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: Harrison Tower Residential and Commercial / Office Rehabilitation

Responsible Entity: City of Oakland, Bureau of Planning
250 Frank Ogawa Plaza
Oakland, California 94612

Grant Recipient (if different than Responsible Entity): Oakland Housing Authority
1619 Harrison Street
Oakland, California 94612

State/Local Identifier: ESX25008

Preparer: Vanessa Villanueva, Senior Environmental Planner
Rincon Consultants

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Project Location: 1619-1621 Harrison Street
Oakland, California 94612
APN: 008-0625-023 & 008-0625-024

The project site totals approximately 0.48 acres and is located on the west side of Harrison Street between 15th Street and 17th Street in Oakland, California. The project site is developed with a 13-story mixed-use building (Harrison Tower) that was constructed in 1973 for the Oakland Housing Authority (OHA) to provide public housing. The residential portion of the existing building includes 100 affordable housing units for very low-income seniors, one manager's housing unit, property management and resident services offices, and a community amenity space. The building also includes commercial office space on the first two levels and one level of below-grade structured parking. Land uses surrounding the project site consist office, commercial, and residential uses. Appendix A-1 includes figures depicting the project location in both regional and local contexts as well as photos of existing site conditions.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]**:**
The project entails the substantial rehabilitation of the residential portion of the property including full unit renovations, accessibility upgrades, window replacement, building system upgrades (plumbing, electricity, heating/ventilation, gas, garbage, elevator, and sewer), residential common area renovations, and structural seismic retrofitting and fire/life safety upgrades to both the residential tower and commercial office spaces. The rehabilitation work will not increase the density, height, or footprint of the existing building. The project also includes the installation of an emergency generator for ventilation, elevator, and fire/life safety systems.

Level of Environmental Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

(3) Rehabilitation of buildings and improvements when the following conditions are met:
(ii) In the case of multifamily residential buildings:
(A) Unit density is not changed more than 20 percent;
(B) The project does not involve changes in land use from residential to non-residential; and
(C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

Funding Information

Grant Number	HUD Program	Funding Amount
CDFA No. 14.871	Section 8 Project-Based Vouchers	100 Section 8 Project-Based Vouchers
CFDA No. 14.881	Moving To Work (MTW) Demonstration Funds	Residential Portion: $17,000,000 Commercial/Office Portion:$9,000,000

Estimated Total HUD Funded Amount: $26,000,000
Residential Portion: $17,000,000
Commercial/Office Portion: $9,000,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]**:** $75,500,000
Residential Portion: $68,500,000
Commercial/Office Portion: $7,000,000

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 ☒	The closest airports to the project site are the San Francisco Bay Oakland International Airport (formerly the Oakland International Airport), which is located approximately 5 miles southeast of the project site, and the Hayward Executive Airport, located over 12 miles southeast. The nearest military airport to the project site is Moffat Federal Airfield, which is located approximately 28 miles southeast. At these distances, the project site is not located within an airport influence area or safety compatibility zone (Source A; Appendix A-2). The project would not subject residents to airport hazards.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☒	The Coastal Barrier Resources Act of the United States (CBRA, Public Law 97-348), enacted October 18, 1982, designated various undeveloped coastal barriers, depicted by a set of maps adopted by law, for inclusion in the John H. Chafee Coastal Barrier Resources System (CBRS). Designated CBRS areas were made ineligible for direct or indirect federal national security, navigability, and energy exploration. CBRS areas extend along the coasts of the Atlantic Ocean and the Gulf of Mexico, Puerto Rico, the US Virgin Islands, and the Great Lakes and consist of 857 units encompassing approximately 3.1 million acres of coastal barrier lands and associated aquatic habitat.

		In 2000, the United States Fish and Wildlife Service (USFWS) did not recommend inclusion of Pacific Coast coastal barriers within the CBRS, and Congress has not subsequently amended CBRA to include these barriers. The project site is located two miles from the San Francisco Bay and Pacific Ocean; however, there are no CBRS units located along the coast of California (Source B; Appendix A-3). Therefore, the project would not conflict with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes ☐ No ☒	According to the Federal Emergency Management Agency's (FEMA) Flood Map Service Center, the project site is in Flood Zone X in an area of minimal flood hazard (Map Number 06001C0067H, effective December 12, 2018) (Source C; Appendix A-4). Because the project is not located in a FEMA-designated Special Flood Hazard Area or floodplain, the project would not require purchasing of or enrollment in flood insurance under the National Flood Insurance Program.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes ☐ No ☒	The City of Oakland is in the San Francisco Bay Area Air Basin, which is a nonattainment area for ozone and PM2.5 (Source D). However, the proposed project would not involve grading of soil or conversion of an existing land use. Rather, the project would involve improvements such as utility upgrades, interior renovations, and window replacements. Rehabilitation does not require additional compliance with the Clean Air Act because no development is proposed that would contribute to air pollution (40 CFR § 93.153[c][2]). Therefore, the project does not require further review for compliance with federal air quality standards. In addition, the project does not lie within 500 feet of a freeway or other source of emissions that would require a Health Risk Assessment to be prepared.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes ☐ No ☒	The San Francisco Bay Conservation and Development Commission (BCDC) who developed the San Francisco Bay Plan, requires a BCDC permit prior to undertaking work in the Bay or within 100 feet from the shoreline. The project site is located two miles from the San Francisco Bay and Pacific Ocean and is not

