



**U.S. Department of Housing and
Urban Development**

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Washington, DC 20410
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Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5

Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: Oakland Housing Authority Housing Capital Budget 2020-2024 Project Sites

Responsible Entity: City of Oakland

Grant Recipient (if different than Responsible Entity): Oakland Housing Authority

State/Local Identifier: ESX23006

Preparer: Raney Planning and Management, Inc.
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Certifying Officer Name and Title: William Gilchrist, City of Oakland,
Planning and Building Director

Grant Recipient (if different than Responsible Entity): Tom Deloye, OHA Chief Officer of
Real Estate Development

Consultant (if applicable): Raney Planning and Management, Inc.

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Oakland, CA 94612
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hklein@oaklandca.gov

Project Location: Campbell Village
1670 8th Street, Oakland, California 94607
Assessor's Parcel Number (APN): 6-15-1

Lockwood Gardens
1327 65th Avenue, Oakland, California 94621
APN: 41-4054-4

Peralta Village
935 Union Street, Oakland, California 94607
APN: 4-53-4

Harrison Towers
1621 Harrison Street, Oakland, California 94612
APNs: 8-625-23, -24

Adel Court
2001 MacArthur Boulevard, Oakland, California 94602
APN: 23-498-14-1

Palo Vista Gardens
6401 Fenham Street, Oakland, California 94621
APN: 41-4056-1

Foothill Family Apartments
6946 Foothill Boulevard, Oakland, California 94605
APN: 39-3291-17

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed project would consist of seven noncontiguous public housing sites owned by the Oakland Housing Authority (OHA) in the City of Oakland, California (see Figure 1). The locations and surrounding uses of each of the housing sites are described below.

Campbell Village is a 154-unit multi-family residential site that is identified by APN 6-15-1 and is located at 1670 8th Street. Campbell Village is surrounded by single-family residences to the west, across Willow Street; single-family residences and a pre-school to the north, across 10th Street; Prescott Elementary School to the east, across Campbell Street; and multi-family residences and commercial uses to the south, across 8th Street (see Figure 2). According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06001C0066H, effective December 21, 2018, Campbell Village is within Zone X, which is identified as an Area of Minimal Flood Hazard (see Figure 3). Thus, Campbell Village is not located within a special flood hazard zone. In addition, of the seven housing sites, Campbell Village is located closest to the coastal zone boundary (see Figure 4). Campbell Village is considered a Potentially Designated Historic Property by the City of Oakland and has an Oakland Cultural Heritage Survey (OCHS) rating of Fb+3. This rating means that at the time of the OCHS in 1988, the building was less than 45 years old (F) and highly modernized, but if it was brought back to its original condition it likely could be considered a building of Major Importance as it had especially fine architectural or was of major historical importance (b+), but it was not located in a historic district (3). On September 9, 1993, the City of Oakland received a letter from the U.S. Department of Housing and Urban Development (HUD) seeking comments from interested persons concerning the property's eligibility for the National Register per the Section 106 process as HUD was providing federal funding to OHA for the comprehensive redevelopment and modernization of the site.

Figure 1
Regional Vicinity Map

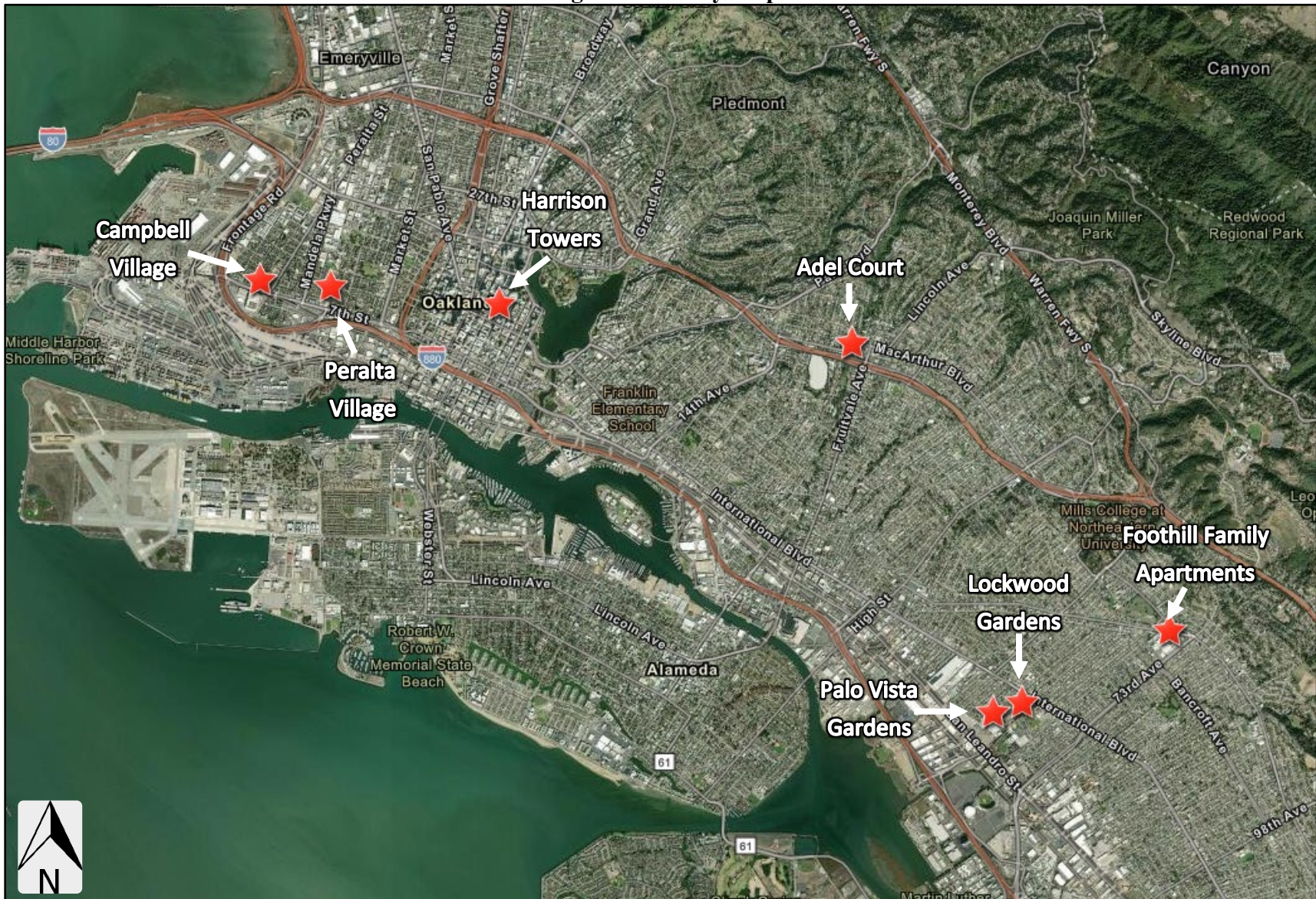


Figure 2
Campbell Village and Lockwood Gardens



Figure 3
FEMA Flood Insurance Rate Map 06001C0066H

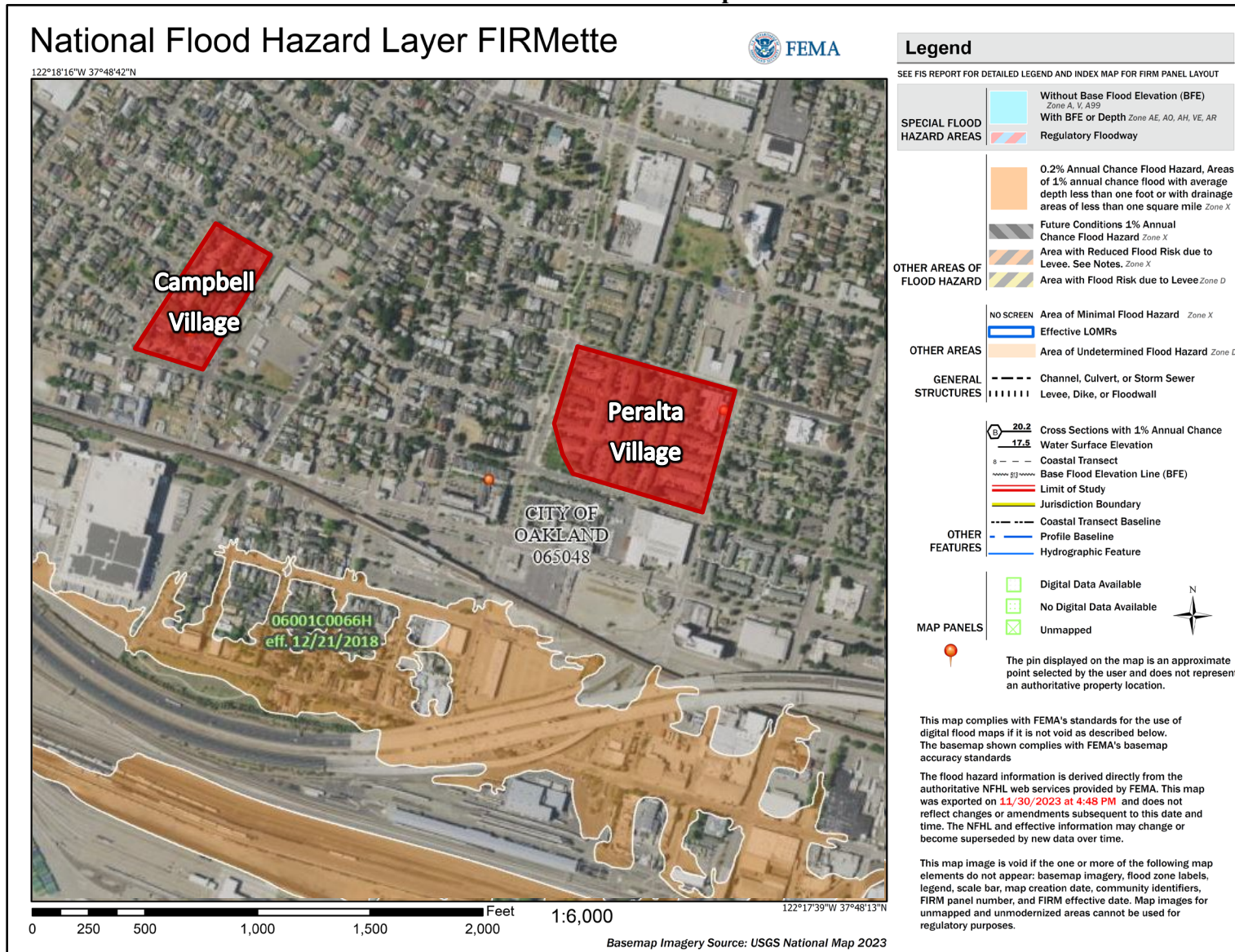


Figure 4
Coastal Zone Boundary



Source: California Department of Fish and Wildlife, BIOS, 2023.

HUD noted that there would be adverse effects of the improvements and recommended mitigations including salvage of materials, a historic display, maintenance of the flat roof design of the admin building, repair and rehabilitation of the property and preservation and maintenance of the corner wood windows and wood and bathroom flooring. These mitigations were endorsed by the Landmarks Preservation Board at their October 18, 1993 meeting. The 1997 Inventory Form indicates a status code of 7, meaning a re-evaluation is needed.

Lockwood Gardens is a 372-unit multi-family residential site that is identified by APN 41-4054-4 and is located at 1327 65th Avenue. Lockwood Gardens is surrounded by single-family residences to the northwest; commercial uses to the north; and multi-family residences to the south, as well as to the southeast, across 65th Avenue (see Figure 2). According to FEMA FIRM 06001C0089H, effective December 21, 2018, Lockwood Gardens is within Zone X, which is identified as an Area of Minimal Flood Hazard (see Figure 5). Lockwood Gardens has an OCHS rating of D3, meaning the site is not considered to be a historic property and is not located in a historic district.

Peralta Village is a 390-unit multi-family residential site that is identified by APN 4-53-4 and is located at 935 Union Street or 1250 8th Street. Peralta Village is surrounded by single-family residences and a commercial use to the west, across Mandela Parkway; multi-family residences and the Cole Middle School to the north; single- and multi-family residences to the east, across Union Street; and multi-family residences and commercial uses to the south, across 8th Street (see Figure 6). According to FEMA FIRM 06001C0066H, effective December 21, 2018, Peralta Village is within Zone X, which is identified as an Area of Minimal Flood Hazard (see Figure 3). Thus, Peralta Village is not located within a special flood hazard zone. Peralta Village does not have an OCHS rating. On September 9, 1993, the City of Oakland received a letter regarding the comprehensive redevelopment of the Peralta Village public housing development as part of federal funding allocated to OHA along with Campbell Village. HUD noted that there would also be adverse effects of the improvements and recommended mitigations including salvage of materials, a historic display, maintenance of the flat roof design of the admin building, repair and rehabilitation of the property and preservation and maintenance of the corner wood windows and wood and bathroom flooring. These mitigations were endorsed by the Landmarks Preservation Board at their October 18, 1993 meeting. In addition, an Inventory Form was prepared in 1990 in connection with the Cypress Freeway replacement after the Loma Prieta earthquake. This form and the accompanying research determined that Peralta Village was eligible for the National Register by consensus of the State Historic Preservation Office (SHPO) and the Federal Highway Administration and was submitted to the National Conference of SHPOs on November 29, 1994.

Harrison Towers is a 101-unit designated senior site identified by APNs 8-625-23, -24, and is located at 1621 Harrison Street. Harrison Towers is surrounded by commercial uses to the west; commercial uses and senior housing to the north; commercial uses and multi-family residences to the east, across Harrison Street; and commercial uses to the south (see Figure 6). According to FEMA FIRM 06001C0067H, effective December 21, 2018, Harrison Towers is within Zone X, which is identified as an Area of Minimal Flood Hazard (see Figure 7). Thus, Harrison Towers is not located within a special flood hazard zone. Harrison Towers has an OCHS rating of F3, and is not considered to be a historic property.

