



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

**Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** Bayside Elderly Housing

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

**Grant Recipient** (if different than Responsible Entity): Chinatown Community Development Center

**State/Local Identifier:**

**Preparer:** Flannery Eugene

**Certifying Officer Name and Title:** Eric D. Shaw, Director, Mayor’s Office of Housing and Community Development

**Consultant** (if applicable):

**Direct Comments to:** Eugene T. Flannery, Environmental Compliance Manager, MOHCD, One South Van Ness Avenue, 5<sup>th</sup> Floor, San Francisco, CA 94103

**Project Location:** APN 0160/031-032, 777 Broadway, San Francisco, CA 94133

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

BAYSIDE ELDERLY HOUSING at 777 Broadway is sited on 0.26 acre, slightly sloping up towards west in a mixed-use neighborhood adjacent to other mixed-use buildings with commercial at grade and residential above. A large-scale 100% affordable housing is located directly west in an overall urban area just over a mile from Interstate Highway 80 and Oakland-Bay Bridge. The 30 Studios + 1 one-bedroom manager’s unit serve low-income seniors 62 years of age or older. The stucco clad three-story wood-frame construction over a single-story CMU ground floor garage owned by San Francisco Housing Authority (SFHA). The improvements are built with air rights in 1990 with an elevator. The building has concrete foundation with continuous footings at perimeter walls and isolated spread footing at columns. This building has HUD Section 202 loan, which has received approval from HUD to be prepaid by the new syndication under Throughline, LP.

<b>EXTERIOR REPAIRS</b>
Repair stucco and fascia board, and paint
Replace windows to prevent moisture infiltration.
Repair leaks at podium drains / Waterproof decking (repair traffic coating)
Repair or replace stair handrails and fencing at podium for safety measures
Install storefront entry with auto opener and replace storefront courtyard doors
Replace damaged louver and downspouts

Install structural supports for Solar Thermal system
<b>BUILDING SYSTEM IMPROVEMENTS</b>
Upgrade fire/life safety systems as required
Replace faucets, showerheads and toilets with water saving fixtures as required
Replace bathroom exhaust fans with higher horse power, time delay-controlled, energy efficient units
Update elevator machinery based on inspection
Interconnect doorbells at Mobility and Communication units
Repair gasket at bottom door rail at courtyard entry to prevent leakage
Update elevator controls if required per ADA
Install solar thermal hot water system
Install 'smart' DHW tank & circulation loop temp control
<b>COMMON AREA IMPROVEMENTS</b>
Replace interior door hardware with lever hardware
Reconfigure leasing office reception window to make accessible, and replace fixtures and finishes
Replace community room cabinets, counters, door hardware, appliances and fixtures to be ADA compliant
Upgrade laundry room for accessibility
Replace existing stair guardrail/handrail
Install directional signage, floor plans and unit signage with braille
Install auto opener and actuator at trash room doors
Install new accessible mailboxes
Replace flooring
Repair and paint ceilings and walls
Replace ranges, incorporating ADA-compliant controls; vented hood, refrigerator
<b>LIVING UNIT IMPROVEMENTS</b>
Paint unit interiors
Replace unit entry door hardware with lever hardware
Replace old flooring
Replace plumbing fixtures, faucets, showerheads and toilets with low flow fixtures
Replace old sinks and vanities
Refurbish or replace bathtubs, surrounds, tub traps, mixing valves and shower controls
Replace kitchen cabinets, countertops and backsplash at range
Replace window coverings with vinyl blinds

**Level of Environmental Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5. This proposal is determined to be categorically excluded according to:

24 CFR §58.35(a)(ii): Rehabilitation of multifamily residential buildings and improvements when the following conditions are met:

- A. Unit density is not changed more than 20 percent;
- B. The project does not involve changes in land use from residential to non-residential; and
- C. The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

Additionally, those activities not related to acquisition and rehabilitation are exempt per 24 CFR 58.34(a)(1) Environmental and other studies, resource identification and the development of plans and strategies; (a)(5) Inspections and testing of properties for hazards or defects; (a)(8) Engineering or design costs.

