



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

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Washington, DC 20410  
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## **Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5**

**Pursuant to 24 CFR 58.35(a)**

### **Project Information**

**Project Name:** Home Modifications for Seniors and Persons with Disabilities

**Responsible Entity:** San Francisco Mayor's Office of Housing and Community Development (MOHCD)

**Grant Recipient** (if different than Responsible Entity): n/a

**State/Local Identifier:**

**Preparer:** Madeleine Sweet, Compliance Coordinator

**Certifying Officer Name and Title:** Gloria Woo, Director of Data, Evaluation, and Compliance (MOHCD)

**Consultant** (if applicable):

**Direct Comments to:**

Madeleine Sweet  
Compliance Coordinator  
SF MOHCD  
628-652-5983  
[madeleine.sweet@sfgov.org](mailto:madeleine.sweet@sfgov.org)

**Project Location:**

**Description of the Proposed Project** [24 CFR 50.21 & 58.32]: Rebuilding Together San Francisco is an organization which provides home repairs and modifications for seniors and adults with disabilities across the entire City and County of San Francisco.

**Level of Environmental Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

- 24 CFR 58.35(a)(2) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons.
- 24 CFR 58.35(a)(3)(i) Rehabilitation of buildings and improvements when the following conditions are met: In the case of a building for residential use (with one to four units), the density is not increased beyond four units, and the land use is not changed

## **Funding Information**

Grant Number	HUD Program	Funding Amount
B-25-MC-06-0016	25-26 CDBG Entitlement	\$483,612

**Estimated Total HUD Funded Amount:** \$483,612

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$483,612

## **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"/>	<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, Giving the most generous boundaries to SFO and using the county line closest to the airport, the distance is 26,821ft. As such, the project is in compliance with Airport Hazards requirements.</p> <p>Sources:</p> <ol style="list-style-type: none"><li>County of, San Mateo. 2012. SFO ALUCP Airport Influence Areas. <a href="https://ccag.ca.gov/wp-content/uploads/2024/02/5A5a-SFO-Comment-Ltr-Tanforan-attachments.pdf">https://ccag.ca.gov/wp-content/uploads/2024/02/5A5a-SFO-Comment-Ltr-Tanforan-attachments.pdf</a>. (Accessed September 2024)</li></ol>

		<p>2. Alameda County Government. 2010. Oakland International Airport Land Use Compatibility Plan.  <a href="https://www.acgov.org/cda/planning/generalplans/documents/OAKCh3_Oakland_International_Airport_Policies.pdf">https://www.acgov.org/cda/planning/generalplans/documents/OAKCh3_Oakland_International_Airport_Policies.pdf</a>  (Accessed September 2024)</p>
<p><b>Coastal Barrier Resources</b></p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<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>The project is not located in a coastal barrier resource area.</p> <p><i>Source Documents:</i></p> <ol style="list-style-type: none"> <li>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.</li> <li>United States Fish and Wildlife Service. 2023. Coastal Barrier Resources System Mapper.  <a href="https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/">https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/</a> (accessed July 2023).</li> </ol>
<p><b>Flood Insurance</b></p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Since the project site will be unknown until the project sponsor begins to take applications for conducting these free repairs, there is no way to assess whether or not the project site is located within a NFHL zone. Furthermore, HUD policy states that flood insurance is not required for a federal project consisting of minor repairs if all aggregated repairs cost less than the National Flood Insurance Program's maximum deductible of \$10,000. Thus, so long as all of the individual projects remain below \$10,000, this is exempt from Flood Insurance.</p> <p><i>Sources:</i></p> <ol style="list-style-type: none"> <li>Federal Emergency Management Agency (FEMA). 2021. FIRM Flood Insurance Rate Map: San Francisco, City and County of. Effective March 23, 2021.</li> </ol>

