NOTICE OF FINDING OF NO SIGNFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

November 20, 2026

County of Santa Clara
Office of Supportive Housing
150 West Tasman Drive
San Jose, CA 95134
408-278-6429

California Housing Finance Agency
500 Capitol Mall, Ste 1400
Sacramento, CA 95814
916-326-8800
These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the County of Santa Clara and the California Housing Finance Agency.

REQUEST FOR RELEASE OF FUNDS

On or about **December 8, 2026,** the County of Santa Clara and the California Housing Finance Agency will each submit a request to HUD for the release of HFA Risk-Sharing funds under Section YHC-542(c) program as authorized by the Housing and Community Development Act of 1992 (12 U.S.C. 1707) and Section 235 of HUD's FY 2001 Appropriation Act, Public Law 106-377, as amended, and the Santa Clara County Housing Authority will authorize the County of Santa Clara to submit a request to HUD for the release of 30 HUD Veterans Affairs Supportive Housing (HUD-VASH) Vouchers, as authorized by the 2008 Consolidated Appropriations Act, Public Law 110-161, and Section 8(o)(13) of the U.S. Housing Act of 1937 (42 U.S.C. 1437f (o)(13)), as amended; to undertake a project known as Cleveland Commons for the purpose of providing affordable housing.

Charities Housing proposes to develop the Cleveland Commons affordable housing project on a 1.21-acre site (APN 305-21-003) with address 60 West Hamilton Avenue, Campbell, Santa Clara County, California 95008. The site is currently occupied by a vacant bank building that will be demolished to construct a new, four-story building with 92 affordable apartments. The unit mix will be 91 one-bedroom units and one three-bedroom unit for an on-site manager. A total of 56 on-grade parking spaces will be provided, along with 44 bicycle parking spaces. The ground floor will contain the lobby, offices, community room (about 800 square feet), computer room (about 180 square feet), maintenance room, heat room, storage rooms, bicycle storage, trash area and mailroom. A 4,359 square foot central courtyard will provide quiet common outdoor space for residents. The project includes demolition, reconstruction and trenching work required to provide utilities to the site and any upgrades required in the public right-of-way, including curb, gutter and sidewalk as needed. The project is 100% affordable with 30 units reserved for veterans and 10 units set aside for individuals with developmental disabilities (IDD) and their families.

The funding sources for the project include $18,741,000 from the Housing Finance Agency Risk-Sharing: Section YHC-542(c) program and the Santa Clara County Housing Authority (SCCHA) will be providing assistance to the project in the form of Section 8 Project Based

Vouchers (PBVs) for 30 units as authorized under Section 8 of the Housing Act of 1937 of 1990, as amended. PBV housing assistance will be provided for an initial contract term of 20 years, with a possible renewal of an additional 20 years, subject to annual appropriations from the federal government and SCCHA's determination that the owner is in compliance with the Housing Assistance Payment contract and other applicable HUD requirements, for a total of forty (40) years. The estimated total funding for rental subsidy is $23,392,800 ($1,169,640 annually) for the initial 20-year term of the Housing Assistance Payment contract and contingent upon the availability of Section 8 funds as allocated by the federal government. Please note that the actual funded amount may be up to $5,000,000 more to account for market fluctuations.

The total project cost is estimated to be $80,600,000.

FINDING OF NO SIGNIFICANT IMPACT

Acting as the Responsible Entity under a Lead Agency Agreement with California Housing Finance Agency, the County of Santa Clara has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at the County of Santa Clara, Office of Supportive Housing at 150 West Tasman Drive, Suite 2A, San José, CA 95134 and may be examined or copied on weekdays 9:00 A.M. to 4:00 P.M. or by appointment.

The ERR will be made available to the public for review electronically at the following websites:

https://cpd.hud.gov/cpd-public/environmental-reviews
https://www.calhfa.ca.gov/about/press/public-notice/index.htm

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to Natalie Monk, County of Santa Clara, Office of Supportive Housing, 150 West Tasman Drive, San José CA 95134, or via email at natalie.monk@osh.sccgov.org or to CalHFA to the attention of Madina Castro at mcastro@calhfa.ca.gov. All comments received by **December 7, 2026,** will be considered by the County of Santa Clara and California Housing Finance Agency prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

The County of Santa Clara certifies to HUD that Kathryn (KJ) Kaminski in her capacity as Director of the Office of Supportive Housing/Anthony Sertich in his capacity as CalHFA Executive Director, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the County of Santa Clara and the California Housing Finance Agency to use Program funds**.**

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the County of Santa Clara's certifications for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the County of Santa Clara; (b) the County of Santa Clara has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to Department of Housing and Urban Development, Office of Public Housing, and sent to the following email address: RROSFRO@hud.gov and Ryan.M.Lewis1@hud.gov. Potential objectors should contact HUD to verify the actual last day of the objection period.

Kathryn (KJ) Kaminski, Director, Office of Supportive Housing, County of Santa Clara.

Anthony Sertich, Executive Director, California Housing Finance Agency

U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58

Project Information

Update Date	Updated By	Start Date	Deadline Date	End Date	Justification
10/15/2026	Cinnamon Crake	10/15/2026	10/15/2027		Start Date Set
11/18/2026	Stephan Jackson	10/15/2026	10/15/2027	11/17/2026	Actual End Date set to Signed Date on Signature and Posting (6320) screen.

Project Name: Cleveland-Commons

HEROS Number: 900000010561624

Start Date: 10/15/2026

Estimated End Date: 10/15/2027

Actual End Date: 11/17/2026

Responsible Entity (RE): SANTA CLARA COUNTY, 150 W. Tasman Dr. San Jose CA, 95134

RE Preparer: Erum Maqbool

State / Local Identifier:

Certifying Officer: Kathryn (KJ) Kaminski

Grant Recipient (if different than Responsible Entity): Santa Clara County Housing Authority

PHA Code:

Point of Contact: Preston Prince

Consultant (if applicable): Bay Desert, Inc.

Point of Contact: Cinnamon Crake

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a consultant, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 60 W Hamilton Ave, Campbell, CA 95008

Additional Location Information:
The subject property is L-shaped or flag-shaped and is comprised of one parcel (APN 305-21-003) that is 1.21 acres in size with address 60 West Hamilton Avenue, Campbell, Santa Clara County, California 95008. The site is improved with a former bank building and paved parking lot. Landscaping and trees line the parking lot. The building was constructed in ca. 1970. The site is located near the intersection of Winchester Boulevard and West Hamilton Avenue, at the northern end of Downtown Campbel. Highway 17 lies to the east; the San Tomas Expressway to the west. The property lies between two bank buildings to the east and west; West Hamilton Avenue lies to the north with retail/commercial beyond; multifamily residential lies south of the site. Source: (5)

Direct Comments to: natalie.monk@osh.sccgov.org ; mcastro@calhfa.ca.gov

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
Cleveland Commons, 60 West Hamilton Avenue, Campbell, Santa Clara County, California 95008 (APN 305-21-003): Charities Housing proposes to develop the Cleveland Commons affordable housing project on a 1.21-acre site (APN 305-21-003) with address 60 West Hamilton Avenue, Campbell, Santa Clara County, California 95008. The site is currently occupied by a vacant bank building that will be demolished to construct a new, four-story building with 92 affordable apartments. The unit mix will be 91 one-bedroom units and one

three-bedroom unit for an on-site manager. A total of 56 on-grade parking spaces will be provided, along with 44 bicycle parking spaces. The ground floor will contain the lobby, offices, community room (about 800 square feet), computer room (about 180 square feet), maintenance room, heat room, storage rooms, bicycle storage, trash area and mailroom. A 4,359 square foot central courtyard will provide quiet common outdoor space for residents. The project includes demolition, reconstruction and trenching work required to provide utilities to the site and any upgrades required in the public right-of-way, including curb, gutter and sidewalk as needed. The project is 100% affordable with 30 units reserved for veterans and 10 units set aside for individuals with developmental disabilities (IDD) and their families. The project has been awarded 30 U.S. Department of Housing and Urban Development (HUD) Veterans Affairs Supportive Housing vouchers (HUD-VASH) by the Housing Authority of County of Santa Clara. The total project cost is estimated to be $80,600,000. Source: (1)

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the proposal is to increase the number of affordable housing units in the City of Campbell and Santa Clara County as a whole. A total of 92 units for veterans and individuals with developmental disabilities will be created by the proposal. Regional Outlook Between now and 2050, best estimates suggest the San Francisco Bay Area's population will rise from nearly 8 million to over 10 million residents and that the number of jobs within the nine counties will climb from 4 million to more than 5 million. This growth will influence what the Bay Area looks like in 30 years, and many questions remain about where these new residents will live and work. In addition to growth, forces outside of the region's control such as climate change, economic booms and busts, and changing technologies will contribute to future uncertainty. The COVID-19 pandemic provides an extreme example of how these unprecedented events can reshape everyday life. The COVID-19 pandemic changed overnight how Bay Area residents live, work and travel. As a regional long-range plan developed during an unprecedented global health crisis, Plan Bay Area 2050 was shaped by and responds to COVID-19's new challenges in several ways. As a result, strategies in each of the four elements of the plan were added or adjusted to respond to the pandemic's effects. Simultaneously, planning assumptions related to future financial projections and population growth were revised to reflect slower short-term growth. While the long-term impacts of this watershed event may change many aspects of life in the Bay Area, Plan Bay Area 2050 plans for the future by centering equity and resilience to uncertainty in each of its strategies. MTC and ABAG define equity for Plan Bay Area 2050 as ''just inclusion in a Bay Area where everyone can participate, prosper and reach their full potential.'' The agencies strive to advance equity through careful consideration of investments and policies that affect historically and systemically marginalized, underserved and excluded groups, including people with low incomes, people with disabilities and communities of color. Each strategy in Plan Bay Area 2050 has been crafted to advance equity, with particular attention paid to the needs of people living in Equity Priority Communities, which are geographic areas that have a concentration of both residents of color and

residents with low incomes, or that have a concentration of residents with low incomes and other factors such as limited English proficiency, seniors or people with disabilities. Most of Plan Bay Area 2050's investments are directed toward residents of Equity Priority Communities or other systemically underserved communities. Among its many equity-advancing components, the plan envisions billions of dollars for affordable housing production and preservation, a universal basic income to support residents' essential needs, investments in means-based transit fare discounts, and subsidies to protect homes and businesses from natural hazards. The project will help to meet the following objectives in Plan Bay Area 2050 Housing Strategies: * H4. Build adequate affordable housing to ensure homes for all. Construct enough deed-restricted affordable homes to fill the existing gap in housing for the unhoused community and to meet the needs of low-income households. * H6. Transform aging malls and office parks into neighborhoods. Permit and promote the reuse of shopping malls and office parks with limited commercial viability as neighborhoods with housing for residents at all income levels. Source: (2) Local Perspective According to the Association of Bay Area Governments (ABAG), Santa Clara County Housing Needs Allocation 2015 to 2023, the City of Campbell should add 2,977 new units by 2023 in order to meet the needs for housing. Source: (3)