Figure 5
FEMA Flood Insurance Rate Map 06001C0089H

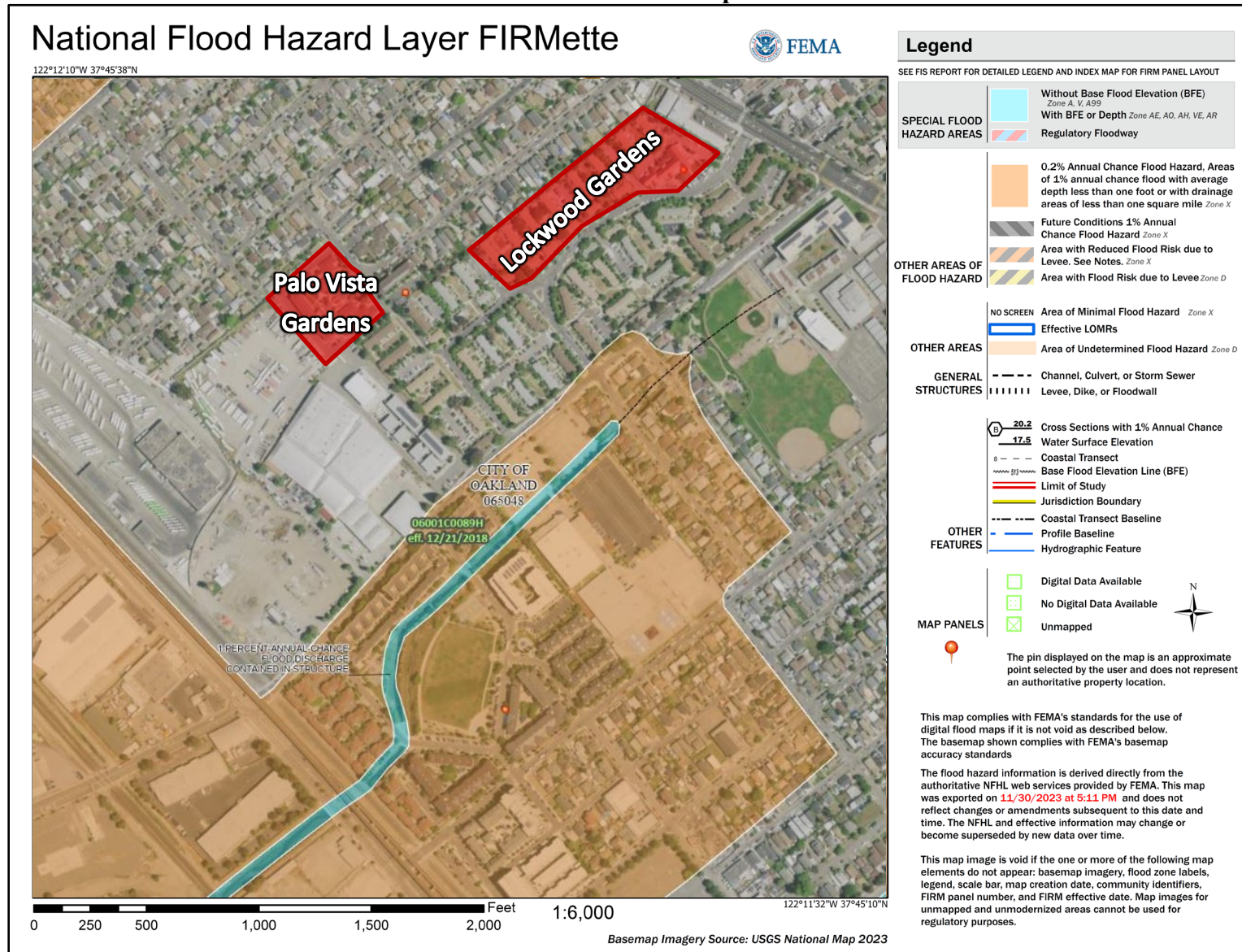


Figure 6
Peralta Village and Harrison Towers

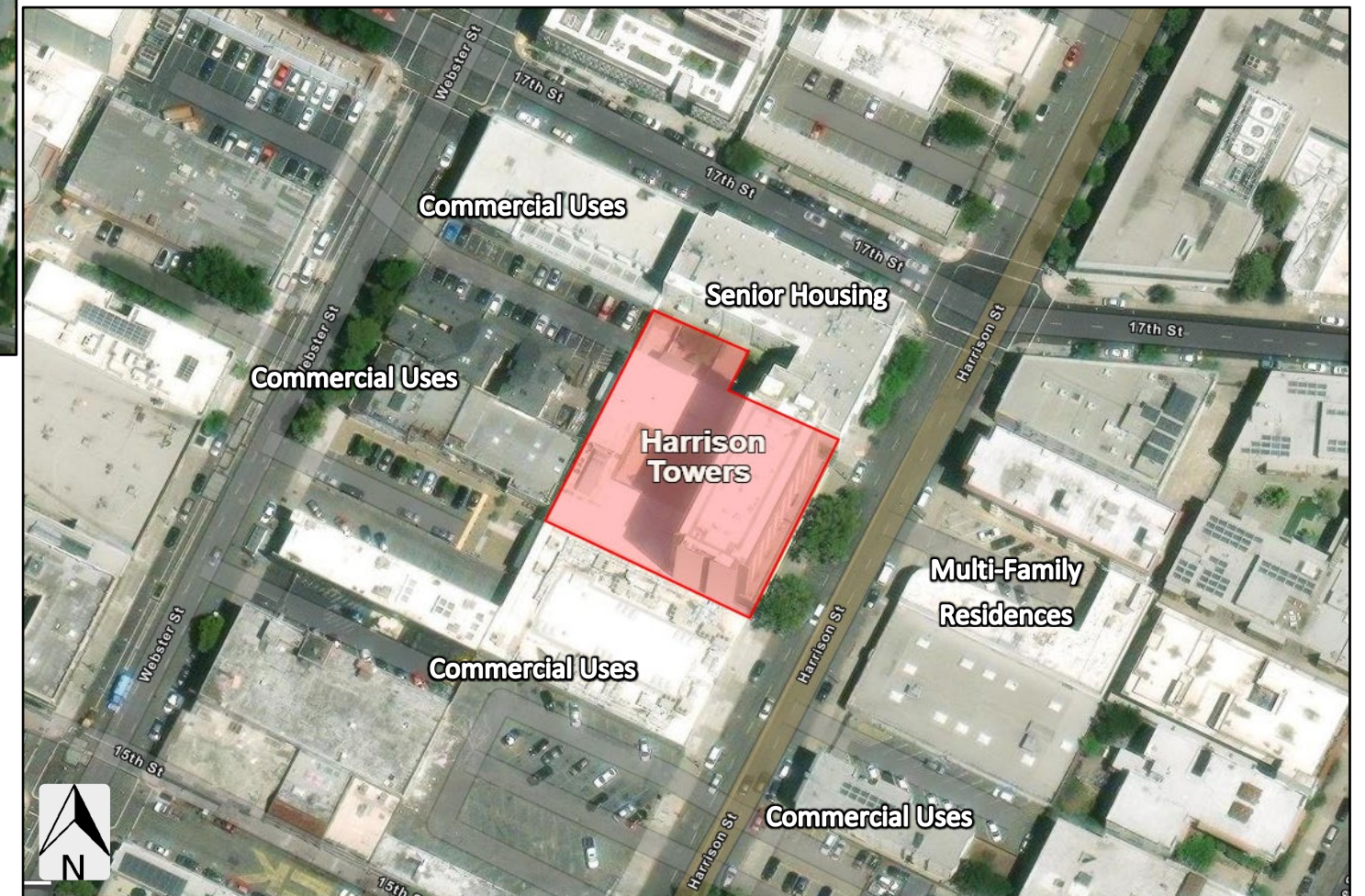
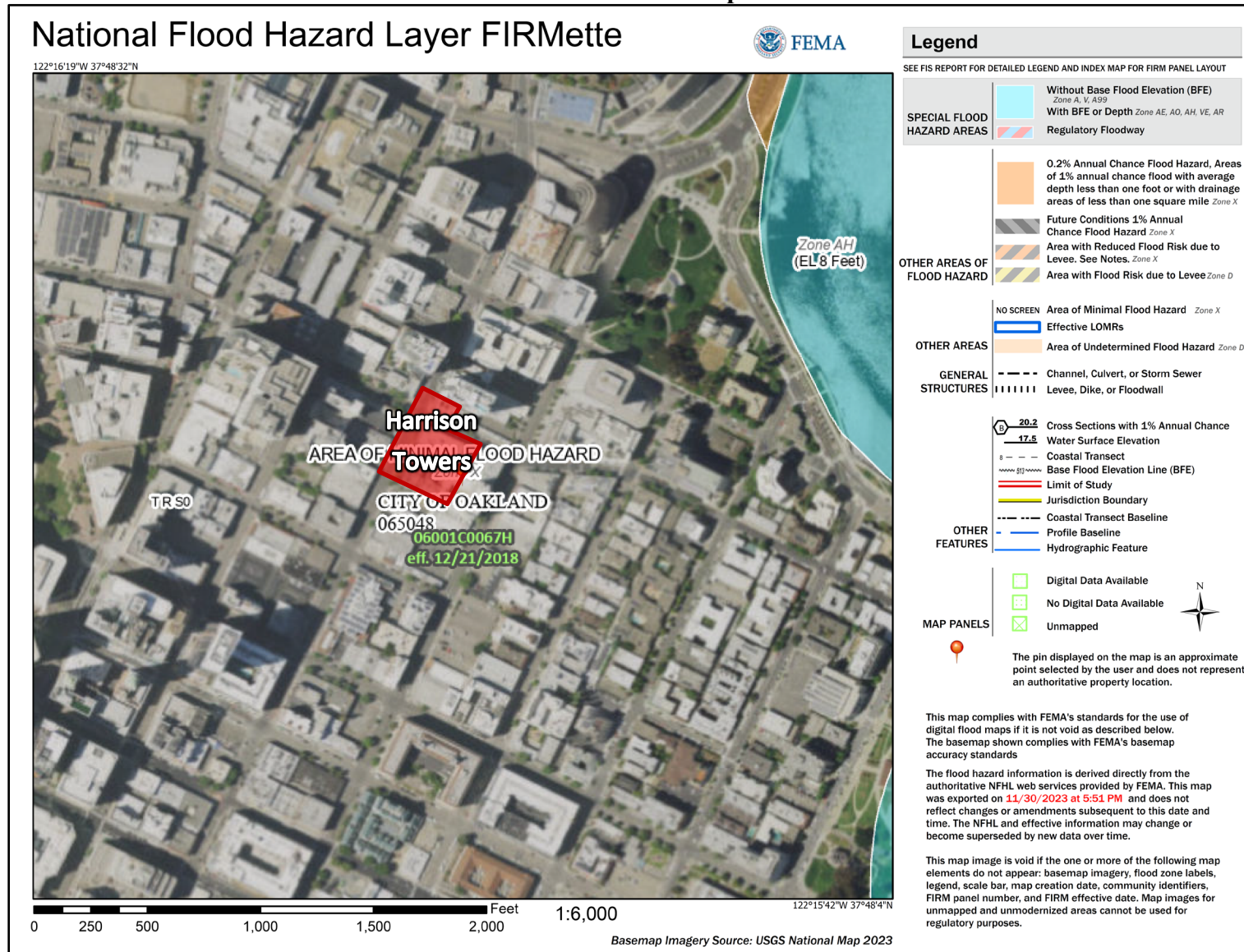


Figure 7
FEMA Flood Insurance Rate Map 06001C0067H



Adel Court is a 30-unit designated senior site identified by APN 23-498-14-1 and is located at 2001 MacArthur Boulevard. Adel Court is surrounded by a commercial use to the west, across Adel Court; commercial uses and single-family residences to the north; commercial uses to the east; and single- and multi-family residences to the south (see Figure 8). According to FEMA FIRM 06001C0087G, effective August 3, 2009, while the majority of Adel Court is within Zone X, which is identified as an Area of Minimal Flood Hazard, a portion of the parcel in which the housing site is located is within Zone A, which is identified as a special flood hazard area (see Figure 9). In addition, Adel Court is located adjacent to a daylit section of Sausal Creek (see Figure 10). Furthermore, of the housing sites, Adel Court is located closest to the nearest wild and scenic river (see Figure 11). Adel Court has an OCHS rating of F3, and is not considered to be a historic property or be located within a historic district.

Palo Vista Gardens is a 100-unit designated senior site identified by APN 41-4056-1 and is located at 6401 Fenham Street. Palo Vista Gardens is surrounded by multi-family residences to the west; single- and multi-family residences to the north; multi-family residences to the east; and industrial uses to the south (see Figure 8). According to FEMA FIRM 06001C0089H, effective December 21, 2018, Palo Vista Gardens is within Zone X, which is identified as an Area of Minimal Flood Hazard (see Figure 5). Thus, Palo Vista Gardens are not located within a special flood hazard zone. In addition, of the housing sites, Palo Vista Gardens is located closest to the nearest airport (see Figure 12) as well as the nearest sole source aquifer (see Figure 13). Palo Vista Gardens has an OCHS rating of D3, and is not considered to be a historic property or be located within a historic district.

Foothill Family Apartments is a 21-unit HOPE VI site identified by APN 39-3291-17 and is located at 6946 Foothill Boulevard. Foothill Family Apartments are surrounded by multi-family residences to the west, across 69th Avenue; single- and multi-family residences to the north; commercial uses and a church to the east; and the Eastmont Town Center to the south, across Foothill Boulevard (see Figure 14). According to FEMA FIRM 06001C0095G, effective August 3, 2009, Foothill Family Apartments is within Zone X, which is identified as an Area of Minimal Flood Hazard (see Figure 15). Thus, Foothill Family Apartments is not located within a special flood hazard zone. In addition, Foothill Family Apartments does not have an OCHS rating and is not considered to be a historic property.

