

Attachment A: Categorical Exemption Determination Memorandum

MEMORANDUM

Date: August 3, 2026

To: Mike Tassano, Deputy Director of Community Development, Transportation

From: Juliet Martin, Project Manager

Subject: West Las Positas Boulevard Multimodal Reconstruction Project – Phase 2 Project Description for Categorical Exemption Determination, City of Pleasanton

INTRODUCTION

The City of Pleasanton (City) is undertaking roadway improvements along the West Las Positas Boulevard (Blvd) roadway corridor. The West Las Positas Boulevard Multimodal Reconstruction Project – Phase 2 (Project) extends from east of Stoneridge Drive to east of Fairlands Drive. The Project will reconstruct a 0.52-mile segment of a larger planned 2.78-mile reconstruction of West Las Positas Blvd. The Project aims to provide high-quality multimodal facilities that improve safety, connectivity, access, drainage, and roadway conditions along the corridor. The combined length of Phase 1 and Phase 2 is 1.68 miles, completing the highest-priority segment of West Las Positas Blvd.

This memorandum evaluates the applicability of categorical exemption(s) for the Project in accordance with the California Environmental Quality Act (CEQA).

PROJECT DESCRIPTION

Project Location

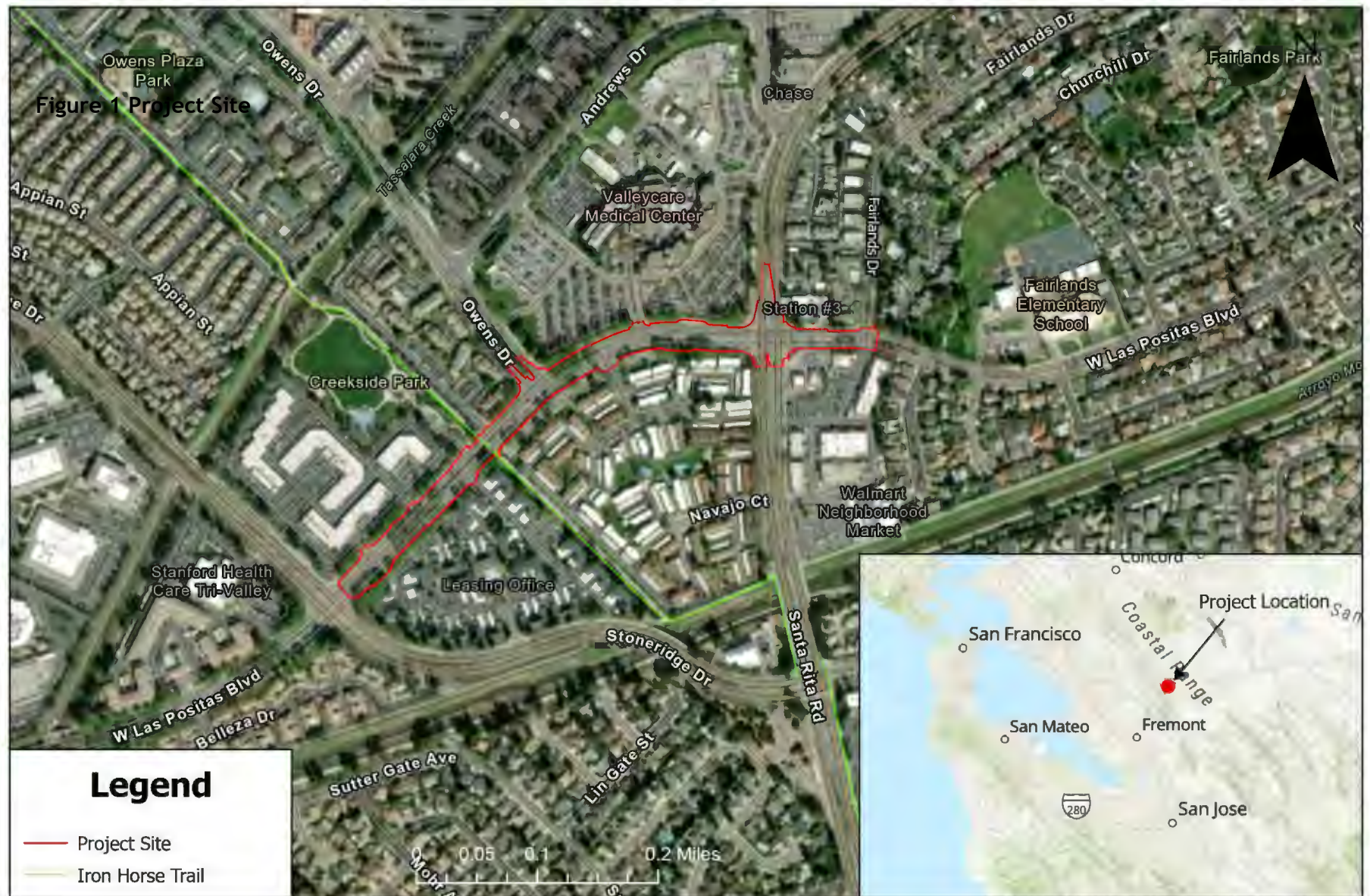
The Project site is located along the West Las Positas Blvd alignment between east of Stoneridge Drive and east of Fairlands Drive in the City of Pleasanton in Alameda County, California. West Las Positas Blvd is located in the northern part of the City, to the east of Interstate (I) 680 and to the south of I-580. The City is the lead agency under the California Environmental Quality Act (CEQA). The location of the Project is illustrated in **Figure 1** below.

