



**CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION
DETERMINATION FORM (rev. 06/2022)**

Project Information

Project Name: Hilmar Complete Street

DIST-CO-RTE: 10-MER-165

PM/PM: 32.87/34.44

EA: 10-1P140

Federal-Aid Project Number: N/A

Project Description

The California Department of Transportation proposes to install Complete Streets elements and address flooding on State Route 165 from postmile 32.87 to postmile 34.4 in the City of Hilmar in Merced County. The project proposes to remove existing culverts and sidewalks and install Class II bike lanes, sidewalks, high visibility crosswalk enhancements, Americans with Disabilities Act-compliant curb ramps, culverts, inlets, a stormwater lift station, a retention basin, and a traffic census station. The project will require the acquisition of right-of-way. Construction of the project may require utility relocation and a detour. See Continuation Sheet

Caltrans CEQA Determination (Check one)

☐ **Not Applicable** – Caltrans is not the CEQA Lead Agency

☐ **Not Applicable** – Caltrans has prepared an IS or EIR under CEQA

Based on an examination of this proposal and supporting information, the project is:

☐ **Exempt by Statute.** (PRC 21080[b]; 14 CCR 15260 et seq.)

☒ **Categorically Exempt. Class 1(c).** (PRC 21084; 14 CCR 15300 et seq.)

☒ No exceptions apply that would bar the use of a categorical exemption (PRC 21084 and 14 CCR 15300.2). See the [SER Chapter 34](#) for exceptions.

☐ **Covered by the Common Sense Exemption.** This project does not fall within an exempt class, but it can be seen with certainty that there is no possibility that the activity may have a significant effect on the environment (14 CCR 15061[b][3].)

Senior Environmental Planner or Environmental Branch Chief

Laura Cook

Print Name

Laura M. Cook

Signature

06/16/2026

Date

Project Manager

Sukhjinder Singh

Print Name

Sukhjinder Singh

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06/16/2026

Date



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

Caltrans NEPA Determination (Check one)

☐ **Not Applicable**

Caltrans has determined that this project has no significant impacts on the environment as defined by NEPA, and that there are no unusual circumstances as described in 23 CFR 771.117(b). See [SER Chapter 30](#) for unusual circumstances. As such, the project is categorically excluded from the requirements to prepare an EA or EIS under NEPA and is included under the following:

☒ **23 USC 326:** Caltrans has been assigned, and hereby certifies that it has carried out the responsibility to make this determination pursuant to 23 USC 326 and the Memorandum of Understanding dated April 18, 2022, executed between FHWA and Caltrans. Caltrans has determined that the project is a Categorical Exclusion under:

☒ **23 CFR 771.117(c): activity (c)(3)**

☐ **23 CFR 771.117(d): activity (d)(Enter activity number)**

☐ **Activity Enter activity number listed in Appendix A of the MOU between FHWA and Caltrans**

☐ **23 USC 327:** Based on an examination of this proposal and supporting information, Caltrans has determined that the project is a Categorical Exclusion under 23 USC 327. The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated May 27, 2022, and executed by FHWA and Caltrans.

Senior Environmental Planner or Environmental Branch Chief

Laura Cook

Print Name

Laura M. Cook

Signature

06/16/2026

Date

Project Manager/ DLA Engineer

Sukhjinder Singh

Print Name

Sukhjinder Singh

Signature

06/16/2026

Date

Date of Categorical Exclusion Checklist completion (if applicable): 5/4/2026

Date of Environmental Commitment Record or equivalent: 5/4/2026

Briefly list environmental commitments on continuation sheet if needed (i.e., not necessary if included on an attached ECR). Reference additional information, as appropriate (e.g., additional studies and design conditions).



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

Continuation sheet:

Purpose and Need

The purpose of the project is to improve mobility for roadway users and address stormwater issues within the project limits.

The project is needed to address stormwater issues and to bring the corridor within the project limits up to standard in compliance with the 1990 Americans with Disabilities Act

Description of Work

The California Department of Transportation (Caltrans) proposes to construct Complete Streets and drainage improvements on State Route (SR) 165 from postmile 32.87 to postmile 34.44 in the City of Hilmar, Merced County.

The project would install approximately 15,840 linear feet of new Class II buffered bicycle lanes. Pedestrian improvements would include construction of approximately 6,890 linear feet of new sidewalk, reconstruction of approximately 6,980 linear feet of existing sidewalk, installation of six new Americans with Disabilities Act (ADA)-compliant curb ramps, and upgrade of 31 existing curb ramps to current ADA standards. The project would also reconstruct 99 existing driveways within the project limits.

