



U.S. Department of Housing and Urban Development

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

espanol.hud.gov

Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5

Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: The Normandy Apartments

Responsible Entity: San Francisco Mayor's Office of Housing and Community Development
One South Van Ness Avenue, Fifth Floor
San Francisco, CA 94103

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Consultant Preparer: Leslie Slayday, MUP, Rincon Consultants Inc.

Responsible Entity Preparer: Madeleine Sweet, MOHCD Compliance Coordinator

Certifying Officer Name and Title: Brian Cheu, Director of Community Development

Consultant (if applicable): Rincon Consultants Inc.

Direct Comments to: Madeleine Sweet, MOHCD Compliance Coordinator,
Madeleine.Sweet@sfgov.org; 628-652-5983

Project Location: 1155 Ellis Street, San Francisco, California

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

The Normandy Project (herein referred to as "proposed project" or "project") is located at 1135, 1155, and 1175 Ellis Street, San Francisco, California on a developed 1.50-acre site in San Francisco County. The site is identified as Assessor's Block 0735 Lot 031. The site is currently developed with approximately 50 rental units in a four-story multi-family residential building. The surrounding area is characterized by multi-family residences and public uses. The site is bounded by Ellis Street to the north, Gough Street to the east with multi-family residential buildings beyond, multi-family residential buildings and the Sacred Heart Soccer Field to the south, and multi-family residential buildings to the west.

The proposed project would be limited to rehabilitation activities. Rehabilitation plans for the existing building include paved surface parking and perimeter landscaping, replacement of existing building systems and components including windows and the addition of sprinklers in residential units. No new construction is proposed as part of the project. Figure 1 illustrates the general location of the project site in the region and Figure 2 shows the location of the project site in the community. Figures are provided in Appendix A.

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.35(a)(3)(ii): Rehabilitation of buildings and improvements when the following conditions are met, in the case of multifamily residential buildings: (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.

This project will not change the unit density of the current residence, nor will it involve any change in land use. The highest estimated cost of rehabilitation, when including contingencies, is \$9,147,000. The estimated cost of replacement after rehabilitation is \$34,500,000. This renders the cost of rehabilitation ~27% of the total estimated cost of replacement after rehabilitation and well under the 75% threshold.

Funding Information

Grant Number	HUD Program	Funding Amount
B-24-MC-06-0016	CDBG	\$8,880,119.84
B-23-MC-06-0016	CDBG	\$3,393,880.16

Estimated Total HUD Funded Amount:

\$12,274,000

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

\$50,263,000

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"/>	<p>The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. In fact, the entire City and County of San Francisco does not come within 15,000 of the nearest airport, military or civilian,</p> <p>The nearest airports to the project site are the San Francisco International Airport (SFO) and the San Francisco Bay Oakland International Airport (OAK). The project site is located approximately approximately~59,052 feet from SFO and ~61,624 feet from OAK.</p> <p>Given the distance between the project site and the airports, the site is not located in a runway safety/protection zone and does not fall within the 15,000 ft threshold for further examination under this section.</p> <p>In summation, the project complies with Airport Hazard requirements under 24 CFR Part 51 Subpart D.</p> <p><i>Sources: (a),(b),(c); Appendix A (Figure 1), Appendix B (Figure 1-1, 1-2, 1-3, 1-4, 1-5, 1-6)</i></p>
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"/>	<p>There are no coastal barrier resources on the west coast of the United States and as such, the proposed project would not be located on or near a coastal barrier resource.</p> <p><i>Source: (d) Appendix B (Figure 3-1, 3-1, 3-3, 3-4))</i></p>
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"/>	<p>The project site is located on Flood Insurance Rate Map (FIRM) 0602980116A. FEMA designates the project site as Flood Zone X, which is not designated as a Special Flood Hazard Area. Zone X is not a FEMA-designated Special Flood Hazard Area, and flood insurance is not federally required for this zone. As such, the project is in compliance with flood insurance requirements.</p>

Source: (e), Appendix B (Figure 2-1, 2-2)

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>San Francisco County is currently in nonattainment for criteria pollutants PM_{2.5} (moderate) and 8-hour ozone (marginal). The proposed project activities would be limited to acquisition and rehabilitation activities and would not involve new construction or changes to the use or operation of existing development on the project site. Therefore, the project would not contribute to the release of criteria pollutants beyond those associated with the existing conditions.</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>Asbestos-Containing Materials</p> <p>The building was constructed in 1968, prior to the 1978 federal bans on friable asbestos-containing building materials and lead-containing paints became effective. As such, the Project Sponsor requested a limited asbestos and lead survey, which was conducted by Essel Environmental on August 6, 2024.</p> <p>Testing for presence of asbestos was completed and based on the sample results, the planned renovation projects will most likely impact Asbestos Containing Materials (ACM). As such, mitigation measures will be taken to comply with federal guidelines.</p> <p>Source: (f), Appendix C</p>
<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</p>