		<a href="https://msc.fema.gov/portal/search?AddressQuery">https://msc.fema.gov/portal/search?AddressQuery</a> (accessed September 2024).
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>San Francisco County is currently in nonattainment for criteria pollutants PM2.5 (moderate) and 8-hour ozone (marginal). The proposed project activities would be limited to minor rehabilitation activities and would not involve new construction or changes to the use or operation of existing development on any given 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>Sources:</p> <ol style="list-style-type: none"> <li>1. United States Environmental Protection Agency. 2023. Current Nonattainment Counties for All Criteria Pollutants. <a href="https://www3.epa.gov/airquality/greenbook/ancl.html">https://www3.epa.gov/airquality/greenbook/ancl.html</a> (accessed September 2024).</li> <li>2. Bay Area Air Quality Management District Regulation 11, Rule 2, The Bay Area Air Quality Management District. <a href="#">Bay Area Air Quality Management District Regulation 11, Rule 2</a></li> </ol>
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<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>Sources:</i></p> <ol style="list-style-type: none"> <li>1. San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Adopted 1968. Reprinted in May 2020 <a href="https://bcdc.ca.gov/wp-content/uploads/sites/354/2023/09/bayplan.pdf">https://bcdc.ca.gov/wp-content/uploads/sites/354/2023/09/bayplan.pdf</a>.</li> <li>2. United States National Oceanic and Atmospheric Administration. State Coastal Zone Boundaries, California. <a href="http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf">http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf</a></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 type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p><b>Radon</b></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 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.</p> <p>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 <i>suggests</i> mitigation be <i>considered</i> 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) <i>action level</i> of 4.0 pCi/L and below even the EPA <i>suggested</i> mitigation level of 2 pCi/L.</p> <p>Therefore, based on CPD-23-103, mitigation for Radon is not required.</p> <p><b><i>Hazardous Materials Regulatory Oversight</i></b></p> <p>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." If any sites are found to be located in a</p>
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		<p>Maier site, there will be additional measures taken.</p> <ol style="list-style-type: none"> <li>1. Center for Disease Control and Prevention (CDC). 2024. Radon Tests from States. <a href="https://ephtracking.cdc.gov/indicatorPages?selectedContentAreaAbbreviation=31&amp;selectedIndicatorId=141&amp;selectedMeasureId=">https://ephtracking.cdc.gov/indicatorPages?selectedContentAreaAbbreviation=31&amp;selectedIndicatorId=141&amp;selectedMeasureId=</a> (Accessed March 2025)</li> <li>2. Center for Disease Control and Prevention (CDC). 2024. Radon Tests from States. <a href="https://ephtracking.cdc.gov/indicatorPages?selectedContentAreaAbbreviation=31&amp;selectedIndicatorId=141&amp;selectedMeasureId=">https://ephtracking.cdc.gov/indicatorPages?selectedContentAreaAbbreviation=31&amp;selectedIndicatorId=141&amp;selectedMeasureId=</a> (Accessed March 2025)</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>This project will have No Effect on listed species due to the nature of the activities involved in the project. According to the published HUD guidance on this factor: "A No Effect determination can be made if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: [...] completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings. " This project is extremely limited in scope, as it is entirely composed of small-scale rehab and renovation activities. All of these types of activities are considered to have no potential to affect endangered species. Nonetheless, an evaluation of the immediate vicinity of project location with regards to endangered species has been performed and is attached as documentation. Due to the nature of this project, it is of the kind which is de-facto in compliance with the Endangered Species Act.</p> <p>Sources:</p> <ol style="list-style-type: none"> <li>1. "Endangered Species", HUD Exchange. (<a href="https://www.hudexchange.info/environmental-review/endangered-species/">https://www.hudexchange.info/environmental-review/endangered-species/</a>) Accessed March 2025</li> </ol>