As part of the proposed project, OHA intends to fund various improvements to each of the existing housing sites. A full list of proposed improvements is included as Appendix A to this document.¹ The proposed improvements are intended to preserve and enhance the housing sites by providing cleaner and more energy-efficient utilities and rehabilitating unit interiors. In addition, the proposed project would include only limited ground-disturbing activities related to sewer line replacements and resurfacing parking lots, which would be confined to areas previously disturbed as part of development of the existing structures. Additional improvements proposed as part of the project include the following:

- Installing Wi-Fi and phone infrastructure;
- Installing additional security infrastructure;

¹ Oakland Housing Authority. *Capital Budget 2020-2024*. November 2023.

Figure 8
Adel Court and Palo Vista Gardens



Figure 9
FEMA Flood Insurance Rate Map 06001C0087G

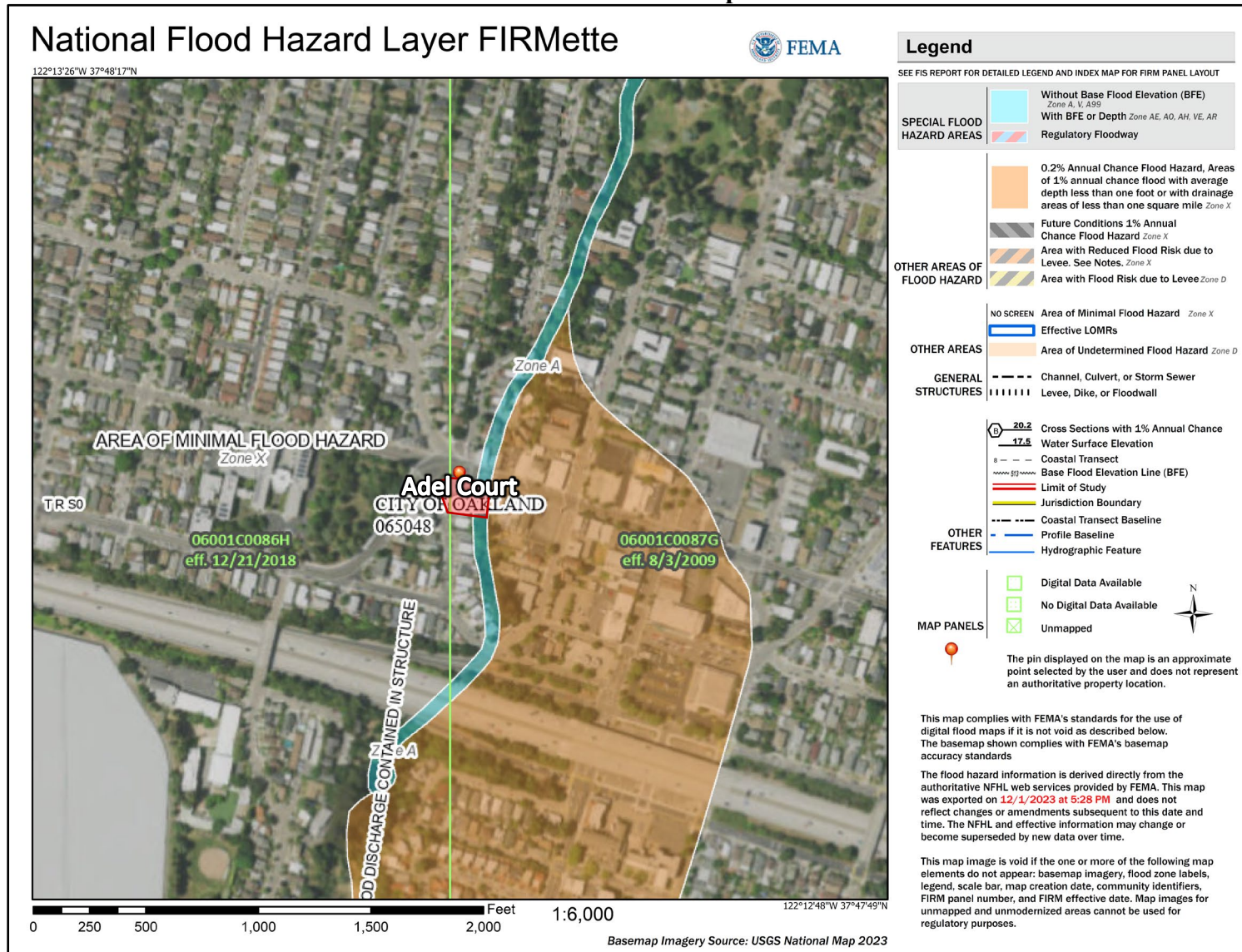
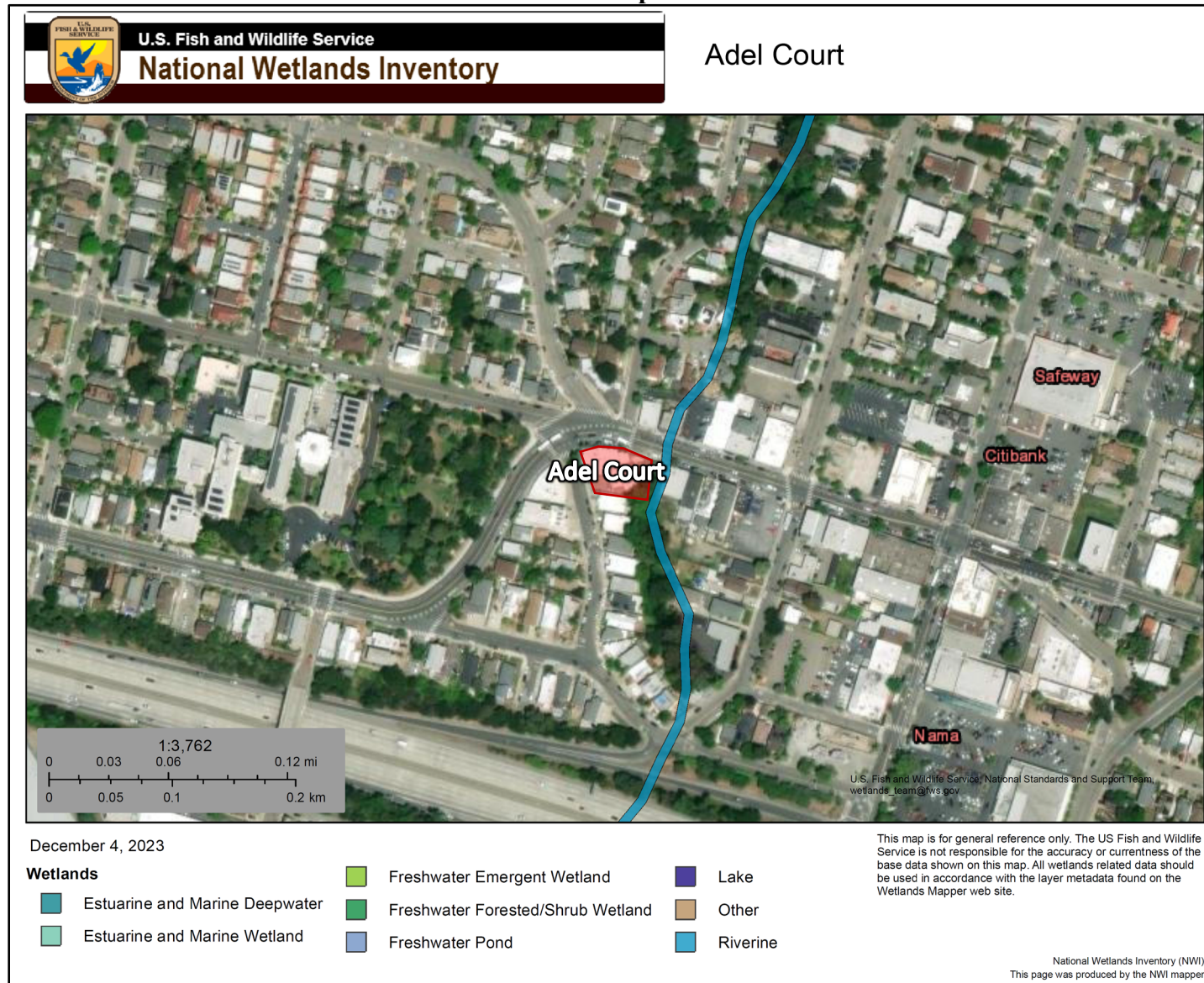
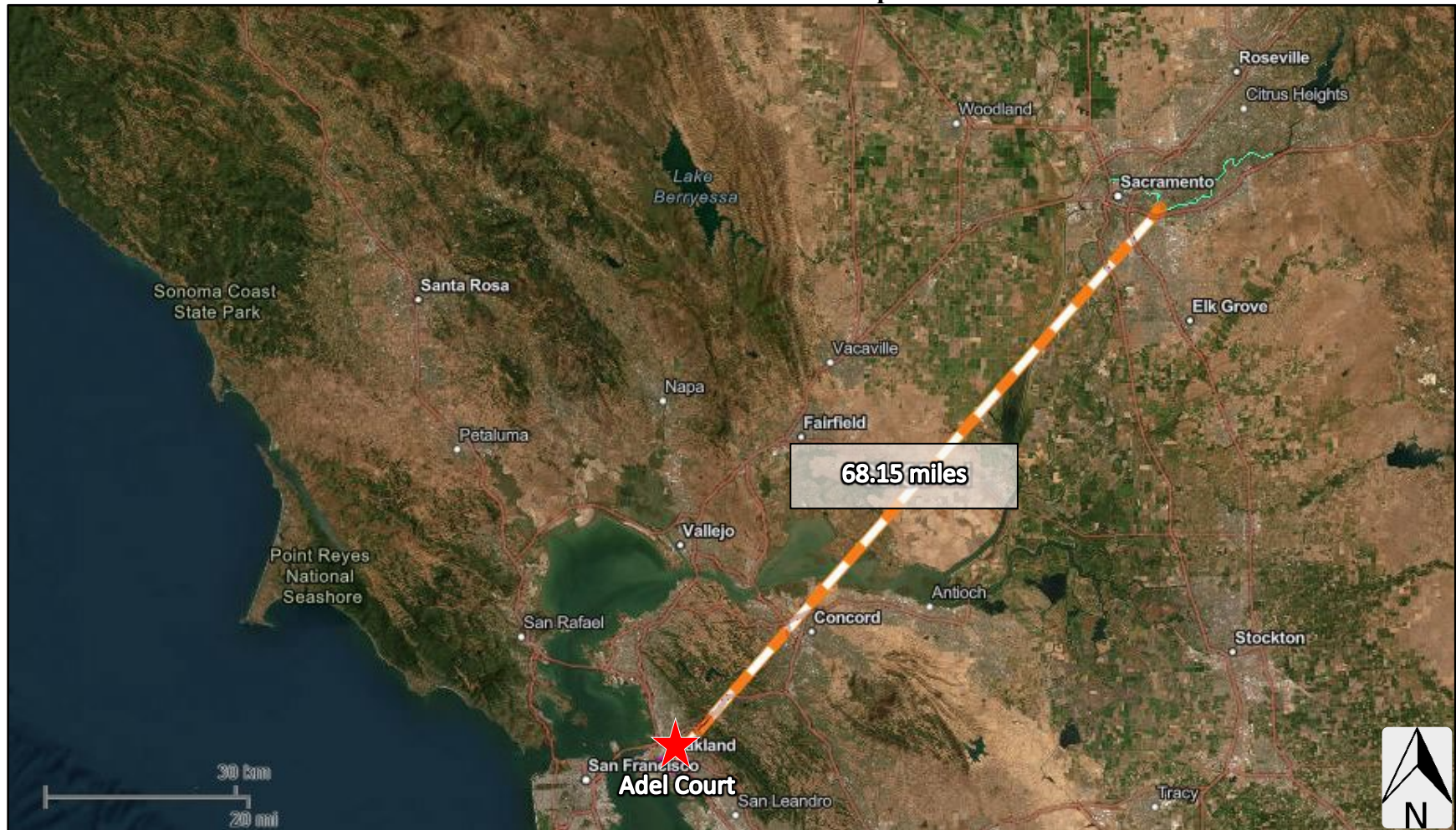


Figure 10
NWI Wetlands Map – Adel Court



National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Figure 11
Wild and Scenic Rivers Map



Source: U.S. Environmental Protection Agency, NEPAassist, 2023.

