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: 2451 Sacramento Street RAD Conversion and Rehabilitation Project

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: Katha Hartley, Deputy 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: 2451 Sacramento Street, San Francisco, CA 94114 APN: 3580/076

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 2451 Sacramento 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 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 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.
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.

The scope of rehabilitation activities will include the following:

Reconfiguration of the ground floor reconfiguration;
Enclosure of lobby;
Construction of new community room:
Renovations to laundry, community kitchen, offices and public restrooms;
Elevator modernization;
Accessibility upgrades;
Seismic Retrofit;
Upgrades to electrical and mechanical systems;
Sprinkler installation;
Renovations to tenant units.

**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)(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**

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>RAD</td>
<td></td>
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</table>

Estimated Total HUD Funded Amount: No HUD Funding

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

Rehabilitation Costs: $18,290,000
Non-Construction Costs: $29,000,000
Total Costs: $47,290,000.00
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.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</td>
<td></td>
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<tr>
<td>Airport Hazards</td>
<td>Yes No</td>
<td>The project does not lie within an Airport Clear Zone or Accident Potential Zone.</td>
</tr>
<tr>
<td>24 CFR Part 51 Subpart D</td>
<td>☐ ☒</td>
<td>Source Document:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>City/County Association of Governments of San Mateo County. Comprehensive Airport Land Use Compatibility Plan for the Environos of San Francisco International Airport. Adopted July 2012.</td>
</tr>
<tr>
<td>Coastal Barrier Resources</td>
<td>Yes No</td>
<td>The project is not located in a coastal barrier resource area.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☐ ☒</td>
<td>Source Document:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>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.</td>
</tr>
<tr>
<td>Flood Insurance</td>
<td>Yes No</td>
<td>The project involves the acquisition and rehabilitation of a housing development. The project site is not located in a FEMA designated Special Flood Hazard Area</td>
</tr>
<tr>
<td>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>☐ ☒</td>
<td>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.</td>
</tr>
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<td></td>
<td></td>
<td>Source Documents:</td>
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<tr>
<td></td>
<td></td>
<td>1. City and County of San Francisco Interim Floodplain Map. Internet Web Site:</td>
</tr>
</tbody>
</table>
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).

The building was constructed in 1968, before the 1978 federal ban on friable asbestos-containing building materials and lead-containing paints became effective. Therefore, project activities could result in a release of these materials. These matters are discussed below in the Contamination and Toxic Substances.


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.

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).

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.

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 Conservation and Development Commission (BCDC) is necessary.

Coastal Zone Management Act, sections 307(c) & (d)  Yes  No  ☐  ☒

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

Clean Air

Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93  Yes  No  ☒  ☐
Francisco Bay Plan is required. The project activity does not involve activity within a Coastal Zone Management Area (CZM) area.

Source Documents:

<table>
<thead>
<tr>
<th>Contamination and Toxic Substances</th>
<th>Yes</th>
<th>No</th>
</tr>
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<tbody>
<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
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</table>

Rincon completed a Phase I Environmental Site Assessment (ESA) of this site in March/April 2015. Based on the findings of the Phase I ESA, Rincon identified two Recognized Environmental Conditions (RECs) and two unknown environmental conditions in connection with the property as follows:

**Recognized Environmental Conditions**
- Location within Maher Ordinance Area and potential presence of fill material onsite
- Historic use of the subject property as an auto repair facility in 1913, a furniture manufacturing facility from 1915 through 1930, and possibly as a cleaners in 1930

**Unknown Environmental Conditions**
- Lead in soil on the subject property (originating from the use of lead-based paint)
- Historic adjacent and upgradient presence of multiple cleaning facilities to the north, east, and west of the subject property, from at least 1910 through 1966

