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

Project Information

Project Name: Alemany Apartments RAD Conversion

Responsible Entity: Mayor's Office of Housing and Community Development, City and County of San Francisco

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

State/Local Identifier: DUNS 070384255

Preparer: Eugene T. Flannery

Certifying Officer Name and Title: Katha Hartley, Deputy Director, Mayor's Office of Housing and Community Development

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

Consultant (if applicable): Environmental Science Associates

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Project Location

The project site includes the following properties:

- 500-610 Alemany Boulevard (even), San Francisco, CA 94110; Assessor's Parcel Number (APN) 5843-008
- 845-999 Ellsworth Street (odd), San Francisco, CA 94110; APN 5843-007
- 900-1000 Ellsworth Street (even), San Francisco, CA 94110; APN 5843-007

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

The San Francisco Housing Authority (SFHA) seeks to convert public housing at Alemany Apartments to funding under the federal Rental Assistance Demonstration (RAD) Program under the United States Housing Act of 1937, as amended and/ or The Consolidated and Further Continuing Appropriations Act of 2012, Public Law 112-55. Conversion to RAD will create financially sustainable real estate assets with a minimum of 20-year useful life, improve resident experience, and ensure the sustainability of the City's public housing infrastructure. Under RAD, the SFHA will transfer ownership and management of the building for rehabilitation by an affordable housing developer, in order to leverage additional private resources as allowed under RAD, and will convert public housing's Annual Contributions Contract (ACC) public housing assistance to RAD project-based Section 8 vouchers (PBVs) for the existing ACC-assisted units. The development will receive increased rent subsidies while continuing to be 100 percent affordable for low-income households. A partnership will be created comprised of a non-profit housing corporation, and a Limited partner Tax Credit Investor to leverage additional funds for rehabilitation of the property. The Authority will ground lease the property to the partnership. The financing for the property will be a combination of tax-exempt bonds and tax credit equity. The tax credit equity does not have to be paid back provided the property continues to serve low income households. The Low Income Housing Tax Credit Program requirements remain in place for 55 years.

Upon transfer of title, the property will be continued to be used for the provision of housing for income eligible residents. Overall the number of units will decrease from 158 to 150. Repairs to the various elements and systems listed below will be made and deferred maintenance items will be addressed. The scope of rehabilitation activities will include the following:

General - Site

- Demolish two residential buildings (Buildings 9 & 13)
- Build new residential building (3,200 sf) with four accessible flats in the general location of the existing building
- Build new community building (4,800 sf) for new community room, offices, and relocated police substation
- New paving and landscape throughout the site
- 4-5 new accessible ramps
- Install 8' fence along Alemany Boulevard
- New garbage/ recycling/ compost bin storage locations on site
- Provide additional accessible parking spaces, 2 perpendicular, 6 parallel
- Remove existing playground equipment
- Install one new playground, refurbish basketball court, and provide other site amenities
- Provide storage in backyard and yard fencing at front and back of each residential unit
- Provide security cameras and additional exterior lighting

Residential Buildings - Exterior

- Replace all roofing
- Replace all windows
- Replace all doors, frames, and hardware
- Repair stucco and wood siding where needed
- Structural retrofits to 3-story buildings
- Provide insulation at exterior walls
- Remove and replace exterior stairs, railings, and decks at 3-story buildings
- Paint all exterior surfaces
- Provide window security system
- Provide entry overhangs over unit doors at 3-story buildings
- Re-roof entry overhangs at 2-story buildings
- New electric meters per unit
- Enlarge stoops at front and back door of each unit
- Isolate plumbing shut-off for future maintenance R

Residential Buildings - Interior

- Remove vinyl tile flooring, replace with vinyl sheet flooring
- Refinish hardwood floors
- Remove and replace all water heaters
- Remove and replace HVAC system at each unit
- Provide accessibility upgrades to 7 units
- Provide new tub, tub surround, faucet, showerhead, mixing valves, and lavatory
- Provide new casework, countertop, appliances, fixtures and fittings at kitchen
- Paint all surfaces
- Provide new washer hook ups and direct venting for dryers in all units.
- Provide gas outlet at dryer location at all units
- Provide bathroom exhaust at all units
- Provide pest proofing
- Replace all interior doors, frames, and hardware
- Upgrade to LED lighting

Administrative/Public Space

- Reconfigure laundry room to accommodate 15 washers and 15 dryers
- Paint walls and provide new flooring at laundry room
- Convert existing community room into maintenance shop
- Paint walls and provide new flooring at offices and bathroom adjacent to new maintenance shop
- Convert existing office within Building 2 back into a unit

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

RAD Conversion of Alemany Apartments will help to preserve affordable housing for low income persons in San Francisco by transforming the public housing property into a financially sustainable real estate asset. It will improve resident experience by injecting a stream of capital for past due repairs, accessibility improvements and replacement of building components whose useful life has expired. It would allow for significant capital repair needs for which there would not otherwise be funding. Without the RAD conversion the living conditions for tenants would continue to worsen at Alemany Apartments. The RAD conversion will provide funding for significant upgrades at the site, without which the safety and well-being of the tenants are seriously compromised.

