



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

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

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**Broad-Level Tiered Environmental Review for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR Part 58.35(a)**

**Project Information**

**Project Name:** Countywide Housing Rehabilitation Programs (Programs)

**Responsible Entity (RE):** Sonoma County Community Development Commission (SCCDC)

**State/Local Identifier:** California/County of Sonoma

**RE Preparer:** LACO Associates, Inc. on behalf of RE

**Certifying Officer:** Dave Kiff, SCCDC Interim Executive Director

**Grant Recipient** (if different than Responsible Entity): Same as RE

**Point of Contact:** Marc Chandler, Community Development Manager  
Marc.Chandler@sonoma-county.org

**Consultant** (if applicable): LACO Associates, Inc.

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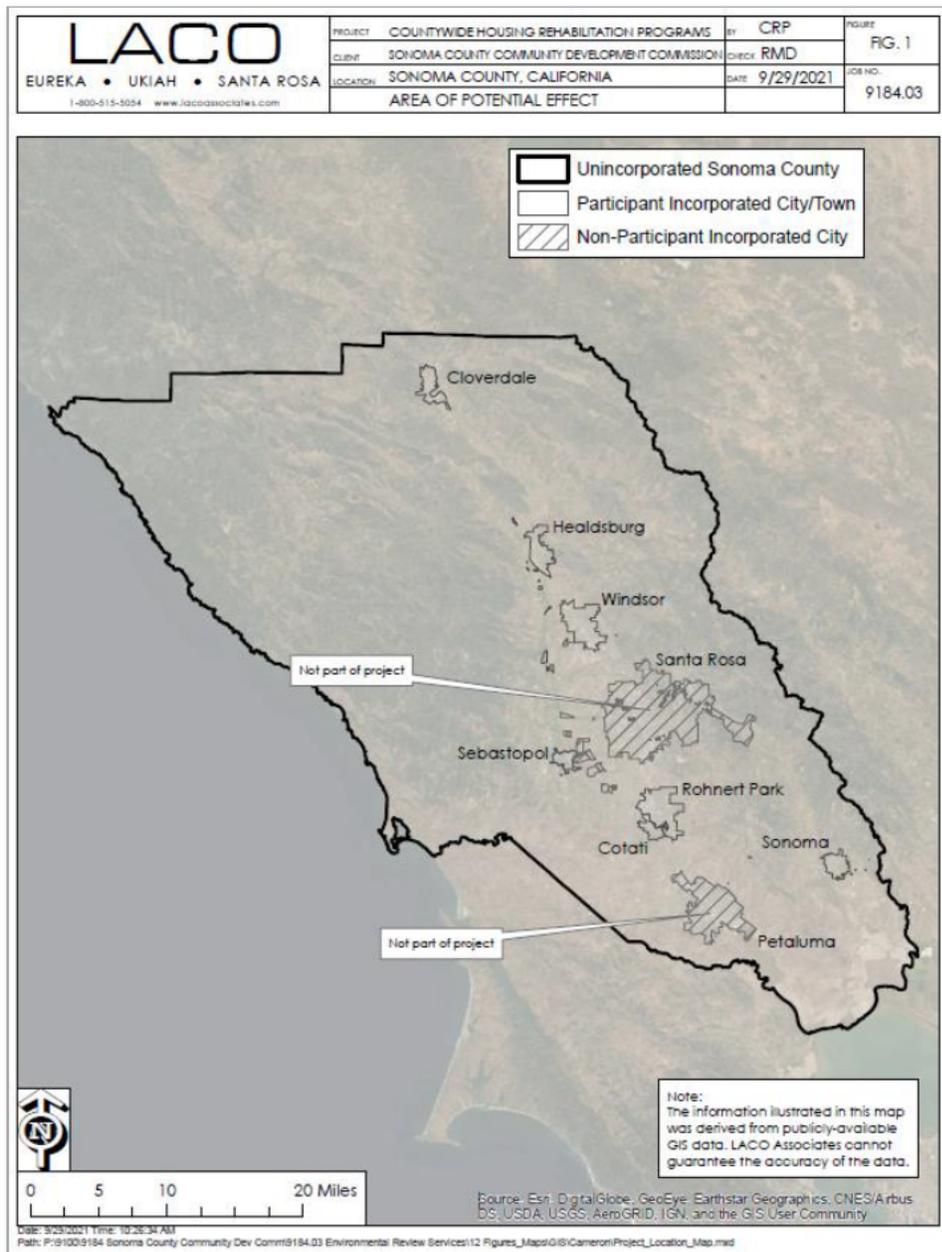
**Document Purpose:** This document presents Tier One of the Broad-Level Tiered Environmental Review has been prepared by the Sonoma County Community Development Commission (SCCDC) for the Countywide Housing Rehabilitation Programs (Programs), described below. This Tier One review identifies and evaluates only those issues that can be decided at this time and identifies the issues to be considered in site specific reviews.

**Project Location:** The Programs will be carried out in dispersed sites throughout the unincorporated areas of Sonoma County, California and incorporated areas of the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma, and the town of Windsor. See Figure 1 – Area of Potential Effect, below.

**Approximate size of the project area:** The project area of the Programs includes the entirety of Sonoma County, which is approximately 1,575 square miles in size. Specific project areas will be limited to the property where the unit receiving the funds is located and will be included with each Tier 2 site specific review (as described below).

**Additional Location Information:** There are no geographic restrictions on participation in the Programs. Project activities will be determined based on need and funding availability. Specific addresses will be assessed in the Tier 2 site specific reviews.

Figure 1 – Area of Potential Effect



**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:** The Programs include the Housing Rehabilitation Loan Program (HRLP), which supports health, safety, and code-related improvements to single-family dwellings, mobile homes, and individual units in multi-family structures occupied by low- and moderate-income households, and the Earthquake Resistant Bracing System (ERBS) Program, which supports the installation of Earthquake Resistant Bracing Systems on mobile homes. Additionally, some housing access modifications may be undertaken by the Disability Services and Legal Center. CDBG funds, reprogrammed funds from prior fiscal years and program income will be made available for these activities. The Programs will span Fiscal Years 2020-2021, 2021-2022, 2022-2023, 2023-2024, and 2024-2025. It is anticipated that up to 225 units will be renovated, expending upward to \$5 million during the time period. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each project location under this program when specific project locations become known.

**Length of time covered by this review:** Five (5) years, including fiscal years 2020-2021, 2021-2022, 2022-2023, 2023-2024, and 2024-2025.

**Maximum number of dwelling units or lots addressed by this tiered review:** There is no maximum number of dwelling units addressed by this tiered review. The number of dwelling units is limited by funding availability and qualifying applicants.

**Level of Environmental Review Determination:**

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

(3) *Rehabilitation of buildings and improvements when the following conditions are met:*

(i) *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.*

(ii) *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.*

**Funding Information**

Grant Number	HUD Program	Funding Amount
FY 20-21: B-20-UC-06-0008	Community Development Block Grant (CDBG) Program	FY 20-21: 364,030
FY 21-22: B-21-UC-06-0008		Estimated \$5,000,000
FY 22-23: B-22-UC-06-0008		total
FY 23-24: B-23-UC-06-0008		
FY 24-25: B-24-UC-06-0008		

**Estimated Total HUD Funded Amount:** CDBG funds, reprogrammed funds from prior fiscal years and program income will be made available for these activities. It is anticipated that up to 225 units will be renovated, expending upward to \$5,000,000.00 during the time period.