Figure 12
Nearest Airport to the Project Site

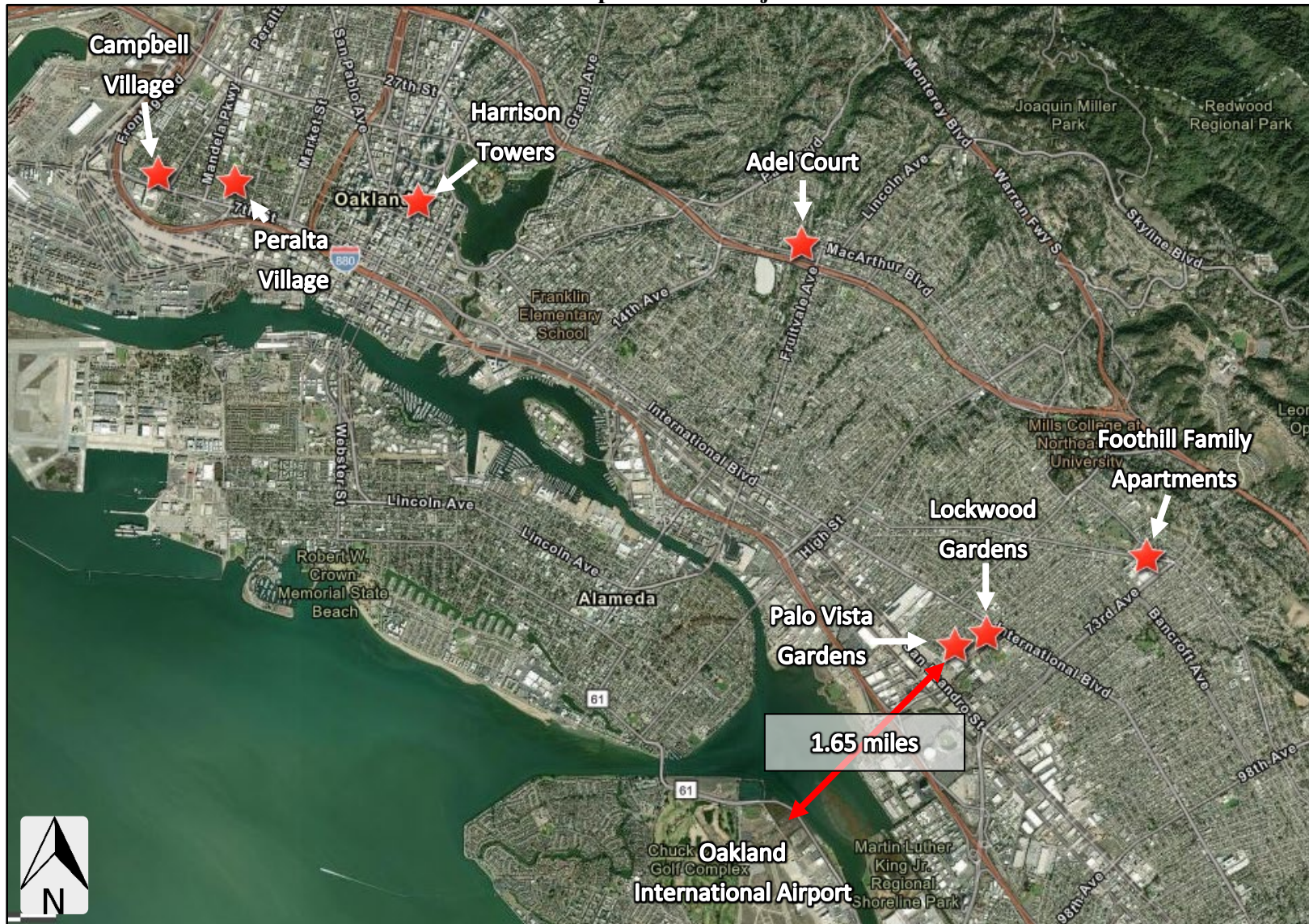
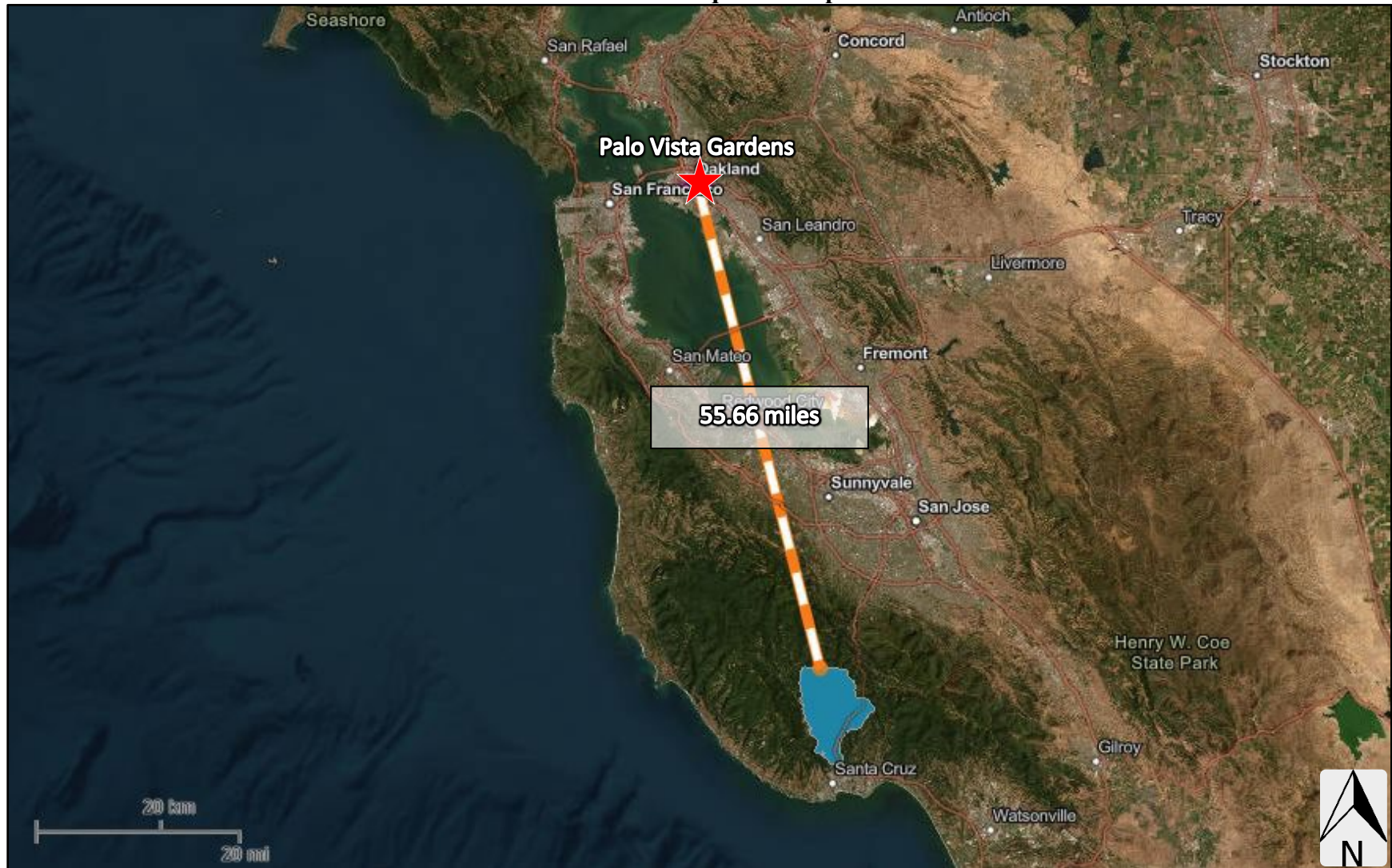


Figure 13
Sole Source Aquifers Map



Source: U.S. Environmental Protection Agency, NEPAassist, 2023.

Figure 14
Foothill Family Apartments

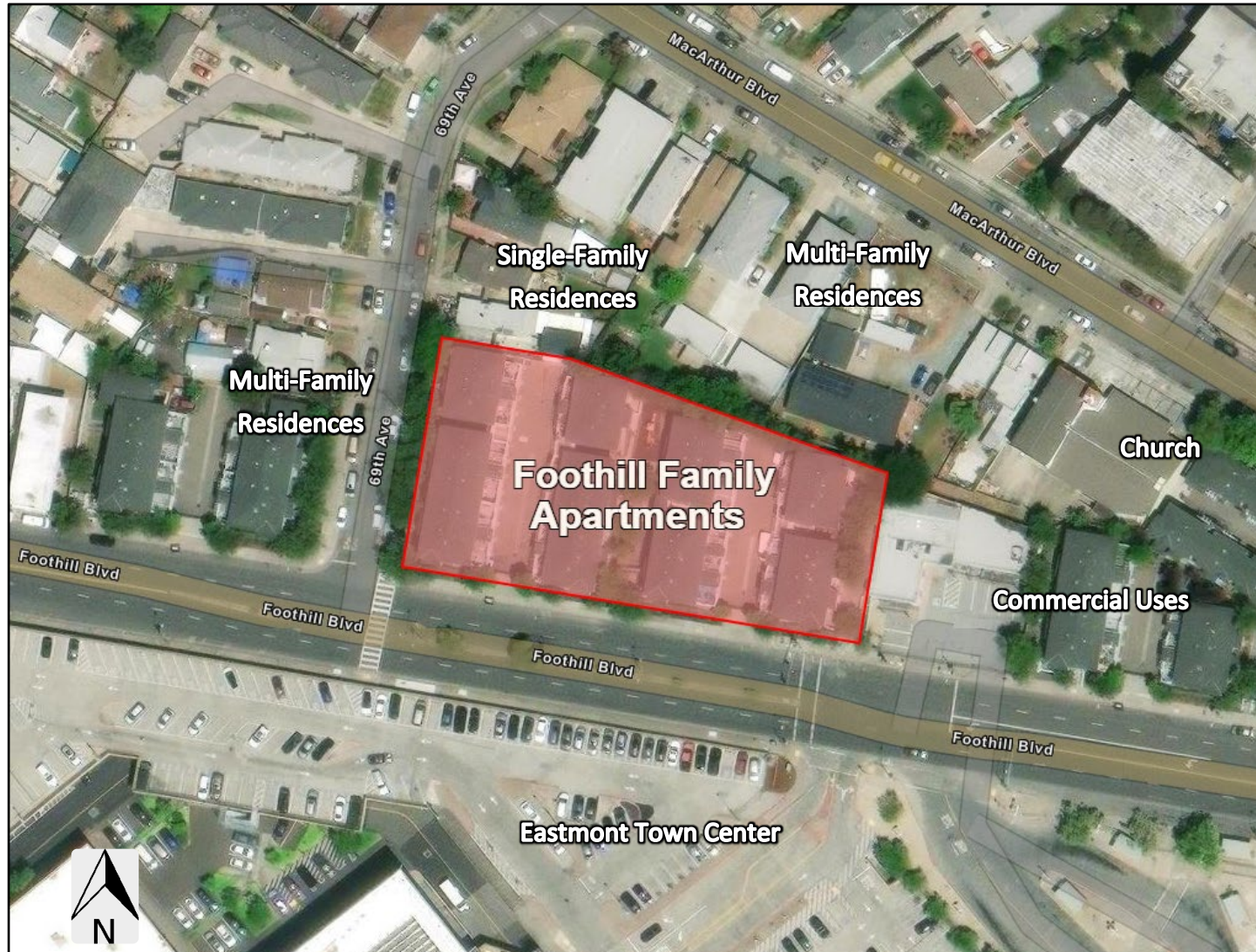
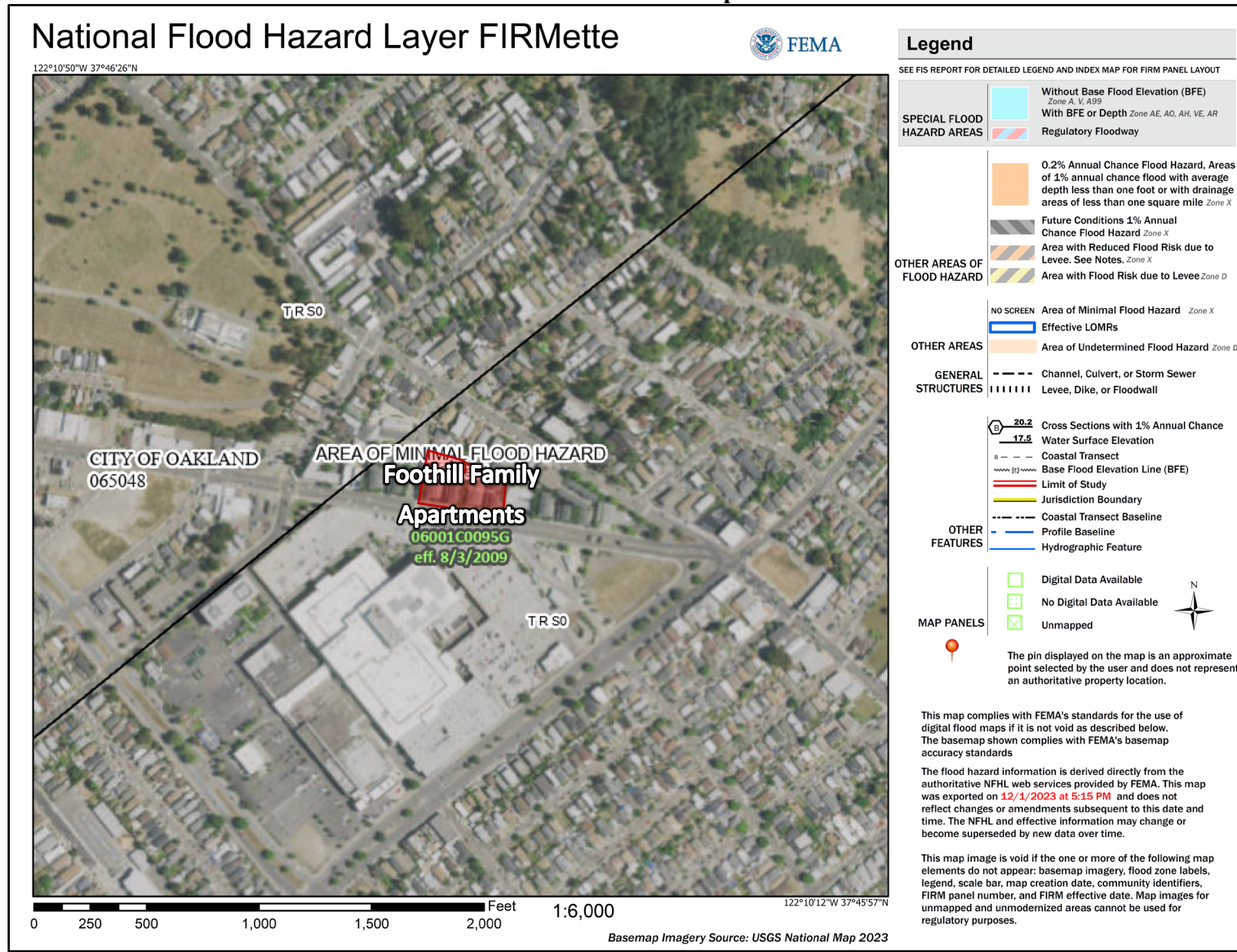


Figure 15
FEMA Flood Insurance Rate Map 06001C0095G



- Replacing windows, roofs, and gutters;
- Replacing bathroom fans, boilers, and heaters;
- Assessing pumps and membranes;
- Repairing elevators;
- Painting exteriors and re-siding replacement and repair;
- Replacement of sewer lines;
- Refurbishing common areas in designated senior sites to be compliant with the Americans with Disabilities Act (ADA);
- Installing and replacing property and building signage;
- Installing site lighting;
- Renovating landscapes and hardscapes;
- Purchase of electric vehicles;
- Resurfacing and restriping parking lots; and
- Renovating playgrounds.
- Vacant unit rehab.
- On-site Wi-Fi, security, server infrastructure.
- ADA improvements.