		<p>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><i>Source (g), (h) Appendix B (Figure 3-4)</i></p>
<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>Radon</p> <p>Radon is a naturally occurring, odorless, and invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings. The EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three radon zones, with Zone 1 being those areas with the average predicted indoor radon concentration in residential dwellings exceeding the EPA Action Limit of 4.0 pCi/L. It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends site specific testing in order to determine radon levels at a specific location.</p> <p>However, the map does give a valuable indication of the propensity of radon gas accumulation in structures. In accordance with CPD-23-103: Departmental Policy for Addressing Radon in the Environmental Review Process, issued on January 11, 2024, radon must be considered in the contamination analysis for 24 CFR Parts 50 or 58, as applicable.</p> <p>Available science-based information was used to determine whether the project site is located in an area that has average documented radon levels at or above 4.0 pCi/L that require mitigation. According to radon testing results</p>

from private labs available for San Francisco County through the CDC's National Environmental Public Health Tracking Network, the mean pre-mitigation radon level in tested buildings over the latest 10-year period from 2008 to 2017 is 1 pCi/L.

As mentioned above, measured indoor air concentrations of radon are compared to the EPA action level of 4 pCi/L to determine if mitigation should be performed. The EPA *suggests* mitigation be *considered* if a test shows between 2 and 4 pCi/L. In San Francisco County, the relevant radon level is 1 pCi/L. This is below the EPA (mandated) *action level* of 4.0 pCi/L and below even the EPA *suggested* mitigation level of 2 pCi/L.

Therefore, based on CPD-23-103, mitigation for Radon is not required.

Hazardous Materials Regulatory Oversight

Sites known to contain hazardous soils or groundwater conditions in San Francisco are governed by San Francisco Health Code Article 22A, also known as the Maher Ordinance, which is administered by the San Francisco Department of Public Health (SFDPH). The Maher Ordinance requires that SFDPH provide, “oversight for characterization and mitigation of hazardous substances in soil and groundwater in designated areas zoned for industrial uses, sites with industrial uses or underground storage tanks, sites with historic bay fill, sites in close proximity to freeways or underground storage tanks.” The site is not currently located in a mapped Maher Area.

2024 Path Forward Phase I ESA Summary

Path Forward Partners, Inc., (Path Forward) conducted a Phase I Environmental Site Assessment (ESA) of the project site in October 2024. The Phase I ESA is included as Appendix B See: (1) and is summarized as follows:

The ESA revealed one (1) Recognized Environmental Condition (REC) at the project site. The REC is as follows:

		<ul style="list-style-type: none"> The presence of apparent hydraulic oil in uncapped historical conduit in three elevator rooms. <p>No other RECs, including Historical Recognized Environmental Conditions (HRECs) nor Controlled Recognized Environmental Conditions (CRECs), were found in connection with the proposed project.</p> <p>Mitigation Measures</p> <p>Based on these findings identified in the Phase I ESA, Path Forward recommended addressing the uncapped, unused conduit associated to the historical elevator infrastructure. As such, included in this review’s section on mitigation measures is the capping of the conduits. Specifically, the hydraulic oil shall be cleaned and the conduit capped as part of rehabilitation activities, as recommended by the Phase I ESA.</p> <p><i>Sources: (k) Appendix B (Figure 4), Appendix D</i></p>
<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 site is located in a densely populated and urbanized area in San Francisco. The site is surrounded by an urban environment and generally lacks existing vegetation other than urban landscaping. Implementation of the proposed project would involve rehabilitation of the existing structure. There are no endangered species, or species subject to the Endangered Species Act, occupying or migrating through the site. As identified by the U.S Fish and Wildlife Service’s Environmental Conservation Online System tool, there is no critical habitat located on the project site. Further, the project site is located 1.40-miles northeast from the nearest critical habitat area, which is habitat for the Franciscan manzanita (<i>Arctostaphylos franciscan</i>). In addition, no grading, fill or new construction is proposed. Therefore, the proposed action would have no effect on natural habitats or federally protected species and would be consistent with the Endangered Species Act.</p> <p><i>Source (a, o) Appendix B (Figure 5-1, 5-2)</i></p>
<p>Explosive and Flammable Hazards</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,</p>