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$5,000,000

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities and Written Strategies**

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6</p>	<p>Was compliance achieved at the broad level of review?</p>	<p><b>If Yes:</b> Describe compliance determinations made at the broad level. <b>If No:</b> Describe the policy, standard, or process to be followed in the site-specific review.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</b></p>		
<p><b>Airport Hazards</b>  24 CFR Part 51 Subpart D</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>Due to the nature of this project, <u>compliance cannot be determined</u> for this factor at the Broad (Tier 1) Level. The project area (Sonoma County) includes civilian airports and does not include military airports. When project location and site specific activities have been determined, an analysis will be completed to ensure compliance with this factor. All documentation will be included in the Tier 2 site specific review, to be completed in accordance with the Tier 2 strategy and checklist.  Source Documentation: - Tier 2 strategy and checklist (Appendix C)</p>
<p><b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes    No <input checked="" type="checkbox"/>   <input type="checkbox"/></p>	<p>The project is located in HUD Region IX. There are no designated coastal barrier resources in HUD Region IX. The project is <u>in compliance</u> with this factor.  Source Documentation: - Coastal Barrier Resources (Appendix A)</p>
<p><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]</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>Due to the nature of this project, <u>compliance cannot be determined</u> for this factor at the Broad (Tier 1) Level. The project area (Sonoma County) includes residential properties in the FEMA-designated Special Flood Hazard Areas. When project location and site specific activities have been determined, an analysis will be completed to ensure compliance with this factor. All</p>

		<p>documentation will be included in the Tier 2 site specific review, to be completed in accordance with the Tier 2 strategy and checklist.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Tier 2 strategy and checklist (Appendix C)</li> </ul>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.5</b></p>		
<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>Due to the nature and location of this project, the project is <u>in compliance</u> with this factor. The project is limited to the rehabilitation of existing residences and does not involve new construction or conversion of land uses facilitating the development of public, commercial, or industrial facilities or five or more dwelling units.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- HUD Air Quality Worksheet (Appendix A)</li> </ul>
<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>Due to the location of this project, <u>compliance cannot be determined</u> with this factor at the Broad (Tier 1) Level. The project area (Sonoma County) includes residential properties in the California Coastal Zone (see Appendix A). When project location and site specific activities have been determined, an analysis will be completed to ensure compliance with this factor. All documentation will be included in the Tier 2 site specific review, to be completed in accordance with the Tier 2 strategy and checklist.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Sonoma County Local Coastal Plan Coastal Zone Extent Map (Appendix A)</li> <li>- Tier 2 strategy and checklist (Appendix C)</li> </ul>
<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>Due to the nature of this project, <u>compliance cannot be determined</u> for this factor at the Broad (Tier 1) Level. The potential impact of contaminants cannot be determined until specific project locations are known. An</p>

		<p>analysis of potential contaminants and toxic substances will be completed during the Tier 2 site specific review, to be completed in accordance with the Tier 2 strategy and checklist.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Tier 2 strategy and checklist (Appendix C)</li> </ul>
<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 checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Due to the nature of this project, the project is <u>in compliance</u> with this factor. Project activities are limited to health, safety, and code-related improvements to single-family dwellings, mobile homes, and individual units in multi-family structures and the installation of Earthquake Resistant Bracing Systems on existing mobile homes.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- HUD Endangered Species Act Worksheet (Appendix A)</li> </ul>
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Due to the nature of this project, the project is <u>in compliance</u> with this factor. Project activities do not include the development of a hazardous facility, new development, construction, rehabilitation that will increase residential densities, or conversion.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- HUD Explosive and Flammable Hazards Worksheet (Appendix A)</li> </ul>
<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 checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Due to the nature of this project, the project is <u>in compliance</u> with this factor. Project activities do not include new construction, acquisition of undeveloped land or actions that could convert agricultural land to non-agricultural land.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- HUD Farmlands Protection Worksheet (Appendix A)</li> </ul>
<p><b>Floodplain Management</b></p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Due to the location and nature of this project, <u>compliance cannot be determined</u> for this factor at the Broad (Tier 1) Level. The project</p>

<p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>		<p>area (Sonoma County) includes residential properties in the 100-year Special Flood Hazard Areas. When project location and site specific activities have been determined, an analysis will be completed to ensure compliance with this factor. All documentation will be included in the Tier 2 site specific review, to be completed in accordance with the Tier 2 strategy and checklist. It should be noted that the Programs do not fund critical actions, as defined in 24 CFR 55.2(b)(3), and projects therefore may occur within the 500-year floodplain without additional documentation.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Tier 2 strategy and checklist(Appendix C)</li> </ul>
<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 SCCDC initiated consultation with the State Historic Preservation Officer (SHPO) on September 3, 2021. In a letter dated October 7, 2021, the SHPO provided historic preservation compliance procedures to be implemented during the Tier 2 site specific review process. Additionally, on October 19, 2021, the SCCDC initiated consultation with Native American Tribes with interest in Sonoma County. This included sending letters to the list of Native American Tribes provided in Appendix B. As of the date of this Broad Level review, the SCCDC has received a response only from the Tribal Historic Preservation Officer (THPO) of the Kashia Band of Pomo Indians. The THPO requested that the Tribe be consulted when projects are located within the Tribe's aboriginal territory and proposing exterior rehabilitation activities.</p> <p>Due to the nature of this project, <u>compliance cannot be determined</u> for this factor at the Broad (Tier 1) Level. Compliance with this factor will be determined during the Tier 2 site specific review process in accordance with</p>

		<p>the Tier 2 strategy and checklist and historic preservation compliance procedures provided by the SHPO on October 7, 2021.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- SHPO Correspondence (Appendix B)</li> <li>- List of Native American Tribes with interest in Sonoma County (Appendix B)</li> <li>- Kashia Band of Pomo Indians THPO Correspondence and aboriginal territory map (Appendix B)</li> <li>- Tier 2 strategy and checklist (Appendix C)</li> </ul>
<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>Due to the nature of this project, <u>compliance cannot be determined</u> for this factor at the Broad (Tier 1) Level. When project location and site specific activities have been determined, an analysis will be completed to ensure compliance with this factor. All documentation will be included in the Tier 2 site specific review, to be completed in accordance with the Tier 2 strategy and checklist.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Tier 2 strategy and checklist (Appendix C)</li> </ul>
<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 checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>Due to the location of this project, the project is <u>in compliance</u> with this factor. The project activities do not affect a sole source aquifer, as there are no aquifers subject to a MOU between EPA and HUD in Sonoma County.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Sole Source Aquifers (Appendix A)</li> </ul>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>Due to the nature of this project, the project is <u>in compliance</u> with this factor. The project does not include any activities that meet the definition of "new construction" as defined in Executive Order 11990.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- HUD Wetlands Protection Worksheet (Appendix A)</li> </ul>

<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 checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Due to the location of this project, the project is <u>in compliance</u> with this factor. The only rivers in Sonoma County are the Russian River, Gualala River, and Petaluma River, none of which are currently designated as wild and scenic rivers. The project will not impact any designated Wild and Scenic River.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- Wild and Scenic Rivers (Appendix A)</li> </ul>
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Due to the nature of this project, the project is <u>in compliance</u> with this factor. The project does not include any activities with the potential to negatively impact residents, but rather would provide comprehensive rehabilitation and targeted hazard mitigation assistance to make needed repairs and improvements to conventional single- and multi-family housing and mobile homes owned and/or occupied by extremely low-, low-, and moderate income households, including some with special needs.</p> <p>Source Documentation:</p> <ul style="list-style-type: none"> <li>- HUD Environmental Justice Worksheet (Appendix A)</li> </ul>

**Determination:**

- Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR
- There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST.

Preparer Signature: \_\_\_\_\_ Date: 12/17/21

Name/Title/Organization: Rebecca Dalske, Senior Planner, LACO Associates, Inc.

Responsible Entity Agency Official Signature: \_\_\_\_\_ Date: 12/17/2021

Name/Title: Dave Kiff, SCCDC Interim Executive Director

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).

**This document represents the Tier 1 or Broad-Level review only. As individual sites are selected, this review will be supplemented by individual Tier 2 or Site-Specific reviews conducted for each site by SCCDC staff. All laws and authorities requiring site-specific analysis will be addressed in these individual reviews. Documentation of the individual reviews will be retained on file in the ERR by the Responsible Entity.**

**References**

California Department of Toxic Substances Control (DTSC). 2021. EnviroStor. Accessed September 23, 2021. Available at: <https://www.envirostor.dtsc.ca.gov/public/>.

County of Sonoma. December 12, 2001. *Current Local Coastal Plan*. Accessed September 22, 2021. Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Local-Coastal-Program/Current/>.