It is anticipated that approximately 40 units will be assisted as part of the proposed project.

Level of Environmental Review Determination:

The project involves improvements to existing multi-family residential buildings at seven housing sites where the facilities are in place, will be retained without change in size, capacity, or use, and where the estimate cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation, and includes special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons. For the seven housing sites noted above, compliance is achieved at a broad level. As such, a Categorical Exclusion Subject To (CEST) per 24 CFR 58.35(a), and subject to laws and authorities at §58.5 for the seven sites is the appropriate Level of Environmental Review.

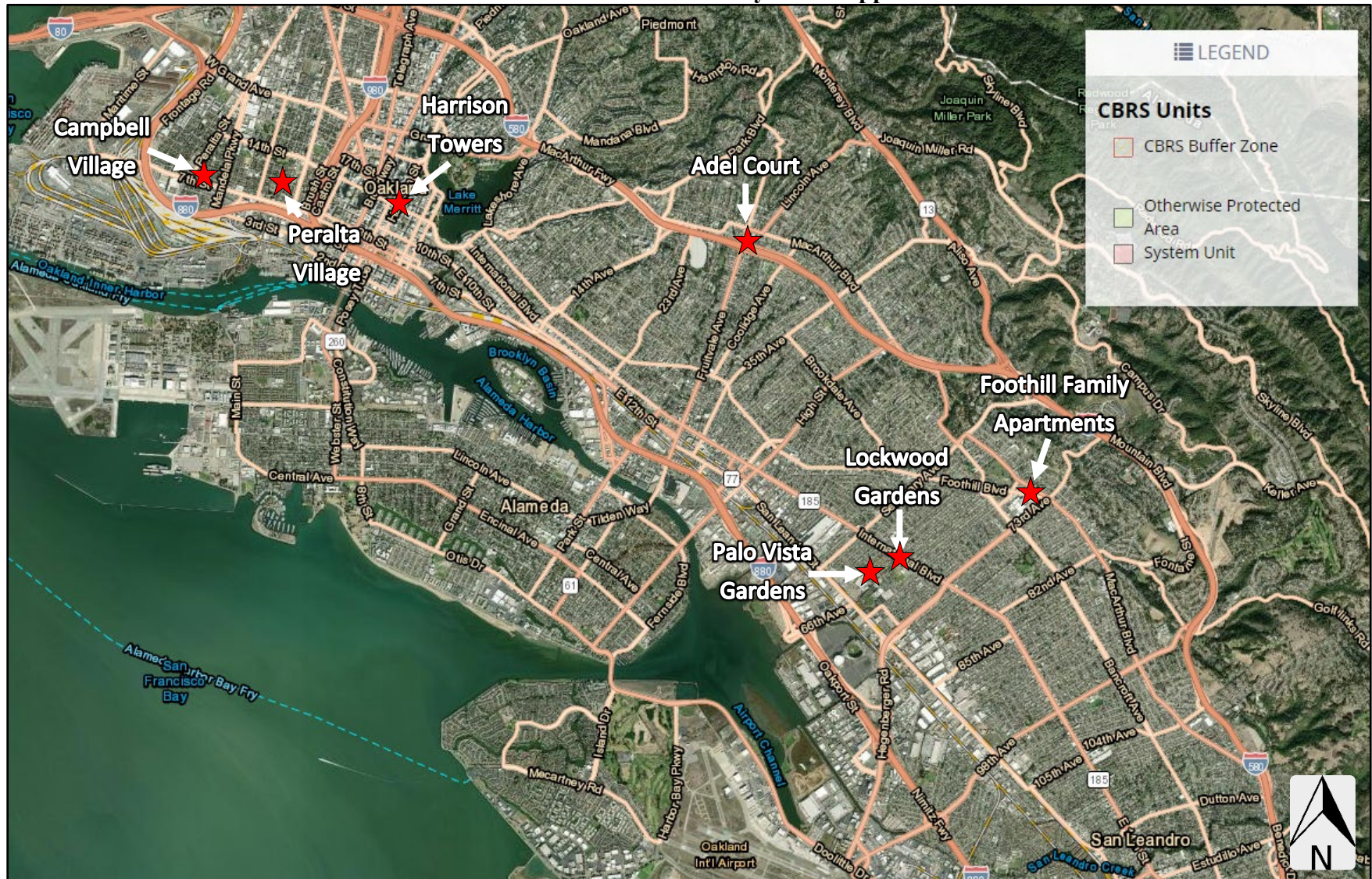
Funding Information

Grant Number	HUD Program	Funding Amount
CA01P003501-20 (FY2020) CA01P003501-21 (FY2021) CA01P003501-22 (FY2022) CA01P003501-23 (FY2023) CA01P003501-24 (FY2024)	FY2020-2024 capital fund grant	\$26,283,693

Estimated Total HUD Funded Amount: \$26,283,693

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$26,283,693

Figure 16
Coastal Barrier Resources System Mapper



Source: U.S. Fish & Wildlife Service, Coastal Barrier Resources System Mapper, 2023.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>HUD's policy is to apply standards to prevent incompatible development around civil airports or military airfields, consistent with Title 24 of the Code of Federal Regulations (CFR), Part 51, Subpart D. Of the seven housing sites, Palo Vista Gardens is located in the closest proximity to an existing airport. As such, the following analysis focuses on the Palo Vista Gardens site. The nearest civilian airport to the Palo Vista Gardens, Oakland International Airport, is located approximately 1.65 miles southwest. Additionally, the nearest military airport, the National Guard Air Base, is located approximately 25.21 miles southeast of the Palo Vista Gardens. Thus, the seven housing sites are not located within 2,500 feet (0.47 miles) of the end of a civilian airport or within 15,000 feet (2.84 miles) of a military airport. Therefore, all seven sites would not be located within an Airport Runway Clear Zone or an Accident Potential Zone, as defined in 24 CFR 51 D, and impacts related to Airport Clear Zones and/or Accidental Potential Zones would not occur.</p> <p><u>Document Citation</u></p> <p>Figure 12, Raney Planning and Management, Inc. <i>ArcGIS Online</i>. November 2023.</p>
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The Coastal Barrier Resources Act (CBRA) of 1982 designated relatively undeveloped coastal barriers along the Atlantic and Gulf coasts as part of the John H. Chafee Coastal Barrier Resources System (CBRS) and made these areas ineligible</p>

<p>Improvement Act of 1990 [16 USC 3501]</p>		<p>for most new federal expenditures and financial assistance. The Coastal Barrier Improvement Act (CBIA) of 1990 reauthorized the CBRA; expanded the CBRS to include undeveloped coastal barriers along the Florida Keys, Great Lakes, Puerto Rico, and U.S. Virgin Islands; and added a new category of coastal barriers to the CBRS called "otherwise protected areas" (OPAs). OPAs are undeveloped coastal barriers that are within the boundaries of an area established under federal, State, or local law, or held by a qualified organization, primarily for wildlife refuge, sanctuary, recreational, or natural resource conservation purposes.</p> <p>Every housing site included as part of the proposed project is located in HUD Region IX. Designated coastal barrier resources do not occur in HUD Region IX. Therefore, the proposed project would not conflict with either the CBRA or CBIA.</p> <p><u>Document Citation</u></p> <p>Figure 16, U.S. Fish & Wildlife Service. <i>Coastal Barrier Resources Act</i>. Available at: https://www.fws.gov/program/coastal-barrier-resources-act. Accessed December 2023. (Appendix D).</p>
<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Flood Disaster Protection Act of 1973 (42 USC 4012a) requires that projects receiving federal assistance and located in an area identified by FEMA as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program.</p> <p>As shown Figure 3, Figure 5, Figure 7, Figure 9, and Figure 15, six of the seven housing sites are located in an Area of Minimal Flood Hazard. As shown in Figure 9, according to FEMA FIRM 06001C0087G, effective August 3, 2009, while the majority of Adel Court is within Zone X, which is identified as an Area of Minimal Flood Hazard, a portion of the housing site is located within Zone A, which is identified as a SFHA.</p> <p>Adel Court is located within a parcel that overlaps with a SFHA; a very limited building area is within the SFHA (see Figure 9). The only exterior improvements to Adel Court funded by the proposed project would include roof replacement,</p>

		<p>external siding and common area improvements, landscaping improvements on the western and northern site boundaries where existing landscaping is present, and the resurfacing of the existing parking lot; not only would such improvements not constitute ground disturbance, but resurfacing of the existing parking lot would improve drainage of the site. In addition, the parking lot proposed for improvement is located on the opposite side of the existing residential structures from the SFHA.</p> <p>In addition, as discussed in the Floodplain Management section of this CEST, the proposed project has completed the 8-Step Process for complying with the floodplain management requirements set forth by 24 CFR 55.20.</p> <p>Overall, the proposed project would not introduce new structures or people into a SFHA. Nonetheless, flood insurance has been established for the Adel Court site. Based on the above, impacts related to the Flood Disaster Protection Act and National Flood Insurance Reform Act of 1994 would not occur.</p> <p><u>Document Citation</u></p> <p>Figure 3, Figure 5, Figure 7, Figure 9, and Figure 15, Federal Emergency Management Agency. <i>FEMA's National Flood Hazard Layer (NFHL) Viewer</i>. Available at: https://www.fema.gov/flood-maps/national-flood-hazard-layer. Accessed November 2023. (Appendix D).</p> <p>Raney Planning & Management, Inc. <i>Floodplain Management Determination Step 3: Alternative Site Analysis</i>. February 2025. (Appendix C).</p> <p>Philadelphia Insurance Companies. <i>Flood Insurance Policy Packet</i>. May 2025. (Appendix D).</p>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Clean Air Act was implemented to remedy the damaging effects that bad air quality can have on human health and the environment and was most recently revised in 1990, when major changes were enacted. The Clean Air Act is</p>

		<p>administered by the U.S. Environmental Protection Agency (USEPA), which sets National Ambient Air Quality Standards (NAAQS). NAAQS are limits on certain “criteria” air pollutants, including limits on how much of the pollutants can be in the air anywhere in the U.S. Geographic areas that are in compliance with the NAAQS are called “attainment areas,” while areas that do not meet the standards are called “nonattainment” areas.</p> <p>The housing sites are located in the San Francisco Bay Area Air Basin (SFBAAB) under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The SFBAAB is designated as a nonattainment area for the federal 8-hour ozone (O₃) standard and the federal fine particulate matter (PM_{2.5}) standard, and a maintenance area for the federal carbon monoxide (CO) standard. The SFBAAB is designated as in attainment or unclassified for all other federal criteria pollutants.</p> <p>Pursuant to the guidelines set forth by HUD, because the housing sites are located in a nonattainment area for O₃ and PM_{2.5}, and a maintenance area for CO, conformity with the State Implementation Plan (SIP) must be demonstrated. The SFBAAB portion of the SIP approved by the EPA comprises the BAAQMD air quality plans, including the 2001 Ozone Attainment Plan, 2005 Bay Area Ozone Strategy, 2010 Clean Air Plan, and 2017 Clean Air Plan. A project is shown to conform with the SIP if its criteria pollutant emissions remain below the local air district’s significance thresholds and are consistent with the BAAQMD air quality plans. The federal <i>de minimis</i> threshold is 100 tons per year for each criteria pollutant.</p> <p>The BAAQMD Guidelines establish screening criteria for criteria air pollutants and precursors which provide a conservative indication of whether implementing a proposed project could result in potentially significant impacts. A project that does not exceed the screening level and meets the screening parameters would be considered to result in emissions below the thresholds of significance and would, thus, result in less-than-significant impacts on air quality.</p>
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		<p>The proposed project would be limited to improvements such as interior renovations, upgrading security, Wi-Fi and phone infrastructure, replacing windows roofs and gutters; exterior painting and siding repair, sewer repair, ADA improvements, lighting and signage, renovation of hardscapes, parking lots, landscapes and playgrounds.</p> <p>Pursuant to Section 4.1.1, Construction Criteria, of the BAAQMD CEQA Air Quality Guidelines, because the proposed project would be below the applicable screening size of 416 new multi-family residential units, would include best management practices (BMPs), would not include demolition or the simultaneous occurrence of two or more construction phases, involve extensive site preparation such as grading or cut and fill, material transport, or stationary sources such as generators, the proposed project would result in a less-than-significant impact related to criteria air pollutants and precursors, and an increase in operational emissions would not occur. Therefore, the proposed project would not result in any adverse effects related to construction and operational emissions.</p> <p>Based on the above, the proposed project would be consistent with HUD Policy and impacts to the Clean Air Act would not occur.</p> <p><u>Document Citation</u></p> <p>Bay Area Air Quality Management District. <i>2022 California Environmental Quality Act Guidelines</i>. April 2023. (Appendix D).</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Coastal Zone Management Act Section 1453, Definitions, defines the term “coastal zone” as “...the coastal waters (including the lands therein and thereunder) and the adjacent shorelands (including the waters therein and thereunder), strongly influenced by each other and in proximity to the shorelines of the several coastal states, and includes islands, transitional and intertidal areas, salt marshes, wetlands, and beaches...” and extending “...inland from the shorelines only to the extent necessary to control shorelands, the uses of which have a direct and significant impact on the coastal waters, and to control those geographical areas which are likely to be affected by or vulnerable to sea level rise.”</p>

