



**U.S. Department of Housing and Urban  
Development**

451 Seventh Street, SW  
Washington, DC 20410  
www.hud.gov

[espanol.hud.gov](http://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:** Hayes Valley North RAD Conversion and Rehabilitation Project (650 Linden Street, San Francisco, CA 94102)

**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:** Brian Cheu, 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, 5<sup>th</sup> Floor, San Francisco, CA 94103

**Project Location:** Hayes North, APN 06-0820-026-01, 650 Linden Street, San Francisco, CA 94102

**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 650 Linden 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 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.

Hayes Valley North rehabilitation scope consists of a substantial renovation of the apartment units, exteriors, site work, mechanical and plumbing, and life, safety, and accessibility compliance.

#### Apartment Units and Exteriors

- Energy performance measures for code compliance
- Redesign accessible units to comply with current codes, including ADA requirements
- Replace kitchen appliances and casework, bathroom fixtures and accessories, and flooring
- Replace windows, security screens, garage door and exterior entry door, and interior doors on accessible routes in dwelling units
- Replace smoke alarms, water heaters, and mechanical heating equipment
- Repair and paint dwelling units and all building exteriors
- Replace roofing and repair/replace storm drainage systems on all buildings, including stucco repair and waterproofing enhancements
- Minor structural upgrades to existing balconies
- Repair patios and entry concrete

#### Roofing System and Sewers

- Replace roofing system
- Removal and installation of new main sewer lines within site
- Flashing and sheet metal
- Satellite platforms at roofs
- Gutter/downspout repair and replacement

#### Site Work and Landscape

- Replacement of courtyard areas with new more accessible pathways, gathering areas, and landscaping
- Frontage landscape, sitework, hard surface areas with accent paving
- Soil removal and clean soil backfill
- On-site accessible parking stalls and routes
- Street calming

#### Trash Enclosures

- Covering open-air trash enclosures with slabs, steel columns, and metal roof system
- Replacement of street gates around site with security hardware

#### **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**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
	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: \$33,000,000  
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 is not located within 3000 feet of a civil airport or within 15,000 feet of a military airfield, and therefore 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="http://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_A_LUCP_November-20121.pdf">ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_A_LUCP_November-20121.pdf</a> . Prepared by Ricondo & Associates, Inc., Jacobs Consultancy, and Clarion. Accessed May 20, 2020.
<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.  <a href="https://www.govinfo.gov/content/pkg/USCODE-2011-title16/pdf/USCODE-2011-title16-chap55-sec3501.pdf">https://www.govinfo.gov/content/pkg/USCODE-2011-title16/pdf/USCODE-2011-title16-chap55-sec3501.pdf</a> . Accessed May 20, 2020.
<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"/>	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

		<p>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 in November 2015. 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: <ol style="list-style-type: none"> <li>a. <a href="https://sfgsa.org/san-francisco-floodplain-management-program">https://sfgsa.org/san-francisco-floodplain-management-program</a> Accessed on May 20, 2020.</li> <li>b. <a href="https://sfgsa.org/sites/default/files/Document/SF_NE.pdf">https://sfgsa.org/sites/default/files/Document/SF_NE.pdf</a> Accessed on May 20, 2020.</li> </ol> </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/portal/search?AddressQuery#searchresultsanchor">https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor</a>. Accessed on May 20, 2020.</li> </ol>
--	--	---