Existing Conditions and Trends [24 CFR 58.40(a)]:

Santa Clara County, officially the County of Santa Clara, is the sixth-most populous county in the U.S. state of California, with a population of 1,936,259 as of the 2020 census. Santa Clara County and neighboring San Benito County form the San Jose-Sunnyvale-Santa Clara metropolitan statistical area, which is part of the larger San Jose-San Francisco-Oakland combined statistical area. Santa Clara is the most populous county in the San Francisco Bay Area and in Northern California. The county seat and largest city with a population of 997,368 is San Jose, the 12th-most populous city in the United States, California's third-most populous city, and the most populous city in Northern California. Containing significant portions of Silicon Valley, Santa Clara County is an economic center for high technology and had the third-highest gross domestic product (GDP) per capita in the world as of 2015 behind Zurich and Oslo, according to the Brookings Institution. Located on the southern coast of San Francisco Bay, the urbanized Santa Clara Valley within Santa Clara County contains most of the county's population. As of 2020, Santa Clara County had a median household income of $130,890, the third-highest household income of any county in the nation behind Loudoun County, Virginia and Falls Church, Virginia, and the highest of any county in the Western United States. Campbell is a city in Santa Clara County, California, in the San Francisco Bay Area. As of the 2020 U.S. Census, Campbell's population is 43,959. Campbell is home to the Pruneyard Shopping Center, a sprawling open-air retail complex which was involved in a famous U.S. Supreme Court case that established the extent of the right to free speech in California. Today, the Pruneyard Shopping Center is home to the South Bay offices of the Federal Bureau of Investigation. According to

Census Bureau QuickFacts estimates, there were 16,121 households, with an average of 2.64 persons per household. About 84.1% of residents lived in the same house one year earlier, and 35.6% of residents age 5 and over spoke a language other than English at home. The owner-occupied housing unit rate was 49.2%. The median value of owner-occupied housing units was $1,156,000, and the median gross rent was $2,323. Source: (4) Site Characteristics The subject property is L-shaped or flag-shaped and is comprised of one parcel (APN 305-21-003) that is 1.21 acres in size with address 60 West Hamilton Avenue, Campbell, Santa Clara County, California 95008. The site is improved with a former bank building and paved parking lot. Landscaping and trees line the parking lot. The building was constructed in ca. 1970. The site is located near the intersection of Winchester Boulevard and West Hamilton Avenue, at the northern end of Downtown Campbel. Highway 17 lies to the east; the San Tomas Expressway to the west. The property lies between two bank buildings to the east and west; West Hamilton Avenue lies to the north with retail/commercial beyond; multifamily residential lies south of the site. Source: (5) Trends The South Bay (Santa Clara County) is projected to see substantial growth--73-percent growth in households and 46-percent growth in employment relative to 2015--leading to an increased share of the region's households and employment. The City of Campbell Housing Element Annual Progress Report (APR) for 2024 shows the progress toward meeting the Regional Housing Needs Allocation for the City for years 2023 through 2031 were 300 units permitted. Source: (3) (6) (7) These trends are likely to continue in the absence of the project. The project will help to stem the trends outlined above by providing affordable housing units targeted to the specific needs of veterans and the underserved community of individuals with developmental disabilities (IDD).

Maps, photographs, and other documentation of project location and description:
Lead Agency Agreeement(1).pdf
CalHFA Addendum(1).pdf
package for Calhfa MIP application reduced.pdf
Project Information.pdf

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:
Signed_Cleveland Commons_EA Signature Page.pdf

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
TBD	Public Housing	Project-Based Voucher Program	$23,392,800.00

Estimated Total HUD Funded, Assisted or Insured Amount: $23,392,800.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $80,600,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☑ No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. There is one major airport and one military airfield within 15 miles of the project site. There are no minor airports within 15 miles. San Jose International Airport is located 4.89 to the north. Moffett Field military airfield is located 9.93 miles north-northwest of the site. The project site does not lie within any airport clear zone or accident potential zone. Source Documentation: (7) (8) (9) (10)
Coastal Barrier Resources Act Coastal Barrier Resources Act, as	☐ Yes ☑ No	This project is located in a state that does not contain CBRS units. Therefore,

amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		this project is in compliance with the Coastal Barrier Resources Act. 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). Areas so designated 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 U.S. Virgin Islands, and the Great Lakes, and consist of 857 units. There are no Coastal Barrier Resources in California. Source Documentation: (11)
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	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The project involves the development of real property. The project is not located within a FEMA identified Special Flood Hazard Area. The project site is located in Zone X: Areas of Minimal Flooding. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in Zone X. The subject property flood hazard designation is depicted on FIRM Map Number 06085C0237H, effective May 18, 2009. Flood insurance is not required. There is no impact to floodplains as a result of the proposal. Source Documentation: (12)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		

Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☑ Yes ☐ No	The project's county or air quality management district is in non-attainment status for the following: Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. See attached analysis. Construction emissions resulting from the implementation of the proposed project are below the thresholds of significance for construction. No adverse effects on air quality would occur due to construction of the proposed project. The operational emissions associated with the proposed project are below the General Conformity de minimis level and below the BAAQMD thresholds, therefore, no adverse effects on air quality would occur due to operation of the proposed project. No adverse effects on air quality would occur due to operation of the proposed project. The proposed project is consistent with the state and local reduction goals for transportation, energy, and other emissions associated with land use and development. In short, the project was shown it would not exceed 1,100 MT CO2E and would not represent a substantial source of GHG emissions. Therefore, the proposed project would not conflict with or block the implementation of a plan intended to reduce GHG emissions. There are no significant TAC sources within a 1,000-foot Sphere of Influence. There is no impact in this regard. Excess cancer risks or further refinement were not identified in this screening-level analysis. Conclusion Current BAAQMD Best Management Practices to control particulate matter and diesel exhaust during construction are required.

		Implementation of mitigation reduces impacts from PM2.5 and PM10 (diesel particulate matter and dust) to less than significant. Mitigations Required: AQ1 & AQ2 Source Documentation: (7) (8) (13) (14) (15)
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☑ No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The City of Campbell is located in Santa Clara County. The project site is not located in the California Coastal Zone. The site is about 10 miles from the San Francisco Bay shoreline, which is under the jurisdiction of the San Francisco Bay Conservation and Development Commission. However, the site is not required by the BCDC to obtain a permit either, due to distance. A Coastal Development Permit is not required. Source Documentation: (7) (8) (16) (17)
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☑ Yes ☐ No	Site contamination was evaluated as follows: ASTM Phase I ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. See attached analysis. Conclusion The site has a Vapor Encroachment Condition (VEC) from off-site sources that requires a Vapor Intrusion Mitigation System (VIMS). Due to soil conditions, a Health and Safety

		Plan (HSP) for worker safety during construction is required, as well as a Site Management Plan (SMP). The SMP has been conditionally accepted by the regulatory oversight agency. A draft VIMS design and Operations & Maintenance Plan (O&M Plan) have been submitted to the oversight agency and is currently under review. The subject property contains a commercial building constructed in ca. 1966 to be demolished. Testing confirmed the absence of lead-based paint and the presence of some asbestos. Although the area is not large enough to require compliance authorization under the National Emission Standards for Hazardous Air Pollutants (NESHAP), as enforced by the Bay Area Air Quality Management District, mitigations is required for property handling and disposal of asbestos during demolition. If present, radon gas would be blocked from entering the building by the required VIMS system; therefore post-construction testing appears unwarranted. Mitigations Required: CT1, CT2, CT3 and CT4. Source Documentation: (18) (19) (20) (21) (22)
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☑ Yes ☐ No	This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act. The U.S. Fish and Wildlife Service was contacted on July 6, 2026, for a list of number of endangered and threatened species that may occur in the project location or be affected by the proposal. These species are listed below. Species of Concern Birds: * California Condor (Gymnogyps californianus * California Least Tern (Sternula antillarum browni) * California Ridgway's Rail (Rallus obsoletus obsoletus) Reptiles: *

		Northwestern Pond Turtle (Actinemys marmorata) Amphibians: * California Red-legged Frog (Rana draytonii) * California Tiger Salamander (Ambystoma californiense) * Foothill Yellow-legged Frog (Rana boylii) Insects: * Monarch Butterfly (Danaus Plexippus) (Proposed) Project Impacts The project site is currently covered in imperious surfaces (building, driveway, paved parking lot), except for small, landscaped areas. The site does not contain any suitable habitat for special-status plants and animals. There is no riparian habitat on or near the property. Arborist Report A Preliminary Arborist Report was prepared for the project by HortScience in 2024. Excerpts follow. Thirty-one (31) trees representing 14 species were assessed by HortScience. Six off-site trees, including two street trees, were included in the assessment. Overall, twenty (20) trees were in fair condition, seven were poor, and four trees were in good condition. In general species present are commonly observed in the region. None were native to California. All trees appeared to have been planted as part of the existing landscape treatment. Protected Trees in Campbell The City of Campbell defines a Protected Tree on properties other than single-family residential as any tree with a diameter of 12 inches or greater, measured at four feet above grade. Nineteen (19) trees met this criterion. Permits and replacement planting are required for Protected trees. Suitability for Preservation Trees that are preserved on sites where development or other improvements are planned must be carefully selected to make sure that they may survive construction impacts, adapt to a new environment and perform well in the landscape. The goal is to identify trees

		that have the potential for long-term health, structural stability and longevity. Preliminary Tree Preservation Guidelines All on-site trees will be removed. Trees located off-site but close to the project boundary will be retained. The HortScience report provided design recommendations and pre-demolition and pre-construction treatments and recommendations that should be followed. Finding There is No Impact or No Effect to listed species as a result of the project. However, there are numerous mature trees around the site that could harbor nesting birds. Mitigations Required: ES1 & ES2. Source Documentation: (7) (8) (23) (24)
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☑ No	There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. See attached analysis. Conclusion There are no current or planned above-ground storage tanks (ASTs) within a mile that could pose an explosive or flammable hazard to the project or future residents. Source Documentation: (7) (8) (25) (26) (27) (28)
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☑ No	The project includes activities that could convert agricultural land to a non-agricultural use, but "prime farmland","unique farmland", or "farmland of statewide or local importance" regulated under the Farmland Protection Policy Act does not occur on the project site. The project is in compliance with the Farmland Protection Policy Act. Prime farmland is land best suited for producing food, forage, fiber, and oilseed crops and also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land but not urban

		built-up land or water). The Web Soil Survey produced by the United States Department of Agriculture shows that 100% of the site is underlain by Urban land-Stevescreek complex, 0 to 2 percent slopes. The project will not affect farmlands. No federally designated Farmlands have been identified within the project site. Source Documentation: (7) (29) (30)
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☑ No	This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. The project involves the development of real property. The project is not located within a FEMA identified Special Flood Hazard Area. The project site is located in Zone X: Areas of Minimal Flooding. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in Zone X. The subject property flood hazard designation is depicted on FIRM Map Number 06085C0237H, effective May 18, 2009. Flood insurance is not required. There is no impact to floodplains as a result of the proposal. Source Documentation: (12)
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☑ Yes ☐ No	Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. See attached analysis. The County of Santa Clara, as Agency Official, found the project, as proposed, will have no effect on historic properties as none were identified within the Area of Potential Effects. The Archaeological and Tribal Monitoring Plan developed in consultation with tribes, will a requirement of approval of the Part 58 review. Consultation Consultation with the State Historic Preservation Officer (SHPO) under Section 106 of the National Historic