		<p>The housing sites are located in Alameda County, located in the East Bay of the San Francisco Bay Area. The San Francisco Bay Conservation and Development Commission (BCDC) developed the San Francisco Bay Plan (Plan), which is intended to protect and conserve the San Francisco Bay (Bay) as a regional resource and single body of water. The Plan guides the uses of the Bay and shoreline. A permit is necessary prior to the undertaking of new work in the Bay or within 100 feet of the shoreline, including filling, dredging, dredged sediment disposal, shoreline development, and other work.</p> <p>As shown in Figure 4, Campbell Village, which is the housing site located closest to the Coastal Zone Boundary, is still outside of the Boundary. Additionally, the proposed project would only include limited ground-disturbing activities which would be confined to areas previously disturbed as part of development of the existing structures. Therefore, the proposed project would not affect a Coastal Zone, and impacts related to the Coastal Zone Management Act would not occur.</p> <p><u>Document Citation</u></p> <p>Figure 4, California Department of Fish and Wildlife. <i>California Department of Fish and Wildlife BIOS</i>. Available at: https://apps.wildlife.ca.gov/bios6/. Accessed December 2023. (Appendix D).</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD policy, as described in Section 50.3(i) and Section 58.5(i)(2), states the following:</p> <p>(1)... all property proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gasses, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property.</p> <p>(2) HUD environmental review of multifamily and non-residential properties shall include evaluation of previous uses of the site and other evidence of contamination on or near the site, to assure that occupants of proposed sites are not adversely affected by the hazards.</p> <p>(3) Particular attention should be given to any proposed site on or in the general proximity of</p>

		<p>such areas as dumps, landfills, industrial sites, or other locations that contain, or may have contained, hazardous wastes.</p> <p>(4) The responsible entity shall use current techniques by qualified professionals to undertake investigations determined necessary...</p> <p>Sites known or suspected to be contaminated by toxic chemicals or radioactive materials include, but are not limited to, sites: (i) listed on an Environmental Protection Agency (EPA) Superfund National Priorities or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) List, or equivalent State list; (ii) located within 3,000 feet of a toxic or solid waste landfill site; or (iii) with an underground storage tank (UST) (which is not a residential fuel tank).</p> <p>In order to determine if the housing sites are listed as release sites, or are located in the vicinity of a known release site, a review of the State Water Resource Control Board (SWRCB) GeoTracker database and the Department of Toxic Substances Control (DTSC) EnviroStor database was conducted for each housing site. None of the housing sites proposed for improvement are listed on the DTSC EnviroStor database. However, the following leaking UST (LUST) sites have been identified by the SWRCB Geotracker database on or within the proximity of the housing sites:</p> <ul style="list-style-type: none"> • ARCO at 6415 International Boulevard (closed); • Pacific Electric Motor at 1009 66th Avenue; • OHA at 935 Union Street (closed); • Douglas Parking Company at 1721 Webster Street (closed); • Chevron at 1633 Harrison Street (closed); • Eastshore Lines, Inc. at 2400 Adeline Street (closed); • Ned Clyde Construction at 2311 Adeline Street (closed); • Aervoe Pacific at 2528 Adeline Street (closed); • Cal West Periodicals at 2400 Filbert Street (closed); • Reliable Handi Cab at 1520 7th Street (closed); • Trucker's Friend at 1395 7th Street;
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		<ul style="list-style-type: none"> • Kelly's Truck Repair at 1390 7th Street (closed); • Armored Transport at 1333 8th Street (closed); • Better Homes Realty at 6821 Foothill Boulevard (closed); • City of Oakland Fire Station #23 at 7100 Foothill Boulevard (closed); • Acts Full Gospel Church at 1034 66th Street (closed); • Silva Association Roofing at 814 69th Avenue (closed); and • Unocal #3135 at 845 66th Avenue (closed). <p>With the exception of the OHA site located within Peralta Village and the Chevron site located within the Harrison Towers, all of the LUST sites listed above are not located within the housing site boundaries; those LUST sites which do occur within a housing site are fully remediated, and, thus, are closed. Furthermore, none of the proposed improvements would include activities that would extend beyond the boundaries of the housing sites, and the proposed project would not alter the existing residential uses of the housing sites. Therefore, the proposed project would not have potential for exacerbating any existing hazardous condition that occurs in the project vicinity.</p> <p>Campbell Village and Lockwood Gardens were constructed prior to 1978; the five remaining housing sites proposed for improvement may have been built prior to 1978, and, thus, asbestos-containing materials (ACMs) and lead-based paint (LBP) may be present on all housing sites. To the extent that the housing sites contain ACMs and/or LBP, work within those sites would be required to comply with all applicable regulations set forth by the California Division of Occupational Safety and Health (Cal/OSHA) in California Code of Regulations (CCR) Title 8, Section 1532.1. The regulations contain requirements for lead air monitoring, work practices, respiratory protection, etc. that are triggered by the presence of any detected levels of lead. Compliance with such regulations related to the monitoring of ACMs is codified in Section 15.16.050(B)(9) of the City's Municipal Code.</p>
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		<p>To ensure that proper procedures are implemented in case ACMs are detected within Campbell Village or Lockwood Gardens and that potential effects related to exposure to ACMs would not occur, Mitigation Measure 1 would be required.</p> <p>In addition, for those housing sites containing structures built prior to 1978, as established in Article XIII, Lead Hazard Control and Abatement, of the City's Municipal Code, the City would require that the project applicant obtain an LBP Abatement Permit and comply with the conditions established therein. Such conditions include that renovation, repair, and painting projects that disturb LBP in buildings constructed prior to 1978 must be performed by firms certified by the USEPA or certified renovators who are trained by USEPA-approved training providers and follow lead-safe work practices. Additionally, pursuant to Article XIII, Lead Hazard Control and Abatement, of the City's Municipal Code, a Lead Abatement Work Plan prepared as part of the LBP Abatement Permit would be required to include a description of the method that will be used to reduce the hazard, a plan to contain LBP during construction activities, the disposal method for lead-containing substances, the firm performing the work, and any other information requested by the City of Oakland Planning and Building Department. Compliance with the aforementioned requirements, including the regulations established by 8 CCR 1532.1, would be enforced through the City's building permit process. Based on the above, through compliance with 8 CCR 1532.1 and the provisions established by the City's LBP Abatement Permit, potential effects related to exposure to LBPs would not occur.</p> <p>In accordance with HUD requirements for scientific data review, the Department of Health and Human Services, Centers for Disease Control and Prevention (CDC), National Environmental Public Health Tracking Network Data Explorer was reviewed for radon testing data for the County in which the project is located, which is the smallest area for which data are available, over the most recent 10-year period.</p>
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		<p>The project site is located in Alameda County. The CDC radon data shows that 290 tests have been conducted during the most recent reported 10-year period (2008 through 2017). The average result of the 290 tests completed in Alameda County is 1.9 picocuries per liter (pCi/L) with the median level being 0.7 pCi/L. Pursuant to HUD protocols, the average radon level ascertained from the review is assumed to be the level within any particular buildings that are part of the proposed project. Therefore, radon levels for the project are assumed to be below the EPA action level, and mitigation is not required. Furthermore, local jurisdictional testing requirements stricter than HUD's requirements stated in CPD-23-103, which requires a notice of considering and reviewing radon levels, do not exist. The notice requirements have been completed and radon levels are below HUD's four pCi/L threshold. Further consideration of radon is not required in this environmental review.</p> <p>With implementation of Mitigation Measure 1, the proposed project would be consistent with HUD policy, as described in 24 CFR Part 50.3(i) and 24 CFR 58.5(i)(2), and the project would not result in impacts related to contamination and toxic substances.</p> <p><i>Mitigation Measure 1: Prior to approval of any Improvement Plans, the project applicant shall retain a qualified asbestos inspector who shall complete a Baseline Asbestos Survey or a Pre-Construction Survey of the properties to determine if asbestos is present at the sites per the ASTM E 2356-18, "Standard Practice for Comprehensive Building Asbestos Surveys." If the survey shows asbestos, then the applicant shall submit an O&M program for protection of workers and residents. The project applicant shall also comply with all applicable laws and regulations regarding demolition and renovation of Asbestos Containing Materials (ACM), including, but not limited to, California Code of Regulations, Title 8; California Business and Professions Code, Division 3; California Health and Safety Code sections 25915-25919.7; and Bay Area Air Quality Management District, Regulation 11, Rule 2, as may be amended. Evidence of compliance shall be submitted to the City upon request.</i></p>
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		<p><u>Document Citation</u></p> <p>State Water Resources Control Board. <i>GeoTracker</i>. Available at: https://geotracker.waterboards.ca.gov/. Accessed December 2023. (Appendix D).</p> <p>State Water Resources Control Board. <i>GeoTracker – Chevron #9-0020</i>. Available at: https://geotracker.waterboards.ca.gov/case_summary?global_id=T0600100304. Accessed February 2025. (Appendix D).</p> <p>State Water Resources Control Board. <i>GeoTracker – Oakland City of Housing Authority (T0600100378)</i>. Available at: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600100378. Accessed December 2023. (Appendix D).</p> <p>California Department of Toxic Substances Control. <i>EnviroStor</i>. Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed December 2023. (Appendix D).</p> <p>City of Oakland. <i>Oakland Municipal Code, Section 15.16.050(B)(9) Cleanup, debris removal, and foundation removal standards</i>. Available at: https://library.municode.com/ca/oakland/codes/code_of_ordinances?nodeId=TIT15BUCO_CH15.16FIMAARPRIMRE_15.16.050CLDEREFOR EST. Accessed December 2023. (Appendix D).</p> <p>City of Oakland. <i>Oakland Municipal Code, Article XIII. Lead Hazard Control and Abatement</i>. Available at: https://library.municode.com/ca/oakland/codes/code_of_ordinances?nodeId=TIT15BUCO_CH15.08OABUMACO_ARTXSUPUNUBU_15.08.340SUBUHS17920.3. Accessed December 2023. (Appendix D).</p> <p>Centers for Disease Control and Prevention. <i>National Environmental Public Health Tracking Network</i>. Available at: https://ephtracking.cdc.gov/DataExplorer/?c=31&i=141&m=-1. Accessed February 2025. (Appendix D).</p>
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<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Endangered Species Act of 1973, as amended, and its implementing regulations are designed to protect and recover species in danger of extinction and the ecosystems that they depend upon. When passed, the Endangered Species Act spoke specifically to the value – tangible and intangible – of conserving species for future generations. In passing the Endangered Species Act, Congress recognized a key fact that subsequent scientific understanding has only confirmed: the best way to protect species is to conserve their habitat.</p> <p>According to HUD guidance, the environmental review of a proposed project must consider potential impacts to endangered and threatened species and critical habitats. A No Effect determination can be made if none of the activities involved in the project have potential to affect species or habitats.</p> <p>The USFWS offers consultation on threatened and endangered wildlife and plant species, as well as critical habitats, on a project-by-project basis. According to the USFWS Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC), the housing sites do not contain critical habitat. The project sites are already developed with structures and landscaping. Although the proposed project would include minor ground disturbance related to sewer line replacement and hardscape and landscape renovations, such activities would only occur in areas that have been previously subject to substantial ground disturbance.</p> <p>However, as discussed above, improvements to Adel Court and Lockwood Gardens would include landscaping, which could involve trimming or removal of existing trees. Various migratory birds and nesting raptors could potentially nest in the existing trees that could be impacted by the proposed project. Such species are protected under the Migratory Bird Treaty Act of 1918 (MBTA). The MBTA prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior. During the proposed landscaping activities, various migratory birds and raptors could potentially nest in the existing trees and other vegetation. Without proper</p>
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		<p>mitigation, the proposed improvements to Adel Court and Lockwood Gardens could result in impacts to species protected by the MBTA. Protected bat species also have the potential to be disturbed during landscaping activities. Therefore, Mitigation Measures 2 and 3 shall be required, which would include measures to avoid or minimize impacts to migratory bird and/or raptor species protected by the MBTA and protected bat species, respectively.</p> <p>Implementation of Mitigation Measures 2 and 3 would ensure potentially substantial adverse effects related to species and habitat protected under the Endangered Species Act would not occur.</p> <p><i><u>Mitigation Measure 2:</u> To avoid and minimize impacts on special-status roosting bats in trees, the project applicant shall comply with the following requirements:</i></p> <ul style="list-style-type: none"> <i>a) A qualified biologist (as defined by California Department of Fish and Wildlife) who is experienced with bat surveying techniques (including auditory sampling methods), behavior, and roosting habitat shall conduct a pre-construction habitat assessment of the subject tree to characterize potential bat habitat and identify potentially active roost sites.</i> <i>b) Trees with potential bat roosting habitat or active bat roost sites shall follow a two-step removal process which shall occur outside of the bat maternity roosting season and period of winter torpor (April 15 to August 15, and October 15 to March 1).</i> <i>c) On the first day and under supervision of the qualified biologist, tree branches and limbs not containing cavities or fissures in which bats could roost shall be cut using chainsaws or other handheld equipment.</i> <i>d) On the following day and under the supervision of the qualified biologist, the remainder of the tree may be trimmed or removed, either using chainsaws or other equipment (e.g., excavator or backhoe).</i> <i>e) All felled trees shall remain on the ground for at least 24 hours prior to</i>
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		<p><i>chipping, off-site removal, or other processing to allow any bats to escape, or be inspected once felled by the qualified biologist to ensure no bats remain within the tree and/or branches. The tree will be removed on or after the third day.</i></p> <p><i>Evidence of compliance shall be submitted to the City upon request.</i></p> <p><u><i>Mitigation Measure 3:</i></u> <i>To the extent feasible, removal of any tree and/or other vegetation suitable for nesting of birds shall not occur during the bird breeding season of February 1 to August 15 (or during December 15 to August 15 for trees located in or near marsh, wetland, or aquatic habitats). If tree removal must occur during the bird breeding season, all trees to be removed shall be surveyed by a qualified biologist to verify the presence or absence of nesting raptors or other birds. Pre-removal surveys shall be conducted within 15 days prior to the start of work and shall be submitted to the City for review and approval. If the survey indicates the potential presence of nesting raptors or other birds, the biologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the nest buffer will be determined by the biologist in consultation with the California Department of Fish and Wildlife, and will be based to a large extent on the nesting species and its sensitivity to disturbance. In general, buffer sizes of 200 feet for raptors and 50 feet for other birds should suffice to prevent disturbance to birds nesting in the urban environment, but these buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.</i></p> <p><u>Document Citation</u></p> <p>U.S. Fish & Wildlife Service. <i>IPaC: Information for Planning and Consultation</i>. Available at: https://ecos.fws.gov/ipac/. Accessed December 2023. (Appendix D).</p>
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Regulations set forth in 24 CFR Part 51 Subpart C require HUD-assisted projects to be separated from hazardous facilities that store, handle, or process hazardous substances by a distance based on the contents and volume of the