		located in the California Coastal Zone (Source E; Appendix A-5). The project would not conflict with the provisions of the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☒ No ☐	Historical uses and potential hazards for the project site and immediate vicinity were provided by the State Water Resources Control Board GeoTracker and California Department of Toxic Substance Control EnviroStor databases. The project site is not listed on either database. A Phase I Environmental Site Assessment (ESA) and Phase I ESA were conducted in June 2026 by Roux Associates (Appendix A-6 and Appendix A-7). The Phase I ESA was conducted by investigating past uses on-site, reviewing the results of a search of environmental databases, reviewing records at relevant government agencies, and performing a reconnaissance of the project site and surrounding area. Although the Phase I ESA identified one recognized environmental condition, both the Phase I and Phase II ESAs found that the presence of volatile organic compounds (VOCs) in soil vapor beneath the on-site building do not appear to be migrating vertically and, therefore, the risk of vapor intrusion to the building above is low. Moreover, the existing ventilation system was determined to be a sufficient engineering control with respect to potential vapor intrusion impacts. No other compounds were found to be present at concentrations above residential or commercial screening criteria. The Phase II ESA did not recommend additional assessment. Furthermore, on August 10, 2026 and based on the information provided (including the respective findings of the Phase I and II ESAs), the San Francisco Bay Regional Water Quality Control Board (RWQCB) determined that there is no indication of a significant threat to public health, safety, or the environment from the project or to project occupants warranting the opening of a cleanup case (Appendix A-8). Nonetheless, the on-site building was constructed prior to the 1978 ban on lead-based paint (LBP) and asbestos-containing materials (ACM). A Pre-Renovation Hazardous Materials Inspection Report based on surveys performed by Kellco

		Services in 2019 and 2020 characterized the extent of ACM and LBP on-site, noting ACM and LBP was found (Appendix A-9). Therefore, mitigation measures would be required to address adverse effects relating to the presence of LBP and ACM. The proposed project would be required, pursuant to 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. In addition, as the age of the building predates 1978, 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 United States Environmental Protection Agency (USEPA) or certified renovators who are trained by USEPA-approved training providers and follow lead-safe work practices. Additionally, 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. In addition, the project applicant shall 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 District, Regulation 11, Rule 2, as may be amended. Evidence of compliance shall be submitted to the City upon request, including obtaining a J Permit from the Air District as appropriate. Finally, the City of Oakland has adopted Uniformly Applied Development Standards imposed as Standard Conditions of Approval that apply to potential impacts of asbestos. Application of this standard would further facilitate the proper handling of ACMs in the building. **Toxics-1 Asbestos in Structures.** The project applicant shall comply with all applicable laws and regulations regarding demolition and renovation of Asbestos Containing Materials, 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 District, Regulation 11, Rule 2, as may be amended. Evidence of compliance shall be submitted to the City upon request. The Center for Disease Control and Prevention (CDC) "Radon Tests from States" data was also reviewed to determine potential adverse effects from on-site exposure to high radon levels, in compliance with HUD's Office of Community Planning and Development (CPD) guidance in Notice CPD-23-103 (Department Policy for Addressing Radon in the Environmental Review Process) issued January 11, 2024. The CDC "Radon Tests from States" data does not provide radon information for California. However, a review of the CDC "Radon Tests from Labs" data filtered to show the "Mean Pre-mitigation Radon Level in Tested Buildings over a 10-year Period" indicated a mean level of 1.6 picocuries per liter of air (pCi/L) for Alameda County based on a test sample size greater than 10 (Source F). This meets HUD's CPD guidance from Notice CPD-23-103, which states that analyses should use the latest 10 years of radon testing results for a project area to indicate radon levels below 4

		pCi/L. Moreover, Alameda County's mean radon level of 1.6 pCi/L is also below the USEPA recommendation for mitigating residences with radon levels between 2 pCi/L and 4 pCi/L. Based on the available science-based data, the potential for future occupants to be exposed to elevated radon levels is low and further testing is not required (Source F).
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes ☐ No ☒	The project site is in an urbanized area that is not within any known regional wildlife movement corridors or any other sensitive biological areas as indicated by the USFWS Environmental Conservation Online System portal or the California Department of Fish and Wildlife (CDFW) Biogeographic Information Observation System portal (Sources G and H). No endangered, rare, threatened or special status plant species (or associated habitats) or wildlife species designated by the USFWS, CDFW, or California Native Plant Society would be affected by the project.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☒	The proposed project would not include development, construction, or rehabilitation that will increase residential densities, nor would the project convert an existing non-residential land use to residential use. No explosive or flammable hazards were observed during the site visit. Overall, the project would not expose residences to explosive and flammable hazards.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes ☐ No ☒	According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the project site project site is designated as Urban and Built-Up Land, and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance parcels (Source I; Appendix A-10). Because the project site does not contain agricultural land or any land under Williamson Act contracts that establish restricted land for agricultural or open space use, the project would not convert agricultural land to a non-agricultural use (Source J; Appendix A-11). Therefore, the project would not conflict with provisions for farmland protection.
Floodplain Management	Yes ☐ No ☒	The project site is in Flood Zone X, in an area of minimal flood hazard (Map Number 06001C0067H, effective December 12, 2018) (Source C; Appendix A-4). Because the project

