



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
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**Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name: 951 Eddy Street RAD Conversion and Rehabilitation Project

AMP Number: 987-47

CA 0010000987B

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

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

State/Local Identifier:

Preparer: Eugene T. Flannery

Certifying Officer Name and Title: Olson M. Lee, 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, 5th Floor, San Francisco, CA 94103

Project Location: 951 Eddy Street, San Francisco, CA APN: 0744/012

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

The San Francisco Housing Authority seeks to convert public housing at 951 Eddy Street to funding under the federal Rental Assistance Demonstration Program (RAD) 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 most of the existing ACC-assisted portfolio. 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 Authority expects to have a Right of First Refusal and Option to Purchase the buildings back from the partnership after the 15 year tax credit compliance period for outstanding debt plus exit taxes. 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. The rehabilitation of the site will ensure long-term preservation of the property's historic significance.

Upon transfer of title, the property will be continued to be used for the provision of housing for income eligible residents. Unit density will not change. Repairs to the various elements and systems listed below will be made and deferred maintenance items will be addressed.

- Soft costs associated with the rehabilitation project;
- Accessibility upgrades;
- Replacement of original wood single pane windows with energy efficient units on courtyard side;
- Electrical upgrades;
- Replace flooring;
- HVAC improvements.

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: [Cite section(s)]

24 CFR §58.35(a)(5): Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.

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

Grant Number	HUD Program	Funding Amount
	RAD	

Estimated Total HUD Funded Amount: No HUD Funding

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

Rehabilitation Costs: \$2,422,000
Non-Construction Costs: \$6,578,000

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project does not lie within an Airport Clear Zone or Accident Potential Zone. Source Document: 1. San Francisco International Airport Master Plan. Adopted 1989
Coastal Barrier Resources 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.
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 <input type="checkbox"/> <input checked="" type="checkbox"/>	The project involves the acquisition, construction or rehabilitation of structures, buildings or mobile homes. The project site is not located in a FEMA designated Special Flood Hazard Area FEMA has not completed a study to determine flood hazard for the selected location; therefore, a flood map has not been published at 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 Documents: 1. City and County of San Francisco Interim Floodplain Map. Internet Web Site: http://sfgsa.org/index.aspx?page=828 Accessed on September 16, 2014.

	<p>2. United States Federal Emergency Management Administration. FEMA Issued Flood Maps, San Francisco County. Internet Web Site:</p> <p>https://msc.fema.gov/portal/search?AddressQuery=951%20Eddy%20Street%20San%20Francisco%20CA . Accessed on September 16, 2014..</p>
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STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<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>The building was constructed in 1900, 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.</p> <p>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.</p> <p>The Bay Area Air Quality Management District (District) regulates the demolition and renovation of buildings and structures which may contain asbestos, or milling and manufacturing of specific materials which are known to contain asbestos. The provisions that cover these operations are found in District Regulation 11, Rule 2. Because asbestos has been used extensively in residential, commercial and industrial construction, District Regulation 11-2-401.3 requires that for every renovation involving the removal of 100 sq ft/lin ft or greater of Regulated Asbestos Containing Material (RACM), and for every demolition (even when no asbestos is present), a notification must be made to the BAAQMD at least 10 working days (except in special circumstances) prior to commencement of demolition/renovation. When removing any Regulated Asbestos Containing Material, District regulations must be followed. Based on the construction of the onsite structure in approximately 1900, asbestos and lead based paint materials may be present onsite. Although</p>
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		<p>not considered a REC, renovation or demolition of the onsite structure would require an asbestos and lead-based paint survey and possibly abatement.</p> <p>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.</p> <p>In addition, 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.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> 1. Bay Area Air Quality Management District Regulation 11, Rule 2, The Bay Area Air Quality Management District 2. 951 Eddy Street, San Francisco, California, Phase I Environmental Site Assessment, Rincon Consulting, December 23, 2013. 3. U.S. Department of Housing and Urban Development, Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Office of Healthy Homes and Lead Hazard Control, Second Edition, July 2012
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The 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</p>

		<p>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> <ol style="list-style-type: none"> 1. San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Adopted 1968. Reprinted in February 2008. http://www.bcdc.ca.gov/laws_plans/plans/sfbay_plan.shtml 2. United States National Oceanic and Atmospheric Administration. State Coastal Zone Boundaries, California. Internet Web Site: http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf 3. San Francisco Property Information Map: http://ec2-50-17-237-182.compute-1.amazonaws.com/PIM/?dept=planning
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A Phase I Environmental Site Assessment (ESA) was completed by Rincon Consultants, Inc. for the project on December 23, 2013.</p> <p>Rincon Consultants performed a reconnaissance of the subject property on November 13, 2013. The purpose of the reconnaissance was to observe existing subject property conditions and to obtain information indicating the presence of recognized environmental conditions in connection with the subject property. The subject property is developed with a four-story apartment building built in approximately 1900. The property is currently operated by the San Francisco Housing Authority as affordable housing. One hydraulically powered elevator and two electric wheelchair lifts were observed. No leaks or spills were noted in the hydraulic pump room. With the exception of several 5-gallon cans of paint and standard cleaning supplies, the use, storage or disposal of hazardous materials on the subject property was not observed.</p>

The subject property is located in an area that is primarily comprised of residential and commercial land uses. Properties in the vicinity of the subject property include apartments, single family homes, a community garden, and a parking garage. EDR was contracted to provide a database search of public lists of sites that generate, store, treat or dispose of hazardous materials or sites for which a release or incident has occurred. The EDR search was conducted for the subject property and included data from surrounding sites within a specified radius of the property. Neither the subject property nor adjacent properties were listed in the databases searched by EDR.