		Preservation Act was initiated by the County of Santa Clara with a letter and package of information on July 30, 2026. On August 31, 2026, 30 days elapsed and the SHPO did not object to the determination no historic properties affected by the Undertaking. Per 36 CFR s. 800.3(c)(4), this concludes Section 106. Mitigation Required: HP1 Source Documentation: (31) (32) (33) (34) (35) (36) (37) (38) (39)
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	A Noise Assessment was conducted. The noise level was normally unacceptable: 71.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. See attached analysis. The subject property is subjected to a Future Noise Environment of up to 71 dBA DNL, which is considered ''Normally Unacceptable'' for residential development by HUD standards. Mitigations are required to bring interior noise levels below 45 dBA DNL, including sound-rated window and wall components and mechanical ventilation. Common outdoor space is exposed to a Future Noise Environment of up to 60 dBA DNL. This is considered ''Acceptable'' for common outdoor space by HUD. No mitigation is needed for outdoor space. Mitigations Required: N1 & N2. Source Documentation: (40)
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☑ No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. The project activities do not affect a sole source aquifer, as there are no aquifers subject to a MOU between EPA and HUD in Santa Clara County. The nearest Sole Source Aquifer (SSA) is the Santa Margarita Aquifer, Scotts Valley SSA, over 12 miles to the south of the project area. There

		are no impacts to Sole Source Aquifers. Source Documentation: (41)
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☑ No	The project will not impact wetlands. The project is in compliance with Executive Order 11990. The site is fully developed; there are no wetlands on or near the site. There are no riparian habitats on or near the site. There are no impacts to wetlands anticipated as a result of the project. The nearest wetland is Las Gatos Creek, 0.84 miles to the southeast. Urban development separates the site from the nearest wetland. There are no impacts to wetlands anticipated as a result of the project. Source Documentation: (42)
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☑ No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. No wild and scenic rivers are located within Santa Clara County. The nearest designated Wild and Scenic River to the Cleveland Commons project site in Campbell, California is the Big Sur River. Big Sur River (Monterey County) is located approximately 70 to 75 miles southwest of the project site in a straight line (or roughly 90 to 100 driving miles). Source Documentation: (43)
HUD HOUSING ENVIRONMENTAL STANDARDS		

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor Adverse Impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The current General Plan and Zoning Designation is Commercial Corridor Mixed-Use After review of the Campbell Municipal Code (CMC), Multi-Family Development and Design Standards (MFDDS), Winchester Boulevard Master Plan, and California Government Code Section 65913.4 (Streamlined Ministerial Approval Process), the Community Development Director of the City of Campbell made the required findings and approved the project in April 2026. The project is consistent with local and regional plans for streamlining approval of affordable housing projects. There is no impact in this regard. The scale and urban design (four-story building) is consistent with the Winchester Boulevard Master Plan. The project is entitled. There is no impact in this regard. Source Documentation: (45) (46)	
Soil Suitability / Slope/ Erosion / Drainage and	3	The site is underlain by Holocene-age alluvial deposits (Qha). Alluvial deposits generally consist of a mixture of	G1. All recommendations contained in the Geotechnical Investigation prepared for the project by

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Storm Water Runoff		fine-grained and coarse-grained deposits. The results of CPTs and borings indicate the site is underlain by approximately 10 to 15 feet of soft to stiff sandy clay with variable amounts of sand and gravel and occasional layers of medium dense silty sand and clayey sand. Below depths of 10 to 15 feet below ground surface (bgs), the alluvial deposits generally consist of interbedded layers of stiff to very stiff clay with variable amounts of sand and gravel, medium dense clayey gravel with sand, and medium dense to very dense sand with variable amounts of silt, clay and gravel that extend to the maximum depth explored of 43 feet bgs. Based on the results of the Rockridge geotechnical investigation, the building can be constructed as planned, provided the recommendations in the report are incorporated into the project plans and specifications and implemented during construction. The primary geotechnical concern for the proposed development is providing adequate support for the proposed structure. The upper 10 to 15 feet of soil encountered in the building footprint is relatively weak and is moderately to highly compressible. Therefore, the proposed building should be supported on spread footings bearing on improved soil or a mat foundation bearing on	Rockridge Geotechnical and dated July 10, 2026, or later, shall be followed. SW1. Stormwater Requirements: This application is subject to the new stormwater requirements detailed in the most recent Municipal Regional Permit (MRP 3.0). Specifically, the construction / reconstruction of any impervious improvements within the public right-of-way will now require the associated stormwater runoff to be treated. The construction, operation & maintenance of said treatment in the right-of-way will be the applicant's sole responsibility. The building permit and grading permit will not be issued until all Public Works Conditions of Approval have been satisfied. The following comments are based on revised Civil sheets C5.0 and C5.1 received from HMH on 3/2/26 and revised sheet C3.1 received on 3/3/26. SW2. Grading and Drainage Plan: Prior to issuance of any building permits for the site, the applicant shall conduct hydrology studies based on a ten-year storm frequency, prepare an engineered grading and drainage plan, and pay fees

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		over-excavated and recompacted soil. The site and surrounds are flat and there are no slopes on the near the site. The site as it exists now is not subject to erosion. However, if not properly managed, erosion could occur during construction of the project. Plans demonstrating the Best Management Practices for erosion control, sedimentation and water quality impacts to the maximum extent practicable must be submitted for review and approval by the City of Campbell. Stormwater runoff from urbanized areas carries large amounts of pollution to creeks and San Francisco Bay. Local agencies in urbanized portions of the Bay Area are responsible for controlling stormwater pollution by complying with the Municipal Regional Stormwater Permit (MRP), reissued by the Regional Water Quality Control Board in May 2022. The Low Impact Development (LID) Technical Design Manual is a set of guidelines which requires certain projects to incorporate sustainable LID strategies that encourage infiltration and minimize the introduction of pollutants into downstream receiving waters. The City of Campbell has adopted this manual to satisfy the requirement in their municipal storm water permit. LID applies to the project as it will disturb	required to obtain necessary grading permits. Prior to occupancy, the design engineer shall provide written certification that the development has been built per the engineered grading and drainage plans. SW3. State General Construction Activity Permit: Prior to issuance of any grading or building permits, the applicant shall comply with the State General Construction Activity Permit requirements including paying fees, filing a Notice of Intent and providing a Storm Water Pollution Prevention Plan (SWPPP). The applicant shall provide the City with a copy of the filed Notice of Intent and SWPPP. SW4. Stormwater Pollution Prevention Measures: Prior to issuance of any grading or building permits, the applicant shall comply with the National Pollution Discharge Elimination System (NPDES) permit requirements, Santa Clara Valley Water District requirements, and the Campbell Municipal Code regarding stormwater pollution prevention. Specifically, the project must include source control, site design and

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		more than 10,000 square feet of area. LID treatment measures include bioretention areas, flow-through planters, pervious pavement, infiltration trenches or subsurface infiltration systems and rainwater harvesting systems. All development project sites are required to use Best Management Practices (BMPs), including implementing sediment and erosion control plans. Projects disturbing one acre or more of land, such as this one, must obtain coverage under the Statewide Construction General Permit. The subject property is already improved with a commercial building, and paved parking areas, as well as vehicle circulation. The project will not introduce new impervious surfaces that could cause additional stormwater runoff over existing conditions. There will be 17% landscaped areas and 47% impervious surfaces. Conclusion With the inclusion of landscaping on the site, there is a net decrease in impervious surfaces. There are existing stormwater facilities that serve the current site improvements. There will not be an increase in stormwater runoff as a result of the project. There is no impact in this regard. Mitigation is needed to ensure the project conforms to the National Pollutant Discharge Elimination System (NPDES) Permit. Source	treatment measures to achieve compliance with Provision C.3. of the NPDES Permit. Measures may include, but are not limited to, minimization of impervious surface area, vegetated swales, infiltration areas, and treatment devices. The primary objectives are to improve the quality and reduce the quantity of stormwater runoff to the bay. Prior to issuance of any building permits: a. The applicant's designer or engineer shall submit the required certification indicating that sizing, selection, and design of treatment BMP's for the project site has been completed to meet the requirements of the City of Campbell's NPDES permit. b. The applicant shall sign the ''Covenants for the Operation and Maintenance of Stormwater Facilities'' and submit a Stormwater Management Plan. Prior to occupancy: a. A qualified BMP certifier is required to inspect the stormwater management facilities, submit a complete set of as-built drawings to Public Works Engineering, and certify on these drawings that: 1. The stormwater management facilities were