County of Sonoma – Permit Sonoma. No Date. *Airport Safety Zones*. Accessed September 22, 2021. Available at: <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Comprehensive-Airport-Land-Use/Airport-Safety-Zones/>.

Federal Emergency Management Agency (FEMA). No Date. FEMA Flood Map Service Center. Accessed September 2, 2021. Available at: <https://msc.fema.gov/portal/home>.

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United States Department of Housing and Urban Development (HUD). March 2009. HUD Exchange. *HUD Noise Guidebook*. Accessed December 2, 2020. Available at: <https://www.hudexchange.info/resource/313/hud-noise-guidebook/>.

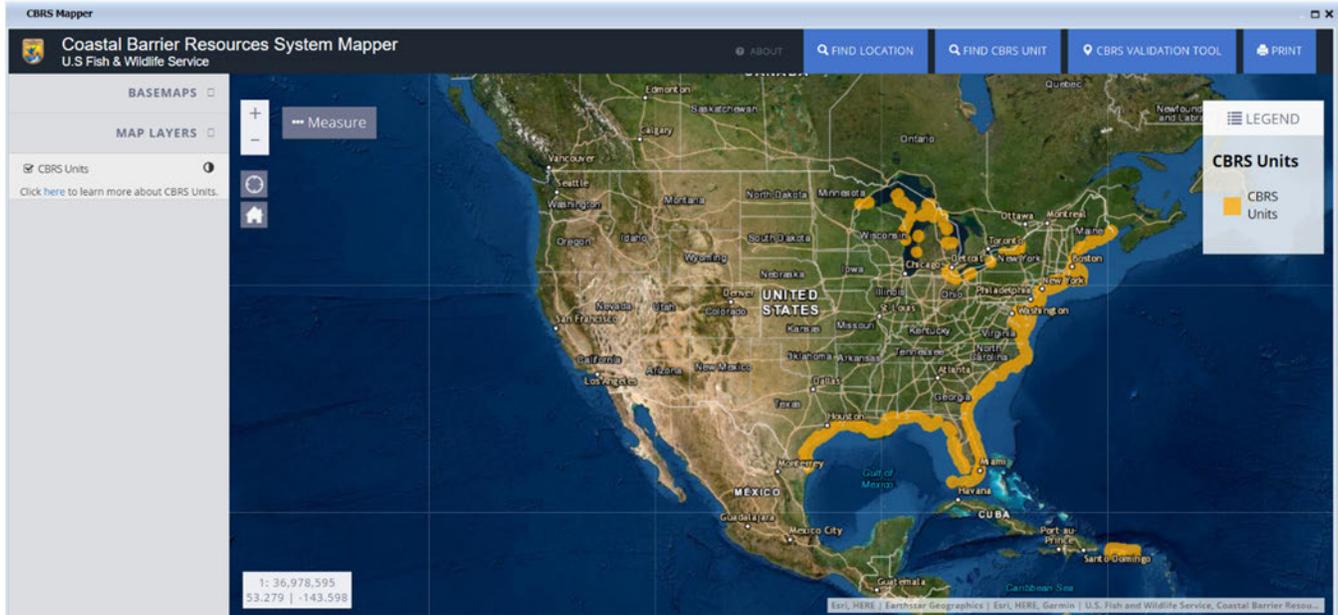
United States Department of the Interior (DOI), National Wild & Scenic Rivers System. No Date. Designated Wild & Scenic Rivers. Accessed September 24, 2021. Available at: <https://www.rivers.gov/california.php>.

United States Environmental Protection Agency (EPA). December 8, 2020. Sole Source Aquifers for Drinking Water. Accessed September 22, 2021. Available at: <https://www.epa.gov/dwssa>.

United States Fish and Wildlife Services (USFWS). February 22, 2021. Coastal Barrier Resources System. CBRS Mapper. Accessed September 22, 2021. Available at: <https://www.fws.gov/cbra/Maps/Mapper.html>.

**Appendix A: Tier 1 Compliance Documentation**

# Coastal Barrier Resources



## Air Quality (CEST and EA)

General Requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/air-quality">https://www.hudexchange.info/environmental-review/air-quality</a>		

### Scope of Work

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

→ Continue to Question 2.

No

*Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

### Worksheet Summary

#### Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

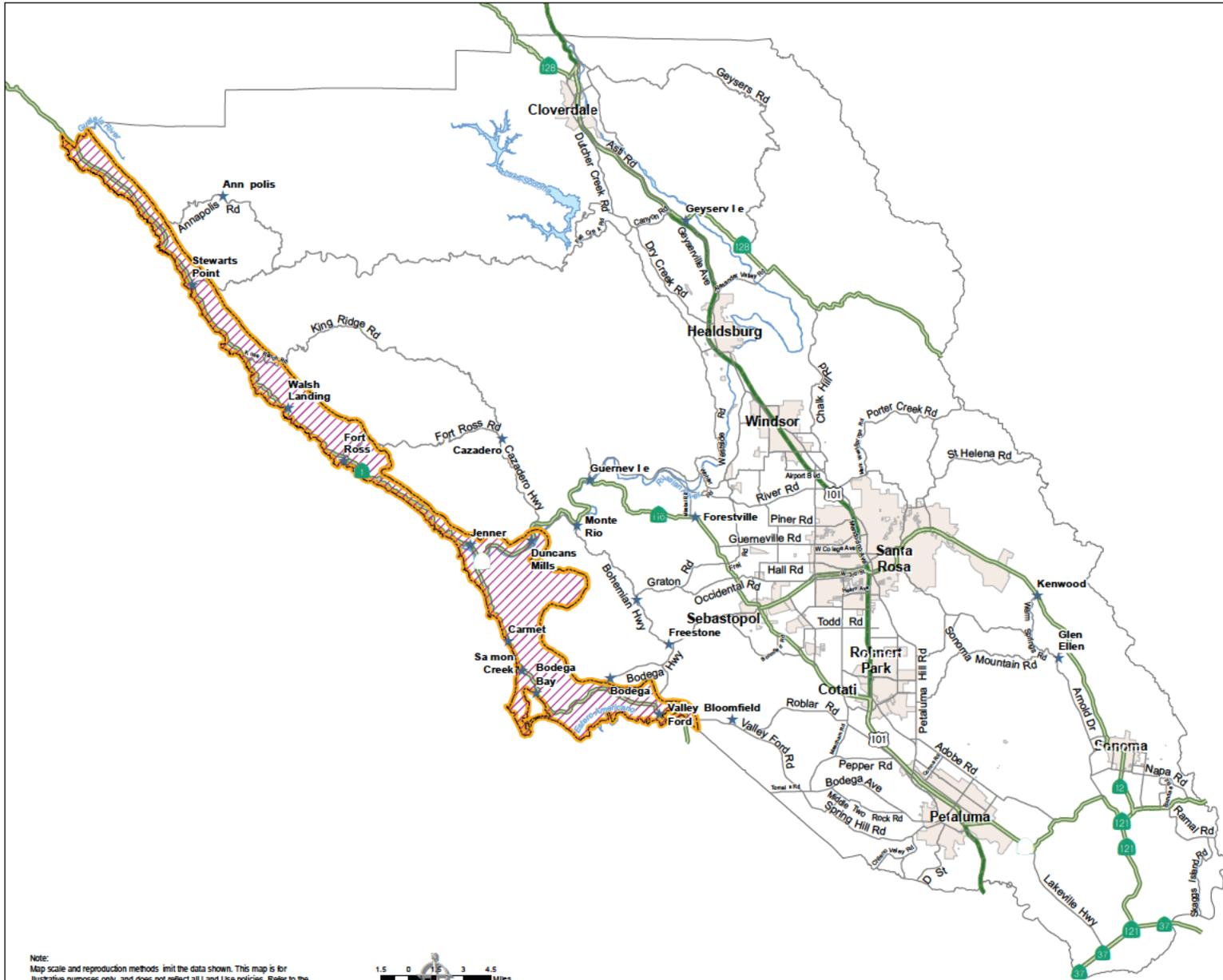
Project activities do not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities or five or more dwelling units. Therefore, it can be assumed that the project's emissions are below *de minimis* levels and the project is in compliance with the Clean Air Act.