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

The project site is located at the south end of the Bernal Heights neighborhood of San Francisco, San Francisco County, California. The project site is an 8-acre property located north of Alemany Boulevard and Interstate 280, with Ellsworth Street bisecting the project site from southwest to northeast. The subject properties are comprised of the following addresses: 500– 610 Alemany Boulevard (even street numbers), 845–999 Ellsworth Street (odd street numbers), and 900–1000 Ellsworth Street (even street numbers). The project site is developed with 23 primarily two-story apartment buildings (with some three-story buildings), a small community center and a Headstart (pre-school) building. The landscaping consists mostly of lawn with some shrubs located adjacent to the buildings. There are several playgrounds, one basketball court, and one greenhouse. Land uses in the vicinity of the project site include residences, a community garden, and Saint Mary's Recreation Center and Park.

Funding Information

Grant Number	HUD Program	Funding Amount	
	RAD	\$0.00	

Estimated Total HUD Funded Amount: No HUD Funding

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

Construction Costs:	\$53,948,503
Non-Construction Costs:	\$93,135,813
Total	\$147,084,316

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

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

Compliance Factors: Statutes,	Are formal	Compliance determinations				
Executive Orders, and	compliance					
Regulations listed at 24 CFR	steps or					
§58.5 and §58.6	mitigation					
	required?					
	•					
STATUTES, EXECUTIVE ORD	ERS, AND REGI	ULATIONS LISTED AT 24 CFR 50.4 and 58.6				
Airport Hazards	Yes No	The project site is not within an Airport Clear				
24 CFR Part 51 Subpart D		Zone or Accident Potential Zone or within an				
24 CFK Fait 51 Subpart D		Airport Potential Zone. No military airfields are				
1		in San Francisco County or the nearby vicinity.				
2		Source Document(s): 1				
Coastal Barrier Resources	Yes No	The project site is not within a Coastal Barrier				
		Resource System (CBRS) Unit, or CBRS buffer				
Coastal Barrier Resources Act, as		zone, as defined under the Coastal Barrier				
amended by the Coastal Barrier		Resources Act of 1982 (PL 97-348), as amended				
Improvement Act of 1990 [16		by the Coastal Barrier Improvement Act of 1990				
USC 3501]		(PL 101-591).				
		Source Document(s): 2				
Flood Insurance	Yes No	The project involves the acquisition and				
Flood Disaster Protection Act of		rehabilitation of buildings. The project site is				
1973 and National Flood		not located in a FEMA designated Special Flood				
Insurance Reform Act of 1994		Hazard Area. FEMA has not completed a study				
		to determine flood hazard for the project site;				
[42 USC 4001-4128 and 42 USC		therefore, a flood map has not been published at				
5154a]		this time. The project is neither within a known				
		FEMA floodplain nor within the preliminary				
		Flood Insurance Rate Map prepared for the City				
		and County of San Francisco on September 21,				
		2007. The project would not involve either direct				
		or indirect support of development in a				
		floodplain.				
		Source Document(s): 3, 4				
OTATUTES EVECUTIVE ODD	Statutes, executive orders, and regulations listed at 24 CFR 50.4 & 58.5					
		en an anna an				
Clean Air	Yes No	The project would not increase the number of				
Clean Air Act, as amended,		existing dwelling units and the community				
particularly section 176(c) & (d);		center would serve existing residents, thus an				
	1	operational increase in emissions from motor				

40 CFR Parts 6, 51, 93		vehicles would not be anticipated.
		Criteria Pollutants
		Because the project would not generate new vehicle trips, emissions associated with the proposed action would primarily be the result of construction activities. Consequently, the CalEEMod model (version 2013.2.2) was used to estimate construction-related emissions resulting from the proposed action to determine if the proposed project would exceed federal de minimus or local Bay Area Air Quality Management District (BAAQMD) construction thresholds. Model results indicate that maximum annual emissions from construction would be less than 1.0 ton per year of ozone precursors (reactive organic gases (ROG) and nitrogen oxides (NOx)), carbon monoxide (CO), and particulate matter PM10 and PM2.5), respectively. These emissions would be below the federal de minimis thresholds of 100 tons per year applicable within the San Francisco Bay area Air Basin pursuant to the 1990 amendments to the federal Clean Air Act. Average daily construction-related emissions would be 2.09 pounds per day of ROG, 12.38 pounds per day of NOx, and 0.81 pounds per day of PM10 and PM2.5. These average daily construction-related emissions would be below the respective BAAQMD significance thresholds of 54 pounds per day for ROG, NOx and PM2.5 and 82 pounds per day for PM10. Consequently, criteria pollutant emissions of the proposed project would not be significant with respect to both federal and local air quality standards.
		Fugitive Dust
	8	The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust to ensure that construction projects do not result in visible dust. The Best Management Practices (BMPs) employed in compliance with the City's Construction Dust Control Ordinance would be effective in controlling construction- related fugitive dust.
		Source Document(s): 33, 34, Attachment 1
Coastal Zone Management	Yes No	The San Francisco Bay Conservation and
Coastal Zone Management Act,	\Box	Development Commission (BCDC) is the federally designated State coastal management