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Documentation: (1) (7) (45) (47) (48) (49) (50)	constructed in compliance with the approved plans. 2. The as-built drawings show all pertinent constructed dimensions, elevations, shapes, and materials. 3. All variations in construction from the approved design plan have been identified, including omissions to and additions from the approved plan. 4. Any changes are in conformance with local, state, or federal regulations. SW5. Maintenance of Stormwater Facilities: Owner(s), current and future, are required to maintain the landscaped bio-treatment areas in the public right of way. Execution of a Maintenance Agreement will be required prior to Building Permit Final.
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	See attached analysis. Based on the results of the Rockridge geotechnical investigation, the building can be constructed as planned, provided the recommendations in the report are incorporated into the project plans and specifications and implemented during construction. The primary geotechnical concern for the proposed development is providing adequate support for the proposed structure. The upper 10 to 15 feet of soil encountered in the building	G1. All recommendations contained in the Geotechnical Investigation prepared for the project by Rockridge Geotechnical and dated July 10, 2026, or later, shall be followed.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		footprint is relatively weak and is moderately to highly compressible. Therefore, the proposed building should be supported on spread footings bearing on improved soil or a mat foundation bearing on over-excavated and recompacted soil. The project does not involve pile driving or other extreme construction noise generating equipment. The project is subject to Conditions of Approval to control noise during construction, as required by the City of Campbell. Requirements include limiting the hours of construction to 8:00 AM to 5:00 PM daily, Monday through Friday; Saturday hours of construction are limited to 9:00 AM to 4:00 PM with no construction activity on Sundays or National Holidays. Source Documentation: (7) (8) (45) (47)	
SOCIOECONOMIC			
Employment and Income Patterns	2	The project site is located on a 1.21-acre infill parcel within an urbanized commercial and mixed-use corridor. Employment Opportunities Construction of the proposed project will generate short-term, temporary construction employment. Pursuant to California Government Code Section 65913.4 and project conditions of approval, construction activities will comply with applicable labor standards, including prevailing wage requirements and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		apprenticeship programs. Long-term operational employment will be minimal, limited primarily to on-site property management, routine maintenance, and visiting social service staff. Because the site is currently occupied by a vacant bank structure, project implementation will not result in the displacement of existing jobs or operating businesses. Income Patterns and Population The development is 100 percent affordable housing designed specifically to serve lower-income senior households, with 30 units reserved for veterans receiving HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers and 10 units set aside for individuals with developmental disabilities. By adding 92 dedicated affordable units in an area characterized by high land and housing costs, the project expands affordable residential options for fixed- and low-income residents, preventing displacement of vulnerable populations without altering overall regional income patterns or creating an imbalance between local jobs and housing. Community and Economic Context The project site is surrounded by existing commercial and residential land uses along West Hamilton Avenue and South Winchester Boulevard. Placing lower-income residents in close proximity to nearby retail,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		services, and public transit will generate incremental support for local businesses while providing residents with direct access to essential neighborhood services. Conclusion The project will not adversely affect local employment or income patterns, and will provide a direct social and economic benefit by increasing affordable housing opportunities within the community. Source Documentation: (1) (45) (51) (52) (53) (54)	
Demographic Character Changes / Displacement	2	Demographic Character Changes Under standard HUD guidelines (the ''Keating Memo'' baseline of two persons per bedroom), maximum allowed occupancy for the project's 91 one-bedroom units (182 residents) and single three-bedroom manager unit (6 residents) is estimated at 188 maximum residents. Even under California's expanded two-persons-per-bedroom-plus-one rule (which yields a theoretical ceiling of 280 occupants), this increment represents less than 0.5 percent of the City of Campbell's population of approximately 43,000 residents. Because the development replaces a vacant commercial bank with a 100 percent affordable senior residential community--specifically serving low-income seniors, veterans, and individuals with developmental disabilities--it	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		will not alter the surrounding land use pattern, induce unplanned regional population growth, or significantly shift the demographic character of the neighborhood. Consequently, the project's demographic impacts will be negligible and less than significant. Displacement The Uniform Relocation Act (URA), passed by Congress in 1970, establishes minimum standards for federally-funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally-funded projects. Section 205 of the URA requires that, ''Programs or projects undertaken by a federal agency or with federal financial assistance shall be planned in a manner that (1) recognizes, at an early stage in the planning of such programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of such problems in order to minimize adverse impacts on displaced persons and to expedite program or	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		project advancement and completion.'' The existing bank building is vacant; no businesses or residents will be displaced by the project. A conforming Relocation Plan is not required. Source Documentation: (1) (7) (45) (51) (52) (53) (54) (55) (56)	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	See attached analysis. The estimated increment of 10 to 16 students represents a small addition to local enrollment across the three serving schools. Local public schools maintain adequate existing capacity to absorb these students without requiring the expansion or construction of new educational facilities. Furthermore, pursuant to Senate Bill 50 (California Government Code Section 65995), payment of statutory school impact fees prior to building permit issuance constitutes full and complete mitigation under CEQA and HUD NEPA guidelines. The project will have a less than significant impact on local educational facilities. The project site is situated in an established urban setting with direct access to regional and municipal cultural resources via local roadway arterials and Valley Transportation Authority (VTA) public transit routes. There are adequate cultural facilities nearby to serve future residents. In addition, the San Francisco Bay Area and the city of San Francisco are rich in	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		cultural facilities and are accessibly by public transit, providing even more opportunities to experience culture outside of the immediate area. No adverse impacts were identified. Source Documentation: (1) (8) (45) (51) (52) (53) (54) (57)	
Commercial Facilities (Access and Proximity)	1	The proposed Cleveland Commons project is situated in an established commercial and mixed-use corridor along West Hamilton Avenue and South Winchester Boulevard, providing future residents with direct access to essential retail, dining, and daily commercial services. The project site scores high in local walkability, featuring continuous sidewalks, signalized pedestrian crossings with curb ramps, and minimal topographic variation. Nearest Commercial Destinations & Walkability * Grocery Store - Safeway: Located at 2340 Winchester Boulevard (Hamilton Plaza), approximately 0.3 miles (a 5-minute walk) north of the project site. The route is highly walkable via flat, fully improved pedestrian sidewalks and signalized crosswalks across West Hamilton Avenue and Winchester Boulevard. * Pharmacy - Walgreens: Located at 1660 S. Winchester Boulevard, approximately 0.2 miles (a 4-minute walk) south of the site. Residents can access the pharmacy directly via	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		continuous, ADA-compliant public sidewalks along South Winchester Boulevard. * Shopping Center / Mall - Campbell Gateway Square & The Pruneyard: o Campbell Gateway Square: Located directly across Winchester Boulevard to the east (~0.1 miles / 2-minute walk), providing immediate neighborhood retail, services, and casual dining. o The Pruneyard: Located approximately 1.5 miles (a 5-minute drive or direct bus ride via VTA Route 60) southeast at Campbell Avenue and S. Bascom Avenue. The Pruneyard is a major open-air lifestyle shopping center featuring grocery options (Trader Joe's), retail stores, medical offices, financial services, and restaurants. Conclusion Because daily goods, health services, and retail amenities are located within immediate walking distance or easily accessible via public transit, the project will not place an undue burden on local commercial infrastructure and will provide future residents with convenient access to commercial services. A small benefit has been identified. Source Documentation: (1) (45) (51) (52) (53) (54)	
Health Care / Social Services (Access and Capacity)	2	To address the specific health and social service needs of these target populations on-site, the building's ground floor	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		incorporates dedicated management and social service offices, meeting areas, a 180-square-foot computer room, and an 800-square-foot community room. These on-site facilities enable service providers--including case managers, HUD-VASH support staff, and specialized IDD care coordinators--to deliver direct, non-emergency supportive services, life-skills training, and care coordination to residents within their living environment. The project site is situated within an urban area served by established regional healthcare networks and community social service organizations. Primary and specialized medical care facilities located within close proximity include: * Good Samaritan Hospital: Located at 2425 Samaritan Drive in San Jose, approximately 2.8 miles south of the project site, offering comprehensive emergency, inpatient, and outpatient medical services. * Santa Clara Valley Medical Center (SCVMC): Located at 751 S. Bascom Avenue in San Jose, approximately 2.5 miles northeast, serving as a major regional public safety-net hospital and trauma center. * Kaiser Permanente Campbell Medical Offices: Located at 220 E. Hacienda Avenue, approximately 1.5 miles southeast, providing outpatient clinical and primary care	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		services. * VA Palo Alto Health Care System - San Jose Clinic: Located at 80 Great Oaks Boulevard in San Jose, accessible via local transit for veteran health services. Routine health and social service needs generated by the project's residents will be supported through on-site service spaces and existing medical facilities, which maintain adequate operational capacity. Direct access to VTA bus and light rail lines along West Hamilton Avenue and South Winchester Boulevard enables residents to reach local clinics and medical centers via public transit. Consequently, the project will not result in adverse physical impacts associated with the need for new or physically altered off-site healthcare or social service facilities, and it will provide a direct social benefit to the community by integrating supportive services with affordable housing. Source Documentation: (1) (45) (51) (57)	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The proposed Cleveland Commons project involves the construction of a 92-unit affordable multi-family residential building on a 1.21-acre infill site. The site is currently occupied by a vacant commercial bank building, which will be demolished to construct the new development. The project will generate short-term solid waste	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		during demolition and construction activities, as well as ongoing operational solid waste typical of multi-family residential uses. Construction-Related Waste Demolition of the existing vacant bank structure and construction of the four-story residential building will generate concrete, asphalt, wood, metal, and general construction debris. Pursuant to the 2025 California Green Building Standards Code (CALGreen, Title 24, Part 11) and the City of Campbell Municipal Code, the project is required to divert at least 65 percent of non-hazardous construction and demolition debris away from landfills through recycling, reuse, or salvage. Compliance with these state and local mandates will minimize construction-related landfill waste. Operational Waste, Recycling, and Organics Collection Waste collection and recycling services for the City of Campbell are provided by West Valley Collection & Recycling (WVCR), with regional solid waste disposed of at permitted facilities such as the Newby Island Landfill in San Jose. The project includes a dedicated, enclosed ground-floor trash and recycling room (Sheet G.3) designed to satisfy municipal, CALGreen, and WVCR collection requirements. Dedicated waste streams are provided on-site for general refuse, commingled	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		recyclables, and organic waste (food scraps/yard waste) to comply with California Senate Bill 1383 (SB 1383) organic waste diversion mandates. The proposed service capacity and collection schedule include: * Solid Waste (Trash): Designed to accommodate the estimated 9.1 cubic yards per week requirement using one 4-cubic-yard bin and three 95-gallon carts serviced twice weekly (total capacity: 10.8 cubic yards per week). * Recycling: Designed to accommodate the estimated 9.1 cubic yards per week requirement using one 4-cubic-yard bin and three 95-gallon carts serviced twice weekly (total capacity: 10.8 cubic yards per week). * Organics: Designed to accommodate the estimated 920 gallons per week requirement using one 2-cubic-yard bin and three 95-gallon carts serviced twice weekly (total capacity: 1,378 gallons per week). Landfill and System Capacity Regional receiving facilities maintain sufficient permitted daily throughput and long-term capacity to absorb the projected solid waste increment from the 92 residential units without exceeding landfill capacities or impairing local waste reduction goals. Furthermore, the project complies with all state and local waste management, recycling, and organics diversion	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		regulations. Therefore, solid waste disposal and recycling impacts will be less than significant or not adverse. Source Documentation: (1) (45) (51)	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The site is located within an established urban area with existing wastewater conveyance and treatment infrastructure. Wastewater generated by the project will consist of standard domestic sewage from residential units, common community spaces, and management offices. Wastewater Collection and Treatment Providers Sanitary sewer collection and local conveyance services for the project site are provided by the West Valley Sanitation District (WVSD). Wastewater collected by WVSD is conveyed to the San Jose-Santa Clara Regional Wastewater Facility (RWWF) located in San Jose. The RWWF provides advanced secondary and tertiary treatment for several Silicon Valley municipalities. On-Site Infrastructure and Utility Connections The project plans include new utility trenching and connections to existing mainlines. As shown on the Civil Utility Plan (Sheet C4.0), sanitary sewer lateral connections will connect the building to existing sanitary sewer mains running along West Hamilton Avenue and South Winchester Boulevard.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Existing water meters and sewer cleanouts will be relocated or installed on private property behind the public right-of-way line pursuant to City of Campbell Public Works. In accordance with local sanitary sewer agency requirements, the ground-floor trash room is fully covered and enclosed to prevent stormwater from entering the sanitary sewer system via floor drains. System Capacity and Wastewater Flow Increments The San Jose-Santa Clara RWWF has an approved treatment capacity of 167 million gallons per day (MGD) and currently operates well below its permitted capacity limit. The incremental wastewater flow generated by the 92 residential units--estimated at approximately 10,000 to 15,000 gallons per day based on standard multi-family generation rates--will not exceed the capacity of the local collection system or the regional treatment facility. Conclusion WVSD and the City of Campbell Public Works Department reviewed the project plans and determined that existing sewer mains and regional treatment infrastructure are adequate to accommodate the projected flow without requiring off-site mainline expansions or the construction of new treatment facilities (Findings #19 & #33). Therefore, wastewater and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		sanitary sewer impacts will be less than significant or not adverse. Source Documentation: (1) (45) (51) (52) (53) (54)	