Based on the findings of this Phase I ESA, no recognized environmental conditions were identified for the subject property during the completion of the Phase I ESA.

As indicated by the San Francisco Department of Public Health, downtown San Francisco properties typically may contain fill materials containing elevated levels of petroleum hydrocarbons and metals, as well as heating oil tanks, often found beneath sidewalks. Evidence of onsite fill materials or a heating oil tank was not discovered during the completion of the Phase I ESA. However, based on the age of the structure, a heating oil tank may be present onsite or may have been present onsite at one time. Additionally, fill materials may also be present. Because we have no evidence indicating that fill materials or heating oil tanks are present onsite or have been present on site, no additional assessment is recommended at this time.

A hydraulically operated piston elevator is present at the subject property. No leaks or spills were noted in the hydraulic pump room. There is the potential that below ground hydraulic equipment (e.g., piston) can leak hydraulic fluid, resulting in impacts to the subsurface. However, subsurface assessment (e.g., soil sampling) would be required to assess potential leakage from equipment below grade. Based on the fact that the site land use is not proposed to change and the fact that no leaks from the hydraulic equipment have been reported, the potential for subsurface hydraulic leaks is not likely to be the source of a health risk to occupants of the subject building

		<p>nor the subject of an enforcement action by regulatory agencies. Therefore, further soil assessment below the hydraulic equipment at this time was not recommended.</p> <p>Based on the construction of the onsite structure in approximately 1900, asbestos and lead based paint materials may be present onsite. Although not considered a REC, renovation activities would require an asbestos and lead-based paint survey and possibly abatement.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> 1. California State Water Resources Control Board Geo Tracker Website; http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=951+Eddy+Street+San+Francisco . Site accessed September 16, 2014. 2. EPA NEPAssist website: https://nepassist.epa.gov/nepassist/nepamap.aspx?action=searchloc&wherestr=951%20Eddy%20Street%20San%20Francisco%20CA Site accessed on September 16, 2014. 3. Rincon Consultants, December 23, 2013 Phase I Environmental Site Assessment
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The 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 these species' habitat requirements.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> 1. City of San Francisco Planning Department Property Information Map, http://ec2-50-17-237-182.compute-1.amazonaws.com/PIM/?dept=planning , site accessed on September 24, 2014. 2. City of San Francisco Planning Department. San Francisco General Plan. Internet Web Site: http://www.sf-planning.org/ftp/General_Plan/index.htm . Accessed on September 24, 2014. 3. California Department of Fish and Game. Natural Diversity Database Report, CNDDDB Wide Tabular Report, Federally Listed Species for San Francisco County. https://www.dfg.ca.gov/biogeodata/cnddb/ Site Accessed September 24, 2014

<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<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>Source Documents:</p> <ol style="list-style-type: none"> 1. United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51 2. San Francisco Department of Public Health List of Above Ground Storage Tanks in San Francisco, 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.
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The 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"> 1. United States Department of Agriculture, Natural Resources Conservation Services. Web Soil Survey. Internet Web Site: http://websoilsurvey.nrcs.usda.gov/app/WebSoilsurvey.aspx . Accessed on September 24, 2014.
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>FEMA has not completed a study to determine flood hazard for the selected location; therefore, a flood map has not been published at this time.</p> <p>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.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> 1. City and County of San Francisco Interim Floodplain Map. Internet Web Site: http://sfgsa.org/index.aspx?page=828 Accessed on September 16, 2014.

		<p>2. United States Federal Emergency Management Administration. FEMA Issued Flood Maps, San Francisco County. Internet Web Site: https://msc.fema.gov/portal/search?AddressQuery=951%20Eddy%20Street%20San%20Francisco%20CA . Accessed on September 16, 2014.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The undertaking involves the conversion of public housing at 951 Eddy Street to funding under the federal Rental Assistance Demonstration Program (RAD) 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 and associated rehabilitation activities.</p> <p>The City has consulted with the California State Historic Preservation Officer (“SHPO”) and the Advisory Council on Historic Preservation (“ACHP”) pursuant to Section 800.14(b) of the regulations, 36 C.F.R. Part 800, implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) and has executed a Programmatic Agreement with the California State Historic Preservation Officer and the Advisory Council on Historic Preservation which establish the City’s Section 106 responsibilities for the administration of undertakings which may have an effect on historic properties for undertakings subject to 24 CFR Part 58. .</p> <p>The City is required to comply with the stipulations set forth in the Programmatic Agreement for all Undertakings that (1) are assisted in whole or in part by revenues from the HUD Programs subject to 24 CFR Part 58 and that (2) can result in changes in the character or use of any Historic Properties that are located in an Undertaking’s Area of Potential Effect (“APE”).</p> <p>The San Francisco Mayor’s Office of Housing and Community Development reviewed the undertaking under 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).</p> <p>In accordance with Stipulation VII.D. of the PA,</p>