---

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
B-15-MC-06-0016	CDBG	\$2,202,000

**Estimated Total HUD Funded Amount:** \$2,202,000

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

Rehabilitation Costs:	\$7,000,000
Non-Construction Costs:	\$

**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.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project does not lie within an Airport Clear Zone or Accident Potential Zone.  Source Document: 1. 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 <a href="https://ccag.ca.gov/wp-content/uploads/2018/01/SFO-AIA-B.pdf">https://ccag.ca.gov/wp-content/uploads/2018/01/SFO-AIA-B.pdf</a> Prepared by Jacobs Consultancy, and Clarion. 2. Google Earth Pro, Distance to SFO, August 23, 2021
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not located in a coastal barrier resource area.  Source Document: 1. 16 USC §3501(a)(1) which defines the locations of coastal barrier resource areas. The Pacific Coast of the Continental United States is not included in that definition.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project involves the rehabilitation of a residential building. The project site is not located in a FEMA designated Special Flood Hazard Area.</p> <p>The project is located in an area of minimal flood hazard Zone X. See map Number 0602980116A, effective March 23, 2021. The project would not involve either direct or indirect support of development in a floodplain.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. City and County of San Francisco Interim Floodplain Map. Internet Web Site: <a href="https://sfgsa.org/san-francisco-floodplain-management-program">https://sfgsa.org/san-francisco-floodplain-management-program</a> Accessed on August 23, 2021.</li> <li>2. United States Federal Emergency Management Administration. FEMA Issued Flood Maps, San Francisco County. Internet Web Site: <a href="https://msc.fema.gov/arcgis/rest/directories/arcgis/jobs/nfhl_print/mscprintb_gpserver/j759f16a5502a4cc0bda2e1ab26aa071b/scratch/FIRMETTE_41686db8-7c45-472e-b0f7-d51df93b63be.pdf">https://msc.fema.gov/arcgis/rest/directories/arcgis/jobs/nfhl_print/mscprintb_gpserver/j759f16a5502a4cc0bda2e1ab26aa071b/scratch/FIRMETTE_41686db8-7c45-472e-b0f7-d51df93b63be.pdf</a></li> </ol> <p>Accessed on August 23, 2021.</p>
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project does not involve acquisition of undeveloped land, a change in land use, major rehabilitation that would cost 75% or more of the property value, or new construction. The project does not meet thresholds for review by the Bay Area Air Quality Management District (BAAQMD) for air quality impacts, as it is minor in nature; thus, the project conforms to the State Implementation Plan (SIP).</p> <p>Air Pollutant Exposure Zone, San Francisco <a href="#">Health Code Article 38</a> - Site is located in an area with elevated pollutant concentrations. Sensitive use buildings, as defined in the Applicability section of the Ordinance, must comply with Health Code Article 38. However, the project is not a major rehabilitation project as defined by the San</p>

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>Francisco Green Building Code and compliance with Health Code Article 38 is not required.</p> <p>Based on the age of the onsite structure (constructed in 1990), there are no findings regarding asbestos-containing materials and lead-based paint on the Site.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. San Francisco Property Information Map, <a href="https://sfplanninggis.org/pim/">https://sfplanninggis.org/pim/</a>, site accessed on August 23, 2021</li> <li>2. Rincon Consultants, Inc., Phase I Environmental Site Assessment Bayside Elderly Housing, 777 Broadway, San Francisco, CA, February 10, 2020, Project number 20-09186</li> </ol> <p>Mitigation Measures: None Required:</p>
<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The San Francisco Bay Conservation and Development Commission (BCDC) has permit authority over San Francisco Bay and lands located within 100 feet of the Bay shoreline.</p> <p>BCDC’s San Francisco Bay Plan is the Coastal Zone Management Program for the San Francisco Bay Segment of the California Coastal Zone Management Program, pursuant to the Federal Coastal Zone Management Act (CZMA).</p> <p>Under the CZMA, projects requiring federal approval or funding must, to the maximum extent practicable, be consistent with a state’s coastal management program if the project would affect the coastal zone.</p> <p>The project site is located more than 100 feet from the San Francisco Bay shoreline; therefore, no formal finding of consistency with the San Francisco Bay Plan is required. The project activity does not involve activity within a Coastal Zone Management Area (CZM) area.</p> <p>Source Documents:</p>