Project Components

The Project involves improving the roadway pavement surface, reconfiguring the traffic lanes to construct multimodal facilities between Stoneridge Drive and Fairlands Drive, and making safety improvements. The specific components of the Project include:

- Grinding the existing roadway pavement and placing a hot mix asphalt overlay between Stoneridge Drive and Fairlands Drive;
- Relocating and adjusting the existing utilities;
- Reconfiguring the roadway from a 6-lane section to a 4-lane section with five (5)- to nine (9)-foot-wide elevated bike lanes with a 2-foot wide decomposed granite buffer on both sides between Stoneridge Drive and Santa Rita Road separated by landscape, hardscape, or bioretention areas bicycle and pedestrian areas from vehicular traffic;

West Las Positas Boulevard Multimodal Reconstruction Project- Phase 2



Figure

1

- Restriping the roadway between Santa Rita Road and Fairlands Road to provide five (5)- to eight (8)-foot-wide Class IV bike lanes on both sides;
- Constructing bioretention areas where feasible between Stoneridge Drive and Owens Drive; and
- Improving street lighting and traffic signals between Stoneridge Drive and Santa Rita Road;
- Constructing intersection safety improvements at the intersections of West Las Positas Blvd, Santa Rita Road, Owens Drive, and Fairlands Drive, including protected intersections, high-visibility crosswalk treatments, and modification of curb ramps to address existing safety deficiencies and ensure compliance with the Americans with Disabilities Act; and
- Modifying bus stops along West Las Positas Blvd to conform to the new bicycle facilities.

Other improvements, including restriping, will extend through the curb returns at the roadway intersections with West Las Positas Blvd between Stoneridge Drive and Fairlands Drive. Restriping travel lanes will be included on the side street approaches to West Las Positas Blvd to conform to the Project improvements.

Construction

Construction of the Project is anticipated to take approximately 12 months, beginning in the first quarter of 2027, and concluding in the first quarter of 2028. Construction along West Las Positas Blvd will generally include:

- Temporary lane closures with appropriate detours
- Grinding and overlaying the existing roadway pavement
- Installation of new landscaped and hardscaped buffers, expanded bicycle and pedestrian facilities, bio retention features, high-visibility crosswalk treatments, and other safety features
- Relocation and adjustment of existing utilities

All construction activities, including excavation and staging, will be contained within the current roadway. Temporary “Right of Entry” permits will be required for select properties for instances where private driveways require reconstruction to conform to the new roadway alignment and in instances where the relocation of existing utilities will require access to private parcels. Such acquisitions will occur outside the public right-of-way and will only temporarily affect the existing use of private property. The Project does not require the acquisition or modification of structures or access.

