



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

**Tiered Environment Review
for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name: 24-25-Handyworker-Program

**HEROS
Number:** 900000010395748

**Responsible Entity
(RE):** SANTA CLARITA, 23920 Valencia Blvd Santa Clarita CA,
91355

**State / Local
Identifier:** California

RE Preparer: Donya Plazo

**Certifying
Officer:** Kenneth W. Striplin

**Grant Recipient (if different than Responsible
Entity):**

Point of Contact:

**Consultant (if
applicable):**

Point of Contact:

**Project
Location:** Santa Clarita, CA 91321

Additional Location Information:

Tier II project sites will be identified throughout the program year. All project sites will be inside the City of Santa Clarita city boundaries.

**Direct Comments
to:** Donya Plazo, Project Technician
City of Santa Clarita

24-25-Handyworker-
Program

Santa Clarita, CA

900000010395748

23920 Valencia Blvd.
Santa Clarita, CA 91355
dplazo@santa-clarita.com

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

In Fiscal Year 2024-25, the City of Santa Clarita proposes to allocate \$450,000 in CDBG funds for the Handyworker Program (Program). This Program will provide low- and moderate-income homeowners of owner-occupied homes, townhomes, condominium units, and mobile homes with minor housing repairs and rehabilitation. The purpose of this Program is to maintain these properties in safe and livable condition for residents who lack the financial resources to address maintenance and repairs, and to prevent further deterioration. The scope of services will include minor residential repair activities for residential units (with one to four units) or individual units within multifamily residential buildings that are categorized as either maintenance or rehabilitation activities pursuant to HUD Guidance CPD-16-02, issued February 8, 2016. Eligible interior and exterior repairs include but are not limited to minor roof patching; painting; window, door, and garage repair/replacement; water heater repair/replacement; small scale plumbing repair; heating and air conditioning repair; mobile home skirting; fence and stair repair; ADA improvements; and other activities similar in scope.

Pursuant to HUD Guidance CPD-16-02, the majority of services described qualify as maintenance activities which are categorically excluded from environmental assessment under the National Environmental Policy Act and are not subject to compliance requirements of the related federal environmental laws in 24 CFR 50.4 and 24 CFR 58.5, including the National Historic Preservation Act of 1966. This Tier I Broad Level Environmental Review does not evaluate projects involving maintenance activities for residential units (with one to four units) and multifamily residential building units, rather, a separate Site Specific Categorically Excluded Not Subject to (CENST) Section 58.5 environmental checklist, pursuant to 24 CFR Part 58.35(b) environmental review would be prepared for each individual project under CDBG grant number (B-24-MC-06-0569), as described in the Written Strategies section below.

For residential units (with one to four units) or individual units within multifamily residential buildings with more extensive repair and rehabilitation activities, as identified in CPD-16-02, further environmental review is required and generally covered under this Tier I Broad Level Environmental Review. However, these projects would be evaluated further and individually under a separate Tier 2 Site Specific Environmental Review, as described in the Written Strategies section below.

Note, rehabilitation of a residential building (with one to four units) would qualify under this environmental review when the density is not increased beyond four units, and the land use is not changed. Additionally, rehabilitation of a unit within a multifamily residential building would qualify under this environmental review when the unit density is not changed more than 20 percent, there is no change in land use from residential to non-residential, and the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

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As a subrecipient, the Santa Clarita Valley Committee on Aging ("Senior Center") will administer the Program on the City's behalf. The Senior Center will perform the minor repair work with Senior Center staff, when appropriate, and licensed subcontractors, when required.

Maps, photographs, and other documentation of project location and description:

[City Boundary Map.pdf](#)

Approximate size of the project area: more than 1 square mile

Length of time covered by this review: 1 Year

Maximum number of dwelling units or lots addressed by this tiered review:
60

Level of Environmental Review Determination:

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

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

58.35(a)(3)(i) For residential uses (with one to four units): 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.

58.35(a)(3)(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

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.

Approval Documents:

[CITY OF SCV-24-25 NOIRROF HANDYWORKER AFFIDAVIT.pdf](#)

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

24-25-Handyworker-
Program

Santa Clarita, CA

900000010395748

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-24-MC-06-0569	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$450,000.00

Estimated Total HUD Funded Amount: \$450,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$450,000.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Was compliance achieved at the broad level of review?	Describe here compliance determinations made at the broad level and source documentation.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All project sites will be located within the City of Santa Clarita city boundaries. The City of Santa Clarita is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The nearest general aviation airport, Whiteman Airport, is 7 miles from the City of Santa Clarita city boundaries. The project is in compliance with the Airport Hazards environmental compliance factor. No formal compliance or mitigation steps are required, and no further analysis is necessary.
Coastal Barrier Resources Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Coastal Barrier Resources Act prohibits federal assistance within barrier islands that are subject to frequent damage by hurricanes and high storm surges. All project sites are located within the City of Santa Clarita city boundaries. The City of Santa Clarita does not contain any Coastal Barrier Resources System Units as depicted in the attached Coastal Barrier Resources