		Paint
		Alemany Apartments were constructed before the 1978 federal bans on friable asbestos- containing building materials and lead- containing paints became effective. Therefore, project activities could result in a release of these materials.
	a R	Removal of asbestos materials would comply with the National Emissions Standards for Hazardous Air Pollutants and the Bay Area Air Quality Management District Regulation 11, Rule 2.
		The project has the potential to disturb lead based paint. Construction activities that disturb materials or paints containing any amount of lead are subject to certain requirements of the Cal/OSHA lead standard contained in Title 8, CCR Section 1532.1. Deteriorated paint is defined to be Title 17, CCR, Division 1, Chapter 8, Section 35022 as a presumed lead-based paint that is cracking, chalking, chipping, peeling, non-intact, failed, or otherwise separating from a component. Demolition of a deteriorated lead containing paint component would require waste characterization and appropriate disposal.
		Lead-based paint remediation and stabilization associated with the proposed project will comply with the HUD Lead Safe Housing Rule 24 CFR Part 35, Subpart R — Methods and Standards for Lead-Paint Hazard Evaluation and Hazard Reduction Activities. Subpart R provides standards and methods for evaluation and hazard reduction activities required in subparts B, C, D, and F through M of 24 CFR Part 35.
	đ	Chapter 34 of the San Francisco Building Code (SFBC), Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures, requires specific notification and work standards and identifies prohibited work methods and penalties.
		Source Document(s): 9
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No	The project activity includes previously developed urban properties and thus would have no effect on any natural habitats or federally protected species. The project site is entirely developed and therefore does not support these species' habitat requirements.

		Source Document(s): 10, 11, 32
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No	The project does not involve explosive or flammable materials or operations. There is no visual evidence or indication of unobstructed or unshielded above ground storage tanks (fuel oil, gasoline, propane, etc.) or operations utilizing explosive/flammable material at or in close proximity to the property.
		The project will not result in an increased number of people being exposed to hazardous operations by increasing residential densities, converting the type of use of a building to habitation, or making a vacant building habitable.
		Source Document(s): 9
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part	Yes No	The project site consists of urban land; therefore the project would not affect farmlands. There are no protected farmlands in the City and County of San Francisco.
658		Source Document(s): 12
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No	The project is not located within a 100-year floodplain or 500-year floodplain identified on a known FEMA floodplain or within the preliminary Flood Insurance Rate Map prepared for the City dated July 2008. Source Document(s): 3, 4
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No	 The buildings on the project site, which were initially constructed in approximately 1955, are more than 50 years old. As such it is subject to the Programmatic Agreement By And Among The City And County Of San Francisco, The California State Historic Preservation Officer, And The Advisory Council On Historic Preservation Regarding Historic Properties Affected By Use Of Revenue From The Department Of Housing And Urban Development Part 58 Programs (PA). On May 18, 2015, the San Francisco Planning Department determined that the buildings on the site were not eligible for listing on the National Register of Historic Places. According to the Northwest Information Center, the project site does not contain recorded archaeological resources and the State Office of Historic Preservation Historic Property Directory lists no recorded buildings or structures within or

			adjacent to the project site. There is a low potential for the project to impact unrecorded Native American archaeological resources of unrecorded historic-period archaeological resources within the project area.
	= =		Source Document(s): 29, 30, Attachment 2
Noise Abatement and Control	Yes	No	HUD Noise Standards
Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B			Onsite noise measurements were carried our from April 13-15, 2015. The measurement found exterior noise levels on the site to be up to a Day-Night Average Sound Level (DNL) of 85 dB. HUD regulations at 24 CFR Part 51 Subpart B consider the range between 65 and 75 DNL to be normally unacceptable and above 75 DNL to be unacceptable. For major or substantia rehabilitation projects in the normally unacceptable and unacceptable noise zones HUD actively shall seek to have project sponsor incorporate noise attenuation features, given the extent and nature of the rehabilitation bein undertaken and the level or exterior noise exposure. The project includes replacement of windows with dual-pane windows, replacemer of entry doors with insulated doors and new blow-in insulation for exterior walls throughou Alemany Apartments. One residential buildin will be replaced with new construction wit dual-pane windows, insulated entry doors an insulated exterior walls. Overall, these nois attenuation features would result in improve interior noise conditions for existing residents.
			Construction Noise Construction activities of the proposed project shall comply with San Francisco Nois Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment other than impact tools, not exceed 80 dBA at distance of 100 feet from the source. Impact tools, such as jackhammers and impact wrenches, must have both intake and exhau- muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 pr and 7:00 am, if noise would exceed the ambient noise level by 5 dBA at the project property lin unless a special permit is authorized by th Director of Public Works. Construction

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		compliance with the San Francisco Noise Ordinance is not anticipated to affect indoor uses associated with the nearest sensitive receptors (residences) north of the project site. <u>Operational Noise</u>
		The rehabilitated and replaced residential structures and new community center are not anticipated to introduce new permanent noise sources which would interfere with surrounding residential uses.
		Source Documents: 31
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 served by a US EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole-source aquifer.
		Source Documents: 13
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No	The project site is not located near, or within, a wetland area. Therefore, the project would not affect wetland or riparian areas. Source Document(s): 14
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No	No Wild and Scenic Rivers are located within the City and County of San Francisco. Source Document(s): 15
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No	The buildings currently serve low-income and minority populations. The Alemany Apartments are located in census blocks which are made up of 51% ethnic minorities. The project would not result in disproportionately adverse environmental effects on minority or low income populations. Rehabilitation of existing residences and a new community center would enhance the quality of life for existing residents and the community. Source Documents: 16, Attachment 3