Water Supply (Feasibility and Capacity)	2	The project site is located in an established urban setting with direct connections to municipal water supply and distribution infrastructure. Water Service Provider & Source Supply Retail water service for the City of Campbell is provided by San Jose Water Company (SJWC), an investor-owned public utility regulated by the California Public Utilities Commission (CPUC). SJWC obtains its water supply from three primary sources: * Imported Water: Purchased from Valley Water (Santa Clara Valley Water District), originating from the State Water Project (SWP) and the Central Valley Project (CVP). * Local Groundwater: Pumped from the Santa Clara Subbasin, managed and artificially recharged by Valley Water. * Local Surface Water: Sourced from local mountain watersheds in the Santa Cruz Mountains. Water Demand & Infrastructure Operational water demand for the project will consist of indoor domestic residential use and low-water-use outdoor landscape irrigation. * Indoor Water Conservation: In accordance with the 2025 California Green Building Standards Code (CALGreen, Title 24, Part 11) and Title 24	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Energy/Plumbing Codes, the building design incorporates high-efficiency water fixtures, low-flow toilets, and aerated faucets to minimize indoor consumption. * Landscape Irrigation: The project landscape and irrigation plans will comply with the California Model Water Efficient Landscape Ordinance (MWELO) and City of Campbell regulations. The design prioritizes water-wise, drought-tolerant plants, sub-surface drip irrigation systems, and smart evapotranspiration-based irrigation controllers. * On-Site Connection & Distribution: As depicted on the Utility Plan, water service connections and fire service lines will connect to existing SJWC water mains running along West Hamilton Avenue and South Winchester Boulevard. Existing water meters will be relocated or installed on private property behind the public right-of-way line. Regional Capacity and Long-Term Availability Based on Valley Water's updated Urban Water Management Plan (UWMP) and Water Supply Master Plan 2040, as well as SJWC's UWMP, projected regional water supplies are sufficient to meet anticipated demand across average, single-dry, and multiple-dry year scenarios through buildout of the Campbell General Plan. Conclusion The incremental water demand from 92	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		residential units was evaluated during local development review. The City of Campbell Community Development Director determined that existing water supply allocations and conveyance infrastructure are adequate to serve the project without requiring new water rights, off-site mainline expansions, or the construction of new regional water treatment facilities (Findings #19 & #33). Therefore, water supply impacts will be less than significant or not adverse. Source Documentation: (1) (45) (51) (52) (53) (54) (58)	
Public Safety - Police, Fire and Emergency Medical	2	The site is located in an established, urbanized residential and commercial corridor along West Hamilton Avenue and South Winchester Boulevard, where full public safety and emergency response services are actively provided. Police Services Police protection services are provided by the Campbell Police Department (CPD), headquartered at 70 N. First Street, approximately 1.0 mile southeast of the project site. CPD operates five beats across the city, providing 24-hour patrol, traffic enforcement, investigation, and crime prevention services. While the addition of 92 residential units serving low-income households, veterans, and individuals with developmental disabilities will generate an incremental	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		increase in calls for service, the City of Campbell Community Development Director determined that existing police personnel, facilities, and equipment are sufficient to serve the site without requiring the construction or expansion of police facilities. Fire protection Fire protection, fire prevention, search and rescue, and primary Advanced Life Support (ALS) emergency medical services are provided under contract by the Santa Clara County Fire Department (SCCFD). The project site is served primarily by two City-owned, SCCFD-operated stations: Campbell Fire Station at 123 Union Avenue, located roughly 1.0 mile southeast, and Sunnyoaks Fire Station / McCormack Training Center at 485 W. Sunnyoaks Avenue, located about 1.8 miles southwest. SCCFD deploys 24-hour ALS firefighter/paramedics, Type 1 engines, ladder trucks, and heavy rescue units to deliver initial fire attack and emergency medical response within standard urban response time goals of under eight minutes, with secondary ambulance ground transport provided through Santa Clara County EMS third-party providers. Conclusion The project plans were thoroughly reviewed by the Campbell Police Department, Santa Clara County Fire District, and Building	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Division, confirming that emergency response times will be maintained and that project fire flows and vehicle access comply fully with local and state standards. Because the development will not require the construction or physical expansion of new fire or police facilities that could cause significant environmental effects, public safety impacts will be less than significant or not adverse. Source Documentation: (1) (45) (51) (53)	
Parks, Open Space and Recreation (Access and Capacity)	2	The project will introduce an estimated population increment of approximately 100 to 188 residents to the area, generating a modest demand for public parks, open space, and recreational facilities. To address recreational demand on-site, the building design features a 4,359-square-foot central outdoor courtyard at grade, providing quiet common open space for residents, complete with seating areas, landscaped gardens, water features, and synthetic turf pet relief areas. Interior community spaces include an 800-square-foot community room, a 180-square-foot computer room, and additional social service office spaces. While the applicant requested a waiver under State Density Bonus Law for standard municipal on-site common open space square footage, the provided private	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and common amenities offer adequate immediate outdoor relief for the building's residents. Off-site public park and recreational needs are well served by existing City of Campbell facilities located within close proximity to the project site. Campbell Park, situated approximately 0.7 miles to the southeast along the Los Gatos Creek Trail corridor, offers lighted sports courts, playgrounds, open turf areas, and direct access to regional multi-use pedestrian and bicycle paths. The Campbell Community Center, located approximately 0.8 miles south along South Winchester Boulevard, provides a major civic hub featuring a track, fitness facilities, multi-purpose sports fields, tennis courts, and public recreational classes. Pursuant to Chapter 20.24 of the Campbell Municipal Code (Park Impact Fees and Park Land Dedication Subdivisions), the applicant is required to pay statutory park in-lieu impact fees prior to occupancy. The resulting fee payment--calculated based on the 92 new dwelling units and adjusted per local affordable housing overlay incentives--serves to fund the acquisition, maintenance, and enhancement of public park facilities across the city. Because the project includes on-site open space amenities, is situated near established public	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		parks and trails, and will pay all required municipal park impact fees, the addition of residents will not result in substantial physical deterioration of existing parks or require the construction or expansion of new public recreational facilities that could cause significant environmental effects. Therefore, impacts on parks, open space, and recreation will be less than significant or not adverse. Source Documentation: (1) (45) (51) (57) (58)	
Transportation and Accessibility (Access and Capacity)	2	Located at the southeast corner of West Hamilton Avenue and South Winchester Boulevard, the project is situated within an established urban transportation network that provides robust multi-modal access for motorists, public transit riders, bicyclists, and pedestrians. The project site benefits from immediate proximity to regional public transit infrastructure operated by the Santa Clara Valley Transportation Authority (VTA). Express and local VTA bus routes run directly along West Hamilton Avenue and South Winchester Boulevard, with existing bus stops located immediately adjacent to the site. Additionally, the site is situated within one-half mile of the Winchester Light Rail Station, providing direct rail connections to Downtown San Jose, Mountain View, and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		regional transit hubs. To encourage non-motorized transportation and reduce vehicle reliance, the building design provides 22 secured long-term bicycle parking spaces and 3 short-term bicycle spaces, exceeding municipal standards. Vehicular access to the site is provided via a designated access driveway off South Winchester Boulevard, leading to 56 surface parking spaces positioned at the rear of the building. Under State Density Bonus Law and local affordable housing overlay provisions, lower parking ratios apply due to the project's 100 percent affordability and proximity to accessible bus corridors. The project incorporates a 25-foot-wide emergency apparatus access drive and a 20-foot-wide emergency ingress/egress easement connecting Winchester Boulevard to Dunster Drive, ensuring full pass-through access for emergency vehicles without disrupting surrounding neighborhood traffic flows. Public Works Conditions of Approval require dedicated frontage dedications, sidewalk reconstruction, curb and gutter upgrades, and pavement restoration along West Hamilton Avenue and South Winchester Boulevard to maintain safe roadway geometry and sight distances. The project has been	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		comprehensively designed to comply with all applicable accessibility mandates, including the Americans with Disabilities Act (ADA), the Fair Housing Act, Chapter 11B of the 2025 California Building Code (CBC), and local objective design standards. Ten of the 92 units are specifically set aside and customized for individuals with developmental disabilities (IDD), featuring specialized mobility and communication enhancements. On-site parking includes designated ADA-accessible parking spaces positioned along an accessible path of travel leading directly to the building's main entrance. Ground-floor entries are designed flush with adjacent sidewalks, incorporating recessed ramps where necessary to maintain a maximum two percent cross-slope across all public entryways. Internal circulation features ADA-compliant elevator service reaching all four floors, widened corridors, accessible common open spaces, and barrier-free paths of travel throughout the central courtyard, lobby, social service offices, and community spaces. Furthermore, public right-of-way improvements include the installation of ADA-compliant sidewalk ramps and upgraded pedestrian crossings at adjacent intersections. Because the project supports multi-modal	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		transit options, provides safe vehicular and emergency access, and fully satisfies all federal, state, and local accessibility standards, impacts related to transportation and accessibility will be less than significant. No adverse impacts were identified. Source Documentation: (1) (45) (51) (57) (53)	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	There are no unique natural features or water resources on or near the site. Source Documentation: (7) (8) (23)	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The site is fully developed and contains no natural vegetation or wildlife, only small areas of landscaping. There is no impact in this regard. Source Documentation: (7) (8) (23)	
Other Factors 1	1	The project will provide much-needed affordable housing, including for Veterans and individuals with developmental disabilities (IDD), near high-quality transit. The proposed project is beneficial to both residents and the community. Source Documentation: (7)	
Other Factors 2			
ENERGY			
Energy Efficiency	2	The project will not result in a wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation, nor will it obstruct regional or state energy efficiency or renewable energy goals. Construction Energy Energy consumed	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		during site preparation and construction will be temporary and typical of standard urban infill redevelopment. Heavy equipment, delivery vehicles, and construction worker transit will utilize standard petroleum fuels, while temporary power hookups will utilize local grid electricity. Construction activities will be subject to local limits on operating hours and best management practice requirements to minimize idling and unnecessary equipment operation. Operational Energy & Efficiency Standards The proposed development has been designed in compliance with the 2025 California Building Code (CBC), 2025 California Energy Code (Title 24, Part 6), and 2025 California Green Building Standards Code (CALGreen, Title 24, Part 11). In accordance with state energy standards, the building design incorporates a designated rooftop solar zone occupying at least 15 percent of the total roof area to accommodate future solar photovoltaic generation. Furthermore, the project provides active Electric Vehicle (EV) charging stations, EV-ready, and EV-capable parking stalls in the rear parking area, supporting the transition to zero-emission transportation. Utility Supply and Grid Capacity Electrical service for the project area is supplied through Silicon Valley Clean Energy (SVCE),	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		which provides 100% carbon-free electricity to the City of Campbell, with grid transmission and infrastructure maintained by Pacific Gas and Electric (PG&E). Because the project is an infill redevelopment within an established urban area, existing utility connections and regional energy production facilities are adequate to serve the estimated residential demand without requiring the construction of new off-site energy generation or distribution infrastructure. Transportation Energy The project is situated in a highly walkable, multi-modal urban corridor at the intersection of West Hamilton Avenue and South Winchester Boulevard. It is located within 1/2 mile of high-frequency Valley Transportation Authority (VTA) bus routes and near the Winchester Light Rail Station, enabling future residents to utilize public transit options. The site design also incorporates 22 long-term secured bicycle parking spaces and 3 short-term spaces to encourage non-motorized micro-mobility. By placing high-density affordable housing near transit, services, and employment centers, the project reduces overall vehicle miles traveled (VMT) and personal transportation energy consumption relative to	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		suburban sprawl development. Conclusion Therefore, the project complies with all applicable federal, state, and local energy standards and will have no adverse impact on local energy supplies or infrastructure. Source Documentation: (1) (45) (51) (52) (53) (54)	

