

Memorandum

To: DISTRICT DIRECTORS
DEPUTY DISTRICT DIRECTORS, Environmental
DIVISION CHIEF, Local Assistance
DIVISION CHIEF, Transportation Planning

Date: May 14, 2026

From: JEREMY KETCHUM *Jeremy Ketchum*
Chief
Division of Environmental Analysis

Subject: **APPLICABILITY OF NEPA TO PLANNING-ONLY ACTIVITIES FUNDED UNDER THE BIP, RAISE, RCP, SIRC, AND SS4A PROGRAMS**

This memorandum provides clarification regarding the applicability of the National Environmental Policy Act (NEPA) to planning-only activities funded under the Bridge Investment Program (BIP), Rebuilding American Infrastructure with Sustainability and Equity (RAISE), Reconnecting Communities Program (RCP), the Strategic Innovation for Revenue Collection (SIRC), and Safe Streets and Roads for All (SS4A) programs. It is intended to support consistent implementation, oversight, and coordination among grant awardees, Caltrans, and FHWA.

A similar memo was produced by Federal Highway Administration in March of 2026; however, as a NEPA Assignment state, Caltrans must make an independent determination of NEPA applicability.

Planning grants awarded under the above programs are intended to support planning, feasibility, and pre-development activities that inform future transportation investments. These activities may include, but are not limited to:

- Corridor, feasibility, and alternatives studies;
- Conceptual engineering and environmental scoping;
- Safety Action Plans and supplemental safety planning;
- Community reconnection and equity analyses;
- Multimodal, freight, and asset management planning; and
- Data collection, benefit-cost analysis, and public engagement.

Planning activities funded under these programs do not authorize final design, right-of-way acquisition, utility relocation, or permanent construction.

Consistent with 23 CFR §771.117(c)(1), these planning-only activities generally qualify as Categorical Exclusions (CEs), provided that no extraordinary circumstances are present. Such activities:

- Do not involve ground-disturbing work;
- Do not disturb permanent physical improvements;
- Do not commit Federal funds to construction; and
- Do not result in irreversible environmental impacts.

Accordingly, no additional NEPA approval or documentation beyond the attached CE is required for these activities at the planning stage.

Under the SS4A Planning and Demonstration Grant program, some awards may include temporary demonstration activities intended to inform Safety Action Plans. Demonstration activities must:

- Be temporary in nature;
- Not involve permanent roadway reconstruction or capacity expansion; and
- Include evaluation and data collection to inform planning decisions.

Where demonstration activities may have potential environmental effects, coordination with appropriate Caltrans environmental review staff is required to determine whether additional NEPA review is necessary prior to implementation. Any advancement beyond planning, including the following, requires appropriate NEPA approval prior to Federal authorization:

- Final design;
- Right-of-way acquisition;
- Utility relocation;
- Bridge replacement or rehabilitation;
- Roadway reconstruction or capacity expansion; or
- Any permanent physical improvement.

Environmental review and approval must be completed by Caltrans under NEPA Assignment, either through the Division of Local Assistance (DLA) or the appropriate Caltrans District, before authorization of design or construction activities.

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Note that activities that do not result in a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment are not subject to CEQA. The planning-only activities identified do not meet the definition of a project under CEQA.

If you have any questions regarding this approval, please feel free to contact me at (916) 599-1580 or <jeremy.ketchum@dot.ca.gov>.

c: Project Delivery Division Chiefs
Deputy Director, Project Delivery
Deputy Director, Planning and Modal Programs



NEPA CATEGORICAL EXCLUSION DETERMINATION FORM

Project Information

Project Name (if applicable): Planning Activities

DIST-CO-RTE: N/A

PM/PM: N/A

EA: N/A

Federal-Aid Project Number: N/A

Project Description

Caltrans performs various planning-only activities funded under the Bridge Investment Program (BIP), Rebuilding American Infrastructure with Sustainability and Equity (RAISE), Reconnecting Communities Program (RCP), the Strategic Innovation for Revenue Collection (SIRC), and Safe Streets and Roads for All (SS4A) programs.

A memo on the applicability of NEPA for planning-only activities was produced by Federal Highway Administration in March of 2026; however, as a NEPA Assignment state, Caltrans must make an independent determination of NEPA applicability.

These activities do not result in potential for ground-disturbing work, do not disturb permanent physical improvements, do not commit federal funds to construction, and do not result in irreversible environmental impacts.

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)(1)

23 CFR 771.117(d): activity (d)

Activity 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.

Chief, Division of Environmental Analysis

Jeremy Ketchum

Jeremy Ketchum

May 14, 2026

Print Name

Signature

Date