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>1. San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Adopted 1973. Reprinted in February 2008.  <a href="http://www.bcdc.ca.gov/laws_plans/plans/sfbay_plan.shtml">http://www.bcdc.ca.gov/laws_plans/plans/sfbay_plan.shtml</a></p> <p>2. United States National Oceanic and Atmospheric Administration. State Coastal Zone Boundaries, California. Internet Web Site:  <a href="http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf">http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf</a></p> <p>3. San Francisco Property Information Map:  <a href="https://sfplanninggis.org/pim/">https://sfplanninggis.org/pim/</a></p>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No  <input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Rincon performed a reconnaissance of the subject property on January 30, 2020. The purpose of the reconnaissance was to observe existing conditions and to obtain information indicating the presence of recognized environmental conditions (RECs) in connection with the subject property.</p> <p>The search of regulatory database search was conducted by Environmental Data Resources (EDR) for sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The search was conducted for the subject property and included data from surrounding sites within a specified radius of the property. The subject property was listed in the EDR Historical Auto Station database searched by EDR. This listing indicates that an automobile repair facility was present onsite (775 Broadway Street) in 1925. No additional information was provided by EDR or available on the State Water Resources Control Board's (SWRCB's) online GeoTracker database. Records were requested from the City and County of San Francisco Local Oversight Program (LOP) on January 29, 2020, and on the same day the LOP indicated that no records are available for 775 Broadway Street.</p>

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>Five adjacent properties were listed in databases searched by EDR. Three of those properties have the potential to impact the subject property:</p> <p>To evaluate the potential subject property impact associated with the historical use of adjacent and nearby properties as laundromats/cleaners, Rincon recommends conducting a soil vapor assessment at the Site.</p> <p>In the Phase II Soil Vapor Assessment conducted on March 2, 2020 Volatile Organic Compounds (VOCs) were not detected above laboratory reporting limits in the soil vapor samples analyzed.</p> <p>Based on the results of the Phase II ESA, no additional assessment is recommended for the subject property.</p> <p>A search of Envirostor returned two reported cases within 2,000 feet of the project site.</p> <p>801 Montgomery is undergoing evaluation and has been referred to the local oversight agency. No further information is available. 801 Montgomery is down gradient from the project site and should not pose a risk of harm to the project participants.</p> <p>The second site, Dick Lee Pastry-Stanley Apartments, was referred to the oversight agency for evaluation (San Francisco Regional Water Resource Control Board). No further information is available. Due to the nature of the project activities and the fact that the Pastry shop is down gradient from the project site no risk of harm to project participants is expected.</p> <p>A search of Geotracker returned two sites within a 2,000-foot radius. Both sites are down gradient from the project site and do not pose a risk of harm to project participants.</p> <p>Radon gas sampling was conducted at the Bayside Elderly Housing property, a total of eleven radon measurements were collected. All eleven laboratory results were below the EPA "action level" for radon of 4.0 pico Curies per liter (pCi/L).</p>