		2. United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project will not result in an increased number of people being exposed to hazardous operations by increasing residential densities, converting the type of use of a building to habitation or making a vacant building habitable. The project does not involve explosive or flammable materials or operations.</p> <p><i>Sources:</i></p> <ol style="list-style-type: none"> <li>1. United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51</li> <li>2. San Francisco Department of Public Health List of Above Ground Storage Tanks in San Francisco</li> <li>3. United States Department of Housing and Urban Development. Siting of HUD-Assisted Projects Near Hazardous Facilities: Acceptable Separation Distances from Explosive and Flammable Hazards. Office of Community Planning and Development, Office of Environment and Energy. Washington, CD September 1996.</li> </ol>
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The 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>Sources:</i></p> <ol style="list-style-type: none"> <li>1. California Environmental Protection Agency. 2024. CalEPA Regulated Site Portal.  <a href="https://siteportal.calepa.ca.gov/nsite/map/results">https://siteportal.calepa.ca.gov/nsite/map/results</a> (accessed March 2025).</li> </ol>
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>This project is exempt from further scrutiny due to the regulations listed under 24 CFR 55.12 which exempt this project from further action to obtain compliance with HUD's floodplain management regulations in Part 55. The applicable citation is listed at 24 CFR 55.12</p>



		<p>which describes “Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities”.</p> <p>This program’s description is as follows: “[the project sponsor] is an organization which provides home repairs and modifications for seniors and adults with disabilities across the entire City and County of San Francisco.”</p> <p>As such, the project is in compliance.</p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Due to the fact that at this juncture, and by the nature of the project itself, it is an impossibility to know the exact project sites that will be the places in which the repairs will take place. As such, for the purposes of this review, in being prudent, this analysis maintains the assumption that <i>at least one of the properties</i> is over 50 years old.</p> <p>As such, said property would be 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>Any such undertakings would be exempt from review by the SHPO or ACHP per Stipulations V.A, V.B, IV.A, and XI.A.</p> <p>Any repair undertaken by this project sponsor is considered automatically to be comprised entirely of minor renovation/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 as an attachment to this document.</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 &amp; Reconstructing Historic Buildings, 1995.</p> <p><i>Sources:</i></p> <p>3. United States Advisory Council on Historic Preservation. 36 CFR Part 800 Protection of Historic Properties.</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</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The projects undertaken within this greater project involve conducting repairs to 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>Most project sites within SF do 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:</i></p> <p>1. The Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</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</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The project consists of activities that are unlikely to have an adverse impact on groundwater resources as it is extremely narrow in scope and consists solely of minor repairs of existing buildings/residences. Only for new construction and conversion activities does the sole source aquifer (SSA) authority apply. As such, this project includes no activities that</p>

		<p>would warrant further evaluation under the SSA authority and thus is in compliance with Sole Source Aquifer requirements.</p> <p>Furthermore, 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 city. Therefore, the project site is not located in an area supported by a sole source aquifer.</p> <p>Source:</p> <ol style="list-style-type: none"> <li>1. "Sole Source Aquifers – Proximity to SF" PDF. Created January 31, 2025. Created with: (See: pg. 14)  <a href="https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b">https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b</a></li> </ol>
<p><b>Wetlands Protection</b></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>This project does not involve new construction as defined in Executive Order 11990. This project does not include any draining, dredging, channelizing, filling, diking, impounding, and related activities or any structures or facilities begun or authorized after the effective date of the Order.</p> <p>Furthermore, the project does not include the expansion of a building's footprint, nor ground disturbance.</p> <p>As such, it is in compliance with the Wetlands Protection Act.</p>
<p><b>Wild and Scenic Rivers</b></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>

**Field Inspection** (Date and completed by): **N/A**

**Summary of Findings and Conclusions:** **N/A**

### **Mitigation Measures and Conditions**

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
n/a	

### **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:  Date: 3/17/2025

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

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Responsible Entity Agency Official Signature:

 Date: 3/17/2025  
Gloria Woo (Mar 18, 2025 13:50 PDT)

Name/Title: Gloria Woo, Director of Data, Evaluation, and Compliance

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).