		<p>System map by the U.S. Fish and Wildlife Service. Therefore, this project will have no impact on coastal barrier resources. No formal compliance or mitigation steps are required, and no further analysis is necessary.</p> <p>References: US Fish and Wildlife Service. Coastal Barrier Resources System, CBRS Mapper. Accessed April 30, 2024.</p> <p>https://www.fws.gov/program/coastal-barrier-resources-act/maps-and-data</p>
Flood Insurance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Section 202 of the Flood Disaster Protection Act of 1973 (42 United States Code 4106) requires that projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program. FEMA designates floodplains. FEMA's low and moderate risk flood zones begin with the letters "X," "B," or "C." The majority of the City of Santa Clarita is located primarily in Zone X, low and moderate risk flood zone areas. If a project site is located in a special flood hazard area within the project boundaries, it is HUD's policy 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. HUD Environmental Officer Stanley Toal confirmed that policy in the attached email communication. All projects approved eligible for the Handyworker Program have a maximum per project cost of \$5,000. Therefore, this project is exempt from flood insurance based on the project cost and HUD guidance. No formal compliance or mitigation steps are required, and no further analysis is necessary.</p> <p>References: HUD Exchange. Flood</p>

		Insurance. Accessed April 30, 2024 https://www.hudexchange.info/programs/environmental-review/flood-insurance/ Email correspondence dated October 3, 2022, from Sr. Environmental Officer Stanley Toal
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Federally funded projects must conform to Clean Air Act requirements in that they may constitute a significant new source of air pollution. If a project does not involve new construction, or conversion of land use facilitating the development of public, commercial, or industrial facilities, or five or more dwelling units, it can be assumed that emissions are below the US Environmental Protection Agency's (USEPA) de minimis threshold levels. These policies apply to projects that may produce a significant new source of air pollution. This project will not involve new construction and will, rather, provide minor repair or rehabilitation of existing residential dwellings. Eligible interior and exterior repairs include but are not limited to minor roof patching; painting; window, door and garage repair/replacement; water heater repair/replacement; small scale plumbing repair; heating and air conditioning repair; mobile home skirting; fence and stair repair; ADA improvements; and other activities similar in scope. No expansion or new construction will be undertaken under this program. As a result, the City anticipates minimal emissions from minor residential repairs well below pollutant levels set forth by the National Ambient Air Quality Standards. As such, no formal compliance or mitigation steps are required, and no further analysis is necessary. References: HUD Exchange. Air Quality. Accessed on April 30, 2024

		https://www.hudexchange.info/environmental-review/air-quality/
Coastal Zone Management Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The Coastal Zone Management Program (CZMP) is authorized by the Coastal Zone Management Act (CZMA). Projects that can affect a coastal zone must be carried out in a manner consistent with the state CZMP under Section 307(c) and (d) of the CZMA. This project does not require state review under the CZMA as the project site is not within the California Coastal Commission's jurisdiction. California's coastal zone generally extends 1,000 yards (3,000 feet) inland from the mean high tide line. The project site is located approximately 27 miles north of the nearest coastline and will not impact coastal zones. The project is not located in nor does it affect a coastal zone as defined in the California Coastal Zone Management Plan. The project is in compliance with the Coastal Zone Management Act. Therefore, no formal compliance or mitigation steps are required, and no further analysis is necessary. References: City of Santa Clarita Southern California Coastal Map California Ocean Protection Council. Boundaries. https://www.opc.ca.gov/the-california-coastal-geoportal/data-layers/boundaries/</p>
Contamination and Toxic Substances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Endangered Species Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The Endangered Species Act (ESA) of 1973 was designed to protect and recover species in danger of extinction and the ecosystems that they depend upon. Each agency must ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species in the wild or destroy or adversely modify its critical habitat. The environmental review must consider potential impacts of the HUD-assisted project to</p>