<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. California State Water Resources Control Board Geo Tracker Website: <a href="https://geotracker.waterboards.ca.gov/map/?CMD=runreport&amp;myaddress=777+Broadway+San+Francisco+CA#">https://geotracker.waterboards.ca.gov/map/?CMD=runreport&amp;myaddress=777+Broadway+San+Francisco+CA#</a> Site accessed August 23, 2021.</li> <li>2. California Department of Toxic Substance Control Envirostor website: <a href="https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=777+Broadway+San+Francisco+CA">https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=777+Broadway+San+Francisco+CA</a> Site accessed on August 23, 2021.</li> <li>3. Rincon Consultants, Inc., Phase I Environmental Site Assessment Bayside Elderly Housing, 777 Broadway, San Francisco, CA, February 10, 2020, Project number 20-09186</li> <li>4. Rincon Consultants, Inc., Phase II Environmental Site Assessment Bayside Elderly Housing, 777 Broadway, San Francisco, CA, March 5, 2020, Project number 20-09186</li> <li>5. Radon Sampling Results Letter, 777 Broadway, San Francisco, CA, February 28, 2020, Project number 20-09186</li> </ol>
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project activity involves a previously developed urban property 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 identified species' habitat requirements. There are no critical habitats at this location.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. U.S. Fish and Wildlife Services Information for Planning and Consultation Website (IPaC). <a href="https://ecos.fws.gov/ipac/location/YVL7UIO5M5AIRAH4XGOTVKBJYI/resources">https://ecos.fws.gov/ipac/location/YVL7UIO5M5AIRAH4XGOTVKBJYI/resources</a>            Accessed on August 23, 2021.</li> </ol>

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>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. The project does not involve explosive or flammable materials or operations.</p> <p>No evidence of current or former ASTs or USTs was observed during the site reconnaissance.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51</li> <li>2. San Francisco Department of Public Health List of Above Ground Storage Tanks in San Francisco,</li> <li>3. United States Department of Housing and Urban Development. Siting of HUD-Assisted Projects Near Hazardous Facilities: Acceptable Separation Distances from Explosive and Flammable Hazards. Office of Community Planning and Development, Office of Environment and Energy. Washington, CD September 1996.</li> <li>4. ACC Environmental Consultants, Phase I Environmental Site Assessment Report, 1204 Mason Street, San Francisco, California 94108 Acc Project Number 1628-031.01, May 29, 2021</li> </ol>
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>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.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. United States Department of Agriculture. 7 CFR Part 658.2(a) Farmland Protection Policy Act</li> <li>2. United States Department of Agriculture, Natural Resources Conservation Services. Web</li> </ol>

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>Soil Survey. Internet Web Site: <a href="http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx">http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx</a>. Accessed on August 23, 2021.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No  <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The Federal Emergency Management Agency [24 CFR 55, Executive Order 11988] (FEMA) prepares Flood Insurance Rate Maps (FIRMs) that identify areas subject to flood inundation, most often from a flood having a one percent chance of occurrence in a given year (also known as a “base flood” or “100-year flood”). FEMA refers to the portion of the floodplain or coastal area that is at risk from floods of this magnitude as a Special Flood Hazard Areas (SFHA).</p> <p>The project is not within a known FEMA floodplain nor within the preliminary Flood Insurance Rate Map prepared for the City and County of San Francisco in November 2015. The project is located in an area of minimal flood hazard Zone X. See map Number 0602980116A, effective march 23, 2021. The project would not involve either direct or indirect support of development in a floodplain.</p> <p>Source Documents:</p> <p>1. City and County of San Francisco Interim Floodplain Map. Internet Web Site: <a href="https://sfgsa.org/san-francisco-floodplain-management-program">https://sfgsa.org/san-francisco-floodplain-management-program</a> Accessed on August 23, 2021.</p> <p>2. United States Federal Emergency Management Administration. FEMA Issued Flood Maps, San Francisco County. Internet Web Site: <a href="https://msc.fema.gov/arcgis/rest/directories/arcgis/jobs/nfhl_print/mscprintb_gpserver/j759f16a5502a4cc0bda2e1ab26aa071b/scratch/FIRMETTE_41686db8-7c45-472e-b0f7-d51df93b63be.pdf">https://msc.fema.gov/arcgis/rest/directories/arcgis/jobs/nfhl_print/mscprintb_gpserver/j759f16a5502a4cc0bda2e1ab26aa071b/scratch/FIRMETTE_41686db8-7c45-472e-b0f7-d51df93b63be.pdf</a></p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No  <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The building was constructed in 1990. As such, it is not a historic resource and is not subject to the National Historic Preservation Act</p> <p>No Historic Properties are Affected.</p>