		<p>facilities' aboveground storage tank (AST), or to implement mitigation measures. The requisite distances are necessary, because project sites that are too close to facilities handling, storing, or processing conventional fuels, hazardous gases, or chemicals of an explosive or flammable nature may expose occupants or end-users of a project to the risk of injury in the event of a fire or an explosion. However, according to HUD guidance, if a project does not involve (1) development, construction, and/or rehabilitation that would increase residential densities, or (2) conversion of a use, further compliance or documentation pertaining to ASTs is not necessary.</p> <p>The proposed project would be limited to minor improvements such as interior renovations, upgrading security, Wi-Fi and phone infrastructure, replacing windows roofs and gutters; exterior painting and siding repair, sewer repair, ADA improvements, lighting and signage, renovation of hardscapes, parking lots, landscapes and playgrounds. Therefore, the proposed project would not alter the use of the housing sites relative to current conditions. As such, further compliance or documentation pertaining to ASTs is not necessary.</p> <p>Based on the above, the proposed project would not result in impact associated with the siting of HUD-assisted project near explosive and flammable hazards, as regulated by 24 CFR Part 51 Subpart C.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The importance of farmlands to the national and local economy requires the consideration of the impact of activities on land adjacent to prime or unique farmlands. The purpose of the Farmland Protection Policy Act (7 USC Section 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses.</p> <p>According to the California Department of Conservation (DOC) California Important Farmland Finder, the majority of the City of Oakland, including all of the housing sites, is designated as "Urban and Built-up Land." The DOC defines Urban and Built-up Land as land</p>

		<p>that is “used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.” As such, the housing sites do not contain farmland.</p> <p>Based on the above, the proposed project would not convert farmland to nonagricultural uses, and impacts related to the Farmland Protection Policy Act would not occur.</p> <p><u>Document Citation</u></p> <p>California Department of Conservation. <i>California Important Farmland Finder</i>. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed December 2023. (Appendix D).</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The provisions of Executive Order 11988, Floodplain Management, require federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable. For projects located within the 100-year floodplain, HUD policy provides that projects involving critical actions are subject to an eight-step process set forth in 24 CFR Part 55.20.</p> <p>A critical action is defined as an action for which even a slight chance of flooding is too great that would create or extend the useful life of structures or facilities including, but not limited to, hospitals, nursing homes, data storage centers, generating plants, and facilities that produce or store hazardous materials. The proposed project would not be considered a critical action.</p> <p>As previously discussed, as shown in Figure 9, although Adel Court is located within a parcel that overlaps with a SFHA; a very limited portion of the residential building area is located within the SFHA.</p> <p>The only exterior improvements to Adel Court funded by the proposed project include roof replacement, external siding and common area improvements, landscaping improvements on the western and northern site boundaries where existing landscaping is present, and the</p>

		<p>resurfacing of the existing parking lot; not only would such improvements only minor ground disturbance, but resurfacing of the existing parking lot would improve drainage of the site. In addition, the parking lot proposed for improvement is located on the opposite side of the existing residential structures from the SFHA.</p> <p>Furthermore, in accordance with HUD's procedures for complying with Executive Order 11988, the 8-Step Process for complying with the floodplain management requirements set forth by 24 CFR 55.20 has been completed as part of the proposed project.</p> <p>Consistent with Step 2 of the 8-Step Process, an Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain was published on February 19, 2025 on the Responsible Entity's environmental website and mailed notice was provided to all residents of the building and owners and occupants within a 300-foot radius of the site. Comments were not received by the Responsible Entity.</p> <p>Additionally, as required by Steps 3 and 4, the proposed project has evaluated alternatives to being developed in the base floodplain and identified the impacts of the proposed action. The building already exists and a change in density is not being proposed. Conducting the minor exterior improvements and interior improvements would ensure the continued use of the building for the purpose of providing public housing. Given that the building is located outside the SFHA and high above the creek, the risks to the persons living in Adel Court from flood plain impacts is low. Furthermore, evacuation could be immediate if necessary, given the housing site's location on a major commercial corridor/arterial. Alternative sites are not available for the relocation of the existing units and tenants. The proposed improvements to Adel Court would not cause current residents to become displaced. A No Action Alternative would result in needed repairs either being deferred or not completed, resulting in eventual costly and necessary building repairs or removal of the tenants.</p> <p>Only a very limited residential footprint is located in the SFHA. The building is already elevated out</p>
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		<p>of the creek area. The improvements involved are minor but necessary for the upkeep of the building. The SFHA is limited to the creek bed and does not involve a large floodplain area, and in fact, the creek is culverted right above the project site over MacArthur Boulevard. Should evacuation be necessary given MacArthur Boulevard's function as a main arterial, this could happen very quickly without loss of life. The fact that the creek is daylighted in the vicinity of Adel Court has natural and beneficial values here and further downstream. As such, there is a determination to approve the request without modification.</p> <p>It has been determined that there is no practicable alternative to reduce impacts associated with flooding within the floodplain. The determination was made due to: 1) the building already exists and houses 30 senior units, 2) there is an acute need to continue to provide these units, as an alternative site for the current residents to relocate to does not exist, 3) the improvements needed are minor, but continuous deferral will result in the need for more costly repairs and possible tenant relocation, 4) conducting these improvements is economically feasible, and 5) the project already mitigates and minimizes impacts on human health, public property, and floodplain values.</p> <p>Finally, consistent with Steps 7 and 8, the proposed project will publish findings and the Final Public Notice in combination with the Finding of No Significant Impact and Notice of Intent to Request Release of Funds, providing the public with an explanation of the project and additional comment periods. In addition, flood insurance has been procured to cover the Adel Court site. Accordingly, the project would be in compliance with minimization plans and flood insurance requirements.</p> <p>Overall, the proposed project would not introduce new structures or people into a SFHA. Therefore, the proposed project would not result in impacts related to conflicts with Executive Order 11988.</p> <p><u>Document Citation</u></p> <p>Figure 3, Figure 5, Figure 7, Figure 9, and Figure 15, Federal Emergency Management Agency.</p>
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		<p><i>FEMA's National Flood Hazard Layer (NFHL) Viewer.</i> Available at: https://www.fema.gov/flood-maps/national-flood-hazard-layer. Accessed November 2023. (Appendix D).</p> <p>Raney Planning & Management, Inc. <i>Floodplain Management Determination Step 3: Alternative Site Analysis</i>. February 2025. (Appendix C).</p> <p>Philadelphia Insurance Companies. <i>Flood Insurance Policy Packet</i>. May 2025. (Appendix D).</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The National Historic Preservation Act (NHPA) (16 USC 470 et seq.) directs each federal agency, and those tribal, State, and local governments that assume federal agency responsibilities, to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. Early consideration of historic places in project planning and full consultation with interested parties are key to effective compliance with Section 106. The SHPO and/or Tribal Historic Preservation Officer (THPO) are primary consulting parties in the process.</p> <p>Given the limited scope of the proposed project, which would not include grading or earthwork outside of already disturbed areas, the City has determined that consultation with applicable Native American tribes would not be necessary. While tribal resources could occur within the underlying soils of the housing sites, the limited activities associated with the proposed project would not have the potential to result in impacts to any potential on-site resources, as the existing buildings are to be retained and the underlying soils would not be disturbed within areas that have not been previously subject to substantial ground disturbance, such as areas around existing sewer and landscaping.</p> <p>As part of compliance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800, a records search of the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) at Sonoma State University was conducted for the</p>

		<p>housing sites and vicinity in order to ascertain the potential of project activities to result in potential impacts to historical resources. The CHRIS records search involved a review of the Built Environment Resources Directory (BERD), which includes listings of the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP). The CHRIS records search results indicate that only one of the housing sites proposed for improvement, Peralta Village, contains at least one structure of sufficient age to be listed in the CRHR and is considered eligible for the NRHP. In addition, the NWIC base maps show that Peralta Village is located within a recorded historic district. Since the analysis was completed in 1993-1994, the site has been heavily remodeled and it's unclear whether integrity has remained.</p> <p>However, the proposed improvements to Peralta Village would include interior improvements, security technology and Wi-Fi infrastructure installation, phone line repair, parking lot seal and stripe, landscape, site lighting, replacement of property, purchase of electric vehicles, and building signage, and sewer line replacement. Such improvements would not adversely affect any historic defining features, such as the facades or foundations, of historic structures within the Peralta Village site, and would not alter the site's current residential use. Nor would such improvements extend beyond areas that have not been previously disturbed. Therefore, proposed project funding would not be used for improvements that would compromise the historical integrity of any Peralta Village structures or have potential to disturb unknown, subsurface archeological resources.</p> <p>Given the age of the properties, the City of Oakland, as the Responsible Entity, initiated consultation with the SHPO with a letter on December 5, 2023. The letter requested concurrence with the City's finding of No Historic Properties Affected by the undertaking. A response letter from SHPO was not received within the 30-day review period. Pursuant to 36 CFR Part 800.3(c)(4), Failure of the SHPO/THPO to respond, the City may continue to the next step of the Section 106 process, and it is presumed that</p>
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		<p>historical properties and/or cultural resources would not be affected by the proposed project.</p> <p>Furthermore, the City of Oakland adopted a historic rating system in the Oakland General Plan, Historic Preservation Element, which is shorthand for the relative importance of properties. The system uses letters A to E to rate individual properties and numbers 1 to 3 for district status. Individual properties can have dual ("existing" and "contingency") ratings if they have been remodeled, and if they are in districts, they can be contributors, noncontributors, or potential contributors. In general, A and B ratings indicate landmark-quality buildings. The rating system is summarized below.</p> <p>A: Highest Importance: Outstanding architectural example or extreme historical importance. B: Major Importance: Especially fine architectural example, major historical importance. C: Secondary Importance: Superior or visually important example, or very early (pre-1906). Cs "warrant limited recognition. D: Minor Importance: Representative example E: Of no particular interest, * or F: Less than 45 years old or modernized.</p> <p>Contingency Ratings (lower-case letter, as in "Dc" or "Fb"): potential rating under some condition, such as "if restored" or "when older" or "with more information."</p> <p>District Status (numbers): "1": In an Area of Primary Importance (API) or National Register quality district. "2": In an Area of Secondary Importance (ASI) or district of local interest. "3": Not in a historic district.</p> <p>For properties in districts, + indicates contributors, - non-contributors, * potential contributors.</p> <p>Of the seven proposed sites, only Campbell Village (Fb+3) is considered to be a Potentially Designated Historic Property by the City of Oakland. If restored, Campbell Village could be considered to be of major or secondary importance. Peralta Village does not have a City of Oakland historic rating</p>
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		<p>Of the proposed improvements to Campbell Village, only the window replacement and siding repair and replacement could adversely affect the historic value of the Campbell Village site. However, neither of these items have any historic integrity or are a defining feature of the site. Specifically, the windows are while vinyl and mostly of a slider style. The siding is stucco with some wood siding at the eaves. Therefore, none of the proposed improvements would compromise the historical integrity of any Campbell Village structures or have potential to disturb unknown, subsurface archeological resources.</p> <p>Based on the above, the proposed project would not conflict with the requirements of the NHPA. Thus, impacts related to historic preservation would not occur.</p> <p><u>Document Citation</u></p> <p>Northwest Information Center. <i>Oakland Housing Authority Housing Sites Project</i>. October 24, 2023. (Appendix B).</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to HUD's noise standards set forth in 24 CFR Part 51, Subpart B, all sites whose environmental or community noise exposure exceeds the day night average sound level (DNL) of 65 decibels (dB) are considered noise-impacted areas. HUD guidance includes screening criteria to assist in evaluating a project's consistency with the foregoing standard. Pursuant to HUD guidance, potentially significant noise generators within the vicinity of a project include major roadways, if within 1,000 feet of a project site, railroads, if within 3,000 feet, and military or Federal Aviation Administration-regulated (FAA) airfields, if within 15 miles. Documentation that a project is not within the applicable distances to the foregoing noise generators demonstrates compliance with HUD's noise standard. If within the aforementioned distance, a project may show the noise level is at or below 65 dB to demonstrate consistency with the Noise Control Act of 1972.</p> <p>Although some of the housing sites are located within 1,000 feet of a major roadway and/or within 3,000 feet of a railroad, the proposed project consists of improvements to existing residential structures, and would not introduce</p>

		<p>new noise-sensitive receptors to potentially significant noise generators. In fact, the proposed project includes the installation of new dual pane windows which would help reduce the existing on-site noise levels. Therefore, the proposed project would not result in an increase in community noise exposure relative to existing conditions.</p> <p>As previously discussed, of the seven housing sites, Palo Vista Gardens is located in the closest proximity to an existing airport. The Oakland International Airport is located 1.65 miles southwest of Palo Vista Gardens (see Figure 12). In addition, according to Figure 3-3 of the Airport Land Use Compatibility Plan for the Oakland International Airport, the housing sites are not within the 65 dBA noise contour for either airport and aircraft-related noise levels.</p> <p>Based on the above, impacts related to the Noise Control Act of 1972 would not occur.</p> <p><u>Document Citation</u></p> <p>Figure 12, Raney Planning and Management, Inc. <i>ArcGIS Online</i>. November 2023.</p> <p>Alameda County. <i>Oakland International Airport Airport Land Use Compatibility Plan</i>. Adopted December 2010. (Appendix D).</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Aquifers and surface water are drinking water systems that may be impacted by development. The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</p> <p>The housing sites are not located within an area designated by the USEPA as being supported by a sole source aquifer. The southernmost housing site, Palo Vista Gardens, is located approximately 55.66 miles to the north of the nearest sole source aquifer, which is the Santa Margarita Aquifer. As such, the housing sites are not within the vicinity of a region that depends solely on an aquifer for access to water, or located within a sole source aquifer recharge area. Therefore, the proposed project would not conflict the Safe Drinking Water Act of 1974, as amended, and potential</p>