Executive Order 11988, particularly section 2(a); 24 CFR Part 55		is not located in a FEMA-designated Special Flood Hazard Area or floodplain, the project would not affect floodplain management. In addition, the project would not involve the conversion of an existing non-residential use to residential use and would not otherwise increase the risk of flood or property damage.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☒ No ☐	A Cultural Resources Survey Report was conducted in February 2026 by Environmental Science Associates (ESA). The Report included background and archival research, as well as documentation and evaluation of existing properties in the Area of Potential Effect (APE). ESA determined that there is one individual historic-age architectural resources (i.e., 45 years or older) within the APE: 1619-1621 Harrison Street (i.e., the building itself). However, based on an evaluation of four National Register criteria considering the building's connection to potential local/regional events, significant historic individuals, distinctive architecture, and information potential, ESA concluded that the property is not currently eligible for listing in the National Register of Historic Places, the California Register of Historic Resources, or as a qualifying historical resource per the City of Oakland's thresholds. ESA also determined that the building is not a contributor to any known historic district in the vicinity of the project site. (Appendix A-12). Based on the results of the Report, ESA recommended a finding of ***no historic properties*** affected under Section 106 of the National Historic Preservation Act. The City sent the analysis to SHPO for concurrence on December 2, 2025 with a Finding of No Historic Properties Affected by the Undertaking. The SHPO responded on December 23, 2025 via a letter and did not object to the City's finding of No Historic Properties Affected (Appendix A-13). No archaeological resources were identified in the APE during a field survey of the site. The City of Oakland requested a Sacred Lands File search from the Native American Heritage Commission on September 23, 2025, which returned positive results. The City initiated consultation with nine tribes on October 27,

		2025. One consultation letter was returned and subsequently re-sent/emailed. One Tribe responded on November 11, 2025, requesting consultation. The Muwekma Ohlone Tribe of the San Francisco Bay Area replied on November 19, 2025, offering to provide Section 106 services including monitoring as required. On December 2, 2025, the City provided the Tribe with the Cultural Resources Study and on December 5, 2025, forwarded the study to the additional tribal members noted in the November 11, 2025, email. As part of consultation, the City prepared a tribal monitoring provision and mitigations for unanticipated discovery and sent these to the Tribe for concurrence on February 12, 2026. Consultation with this Tribe concluded on February 16, 2026 with the Tribe concurring with the provisions and recommending tribal monitoring (Appendix A-14). The Confederated Villages of Lisjan requested consultation on September 23, 2025. On December 8, 2025, the City sent the Cultural Resources Study to Tribe. On December 9, 2025, the Tribe requested the location and depth of proposed excavation activities. Consultation with this Tribe concluded on February 4, 2026 with the Tribe requesting that their standard mitigation measures be included in the project (Appendix A-14). Based on the City of Oakland's consultation efforts with the Tribes who requested to consult (i.e., the Muwekma Ohlone Tribe of the San Francisco Bay and Confederated Villages of Lisjan), a standard monitoring provision and mitigation measures agreed upon with the Tribes (including a mitigation measure for any discovery of human remains) would be required as part of the project. Furthermore, as part of their December 23, 2025 letter, SHPO requested that the City of Oakland provide a summary of any views conveyed by Indian tribes or other individuals and organizations likely to have knowledge of, or concerns with historic properties in the project area, should they be submitted following receipt of this letter. On September 25, 2026 via email,

		the City provided the SHPO with a summary of the consultation efforts with both consulting tribes. *Mitigation Required* **TCR-1: Tribal Monitoring.** Prior to authorization to proceed, a Secretary of the Interior-qualified archaeologist shall prepare a cultural resources monitoring plan. The plan shall be reviewed by the culturally-affiliated Native American tribe and the lead agency. The plan will include (but not be limited to) the following components: • Training program for all construction and field workers involved in site disturbance; on-site personnel shall attend a mandatory pre-project training led by a Secretary of the Interior-qualified archaeologist and a Native American representative. The training will outline the general cultural sensitivity of the area and the procedures to follow in the event cultural materials and/or human remains are inadvertently discovered. • Specifically, where monitoring will be completed and under what circumstances based on soil types, geology, distance to known sites, and other factors; • Person(s) responsible for conducting monitoring activities, including a request to the culturally-affiliated Native American tribe for a tribal monitor; • Person(s) responsible for overseeing and directing the monitors; • How the monitoring shall be conducted and the required format and content of monitoring reports; • Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; • Protocol for notifications in case of encountering cultural resources, as well as methods of dealing with the encountered resources (e.g., collection, identification, curation); • Methods to ensure security of cultural resources sites; • Protocol for notifying local authorities (i.e. Sheriff, Police) should site looting and

		other illegal activities occur during construction. During the course of the monitoring, the archaeologist and tribal monitor may adjust the frequency—from continuous to intermittent—of the monitoring based on the conditions and professional judgment regarding the potential to impact resources. If cultural materials are encountered, all soil disturbing activities within 100 feet in all directions of the find shall cease until the resource is evaluated. The archaeological monitor shall immediately notify the lead agency of the encountered resource. After making a reasonable effort to assess the identity, integrity, and significance of the encountered resource, in consultation with the culturally-affiliated Native American tribe, the archaeological monitor shall present the findings of this assessment to the lead agency. If the find is determined to be potentially significant, the archaeologist, in consultation with the lead agency and the culturally-affiliated Native American tribe shall determine whether preservation in place is feasible. This may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If avoidance is not feasible, the lead agency shall consult with the culturally-affiliated Native American tribe and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource. This shall include documentation of the resource and may include data recovery, if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource. **TCR-2: Native American Monitoring.** Prior to ground disturbing activities, a Tribal monitor shall be retained. The Monitor will