Supporting documentation
PLN-2026-18-Zoning Clearance Approval (2026-04-17).pdf
PLN-2026-18-Approval Letter (2026-04-17).pdf
Educational and Cultural Facilities.docx
geotechnical study.pdf
Hazards and Nuisances including Site Safety and Noise.docx

Additional Studies Performed:
See Source Documentation List

Field Inspection [Optional]: Date and completed by:
Jorge Balde 1/28/2026 12:00:00 AM

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

Source Documentation List.pdf

List of Permits Obtained:
No permits have been obtained yet. The moment the use of Federal funds was contemplated, all project actions were halted to conduct this environmental review.

Public Outreach [24 CFR 58.43]:
The project sponsor held several public community meetings: o 2/20/25 (neighborhood meeting) o 3/31/26 (for individuals with developmental disabilities/IIDD community members) o 4/12/26 (meeting held at the United

Methodist Church around the corner from the project on Winchester Blvd.) The project results in a Finding of No Significant Impact (FONSI) which will be published on HUD's Community Planning and Development (CPD) website, as this review will be converted to a HEROS record. A copy of the FONSI will be circulated to public agencies, interested parties, and landowners/occupants of parcels located within the project's Area of Potential Effects (APE). Information about where the public may find the Environmental Review Record pertinent the project will be included in the FONSI Notice.

Cumulative Impact Analysis [24 CFR 58.32]:

The cumulative impact analysis evaluates whether the incremental environmental effects of the Cleveland Commons project, combined with past, present, and foreseeable future projects in the surrounding area, result in a significant cumulative impact. The geographic scope encompasses the City of Campbell and the immediate urbanized West Hamilton Avenue and South Winchester Boulevard mixed-use corridors. The project involves demolishing a vacant commercial bank building and constructing a four-story, 92-unit affordable multi-family residential development at 60 W. Hamilton Ave. The site is designated Commercial Corridor Mixed-Use (CC-MU) under the Envision Campbell General Plan and Area 3 of the Winchester Boulevard Master Plan, which explicitly envision high-density infill residential redevelopment along key transit corridors. The General Plan EIR comprehensively evaluated cumulative growth projections through 2040, including full buildout of housing overlay sites and mixed-use corridors. Regarding air quality and greenhouse gas emissions, construction will be temporary and subject to BAAQMD standard dust and emission controls. Operationally, the 100% affordable infill project is adjacent to high-frequency VTA bus lines and approximately one mile from the Winchester Light Rail Station, reducing vehicle miles traveled per capita compared to regional averages and ensuring the project's contribution is not cumulatively considerable. For noise and vibration, construction noise will be restricted to authorized daytime hours from 8:00 AM to 5:00 PM, Monday through Friday, under standard best management practices. Operational noise will consist of standard residential activity and shielded rooftop mechanical equipment complying with municipal standards, avoiding significant cumulative noise increments. Concerning transportation and infrastructure, replacing commercial use with multi-family residential results in low peak-hour trip generation well within the planned arterial network capacity. Dedicated emergency access, frontage improvements, and ADA upgrades enhance safety, while the City Engineer and Public Works Department confirmed ample capacity in water, sanitary sewer, storm drain, and solid waste systems. In terms of public services and utilities, the 92 affordable units generate incremental demand for police, fire, medical, school, and park services. Inter-agency review by the Campbell Police Department, Santa Clara County Fire District, local school districts, and West Valley Recycles confirmed infrastructure adequacy, and mandatory municipal park in-lieu fees and statutory

school impact fees fully mitigate cumulative demands. With respect to biological, cultural, and environmental resources, the site is a previously developed infill parcel lacking sensitive habitats, wetlands, or historical structures. Compliance with standard conditions of approval for inadvertent cultural or tribal discoveries, pre-construction bird nesting surveys, and MRP 3.0 / C.3 stormwater quality standards ensures cumulative natural resource impacts remain less than significant. Because Cleveland Commons is fully consistent with the land use intensity, housing targets, and environmental mitigation framework of the certified Envision Campbell General Plan EIR, its incremental impacts are not cumulatively considerable. The project results in a less than significant cumulative impact, and no adverse cumulative impacts were identified.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Charities Housing considered a 5 -story, 104 unit building to serve seniors. Due to funding constraints, Charities needed to pivot to a slightly smaller (less costly) project serving a populations that could support higher rents as well as adding veterans that would receive housing vouchers from the VA and Housing Authority.

No Action Alternative [24 CFR 58.40(e)]

The site could be acquired or developed as affordable housing, market-rate housing or commercial uses. Alternatively, the existing bank building could be rehabilitated and operated as a commercial building once more. The impacts discussed in this Environmental Assessment would not occur.

Summary of Findings and Conclusions:

The project is suitable from an environmental standpoint. As long as the mitigation measures are adhered to, there is no anticipated significant impact from the project. The project is a benefit to the community and will provide affordable housing. The project will provide a safe, sanitary, and affordable place for residents.

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

Summarized below are 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 or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	The result of regulatory oversight was the requirement for a Vapor Intrusion Mitigation System or VIMS. The VIMS will also mitigate radon gas, if present.	N/A	See attached MMRP.	
Noise Abatement and Control	N1. Exterior window and door assemblies would be required to meet minimum sound transmission class (STC) ratings as detailed below. 230, 330: Bedrooms: Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 37. 230, 231, 232, 233, 234, 235, 330, 331, 332, 333, 334, 335, 430, 431, 432, 433, 434: Living Rooms, 430: Central and Western Bedrooms: Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 36. 231, 232, 233, 234, 235, 331, 332, 333, 334, 335, 431, 432, 433, 434, 435: Bedrooms 430: East Bedroom: Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 34. Unit / Location: All other rooms Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 27. N2. Pursuant to HUD and California Building Code (CBC) requirements, mechanical	N/A	See attached MMRP.	

	ventilation is required for all units to provide for a closed-window/door condition in habitable rooms.			
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	G1. All recommendations contained in the Geotechnical Investigation prepared for the project by Rockridge Geotechnical and dated July 10, 2026, or later, shall be followed. SW1. Stormwater Requirements: This application is subject to the new stormwater requirements detailed in the most recent Municipal Regional Permit (MRP 3.0). Specifically, the construction / reconstruction of any impervious improvements within the public right-of-way will now require the associated stormwater runoff to be treated. The construction, operation & maintenance of said treatment in the right-of-way will be the applicant's sole responsibility. The building permit and grading permit will not be issued until all Public Works Conditions of Approval have been satisfied. The following comments are based on revised Civil sheets C5.0 and C5.1 received from HMH on 3/2/26 and revised sheet C3.1 received on 3/3/26. SW2. Grading and Drainage Plan: Prior to issuance of any building permits for the site, the applicant shall conduct hydrology studies based on a ten-year storm frequency, prepare an engineered grading and drainage plan, and pay fees required to obtain necessary grading permits. Prior to occupancy, the design engineer shall provide	N/A	See attached MMRP.	

	written certification that the development has been built per the engineered grading and drainage plans. SW3. State General Construction Activity Permit: Prior to issuance of any grading or building permits, the applicant shall comply with the State General Construction Activity Permit requirements including paying fees, filing a Notice of Intent and providing a Storm Water Pollution Prevention Plan (SWPPP). The applicant shall provide the City with a copy of the filed Notice of Intent and SWPPP. SW4. Stormwater Pollution Prevention Measures: Prior to issuance of any grading or building permits, the applicant shall comply with the National Pollution Discharge Elimination System (NPDES) permit requirements, Santa Clara Valley Water District requirements, and the Campbell Municipal Code regarding stormwater pollution prevention. Specifically, the project must include source control, site design and treatment measures to achieve compliance with Provision C.3. of the NPDES Permit. Measures may include, but are not limited to, minimization of impervious surface area, vegetated swales, infiltration areas, and treatment devices. The primary objectives are to improve the quality and reduce the quantity of stormwater runoff to the bay. Prior to issuance of any building permits: a. The applicant's designer or engineer shall submit the required certification			

	indicating that sizing, selection, and design of treatment BMP's for the project site has been completed to meet the requirements of the City of Campbell's NPDES permit. b. The applicant shall sign the ''Covenants for the Operation and Maintenance of Stormwater Facilities'' and submit a Stormwater Management Plan. Prior to occupancy: a. A qualified BMP certifier is required to inspect the stormwater management facilities, submit a complete set of as-built drawings to Public Works Engineering, and certify on these drawings that: 1. The stormwater management facilities were constructed in compliance with the approved plans. 2. The as-built drawings show all pertinent constructed dimensions, elevations, shapes, and materials. 3. All variations in construction from the approved design plan have been identified, including omissions to and additions from the approved plan. 4. Any changes are in conformance with local, state, or federal regulations. SW5. Maintenance of Stormwater Facilities: Owner(s), current and future, are required to maintain the landscaped bio-treatment areas in the public right of way. Execution of a Maintenance Agreement will be required prior to Building Permit Final.			
Hazards and Nuisances including Site Safety and Site-	G1. All recommendations contained in the Geotechnical Investigation prepared for the project by Rockridge Geotechnical and dated July 10, 2026, or later, shall be followed.	N/A	See attached MMRP.	

