and the California Register of Historical Resources (FDA 2025; FDA 2009). The proposed project would involve the like-for-like replacement of existing artificial turf within the existing field footprints and would not physically affect any area outside of the athletic fields. Further, the proposed project would not demolish or alter contributing buildings, structures, landscape features, or other potential historic resources, nor would it modify the characteristics that convey the significance of the potential historic district. No designated historic resources are present at De Anza College (FDA 2008). Thus, proposed project would not result in significant impacts to built historical resources.

Several archaeological sites have been recorded along Adobe Creek, through the southern part of the Foothill College campus, just north of the football field, and the Santa Clara Valley is known for having buried archaeological resources. However, there have been no archaeological sites recorded on the campus (FDA 2025; FDA 2009). Additionally, De Anza College may have unknown archaeological resources (FDA 2008). The only ground-disturbing activities included as part of the proposed project would remove the existing turf. Substantial groundwork would not be required and, thus, archaeological sites would not be expected to be impacted. Should sensitive resources be found during construction, the proposed project would be required to comply with State and federal historic preservation laws, regulations, and codes, including laws related to archaeological resources. In particular, the proposed project would be required to comply with California Health and Safety Code Section 7050.5, which specifies procedures to be used in the event of the discovery of human remains. With mandatory compliance with applicable laws and regulations, the proposed project would not adversely affect subsurface historic resources. Therefore, the exception under State CEQA Guidelines Section 15300.2(f) does not apply to the proposed project.

5. CONCLUSION

As discussed in Section 3, *Exemptions*, the proposed project meets the criteria for the Class 1, *Existing Facilities*, and Class 2, *Replacement and Reconstruction*, categorical exemptions, pursuant to State CEQA Guidelines Sections 15301 and 15302, respectively. Additionally, as explained in Section 4, *Exceptions*, no exceptions to the categorical exemptions in State CEQA Guidelines Section 15300.2 apply, and the proposed project would not have a significant effect on the environment. Thus, this analysis finds that an exemption may be used, and a Notice of Exemption may be prepared for the proposed project.

5. CONCLUSION

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