24 CFR Part 51 Subpart C		<p>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><i>Sources: (l, m, n)</i></p>
<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 Department of Conservation classifies the project site as Urban and Built-up Land, and there are no nearby agricultural lands or farmlands. Further, TIGERweb identifies this site and surroundings as an urban area. Therefore, the proposed project would have no effect on farmlands.</p> <p><i>Source: (p) Appendix B (Figure 6, 10-1, 10-2)</i></p>
<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>The project site is located on Flood Insurance Rate Map (FIRM) 0602980116A. FEMA designates the project site as Flood Zone X. According to the flood map, the site is in an area of minimal flood hazard outside of the 0.2 percent annual chance floodplain. Figure 7 in Appendix A shows that the project site is not within a Special Flood Hazard Area. In addition, no grading, fill or new construction is proposed. Therefore, implementation of the project would not increase flood hazards on neighboring properties or otherwise adversely affect floodplain management.</p> <p><i>Sources: (a, e), Appendix B (Figure 2-1,2-2)</i></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 type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The existing building on the project site was constructed in 1968 and is more than 50 years old. As such, it is eligible for consideration on the National Register of Historic Places (NRHP) and 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 (the "PA").</p> <p>The San Francisco Mayor's Office of Housing and Community Development has reviewed the project under the 2007 Programmatic Agreement and determined that the</p>

		<p>undertaking is exempt from review by the SHPO or ACHP per Stipulations V.A, V.B, IV.A, and XI.A.</p> <p>This project is comprised entirely of rehabilitation activities. Per Section IV.A of the PA, the Area of Potential Effects (“APE”) shall be limited to the legal lot lines of a property when the Undertaking consists exclusively of rehabilitating a property’s interior or exterior features.</p> <p>All the activities which comprise this project are exempt from further review under Section IV(C) Appendix A. Please see the table included in Appendix E.</p> <p>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, Part 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.</p> <p><i>Sources: (n), (m), Appendix E</i></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 involves the rehabilitation of an existing residential property and would not change the existing operations of the project site. Project activities would not increase ambient noise levels within the project site and the surrounding area.</p> <p>In addition, no grading or new construction is proposed. The project would not create new noise sources and would have no noise impacts under HUD guidelines.</p> <p>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><i>Sources: The Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</i></p>

<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>There are no sole source aquifers in San Francisco County. The nearest sole source aquifer is the Santa Margarita Aquifer, located over 50 miles south of the site. Therefore, the project site is not located in an area supported by a sole source aquifer.</p> <p><i>Source: (a, v) Appendix B (Figure 7)</i></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>According to the U.S. Fish and Wildlife Service's Wetlands Online Mapper, no wetlands are located on or adjacent to the project site. In addition, no grading, fill or new construction is proposed.</p> <p><i>Sources: (a, o) Appendix B (Figure 8)</i></p>
<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>According to the Wild and Scenic Rivers System, there are no wild or scenic rivers in San Francisco County. The closest designated wild and scenic river is the Lower American River, which is located approximately 75 miles northeast of the project site. Therefore, the proposed project would have no impact on wild or scenic rivers.</p> <p><i>Source: (w) Appendix B (Figure 9-1, 9-2)</i></p>
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the EPA's Environmental Justice screen tool, the project's surrounding area's demographics include 57 percent minority and 28 percent low-income populations. The existing development on the project site (Normandy Apartments) currently serves very low-income and low-income residents.</p> <p>This project does not violate Executive Order 12898 because there are no impacts that will disproportionately affect low income or minority populations. This project is largely for the purpose of remediating some potentially adverse conditions experienced by the current residents of the building, i.e. replacing and improving an outdated fire alarm/sprinkler system, doing asbestos removal and ADA modifications.</p> <p>Additionally, San Francisco as a whole has a uniquely and profoundly acute need for affordable housing right now, particularly</p>