Roadway improvements would include widening shoulders using Hot Mix Asphalt (HMA) (Type A) to accommodate bicycle facilities. Traffic and safety enhancements would include upgrading five signal and lighting systems, upgrading three flashing beacon systems, upgrading two pedestrian hybrid beacon systems, installing two traffic monitoring stations, and installing approximately 1,348 linear feet of crosswalks at six locations.

Drainage improvements would include installation of 37 new culverts totaling approximately 3,871 linear feet, 18 drainage inlets, and 16 manholes with frames and covers. The project would also construct one retention basin and one stormwater lift station near postmile 34.21 to address localized flooding and stormwater management needs.

Construction activities would require temporary traffic control measures, which may include lane closures, one-way traffic control, and short-term detours to maintain traffic flow and ensure worker and public safety.

The project focuses on improving multimodal access and bringing pedestrian facilities into compliance with ADA standards as part of Complete Streets implementation. Improvements to existing nonstandard roadway features are not included in the project scope due to right-of-way constraints; these features are addressed separately in a Design Standard Decision Document (DSDD).

General



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

The project is Categorical Exempt under the California Environmental Quality Act and Categorical Excluded under the National Environmental Policy Act unless: 1) the scope of the project changes to include additional activities or areas; or 2) there is unforeseen discovery of sensitive or cultural resources. Environmental reevaluation will be required if either of these conditions are met.

Air Quality

Per the Air Quality Compliance Study, dated November 26, 2024, this project is not expected to cause any operational effects on air pollutants and is not capacity increasing.

During construction, the proposed project will generate air pollutants. Caltrans Standard Specifications pertaining to dust control and dust palliative requirements are a required part of all construction contracts and should effectively reduce and control emission impacts during construction. The provisions of Caltrans Standard Specifications, Section 14-9.02 "Air Pollution Control" and Section 10-5 "Dust Control," require the contractor to comply with the air pollution control rules, ordinances, and regulations and statutes that apply to work performed under the contract, including those provided in CFR § 11017.

If the project disturbs over 5 acres or removes 2,500 cubic yards of soil for at least three days of the project, a Dust Control Plan (DCP) approved by the San Joaquin Valley Air Pollution Control District will be required for this project.

Biological Resources

Per the Biological Resources Evaluation No Effect Memo, dated June 2, 2025, the following significance determinations have been made: based on the scope and description of the proposed project, no state or federally listed species; designated critical habitat; state or federally recognized sensitive habitats, or potential waters of the U.S. associated with this geographic region will be impacted or affected by the proposed project as long as the scope of work remains unchanged. The project passes over the Stevinson Lower Later Canal. However, Waters of the U.S (WOUS) and Waters of the State are not expected to be impacted by project construction. Additionally, Army Corps of Engineer, California Department of Fish and Wildlife, U.S Fish and Wildlife Service, or Regional Water Quality Board permits will not be required for the proposed project.

With the implementation of the Caltrans 2025 Standard Special Provisions 14-6.03B (Bird Protection) or Standard Special Provisions 14-6.03A, the proposed construction activities for the project are not expected to result in the "take" (as defined by the MBTA or as defined by California Fish and Game Code) of any migratory birds, raptors, or their active nests.



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

For work that is scheduled for between February 1st and September 30th, a nesting migratory bird/nesting raptor survey would be performed 14 days before the proposed start date of any construction-related activities. Construction work would be approved if a survey of the job site within 14 days before the proposed start of the construction activity shows an absence of nesting birds, and a no work buffer may be implemented if active nests are discovered with monitoring for clearance.

- If construction activities fail to commence within 14 days of the date when preconstruction avian surveys are conducted, or if there is a halt to the activities with a delay of more than 14 days, another nesting migratory bird/nesting raptor survey must be performed before construction activities can recommence.

If nesting migratory birds or raptors are found during the preconstruction survey or during construction activities, the following Environmentally Sensitive Area (ESA) buffers will be required in accordance with Caltrans 2025 Standard Special Provisions 14-6.03A or 14-6.03B:

- If any active migratory bird nest is observed, a 100-foot ESA buffer must be implemented and avoided until the young have fledged or a qualified biologist determines that construction may proceed.
- If an active raptor nest is observed, a 300-foot ESA buffer must be implemented and avoided around the nest until the young have fledged or a qualified biologist determines that construction may proceed.
- If an active tricolored bird nest is observed, a 250-foot ESA buffer must be implemented and avoided around the nest until the young have fledged or a qualified biologist determines that construction may proceed.