Based on these findings, Rincon conducted a soil matrix and soil vapor assessment at the subject property to identify if: 1) elevated concentrations of metals, including lead, are present in soil beneath the site, and 2) elevated concentrations of volatile organic compounds (VOCs) are present in the soil vapor beneath the site.
Soil matrix samples were collected at depths of approximately 0.5-1.0 foot, 2.0-2.5 feet, and 4.0-4.5 feet bgs in the five borings. The soil matrix samples collected from 0.5-1.0 and 2.0-2.5 feet bgs were analyzed for lead by U.S. Environmental Protection Agency (EPA) Method 6010B. Total metals analysis by EPA Method 6010B/7470A (which did not include total lead) was performed on two samples (collected from boring 1 at 0.5-1.0 feet and 2.0-2.5 feet bgs) collected near the northwest corner of the site in the former auto repair area. With the exception of arsenic, analytical results indicated concentrations of metals and lead were within established Residential Screening Levels (RSLs) and California Human Health Screening Levels (CHHSLs) for residential soil.

Arsenic concentrations in boring 1 ranged from 2.8 to 3.1 milligrams per kilogram (mg/kg), which exceeded its established RSL of 0.67 mg/kg and its established CHHSL of 0.07 mg/kg. However, the concentrations of arsenic detected in the soil samples were within the range of the California Background Concentrations published by the Kearney Foundation (1996) (Table 1). Therefore, no further assessment of metals and lead impact to the subject property soil is warranted.

After completion of the soil matrix sampling, the five borings were set as single-depth soil vapor probes. After waiting approximately two hours between installations and sampling to allow subsurface conditions to return to equilibrium, TEG, under the direction of Rincon, collected one soil vapor sample from each of the five soil vapor probes. The samples were analyzed by TEG using their California Environmental Laboratory Accreditation Program (ELAP)-certified mobile laboratory. The samples were analyzed for VOCs by EPA Method 8260B. No VOCs were detected in any of the soil vapor samples collected. Therefore, no additional subsurface assessment regarding VOC contamination is recommended at the subject property.

RECOMMENDATIONS

Based on the known location of the subject property within a mapped Maher Ordinance Area, the project sponsor should communicate with the San Francisco Department of Public Health
(DPH), the San Francisco Planning Department, and the San Francisco Department of Building Inspection (DBI) regarding the proposed work effort to be completed.

Project applicants that plan to 1) seek a permit from the Department of Building Inspection and 2) move at least 50 cubic yards of soil may be required to coordinate with the San Francisco Department of Public Health, Site Assessment and Mitigation Program (DPH SAM Program) and may be required to complete a Phase II ESA.

It is likely that if more than 50 cubic yards of soil is to be disturbed at the subject property, sampling and analysis of the onsite fill materials will be required.

Based on the construction of the onsite structures in approximately 1968, asbestos and lead based paint (LBP) may be present onsite. Although not considered a REC, renovation or demolition of the onsite structures would require an asbestos and LBP survey and possibly abatement.

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.

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.

Source Documents:
1. Kennedy Towers, 2451 Sacramento Street, San Francisco, California, Phase I Environmental Site Assessment, Rincon Consulting, April 1, 2015
### Endangered Species

**Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402**

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<th>Yes</th>
<th>No</th>
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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.

**Source Documents:**

### Explosive and Flammable Hazards

**24 CFR Part 51 Subpart C**

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<tr>
<th>Yes</th>
<th>No</th>
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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.

**Source Documents:**
2. San Francisco Department of Public Health List of Above Ground Storage Tanks in San Francisco,
<table>
<thead>
<tr>
<th>Farmlands Protection</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
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</table>

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.

Source Documents:
1. United States Department of Agriculture. 7 CFR Part 658.2(a) Farmland Protection Policy Act

<table>
<thead>
<tr>
<th>Floodplain Management</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
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</table>

The Federal Emergency Management Agency [24 CFR 55, Executive Order 11988] (FE MA) 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). No finalized flood hazard zones have been mapped by the Federal Emergency Management Agency (FEMA) in San Francisco.

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:
Source Documents:
2. United States Federal Emergency Management Administration. FEMA Issued Flood Maps, San
Francisco County. Internet Web Site:  
[https://msc.fema.gov/portal/search](https://msc.fema.gov/portal/search)  

### Historic Preservation

<table>
<thead>
<tr>
<th>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</th>
<th>Yes</th>
<th>No</th>
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The building which was initially constructed in 1968 is less than 50 years old. As such it is not a potential historic resource and is not 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).