		<p>among very low-income residents. Affordable housing is a dire necessity among our most vulnerable populations.</p> <p><i>Sources: (y), Appendix F</i></p>
<p>Other Factors: Relocation</p> <p>49 CFR Part 24 - Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended "Part 24" – “URA”</p> <p>Section 104(d) of the Housing and Community Development Act</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Phased relocation of 40 days per unit is planned to provide for the upgrade of electrical subpanels servicing each unit and installation of sprinklers in every unit and will include asbestos remediation in the ceiling along the sprinkler tracks.</p> <p>The current blueprint for the relocation plan is one with four phases, a smaller first phase to minimize relocation to offsite units while vacancies accrue over time followed by three full phases of 28 units. The relocation plan will rely on the 11 unoccupied units and at least 9 off-site units to allow the in-unit sprinkler and electrical work to be completed safely because there is targeted asbestos abatement necessary in the ceiling along the sprinkler path. The project sponsor estimates that each of the 97 current households would need to relocate for a period of 40 days.</p> <p>Tenderloin Neighborhood Development Corporation (TNDC), the project sponsor, has already begun tenant outreach with a resident meeting on 12/18/2024. TNDC plans to engage with the existing residents in the following ways:</p> <ul style="list-style-type: none"> • In-person resident meetings; initial kick-off meeting and subsequent meetings prior to acquisition and leading up to the rehabilitation. • In-person consultations between project sponsor staff and specific residents/households; will be held at 3401 Geary pre-acquisition and on-site at Normandy Apartments post-acquisition • Mailings for pertinent notices and information related to upcoming meetings • Email; TNDC has a specific email inbox for Normandy residents that will be monitored by 5 staff members on a daily basis; responses will be handled no later than 48 hours

		<i>Sources: 49 CFR Part 24 - Uniform Relocation and Real Property Acquisition Policies Act of 1970 and Section 104(d) of the Housing and Community Development Act</i>
--	--	--

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

- a. Environmental Protection Agency. 2024. NEPAassist. (accessed September 2024).
- b. County of, San Mateo. 2012. SFO ALUCP Airport Influence Areas. <https://ccag.ca.gov/wp-content/uploads/2024/02/5A5a-SFO-Comment-Ltr-Tanforan-attachments.pdf>. (Accessed September 2024)
- c. Alameda County Government. 2010. Oakland International Airport Land Use Compatibility Plan. https://www.acgov.org/cda/planning/generalplans/documents/OAKCh3_Oakland_International_Airport_Policies.pdf (Accessed September 2024)
- d. United States Fish and Wildlife Service. 2023. Coastal Barrier Resources System Mapper. <https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/> (accessed July 2023).
- e. Federal Emergency Management Agency (FEMA). 2021. FIRM Flood Insurance Rate Map: San Francisco, City and County of. Effective March 23, 2021. <https://msc.fema.gov/portal/search?AddressQuery=1155%20Ellis%20Street%2C%20San%20Francisco%2C%20CA> (accessed September 2024).
- f. United States Environmental Protection Agency. 2023. Current Nonattainment Counties for All Criteria Pollutants. <https://www3.epa.gov/airquality/greenbook/ancl.html> (accessed September 2024).
- g. Bay Area Air Quality Management District Regulation 11, Rule 2, The Bay Area Air Quality Management District. [Bay Area Air Quality Management District Regulation 11, Rule 2](#)
- h. San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Adopted 1968. Reprinted in May 2020 <https://bcddc.ca.gov/wp-content/uploads/sites/354/2023/09/bayplan.pdf>.
- i. United States National Oceanic and Atmospheric Administration. State Coastal Zone Boundaries, California. <http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf>
- j. San Francisco Property Information Map: <https://sfplanninggis.org/PIM/?tab=Property&search=1155+ELLIS+ST>
- k. Center for Disease Control and Prevention (CDC). 2024. Radon Tests from States. <https://ephtracking.cdc.gov/indicatorPages?selectedContentAreaAbbreviation=31&selectedIndicatorId=141&selectedMeasureId=> (Accessed September 2024)
- l. United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51
- m. San Francisco Department of Public Health List of Above Ground Storage Tanks in San Francisco
- n. 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.
- o. United States Fish and Wildlife Service. 2023. Environmental Conservation Online System (ECOS). Critical Habitat for Threatened & Endangered Species: http://www.arcgis.com/home/webmap/viewer.html?url=http://services.arcgis.com/QVENGdaPbd4LUkLV/ArcGIS/rest/services/USFWS_Critical_Habitat/FeatureServer/1&source=sd. (accessed July 2023).

- p. California Environmental Protection Agency. 2024. CalEPA Regulated Site Portal. <https://siteportal.calepa.ca.gov/nsite/map/results> (accessed September 2024).
- q. United States Advisory Council on Historic Preservation. 36 CFR Part 800 Protection of Historic Properties.
- r. California Department of Conservation. 2022. California Important Farmland Finder. <https://maps.conservation.ca.gov/agriculture/> (accessed September 2024).
- s. 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; archives.hud.gov/offices/cpd/environment/section106/pdf/ca_sanfrancisco_2006.pdf
- t. United States Department of Housing and Urban Development: The Noise Guidebook Environmental Planning Division, Office of Environment and Energy. September 1900.
- u. United States Department of Housing and Urban Development Environmental Criteria and Standards. 24 CFR Part 51
- v. United States Environmental Protection Agency. 2023. Sole Source Aquifers. <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b> (accessed September 2024).
- w. USFWS. 2024. National Wetlands Inventory. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/> (Accessed September 2024)
- x. National Wild and Scenic Rivers System. 2023. "California". <https://www.rivers.gov/california.php> (accessed September 2024).
- y. United States Environmental Protection Agency. 2024. EJ Screen. <https://ejscreen.epa.gov/mapper/> (accessed September 2024).
- z. United States Census Bureau. 2024. TIGERweb. https://tigerweb.geo.census.gov/tigerwebmain/TIGERweb_main.html (Accessed September 2024)
- aa. 49 CFR Part 24 - Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended "Part 24"
- bb. Section 104(d) of the Housing and Community Development Act