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been

provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

Impact Codes: Use an impact code from the following list 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
		LAND DEVELOPMENT
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project site is currently used for affordable housing by SFHA. The structures on-site consist of 23 primarily two-story apartment buildings, a small community center and a pre-school building. The project site is located in an area that is primarily comprised of residential land uses. Uses in the vicinity include single-family residences and Saint Mary's Recreation Center and park. The project site is currently zoned RM-1 – Residential – Mixed Low Density (1 Unit per 800sf) under the San Francisco Zoning Code. The project site is located in the 40-X height and bulk district. The project proposes to continue the existing uses on site. Overall the number of residential units would decrease from 158 to 150. The two proposed new buildings have a smaller building area than the two buildings that would be demolished resulting in a net reduction in building area. Source Document(s): 7, 8, 17
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	Topography The project site is situated at an elevation of about 100 feet above sea level with topography sloping down to the southeast. The adjacent topography slopes down to the southeast as well. The project does not propose to substantially alter existing site topography. <u>Regional Geology</u> The project site is located in the Coast Ranges Geomorphic Province. The province is characterized by northwest-southeast trending mountains and faults sub-parallel to the San Andreas Fault Zone. The province is comprised of marine and terrestrial sedimentary deposits underlain by Salinian Block granitic rocks west of the San Andreas Fault Zone.

			Site Geology
		p.	According to the US Geologic Map (San Francisco South 7.5' Quadrangle and part of Hunters Point 7.5' Quadrangle, 1998), the project site is underlain by artificial fill, greenstone and serpentine. The artificial fill is described as clay, silt, rock fragments, organic matter and manmade debris which is noted as being placed over tidal flats in a portion of the site. Greenstone is comprised of altered volcanic rocks, mostly basalt, hard to soft depending up on weathering, grayish olive to olive gray, and dark yellow-orange to light brown where highly weathered. Serpentine is described to be hard to soft, generally greenish-gray, containing gabbro and diabase. The San Francisco Planning Department's CatEx Determination Layers Map states the project site contains areas potentially vulnerable to liquefaction or landslide and contains slopes of over 20%.
			Regional Groundwater Occurrence and Quality
			The site is located within the Islais Valley Groundwater Basin. According to the Regional Water Quality Control Board (RWQCB) Basin Plan for the San Francisco Bay Region, this basin has been assigned existing beneficial uses for industrial process and service supply, and potential beneficial uses for municipal and agricultural supply. The project does not propose to alter groundwater or increase groundwater demands.
			Stormwater
			Stormwater runoff at the project site enters the combined sewer and wastewater system. The project would not substantially change the amount of impervious surfaces on the project site, thus the project is not anticipated to significantly affect stormwater flows.
			Source Document(s): 9, 19, 20
	Hazards and	3	Hazardous Materials
	Nuisances including Site Safety and Noise		Based on findings presented above in "Contamination and Toxic Substances," the project site may contain contaminated soil. Presence of hazardous materials onsite would be considered an adverse impact and require mitigation as discussed in this document.
			Noise
e ^{se}			Construction noise as discussed above would be temporary and mitigated by compliance with the City's noise ordinance. The rehabilitated and replaced residential structures and new community center are not anticipated to introduce new permanent noise sources which would interfere with surrounding residential uses.
	Energy Consumption	1	The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulation as enforced by the Department of Building Inspection (DBI). Other than natural gas and coal fuel used to generate the electricity for the project, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource. The project site is served by utilities that serve the existing development at the site.
			Several components of the project would increase energy efficiency, which is

considered a beneficial effect, including: improved insulation, new electric meters, new HVAC systems, updated appliances and use of LED lighting.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
SOCIOECONOM	1IC	
Employment and Income Patterns	2	Construction on the project site would provide short-term construction work but would not affect employment in the long-term. No impact is anticipated from the proposed project on employment and income within the project area.
Demographic	3	Demographics
Character Changes, Displacement		The proposed project would not result in physical barriers or reduced access that would isolate a particular neighborhood or population group.
		The proposed project would not induce a substantial amount of unplanned growth. Construction would result in temporary, construction job growth at the project site as a result of the proposed project. It is anticipated that construction employees not already living in San Francisco would commute from elsewhere in the Bay Area rather than relocating to the neighborhood for a temporary construction assignment. Thus, construction is not anticipated to generate a substantial, unplanned population increase. The project would decrease the number of residential units on site and thus would result in a slight decrease to population.
		Displacement
		NEPA is concerned with the significance of the physical environmental effects associated with this displacement, as well as with the social effect of such displacement—specifically, the potential lessening or loss of community cohesion and public well- being. Community cohesion refers to the maintenance of connections in the community. Public well-being refers access to amenities that allow for the maintenance of a reasonable quality of life, including walkability, aesthetic quality, open space, and social connections.
		Residents will be relocated for a maximum of 90 days to facilitate the rehabilitation activities. Residents would be provided a relocation coordinator who would assist in evaluating the moving options, special needs of the households, and assistance in moving. The cost of the temporary housing for the existing residents would not increase as a result of the temporary relocation.
		Generally, a displaced person under the Uniform Relocation Act (URA) is an individual, family, partnership, association, corporation, or organization, which moves from their home, business, or farm, or moves their personal property, as a direct