Project Features

As a part of compliance with CEQA, the Project will adhere to the following requirements from the City’s Municipal Codes to minimize impacts during construction:

City of Pleasanton Municipal Code Section 9.04.100-Construction

Notwithstanding any other provision of this chapter, between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sunday and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m., construction, alteration, or repair activities which are authorized by a valid city permit shall be allowed if they meet at least one of the following noise limitations:

- A. No individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet. If the device is housed within a structure on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible; or
- B. The noise level at any point outside of the property plane of the project shall not exceed 86 dBA.

City of Pleasanton Municipal Code Section 13.04.250-Maintaining Traffic

- A. The permittee shall give particular attention to facilitating the flow of vehicular and pedestrian traffic. Unless prior written approval is obtained from the superintendent of streets, the permittee may not:
 - 1. Obstruct more than one-half of the area used by vehicles;
 - 2. Obstruct the area between the curb (or the shoulder if there is no curb) and the right-of-way line in such a way as to create a hazardous path for pedestrians.
- B. The permittee may not obstruct a driveway on a developed property, except that under unusual circumstances, and with forewarning to the occupant of the affected property, a driveway approach may be obstructed for a limited period of time.
- C. The use of flagmen is mandatory where (1) the two-way vehicular traffic has less than 20 feet in which to pass, or (2) vehicular traffic must pass to the left of the dividing islands in passing the site of the encroachment. The permittee may be required to remove excavated material from the site of the encroachment as it is excavated, rather than stockpiling it on the street, when such removal is necessary to permit traffic to pass freely and safely.

City of Pleasanton Municipal Code Section 9.14.130-Construction Activities

All construction sites shall implement effective erosion control, run-on and runoff control, sediment control, active treatment systems (as appropriate), good site management, and non-stormwater management through all phases of construction (including, but not limited to, demolition, site grading, building, and finishing of lots) until the site is fully stabilized by landscaping or the installation of permanent erosion control measures. Construction sites shall conform to the MRP Provision C.6, Construction Site Control, requirements, as well as the following requirements:

- A. Any person performing construction activities in the city of Pleasanton shall implement appropriate BMPs to prevent the discharge of sediment, construction waste, or contaminants from construction materials, tools, and equipment from discharging onto ground surfaces or entering the storm drain system or watercourse.
- B. No construction activity may commence until adequate BMPs have been installed conforming to MRP Provision C.6, Construction Site Control, requirements and the authorized enforcement official has been notified of their completion.
- C. The authorized enforcement official shall have the authority to inspect construction activities within the city of Pleasanton pursuant to Sections 9.14.170 through 9.14.280.
- D. When any work is being performed contrary to the provisions of this section, the authorized enforcement official may order the work stopped by notice in writing served on any persons engaged in doing or causing the work to be done. Such work shall stop until the authorized enforcement official authorizes the work to proceed. This remedy is in addition to and does not

supersede or limit any and all other remedies, both civil and criminal, provided in Sections 9.14.170 through 9.14.280 of the City of Pleasanton Municipal Code

City of Pleasanton Municipal Code Section 13.04.340-Storage of Materials

Unless otherwise approved by the superintendent of streets, no material shall be stored within five feet of a public street, and/or excess earth materials from trenching or other operations shall be removed from the pavement, traveled way, or shoulder as the trench is backfilled or other work carried forward.

In addition, the Project will implement the following avoidance and minimization measures (AMM) to avoid potential impacts to cultural resources during construction of the Project:

- **AMM CR 1- Unanticipated Discovery of Cultural Resources:**

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of CHRIS, per California Code of Regulations Section 15126.4(b)(3)(C).

- **AMM BIO 1- Bird Nesting Survey**

Tree removal will take place outside of nesting bird season (15th February to 31st August). If tree removal takes place during nesting bird season, a biologist will conduct a nesting bird survey in the 7 days prior to removal. If active nests are found, a no-work buffer surrounding the nest will be determined in consultation with CDFW. The no-work buffer will remain in place until the biologist has confirmed the young are foraging independently or the nest has failed.

CATEGORICAL EXEMPTION OVERVIEW

Section 21084 of the California Public Resources Code specifically requires the CEQA Guidelines to include a list of classes (or categories) of projects that have been determined not to have a significant effect on the environment and are therefore exempt from the provisions of CEQA.