Generated Noise				
Air Quality	AQ1. Implement control measures for construction and demolition-related air emissions to ensure that each project sponsor and contractor reduces particulate, ROG and NOx emissions by complying with the BAAQMD policies and guidelines. The project sponsor and contractor shall implement the following control measures: * Provide transit information kiosks. * Cover all trucks hauling construction and demolition debris from the site. * Water on a continuous as-needed basis all earth surfaces dur- ing clearing, grading, earthmoving and other site preparation activities. * Use watering to control dust generation during demolition of structures or break-up of pavement. * Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved parking areas and staging areas. * Sweep daily (with water sweepers) all paved areas and staging areas. * Provide daily cleanup of mud and dirt carried onto paved streets from the site. * Renovation, demolition activities, removal or disturbances of any material that contain asbestos, lead paint or other hazardous pollutants will be conducted in accordance with BAAQMD rules and regulations. * Properly maintain all construction equipment. * Reduce equipment idling time. * For construction near sensitive receptors: o Install wheel washers for all exiting trucks, or	N/A	See attached MMRP.	

	wash off the tires or tracks of trucks and equipment leaving the site. o Suspend dust-producing activities during periods when instantaneous gusts exceed 25 mph when dust control measures are unable to avoid visible plumes. o Limit the area subject to excavation, grading and other construction or demolition activity at any one time. AQ2. Developers shall implement emissions control measures, where applicable, to development activities within the General Plan Area in order to reduce overall emissions from traffic and area sources. The emissions control measures could include the following: * Where practical, future development proposals shall include physical improvements, such as sidewalk improvements, landscaping and the installation of bus shelters and bicycle parking, that would act as incentives for pedestrian, bicycle and transit modes of travel. * New or modified roadways should include bicycle lanes where reasonable and feasible. * Provide transit information kiosks. * Where practical, employment-intensive development proposals (i.e. office and retail) shall include measures to encourage use of public transit, ridesharing, van pooling, use of bicycles and walking, as well as to minimize single passenger motor vehicle use. * Offices or retail uses that have 50 or more employees and provide parking should implement a parking cash-out			

	program (where non-driving employees receive transportation allowance equivalent to the value of subsidized parking). * Develop parking enforcement and fee strategies that encourage alternative modes of transportation. * Parking lots or facilities should provide preferential parking for electric or alternatively fueled vehicles. * Require energy efficient building designs that exceed State Title 24 building code requirements. * Discourage use of gasoline-powered landscape equipment. * Implement and enforce truck idling restrictions of three minutes. * Only allow low-emitting fireplaces for residential uses, such as those that only burn natural gas.			
Contamination & Toxic Substances	CT2. An Operations and Maintenance Plan (O&M Plan) that details protocols for regular inspection and maintenance of the VIMS System is required. CT3. Applicant shall follow the Site Management Plan prepared by PSI and dated July 2, 2026 or later, as approved by Santa Clara County Department of Environmental Health, at all times during construction. CT4. In order to comply with BAAQMD and Cal- OSHA requirements, all asbestos material inside the structure must be professionally removed from the property prior to any renovation or demolition activity (approx. 300 square feet.)	N/A	See attached MMRP.	
Endangered Species	ES1. If project construction is to occur between February 1st and August 31st a qualified biologist	N/A	See attached MMRP.	

	should conduct pre-construction surveys of all potential nesting habitats within 300 feet of project activities. If nesting birds are identified within the survey area, a non- disturbance buffer should be established around the nest tree during the breeding season or until the young have fledged. If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied, no further mitigation measures are required. Raptor or other bird nests initiated during construction are presumed to be unaffected and no buffer is necessary. ES2. No person shall alter, remove or relocate, a tree without a permit.			
Historic Preservation Act	HP1. Applicant shall follow the Archaeological and Tribal Monitoring Plan (ATMP) prepared by Evans & De Shazo and dated July 22, 2026 or later.	N/A	See attached MMRP.	

Project Mitigation Plan

See attached MMRP.

Lead Agency Agreeement.pdf
CalHFA Addendum.pdf
110226 Cleveland Commons MMRP.xlsx

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ **No**

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. There is one major airport and one military airfield within 15 miles of the project site. There are no minor airports within 15 miles. San Jose International Airport is located 4.89 to the north. Moffett Field military airfield is located 9.93 miles north-northwest of the site. The project site does not lie within any airport clear zone or accident potential zone. Source Documentation: (7) (8) (9) (10)

Supporting documentation

Airports.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. 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). Areas so designated 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 U.S. Virgin Islands, and the Great Lakes, and consist of 857 units. There are no Coastal Barrier Resources in California. Source Documentation: (11)

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

FIRM.pdf

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

✓ No

Based on the response, the review is in compliance with this section.

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The project involves the development of real property. The project is not located within a FEMA identified Special Flood Hazard Area. The project site is located in Zone X: Areas of Minimal Flooding. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in Zone X. The subject property flood hazard designation is depicted on FIRM Map Number 06085C0237H, effective May 18, 2009. Flood insurance is not required. There is no impact to floodplains as a result of the proposal. Source Documentation: (12)

Supporting documentation

FIRM(1).pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

✓ Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

✓ Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

✓ Ozone

Particulate Matter, <2.5 microns

Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Ozone 100.00 ppb (parts per million)

Provide your source used to determine levels here:
US EPA Greenbook; values are in Tons per Year and aggregate ROG and NOx values from construction as computed by CalEEMod (see attached calculations).

4. **Determine the estimated emissions levels of your project. Will your project exceed any of the de minimis or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Ozone 1.50 ppb (parts per million)

Based on the response, the review is in compliance with this section.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. See attached analysis. Construction emissions resulting from the implementation of the proposed project are below the thresholds of significance for construction. No

adverse effects on air quality would occur due to construction of the proposed project. The operational emissions associated with the proposed project are below the General Conformity de minimis level and below the BAAQMD thresholds, therefore, no adverse effects on air quality would occur due to operation of the proposed project. No adverse effects on air quality would occur due to operation of the proposed project. The proposed project is consistent with the state and local reduction goals for transportation, energy, and other emissions associated with land use and development. In short, the project was shown it would not exceed 1,100 MT CO2E and would not represent a substantial source of GHG emissions. Therefore, the proposed project would not conflict with or block the implementation of a plan intended to reduce GHG emissions. There are no significant TAC sources within a 1,000-foot Sphere of Influence. There is no impact in this regard. Excess cancer risks or further refinement were not identified in this screening-level analysis. Conclusion Current BAAQMD Best Management Practices to control particulate matter and diesel exhaust during construction are required. Implementation of mitigation reduces impacts from PM2.5 and PM10 (diesel particulate matter and dust) to less than significant. Mitigations Required: AQ1 & AQ2 Source Documentation: (7) (8) (13) (14) (15)

Supporting documentation

stationary sources.pdf
planning healthy places.png
mobile source map.png
construct tons per year.png
construct lbs per day.png
operational lbs per day.png
operational tons per year.png
equity.png
Cleveland Commons Summary Report (1).pdf
Cleveland Commons Detailed Report (1).pdf
Clean Air.docx

Are formal compliance steps or mitigation required?

✓ Yes

No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

✓ No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The City of Campbell is located in Santa Clara County. The project site is not located in the California Coastal Zone. The site is about 10 miles from the San Francisco Bay shoreline, which is under the jurisdiction of the San Francisco Bay Conservation and Development Commission. However, the site is not required by the BCDC to obtain a permit either, due to distance. A Coastal Development Permit is not required. Source Documentation: (7) (8) (16) (17)

Supporting documentation

06CZB_SanFrancisco.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.
For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.
** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice CPD-23-103?

Yes

Explain:

✓ No

* Notes:
- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

✓ Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

8. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated. Project cannot proceed at this location.

✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice CPD-23-103 for additional information on radon mitigation plans.
** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls.**

The result of regulatory oversight was the requirement for a Vapor Intrusion Mitigation System or VIMS. The VIMS will also mitigate radon gas, if present.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.
** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. See attached analysis. Conclusion The site has a Vapor Encroachment Condition (VEC) from off-site sources that requires a Vapor Intrusion Mitigation System (VIMS). Due to soil conditions, a Health and Safety Plan (HSP) for worker safety during construction is required, as well as a Site Management Plan (SMP). The SMP has been conditionally accepted by the regulatory oversight agency. A draft VIMS design and Operations & Maintenance Plan (O&M Plan) have been submitted to the oversight agency and is currently under review. The subject property contains a commercial building constructed in ca. 1966 to be demolished. Testing confirmed the absence of lead-based paint and the presence of some asbestos. Although the area is not large enough to require compliance authorization under the National Emission Standards for

Hazardous Air Pollutants (NESHAP), as enforced by the Bay Area Air Quality Management District, mitigations is required for property handling and disposal of asbestos during demolition. If present, radon gas would be blocked from entering the building by the required VIMS system; therefore post-construction testing appears unwarranted. Mitigations Required: CT1, CT2, CT3 and CT4. Source Documentation: (18) (19) (20) (21) (22)

Supporting documentation

VIMS O and M Plan.pdf
VIMS design.pdf
SMP.pdf
smp acceptance letter.pdf
Contamination and Toxic Substances.docx
Phase I ESA small.pdf
LBP and ACBM.pdf
case letter.pdf

Are formal compliance steps or mitigation required?

- ✓ Yes
- No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq*.); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect specifies or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. Are federally listed species or designated critical habitats present in the action area?

✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

Screen Summary

Compliance Determination

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act. The U.S. Fish and Wildlife Service was contacted on July 6, 2026, for a list of number of endangered and threatened species that may occur in the project location or be affected by the proposal. These species are listed below. Species of Concern Birds: * California Condor (Gymnogyps californianus * California Least Tern (Sternula antillarum browni) * California Ridgway's Rail (Rallus obsoletus obsoletus) Reptiles: * Northwestern Pond Turtle (Actinemys marmorata) Amphibians: * California Red-legged Frog (Rana draytonii) * California Tiger Salamander (Ambystoma californiense) * Foothill Yellow-legged Frog (Rana boylii) Insects: * Monarch Butterfly (Danaus Plexippus) (Proposed) Project Impacts The project site is currently covered in imperious surfaces (building, driveway, paved parking lot), except for small, landscaped areas. The site does not contain any suitable habitat for special-status plants and animals. There is no riparian habitat on or near the property. Arborist Report A Preliminary Arborist Report was prepared for the project by HortScience in 2024. Excerpts follow. Thirty-one (31) trees representing 14 species were assessed by HortScience. Six off-site trees, including two street trees, were included in the assessment. Overall, twenty (20) trees were in fair condition, seven were poor, and four trees were in good condition. In general species present are commonly observed in the region. None were native to California. All trees appeared to have been planted as part of the existing landscape treatment. Protected Trees in Campbell The City of Campbell defines a Protected Tree on properties other than single-family residential as any tree with a diameter of 12 inches or greater, measured at four feet above grade. Nineteen (19) trees met this criterion. Permits and replacement planting are required for Protected trees. Suitability for Preservation Trees that are preserved on sites where development or other improvements are planned must be carefully selected to make sure that they may survive construction impacts, adapt to a new environment and perform well in the landscape. The goal is to identify trees that have the potential for long-term health, structural stability and longevity. Preliminary Tree Preservation Guidelines All on-site trees will be removed. Trees located off-site but close to the project boundary will be retained. The HortScience report provided design recommendations and pre-demolition and pre-construction treatments and recommendations that should be followed. Finding There is No Impact or No Effect to listed species as a result of the project. However, there are numerous mature trees around the site that could harbor nesting birds. Mitigations Required: ES1 & ES2. Source Documentation: (7) (8) (23) (24)

Supporting documentation

Species List_ Sacramento Fish And Wildlife Office.pdf
60-W-Hamilton-Ave-Campbell_HBC-Prelim-Arb-Rpt_Feb-2024.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

✓ No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

✓ Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- **Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR**
- **Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.**

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

✓ Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

✓ Yes

Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. See attached analysis. Conclusion There are no current or planned above-ground storage tanks (ASTs) within a mile that could pose an explosive or flammable hazard to the project or future residents. Source Documentation: (7) (8) (25) (26) (27) (28)

Supporting documentation

Explosive and Flammable Hazards.docx
planned ASTs.png
Acceptable separation distance calculator tool.pdf
8398612_2.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

✓ Yes

No

2. Does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

Yes

✓ No

3. Does "important farmland," including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

- Utilize USDA Natural Resources Conservation Service's (NRCS) Web Soil Survey http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm
- Check with your city or county's planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center http://offices.sc.egov.usda.gov/locator/app?agency=nrcs or your NRCS state soil scientist https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/contact/states/ for assistance

✓ No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes

Screen Summary

Compliance Determination

The project includes activities that could convert agricultural land to a non-agricultural use, but "prime farmland","unique farmland", or "farmland of statewide or local importance" regulated under the Farmland Protection Policy Act does not occur on the project site. The project is in compliance with the Farmland Protection Policy Act. Prime farmland is land best suited for producing food, forage, fiber, and oilseed crops and also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land but not urban built-up land or water). The Web Soil Survey produced by the United States Department of Agriculture shows that 100% of the site is underlain by Urban land-Stevescreek complex, 0 to 2 percent slopes. The project will not affect farmlands. No federally designated Farmlands have been identified within the project site. Source Documentation: (7) (29) (30)

Supporting documentation

20260707_18055806536_23_Soil_Report.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:
(1) The property is cleared of all existing buildings and walled structures; and
(2) The property is cleared of related improvements except those which:
(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);
(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and
(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

✓ No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

✓ No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information[1] to determine flood elevation. Include documentation and an explanation of why this is the best available information[2] for the site. Note that newly constructed and substantially improved[3] structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool , data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

✓ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

[1] Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

[2] If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your local environmental officer with additional compliance questions.

[3] Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at 24 CFR 55.2(b)(12).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. The project involves the development of real property. The project is not located within a FEMA identified Special Flood Hazard Area. The project site is located in Zone X: Areas of Minimal Flooding. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in Zone X. The subject property flood hazard designation is depicted on FIRM Map Number 06085C0237H, effective May 18, 2009. Flood insurance is not required. There is no impact to floodplains as a result of the proposal. Source Documentation: (12)

Supporting documentation

FIRM(2).pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

	No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
	No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].
	No, because the project consists solely of activities covered by the ACHP's PROGRAM COMMENT ON CERTAIN HOUSING, BUILDING AND TRANSPORTATION UNDERTAKINGS, as demonstrated in the ACHP PC Checklist.
✓	Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

✓ State Historic Preservation Offer (SHPO) Response Period Elapsed

✓ Advisory Council on Historic Preservation Not Required

✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Tamien Nation	Completed
✓ Indian Canyon Mutsun Band of Costanoan	Completed
✓ Muwekma Ohlone Tribe of the San Francisco Bay Area	Completed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

A list of tribes was obtained from HUD via the Tribal Directory Assessment Tool on March 12, 2026. The Native American Heritage Commission was contacted, and a search of the Sacred Lands File returned negative results on March 26, 2026. All identified tribes (20 contacts in total) were mailed a letter on May 7, 2026, with a follow-up email sent on June 8, 2026. The County of Santa Clara consulted with three tribes on the Project, including the Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Tribe of the San Francisco Bay Area, and Tamien Nation. The result of consultation was the development of an Archaeological and Tribal Monitoring Plan (ATMP), whereby the Muwekma Ohlone Tribe of the San Francisco Bay Area will provide monitoring during ground disturbing activities. The Tamien Nation requested that the Tribe be updated in the event of discovery of Tribal Cultural Resources. Indian Canyon Mutsun Band of Costanoan stated that the Project Area is closer to the indigenous territory of Tamien Nation and requested to be informed of any recommendations provided by Tamien Nation during tribal consultation, which was done.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes
No

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**
   The Agency Official, County of Santa Clara, defined the Area of Potential Effects (APE) as the 1.2-acre subject property consisting of a ca. 1966 commercial building, landscape, and parking lot for direct effects and seven surrounding and facing properties for a total of eight parcels. The vertical extent of the APE proposes construction of just over 52 feet (52'2'') and excavation to a depth of up to five (5) feet.

   In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

   Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information

   Additional Notes:

   See attached studies. All of the addresses above are located in the City of Campbell, California.

2. **Was a survey of historic buildings and/or archeological sites done as part of the project?**

   ✓ Yes

   Document and upload surveys and report(s) below.
   For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

   Additional Notes:

   No

Step 3 –Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the

Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Document reason for finding:

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. See attached analysis. The County of Santa Clara, as Agency Official, found the project, as proposed, will have no effect on historic properties as none were identified within the Area of Potential Effects. The Archaeological and Tribal Monitoring Plan developed in consultation with tribes, will a requirement of approval of the Part 58 review. Consultation Consultation with the State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act was initiated by the County of Santa Clara with a letter and package of information on July 30, 2026. On August 31, 2026, 30 days elapsed and the SHPO did not object to the determination no historic properties affected by the Undertaking. Per 36 CFR s. 800.3(c)(4), this concludes Section 106. Mitigation Required: HP1 Source Documentation: (31) (32) (33) (34) (35) (36) (37) (38) (39)

Supporting documentation

email3.pdf

email2.pdf
email1.pdf
Cleveland Commons_Attachment C.pdf
Cleveland Commons_Attachment B.pdf
Cleveland Commons SHPO Coverletter_Attachment A.pdf
Historic Preservation.docx

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

✓ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

4**. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).**

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Is your project in a largely undeveloped area?

✓ No

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Document and upload noise analysis, including noise level and data used to complete the analysis below.

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

✓ Mitigation as follows will be implemented:

N1. Exterior window and door assemblies would be required to meet minimum sound transmission class (STC) ratings as detailed below. 230, 330: Bedrooms: Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 37. 230, 231, 232, 233, 234, 235, 330, 331, 332, 333, 334, 335, 430, 431, 432, 433, 434: Living Rooms, 430: Central and Western Bedrooms: Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 36. 231, 232, 233, 234, 235, 331, 332, 333, 334, 335, 431, 432, 433, 434, 435: Bedrooms 430: East Bedroom: Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 34. Unit / Location: All other rooms Required Acoustical Treatments: Window and exterior door assemblies must meet or exceed a minimum STC of 27. N2. Pursuant to HUD and California Building Code (CBC) requirements, mechanical ventilation is required for all units to provide for a closed-window/door condition in habitable rooms.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was normally unacceptable: 71.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. See attached analysis. The subject property is subjected to a Future Noise Environment of up to 71 dBA DNL, which is considered ''Normally Unacceptable'' for residential development by HUD standards. Mitigations are required to bring interior noise levels below 45 dBA DNL, including sound-rated window and wall components and mechanical ventilation. Common outdoor space is exposed to a Future Noise Environment of up to 60 dBA DNL. This is considered ''Acceptable'' for common outdoor space by HUD. No mitigation is needed for outdoor space. Mitigations Required: N1 & N2. Source Documentation: (40)

Supporting documentation

Noise Study.pdf
Noise Abatement and Control.docx

Are formal compliance steps or mitigation required?

- ✓ Yes
- No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. The project activities do not affect a sole source aquifer, as there are no aquifers subject to a MOU between EPA and HUD in Santa Clara County. The nearest Sole Source Aquifer (SSA) is the Santa Margarita

Aquifer, Scotts Valley SSA, over 12 miles to the south of the project area. There are no impacts to Sole Source Aquifers. Source Documentation: (41)

Supporting documentation

SSA map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 requires avoiding to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands, and avoiding actions that directly or indirectly support new construction in wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory must be used as a primary screening tool, but observed or known wetlands not delineated on NWI maps must also be evaluated.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in 24 CFR 55.10 and referenced in Executive Order 11990? The term "new construction" shall include grading, clearing, draining, dredging, channelizing, filling, diking, impounding, and related activities for any structure or facilities, including the siting of new manufactured housing units.

No

✓ Yes

2. Will the new construction activities directly impact an onsite wetland?

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, prairie potholes, wet meadows, river overflows, mud flats, and natural ponds. This definition includes those wetland areas separated from their natural supply of water as a result of activities such as the construction of structural flood protection methods or solid fill roadbeds and activities such as mineral extraction and navigation improvements. This definition includes both wetlands subject to and those not subject to Section 404 of the Clean Water Act as well as constructed wetlands.

✓ No, an onsite wetland will not be directly impacted by new construction activities, as defined in 24 CFR 55.10.

Yes, there is an onsite wetland that will be directly impacted by new construction activities, as defined 24 CFR 55.10.

3. Will the proposed project indirectly affect wetlands by modifying the flow of stormwater, releasing pollutants, or otherwise changing conditions that contribute to wetlands viability?

Yes, wetlands may be indirectly affected by changing conditions that contribute to wetlands viability.

✓ No, wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

4. Will the proposed project indirectly affect off-site wetlands?

Yes, off-site wetlands may be indirectly affected.

✓ No, off-site wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

Screen Summary

Compliance Determination

The project will not impact wetlands. The project is in compliance with Executive Order 11990. The site is fully developed; there are no wetlands on or near the site. There are no riparian habitats on or near the site. There are no impacts to wetlands anticipated as a result of the project. The nearest wetland is Las Gatos Creek, 0.84 miles to the southeast. Urban development separates the site from the nearest wetland. There are no impacts to wetlands anticipated as a result of the project. Source Documentation: (42)

Supporting documentation

NWI.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act 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) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.
Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. No wild and scenic rivers are located within Santa Clara County. The nearest designated Wild and Scenic River to the Cleveland Commons project site in Campbell, California is the Big Sur River. Big Sur River (Monterey County) is located approximately 70 to 75 miles southwest of the project site in a straight line (or roughly 90 to 100 driving miles). Source Documentation: (43)

Supporting documentation

Rivers.png

Are formal compliance steps or mitigation required?

Yes

✓ No