result of acquisition, demolition or rehabilitation for a federally funded project for a duration greater than 12 months. Therefore, residents temporarily relocated off-site using vouchers provided by the Housing Authority would be displaced for a maximum of 3 months a duration less than 1 year, and they would not be defined as "displaced" under the URA.
Residents would be inconvenienced by the relocation and the time and effort required to pack, move, and re-establish living routines—including locating and accessing community and commercial services—both when moving from their original units and when returning to the project site.
The relocation of residents could disrupt existing social networks because displaced residents would move to individual available units in various locations. This disruption of existing social networks could result in a lessening or loss of community cohesion and a lessening of public well-being. The impact would be minor and adverse which requires mitigation, namely the formulation of a Relocation Assistance Plan (RAP) in accordance with the URA. Source Document: 18

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY F	ACILITIE	S AND SERVICES
Educational and Cultural Facilities	1	The project would not displace educational or cultural facilities and would add a new community center on-site which would provide a cultural benefit. Cultural facilities within the City are accessible from the project site via public transportation. As the number of housing units will not increase, there would be no anticipated increase in demands on local schools.
Commercial Facilities	2	The project site is in an area primarily compromised of residential uses. South of the project site is Interstate 280 which provides easy route to commercial and retail services. The project is not anticipated to have an impact on any commercial facilities.
Health Care and Social Services	2	There is no increase in population due to the project activities and thus no increased demands on health and social service systems. Non-emergency health care services are located within a reasonable proximity to the proposed project. Social services are located both within a convenient and reasonable distance to residents of the project.
Solid Waste Disposal / Recycling	1	The Recology Sunset Scavenger Company provides residential and commercial garbage and recycling services for the City of San Francisco. Currently, solid waste generated in San Francisco is disposed of at Waste Management's Altamont Landfill in Alameda County. The City and County of San Francisco has proposed that starting in 2016, San Francisco's municipal solid waste will be

		transported to and disposed of at Recology's Hay Road Landfill. Recology Hay Road Landfill is permitted to accept up to 2,400 tons of waste per day, and, at this maximum rate of acceptance, the landfill has permitted capacity to continue to receive waste approximately through the year 2034. As the project would continue to serve existing residents it is not anticipated to create new solid waste demands.
		Some services provided by the proposed project would in fact have a beneficial impact on the solid waste disposal and recycling at the site, including adding new garbage/recycling and compost bin storage locations on site.
		Source Document(s): 21, 22, 23
Waste Water / Sanitary Sewers	2	Wastewater generated at the project site would be treated by the San Francisco Public Utilities Commission (SFPUC), which provides wastewater collection and transfer service in the City. The SFPUC has a combined sewer and wastewater system, which collects sewage and stormwater in the same pipe network. The CSS is divided into the Bayside and Westside drainage basins, which collect wastewater and stormwater from the east and west sides of the City, respectively, which are further divided into eight sub drainage areas. The project site is located in the Bayside Drainage Basin. Combined wastewater and stormwater from the project area is transported for treatment to the Southeast Water Pollution Control Plant. Treated wastewater is discharged to San Francisco Bay through outfalls at Pier 80 (dry and wet weather), and in Islais Creek (wet weather). During dry weather, the Southeast Water Pollution Control Plant has a dry weather capacity of 84.5 million gallons per day (mgd). During wet weather, the plant processes up to 250 mgd of combined wastewater.
		The CCS currently operates under National Pollutant Discharge Elimination System Permits. The Southeast Water Pollution Control Plant is currently operating under the 2008 NPDES Permit No. CA0037664 (Order No. R2-2008-0007) issued and enforced by the San Francisco Bay Regional Water Quality Control Board, which monitors discharge prohibitions, dry-weather effluent limitations, wet-weather effluent performance criteria, receiving water limitations, sludge management practices, and monitoring and reporting requirements. The permits prohibit overflows from the CSS structures during dry weather and require wet-weather overflows to comply with the nine minimum controls specified in the federal CSS Control Policy. As the proposed project would serve existing residents, does not increase residential density, would not substantially increase impervious surfaces, the project is not anticipated to increase demands on the CSS. Source Document(s): 24, 25