		<p>project impacts related to sole source aquifers would not occur.</p> <p><u>Document Citation</u></p> <p>Figure 13, U.S. Environmental Protection Agency. <i>NEPAssist</i>. Available at: https://nepassisttool.epa.gov/nepassist/nepamap.aspx. Accessed December 2023. (Appendix D).</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the USEPA, wetlands are characterized by hydrology, soils, and vegetation. The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Pursuant to the NWI, aquatic resources of any kind do not occur within or in the proximity of the six of the seven of the housing sites.</p> <p>However, as shown in Figure 10, Adel Court is located adjacent to a day lit section of Sausal Creek that contains mature vegetation and is in a natural state. The proposed exterior improvements for Adel Court include roof replacement, landscaping on the western and northern site boundaries where existing landscaping is present, and resurfacing of the existing parking lot; such improvements would have limited ground disturbance. In addition, the existing parking lot is separated from Sausal Creek by the intervening residential structures and wetland features are not present on the existing parking lot. Therefore, proposed project funding would not be used for improvements that would have the potential to affect Sausal Creek.</p> <p>Based on the above, the proposed project would not result in any adverse impacts to aquatic resources, and, thus, the proposed project would not conflict with Executive Order 11990. Therefore, impacts related to wetlands protection would not occur.</p>

		<p><u>Document Citation</u></p> <p>Figure 10, U.S. Fish & Wildlife Service. <i>National Wetlands Inventory</i>. Available at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed December 2023. (Appendix D).</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287) provides federal protection for certain free-flowing, wild, scenic, and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS). The NWSRS was created by Congress in 1968 to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations.</p> <p>The housing sites are not located near any NWSRS river, including designated Wild and Scenic Rivers, study rivers, and Nationwide Rivers Inventory (NRI) river segments. The nearest designated Wild and Scenic River is the American River, which is located 68.15 miles to the northeast of Adel Court, the eastern-most housing site. Therefore, the proposed project would not result in impacts related to the Wild and Scenic Rivers Act of 1968.</p> <p><u>Document Citation</u></p> <p>Figure 11, U.S. Environmental Protection Agency. <i>NEPAssist</i>. Available at: https://nepassisttool.epa.gov/nepassist/nepamap.aspx. Accessed December 2023. (Appendix D).</p>
<p>Climate Change and Energy</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the FEMA National Risk Index, Alameda County is shown to have a “Very High” risk index of 99.87. The County is known to be susceptible to relatively low risk of coastal flooding, and hail, relatively moderate risk of heat wave, tornado, tsunami, and wildfire, relatively high risk of drought, landslide, riverine flooding, and very high risk of earthquake.</p> <p>The project proposes to preserve and enhance the existing housing sites by providing cleaner and more energy-efficient utilities and rehabilitating unit interiors, as well as providing various other minor improvements. For example, the proposed project would include maintenance and/or replacement of heaters in Adel Court, boilers in</p>

		<p>Palo Vista Gardens, and the installation of new lighting in Lockwood Gardens, and new windows in Campbell Village. By upgrading such utilities to more modern appliances, operation of the housing sites will consume less energy, and, thus, reduce the existing contribution to climate change. Furthermore, the project will comply with the state's Calgreen green building requirements, as necessary.</p> <p><u>Document Citation</u></p> <p>Figure 3, Figure 5, Figure 7, Figure 9, and Figure 15, Federal Emergency Management Agency. <i>FEMA's National Flood Hazard Layer (NFHL) Viewer</i>. Available at: https://www.fema.gov/flood-maps/national-flood-hazard-layer. Accessed November 2023. (Appendix D).</p> <p>Figure 4, California Department of Fish and Wildlife. <i>California Department of Fish and Wildlife BIOS</i>. Available at: https://apps.wildlife.ca.gov/bios6/. Accessed December 2023. (Appendix D).</p>
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ENVIRONMENTAL JUSTICE

<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Environmental justice means ensuring that the environment and human health are protected fairly for all people regardless of race, color, national origin, or income. Executive Order 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations requires certain federal agencies, including HUD, to consider how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and low-income populations.</p> <p>In order to better meet the EPA's responsibilities related to the protection of public health and the environment, the California Office of Environmental Health Hazard Assessment (OEHHA) developed the CalEnviroScreen 4.0, which provides socioeconomic and environmental information for a selected area. Pursuant to the CalEnviroScreen 4.0 Results, which highlight Census Tracts with the highest intersection of low-income populations, people of color, and a given environmental indicator,</p>
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		<p>Campbell Village is identified as being within Census Tract 6001401800 (1,801 residents); Lockwood Gardens is within Census Tract 6001408800 (7,149 residents); Peralta Village is within Census Tract 6001410500 (2,705 residents); Harrison Towers is within Census Tract 6001402900 (1,406 residents); Adel Court is within Census Tract 6001404900 (4,197 residents); Palo Vista Gardens is within Census Tract 6001408800 (7,149 residents); and Foothill Family Apartments is within Census Tract 6001408600 (7096 residents). The CalEnviroScreen 4.0 Results are summarized in the table included as Attachment 1 to this document, and includes the percentiles at which the housing site areas rank relative to the entire State for various environmental indicators (i.e., PM_{2.5}, ozone, nitrogen dioxide [NO₂], DPM, toxic releases to air, traffic proximity, lead-based paint [LBP], Superfund proximity, Risk Management Program [RMP] facility proximity, hazardous waste proximity, USTs, wastewater discharge, and drinking water non-compliance).</p> <p>As previously discussed throughout this Environmental Review, the project would be limited to minor improvements to the existing structures within each of the housing sites. As such, the project would not include substantial alterations to the structures, nor would the project result in the construction of new dwelling units. Additionally, the proposed project would not alter the existing residential uses of the housing sites. Furthermore, as discussed throughout this CEST, substantial adverse effects related to various environmental topic areas would not occur or would be mitigated. Thus, the project would not introduce new uses that could result in disproportionately high and adverse human health or environmental effects on existing minority and low-income populations in the project vicinity, nor would the project induce population growth in an area subject to health risks due to poor environmental conditions.</p> <p>Based on the above, the proposed project would not result in adverse human health or environmental effects on minority and low-income populations, and impacts related to Executive Order 12898 would not occur.</p>
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		<p><u>Document Citation</u></p> <p>State of California Office of Environmental Health Hazard Assessment. <i>CalEnviroScreen 4.0 Results</i>. Available at: https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/CalEnviroScreen-4.0. Accessed April 2025. (Appendix D).</p>
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Project Information:

- Oakland Housing Authority. *Capital Budget 2020-2024*. November 2023. (Appendix A).

Additional Studies Performed:

- Northwest Information Center. *Oakland Housing Authority Housing Sites Project*. October 24, 2023. (Appendix B).
- Raney Planning & Management, Inc. *Floodplain Management Determination Step 3: Alternative Site Analysis*. February 2025. (Appendix C).

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- Bay Area Air Quality Management District. *2022 California Environmental Quality Act Guidelines*. April 2023. (Appendix D).
- California Department of Conservation. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed December 2023. (Appendix D).
- California Department of Fish and Wildlife. *California Department of Fish and Wildlife BIOS*. Available at: <https://apps.wildlife.ca.gov/bios6/>. Accessed December 2023. (Appendix D).
- California Department of Toxic Substances Control. *EnviroStor*. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed December 2023 (Appendix D).
- Centers for Disease Control and Prevention. *National Environmental Public Health Tracking Network*. Available at: <https://ephtracking.cdc.gov/DataExplorer/?c=31&i=141&m=-1>. Accessed February 2025. (Appendix D).
- City of Oakland. *Oakland Municipal Code, Article XIII. Lead Hazard Control and Abatement*. Available at: https://library.municode.com/ca/oakland/codes/code_of_ordinances?nodeId=TIT15BUCO_CH15.08OABUMACO_ARTXSUPUNUBU_15.08.340SUBUHS17920.3. Accessed December 2023. (Appendix D).
- City of Oakland. *Oakland Municipal Code, Section 15.16.050(B)(9) Cleanup, debris removal, and foundation removal standards*. Available at: https://library.municode.com/ca/oakland/codes/code_of_ordinances?nodeId=TIT15BUCO_CH15.16FIMAARPRIMRE_15.16.050CLDEREFORREST. Accessed December 2023. (Appendix D).
- Federal Emergency Management Agency. *FEMA's National Flood Hazard Layer (NFHL) Viewer*. Available at: <https://www.fema.gov/flood-maps/national-flood-hazard-layer>. Accessed November 2023. (Appendix D).
- Philadelphia Insurance Companies. *Flood Insurance Policy Packet*. May 2025. (Appendix D).
- State of California Office of Environmental Health Hazard Assessment. *CalEnviroScreen 4.0 Results*. Available at:

https://experience.arcgis.com/experience/11d2f52282a54ceeac7428e6184203/page/CalEnviroScreen-4_0. Accessed April 2025. (Appendix D).

- State Water Resources Control Board. *GeoTracker*. Available at: <https://geotracker.waterboards.ca.gov/>. Accessed December 2023. (Appendix D).
- State Water Resources Control Board. *GeoTracker – Chevron #9-0020*. Available at: https://geotracker.waterboards.ca.gov/case_summary?global_id=T0600100304. Accessed February 2025. (Appendix D).
- State Water Resources Control Board. *GeoTracker – Oakland City of Housing Authority (T0600100378)*. Available at: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600100378. Accessed December 2023. (Appendix D).
- U.S. Environmental Protection Agency. *NEPAssist*. Available at: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed December 2023. (Appendix D).
- U.S. Fish & Wildlife Service. *Coastal Barrier Resources Act*. Available at: <https://www.fws.gov/program/coastal-barrier-resources-act>. Accessed December 2023. (Appendix D).
- U.S. Fish & Wildlife Service. *IPaC: Information for Planning and Consultation*. Available at: <https://ecos.fws.gov/ipac/>. Accessed December 2023. (Appendix D).
- U.S. Fish & Wildlife Service. *National Wetlands Inventory*. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed December 2023. (Appendix D).

Summary of Findings and Conclusions: The proposed project would not negatively impact the surrounding environment and the project location would not have an adverse environmental or health effect on end users. The proposed project would comply with NEPA and other related federal and State environmental laws, as well as City of Oakland Standard Conditions of Approval, and does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
City of Oakland	Mitigation Measure 1
City of Oakland	Mitigation Measure 2
City of Oakland	Mitigation Measure 3

Mitigation Measure 1: Prior to approval of any Improvement Plans, the project applicant shall retain a qualified asbestos inspector who shall complete a Baseline Asbestos Survey or a Pre-Construction Survey of the properties to determine if asbestos is present at the sites per the ASTM E 2356-18, “Standard Practice for Comprehensive Building Asbestos Surveys.” If the survey

shows asbestos, than the applicant shall submit an O&M program for protection of workers and residents. The project applicant shall also comply with all applicable laws and regulations regarding demolition and renovation of Asbestos Containing Materials (ACM), including, but not limited to, California Code of Regulations, Title 8; California Business and Professions Code, Division 3; California Health and Safety Code sections 25915-25919.7; and Bay Area Air Quality Management District, Regulation 11, Rule 2, as may be amended. Evidence of compliance shall be submitted to the City upon request.

Mitigation Measure 2: To avoid and minimize impacts on special-status roosting bats in trees, the project applicant shall comply with the following requirements:

- a) A qualified biologist (as defined by California Department of Fish and Wildlife) who is experienced with bat surveying techniques (including auditory sampling methods), behavior, and roosting habitat shall conduct a pre-construction habitat assessment of the subject tree to characterize potential bat habitat and identify potentially active roost sites.*
- b) Trees with potential bat roosting habitat or active bat roost sites shall follow a two-step removal process which shall occur outside of the bat maternity roosting season and period of winter torpor (April 15 to August 15, and October 15 to March 1).*
- c) On the first day and under supervision of the qualified biologist, tree branches and limbs not containing cavities or fissures in which bats could roost shall be cut using chainsaws or other handheld equipment.*
- d) On the following day and under the supervision of the qualified biologist, the remainder of the tree may be trimmed or removed, either using chainsaws or other equipment (e.g., excavator or backhoe).*
- e) All felled trees shall remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats to escape, or be inspected once felled by the qualified biologist to ensure no bats remain within the tree and/or branches. The tree will be removed on or after the third day.*

Evidence of compliance shall be submitted to the City upon request.

Mitigation Measure 3: To the extent feasible, removal of any tree and/or other vegetation suitable for nesting of birds shall not occur during the bird breeding season of February 1 to August 15 (or during December 15 to August 15 for trees located in or near marsh, wetland, or aquatic habitats). If tree removal must occur during the bird breeding season, all trees to be removed shall be surveyed by a qualified biologist to verify the presence or absence of nesting raptors or other birds. Pre-removal surveys shall be conducted within 15 days prior to the start of work and shall be submitted to the City for review and approval. If the survey indicates the potential presence of nesting raptors or other birds, the biologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the nest buffer will be determined by the biologist in consultation with the California Department of Fish and Wildlife, and will be based to a large extent on the nesting species and its sensitivity to disturbance. In general, buffer sizes of 200 feet for raptors and 50 feet for other birds should suffice to prevent disturbance to birds nesting in the urban environment, but these buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.

Determination:

- ☐ This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5. **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR
- ☒ This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- ☐ This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature:  Date: 5/16/25

Name/Title/Organization: Rod Stinson/Vice President/Raney Planning and Management, Inc.

Responsible Entity Agency Official Signature:

William Gilchrist
William Gilchrist (May 18, 2025 17:33 PDT) Date: May 18, 2025

Name/Title: William Gilchrist/Planning and Building Director

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

Attachment 1

[illegible]








OHA 14 Housing Sites CEST (5.16.25)

Final Audit Report

2025-05-18

Created:	2025-05-17 (Pacific Daylight Time)
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