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Source Documents: 1. City and County of San Francisco. Programmatic V Agreement by and among the City and County of Son 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; 2. City of San Francisco Planning Department Property Information Map, <a href="http://ec2-50-17-237-182.compute-1.amazonaws.com/PIM/?dept=planning">http://ec2-50-17-237-182.compute-1.amazonaws.com/PIM/?dept=planning</a> , Site accessed on August 23, 2021 3. United States Advisory Council on Historic Preservation. 36 CFR Part 800 Protection of Historic Properties.
<b>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project would not create new noise sources and would have no noise impacts under HUD guidelines.  Source Documents: 1. United States Department of Housing and Urban Development: The Noise Guidebook Environmental Planning Division, Office of Environment and Energy. September 1900. 2. United States Department of Housing and Urban Development Environmental Criteria and Standards. 24 CFR Part 51
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	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 subject to the HUD EPA MOU.  Source Documents: 1. United States Environmental Protection Agency. Sole Source Aquifers subject to HUD-EPA Memorandum of Understanding, dated September 30, 1990.

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>2. United States Environmental Protection Agency. Sole Source Aquifers in Region 9. Internet Websites:  <a href="https://19january2017snapshot.epa.gov/www3/region9/water/groundwater/ssa.html">https://19january2017snapshot.epa.gov/www3/region9/water/groundwater/ssa.html</a>            Accessed on August 23, 2021.</p>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No  <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The project activities are not located near any coastal, riparian or bayfront wetlands. Therefore, the Proposed Action would not affect wetland or riparian areas.</p> <p>Source Document:</p> <p>1. United States Fish and Wildlife Service, Division of Habitat and Resource Conservation. Wetlands Geodatabase. Internet Web Site:  <a href="http://www.fws.gov/wetlands/Data/Mapper.html">http://www.fws.gov/wetlands/Data/Mapper.html</a>            Accessed on August 23, 2021.</p>
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1973, particularly section 7(b) and (c)</p>	<p>Yes    No  <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>No wild and scenic rivers are located within the City and County of San Francisco.</p> <p>Source Documents:</p> <p>1. United States National Park Service. Designated Wild and Scenic Rivers by State. California. Internet Web Site:  <a href="https://www.nps.gov/orgs/1912/plan-your-visit.htm">https://www.nps.gov/orgs/1912/plan-your-visit.htm</a>            Accessed on August 23, 2021.</p>
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes    No  <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The project would not result in disproportionately adverse environmental effects on minority or low-income populations as the project will not result in any significant impacts. The project does not involve displacement of residents. The rehabilitation activities would enhance the quality of life for low income residents of the complex.</p> <p>Source Documents:</p> <p>1. EPA NEPAAssist EJSCREEN tool:  <a href="https://ejscreen.epa.gov/mapper/">https://ejscreen.epa.gov/mapper/</a>            Site accessed on August 23, 2021</p>

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>2. HUD Guidance and Technical Advice, Environmental Justice.  <a href="http://portal.hud.gov/hudportal/HUD?srrv/programmoffices/commplanning/environment/review/iuse">http://portal.hud.gov/hudportal/HUD?srrv/programmoffices/commplanning/environment/review/iuse</a></p>

**Field Inspection** (Date and completed by


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

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

Law, Authority, or Factor	Mitigation Measure
	None Required

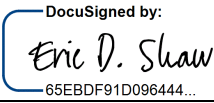
**Determination:**

- This categorically excluded activity/project converts to **EXEMPT** per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR
- This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds”** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

PREPARER SIGNATURE  August 31, 2021  
DocuSigned by: Eugene Flannery  
79FBD80165164B6

---

PREPARER NAME, COMPANY Eugene T. Flannery Mayor’s Office of Housing and Community Development, City and County of San Francisco DATE

RESPONSIBLE ENTITY  8/31/2021 | 4:59 PM PDT  
DocuSigned by: Eric D. Shaw  
65EBDF91D096444...

---

AGENCY OFFICIAL / SIGNATURE Eric D. Shaw, Director, Mayor’s Office of Housing and Community Development DATE

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).