the City evaluated the using the National Register Criteria set forth in 36 CFR Section 60.4. The San Francisco Planning Department determined that the property is eligible for listing on the National Register of Historic Places on May 9, 2014. Per Stipulation VII of the 2007 PA (Identification and Evaluation of Historic Properties) Paragraph D, the Mayor's Office of Housing and Community Development (MOHCD) submitted the determination of eligibility for listing on the National Register of Historic Places to the California State Historic Preservation Officer for concurrence. MOHCD received no response to its request for concurrence. In accordance with Stipulation VII.D.1.d of the PA MOHCD has assumed that the SHPO does not object to the determination and shall proceed in accordance with the applicable requirements of the PA.

Undertakings limited exclusively to the activities listed in Appendix "A" of the PA have been determined to have no adverse effect on the property. Pursuant to Stipulation IV of the PA, APPENDIX A activities require only administrative review by the CITY and not the SHPO or the ACHP.

The project activities are included in the list of activities in Appendix A of the Programmatic Agreement which require only administrative review by the City and County of San Francisco and not the SHPO The undertaking is exempt from review by the SHPO or ACHP per Stipulation IV, Paragraph C. referencing Appendix A.

No Historic Properties are Adversely Affected.

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, <http://ec2-50-17-237-182.compute->

		<p>1. amazonaws.com/PIM//?dept=planning</p> <p>3. United States Advisory Council on Historic Preservation. 36 CFR Part 800 Protection of Historic Properties.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project would not create new noise sources and would have no noise impacts under HUD guidelines. The project does lie within 15 miles of San Francisco International Airport, but because the project would not significantly expand existing operations, this airport noise would not have an effect on the area.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> 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
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>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.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> 1. United States Environmental Protection Agency. Sole Source Aquifers subject to HUD-EPA Memorandum of Understanding, dated September 30, 1990. 2. United States Environmental Protection Agency. Sole Source Aquifers in Region 9. Internet Website: http://www.epa.gov/region9/water/groundwater/ss a.html <p>Accessed on September 24, 2014.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>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> <ol style="list-style-type: none"> 1. United States Fish and Wildlife Service, Division of Habitat and Resource Conservation. Wetlands Geodatabase. Internet Web Site: http://www.fws.gov/wetlands/Data/Mapper.html

		Accessed on September 24, 2014.
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>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: http://www.blm.gov/wo/st/en/prog/blm_special_areas/NLCS/Rivers.html#California Accessed September 24, 2014</p>
ENVIRONMENTAL JUSTICE		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project would not result in disproportionately adverse environmental effects on minority or low income populations. The rehabilitation activities would enhance the quality of life for low income residents of the complex. Residents would be relocated for no more than one week and would be provided replacement housing on site for the duration of the relocation. The rehabilitation activities are beneficial and would improve the health and well-being of the residents.</p> <p>Source Documents:</p> <p>1. EPA NEPAAssist website: https://nepassist.epa.gov/nepassist/analysis_new.aspx Site accessed on September 24, 2014.</p> <p>2. HUD Guidance and Technical Advice, Environmental Justice. http://portal.hud.gov/hudportal/HUD?srrv/programpoffices/commplanning/environment/review/iusUce</p>

Field Inspection (Date and completed by): November 13, 2013 Rincon Consulting

Summary of Findings and Conclusions: Based on the findings of the Phase I ESA, no recognized environmental conditions were identified for the subject property during the completion of the Phase I ESA. Rincon has performed a Phase I ESA in general conformance with the scope and limitations of ASTM E 1527-05 and ASTM E 1527-13 for the property located at 951 Eddy Street, San Francisco, California. This assessment has revealed no evidence of recognized environmental conditions in connection with the property.

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
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	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
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	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. Demolition of a deteriorated lead containing paint component would require waste characterization and appropriate disposal.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Based on the construction of the onsite structure in approximately 1900, asbestos and lead based paint materials may be present onsite. Although not considered a REC, renovation activities would require an asbestos and lead-based paint survey and possibly abatement.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Compliance with Stipulation VIII.B of 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. In particular, Undertakings involving Historic Properties but nevertheless exempt from review pursuant to Appendix "A" shall be designed to conform to the greatest extent feasible with the California State Historic Building code, [State of California, Title 24, Building Standards, Pat 8 ("SHBC")] as well as Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings, 1995.

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/RRF 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
PREPARER NAME, COMPANY


Eugene T. Flannery Mayor's Office of Housing
and Community Development, City and County
of San Francisco

September 30, 2014
DATE

RESPONSIBLE ENTITY
AGENCY OFFICIAL /
SIGNATURE
NAME, TITLE:


Olson Lee, Director, Mayor's Office of
Housing and Community Development

October 6, 2014

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).