The CEQA Guidelines, Cal. Code Regs. tit. 14 Sections 15301 through 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met in order for a project to be

found categorically exempt. Additionally, Section 15300.2 of the CEQA Guidelines includes a list of exceptions to the use of categorical exemptions, none of which may apply to a project for it to qualify for a categorical exemption (CE).

CATEGORICAL EXEMPTION STATUS

The proposed project improvements qualify for a Class 1 Exemption: Pursuant to Section 15301(c) (CEQA Guidelines), the project is categorically exempt from CEQA, as it meets the criteria for a Class 1, Existing Facility project.

Section 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 types of “existing facilities” itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1(c). The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to: 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, transit improvements such as bus lanes, pedestrian crossings, street leads, and other similar alterations that do not create additional automobile lanes.

The Project would fall within the scope of Class 1 exemptions, which allow for minor alterations to existing highways and streets, including pedestrian and bicycle facilities, signal modifications, and transit-related improvements, provided there is no significant expansion of use. Therefore, since the project would aim to improve bicycle and pedestrian access and safety along West Las Positas and would not include the addition of new automobile lanes or an expansion of the existing use, the project is therefore consistent with the qualifications for a Class 1 CE under CEQA Guidelines § 15301(c).

CEQA GUIDELINES SECTION 15300.2 - EXCEPTIONS

CEQA Guidelines Section 15300.2 denotes the exceptions to CEQA CEs. If a project meets the criteria of any of the six exceptions listed below, the project may not be considered for a CE.

This section documents that none of the exceptions in CEQA Guidelines Section 15300.2(a) through (f) disqualify the Project from being found categorically exempt. As described below, use of a categorical exemption Class 1 Subsection 15301(c) to cover the West Las Positas improvements would not meet any of the exception criteria. This section includes a discussion of the consideration of 15300.2 (a) through (f).

(a) Location – Location

This exception does not apply, as the project is not seeking a Class 3, 4, 5, 6, or 11 exemption.

(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.

All aspects of the proposed improvements would occur within the existing roadway prism except for instances where utility relocation requires temporary access permits or when sidewalk and curb improvements would be required. However, these proposed improvements would not generate any off-

site impacts upon the completion of construction. Once the improvements are completed, no other improvements except for routine maintenance activities would be necessary within the roadway. The western end of the Project site would conform to the West Las Positas Improvements project; however, the Project would not overlap with any of the improvements proposed under West Las Positas Improvements project, which are similar in nature to what is proposed under the Project. Therefore, the Project would not result in a cumulative impact.

(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.

All aspects of the proposed improvements would occur within the existing roadway, which have been previously improved by the initial construction of the roadway as well as other projects, including the City's Recycled Water Project and other adjacent development projects in the area.

The noise and vibration levels during construction would not exceed permissible noise thresholds established in the City's Municipal Code Section 9.04.100. In addition, the Project would be required to adhere to Section 9.04.100, "Construction" of the City's Municipal Code, which restricts construction hours between 8:00 am and 8:00 pm daily and requires that noise levels outside of the construction site must not exceed 86 dBA L_{max} . With adherence to the City's Municipal Code, the Project would not result in any significant impacts associated with noise and vibration during construction.

The Project may require temporary traffic detours during construction, which may result in temporary traffic and circulation impacts. However, the Project would be required to adhere to Section 13.04.250 "Maintaining Traffic" of the City's municipal code, which would require at least 50 percent of the roadway to remain open at all times and would also require the Project to maintain pedestrian pathways throughout construction. In addition, these impacts would only be temporary and would cease upon the completion of construction.

The Project may require the removal of mature or protected trees. However, the removal of these trees could potentially result in a disturbance to nesting birds protected under the MBTA and therefore the Project would implement **AMM BIO 1- Bird Nesting Survey**, which would require tree removal to take place outside of the nesting bird season (15th February to 31st August). If tree removal were to be conducted during nesting bird season, a biologist would be required to conduct a nesting bird survey prior to the removal of any trees. With the implementation of **AMM BIO 1**, the Project would not result in any significant impacts to nesting birds associated with the Project.

In May 2026, a Cultural Resources Technical Report was prepared for the Project by Rincon Consultants, which determined that the Project site is generally sensitive for archaeological resources; however, the Project would have a low potential to encounter intact subsurface archaeological deposits due to the history of development and disturbance within the Project site. Furthermore, records searches did not identify any historic period built environment resources within or immediately adjacent to the Project site. Therefore, the Project is not anticipated to result in any significant impacts to cultural or historic resources.