Are formal compliance steps or mitigation required?

Yes

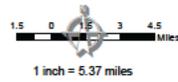
No

# Local Coastal Plan Coastal Zone Extent



- Sonoma Coastal Zone Boundary 
- City Limits 
- Main Arterial 
- Community 

Note:  
Map scale and reproduction methods limit the data shown. This map is for illustrative purposes only, and does not reflect all Land Use policies. Refer to the official Land Use maps on file at the Permit and Resource Management Department.



Permit and Resource Management Department  
2550 Ventura Avenue, Santa Rosa, California 95403  
707-565-1900 FAX 707-565-1103



## Endangered Species Act (CEST)

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i> ); particularly section 7 (16 USC 1536).	50 CFR Part 402
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/endangered-species">https://www.hudexchange.info/environmental-review/endangered-species</a>		

### 1. Does the project involve any activities that have the potential to affect species or habitats?

- No, the project will have No Effect due to the nature of the activities involved in the project.  
→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.
- No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.  
Explain your determination:

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

- Yes, the activities involved in the project have the potential to affect species and/or habitats. → Continue to Question 2.

### Worksheet Summary

#### Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Project activities are limited to health, safety, and code-related improvements to single-family dwellings, mobile homes, and individual units in multi-family structures and the installation of Earthquake Resistant Bracing Systems on existing mobile homes. As little to no ground disturbance would be anticipated and all project activities would occur on existing residential structures, no impacts would occur.

### Are formal compliance steps or mitigation required?

- Yes  
 No

## Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities">https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities</a>		

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

→ Go directly to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes

→ Continue to Question 3.

### Worksheet Summary

#### Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Project activities do not include the development of a hazardous facility, new development, construction, rehabilitation that will increase residential densities, or conversion. Project activities are limited to health, safety, and code-related improvements to single-family dwellings, mobile homes, and individual units in multi-family structures and the installation of Earthquake Resistant Bracing Systems on existing mobile homes.

Are formal compliance steps or mitigation required?

Yes

No

## Farmlands Protection (CEST)

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	<a href="#">7 CFR Part 658</a>
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/farmlands-protection">https://www.hudexchange.info/environmental-review/farmlands-protection</a>		

**1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?**

Yes → Continue to Question 2.

No

**Explain how you determined that agricultural land would not be converted:**

Project activities are limited to the rehabilitation of existing single family and multi-family residential structures and do not include new construction, acquisition of undeveloped land, or actions that could convert agricultural land to non-agricultural land.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting your determination.

### Worksheet Summary

#### **Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The proposed project activities are limited to health, safety, and code-related improvements to single-family dwellings, mobile homes, and individual units in multi-family structures and the installation of Earthquake Resistant Bracing Systems on existing mobile homes. Based on the nature of the project, the project does not involve new construction, acquisition of undeveloped land, or conversion that could convert agricultural land to a non-agricultural use.

**Are formal compliance steps or mitigation required?**

Yes

No

## Wetlands (CEST)

General requirements	Legislation	Regulation
Executive Order 11990 discourages that direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/wetlands-protection">https://www.hudexchange.info/environmental-review/wetlands-protection</a>		

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?**

The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

### Worksheet Summary

#### **Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

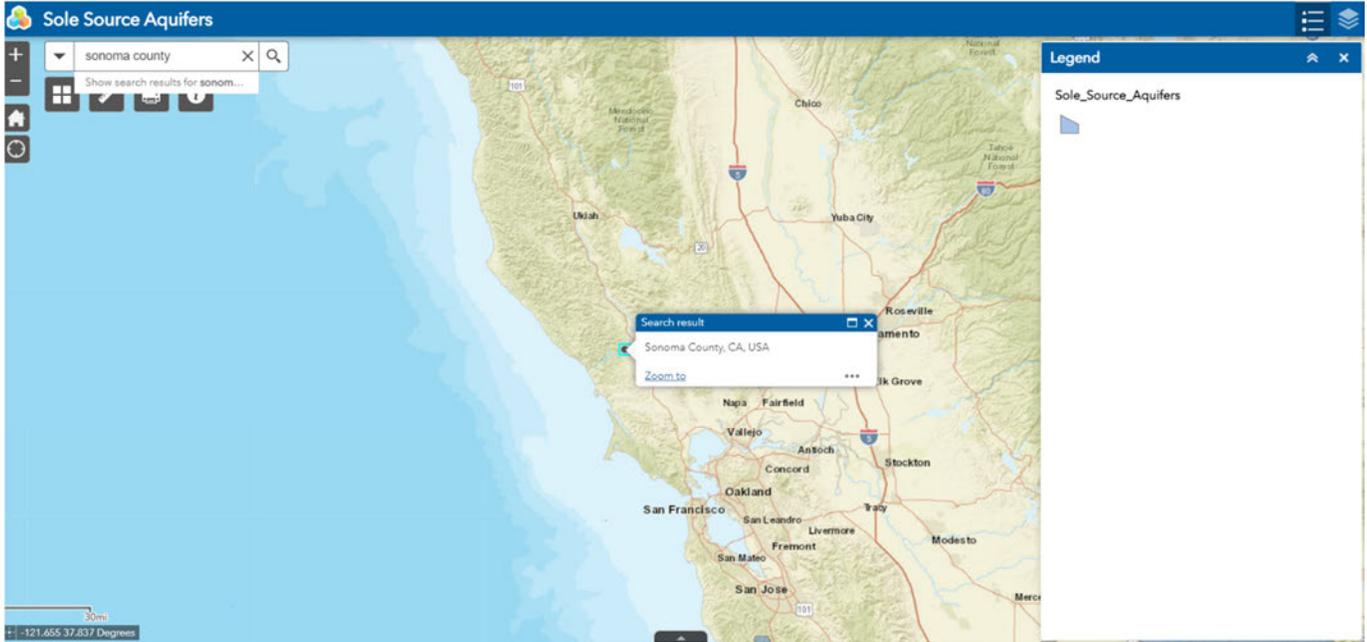
The proposed project activities are limited to health, safety, and code-related improvements to single-family dwellings, mobile homes, and individual units in multi-family structures and the installation of Earthquake Resistant Bracing Systems on existing mobile homes. The project does not include any activities that meet the definition of "new construction" as defined in Executive Order 11990.

#### **Are formal compliance steps or mitigation required?**

Yes

No

# Sole Source Aquifers



# Wild and Scenic Rivers

The screenshot shows the website interface for the National Wild and Scenic Rivers System, specifically for California. At the top, the logo for the National Wild and Scenic Rivers System is on the left, and the title "NATIONAL WILD AND SCENIC RIVERS SYSTEM" is on the right. Below the title is a navigation menu with links for "NATIONAL SYSTEM", "MANAGEMENT", "RESOURCES", "PUBLICATIONS", "CONTACT US", "50 YEARS", and "SITE INDEX".

The main content area is titled "CALIFORNIA". It features a text box stating: "California has approximately 189,454 miles of river, of which 1,999.6 miles are designated as wild & scenic—1% of the state's river miles." Below this text is a map of California with blue lines indicating designated rivers. The map includes a legend, zoom controls (+ and -), and a scale bar. Major cities like Sacramento, San Francisco, Fresno, and Los Angeles are labeled. The map also shows the borders with Oregon and Nevada.

To the right of the map is a section titled "EXPLORE DESIGNATED RIVERS". It contains a small map of the United States with California highlighted. Below this are two dropdown menus: "Choose A State" and "Choose A River", each with a "Go" button. Below the dropdowns is a small image of a river landscape and a quote: "Seen as barren by the first explorers to today's first-time visitors, the rivers of the high desert simply hide their treasures well."

## Environmental Justice (CEST)

Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/environmental-justice">https://www.hudexchange.info/environmental-review/environmental-justice</a>		

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

**1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?**

Yes → Continue to Question 2.

No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

### Worksheet Summary

#### **Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not include any activities with the potential to negatively impact low-income or minority communities, but rather would provide comprehensive rehabilitation and targeted hazard mitigation assistance to make needed repairs and improvements to conventional single- and multi-family housing and mobile homes owned and/or occupied by extremely low-, low-, and moderate income households, including some with special needs.