Find address or place



## Measurement



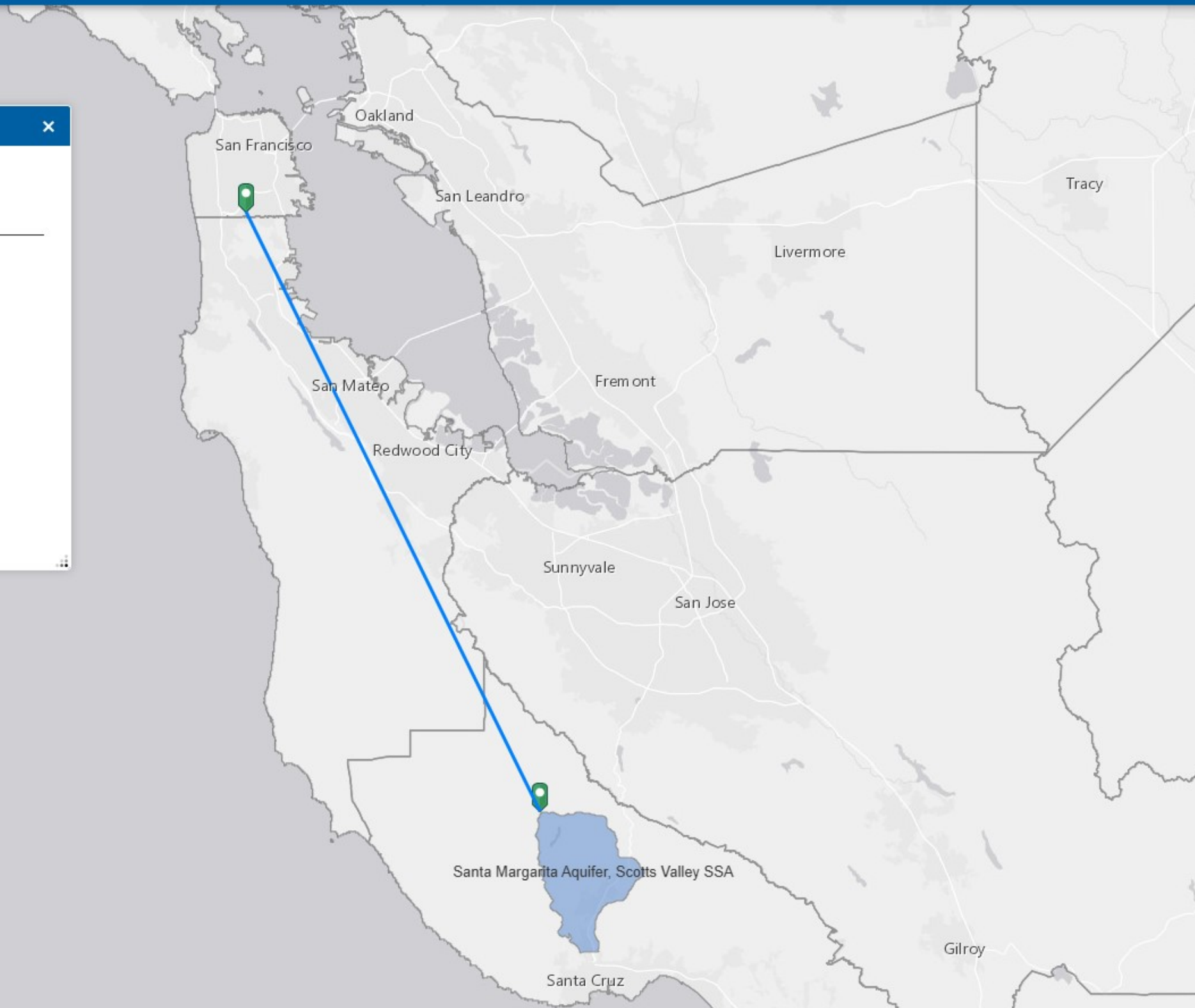