There is potential for the Project to impact previously undiscovered cultural resources and/or human remains within the Project site. However, in the event of human remains are discovered in the Project site, the State of California Health and Safety Code Section 7050.5 states that no further disturbance

shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains.

In the event that previously undiscovered cultural resources are identified within an active project site, the Project would be required to halt work in that area until a qualified archaeologist can assess the significance of the find consistent with the requirements specified under **AMM CR 1**. The implementation of this measure would ensure that the Project preserves the archaeological or historical significance of any previously undiscovered resources and thereby ensures that the Project would avoid significant impacts to cultural resources.

Construction activities would include excavation to replace old pavement and sidewalks, the relocation of utilities when necessary, and the installation of improved bicycle and pedestrian facilities. These construction activities are not anticipated to generate significant environmental effects because they will occur in already disturbed areas and replace existing facilities and would comply with relevant requirements specified in the County and City's municipal code and **AMM CR 1** to minimize and avoid potential impacts. The improved roadway would operate similarly to existing conditions. Therefore, the Project would not have a significant effect on the environment nor involve an unusual circumstance.

(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 state-designated Scenic Highways near the existing crossings.¹ This Project site does not include any significant trees, rock outcroppings, or other potentially scenic resources. As such, the Project would not significantly impact any designated scenic resource, such as trees, historic buildings, rock outcroppings, or similar resources, as defined by CEQA statutes or guidelines. The Project would replace the existing roadway and implement safety improvements, including expanded pedestrian and bicycle facilities. These proposed improvements would not substantially alter the existing aesthetic setting of surrounding structures or the roadway. In addition, all aspects of the proposed improvements would occur within the existing roadway. As such, the Project would not result in an impact on a Scenic Highway or other scenic resources.

¹ Caltrans. 2019. *California Scenic Highway System Map*. Available: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed: July 2, 2026.

(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.

A desktop survey was conducted in July 2026 for the proposed improvements. Based on this desktop search, there are four hazardous waste sites located adjacent to the Project site at the intersection of West Las Positas Boulevard and Santa Rita Road that present a potential environmental risk.² Three of the locations refer to former leaking underground storage tank (LUST) sites that are no longer active and were designated as “closed” in December 2013, November 1997, and July 2010. However, there is an active clean-up program site located at 3200 Santa Rita Road, the current location of Livermore-Pleasanton Fire Station #3. The Project would only involve ground disturbance in areas within the existing roadway, and the location of the closed LUST cleanup site is located outside the area of disturbance. Therefore, potential impacts from hazardous materials would be less than significant.

(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.

A Cultural Resources Technical Report was prepared for the Project by Rincon Consultants in May 2026. These reports were based on a records search of the California Historic Resources Information System (CHRIS), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks, California Points of Historical Interest list, Alameda County Landmarks list, Alameda County Points of Historical Interest list, the Built Environment Resources Directory and the Archaeological Determinations of Eligibility list, as well as a field visit to verify records search findings. The records searches did not identify any historic period built environment resources within or immediately adjacent to the Project site. Therefore, the Project would not result in any significant impacts to historic resources.

CONCLUSION

As stated in CEQA Guidelines Section 15301(c), the key consideration for a project’s compliance with the requirements of the Class I CE is whether the project involves a negligible or no expansion of use of the existing facility. As discussed in the Project Description above, the Project would include the replacement of the existing roadway and the installation of new bicycle and pedestrian improvements. These improvements are consistent with the examples provided in the requirements for a Class I CE specified in Section 15301(c) and would not result in the expanded use of the roadway beyond the existing conditions.

Furthermore, the Project would not meet any of the CE exceptions criteria described in Section 15300.2(b) through (f) of the CEQA guidelines as discussed above. Given this, additional analysis is not warranted, and the Project is categorically exempt from CEQA consistent with the requirements of the Class 1 Existing Facilities CE.

² State Water Resources Control Board. 2026. Geo Tracker Map. Available at: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Pleasanton>. Accessed: July 2, 2026.