#### **Are formal compliance steps or mitigation required?**

Yes

No

**Appendix B: Historic Preservation Documentation**

**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov [www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov)

October 7, 2021

[VIA EMAIL]

Refer to HUD\_2021\_0903\_003

Ms. Rebecca Dalske  
Associate Planner/ Project Manager  
LACO Associates  
1550 Airport Boulevard, Suite 102  
Santa Rosa, CA 95403

Re: Sonoma County Development Commission HUD Funded Single Family  
Residential Rehabilitation Programs

Dear Ms. Dalske:

The California State Historic Preservation Office (SHPO) received the consultation submittal for the above referenced undertaking for our review and comment pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations found at 36 CFR Part 800. The regulations and advisory materials are located at [www.achp.gov](http://www.achp.gov).

Your letter informed us that the Sonoma County Development Commission administers residential rehabilitation programs assisted by funding from the U.S. Department of Housing and Urban Development (HUD). SHPO recommends that the County agree to the following Section 106 consultation procedures.

Rehabilitation programs, like all federal undertakings, must comply with Section 106 of the National Historic Preservation Act. The first step in that compliance process is identifying and evaluating all known and potential historic properties within the project area of potential effects (APE). Historic properties are those listed in the National Register of Historic Places and those that meet the National Register eligibility criteria. The identification of historic properties in the project APE helps to ensure that rehabilitation activities follow the Secretary of the Interior's Standards for Rehabilitation. These standards and guidelines allow for the continued use and sensitive alterations to buildings, while respecting existing historic materials and design.

For single-family residential undertakings, SHPO recommends that the County follow the historic preservation compliance procedures explained in the attachment to this letter. The procedures should be self-explanatory. Pay particular attention to Thresholds 1 and 2. These thresholds should limit the volume of projects requiring consultation between our agencies. The procedures state that consultation with the SHPO is only necessary when a property meets the listed age criterion and exterior work is proposed. Please note that the exclusion of interior work from review is only for single-family residences or duplexes, not for larger residential buildings that have interior public spaces, such as lobbies or corridors. The County does not need to consult with our office for projects involving rehabilitation of mobile homes or trailers.

[Type here]

SHPO requests that the County consult with our office if a rehabilitation project involves substantial earth moving, such as footing/foundation trenching, utility line excavation (sewer, water, gas, leach, etc.), sprinklers, or septic tanks, and the possibility exists that such earth disturbance may or will occur on or near an archeological site. In these cases, consultation should occur well in advance of project startup.

For undertakings other than rehabilitation, such as demolition, reconstruction, and new construction, the County needs to consult on a case-by-case basis pursuant to 36 CFR Part 800.

If the County agrees to the suggested process, please have the appropriate individual sign the concurrence block at the bottom of this letter and return a copy to us.

Please do not hesitate to contact Shannon Lauchner Pries, State Historian II, with the Local Government & Environmental Compliance Unit at [shannon.pries@parks.ca.gov](mailto:shannon.pries@parks.ca.gov) with any questions or comments.

Sincerely,

A black rectangular redaction box covering the signature of Julianne Polanco.

Julianne Polanco  
State Historic Preservation Officer

Enclosures

I concur with the Section 106 compliance process outlined above.

▪ Sonoma County Development Commission

David A. Kiff

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Interim Executive Director  

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(title)

**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**Armando Quintero, *Director*

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov [www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov)

## Housing Rehabilitation Program Projects When and How Do We Consult with the CA SHPO When We Have A Letter of Understanding?

- Threshold 1: If an application calls for work that is limited to the interior of a property (and the work will not be visible from the exterior at all) you do not need to consult the SHPO, regardless of the property's age. (Your Section 106 consultation obligations are complete.)
- Threshold 2: It is important to know the date of the subject property because properties constructed less than 45- 50 ago are rarely eligible for the National Register of Historic Places and, therefore, historic properties for Section 106 consultation. If an application calls for work on the exterior of a property that is less than 45- 50 years old, you do not need to consult the SHPO. (Your Section 106 consultation obligations are complete.)
- Threshold 3: If an application calls for work on the exterior of a property that is 45- 50 years or older, you must consult the SHPO, submitting a package that includes the following documentation and analysis for our review and comment:
- Clear photographs of the exterior of the property.
  - Information about the age of the property. This can be exact if the information is available, or a best guesstimate based on the style and type of property, and development patterns of the area.
  - A description of the work associated with the undertaking.
  - A DPR 523A Primary Record and a DPR 523B Building, Structure, and Object Record for the property that includes only the information relevant to the undertaking. These forms are available on the CA SHPO website at [www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov).
  - A summary of historic information about the property obtained from sources like local historical societies, Native American tribes, interested parties, historic preservation boards or commissions, Planning Departments, etc.
  - Historic resources surveys information completed by, or for, the local government at an earlier date.

[Type here]

- A statement determining whether or not the local government believes the property is eligible for the National Register.

SHPO Response:

After reviewing the information submitted by the local government, the CA SHPO will do one of three things:

- If we agree with the information and analysis that has been submitted by the local government, the SHPO will concur with the local government's determination that the property is, or is not, eligible for the National Register of Historic Places.
- If it is unclear from the documentation provided for the undertaking whether or not the property meets the National Register criteria for significance, the SHPO will ask for additional information.
- If we disagree with the local government's determination of eligibility, the SHPO will let you know that, and why we disagree.

What the SHPO response you received means for your project:

- If the SHPO concurs with the local government that the property does not meet National Register criteria, the work may proceed without further consultation. (Your Section 106 consultation obligations are complete.)
- If the SHPO concurs with the local government determination that the property meets the National Register criteria for significance, the project work should follow the *Secretary of the Interior's Standards Rehabilitation*. Project plans must be submitted for our review, and we will let you know if the project complies with the *Standards*.
  - If the project plans do comply with the *Standards* the project will proceed on the basis of a *Finding of no adverse effects*. (Your Section 106 consultation obligations are complete.)
  - If the project plans do not comply with the *Standards*, the SHPO will recommend project modifications that we hope you will accept.
    - If the local government and applicant cannot or will not make the recommended modifications consultation will continue to resolve the adverse effects. This a long process that can seriously delay a project, so it should be avoided whenever possible. (Your Section 106 consultation obligations are only complete once a Memorandum of Agreements is executed, memorializing the consultation to resolve the adverse effects discussed above.)

Sonoma County Tribal Contact List  
HUD Tribal Directory for Tribes with Interests in Sonoma County, California