Water Supply	2	Water would be provided to the project by the SFPUC. As the proposed project would serve existing residents and does not increase residential density, the project is not anticipated to increase water demands.
Public Safety - Police, Fire and Emergency Medical	1	The project site is served by the Ingleside Police Station. The project site is served by the San Francisco Fire Department (SFFD) through Fire Station 32, located 0.7 to the northwest at 194 Park Street. SFFD firefighters are trained as emergency medical technicians, and some firefighters are also paramedics. Emergency medical response and patient transport is provided by SFFD, which also coordinates with Advanced Life Support and Basic Life Support Ambulance providers. Furthermore, San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes.
	20 20 21	The project site is currently serviced by police, fire and emergency medical services. As the project would not increase residential densities no increased demands are anticipated for these services. The proposed project would in fact provide a beneficial impact to police services by relocating a police substation to a newly constructed community building.
		Source Document(s): 26, 27
Parks, Open Space and Recreation	1	There are parks, recreational and cultural facilities within reasonable walking distance of the project site, as well as being accessible by public transportation. The project site is adjacent to a community garden and Saint Mary's Recreation Center and Park to the West. Holly Park is located one mile northwest of the project site. The project site includes courtyard areas with playground equipment and a community garden.
		The project proposes to remove and install a new playground, refurbish the existing basketball court and provide new landscape throughout the site. These changes are considered a beneficial effect.
		Source Document(s): 28
Transportation and Accessibility	1	The project site is adequately served by pedestrian, bicycle, transit, and parking facilities. Sidewalks and crosswalks are provided throughout the project area on all surrounding roadways. The site is accessible to emergency vehicles and disabled persons. The project includes accessibility improvements (new accessible ramps, new accessible parking spaces, accessibility upgrades to units) which would have a beneficial effect.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
NATURAL FEATU	RES	
Unique Natural Features, Water Resources	2	No unique natural, or water features are present onsite. Implementation of the project would not affect water resources, nor would it increase demands on groundwater resources. As noted above, water service would be provided by SFPUC. No surface waters (e.g., lakes, rivers, ponds) are located on or adjacent to the project site. Stormwater at the project would be collected and treated by CSS.
		Source: 14
Vegetation, Wildlife	3	The project site and surrounding area are developed. Trees are present on the project site which could potentially support nesting bird species protected under federal and state regulations. If project activities require tree removal, nesting bird species protected by state and federal regulations may be harmed. Loss of, or nest site disturbance which results in nest abandonment, loss of young, or the direct removal of vegetation that supports nesting birds, may result in the killing of nestlings or fledgling bird species, and would be considered an adverse impact and requires mitigation. Mitigation Measure 3 Nesting Bird Protection is included to reduce potential impacts to a less-than- significant level.
		Trees onsite are not considered street trees, however, some trees within 10 feet of a public right-of-way onsite may be defined by Article 16, Section 810A of the San Francisco Public Works Code as "significant." Permits may be required before trees determined to be "significant" can be removed. Removal of trees determined by the City of San Francisco to be "significant" without proper review by the Department of Public Works would be considered an adverse impact and requires mitigation. Mitigation Measure 4 Tree Inventory is included to reduce potential impacts to a less-than-significant level.
Other Factors		

Additional Studies Performed:

- 1. Rincon Consultants, Inc., 2015. Phase I Environmental Site Assessment, Alemany Boulevard San Francisco, California, HUD#CA001-9966. April 29, 2015.
- 2. Rincon Consultants, Inc., 2016. Phase II Environmental Site Assessment, Alemany Boulevard San Francisco, California. January 11, 2016.
- 3. Charles M. Salter Associates, 2015. Alemany Housing Preliminary Environmental Noise Study, CSA Project: 15-0230. April 28, 2015
- 4. Langan Treadwell Rollo, 2015. Geotechnical Investigation and Geologic Hazards Evaluation, Alemany Housing Renovation, San Francisco, California. August 3, 2015.

Field Inspection (Date and completed by):

- April 1, 2015; Rincon Consulting
- November 10, 2015; Confluence Environmental
- April 13-15, 2015; Charles M. Salter Associates
- May 14, 2015; Langan Treadwell Rollo
- February 10, 2016: ESA