		have the authority to halt and redirect work should any archeological or tribal cultural resources be identified during monitoring. If archeological or Tribal cultural resources are encountered during ground disturbing activities, work within 100 feet of the find must halt and the find must be evaluated for listing in the CRHR and NRHP. Monitoring may be reduced or halted at the discretion of the monitor, in consultation with the lead agency, as warranted by conditions such as encountering bedrock, sediments being excavated are fill, negative findings during the first 50 percent of the entire area of ground disturbance, etc. If monitoring is reduced to spot checking, spot checking shall occur when ground disturbing activities moves to a new location within the project site and/or when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). **TCR-3: Unanticipated Discovery of Tribal Cultural Resources.** If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 100 feet shall cease until an archeologist has evaluated the nature and significance of the find as a cultural resource and a representative from the Tribe is consulted by the government agency. The archeologist will stake the area of discovery, placing stakes no more than 10 feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery. If the entity in consultation with the consulting Tribe, determines that the resource is a tribal cultural resource and thus significant under NEPA and/or the Tribe, the entity shall retain a qualified archeologist and a Tribal monitor, at the project applicant's expense, to prepare a mitigation plan, which shall be implemented by the entity in accordance with state guidelines and in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe and, if applicable, a qualified

		archeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery. **TCR-4: Halt Work/Coroner's Evaluation/**Impact **to Previously Undiscovered Human Remains.** If human remains are encountered during construction and/or other ground disturbing activities, all work within 100 feet of the remains should be redirected and the County Coroner notified immediately. At the same time, an archeologist shall be contacted to assess the situation. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and any associated funerary objects. There shall be no pictures taken or testing done on the Native American human remains. All bone, if not identifiable as human or animal, shall be treated as human remains and the appropriate protocols followed. The archeologist shall record information, as appropriate and in accordance with the recommendations of the MLD and/or Tribal representative. Upon completion of the archeologist's assessment, a report should be prepared documenting methods and results, as well as recommendations regarding the treatment of the human remains and any associated archeological materials. The report should be submitted to the City, the project proponent, the NWIC and the consulting Tribe. Tribal representatives will rebury the Native American human remains and associated funerary objects with the appropriate dignity, either; in accordance with the recommendations of the MLD if available or in the project vicinity at a location agreed upon between the Tribe and the consultant, where the reburial would be accessible to Tribal members in perpetuity and would not be

		subject to further disturbance. The discovery and reburial is to be kept confidential and secure to prevent any further disturbance. In addition, the City has Standard Conditions of Approval related to pre-construction measures; archaeological, paleontological, and human remains discoveries during construction; and archaeologically sensitive areas. Application of these standards would further facilitate the proper treatment of any unanticipated discoveries during construction. **TCR-5. Archaeological and Paleontological Resources – Discovery During Construction.** Pursuant to CEQA Guidelines Section 15064.5(f), in the event that any historic or prehistoric subsurface cultural resources are discovered during ground disturbing activities, all work within 50 feet of the resources shall be halted and the project applicant shall notify the City and consult with a qualified archaeologist or paleontologist, as applicable, to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined unnecessary or infeasible by the City. Feasibility of avoidance shall be determined with consideration of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Work may proceed on other parts of the project site while measures for the cultural resources are implemented. In the event of data recovery of archaeological resources, the project applicant shall submit an Archaeological Research Design and Treatment Plan (ARDTP) prepared by a qualified archaeologist for review and approval by the City. The ARDTP is required to identify how the proposed data recovery program would preserve the significant

		information the archaeological resource is expected to contain. The ARDTP shall identify the scientific/historic research questions applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ARDTP shall include the analysis and specify the curation and storage methods. Data recovery, in general, shall be limited to the portions of the archaeological resource that could be impacted by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practicable. Because the intent of the ARDTP is to save as much of the archaeological resource as possible, including moving the resource, if feasible, preparation and implementation of the ARDTP would reduce the potential adverse impact to less than significant. The project applicant shall implement the ARDTP at his/her expense. In the event of excavation of paleontological resources, the project applicant shall submit an excavation plan prepared by a qualified paleontologist to the City for review and approval. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and/or a report prepared by a qualified paleontologist, as appropriate, according to current professional standards and at the expense of the project applicant. **TCR-6. Archaeologically Sensitive Areas – Pre-Construction Measures.** The project applicant shall implement Provision A (Intensive Pre-Construction Study) and Provision B (Construction ALERT Sheet) concerning archaeological resources. If Native American archaeological resources are identified or suspected in a project site, the City shall consult with a Native American representative(s) registered with the Native American Heritage Commission that is traditionally and culturally affiliated with the geographic area as described in Public Resources Code Section 21080.3.

		Provision A: Intensive Pre-Construction Study. The project applicant shall retain a qualified archaeologist to conduct a site-specific, intensive archaeological resources study for review and approval by the City prior to soil-disturbing activities occurring on the project site. The purpose of the site-specific, intensive archaeological resources study is to identify early the potential presence of history-period archaeological resources on the project site. At a minimum, the study shall include: a. Subsurface presence/absence studies of the project site. Field studies may include, but are not limited to, auguring and other common methods used to identify the presence of archaeological resources. b. A report disseminating the results of this research. c. Recommendations for any additional measures that could be necessary to mitigate any adverse impacts to recorded and/or inadvertently discovered cultural resources. If the results of the study indicate a high potential presence of historic-period archaeological resources on the project site, or a potential resource is discovered, the project applicant shall hire a qualified archaeologist to monitor any ground disturbing activities on the project site during construction and prepare an ALERT sheet pursuant to Provision B below that details what could potentially be found at the project site. Archaeological monitoring would include briefing construction personnel about the type of artifacts that may be present (as referenced in the ALERT sheet, required per Provision B below) and the procedures to follow if any artifacts are encountered, field recording and sampling in accordance with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation, notifying the appropriate officials if human remains or cultural resources are discovered, and preparing a report to document negative findings after construction is completed if no archaeological resources are discovered during construction. Provision B: Construction ALERT Sheet. The project applicant shall prepare a construction