- |  |   |
|--|---|
| <input type="checkbox"/> Absentee-Shawnee Tribe of Indians of Oklahoma<br>Attn: Devon Frazier, THPO<br>2025 South Gordon Cooper Drive<br>Shawnee, OK 74801<br>106NAGPRA@astribe.com                    | <input type="checkbox"/> Kashia Band of Pomo Indians of the Stewarts Point Rancheria, California<br>Attn: Dino Franklin, Jr., Chairperson<br>1420 Guerneville Road, Suite 1<br>Santa Rosa, California 95403<br>vaughn@stewartspoint.org |
| <input type="checkbox"/> Absentee-Shawnee Tribe of Indians of Oklahoma<br>Attn: John Johnson, Governor<br>2025 South Gordon Cooper Drive<br>Shawnee, OK 74801<br>jjohnson@astribe.com                  | <input type="checkbox"/> Kashia Band of Pomo Indians of the Stewarts Point Rancheria, California<br>Attn: Anthony Macias, THPO<br>1420 Guerneville Road, Suite 1<br>Santa Rosa, CA 95403<br>anthony@stewartspoint.org                   |
| <input type="checkbox"/> Cloverdale Rancheria of Pomo Indians<br>Attn: Patricia Hermosillo, Chairperson<br>555 S. Cloverdale Blvd.<br>Cloverdale, California 95425                                     | <input type="checkbox"/> Koi Nation of Northern California<br>Attn: Rob Morgan, THPO<br>P.O. Box 3162<br>Santa Rosa, CA 95402<br>robmorganthpo@koination.com  |
| <input type="checkbox"/> Dry Creek Rancheria Band of Pomo Indians<br>Attn: Tieraney Giron, THPO<br>P.O. Box 607<br>Geyserville, California 95441<br>tieraneyg@drycreekrancheria.com                    | <input type="checkbox"/> Koi Nation of Northern California<br>Attn: Darin Beltran, Chairperson<br>P.O. Box 3162<br>Santa Rosa, CA 95402<br>kn@koination.com   |
| <input type="checkbox"/> Dry Creek Rancheria Band of Pomo Indians<br>Attn: Chris Wright, Chairperson<br>P.O. Box 607<br>Geyserville, California 95441<br>ChrisW@drycreekrancheria.com                  | <input type="checkbox"/> Lytton Rancheria<br>Attn: Margie Mejia, Chairperson<br>437 Aviation Boulevard<br>Santa Rosa, California 95403  |
| <input type="checkbox"/> Federated Indians of Graton Rancheria, California<br>Attn: Greg Sarris, Chairperson<br>6400 Redwood Drive, Suite 300<br>Rohnert Park, CA 94928<br>LRoss@gratonrancheria.com   | <input type="checkbox"/> Middletown Rancheria of Pomo Indians of California<br>Attn: Jose Simon, Chairperson<br>P.O. Box 1035<br>Middletown, California 95461<br>Jsimon@middletownrancheria.com   |
| <input type="checkbox"/> Federated Indians of Graton Rancheria, California<br>Attn: Buffy McQuillen, THPO<br>6400 Redwood Drive, Suite 300<br>Rohnert Park, CA 94928<br>bmcquillen@gratonrancheria.com | <input type="checkbox"/> Middletown Rancheria of Pomo Indians of California<br>Attn: Michael Rivera, THPO<br>P.O. Box 1035<br>Middletown, California 95461<br>mlrivera@middletownrancheria.com  |
| <input type="checkbox"/> Scotts Valley Band of Pomo Indians<br>Attn: Gabriel Ray, Chairperson<br>1005 Parallel Drive<br>Lakeport, CA 95453<br>gray@svpomo.org  |   |

**Appendix C: Tier 2 Site-Specific Review Strategy and Checklists**

## **Tier 2 Site Specific Review Strategy**

The following checklists shall be completed to document compliance with the following laws and authorities not addressed in the Tier 1 broad-level review:

- Airport Hazards: 24 CFR Part 51 Subpart D;
- Flood Insurance: Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a];
- Coastal Zone Management: Coastal Zone Management Act, sections 307(c) & (d);
- Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)];
- Floodplain Management: Executive Order 11988, particularly section 2(a); 24 CFR Part 55;
- Historic Preservation: National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800; and
- Noise Abatement and Control: Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B.

Complete each checklist for each project site, providing descriptions and documentation when needed. These checklists and the required documentation will become part of the Environmental Review Record for each project location

**Tier 2 Site Specific Review Checklist**

**Project Location:**

**Activity Description:**

**Date of Site Inspection:**

**Name/Title/Organization of Inspector:**

---

---

**Preparer Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Name/Title/Organization:**

**Responsible Entity Official Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Name/Title:**

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**Determination:**

- This Site Specific Review has determined that there are no circumstances which require additional compliance with any of the federal laws and authorities cited at 24 CFR § 58.5. **Funds may be committed and drawn down** for this project; OR
- This Site Specific Review cannot immediately move forward because there are circumstances which require compliance with one or more federal laws and authorities cited at 24 CFR § 58.5. **Complete consultation/mitigation protocol requirements and save documentation of completed consultation/mitigation to the project file** before committing or drawing down any funds for this site; OR
- This Site Specific Review has determined that the project cannot comply with one or more federal laws and authorities cited at 24 CFR § 58.5. **The project cannot proceed at this location.**

**Airport Hazards**

General policy	Legislation	Regulation
It is HUD’s policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/airport-hazards">https://www.hudexchange.info/environmental-review/airport-hazards</a> Sonoma County Airport Safety Zones: <a href="https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Comprehensive-Airport-Land-Use/Airport-Safety-Zones/">https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Comprehensive-Airport-Land-Use/Airport-Safety-Zones/</a>		

**1. Is your project within 2,500 feet of a civilian airport?**

- No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*
- Yes → *Continue to Question 2.*

**2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ)?**

- Review the relevant Airport Safety Zone map at the link above to help with this determination.
- Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*
  - No, project is not within a RPZ/CZ  
 → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

**Has this project been determined to be in compliance?**

- Yes
- No

## Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1 (b).
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/flood-insurance">https://www.hudexchange.info/environmental-review/flood-insurance</a> FEMA FIRM Maps: <a href="https://msc.fema.gov/portal/home">https://msc.fema.gov/portal/home</a>		

### 1. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

#### Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area (SFHA)?

- No → Continue to the Worksheet Summary and note that the project is not located in a SFHA.  
 Yes → Continue to Question 2.

### 2. Is the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards?

- Yes, the community is participating in the National Flood Insurance Program.  
 For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.  
 → Continue to the Worksheet Summary.
- Yes, less than one year has passed since FEMA notification of Special Flood Hazards.  
 If less than one year has passed since notification of Special Flood Hazards, no flood insurance is required.  
 → Continue to the Worksheet Summary.
- No. The community is not participating, or its participation has been suspended.  
 → Federal assistance may not be used at this location.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- The project is limited to interior rehabilitation activities only.
- The project is not located in a FEMA-designated SFHA. Provide the FEMA map panel numbers and dates.
- A summary of your response to question 2.

**Has this project been determined to be in compliance?**

- Yes
- No

### Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930
References		
<a href="https://www.onecpd.info/environmental-review/coastal-zone-management">https://www.onecpd.info/environmental-review/coastal-zone-management</a> Sonoma County LCP: <a href="https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Local-Coastal-Program/Current/">https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Local-Coastal-Program/Current/</a>		

**1. Is the project located in, or does it affect, the Coastal Zone of Sonoma County?**

- Yes → Continue to Question 2.
- No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.

**2. Does this project include activities that are subject to state review\*?**

- Yes → Continue to Question 3.
- No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

\*Activities are subject to state review if a Coastal Development Permit (CDP) from the Sonoma County Permit & Resource Management Department (PRMD) is required. Contact PRMD with project details to ask if a CDP is required. If you can demonstrate that a CDP is not required, check "No" and proceed to the Worksheet Summary.

**3. Has this project been determined to be consistent with the State Coastal Management Program?**

- Yes, with mitigation. → Continue to Question 4.
- Yes, without mitigation. → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.
- No, project must be canceled. → Project cannot proceed at this location.

**4. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

→Continue to the Worksheet Summary below. Provide documentation of the consultation (including the State Coastal Management Program letter of consistency), CDP, and any other documentation used to make your determination.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map showing project site located outside the Coastal Zone
- Documentation that project activities are not subject to state review
- State Coastal Management Program letter of consistency
- Any additional relevant documentation

**Are formal compliance steps or mitigation required?**

- Yes
- No

### Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
<b>Reference</b>		
<a href="https://www.hudexchange.info/programs/environmental-review/site-contamination">https://www.hudexchange.info/programs/environmental-review/site-contamination</a> Envirostor: <a href="https://www.envirostor.dtsc.ca.gov/public/">https://www.envirostor.dtsc.ca.gov/public/</a> Geotracker: <a href="https://geotracker.waterboards.ca.gov/">https://geotracker.waterboards.ca.gov/</a> Enviromapper: <a href="https://enviro.epa.gov/enviro/em4ef.home">https://enviro.epa.gov/enviro/em4ef.home</a>		

- Evaluate the site for contamination\* and review the database links above to determine if any hazardous sites are located nearby. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?**

Provide a map or other documentation of absence or presence of contamination and explain evaluation of site contamination in the Worksheet Summary below.

No → Explain. Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

**Explain:**

Yes → Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 2.

\*Additional supporting documentation may include other inspections and reports such as an ASTM Phase I Environmental Site Assessment (ESA) report, ASTM Phase II ESA report, Remediation or clean-up plan, or ASTM Vapor Encroachment Screening.

### 2. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental mitigation cannot be mitigated, then HUD assistance may not be used for the project at this site.