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

- City/County Association of Governments of San Mateo County, 2012 (November). Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. Available: <u>http://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf</u>. Accessed November 9, 2015. Prepared by Ricondo & Associates, Inc., Jacobs Consultancy, and Clarion Associates.
- U.S. Fish and Wildlife Service, 2015 (Last Updated: June 3, 2015). Results of Coastal Barrier Resources System Mapper electronic database search for San Francisco, California. Available: http://www.fws.gov/cbra/Maps/Mapper.html. Accessed November 9, 2015.
- 3. City and County of San Francisco, 2008. Interim Floodplain Map, Citywide. Available: http://sfgsa.org/Modules/ShowDocument.aspx?documentid=1761. Accessed September 17, 2015.
- U.S. Federal Emergency Management Agency, 2015. Flood Map Service Center, San Francisco County. Available: <u>https://msc.fema.gov/portal/search?AddressQuery=845%20Ellsworth%</u> <u>20Street%2C%20San%20Francisco%2C%20CA</u> Accessed December 7, 2015.
- National Oceanic and Atmospheric Administration, 2015. Coastal Zone Management Program. Office for Coastal Management. Available: <u>http://coast.noaa.gov/czm/ mystate/?redirect=301ocm#california</u>. Accessed September 23, 2015.
- 6. City and County of San Francisco, 2008. Coastal Zone Area, San Francisco. Available: <u>http://www.sf-planning.org/index.aspx?page=2426</u> Accessed September 17, 2015.
- City of San Francisco, 2015a. City of San Francisco Planning Department Property Information Report for 900-1000 Ellsworth Street (odd) and 600-610 Alemany Street (odd). Available: <u>http://propertymap.</u> <u>sfplanning.org/</u>. Accessed December 7, 2015.
- City of San Francisco, 2015b. City of San Francisco Planning Department Property Information Report for 500-582 Alemany (even) and 845-999 Ellsworth Street (even). Available: <u>http://propertymap.</u> <u>sfplanning.org/</u>. Accessed December 7, 2015.
- Rincon Consultants, Inc., 2015. Phase I Environmental Site Assessment, Alemany Boulevard San Francisco, California, HUD#CA-001-966. Prepared for the Mayor's Office of Housing and Community Development, San Francisco, CA. April 29, 2015. Oakland, CA.
- California Department of Fish and Wildlife, 2015. California Natural Diversity Database, Results of electronic records search. Sacramento, California: California Department of Fish and Wildlife, Wildlife Habitat Data Analysis Branch. [USGS 7.5-minute topographic quadrangles Point Bonita, San Francisco North, Oakland West, Hunters Point, San Francisco South, San Mateo, Montara Mountain]. Accessed December 8, 2015.
- 11. U.S. Fish and Wildlife Service, 2015a. December 8, 2015—letter to Sarah Cannon regarding list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.
- Natural Resources Conservation Service. Results of electronic Web Soil Survey database. U.S. Department of Agriculture. Available: <u>http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx</u>. Accessed November 10, 2015.
- 13. U.S. Environmental Protection Agency, 2014. Sole Source Aquifers in Region 9. Available: <u>http://www.epa.gov/region9/water/groundwater/ssa.html</u> Accessed September 23, 2015.
- U.S. Fish and Wildlife Service, 2015b. National Wetlands Inventory, Results of electronic mapping search. Madison, Wisconsin: U.S. Fish and Wildlife Service, Division of Habitat and Resource Conservation Branch of Resource and Mapping Support. Available: <u>http://www.fws.gov/wetlands/Data/Mapper.html</u>. Accessed November 9, 2015.
- 15. National Wild and Scenic Rivers System, 2015. Electronic Database Search for National Wild and Scenic Rivers in California. Accessed at <u>http://www.rivers.gov/index.php</u>. Accessed on September 23, 2015.
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- 17. City of San Francisco, 2015. Zoning Map. Available: <u>http://www.sf-planning.org/modules/showdocument.aspx?documentid=9016</u>. Accessed on November 9, 2015.

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- 19. City of San Francisco, 2015. CatEx Determination Layers Map. Available: <u>http://www.sf-planning.org/index.aspx?page=2426</u>. Accessed November 9, 2015.
- California Regional Water Quality Control Board San Francisco Bay Region, 2015. San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan). Available: http://www.waterboards.ca.gov/sanfranciscobay/basin planning.shtml. Accessed on November 9, 2015.
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- City and County of San Francisco, 2015. Preliminary Negative Declaration for the Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County. Available: <u>http://www.sf-planning.org/index.aspx?page=1828</u>. Accessed September 24, 2015.
- City and County of San Francisco, 2015. Notice of Availability of and Intent to Adopt a Negative Declaration for the Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County. Available: <u>http://www.sf-planning.org/index.aspx?page=1828</u>. Accessed September 24, 2015.
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- 25. San Francisco Public Utilities Commission, 2010 (Revised August 10, 2010). Draft Sewer System Improvement Program Report for SFPUC Commission Review. Available: http://sfwater.org/modules/showdocument.aspx?documentid=984. Accessed September 24, 2015.
- San Francisco Police Department, 2015. City and County of San Francisco Police Department District Stations and Map. Available: <u>http://sf-police.org/index.aspx?page=796</u>. Accessed November 9, 2015.
- 27. San Francisco Fire Department. City and County of San Francisco Fire Department Fire Station Locations. Available: http://www.sf-fire.org/index.aspx?page=176. Accessed November 9, 2015.
- 28. San Francisco Recreation and Parks. SF Park Finder, Find-A-Destination. Available: http://sfrecpark.org/parks-open-spaces/find-a-destination/. Accessed November 9, 2015.
- 29. City and County of San Francisco. Programmatic Agreement by and among the City and County of San Francisco, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Historic Properties Affected by Use of Revenue from the Department of Housing and Urban Development Part 58 Programs. January 19, 2007.
- 30. Memorandum and attachments to Tina Tam from Eugene Flannery Re: Determination of Eligibility for Listing in the National Register of Historic Places for Hunters Point A East and Hunters Point A West, dated April 7, 2015.
- Charles M. Salter Associates, 2015. Alemany Housing Preliminary Environmental Noise Study. April 25, 2015.
- 32. City and County of San Francisco Planning Department, 2015. Expanded Maher Area. March 2015.
- California Air Resources Board. California Emissions Estimator Model (CalEEMod) User's Guide. July 2013
- 34. Bay Area Air Quality Management District. Adopted Air Quality CEQA Thresholds of Significance June 2, 2010.

ATTACHMENTS

- 1. Air Quality Emissions Output
- 2. Northwest Information Center Record Search Results
- 3. Environmental Justice Worksheet
- 4. Alemany Apartments Project Description dated October 28, 2015

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:

1. See Resident Outreach and Engagement Process to Support the RAD Transformation and Engagement Process to Support the RAD Transformation, San Francisco Mayor's Office of Housing and Community Development, Source Document: 18

Cumulative Impact Analysis [24 CFR 58.32]: The proposed project is not part of a series of activities. The project would not result in additional cumulative impacts from future related actions.