		"ALERT" sheet developed by a qualified archaeologist for review and approval by the City prior to soil-disturbing activities occurring on the project site. The ALERT sheet shall contain, at a minimum, visuals that depict each type of artifact that could be encountered on the project site. Training by the qualified archaeologist shall be provided to the project's prime contractor, any project subcontractor firms (including demolition, excavation, grading, foundation, and pile driving), and utility firms involved in soildisturbing activities within the project site. The ALERT sheet shall state, in addition to the basic archaeological resource protection measures contained in other standard conditions of approval, all work must stop and the City's Environmental Review Officer contacted in the event of discovery of the following cultural materials: concentrations of shellfish remains; evidence of fire (ashes, charcoal, burnt earth, firecracked rocks); concentrations of bones; recognizable Native American artifacts (arrowheads, shell beads, stone mortars [bowls], humanly shaped rock); building foundation remains; trash pits, privies (outhouse holes); floor remains; wells; concentrations of bottles, broken dishes, shoes, buttons, cut animal bones, hardware, household items, barrels, etc.; thick layers of burned building debris (charcoal, nails, fused glass, burned plaster, burned dishes); wood structural remains (building, ship, wharf); clay roof/floor tiles; stone walls or footings; or gravestones. Prior to any soil-disturbing activities, each contractor shall be responsible for ensuring that the ALERT sheet is circulated to all field personnel, including machine operators, field crew, pile drivers, and supervisory personnel. The ALERT sheet shall also be posted in a visible location at the project site. **TCR-7. Human Remains – Discovery During Construction.** Pursuant to CEQA Guidelines Section 15064.5(e)(1), in the event that human skeletal remains are uncovered at the project site

		during construction activities, all work shall immediately halt and the project applicant shall notify the City and the Alameda County Coroner. If the County Coroner determines that an investigation of the cause of death is required or that the remains are Native American, all work shall cease within 50 feet of the remains until appropriate arrangements are made. In the event that the remains are Native American, the City shall contact the California Native American Heritage Commission (NAHC), pursuant to subdivision (c) of section 7050.5 of the California Health and Safety Code. If the agencies determine that avoidance is not feasible, then an alternative plan shall be prepared with specific steps and timeframe required to resume construction activities. Monitoring, data recovery, determination of significance, and avoidance measures (if applicable) shall be completed expeditiously and at the expense of the project applicant.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☒ No ☐	The proposed rehabilitation would have no long-term impact to ambient noise levels and would not expose sensitive receivers to excessive noise. The proposed rehabilitation would not increase the number of residents exposed to existing noise since there would be no change in land use or the number of residential units, and the project would not create new noise sources. HUD requires consideration of noise sources such as airports within 15 miles; major roadways within 1,000 feet, and railroads within 3,000 feet. There are no major roadways or railroads within these distances. The Bay Area Rapid Transit (BART) light rail system operates trains approximately 975 feet west of the project site. However, BART operations are undergrounded near the site, and therefore, noise from rail operations do not affect the site. Furthermore, the closest airports to the project site are the Oakland San Francisco Bay Oakland International Airport (formerly the Oakland International Airport), which is located approximately 5 miles southeast of the project site, and the Hayward Executive Airport, located over 12 miles southeast. The nearest military airport to the project site is Moffat Federal Airfield, which is located approximately 28 miles southeast. However, at these distances, the

		site is not within the noise contours for either of these airports (Source A; Appendix A-2). Aircraft noise only contributes to ambient noise at the site. An Environmental Noise Study was completed by Salter Inc for the proposed project (Appendix A-15), which analyzed the noise environment at the site in comparison to applicable noise exposure standards and calculated window and exterior door Sound Transmission Class (STC) ratings needed to meet standards. The proposed project would be constructed in accordance with the recommendations of the Environmental Noise Study. Based on the preliminary screening analysis and additional Environmental Noise Study, no further noise analysis is warranted. *Mitigation Required* **Noise-1 Wall and Window STC Ratings** Follow all recommendations for wall and window STC ratings laid forth in the Environmental Noise Study prepared for the project by Salter, February 5, 2026 (Appendix A-15).
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes ☐ No ☒	The project site is not located in an area supported by a sole source aquifer. The closest sole source aquifer is the Santa Margarita Aquifer, Scotts Valley Aquifer, which is located over 45 miles southeast of the City (Source K).
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☒	The project site is in an urbanized area in the City of Oakland. Federally protected wetlands or waters as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) do not occur on-site. and therefore. would not be impacted through direct removal, filling, hydrological interruption, or other means. The nearest wetland to the project site mapped by the USFWS consists of a Lake Merritt located 0.25 miles east of the site (Source L; Appendix A-16). The project would not conflict with provisions for wetland protection.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes ☐ No ☒	The nearest classified National Wild and Scenic River is the Lower American Wild and Scenic River, which is located approximately 70 miles northeast of the project site (Source M; Appendix A-17). There are no rivers or river systems in California currently under 'authorized'

		study under the Wild and Scenic Rivers Act (Source N). The nearest Nationwide Rivers Inventory River is the 3-mile segment of Redwood Creek, approximately 17.5 miles northwest of the project site (Source M; Appendix A-17). Implementation of the project would not conflict with the provisions of the Wild and Scenic Rivers Act.