Appendices

Appendix A – Project Information

Appendix B – Compliance Documentation

Appendix C – Essel Environmental - Limited Asbestos and Lead Survey

Appendix D – Path Forward Partners - Phase I Environmental Site Assessment (ESA)

Appendix E – Project-Based Exemptions Under Appendix A of the Programmatic Agreement

Appendix F – EPA Environmental Justice Screening Tool & American Community Survey (ACS) Report

Field Inspection (Date and completed by): A field survey of the project site was completed on September 27, 2024, by JulieAnn Murphy of Rincon Consultants, Inc.

Summary of Findings and Conclusions: There are no environmental conditions which cannot be adequately remediated by mitigation measures.

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
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>This project includes remediation work to remove all asbestos-containing materials (ACM) during the course of installation/upgrade of fire sprinkler work, therefore without question ACM will be disturbed during the project. The exposure to ACM is largely limited by the relocation measures (discussed below) but further measures to ensure limited exposure will be taken.</p> <p>All work shall be performed by licensed asbestos abatement contractors working under the TNDC asbestos program requirements.</p> <p>The final scope of work shall be reviewed against the asbestos survey information and the removal of asbestos materials shall comply with the National Emissions Standards for Hazardous Air Pollutants and the Bay Area Air Quality Management District Regulation 11, Rule 2.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Based on these findings identified in the Phase I ESA, Path Forward recommended addressing the uncapped, unused conduit associated to the historical elevator infrastructure. Specifically, the hydraulic oil shall be cleaned and the conduit capped as part of rehabilitation activities.</p>
<p>Other Factors: Relocation</p> <p>49 CFR Part 24 - Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended "Part 24" – "URA"</p> <p>Section 104(d) of the Housing and Community Development Act</p>	<p>This project involves the temporary relocation of residents during the rehabilitation of the building. As such, relocation plan is required pursuant to Section 104(d) of the Housing and Community Development Act of 1974 and in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended), during the course of this project.</p> <p>The project sponsor will prepare a Relocation Assistance Plan (RAP), or Equivalent Plan, that will comply with the requirements of RAP-equivalent documents and applicable regulations.</p>

	The Sponsor will submit said relocation plan, which must be compliant with all Federal law, to MOHCD for review and approval prior MOHCD issuing a Notice of Proceed (NTP) to begin the rehabilitation.
--	---

Determination:

- This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5. **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 because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. 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 now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: *Madeleine Sweet* Date: 12/17/2024

Name/Title/Organization: Madeleine Sweet, Compliance Coordinator, MOHCD

Responsible Entity Agency Official Signature:

 Date: 12/17/2024
Brian Cheu (Dec 17, 2024 11:25 PST)

Name/Title: Brian Cheu, Director of 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).

The Normandy Apts - 1155 Ellis St - FINAL

Final Audit Report

2024-12-17

Created:	2024-12-17
By:	madeleine.sweet@sfgov.org madeleine.sweet@sfgov.org (madeleine.sweet@sfgov.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAsWjQzIGLw22P2gF9cz-_u8xBo7RuL2MJ

"The Normandy Apts - 1155 Ellis St - FINAL" History

-  Document created by madeleine.sweet@sfgov.org madeleine.sweet@sfgov.org (madeleine.sweet@sfgov.org)
2024-12-17 - 7:22:14 PM GMT
-  Document emailed to Brian Cheu (brian.cheu@sfgov.org) for signature
2024-12-17 - 7:22:46 PM GMT
-  Email viewed by Brian Cheu (brian.cheu@sfgov.org)
2024-12-17 - 7:25:11 PM GMT
-  Document e-signed by Brian Cheu (brian.cheu@sfgov.org)
Signature Date: 2024-12-17 - 7:25:35 PM GMT - Time Source: server
-  Agreement completed.
2024-12-17 - 7:25:35 PM GMT