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

<p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (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 buildings were constructed in 1998, after the 1978 federal bans on friable asbestos-containing building materials and lead-containing paints became effective. Based on a non-destructive pre-renovation hazardous materials survey SCA completed in November 2018, no building materials were found to contain &gt;1.0% asbestos at the Target Property. However, exterior window and door caulking from Building #6 contained trace (&lt;1%) asbestos. Some items were not sampled and assumed asbestos-containing pending “destructive testing”. These items include: baserock and soils under building slabs, waterproofing membranes and/or vapor membranes and associated tars/mastics under building slabs, and penetration mastics assumed present on the high building roofs.</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>Asbestos in soils: It is not uncommon for properties in this area to have naturally-occurring asbestos containing soils resulting from placement of surcharged soils or fill during construction. Based on SCA's Phase II Report (June 2019), soil sampling results showed on site soils contained between &lt;0.25% and 3.25% naturally occurring asbestos. SCA prepared an ADMP for soils work to be conducted. The Target Property is subject to the requirements of CARB's 2002-07-29 Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operation requirements. Refer to Section 3.3.1. and Section 3.3.4. Cal/OSHA Asbestos in Construction regulations also apply.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. Phase I Environmental Site Assessment, Hayes Valley North, APN 0820-026 642 Linden Street, San Francisco, CA 94102, February 2020, SCA Environmental, Inc.</li> <li>2. Phase II Environmental Site Assessment Report, Hayes Valley North, APN 0820-026 642 Linden Street San Francisco, CA 94102, June 2019, SCA Environmental, Inc.</li> <li>3. Bay Area Air Quality Management District Regulation 11, Rule 2, The Bay Area Air Quality Management District</li> <li>4. 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</li> </ol>
<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> <ol style="list-style-type: none"> <li>1. San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Adopted 1973. Reprinted in February 2008. <a href="https://bcdc.ca.gov/plans/sfbay_plan">https://bcdc.ca.gov/plans/sfbay_plan</a> Accessed on May 20, 2020.</li> <li>2. United States National Oceanic and Atmospheric Administration. State Coastal Zone Boundaries, California. Internet Web Site: <a href="https://coast.noaa.gov/data/czm/media/StateCZBoundaries.pdf">https://coast.noaa.gov/data/czm/media/StateCZBoundaries.pdf</a> Accessed on May 20, 2020.</li> <li>3. San Francisco Property Information Map: <a href="https://sfplanninggis.org/PIM/">https://sfplanninggis.org/PIM/</a> Accessed on May 20, 2020.</li> </ol>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No</p> <p><input checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>SCA Environmental Inc. prepared a Phase I Environmental Site Assessment (ESA) for the subject property. According to the Phase I ESA, paint and building material samples at the Target Property were found to contain measurable amounts of lead.</p> <p>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</p>

		<p>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>All loose and peeling paints should be stabilized prior to renovations or disturbance with paint chips collected. Dust control procedures should be implemented for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1 during any renovations. In addition, waste profiling should be completed by the contractor to characterize waste prior to disposal.</p> <p>Conventional demolition techniques should be employed for all painted surfaces and materials with measurable lead content with the Contractor complying with applicable OSHA and Cal/OSHA statutes regarding:</p> <ul style="list-style-type: none"> <li>• Worker awareness training;</li> <li>• Exposure monitoring, as needed;</li> <li>• Medical examinations, which may include blood lead level testing; and</li> <li>• Establishing a written respiratory protection program.</li> </ul> <p>The assessment revealed evidence of a recognized environmental condition in connection with the property. The REC is summarized below:</p> <ol style="list-style-type: none"> <li>1. A previous Phase I ESA completed by SCA in 2018 revealed that there had been many historical gas stations and cleaners in the general area of the Target Property within 1000 feet. This investigation also determined that the Target Property itself is included on the Maher Ordinance Map. This assessment also revealed evidence of historical recognized environmental conditions (Historical RECs) in connection with the property. These cases have resulted in the Target Property being included on the Maher Ordinance Map, and the Target Property is subject to the requirements of Article 22A. These are summarized below:</li> <li>2. According to Sanborn Maps and The City Directory, a gas station was present at the southwest corner of the Target Property at 680-698 Fell Street from before 1940 until at least 1958. A leaking underground storage tank</li> </ol>
--	--	--



		<p>(LUST) case was reported at this address, as well as one other address on the Target Property, 739 Hayes Street. Refer to Section 8.1 of the Phase I ESA for additional information.</p> <p>Recommendation: SCA has prepared a Site Mitigation Plan (SMP) and Dust Control Plan (DCP) on behalf of the project sponsor to fully mitigate these conditions. These plans were submitted to and approved by the San Francisco Department of Public Health (SFDPH) in June 2019. Sponsor has committed to implement these plans and their recommendations during construction at the site.</p> <p>The search of GeoTracker returned no open LUST sites within 1,000 feet of the project site.</p> <p>A search using NEPAassist indicated that the site is within 0.5 miles of 5 small quantity and 2 large quantity RCRA generators. All sites are in compliance with applicable regulatory authorities and no violations are listed, except the United States Mint, which has been in violation for the past 12 quarters.</p> <p>Source Document:</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=650+Linden+Street+SF">https://geotracker.waterboards.ca.gov/map/?CMD=runreport&amp;myaddress=650+Linden+Street+SF</a>. Accessed on June 29, 2020.</li> <li>2. EPA NEPAassist website: <a href="https://nepassisttool.epa.gov/nepassist/nepamap.aspx?wherestr">https://nepassisttool.epa.gov/nepassist/nepamap.aspx?wherestr</a> Accessed on June 29, 2020.</li> <li>3. Phase I Environmental Site Assessment, Hayes Valley North, APN 0820-026 642 Linden Street, San Francisco, CA 94102, February 2020, SCA Environmental, Inc.</li> <li>4. Phase II Environmental Site Assessment Report, Hayes Valley North, APN 0820-026 642 Linden Street San Francisco, CA 94102, June 2019, SCA Environmental, Inc.</li> </ol>
<p><b>Endangered Species</b></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"> <li>1. San Francisco Property Information Map: <a href="https://sfplanninggis.org/PIM/">https://sfplanninggis.org/PIM/</a> Accessed on May 20, 2020.</li> <li>2. City of San Francisco Planning Department. San Francisco General Plan: <a href="http://www.sf-planning.org/ftp/General_Plan/index.htm">http://www.sf-planning.org/ftp/General_Plan/index.htm</a>. Accessed on June 1, 2020.</li> </ol>
<p><b>Explosive and Flammable Hazards</b></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 involves the substantial rehabilitation of residential units. The overall residential densities of the project will not increase. 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, and the project does not include a hazardous facility.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. Phase I Environmental Site Assessment, Hayes Valley North, APN 0820-026 642 Linden Street, San Francisco, CA 94102, February 2020, SCA Environmental, Inc.</li> <li>2. United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51, Subpart C. 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, D.C., April 2013.</li> </ol>
<p><b>Farmlands Protection</b></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"> <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 Soil Survey: <a href="http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx">http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx</a>. Accessed on May 20, 2020.</li> </ol>