Climate Change for CEQA

Per the Climate Change Risk and Adaptation Report, dated December 8, 2025, the purpose of the proposed project is to improve mobility for roadway users and address stormwater issues within the project limits. This type of project generally causes minimal or no increase in operational GHG emissions and will not increase the vehicle capacity of the roadway. Because the project would not increase the number of travel lanes on SR 165, no increase in vehicle miles traveled (VMT) would occur. While some GHG emissions during the construction period would be unavoidable, no increase in operational GHG emissions is expected.

All construction contracts include Caltrans Standard Specifications related to air quality. Section 7-1.02A and 7 1.02C, Emissions Reduction, requires contractors to comply with all laws applicable to the project and to certify they are aware of and will comply with all ARB emission reduction regulations. Section 14-9.02, Air Pollution Control, requires contractors to comply with all air pollution control rules, regulations, ordinances, and statutes. Certain common regulations, such as equipment idling restrictions, that reduce construction vehicle emissions also help reduce GHG emissions.



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

The following additional measures will be implemented in the project to reduce GHG emissions and potential climate change impacts from the project.

- Caltrans will implement energy efficient construction methodologies.
- Caltrans will implement water efficient construction methodologies.
- Caltrans will incorporate Complete Streets components that make non-auto modes of transportation more attractive.
- Caltrans will incorporate heat resistant materials for culverts and Complete Street elements (signage, etc).
- Where available, Caltrans will utilize material within a local radius of the project area and/or locally available building material be utilized to reduce GHG emissions.
- Caltrans will implement practices for reduction of roadway construction /demolition waste.
- Caltrans will implement fuel efficient measures both for construction equipment and traffic management during delays or detours.
- Caltrans will limit idling to 5 minutes for delivery and dump trucks and other diesel-powered equipment (with some exceptions).
- Caltrans will use alternative fuels such as renewable diesel for construction equipment.
- Caltrans will select pavement materials that lower the rolling resistance of highway surfaces as much as possible while still maintaining design and safety standards.

Community Impacts

Per the Community Impact Assessment Memo, dated April 23, 2026, the project involves minor right-of-way needs at several parcels for the proposed work; however, the impact of these easements could be considered minimal as they are largely limited to the edges of parcels along State Route 165 for the proposed sidewalk improvements, ADA curb ramp upgrades, signal cabinets, and retention basin. There is potential for one (1) business displacement based on the proposed easements, but this would be determined and coordinated in the project's Plans, Specs, and Estimates (PS&E) phase. Relocation Assistance would be provided, if appropriate. The project is not anticipated to result in any significant adverse impacts to the community of Hilmar. Additionally, Hilmar's pedestrian and bicycle facilities are expected to improve with the installation of the Complete Street elements proposed as part of the project, as well as the drainage improvements.

Cultural Resources

Per the Historic Properties Survey Report, dated March 17, 2026, Caltrans, pursuant to Section 106 PA Stipulation IX.A, has determined that a Finding of No Historic Properties Affected is appropriate for this undertaking. Background research, records searches, pedestrian survey, and subsurface investigations identified no archaeological resources within the Area of Potential Effects (APE). One built environment property within the



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

APE, the Hilmar Covenant Church, was determined eligible for listing in the National Register of Historic Places (NRHP) under Criterion C; however, the undertaking has been designed to avoid the property and will not result in impacts to its character-defining features. Therefore, no historic properties will be affected by the undertaking.

Cumulative Impacts for CEQA

Per the Cumulative Impacts Assessment Memo, dated April 23, 2026, the project is unlikely to result in any cumulative impacts or incrementally significant impacts to any natural resources, community resources, or cultural resources or based on climate change, hazardous waste, land use, or utilities.

Floodplain

Per the Preliminary Floodplain Study, dated August 3, 2022, the proposed project is not located within the 100-year floodplain and does not consist of a longitudinal encroachment or a significant encroachment on the base floodplain.

Hazardous Waste

Per the Initial Site Assessment dated April 7, 2026, a database search identified one (1) open regulated cleanup site, five (5) closed leaking UST sites, and one (1) closed regulated cleanup site within 250 feet of the project area. There is moderate potential for encountering contaminated soils during construction. A soil survey conducted in January 2026 found gasoline-range organics and diesel and oil-range organics detected below ESLs. Naphthalene was detected above residential ESL but below commercial/industrial ESL. No PCBs or other VOCs were detected. Acquisition of contaminated parcels may trigger RACP, but acquisition is not currently proposed.