		<p>endangered and threatened species and critical habitats. The review must evaluate potential impacts not only to any listed but also to any proposed endangered or threatened species and critical habitats. HUD states that "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 rental assistance, purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings." Based on HUD guidance, the City of Santa Clarita finds that the Handyworker Program is limited to minor residential repair activities and is determined to have No Effect on surrounding species or their habitat. Therefore, no formal compliance or mitigation steps are required, and no further analysis is necessary. References: HUD Exchanged. Endangered Species. Accessed on May 1, 2024. https://www.hudexchange.info/environmental-review/endangered-species/ US Fish and Wildlife Service. Critical Habitat for Threatened & Endangered Species Map. Accessed on April 30, 2024 https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77</p>
Explosive and Flammable Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>According to HUD guidance, project sites located too close to facilities handling, storing or processing conventional fuels, hazardous gases or chemicals of an explosive or flammable nature may expose occupants or end-users of a project to the risk of injury in the event of a fire or an explosion. Regulations require HUD-assisted projects to be separated from these facilities by a distance that is based on the contents and volume of the</p>

		<p>aboveground storage tank, or to implement mitigation measures. HUD guidance also states that if the project does not include development, construction, and/or rehabilitation that will increase residential densities, or conversion, no further compliance or documentation pertaining to aboveground stationary storage tanks is necessary. The Handyworker Program is limited to minor residential repairs of existing residential dwellings. As noted in the Description of the Proposed Project, the nature of these rehabilitation activities for the residential units (with one to four units) or units within multifamily residential buildings would not increase residential densities or result in a change in land use. Therefore, no formal compliance or mitigation steps are required, and no further analysis is necessary.</p> <p>References: HUD Exchange. Explosive and Flammable Hazards. Accessed on May 1, 2024. https://www.hudexchange.info/programs/environmental-review/explosive-and-flammable-facilities/</p>
Farmlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The purpose of the Farmlands Protection Policy Act (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of Federal programs on the unnecessary and irreversible conversion of farmland to non-agricultural uses. The Act does not apply to projects already in or committed to urban development or those that could otherwise not convert farmland to non-agricultural uses. According to the California Department of Conservation, the City of Santa Clarita is primarily classified as "Urban and Built-Up" land, which is not considered farmland. In addition, the nature of the individual project sites is limited to minor</p>

		<p>residential repairs of existing residential dwellings. There are no activities that could potentially convert agricultural land to non-agricultural use. Therefore, no formal compliance or mitigation steps are required, and no further analysis is necessary. References: HUD Exchange. Farmlands Protection. Accessed on May 1, 2024. https://www.hudexchange.info/programs/environmental-review/farmlands-protection/ California Department of Conservation. California Important Farmland Finder. Accessed May 1, 2024. https://maps.conservation.ca.gov/dlrp/ciftimeseries/</p>
Floodplain Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Per 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. On April 23, 2024, HUD published a new rule amending HUD's existing floodplain regulations. This Final Rule newly defines an "FFRMS floodplain" that is a horizontal and vertical expansion of the 100-year floodplain and "requires a greater level of flood protection for new construction and substantial rehabilitation projects." Per 24 CFR 55.12(b), the decision-making process in Section 55.20 shall not apply to "Financial assistance for minor repairs or improvements on one-to four-family properties that do not meet the thresholds for "substantial improvement" under Section 55.2(b)(10)." According to 24 CFR 55.2(b)(10)(i): Substantial improvement means either: (A) Any repair, reconstruction, modernization or improvement of a structure, the cost of which equals or exceeds 50 percent of the market value of the structure either: (1) Before the improvement or repair is started; or (2) If the structure has been damaged, and is being restored, before</p>

		the damage occurred; or (B) Any repair, reconstruction, modernization or improvement of a structure that results in an increase of more than twenty percent in the number of dwelling units in a residential project or in the average peak number of customers and employees likely to be on-site at any one time for a commercial or industrial project. The Handyworker program does not include "newly constructed or substantially improved structures" because the activities under the proposed project will be limited to minor residential repair. Additionally, all projects approved eligible for the Handyworker Program have a maximum per project cost of \$5,000 and would not increase the density or number of units. Given the scope of the proposed project activities, there will be no adverse floodplain impacts associated with the project. No formal compliance steps or mitigation is required, and no further analysis is necessary.
Historic Preservation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Noise Abatement and Control	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	HUD environmental noise regulations are set forth in 24 CFR Part 51B. To demonstrate consistency with HUD environmental noise regulations, HUD requires that for projects involving new construction or rehabilitation of an existing residential property, the environmental review record should contain documentation that the proposed action is not within 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles (79,200 feet) of a military or Federal Aviation Administration regulated civil airfield. The project does not involve new construction. This project involves minor repairs to an existing residential property or mobile home. The project will include standardized noise attenuation measures for repairs, where appropriate. In addition, any minor

Commented [KT1]: Suggest this be included for Tier 2 review. See comment below.