The San Francisco Mayor’s Office of Housing and Community Development has reviewed the project under the 2007 Programmatic Agreement and determined that the undertaking is exempt from review by the SHPO or ACHP per Stipulations II.A and IV.A.

Additionally, although the general vicinity of the proposed project has a moderate potential for historic-era archaeological resources, based on revised information submitted to the Northwest Information Center by the San Francisco Planning Department, the specific proposed Kennedy Towers - 2451 Sacramento St project is at a location “Not previously identified archeologically sensitive area. No further review required due to low sensitivity for prehistoric and historic period resources based on location and land use history”. Therefore, further study for archaeological resources is not recommended at this time.

No Historic Properties are Affected.

**Source Documents:**

1. City and County of San Francisco. Programmatic V 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;

2. City of San Francisco Planning Department Property Information Map, [http://ec2-50-17-237-
<table>
<thead>
<tr>
<th>Noise Abatement and Control</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</td>
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</table>

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.

Source Documents:
2. United States Department of Housing and Urban Development Environmental Criteria and Standards. 24 CFR Part 51

<table>
<thead>
<tr>
<th>Sole Source Aquifers</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
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</tr>
</tbody>
</table>

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:


<table>
<thead>
<tr>
<th>Wetlands Protection</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td>☒</td>
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</table>

The project activities are not located near any coastal, riparian or bayfront wetlands. Therefore, the Proposed Action would not affect wetland or riparian areas.
### Wild and Scenic Rivers

<table>
<thead>
<tr>
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<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>Wild and Scenic Rivers</td>
<td><img src="No" alt=" " /></td>
<td><img src="Yes" alt=" " /></td>
</tr>
</tbody>
</table>

No wild and scenic rivers are located within the City and County of San Francisco.

**Source Documents:**

### Environmental Justice

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Justice</td>
<td><img src="No" alt=" " /></td>
<td><img src="Yes" alt=" " /></td>
</tr>
</tbody>
</table>

The project would not result in disproportionately adverse environmental effects on minority or low income populations as the project does not involve displacement of residents. The rehabilitation activities would enhance the quality of life for low income residents of the complex.

**Source Documents:**
1. EPA NEPAssist website: [https://nepassist.epa.gov/nationalNEPAtools/NepaCall/analysis.aspx](https://nepassist.epa.gov/nationalNEPAtools/NepaCall/analysis.aspx) Site accessed on September 28, 2015.

### Field Inspection

(Date and completed by): Rincon Consultants performed a reconnaissance of the subject property on February 2, 2015 accompanied by Marshall Johnson, the site manager and Victor Bernal the site janitorial worker. 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 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.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contamination and Toxic Substances 24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td>Based on the known location of the subject property within a mapped Maher Ordinance Area, the project sponsor should communicate with the San Francisco Department of Public Health (DPH), the San Francisco Planning Department, and the San Francisco Department of Building Inspection (DBI) regarding the proposed work effort to be completed. Project applicants that plan to 1) seek a permit from the Department of Building Inspection and 2) move at least 50 cubic yards of soil may be required to coordinate with the San Francisco Department of Public Health, Site Assessment and Mitigation Program (DPH SAM Program) and may be required to complete a Phase II ESA. It is likely that if more than 50 cubic yards of soil is to be disturbed at the subject property, sampling and analysis of the onsite fill materials will be required.</td>
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<td>Contamination and Toxic Substances 24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td>Based on the construction of the onsite structures in approximately 1968, asbestos and lead based paint (LBP) may be present onsite. Although not considered a REC, renovation or demolition of the onsite structures would require an asbestos and LBP survey and possibly abatement. 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. 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</td>
</tr>
</tbody>
</table>
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)).

PREPARE SIGNATURE
PREPARE NAME, COMPANY  Eugene T. Flannery Mayor’s Office of Housing and Community Development, City and County of San Francisco  September 28, 2015

RESPONSIBLE ENTITY  September 28, 2015
AGENCY OFFICIAL / SIGNATURE
NAME, TITLE:  Karla Hartley, Deputy Director, 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).