Additional Studies Performed:

Appendices

A-1 Project Location Figures
A-2 Airport Influence Areas and Proximity Map
A-3 Coastal Barrier Resources System Units in the Country
A-4 FEMA FIRMette
A-5 Coastal Zone Boundary Map
A-6 Phase I Environmental Site Assessment
A-7 Phase II Environmental Site Assessment
A-8 San Francisco Bay RWQCB Determination Letter
A-9 Pre-Renovation Hazardous Materials Inspection Report
A-10 California Important Farmland Finder
A-11 Williamson Act Enrollment Finder
A-12 Cultural Resources Survey Report
A-13 SHPO Concurrence Letter
A-14 Native American Tribe Correspondence
A-15 Environmental Noise Study
A-16 Distance to Nearest Wetland
A-17 Nationwide Rivers Inventory Maps

List of Sources:

(A) Alameda County. 2010. Oakland International Airport. Land Use Plan. Chapter 3: Oakland International Airport Policies. Figure 3-3. Noise Compatibility Zones. Accessed at: https://acgov.org/cda/planning/generalplans/documents/OAKCh3_Oakland_International_Airport_Policies.pdf.

(B) United States Fish and Wildlife Service (USFWS). 2026. Coastal Barrier Resources System Mapper. Accessed at: https://apps.usgs.gov/fws/CBRSMapper-v2/.

(C) Federal Emergency Management Agency (FEMA). 2026. FEMA Flood Maps. Accessed at: https://msc.fema.gov/portal/search?AddressQuery.

(D) California Environmental Protection Agency. 2026. California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants. Accessed at: https://www3.epa.gov/airquality/greenbook/anayo_ca.html.

(E) California Coastal Commission. 2019. Maps. Coastal Zone Boundary. San Francisco. Accessed at https://www.coastal.ca.gov/maps/czb/.

(F) Center for Disease Control (CDC). 2025. Radon Testing. Accessed at: https://www.cdc.gov/environmental-health-tracking/php/data-research/radon-testing.html.

(G) United States Fish and Wildlife Service (USFWS). 2026. Environmental Conservation Online System (ECOS) Threatened and Endangered Species Active Critical Habitat Report. Accessed at: https://ecos.fws.gov/ecp/report/table/critical-habitat.html.

(H) California Department of Fish and Wildlife (CDFW). 2026. Biogeographic Information and Observation System. Accessed at https://apps.wildlife.ca.gov/bios6/.

(I) California Department of Conservation (DOC). 2026. Farmland Mapping and Monitoring Program - California Important Farmland Finder. Accessed at: https://maps.conservation.ca.gov/dlrp/ciff/app/#data_s=id%3Awidget_647_output_config_default_geocode_0_0%3A0.

(J) California Department of Conservation (DOC). 2026. California Williamson Act Enrollment Finder. Accessed at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/#data_s=id%3AdataSource_1-19df91378be-layer-18-19df9137a4f-layer-21%3A7.

(K) United States Environmental Protection Agency (USEPA). 2026. Sole Source Aquifers – Interactive Map Set. Accessed at: https://experience.arcgis.com/experience/1bfab371d71e4b868fc9ae7df62a16fe#data_s=id%3Awidget_22_output_config_default_geocode_0_0%3A0.

(L) United States Fish and Wildlife Service (USFWS). 2026. National Wetlands Inventory. Accessed at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

(M) National Park Service. 2026. Nationwide Rivers Inventory. Accessed at: https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm.

(N) National Wild and Scenic Rivers System. 2026. Study Rivers. Accessed at: https://www.fws.gov/rivers/study-rivers.

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.

***** The Standard Conditions of Approval were initially and formally adopted by the Oakland City Council on November 3, 2008 (Ordinance No. 12899 C.M.S.), pursuant to Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 (and now Section 15183.3), and incorporate development policies and standards from various adopted plans, policies, and ordinances (such as the Oakland Planning and Municipal Codes, Oakland Creek Protection, Stormwater Management and Discharge Control Ordinance, Oakland Tree Protection Ordinance, Oakland Grading Regulations, National Pollutant Discharge Elimination System (NPDES) requirements, Housing Element and other General Plan Element-related mitigation measures, California Building Code, Uniform Fire Code, Energy and Climate Action Plan, Complete Streets Policy, and Green Building Ordinance, among others), which have been found to substantially mitigate environmental effects.

Where there are peculiar circumstances associated with a project or project site that will result in significant environmental impacts despite implementation of the Standard Conditions of Approval, mitigation measures have been identified to reduce the impact to *less than significant* levels.