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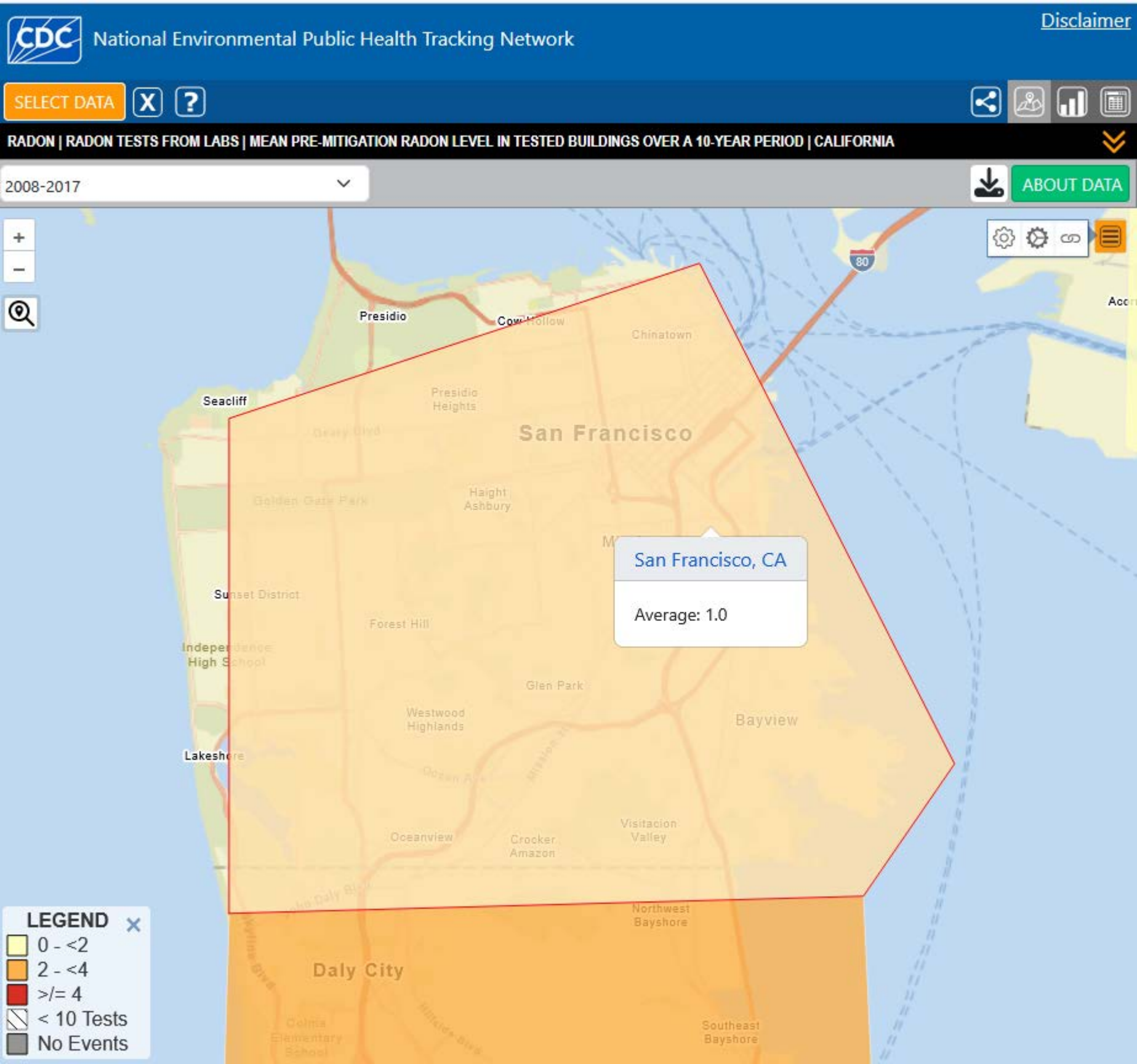
Measurement Result