Commented [KT2]: For rehab projects, it seems though the discussion below is true, we would still need to provide the required documentation. Suggest this be included for Tier 2 review. Refer to the Working Strategies section below.

		<p>repair or rehabilitation activities performed under this project are subject to compliance with the City of Santa Clarita Municipal Code noise requirements codified in Chapter 11.44 of the Santa Clarita Municipal Code, Noise Limits, which are enforceable by the City's Code Enforcement Officers in the Community Preservation Division. The law states, in part, that "No person shall engage in any construction work which requires a building permit from the City on sites within three hundred (300) feet of a residentially zoned property except between the hours of seven a.m. to seven p.m., Monday through Friday, and eight a.m. to six p.m. on Saturday. Further, no work shall be performed on the following public holidays: New Year's Day, Thanksgiving, Christmas, Memorial Day and Labor Day." No formal compliance or mitigation steps are required, and no further analysis is necessary. References: HUD Exchange. Noise Abatement and Control. Accessed on May 1, 2024. https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/</p>
Sole Source Aquifers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area which, if contaminated, would create a significant hazard to public health. The Project Site is not located within a designated sole source aquifer watershed area per the USEPA Region 9 Ground Water Office. No formal compliance steps or mitigation is required. References: US Environmental Protection Agency. Sole Source Aquifer Program. Accessed May 1, 2024. https://www.epa.gov/dwssa/map-sole-source-aquifer-locations</p>

Wetlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>According to the USFWS's National Wetlands Inventory, there are no known wetlands that will be affected by this project. Moreover, Wetlands Provisions of 24 CFR Part 55 do not apply to rehabilitation of one- to four-family properties (s.55.12(a)(3)). These policies apply to projects that involve new construction, expansion of a building's footprint, or ground disturbance. This project involves minor residential repair to existing residential structures, condominium units, townhomes and mobile homes. No new construction, building expansion, or ground disturbance is allowed under this project. This project includes no activities that warrant formal compliance steps or mitigation, and no further analysis is necessary. References: US Fish and Wildlife Service. National Wetlands Inventory. Wetlands Mapper. Accessed April 30, 2024. https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper</p>
Wild and Scenic Rivers Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System. It encourages river management that crosses political boundaries and promotes public participation in developing goals for river protections. The Nationwide Rivers Inventory, maintained by the National Park Service, lists more than 3,200 free-flowing river segments in the United States that are believed to possess one or more remarkable natural or cultural values judged to be at least regionally significant. All federal agencies must avoid or mitigate actions that would adversely affect Nationwide Rivers Inventory River segments. According to</p>

		the Nationwide Rivers Inventory and the National Wild and Scenic Rivers System maps, the City of Santa Clarita is not within proximity to a designated Wild, Scenic, or Recreational River. No formal compliance or mitigation measures are required, and no further analysis is warranted.
ENVIRONMENTAL JUSTICE		
Environmental Justice	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Executive Order 12898 requires certain federal agencies, including HUD, to consider how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and/or low-income populations. This project involves minor residential repairs for low- and moderate-income participants to keep their residential units in safe and livable condition. This project will improve living conditions for the City's most vulnerable residents. There are no adverse environmental or health impacts that will disproportionately occur on minority and/or low-income populations. No formal compliance steps or mitigation is required, and no further analysis is necessary. References: HUD Exchange. Environmental Justice. Accessed May 1, 2024. https://www.hudexchange.info/environmental-review/environmental-justice/

Supporting documentation

[CBRS Units Map.pdf](#)
[Coastal Zone Map.pdf](#)
[Critical Habitat Map.pdf](#)
[Flood exception\(1\).pdf](#)
[Flood exception 2.pdf](#)
[Floodplain Exemption 2.pdf](#)
[Floodplain Exemption 1.pdf](#)
[Sole Source Aquifer Map.pdf](#)
[Wetlands Inventory Map.pdf](#)
[Nationwide Rivers Inventory.pdf](#)
[National Wild and Scenic Rivers.pdf](#)

[Airport Clear Zone Map.pdf](#)

Written Strategies

The following strategies provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

As discussed in the Description of the Proposed Project, the Program's scope of services would include minor residential repair activities for residential units (with one to four units) or units within multifamily residential buildings that are categorized as either maintenance or rehabilitation activities pursuant to HUD Guidance CPD-16-02.

Maintenance Projects

For project involving maintenance activities, a separate Site Specific Categorically Excluded Not Subject to (CENST) Section 58.5 Pursuant to 24 CFR Part 58.35(b) environmental review would be prepared for each individual project under CDBG grant number (B-24-MC-06-0569). The site specific CENST would evaluate Airport Hazards, Coastal Barrier Resources, and Flood Insurance for each project.