<p><b>Floodplain Management</b></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>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). FEMA released a preliminary FIRM for the City and County of San Francisco on November 12, 2015.</p> <p>The project is neither within a known FEMA floodplain nor within a SFHA on the preliminary FIRM. 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. San Francisco Floodplain Management Program: <a href="https://sfgsa.org/san-francisco-floodplain-management-program">https://sfgsa.org/san-francisco-floodplain-management-program</a>. Accessed on June 17, 2020.</li> <li>2. San Francisco Interim Floodplain Map, NE San Francisco: <a href="https://sfgsa.org/sites/default/files/Document/SF_NE.pdf">https://sfgsa.org/sites/default/files/Document/SF_NE.pdf</a>. Accessed on June 17, 2020.</li> <li>3. United States Federal Emergency Management Administration. FEMA Issued Flood Maps, San Francisco County: <a href="https://msc.fema.gov/portal/search?AddressQuery=650%20linden%20street%20San%20Francisco%20CA#searchresultsanchor">https://msc.fema.gov/portal/search?AddressQuery=650%20linden%20street%20San%20Francisco%20CA#searchresultsanchor</a> Accessed on June 17, 2020.</li> </ol>
<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</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The buildings were constructed in 1998 and are less than 50 years old. As such they are not potential historic resources and are 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).</p> <p>No Historic Properties are affected.</p> <p>Source Documents:</p> <ol style="list-style-type: none"> <li>1. City and County of San Francisco. Programmatic Agreement by and among the City and County of San Francisco, the California State</li> </ol>

		<p>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: <a href="https://sfmohcd.org/sites/default/files/FileCenter/Documents/2947-PAunderrevision.pdf">https://sfmohcd.org/sites/default/files/FileCenter/Documents/2947-PAunderrevision.pdf</a>. Accessed on June 17, 2020.</p> <p>3. United States Advisory Council on Historic Preservation. 36 CFR Part 800 Protection of Historic Properties: <a href="https://www.achp.gov/sites/default/files/regulations/2017-02/regs-rev04.pdf">https://www.achp.gov/sites/default/files/regulations/2017-02/regs-rev04.pdf</a>. Accessed on June 17, 2020.</p>
<p><b>Noise Abatement and Control</b></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  <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 is not located within 1,000 feet of a major road or highway or 3,000 feet of a railroad. 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> <p>1. United States Department of Housing and Urban Development: The Noise Guidebook Environmental Planning Division, Office of Environment and Energy, published March 2009.</p> <p>2. Final 14 Code of Federal Regulations Part 150 Study Update Noise Exposure Map Report for San Francisco International Airport, published August 2015: <a href="https://media.flysfo.com/media/sfo/noise-abatement/sfo_p150_nem_cover_toc_ada.pdf">https://media.flysfo.com/media/sfo/noise-abatement/sfo_p150_nem_cover_toc_ada.pdf</a>. Accessed on June 17, 2020.</p>
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No  <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> <p>1. United States Environmental Protection Agency. Sole Source Aquifers subject to HUD-EPA Memorandum of Understanding, dated September 30, 1990.</p> <p>2. United States Environmental Protection Agency. Sole Source Aquifers in Region 9: <a href="https://19january2017snapshot.epa.gov/www3/reg">https://19january2017snapshot.epa.gov/www3/reg</a></p>