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

Offsite Alternative: Consideration of an off-site alternative is not warranted as a key component of the project is the rehabilitation of Alemany Apartments which is site specific.

No Action Alternative [24 CFR 58.40(e)]: The no action alternative would mean the continued deterioration of the existing facilities.

Summary of Findings and Conclusions: For several environmental issues, the project would result in minor adverse but mitigable impacts. No impacts are potentially significant to the extent that an Environmental Impact Statement would be required.

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

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

Mitigation Measure 1 – Site Mitigation Plan/Soil Management Plan. The project proponent shall include the following within a site mitigation plan (if required pursuant to the Maher Ordinance) or a soil management plan: a map delineating the areas of soil disturbance, analytical results of soil testing, and soil-handling procedures that segregate Class I from Class II or III fill material and isolate fill material from the underlying native soil. The plan would also include procedures for on-site observation and stockpiling of excavated soils during construction, soil sampling for focused waste classification purposes, and legal disposal at an appropriate disposal facility. In the event that the soil is characterized as hazardous waste according to state or federal criteria, the soil shall be disposed of at a Class I disposal facility. Soil classified as non-hazardous waste could be disposed of at a Class II or III disposal facility in accordance with applicable waste disposal regulations.

Mitigation Measure 2 - Health and Safety Plan. The project proponent shall prepare and implement a health and safety plan (HASP). The HASP shall meet the requirements of federal, state, and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of

the workers and the public, measures to protect public health and safety, and emergency response procedures. The HASP shall be submitted not less than two weeks prior to construction field work for any phase.

Mitigation Measure 3 - Nesting Bird Protection. The project proponent shall implement measures to protect nesting birds from harm during construction activities if nesting birds are present.

- *Vegetation Removal Timing Restrictions*. If feasible, conduct any tree removal during the non-breeding season (September 1 through February 1). If tree removal activities are scheduled to occur during the breeding season, pre-construction bird surveys shall be performed prior to the start of removal.
- Conduct Nesting Bird Avoidance. If active nests are found within trees slated for removal, project-related construction shall be delayed to be conducted outside the nesting season (February 1 through September 1), or no-disturbance buffer zones shall be established to prohibit project-related construction activities near the nest. If nesting individuals are observed, a qualified biologist shall implement an appropriately sized no-disturbance buffer zone. No-disturbance buffer zones shall be delineated by highly visible temporary fencing and shall remain in place until the young have fledged. No project-related construction activity shall occur within the no-disturbance buffer zone until a wildlife biologist confirms that the nest is no longer active, or unless otherwise permitted by CDFW.

Mitigation Measure 4 - Tree Inventory. Prior to the removal of any trees within 10 feet of the public right-of-way, conduct a tree inventory to determine if any trees are considered "significant" under Article 16, Section 810A, of the San Francisco Public Works Code.

Law, Authority, or Factor	Mitigation Measure
San Francisco Construction Dust Control Ordinance (San Francisco Health Code Article 22B, and San Francisco Building Code Section 106.3.2.6)	All site preparation work, demolition, or other construction in San Francisco that could create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil, must comply with specified dust control measures.
National Emissions Standards for Hazardous Air Pollutants and the Bay Area Air Quality Management District Regulation 11, Rule 2	Removal of asbestos would be conducted in accordance with these laws.
Cal/OSHA lead standards (Title 8, CCR Section 1532.1); HUD Lead Safe Housing Rule 24 CFR Part 35; Chapter 34 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979	Lead-based paint disturbance, remediation and stabilization associated with the proposed project will comply with these laws.

Buildings and Steel Structures	
Maher Ordinance (Article 22A of the San Francisco Health Code).	Disturbance of 50 cubic yards or more would require coordination with San Francisco Department of Public Health to determine if additional soil investigation is required in compliance with this law.
24 CFR Part 51 Subpart B	It is a HUD goal that the interior auditory environment shall not exceed a day-night average sound level of 45 decibels. Attenuation measures to meet these interior goals shall be employed where feasible.
San Francisco Noise Ordinance (Article 29 of the Police Code)	The ordinance established acceptable noise levels for construction activities unless a special permit is authorized by the Director of Public Works.
Uniform Relocation Act	 The San Francisco Housing Authority will prepare a Relocation Assistance Plan (RAP). The RAP will describe criteria for financial assistance for replacement housing, and reimbursement criteria for moving costs and/or different housing costs (including rents). Residents unable to relocate on site would be given housing vouchers by the Housing Authority for relocation elsewhere during the construction period.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27] The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27] The project may significantly affect the quality of the human environment.

Preparer Signature

Date: February 29, 2016

Name/Title/Organization: Eugene T. Flannery, Environmental Compliance Manager, San Francisco Mayor's Office of Housing and Community Development

Certifying Officer Signature: _

Date: February 29, 2016

Name/Title: Katha Hartley, Deputy Director, San Francisco Mayor's Office of Housing and Community Development

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