44.4 Miles

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# Rebuilding San Francisco Project

## Historical Preservation Checklist

VI. AREA OF POTENTIAL EFFECTS
A. The Area of Potential Effects (“APE”) for Undertakings covered by this PA 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.

IV. UNDERTAKINGS NOT REQUIRING REVIEW BY THE SHPO OR THE ACHP
The following Undertakings do not require review by SHPO or ACHP and no signatory is required by this PA to determine the National Register of Historic Places ("NRHP") eligibility of properties affected by these Undertakings.
A. N/A
B. N/A
C. Undertakings limited exclusively to the activities listed in Appendix “A” of this PA. Undertakings not so limited shall be reviewed pursuant to this PA. 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.

APPENDIX A
The following Undertakings require only administrative review by the CITY and not the SHPO or the ACHP pursuant to Stipulation IV of this PA.
EXEMPTION
1. Demolition and rehabilitation of facilities that are not Historic Properties, except when a proposed addition of such facilities may affect a surrounding or adjacent historic district;
2. Repair, replacement and installation of the following systems provided that such work does not affect the exterior of a property or require new duct installation throughout the interior:
a. electrical work;
b. plumbing pipes and fixtures, including water heaters;
c. heating and air conditioning system improvements;
d. fire and smoke detector system installation;
e. sprinkler system installation;
f. ventilation system installation;
g. interior elevator or wheelchair conveying system; and
h. bathroom improvements where work is restricted to an existing bathroom.



3. Repair or partial replacement of porches, decks, cornices, exterior siding, doors, thresholds, balustrades, stairs, or other trim when the repair or replacement is done in-kind to closely match existing material and form;
4. Installation of new shelf space or improvement of such, and repair, replacement, and installation of cabinets, countertops, and appliances;
5. Repair or replacement of fencing, gates and freestanding exterior walls when work is done in-kind to match existing materials and form;
6. Repair, replacement or installation of windows and storm windows (exterior, interior, metal or wood) provided these match the shape, size and materials of the historic windows and provided that, for storm windows, the meeting rail coincides with that of the historic window. Color should match trim. If reproduction of damaged elements must be accomplished with new materials then any reproduction or replacement shall be in kind;
7. Installation of new window jambs, jamb liners, and screens;
8. Caulking, weather-stripping, reglazing and repainting of windows;
9. Roof repair or replacement of historic roofing with materials that closely match existing materials and forms. Cement asbestos shingles may be replaced with asphalt-based shingles;
10. Repair, replacement or installation of gutters and down spouts;
11. Repainting and refinishing of exterior or interior surfaces, including but not limited to walls, floors, and ceilings, provided that harmful surface preparation treatments including but not limited to water blasting, sandblasting, and chemical removal are not used and that work is done in-kind to match existing material and form;
12. Repair or replacement of awnings and signs when work is done in-kind to closely match the existing material and form;
13. Installation of insulation, with the exception of area formaldehyde foam insulation or any other thermal insulation with a water content into wall cavities, provided that decorative interior plaster or woodwork or exterior siding is not altered by this work item;
14. Installation or replacement of security devices, including dead bolts, door locks, window latches, security grilles, surveillance cameras and door peepholes, and electronic security systems;
15. Installation of grab bars, handrails, guardrails and minor interior and exterior modifications for disabled accessibility;
16. Modifications of and improvements to path of travel for persons with disabilities from, to and within a building, structure, playground, or park.
17. Repair or replacement of interior stairs when work is done in-kind to match existing material and form;
18. Replacement of non-significant flat stock trim
19. Repair or replacement of existing roads, driveways, sidewalks, curbs, curb ramps, speed bumps and gutters provided that work is done in-kind to closely match existing materials and forms and provided that there are only minimal changes in the dimensions and configurations of these features;
20. Repair, replacement and installation of the following, regardless of their location within or adjacent to an historic district:
a. Park furniture, including benches, picnic tables, chairs, planter boxes, barbecue pits and trellises.

b. Outdoor yard improvements, including play structure, matting, fencing, gates, playground lighting, drinking fountain, playground equipment, path of travel and ramps.
c. Landscaping, including tree planting, tree pruning, shrub removal, play court resurfacing or sodding, irrigation, murals and painting of game lines for school play yards and grounds.
21. Repair, replacement or installation of water, gas, storm, and sewer lines when the work qualifies as an exemption pursuant to Stipulation XI.B.
22. Acquisition of properties which is limited to the legal transfer of ownership with no physical improvements proposed;
23. Temporary bracing or shoring;
24. Anchoring of masonry walls to floor systems so long as anchors are embedded and concealed from exterior view such as in the HILTI systems;
25. Stabilization of foundations and addition of foundation bolts;
26. Rental and installation of scaffolding;
27. Installation of temporary, reversible barriers such as chain link fences and polyethylene sheeting or tarps;
28. Repair and replacement of any interior or exterior elements when the repair or replacement is done in-kind to closely match existing materials


# CEST Rebuilding SF

Final Audit Report

2025-03-18

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