There is potential to encounter concentrations of Aerially Deposited Lead (ADL) while working in unpaved areas within the project limits. The Caltrans Standard Special Provision, 7-1.02K(6)(j)(iii), which pertains to Earth Material Containing Lead, shall be added to the construction contract. Specific earth material management is required to ensure that the earth material can be defined as unregulated. A lead compliance plan prepared by a Certified Industrial Hygienist (CIH) is required.

It is anticipated that the scope of work for this project may requires yellow thermoplastic/painted striping and pavement markings striping removal prior to cold planing. If the striping is removed from the asphalt prior to cold planing, then Standard Special Provision (SSP) 14-11.12 shall be added to the construction contract and the Contractor shall manage the removed stripe and pavement marking as a hazardous waste. If the scope of work proposes to cold plane the entire road surface, including any yellow paint/thermoplastic striping, and calculations show that the cold planing residue will not be a hazardous waste, then the Caltrans Standard Special Provision (SSP) 36-4 shall be added to the construction contract and waste would be managed as construction debris.



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

Noise

Per the Noise Compliance Study dated December 3, 2024, the project would not introduce any potential for long-term traffic noise impacts under the requirements for a Type I or Type II traffic noise project under 23 CFR 772. Therefore, the project falls under the category of Type III noise projects and would comply with Caltrans Standard Specification Section 14-8.02 "Noise Control" regarding construction noise.

During construction of the project, noise from construction activities may intermittently dominate the noise environment in the immediate area of construction. Construction noise is regulated by Caltrans Standard Specifications Section 14-8.02 "Noise Control," which states construction noise resulting from work activities should not exceed 86 dBA at 50 feet from the job site from 9:00 p.m. to 6:00 a.m.

No adverse noise impacts from construction are anticipated because construction would be conducted in a rural setting and in accordance with Caltrans Standard Specifications Section 14-8.02. Furthermore, implementing the following measures would minimize the temporary noise impacts from construction:

- Do not exceed 86 dBA Lmax at 50 feet from the job site activities from 9:00 p.m. to 6:00 a.m.
- Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler.

Paleontological Resources

Per the Paleontological Identification Report dated December 16, 2025, low potential paleontological resource underlies the project area. The low potential sediments consist of the Pleistocene-aged Modesto Formation. Excavation to a depth of four feet below ground surface is anticipated for a retention basin located at the corner of SR 165 and Echo Road. Scientifically significant fossils are unlikely to be encountered due to the shallow nature of the excavations, the low PFYC of the project area, and the fact that the basin is being advanced in highly disturbed farmland. Paleontological mitigation is not recommended at present.

Section 4(f)

Per the Hilmar Complete Street Project U.S. Department of Transportation Act Section 4(f) *De Minimis* Determination, dated May 2026, the project has the potential to impact two (2) Section 4(f) resources located within 0.5 miles of the project: Hilmar Park and Hilmar Covenant Church. The project proposes permanent easements adjacent to both resources for sidewalk improvements (widening) and curb-ramp upgrades. The easements would not adversely affect the features, qualities, or attributes of the Section



CEQA EXEMPTION / NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

4(f) resources qualifying them for protection under Section 4(f) of the U.S. Transportation Act. Therefore, only *de minimis* Use, or minimal impacts, are anticipated.

Visual

Per the Visual Impact Assessment Questionnaire, dated April 3, 2026, no or negligible visual changes to the environment are proposed and no federally, state, or locally designated scenic or historic resources or other visual resources would be impacted by the project.

Water Quality

Per the Water Quality Compliance Memo, dated November 3, 2024, this project is not anticipated to result in long-term water quality impacts on nearby surface water or groundwater. Short-term potential impacts to nearby surface and groundwater could occur due to accidental spills or poor management of handling hazardous materials, fuels, and other potential chemicals used during construction activities. Any potential impacts (erosion, accidental spills of hazardous material, and disruption to natural drainage) must be addressed, eliminated, or minimized to the maximum extent practicable during the design and construction phases of the project by incorporating the appropriate permanent and temporary BMPs into the project. By incorporating proper and accepted engineering practices and BMPs, the project will not have significant impacts on water quality during construction or its operation.