#### Can adverse environmental impacts be mitigated?

- Adverse environmental impacts cannot feasibly be mitigated  
→ Project cannot proceed at this location.
- Yes, adverse environmental impacts can be eliminated through mitigation.  
→ Provide all mitigation requirements<sup>1</sup> and documents. Continue to Question 3.

<sup>1</sup> Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

**3. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls<sup>2</sup>, or use of institutional controls<sup>3</sup>.**

**If a remediation plan or clean-up program was necessary, which standard does it follow?**

- Complete removal
- Risk-based corrective action (RBCA)
- Other

→ Continue to the Worksheet Summary.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map or other documentation demonstrating absence or presence of contamination
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional relevant documentation

**Are formal compliance steps or mitigation required?**

- Yes
- No

<sup>2</sup> Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

<sup>3</sup> Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

## Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/floodplain-management">https://www.hudexchange.info/environmental-review/floodplain-management</a> Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs): <a href="https://msc.fema.gov/portal/home">https://msc.fema.gov/portal/home</a>		

1. Does [24 CFR 55.12\(c\)](#) exempt this project from compliance with HUD's floodplain management regulations in Part 55? If project is exempt under 55.12(c)(7) or (8), provide supporting documentation.

Yes, per 55.12(c)(7).

*An incidental portion of the project site is situated in an adjacent floodplain; however,*

*(i) The proposed construction and landscaping activities (except for minor grubbing, clearing of debris, pruning, sodding, seeding, or other similar activities) do not occupy or modify the 100-year floodplain or the wetland;*

*(ii) Appropriate provision is made for site drainage that would not have an adverse effect on the wetland; and*

*(iii) A permanent covenant or comparable restriction is placed on the property's continued use to preserve the floodplain or wetland;*

Yes, per 55.12(c)(8).

*The nonwetland site is in a floodplain for which FEMA has issued:*

*(i) A final Letter of Map Amendment (LOMA), final Letter of Map Revision (LOMR), or final Letter of Map Revision Based on Fill (LOMR-F) that removed the property from a FEMA-designated floodplain location; or*

*(ii) A conditional LOMA, conditional LOMR, or conditional LOMR-F if HUD or the responsible entity's approval is subject to the requirements and conditions of the conditional LOMA or conditional LOMR;*

Yes, per 55.12(c)(10):

*The project is directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.*

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

No → Continue to Question 2.

2. Provide a FEMA/FIRM or ABFE map showing the site.

Provide the FIRM downloaded for the Flood Insurance compliance section, above.

**Does the project occur in a floodplain?**

No → The review is in compliance. Continue to the Worksheet Summary below.

Yes, 500-year floodplain (B Zone or shaded X Zone) → The review is in compliance with this section. Continue to the Worksheet Summary below.

- Yes, Floodway → Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.
- Yes, Coastal High Hazard Area (V Zone) → Continue to Question 3, 8-Step Process
- Yes, 100-year floodplain (A Zone) → Continue to Question 3, 8-Step Process

### 3. **8-Step Process.**

**Does the 8-Step Process apply? Select one of the following options:**

- 8-Step Process is inapplicable per 55.12(b)(2)

*The project includes financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(10).*

*→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

- 5-Step Process is applicable per 55.12(a)(3).

*The project involves the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects...and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10), and the footprint of the structure and paved areas is not significantly increased.*

*→ Provide documentation of 5-Step Process. Continue to Question 4, Mitigation*

- 8-Step Process applies.

*→ Provide a completed 8-Step Process, including the early public notice and the final notice. Continue to Question 4, Mitigation*

### 4. **Mitigation**

**For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

**Which of the following mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.**

- Permeable surfaces
- Natural landscape enhancements that maintain or restore natural hydrology
- Planting or restoring native plant species
- Bioswales
- Evapotranspiration
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions

- Natural Resources Conservation Service conservation easements or similar easements
- Floodproofing of structures
- Elevating structures including freeboarding above the required base flood elevations
- Other

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Documentation supporting the determination that an exception at 55.12(c) applies.
- FEMA map showing the project is not located in a SFHA.
- FEMA map showing the project is located in a SFHA and justification that, per 55.12(b)(2), the 8-Step Process is not required.
- FEMA map showing the project is located in a SFHA, documentation that the 5-Step Process was completed, and justification of the applicability of 55.12(a)(3).
- FEMA map showing the project is located in a SFHA along with documentation of the 8-Step Process and required notices.

**Are formal compliance steps or mitigation required?**

- Yes
- No

### Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	<a href="#">36 CFR 800 "Protection of Historic Properties"</a>
<b>References</b>		
<p><a href="https://www.hudexchange.info/environmental-review/historic-preservation">https://www.hudexchange.info/environmental-review/historic-preservation</a></p> <p>National Register of Historic Places: <a href="https://www.nps.gov/subjects/nationalregister/database-research.htm">https://www.nps.gov/subjects/nationalregister/database-research.htm</a></p> <p>Office of Historic Preservation Section 106 Compliance: <a href="https://ohp.parks.ca.gov/?page_id=1071">https://ohp.parks.ca.gov/?page_id=1071</a></p> <p>SHPO Concurrence Letter dated October 7, 2021 and Kashia Band of Pomo Indians aboriginal territory map: see Appendix B of the Broad-Level Tier 1 Environmental Review</p>		

NOTE: This worksheet contains two (2) sections: Tribal Consultation and Section 106 Review. Compliance with this worksheet cannot be met until both sections are completed.

### Tribal Consultation

**Is consultation with the Kashia Band of Pomo Indians required?** Refer to the Kashia Band of Pomo Indians aboriginal territory map provided in Appendix B of the Broad-Level Tier 1 Environmental Review.

- No, the site is located outside the aboriginal territory of the Kashia Band of Pomo Indians.  
→ Document the project location in relation to the aboriginal territory in the Worksheet Summary. No Tribal consultation is required.
- No, the site is located with the aboriginal territory of the Kashia Band of Pomo Indians; however, the project is limited to interior rehabilitation activities.  
→ Provide a summary of the project activities in the Worksheet Summary. No Tribal consultation is required.
- Yes, the site is located with the aboriginal territory of the Kashia Band of Pomo Indians and the project includes exterior rehabilitation activities.  
→ Contact the Tribal Historic Preservation Officer (THPO) of the Kashia Band of Pomo Indians to initiate consultation. Proceed according to the recommendations of the THPO. Answer the following question once consultation is complete. Allow a 30-day response period prior to carrying out any choice limiting activity for the site-specific project.

**Is mitigation required to satisfy the Kashia Band of Pomo Indians?**

- No, no mitigation is required to proceed with the project.  
→ Provide a summary of the consultation in the Worksheet Summary and include any written correspondence or other relevant documents.
- Yes, mitigation is required.  
→ Explain in detail the exact conditions or measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

## Section 106 Review

**Is Section 106 review required for your project?** Please note, a “No” answer to this question does not relieve you from any Tribal consultation requirements, as determined in Question 1.

- No, the project is limited to rehabilitation of a mobile home or trailer.  
→ Continue to the Worksheet Summary and refer to the SHPO concurrence letter dated October 7, 2021.
- No, the project is limited to interior rehabilitation activities on a single-family residential structure or duplex or exterior rehabilitation activities on a single-family residential structure or duplex that is less than 45-50 years old.  
→ Continue to the Worksheet Summary and refer to the SHPO concurrence letter dated October 7, 2021. Note the age of the structure (year built) in the Worksheet Summary.
- Yes, the project includes exterior rehabilitation activities on a single-family residential structure or duplex that is 45-50 years or older, or rehabilitation of a multi-family residential building.  
→ Continue to Step 1.
- Yes, the project includes substantial earth moving, such as footing/foundation trenching, utility line excavation (sewer, water, gas, leach, etc.), sprinklers, or septic tanks, and the possibility exists that such earth disturbance may or will occur on or near an archaeological site.  
→ Continue to Step 1.

Consultation with the State Historic Preservation Officer (SHPO) was initiated during the Broad-Level Tier 1 Environmental Review. The following steps are required based on recommendations provided by the SHPO in a letter dated October 7, 2021.