**** A Standard Condition of Approval /Mitigation Monitoring and Reporting Program is attached as a separate document.**

Law, Authority, or Factor	Mitigation Measure or City of Oakland Standard Condition of Approval
Contamination and Toxic Substances [24 CFR Part 50.3(i) & 58.5(i)(2)]	**Toxics-1: Asbestos in Structures.** The project applicant shall comply with all applicable laws and regulations regarding demolition and renovation of Asbestos Containing Materials, 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.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	**TCR-1: Tribal Monitoring.** Prior to authorization to proceed, a Secretary of the Interior-qualified archaeologist shall prepare a cultural resources monitoring plan. The plan shall be reviewed by the culturally-affiliated Native American tribe and the lead agency. The plan will include (but not be limited to) the following components: • Training program for all construction and field workers involved in site disturbance; on-site personnel shall attend a mandatory pre-project training led by a Secretary of the Interior-qualified archaeologist and a Native American representative. The training will outline the general cultural sensitivity of the area and the procedures to follow in the event cultural materials and/or human remains are inadvertently discovered. • Specifically, where monitoring will be completed and under what circumstances based on soil types, geology, distance to known sites, and other factors; • Person(s) responsible for conducting monitoring activities, including a request to the culturally-affiliated Native American tribe for a tribal monitor; • Person(s) responsible for overseeing and directing the monitors; • How the monitoring shall be conducted and the required format and content of monitoring reports; • Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; • Protocol for notifications in case of encountering cultural resources, as well as methods of dealing with the encountered resources (e.g., collection, identification, curation); • Methods to ensure security of cultural resources sites; • Protocol for notifying local authorities (i.e. Sheriff, Police) should site looting and other illegal activities occur during construction.

	During the course of the monitoring, the archaeologist and tribal monitor may adjust the frequency—from continuous to intermittent—of the monitoring based on the conditions and professional judgment regarding the potential to impact resources. If cultural materials are encountered, all soil disturbing activities within 100 feet in all directions of the find shall cease until the resource is evaluated. The archaeological monitor shall immediately notify the lead agency of the encountered resource. After making a reasonable effort to assess the identity, integrity, and significance of the encountered resource, in consultation with the culturally-affiliated Native American tribe, the archaeological monitor shall present the findings of this assessment to the lead agency. If the find is determined to be potentially significant, the archaeologist, in consultation with the lead agency and the culturally-affiliated Native American tribe shall determine whether preservation in place is feasible. This may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If avoidance is not feasible, the lead agency shall consult with the culturally-affiliated Native American tribe and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource. This shall include documentation of the resource and may include data recovery, if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource.
	TCR-2: Native American Monitoring. Prior to ground disturbing activities, a Tribal monitor shall be retained. The Monitor will have the authority to halt and redirect work should any archeological or tribal cultural resources be identified during monitoring. If archeological or Tribal cultural resources are encountered during ground disturbing activities, work within 100 feet of the find must halt and the find must be evaluated for listing in the CRHR and NRHP. Monitoring may be reduced or halted at the discretion of the monitor, in consultation with the lead agency, as warranted by conditions such as encountering bedrock, sediments being excavated are fill, negative findings during the first 50 percent of the entire area of ground disturbance, etc. If monitoring is reduced to spot checking, spot checking shall occur when ground disturbing activities

	moves to a new location within the project site and/or when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock).
	TCR-3: Unanticipated Discovery of Tribal Cultural Resources. If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 100 feet shall cease until an archeologist has evaluated the nature and significance of the find as a cultural resource and a representative from the Tribe is consulted by the government agency. The archeologist will stake the area of discovery, placing stakes no more than 10 feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery. If the entity in consultation with the consulting Tribe, determines that the resource is a tribal cultural resource and thus significant under NEPA and/or the Tribe, the entity shall retain a qualified archeologist and a Tribal monitor, at the project applicant's expense, to prepare a mitigation plan, which shall be implemented by the entity in accordance with state guidelines and in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe and, if applicable, a qualified archeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.
	TCR-4: Halt Work/Coroner's Evaluation/Impact to Previously Undiscovered Human Remains. If human remains are encountered during construction and/or other ground disturbing activities, all work within 100 feet of the remains should be redirected and the County Coroner notified immediately. At the same time, an archeologist shall be contacted to assess the situation. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and any associated funerary objects. There shall be no pictures taken or testing done on the Native American human remains. All bone, if not identifiable as human or animal, shall be treated as human remains and the appropriate protocols followed. The archeologist shall record information, as appropriate and in accordance with the recommendations of the MLD and/or Tribal representative. Upon completion of the archeologist's assessment, a report

	should be prepared documenting methods and results, as well as recommendations regarding the treatment of the human remains and any associated archeological materials. The report should be submitted to the City, the project proponent, the NWIC and the consulting Tribe. Tribal representatives will rebury the Native American human remains and associated funerary objects with the appropriate dignity, either; in accordance with the recommendations of the MLD if available or in the project vicinity at a location agreed upon between the Tribe and the consultant, where the reburial would be accessible to Tribal members in perpetuity and would not be subject to further disturbance. The discovery and reburial is to be kept confidential and secure to prevent any further disturbance.
	TCR-5. Archaeological and Paleontological Resources – Discovery During Construction. **Requirement:** Pursuant to CEQA Guidelines Section 15064.5(f), in the event that any historic or prehistoric subsurface cultural resources are discovered during ground disturbing activities, all work within 50 feet of the resources shall be halted and the project applicant shall notify the City and consult with a qualified archaeologist or paleontologist, as applicable, to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined unnecessary or infeasible by the City. Feasibility of avoidance shall be determined with consideration of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Work may proceed on other parts of the project site while measures for the cultural resources are implemented. In the event of data recovery of archaeological resources, the project applicant shall submit an Archaeological Research Design and Treatment Plan (ARDTP) prepared by a qualified archaeologist for review and approval by the City. The ARDTP is required to identify how the proposed data recovery program would preserve the significant information the archaeological resource is expected to contain. The ARDTP shall identify the scientific/historic research questions applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ARDTP shall include the analysis and specify the