Rehabilitation Projects:

Rehabilitation projects related to residential uses (with one to four units) or multifamily residential buildings are covered under this Tier I Board Level Environmental Review. For projects involving more extensive repair and rehabilitation activities, a separate Tier 2 Site Specific Environmental Review would be prepared as follows.

1	Contamination and Toxic Substances
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	<p>It is HUD policy that all properties 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. HUD guidance states that particular attention should be given to any proposed site on or in the general vicinity of dumps, landfills, industrial sites, or other locations that contain, or may have contained, hazardous materials/wastes. The City will conduct a site-specific review for each project site as they are identified. The review will include physical inspection of the property and completion of the HUD recommended Field Contamination Checklist to evaluate the site for contamination. City staff will perform research to determine if there are any on-site or nearby toxic, hazardous, or radioactive substances found within a 3,000 foot study radius (according to HUD's guidance) of the project site that may affect the health and safety of project occupants. In addition, as source documentation, City staff will utilize the EPA's EnviroMapper to provide a NEPA report that will identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List site (Superfund sites), RCRA compliance reports, and the most current available data sources as needed depending on the individual project site. These sources may include but are not limited to the California Department of Toxic Substances Control, EnviroStor search, and the State Water Resources Control Board GeoTracker Map, LUST site summary. The City will not commit or expend federal funds on any project site located near an identified facility that is non-compliant with federal regulations. The City will maintain source documentation in the program file for all facilities located within a 3,000 radius. On January 11, 2024, and effective April 11, 2024, HUD issued Notice CPD-23-103 regarding Radon. Under this new policy notice, radon gas must now be considered in the contamination analysis required under HUD's contamination regulations at 24 CFR Part 50.3(i) and 58.5(i). The policy encourages the testing of radon as the most effective means by which site-specific levels of radon can be identified, though the policy does not require testing. The City finds that for site-specific environmental reviews, "radon testing would be infeasible or impracticable" due to the following reasons: 1) the cost of professional testing would be too significant and could cause the proposed project of very low-dollar cost to be untenable, and 2) the use of affordable DIY test kits would be impracticable as the time required to conduct (at least 2 days), mail back to a lab, and process (within 21 days) would not be completed within a sufficient timeframe required to implement the City's Handyworker Program site-specific projects. No formal compliance or mitigation steps are required, and no further evaluation is needed.</p>
2	Historic Preservation

	<p>The National Historic Preservation Act (NHPA) directs local governments to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 Review, provides a process for consideration of historic places in project planning and full consultation with interested parties for effective Section 106 compliance. The City will conduct site-specific reviews as project sites are identified. The City will request consultation under Section 106 for all project site locations that meet the criteria and thresholds delineated in the City's Programmatic Agreement with the California State Historic Preservation Office (SHPO) dated September 10, 2021. The City does not need to consult with SHPO for projects involving rehabilitation of mobile homes or trailers. The City will not proceed with the proposed project until the City receives a response of no objection from SHPO. If SHPO has not responded to the City's request for concurrence within 30 days of receipt of the request, the City will document the request and lack of response as part of the administrative record before proceeding with next steps.</p>
3	<p>Noise Abatement and Control</p> <p>HUD environmental noise regulations are set forth in 24 CFR Part 51B. To demonstrate consistency with HUD environmental noise regulations, HUD requires that for projects involving new construction or rehabilitation of an existing residential property, the environmental review record should contain documentation that the proposed action is not within 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles (79,200 feet) of a military or Federal Aviation Administration regulated civil airfield. The projects would not involve new construction and would involve minor repairs or rehabilitation to an existing residential property or mobile home. As such, the City will document and screen for major roadways, railroads, and military or FAA-regulated airfields in the vicinity of the project. The City will assess if the project site is located within these distances, the noise level is "Acceptable" (at or below 65 DNL), and/or there is an effective noise barrier that provides sufficient protection using the Day/Night Noise Level Calculator Tool (https://www.hudexchange.info/programs/environmental-review/dnl-calculator/). If the noise generated by the noise source(s) is "Normally Unacceptable" (66-75 DNL), the City may consider noise attenuation requirements that will bring the interior noise level to 45 DNL and/or exterior noise level to 65 DNL, as recommended by HUD.</p>

Commented [KT3]: Suggest including this Noise assessment as part of the rehab Tiered Review to satisfy the compliance and documentation requirements of a rehabilitation for this topic area.

Supporting documentation

[Historic Preservation SHPO.pdf](#)

[24-25 Contamination Checklist.docx](#)

[24-25 Statutory Checklist Exemplar.docx](#)

APPENDIX A: Site Specific Reviews