		<a href="#">ion9/water/groundwater/ssa.html</a> . Accessed on June 17, 2020.
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project activities are not located near any coastal, riparian or bayfront wetlands. Source Document: 1. United States Fish and Wildlife Service, Division of Habitat and Resource Conservation. Wetlands Geodatabase: <a href="http://www.fws.gov/wetlands/Data/Mapper.html">http://www.fws.gov/wetlands/Data/Mapper.html</a> Accessed on June 17, 2020.
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1973, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No wild and scenic rivers are located within the City and County of San Francisco. Source Document: 1. United States National Park Service Wild and Scenic Rivers Program: <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 June 17, 2020.
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	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 NEPAAssist website: <a href="https://ejscreen.epa.gov/mapper/">https://ejscreen.epa.gov/mapper/</a> Accessed on June 17, 2020. 2. U.S. Department of Housing and Urban Development Environmental Justice Strategy: <a href="https://www.hud.gov/sites/documents/ENVJUSTICE.PDF">https://www.hud.gov/sites/documents/ENVJUSTICE.PDF</a> . Accessed on June 17, 2020.

**Field Inspection** (Date and completed by): **SCA Environmental Incorporated** performed a reconnaissance of the subject property in December 2019. The site visit was completed by Luke Swanson, CSST, CDPH on December 13, 2019. Previous site visits were completed in 2018, as was the hazardous materials survey at the Target Property. All areas of the property grounds, site office, parking lots, etc. were accessible to SCA during the site reconnaissance except for residential units. The purpose of the reconnaissance was to observe existing subject property conditions and to obtain information indicating the presence of RECs in connection with the subject property.

Storage Tanks: No storage tanks were identified at the subject property.

Hazardous Substances and Petroleum Products: No hazardous materials were identified in the Target Property's maintenance or mechanical areas. No unidentified containers were noted at the time of SCA's site reconnaissance.

SCA noted staining due to paint found on sidewalk. Staining did not appear to impact surface soil, and is considered to be *de minimus*. No other stains or discoloration was noted at the Target Property during the site reconnaissance.

Mercury containing lamps: Fluorescent light tubes are present throughout the buildings. Refer to Section 6.3.17 of the Phase I ESA. Recommendation: In their current state, the items are not an environmental concern. Prior to disturbance, the lamps should be removed and disposed of per applicable federal, state and local regulations.

The Target Property had no suspect CFC containing equipment of environmental concern.

**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	<p>Destructive sampling should be conducted to sample underlying vapor barriers or baserock if any paving or building slabs are to be impacted during renovation of the site. Prior to commencement of re-roofing, SCA recommends an inspection of the main roofs to identify if any suspect penetration mastic is present. If present, this material should be sampled to confirm asbestos content. If additional roofing materials/layers are identified during renovations on the main roofs those materials/layers should be considered asbestos-containing until such time as sampling can be performed to verify asbestos content.</p> <p>SCA prepared an Asbestos Dust Mitigation Plan (ADMP) for soils work to be conducted. The Target Property is subject to the requirements of CARB's 2002-07-29 Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operation requirements. Cal/OSHA Asbestos in Construction regulations also apply. SCA recommends all impacts to soil be performed in accordance with ADMP, as well as the requirements for the CARB's ATCM for Construction, Grading, Quarrying, and Surface Mining Operations.</p>
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	All loose and peeling paints should be stabilized prior to renovations or disturbance with paint chips collected. Dust control procedures should be implemented for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1 during any renovations. In addition, waste profiling

	<p>should be completed by the contractor to characterize waste prior to disposal. Conventional demolition techniques should be employed for all painted surfaces and materials with measurable lead content with the Contractor complying with applicable OSHA and Cal/OSHA statutes regarding:</p> <ul style="list-style-type: none"> <li>• Worker awareness training;</li> <li>• Exposure monitoring, as needed;</li> <li>• Medical examinations, which may include blood lead level testing; and</li> <li>• Establishing a written respiratory protection program.</li> </ul>
<p>Contamination and Toxic Substances 24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>The Target Property is listed in the Maher Ordinance Area of San Francisco and subject to the requirements of Article 22A for construction activities.</p> <p>Soils samples taken during the Phase II ESA have been pre-characterized for a variety of offsite management options. No hazardous waste was identified and the export soils appear suitable for disposal as nonhazardous waste at a Class II facility that can accommodate asbestos-containing soils, pending receiving facility acceptance.</p> <p>Given the findings of the Phase II, SCA prepared a Site Mitigation Plan (SMP) that was submitted and approved by SFDPH in June 2019. The SMP outlined the need for excavation in localized areas where Lead, Benzo(a)pyrene, and other PAHs were detected above relevant residential criteria. In addition, the SMP referenced vapor intrusion mitigation design that has been prepared and submitted to SFDPH for approval prior to building construction. SCA also prepared an Asbestos Dust Mitigation Plan (ADMP), as naturally-occurring asbestos was found in site soils.</p>