	curation and storage methods. Data recovery, in general, shall be limited to the portions of the archaeological resource that could be impacted by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practicable. Because the intent of the ARDTP is to save as much of the archaeological resource as possible, including moving the resource, if feasible, preparation and implementation of the ARDTP would reduce the potential adverse impact to less than significant. The project applicant shall implement the ARDTP at his/her expense. In the event of excavation of paleontological resources, the project applicant shall submit an excavation plan prepared by a qualified paleontologist to the City for review and approval. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and/or a report prepared by a qualified paleontologist, as appropriate, according to current professional standards and at the expense of the project applicant. **TCR-6. Archaeologically Sensitive Areas – Pre-Construction Measures.** **Requirement:** The project applicant shall implement Provision A (Intensive Pre-Construction Study) and Provision B (Construction ALERT Sheet) concerning archaeological resources. If Native American archaeological resources are identified or suspected in a project site, the City shall consult with a Native American representative(s) registered with the Native American Heritage Commission that is traditionally and culturally affiliated with the geographic area as described in Public Resources Code Section 21080.3. <u>Provision A: Intensive Pre-Construction Study.</u> The project applicant shall retain a qualified archaeologist to conduct a site-specific, intensive archaeological resources study for review and approval by the City prior to soil-disturbing activities occurring on the project site. The purpose of the site-specific, intensive archaeological resources study is to identify early the potential presence of history-period archaeological resources on the project site. At a minimum, the study shall include: a. Subsurface presence/absence studies of the project site. Field studies may include, but are not limited to, auguring and other common methods used to identify the presence of archaeological resources. b. A report disseminating the results of this research.

	c. Recommendations for any additional measures that could be necessary to mitigate any adverse impacts to recorded and/or inadvertently discovered cultural resources. If the results of the study indicate a high potential presence of historic-period archaeological resources on the project site, or a potential resource is discovered, the project applicant shall hire a qualified archaeologist to monitor any ground disturbing activities on the project site during construction and prepare an ALERT sheet pursuant to Provision B below that details what could potentially be found at the project site. Archaeological monitoring would include briefing construction personnel about the type of artifacts that may be present (as referenced in the ALERT sheet, required per Provision B below) and the procedures to follow if any artifacts are encountered, field recording and sampling in accordance with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation, notifying the appropriate officials if human remains or cultural resources are discovered, and preparing a report to document negative findings after construction is completed if no archaeological resources are discovered during construction. <u>Provision B: Construction ALERT Sheet.</u> The project applicant shall prepare a construction "ALERT" sheet developed by a qualified archaeologist for review and approval by the City prior to soil-disturbing activities occurring on the project site. The ALERT sheet shall contain, at a minimum, visuals that depict each type of artifact that could be encountered on the project site. Training by the qualified archaeologist shall be provided to the project's prime contractor, any project subcontractor firms (including demolition, excavation, grading, foundation, and pile driving), and utility firms involved in soildisturbing activities within the project site. The ALERT sheet shall state, in addition to the basic archaeological resource protection measures contained in other standard conditions of approval, all work must stop and the City's Environmental Review Officer contacted in the event of discovery of the following cultural materials: concentrations of shellfish remains; evidence of fire (ashes, charcoal, burnt earth, firecracked rocks); concentrations of bones; recognizable Native American artifacts (arrowheads, shell beads, stone mortars [bowls], humanly shaped rock); building foundation remains; trash pits, privies (outhouse holes); floor remains; wells; concentrations of bottles, broken dishes, shoes, buttons, cut animal bones, hardware, household items, barrels, etc.; thick layers of burned building debris (charcoal, nails, fused glass, burned plaster, burned dishes);

	wood structural remains (building, ship, wharf); clay roof/floor tiles; stone walls or footings; or gravestones. Prior to any soil-disturbing activities, each contractor shall be responsible for ensuring that the ALERT sheet is circulated to all field personnel, including machine operators, field crew, pile drivers, and supervisory personnel. The ALERT sheet shall also be posted in a visible location at the project site. **TCR-7: Human Remains – Discovery During Construction.** **Requirement:** Pursuant to CEQA Guidelines Section 15064.5(e)(1), in the event that human skeletal remains are uncovered at the project site during construction activities, all work shall immediately halt and the project applicant shall notify the City and the Alameda County Coroner. If the County Coroner determines that an investigation of the cause of death is required or that the remains are Native American, all work shall cease within 50 feet of the remains until appropriate arrangements are made. In the event that the remains are Native American, the City shall contact the California Native American Heritage Commission (NAHC), pursuant to subdivision (c) of section 7050.5 of the California Health and Safety Code. If the agencies determine that avoidance is not feasible, then an alternative plan shall be prepared with specific steps and timeframe required to resume construction activities. Monitoring, data recovery, determination of significance, and avoidance measures (if applicable) shall be completed expeditiously and at the expense of the project applicant.
Noise Abatement and Control	**Noise-1 Wall and Window STC Ratings.** Follow all recommendations for wall and window STC ratings laid forth in the Environmental Noise Study prepared for the project by Salter, February 5, 2026 (Appendix A-15).

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: Vanessa Villan Date: 10/1/2026

Name/Title/Organization: Vanessa Villanueva, Senior Environmental Planner, Rincon Consultants

Responsible Entity Agency Official Signature:

William Gilchrist
William Gilchrist (Oct 2, 2026 12:50:53 PDT) Date: Oct 2, 2026

Name/Title: William Gilchrist, Director, Department of Planning and Building and NEPA Certifying Officer

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).

NEPA CEST - Harrison Tower Project_Oct 2026

Final Audit Report 2026-10-02

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