Step 1: Complete property research and consult with the SHPO

Step 2: Assess effects of the project on historic properties

Step 3: Resolve any adverse effects (if any identified)

### Step 1 – Complete property research and consult with the SHPO

**Define the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE.** Attach an additional page if necessary.

**Document the affected property.** Take photographs of the property and area(s) of proposed improvements. Complete the Primary Record and Building, Structure, and Object Record forms following this worksheet, including the estimated age of the property and a description of the work to be completed. Include any historic information obtained from historical societies, informants, preservation boards, commissions, planning departments, etc. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. Also check the National Register of Historic Places (link provided in references, above).

**Determine if the property is eligible for the National Register.** If not already listed on the National Register of Historic Places, determine whether or not the property is eligible for the National Register.

**Send property documentation (photographs; Primary Record; Building, Structure, and Object Record), historic properties information listed above (if any), and statement on whether or not the property is eligible for the National Register to the SHPO.** Submit materials according to the procedures (for mailing or emailing) identified on the Section 106 website (link provided in References, above). The SHPO has 30 days to respond.

**Receive a response from the SHPO.** In accordance with the SHPO letter dated October 7, 2021, the SHPO will determine if further consultation is required, as follows:

- If the SHPO concurs with the determination that the property does not meet National Register criteria, the work may proceed without further consultation.
  - Proceed to Step 2 on the basis of "No Historic Properties Affected" determination. Reference the SHPO concurrence.
- If the SHPO concurs with the determination that the property meets the National Register criteria for significance, the SHPO recommends that the proposed work follow the Secretary of the Interior's Standards for Rehabilitation (36 CFR Part 67.7). Project plans must be submitted for to the SHPO for review and a compliance evaluation.
  - If the project plans are found to comply with the Standards, proceed to Step 2 on the basis of a finding of "No Adverse Effect".
  - If the project plans do not comply with the Standards, the SHPO will recommend project modifications. If the modifications are accepted, continue to Step 2 on the basis of a finding of "No Adverse Effect". If the modifications are not accepted, continue to Step 2 on the basis of a finding of "Adverse Effect".
- If it is unclear from the documentation provided for the undertaking whether or not the property meets the National Register criteria for significance, the SHPO will ask for additional information.
- If the SHPO disagrees with the determination of eligibility, the SHPO will provide a reason for disagreement. Proceed in accordance with the SHPO disagreement letter.

## Step 2 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from SHPO and other consulting parties.**

No Historic Properties Affected

**Document reason for finding:**

No historic properties present.

→ Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.

Historic properties present, but project will have no effect upon them.

→ Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to [\(36 CFR 800.4\(d\)\(1\)\)](#) and consult further to try to resolve objection(s).

No Adverse Effect

**Document reason for finding:**

**Does the No Adverse Effect finding contain conditions?**

Yes

**Check all that apply:** (check all that apply)

- Avoidance  
 Modification of project  
 Other

**Describe conditions here:**

→ Monitor satisfactory implementation of conditions. Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.

No → Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to [\(36 CFR 800.5\(c\)\(2\)\)](#) and consult further to try to resolve objection(s).

Adverse Effect

**Document reason for finding:**

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)

Notify the Advisory Council on Historic Preservation of the Adverse Effect and provide the documentation outlined in [36 CFR 800.11\(e\)](#). The Council has 15 days to decide whether to enter the consultation.

→ Continue to Step 3.

### Step 3 - Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD guidance and [36 CFR 800.6 and 800.7](#).

**Were the Adverse Effects resolved?**

Yes

**Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:**

**For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

→ Provide signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA). Continue to the Worksheet Summary.

No → The project must be cancelled unless the "Head of Agency" approves it. Either provide approval from the "Head of Agency" or cancel the project at this location.

**Describe the failure to resolve Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation and "Head of the Agency":**

**Explain in detail the exact conditions or measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

→ Provide correspondence, comments, documentation of decision, and "Head of Agency" approval. Continue to the Worksheet Summary.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Nature of project activities (ie. interior only, exterior with no ground disturbance, exterior with ground disturbance)
- Type of structure(s) involved in the project (ie. mobile home or trailer, single-family residential structure, duplex, multi-family residential structure)
- Location of the project in relation to the aboriginal territory of the Kashia Band of Pomo Indians
- Names of all consulted parties and relevant consultation dates
- Any additional relevant documentation

**Are additional steps or mitigation required?**

- Yes
- No

State of California — The Resources Agency  
 DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #  
 HRI #  
 Trinomial  
 NRHP Status Code

Other Listings  
 Review Code

Reviewer

Date

Page of \*Resource Name or #:

**P1. Other Identifier:**

\*P2. Location:  Not for Publication  Unrestricted

\*a. County:

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad: Date: T ; R ; ¼ of ¼ of Sec ; M.D. B.M.

c. Address: City: Zip:

d. UTM: Zone: 10 ; mE/ mN (G.P.S.)

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Elevation:

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

\*P3b. Resource Attributes: (List attributes and codes)

\*P4. Resources Present:  Building  Structure  Object  Site  District  Element of District  Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)

P5b. Description of Photo: (View, date, accession #)

\*P6. Date Constructed/Age and Sources:  Historic  Prehistoric  Both

\*P7. Owner and Address:

\*P8. Recorded by: (Name, affiliation, and address)

\*P9. Date Recorded:

\*P10. Survey Type: (Describe)

\*P11. Report Citation: (Cite survey

report and other sources, or enter "none.")

\*Attachments:  NONE  Location Map  Sketch Map  Continuation Sheet  Building, Structure, and Object Record  
 Archaeological Record  District Record  Linear Feature Record  Milling Station Record  Rock Art Record  
 Artifact Record  Photograph Record  Other (List):

**BUILDING, STRUCTURE, AND OBJECT RECORD**

Page of

\*NRHP Status Code

\*Resource Name or # (Assigned by recorder)

B1. Historic Name:

B2. Common Name:

B3. Original Use:

B4. Present Use:

\*B5. Architectural Style:

\*B6. Construction History: (Construction date, alterations, and date of alterations)

\*B7. Moved? No Yes Unknown Date:

Original Location:

\*B8. Related Features:

B9a. Architect:

b. Builder:

\*B10. Significance: Theme:

Area:

Period of Significance:

Property Type:

Applicable Criteria:

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

B11. Additional Resource Attributes: (List attributes and codes)

\*B12. References:

B13. Remarks:

(Sketch Map with north arrow required.)

\*B14. Evaluator:

\*Date of Evaluation:

(This space reserved for official comments.)

**Noise**

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B
<b>References</b>		
<a href="https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control">https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control</a>		
HUD Noise Guidebook: <a href="https://www.hudexchange.info/resource/313/hud-noise-guidebook/">https://www.hudexchange.info/resource/313/hud-noise-guidebook/</a>		

**1. Will the project alter the building envelope?**

- Yes → Continue to Question 2.
- No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide a description of the project activities.

**2. Will the project include any standardized noise attenuation measures, such as the use of double glazed windows or extra insulation?**

- Yes

**Indicate the type of measures that will apply (check all that apply):**

- Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)
- Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)
- Other

**Explain:**

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide any supporting documentation.

- No

→ Continue to Question 3.

**3. Does the project include substantial rehabilitation?**

- Yes → Continue to Question 4.
- No → Based on the response, the review is in compliance with this section; however, note that HUD encourages noise attenuation features in alterations. Continue to the Worksheet Summary below and provide a description of the project activities.

**4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).**

**Indicate the findings of the Preliminary Screening below:**

- There are no noise generators found within the threshold distances above.  
→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.
- Noise generators were found within the threshold distances.  
→ Continue to Question 3.

**5. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:**

- Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

**Indicate noise level here:**

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

- Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

**Indicate noise level here:**

→ Based on the response, the review is in compliance with this section; however, note that HUD encourages the incorporation of noise attenuation features. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

- Unacceptable: (Above 75 decibels)

**Indicate noise level here:**

→ Based on the response, the review is in compliance with this section; however HUD strongly encourages conversion of noise-exposed sites to land uses compatible with the high noise levels. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

**Are formal compliance steps or mitigation required?**

- Yes
- No

